

CITY OF LOS ANGELES
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CALIFORNIA ENVIRONMENTAL QUALITY ACT
PROPOSED MITIGATED NEGATIVE DECLARATION

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LEAD CITY AGENCY

City of Los Angeles

COUNCIL DISTRICT

CD 14 - JOSE HUIZAR

PROJECT TITLE

ENV-2014-3948-MND

CASE NO.

DIR-2014-3947-SPR

PROJECT LOCATION

555 and 581 SOUTH MATEO STREET AND 1248 AND 1262 EAST PALMETTO STREET

PROJECT DESCRIPTION

The Project Site is generally located on the southwest corner of Mateo Street and Palmetto Street in the Central City North Community Plan Area of the City of Los Angeles. The Project Site is bounded on the north by Palmetto Street, on the east by Mateo Street, and on the south and west by existing industrial warehouse uses. The total area of all the parcels that compose the Project site is approximately 154,736 square feet (or 3.55 acres). The Project Site is zoned M3-1-RIO (Heavy Industrial Zone, Height District 1, Los Angeles River Improvement Overlay) and the General Plan land use designation for the Site is Heavy Industrial. The Site formerly contained three adjacent industrial warehouse buildings, one of which included rooftop parking. Most of these structures have recently been demolished. The Project proposes to incorporate a portion of the building located at 581 S. Mateo. The Project would develop a 153,000 square foot retail center, consisting of 103,422 square feet of retail space and 49,578 square feet of restaurant space in Buildings 1-4. Project Building 4 would consist of ground level retail with three levels of above grade parking and one subterranean level used for loading/parking.

The Project will require approval of the following discretionary actions:

1. Pursuant to L.A.M.C. Section 16.05, the Applicant requests the approval of Site Plan Review findings for a development project, which results in any change of use other than to a Drive-Through Fast-food Establishment or to a Fast-food Establishment which results in a net increase of 1,000 or more average daily trips as determined by, and using the trip generation factors promulgated by the Department of Transportation.
2. Pursuant to L.A.M.C. Section 12.24, the Applicant requests the approval of a Master Conditional Use Permit - Alcohol (CUB) to permit the sale and dispensing of alcoholic beverages for on- and off-site consumption in conjunction with 49,578 square feet of restaurant/retail space (one off-site sale use and 11 on-site sales uses, all full-line).
3. Pursuant to various sections of the L.A.M.C., the Applicant will request approvals and permits from the Building and Safety Department (and other municipal agencies) for project construction actions including, but not limited to, the following: demolition, excavation, shoring, grading, foundation, and building and tenant improvements.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY

ASB/BLATTEIS PALMETTO, LLC
1940 CENTURY PARK EAST, #200
LOS ANGELES, CA 90067

FINDING:

The City Planning Department of the City of Los Angeles has Proposed that a mitigated negative declaration be adopted for this project because the mitigation measure(s) outlined on the attached page(s) will reduce any potential significant adverse effects to a level of insignificance

(CONTINUED ON PAGE 2)

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED.

Any written comments received during the public review period are attached together with the response of the Lead City Agency. The project decision-maker may adopt the mitigated negative declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING THIS FORM

MAY SIRINOPWONGSAGON

TITLE

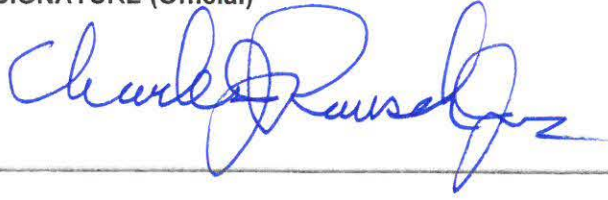
City Planning Associate

TELEPHONE NUMBER

(213) 978-1372

ADDRESS

200 N. SPRING STREET, 7th FLOOR
LOS ANGELES, CA. 90012

SIGNATURE (Official)A handwritten signature in blue ink, appearing to read "Charles Rauscher", written over a horizontal line.**DATE**

09/14/2015



Environmental Review Section

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



INITIAL STUDY / MITIGATED NEGATIVE DECLARATION CENTRAL CITY NORTH COMMUNITY PLAN AREA

At Mateo

Case No. ENV-2014-3948-MND

Council District No. 14

THIS DOCUMENT COMPRISES THE INITIAL STUDY/PROPOSED MITIGATED NEGATIVE DECLARATION ANALYSIS AS REQUIRED UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

Project Addresses: 555 and 581 S. Mateo Street; 1262 and 1248 E. Palmetto Street, Los Angeles, CA 90013

Project Description: The Project Site is generally located on the southwest corner of Mateo Street and Palmetto Street in the Central City North Community Plan Area of the City of Los Angeles. The Project Site is bounded on the north by Palmetto Street, on the east by Mateo Street, and on the south and west by existing industrial warehouse uses. The total area of all the parcels that compose the Project site is approximately 154,736 square feet (or 3.55 acres). The Project Site is zoned M3-1-RIO (Heavy Industrial Zone, Height District 1, Los Angeles River Improvement Overlay) and the General Plan land use designation for the Site is Heavy Industrial. The Site formerly contained three adjacent industrial warehouse buildings, one of which included rooftop parking. Most of these structures have recently been demolished. The Project proposes to incorporate a portion of the building located at 581 S. Mateo. The Project would develop a 170,906 square foot commercial center, consisting of 73,291 square feet of retail space, 48,040 square feet of creative office space, 2,000 square feet of retail space set aside in a specialty market for off-site sales of alcoholic beverages, and 47,575 square feet of restaurant space in Buildings 1-4, resulting in an overall 1.1:1 FAR for the Project Site. Project Building 4 would consist of ground level retail with three levels of above grade parking and one subterranean level used for loading/parking.

The Project will require approval of the following discretionary actions:

1. Pursuant to L.A.M.C. Section 16.05, the Applicant requests the approval of Site Plan Review findings for a development project, which results in any change of use other than to a Drive-Through Fast-food Establishment or to a Fast-food Establishment which results in a net increase of 1,000 or more average daily trips as determined by, and using the trip generation factors promulgated by the Department of Transportation.
2. Pursuant to L.A.M.C. Section 12.24, the Applicant requests the approval of a Master Conditional Use Permit – Alcohol (CUB) to permit the sale and dispensing of alcoholic beverages for on- and off-site consumption in conjunction with 49,575 square feet of restaurant/retail space (one off-site sale use and 11 on-site sales uses, all full-line).
3. Pursuant to various sections of the L.A.M.C., the Applicant will request approvals and permits from the Building and Safety Department (and other municipal agencies) for project construction actions including, but not limited to, the following: demolition, excavation, shoring, grading, foundation, and building and tenant improvements.

APPLICANT:

ASB/Blattels Palmetto, LLC

PREPARED FOR:

Los Angeles Department of City Planning

PREPARED BY:

CAJA Environmental Services, LLC

August 2015

MITIGATION MEASURES

1. AESTHETICS: VISUAL CHARACTER/ LIGHT AND GLARE

1-1 Aesthetics (Landscape Plan)

- All open areas not used for buildings, driveways, parking areas, recreational facilities or walkways shall be attractively landscaped and maintained in accordance with a landscape plan and an automatic irrigation plan, prepared by a licensed Landscape Architect and to the satisfaction of the Department of City Planning.

1-2 Aesthetics (Signage on Construction Barriers)

- The applicant shall affix or paint a plainly visible sign, on publicly accessible portions of the construction barriers, with the following language: "POST NO BILLS".
- Such language shall appear at intervals of no less than 25 feet along the length of the publicly accessible portions of the barrier.
- The applicant shall be responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence.

1-3 Aesthetics (Light)

- Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above.

1-4 Aesthetics (Glare)

- The exterior of the proposed structures shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

3. AIR QUALITY

3-1 Air Quality (Construction)

- During grading activities, the unpaved portions of the site shall be watered at least three times daily to reduce PM₁₀ and PM_{2.5} emissions.
- Ground cover shall be replaced and/or installed as soon as practical to reduce fugitive PM₁₀

and PM_{2.5} emissions.

- Wheel washers and/or rumble grates shall be used at the entrance/exit(s) to the construction site to minimize track-out of soils.

3-2 Air Quality (Construction)

- The application of architectural coatings shall be performed over a period of at least ten weeks to ensure daily VOC emissions do not exceed SCAQMD's recommended threshold of significance of 75 pounds per day.

6. GEOLOGY/SOILS

6-1 Geology and Soils (Seismic)

- The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

6-2 Geology and Soils (Geotechnical Report)

- The Applicant shall comply with the recommendations contained within the Geotechnical Report (Appendix A to the IS/MND), as well as all conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the At Mateo Project, and as it may be subsequently amended or modified.

6-3 Geology and Soils (Erosion/Grading/Short-Term Construction Impacts)

- The Applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.
- Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. The Applicant shall implement Best Management Practices ("BMPs") during grading and excavation to reduce erosion, including, but not limited to the following:
 - Excavation and grading activities shall be scheduled during dry weather periods to the extent practical. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.

- o Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a biodegradable soil stabilizer.

7. GREENHOUSE GAS EMISSIONS

7-1 Greenhouse Gas Emissions (Electronic Vehicle Accommodation)

- Electronic Vehicle (EV) ready conduits shall be installed for a minimum of twenty percent of the parking spaces located within the Project parking structure.

8. HAZARDOUS MATERIALS

8-1 Hazards and Hazardous Materials (Soil Contamination)

- Following removal of the existing site improvements, the excavation, transport, and disposal of the contaminated soil materials on the Project site shall be performed in accordance with the specific recommended remedial alternative set forth in the Remedial Action Work Plan (RAW), subject to approval by DTSC. Implementation of the RAW shall proceed in accordance with all applicable local, state, and federal regulations. The Project Applicant shall comply with all conditions contained in the Draft RAW, as it may be subsequently amended or modified.

12. NOISE

12-1 Noise (Construction Noticing)

- The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

12-2 Noise (Construction Staging)

- The construction staging area shall be as far from sensitive receptors as possible.

12-3 Noise (Temporary Construction Barrier – Palmetto Street)

- A temporary construction barrier, capable of achieving a sound attenuation of at least 12 dBA (e.g., construction sound wall with sound blankets) shall be installed along the northerly property line adjacent to Palmetto Street.

12-4 Noise (Construction Notification)

- Two weeks prior to commencement of construction, notification shall be provided to the off-site residences within 500 feet of the Project site that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period.

12-5 Noise (Demolition, Grading, and Construction Activities)

- Construction and demolition shall be restricted to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday.
- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously to the extent feasible.
- The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

12-6 Noise (Parking Structure Ramps)

- Concrete, not metal, shall be used for construction of parking ramps.
- Interior parking structure ramps shall be textured to prevent tire squeal at turning areas.

16. TRAFFIC/TRANSPORTATION

16-1 Transportation/Traffic (Operation)

- All measures detailed in the Department of Transportation's communication to the Planning Department, dated February 9, 2015, and included in Appendix F to this IS/MND shall be implemented and complied with. Such communication and mitigation measures are incorporated herein by reference.
- Adjacent sidewalks shall remain open and unobstructed during the demolition and construction phase of the Project. Permits shall be obtained from the Bureau of Street Services prior to the closure of any adjacent sidewalks and/or construction of protection fences or canopies within the public rights-of-way. Protection of pedestrian access shall be provided pursuant to LAMC Section 91.3306.

17. UTILITIES**17-1 Utilities/Service Systems (Local Water Supplies)**

- Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate.
- Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.
- Install and utilize only restroom faucets of a self-closing design.
- Install and utilize only high-efficiency Energy Star-rated dishwashers in the Project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the Applicant shall be responsible for ensuring compliance.
- Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements (single-pass cooling refers to the use of potable water to extract heat from process equipment, such as vacuum pumps or ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system).

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APPENDICES

- A Site Photo Exhibit, Craig Lawson & Co., LLC, October 13, 2014.
- B Air Quality/Greenhouse Gas Emissions Appendix
- C Historical Resource Assessment Report, Urbana Preservation & Planning, November 2014.
- D Geotechnical Study: Proposed Palmetto Arts District Development, Southwest Corner of Palmetto Street and Mateo Street, Los Angeles, California, Kleinfelder, October 9, 2014.
- E Noise Analysis Appendix
- F Traffic Impact Analysis Report: At Mateo Retail Development, R.A. Smith National, Inc., February 6, 2015; LADOT; LADOT Memorandum, February 9, 2015; and, Updated Traffic Assessment Memo, June 8, 2015.
- G Draft Remedial Action Work Plan, At Mateo, 555 Mateo Street, Los Angeles, California, Kleinfelder, July 16, 2015.

I. INTRODUCTION

The subject of this Initial Study/Mitigated Negative Declaration (IS/MND) is the proposed At Mateo development (the “Project” or “Proposed Project”), which consists of the redevelopment of an existing industrial warehouse site at the southwest corner of Mateo Street and Palmetto Street in the Downtown Los Angeles Arts District with a 170,906 square foot commercial center, consisting of 73,291 square feet of retail space, 48,040 square feet of creative office space, 2,000 square feet of retail space set aside in a specialty market for off-site sales of alcoholic beverages, and 47,575 square feet of restaurant space.¹ Parking for the Project (540 automobile spaces, 69 short-term bicycle spaces, and 76 long-term bicycle spaces) would be provided in a three-level (plus rooftop) structure above ground-floor retail and one subterranean parking level (Project Building 4).

PROJECT INFORMATION

Project Title: At Mateo

Project Location: 555 and 581 S. Mateo Street; 1262 and 1248 E. Palmetto Street, Los Angeles, CA

Lead Agency: City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 721, Los Angeles, CA 90012

City Staff Contact: May Sirinopwongsagon, Expedited Processing Section

Applicant: ASB/Blattels Palmetto, LLC; represented by Keith Ray, EDGE
Architecture/Planning, LLC; 450 Newport Center Drive #200, Newport Beach, CA

ORGANIZATION OF THE INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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

I. Introduction: This section (above) provides introductory information about the Project.

II. Project Description: This section provides a detailed description of the environmental setting and the Project, including Project characteristics, Project objectives, and environmental review requirements.

¹ The Project consists of 49,575 square feet of restaurant and retail space for the sale of alcoholic beverages. The 47,575 square feet of restaurant space will provide on-site consumption of a full line of alcoholic beverages, and 2,000 square feet of space inside a specialty market will offer the sale of a full line of alcoholic beverages for off-site consumption.

III. Initial Study Checklist: This section contains the completed Initial Study Checklist showing the significance level under each environmental impact category.

IV. Environmental Impact Analysis: Each environmental issue identified in the Initial Study Checklist contains an assessment and discussion of impacts associated with each subject area. When the evaluation identifies potentially significant effects, as identified in the Checklist, mitigation measures are provided to reduce such impacts to a less than significant level.

V. List of Preparers: This section provides a list of City personnel, other governmental agencies, and consultant team members that participated in the preparation of the IS/MND.

Appendices: Includes various documents, technical reports, and information used in the IS/MND.

II. PROJECT DESCRIPTION

A. PROJECT LOCATION

The location of the proposed At Mateo development (“Project” or “Proposed Project”) at 555/581 S. Mateo Street and 1248/1262 E. Palmetto Street (“Project Site”) is within the downtown Los Angeles Arts-in-Residence District, within the boundaries of the Central City North Community Plan Area. The Project Site is located along Mateo Street at the southwest corner of Palmetto Street and Mateo Street and includes approximately 154,736 square feet (or 3.55 acres) of lot area, and is generally bounded on the north by Palmetto Street, on the east by Mateo Street, and on the south and west by existing industrial warehouse uses. See also Figure II-1, Regional and Project Vicinity Map, and Figure II-2, Aerial Map.

Table II-1 shows the address, zoning, land use, and lot area for the Project Site.

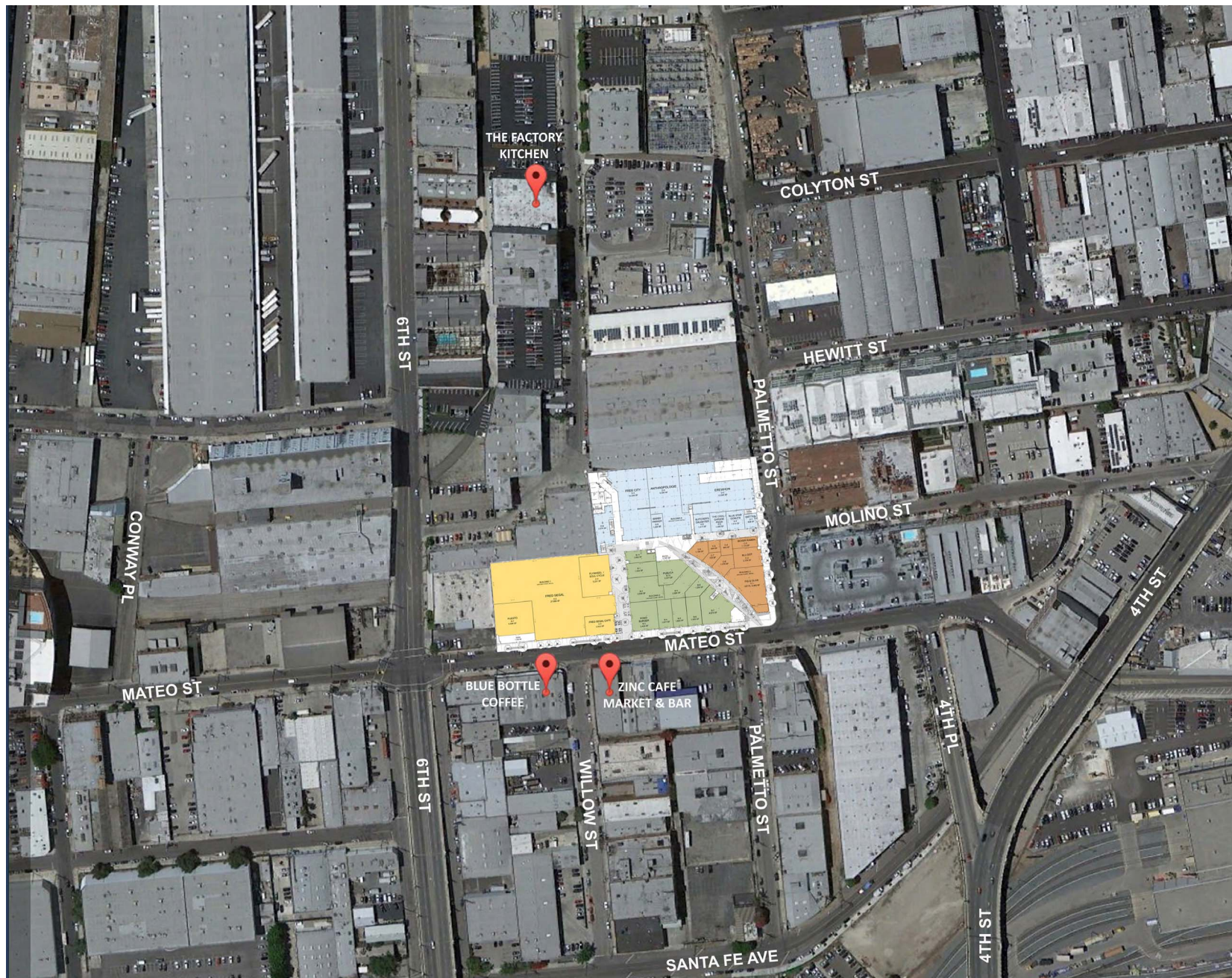
Table II-1
Project Site Characteristics

Address	Zoning	General Plan	Other Plans	Gross Lot Area
555 S. Mateo Street; 581 S. Mateo Street; 1248 E. Palmetto Street; 1262 E. Palmetto Street	M3-1-RIO	Heavy Industrial	Central Industrial Redevelopment Project; Los Angeles River Improvement District (LA-RIO)	154,736 s.f. (3.55 acres)
Source: http://zimas.lacity.org/ accessed February 2015.				

B. REGIONAL AND LOCAL ACCESS

The Hollywood Freeway (US-101) and the Santa Monica Freeway (I-10) provide primary regional access to the Project Site. The Hollywood Freeway runs in a north-south direction east of the Project Site, while the Santa Monica Freeway runs in an east-west direction south of the Project Site. These two freeways also provide access to the Harbor Freeway (I-110) to the west, to the Santa Ana (I-5) freeway to the south, to the Golden State Freeway (I-5) to the north, and to the San Bernardino (I-10) and Pomona (SR-60) freeways to the east.

Major surface street arterials within the vicinity include Alameda Street, Santa Fe Avenue, 4th Street, 6th Street, and 7th Street. The east-west aligned 6th Street, classified as a Secondary Highway, is located a half-block to the south of the Project site, while the east-west aligned Palmetto Street, classified as a Collector Street, borders the site to the north. The north and south-aligned Mateo Street, classified as a Secondary Highway, borders the site to the east and intersects with Palmetto Street at the site’s northeast corner. Alameda Street, which is located approximately 1,000 feet to the west of the Project site, is a two-way north-southbound street providing two travel lanes in each direction and is classified as a Major Highway Class II.



Source: EDGE Architecture/Planning, 06.17.15.

Public Transit

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

The nearest local bus (Metro Local) stop to the Project site (and closest public transit stop of any type) is on Metro Local Bus Line 18, which runs east-west along 6th Street, and is located on 6th Street at Mateo Street, approximately 60 feet south of the Project site. Metro Local Line 18 continues to the west through Downtown Los Angeles and then along Wilshire Boulevard to its final destination at Western Avenue in the Wilshire District. Going east along 6th Street, Metro Local Line 18 continues to run along Whittier Boulevard through East Los Angeles and eastward to the Metrolink station in Montebello.

Metro DASH Bus Line A serves the Arts District, with a stop at Traction Avenue and Merrick Street, approximately one-fifth of a mile north of the Project Site. Metro DASH Line A runs to the west along 1st Street with convenient stops near City Hall, the Civic Center and County buildings, and then running south along Figueroa Street, and then proceeding along Wilshire Boulevard to City West, with a final stop at Witmer Street, and then returning along 7th Street, with a stop at Metro Rail's 7th Street/Metro Center station.

The Metro Gold Line rail system is accessed at the Little Tokyo/Arts District station at 1st Street and Alameda Street, approximately 0.8 mile from the Project site. The Metro Gold Line offers service to East Los Angeles to the east and Pasadena to the northeast. The Metro Gold Line connects to Union Station, providing access to Metrolink, the Metro Silver Bus Line, and Metro Rail Red and Purple Lines.

C. ZONING AND LAND USE DESIGNATIONS

The Project site is located within the Central City North Community Plan Area of the City of Los Angeles and within the Central Industrial Redevelopment Plan Area. The Project is also within the East Los Angeles State Enterprise Zone.¹ The Federal, State, and City governments provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services. The Enterprise Zone (EZ) special provisions applicable to plan check relate to parking standards and height.

¹ City of Los Angeles Department of City Planning, Zoning Information and Map Access System, website: <http://zimas.lacity.org/>.

The Project Site is currently zoned M3-1-RIO (Heavy Industrial, Height District 1) with a General Plan land use designation of Heavy Industrial. Pursuant to Section 12.20 of the Los Angeles Municipal Code (LAMC), the following uses are permitted in the M3-1-RIO zone: various industrial, manufacturing, commercial, and office uses. The -1 designation indicates that the Project Site is located in Height District 1, which does not specify a building height limit, but rather limits floor area ratio (“FAR”) on the Project Site to 1.5:1. The subject property is located within the Central Industrial Redevelopment Project Area, which designates the subject site as Light Industrial. The site is located in the Los Angeles River Improvement Overlay (RIO) District, effective August 20, 2014, pursuant to Ordinances 183,144 and 183,145.

The Project is consistent with the site’s current zoning and General Plan land use designation.

D. EXISTING CONDITIONS

The Project site was formerly developed with three warehouse buildings, one of which included a ramp to a rooftop parking area, containing a total of 148,000 square feet of active light industrial land uses. Most portions of these structures were recently demolished, although a portion of the structure at 581 Mateo Street remains and is proposed to be incorporated into the Project. Approximately 941.5 cubic yards of lead, cadmium, and total petroleum hydrocarbon (TPH) impacted shallow soil is present on-site.

E. SURROUNDING LAND USES

The site is surrounded by M3-1-RIO zoned properties to the north, south, east and west. The surrounding properties include a mix of industrial, commercial, mixed-use, and residential projects. The Barker Block Lofts and Molino Lofts are adaptive reuse projects that include joint live/work units and commercial space. To the south, along the north side of 6th Street and to the west of Mateo Street, the Factory Place Arts Complex includes ground floor retail and commercial uses along with residential lofts. To the south of 6th Street and in the vicinity of Mateo Street are numerous markets, cafés, restaurants and other amenities easily accessible to persons working and living in the surrounding neighborhood.

North: M3-1-RIO – Barker Block – Warehouse No. 1 Lofts and Molino Lofts

South: M3-1-RIO – warehouse building

East: M3-1-RIO parcels, across Mateo Street, include Zinc Café & Market, Blue Bottle Coffee, the Rec Center Crossfit Gym, and warehouse and seafood wholesale distributors

West: M3-1-RIO – empty warehouse building

A small parcel is located immediately adjacent to the Project site to the north along the south side of Palmetto Street (adjacent to 1248 E. Palmetto Street). This parcel is owned by the City and is currently used for perpendicular street parking.

F. PROPOSED DEVELOPMENT

The Applicant proposes the construction of a commercial project, containing retail, creative office, and dining opportunities, at the Project site. As proposed, the corner site, located at the southwest corner of Mateo Street and Palmetto Street, would be developed with a series of four buildings (Buildings 1-4) divided by a corner plaza and a network of pedestrian walkways. The Applicant's stated goal is to create a unique shopping and dining experience that is consistent with the built environment's industrial context and addresses the retail needs of the expanding Arts District, and the proximate larger downtown community.

As designed, the Project would range in height from one to 4.5 stories (the half level would consist of roof top parking) above street grade. Building 1, located on Mateo Street in the southernmost section of the site, would include expansive interior commercial spaces and would contain one level reaching a height of 31 feet. Building 2, reaching a height of 52 feet and located on Mateo Street to the north of Building 1 (separated from it by a paseo), would be three stories with ground floor retail and upper floor creative office space. Building 3, located on Palmetto Street and separated from Building 2 by a corner paseo/plaza area opening onto the corner of Mateo and Palmetto Streets, would have two stories of retail and restaurant space, reaching a height of 42 feet and 4 inches. Building 4, reaching a height of 55 feet and located on Palmetto Street in the northwestern portion of the site, would contain 4.5 levels above street grade, including ground level retail, 3.5 levels of above grade parking (with the roof top parking level representing the half-level), and one subterranean level used for parking. Building 1 would consist of the existing warehouse structure at 581 S. Mateo Street with new facades and structural improvements. Buildings 2 through 4 would be new structures.

The project would contain approximately 170,906 square feet, consisting of 73,291 square feet of retail space, 48,040 square feet of creative office space, 2,000 square feet of retail space set aside in a specialty market for off-site sales of alcoholic beverages, and 47,575 square feet of restaurant space, creating a 1.1:1 floor area ratio.² Retail uses would be strategically located along the street frontages and internal walkways to maximize and enhance pedestrian activity. The restaurant spaces would be mainly located at the interface of the street frontages and the paseos, although 10,552 square feet of restaurant space would be located on the second story of Building 3, where the space would overlook the paseo and the street. Outdoor dining is anticipated to occur within the site. The Project would include up to 14 on-site and one off-site full-line alcohol sale uses. The creative office space would occupy the upper two floors of Building 2.

The Project would also contain approximately 15,000 square feet for open spaces, including a prominent plaza located at the corner of Palmetto and Mateo Streets. Three paseos would separate the buildings,

² The Project consists of 49,575 square feet of restaurant and retail space for the sale of alcoholic beverages. The 47,575 square feet of restaurant space will provide on-site consumption of a full line of alcoholic beverages, and 2,000 square feet of space inside a specialty market will offer the sale of a full line of alcoholic beverages for off-site consumption.

providing light, air, scale, outdoor dining opportunities, and landscaping, all of which would be designed to enhance the pedestrian experience. The majority of the paseos, and the entire corner plaza, would be open air. A covered walkway within Building 4 would be built in anticipation of a pedestrian path leading to Factory Place on the west side of the Project site.³ The paseos would bisect the Project to create an inviting pedestrian experience so that visitors may stroll through the site with easy access to the retail stores. These features would result in approximately 10 percent of the total Project site being open space on industrial property that typically has not provided open areas for pedestrians.

The Project proposes to create a mix of ground floor commercial retail space to serve the needs of the surrounding neighborhood, which is currently developed with an assortment of commercial, industrial and residential uses. A vibrant residential community has been established with the nearby Barker Block Lofts and Molino Lofts, and the Project would provide retail and restaurant uses to serve this community as well as the workers in nearby commercial and industrial establishments.

Table II-2 below lists the projected land uses and relative size. Figures II-3 through II-11 present floor plans, a site demolition plan, cross-sections, elevations, and architectural renderings for the Project.

Table II-2
Proposed Project Development Program

Land Uses	Permitted Floor Area (sf)	Proposed Floor Area (sf)
Retail	232,104 (total)	73,291
Creative Office	232,104 (total)	48,040
Restaurant/Café	232,104 (total)	49,575 ^a
TOTAL	232,104	170,906
<i>Notes: sf = square feet</i>		
<i>^a Includes 2,000 square feet set aside in a market for off-site sales of alcoholic beverages.</i>		

G. FLOOR AREA AND BUILDING HEIGHT

The Project would be developed at a floor-area ratio (FAR) of 1.1:1, which is less than the 1.5:1 FAR allowed under the site's current zoning and height district designation. Project Buildings 1-3 would range from 31 feet to 52 feet in height above street grade. Building 4 would be 55 feet in height but would

³ This design feature is subject to a future private agreement between the Applicant and the adjacent property owner.

include one elevator tower that reaches a height of 67 feet above street grade in the center of the site, representing the tallest portion of the Project.

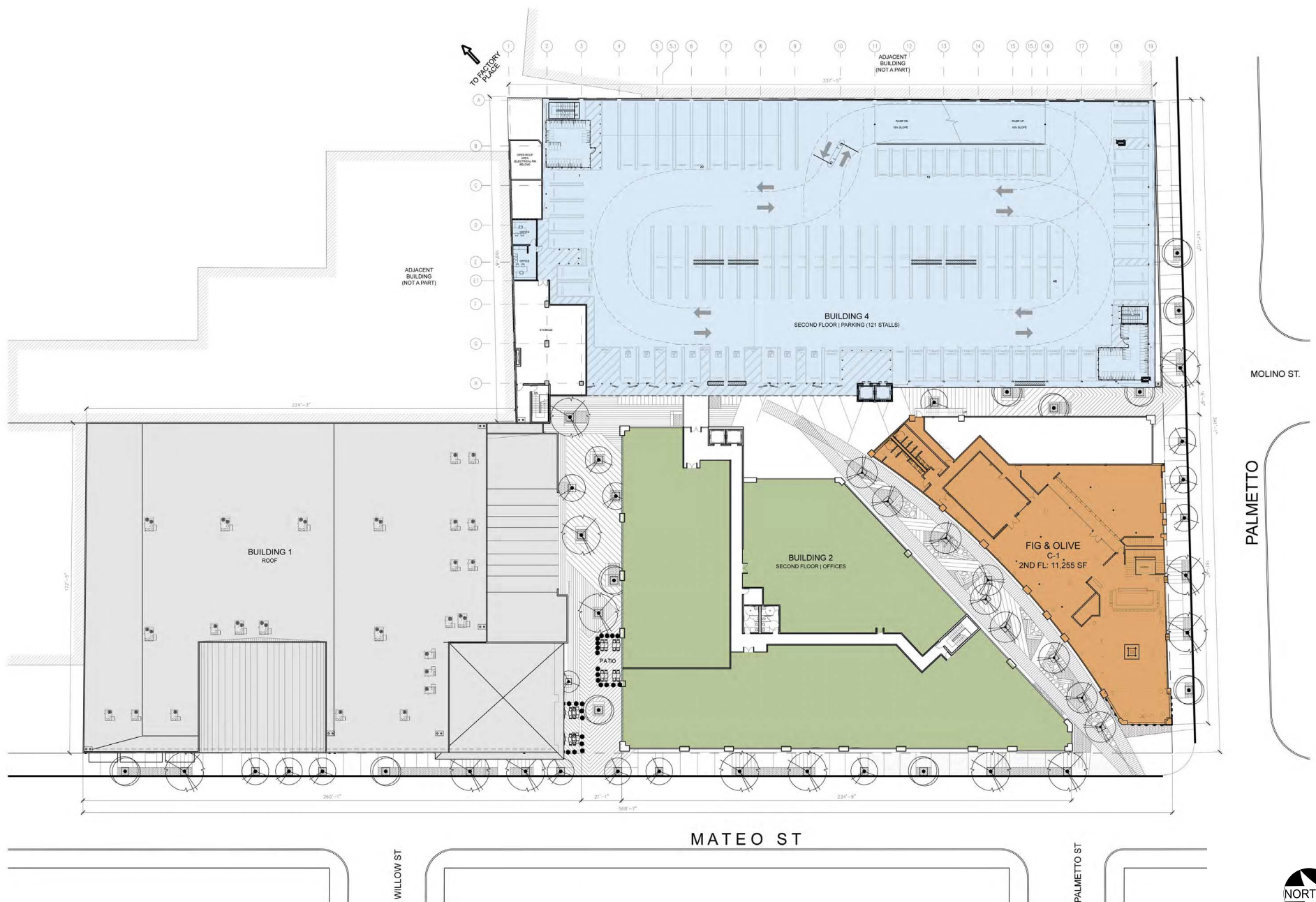
H. PARKING AND ACCESS

Vehicular access to the Proposed Project would be provided via a driveway leading into the parking structure (Building 4) from Palmetto Street at the northwest corner of the Project site. The parking structure would be accessible to Project patrons via elevators and stairs located on the paseo. Other pedestrian access to the Project would be from the paseos along Mateo Street and Palmetto Street, including the corner plaza entry at the intersection of Mateo and Palmetto Streets.

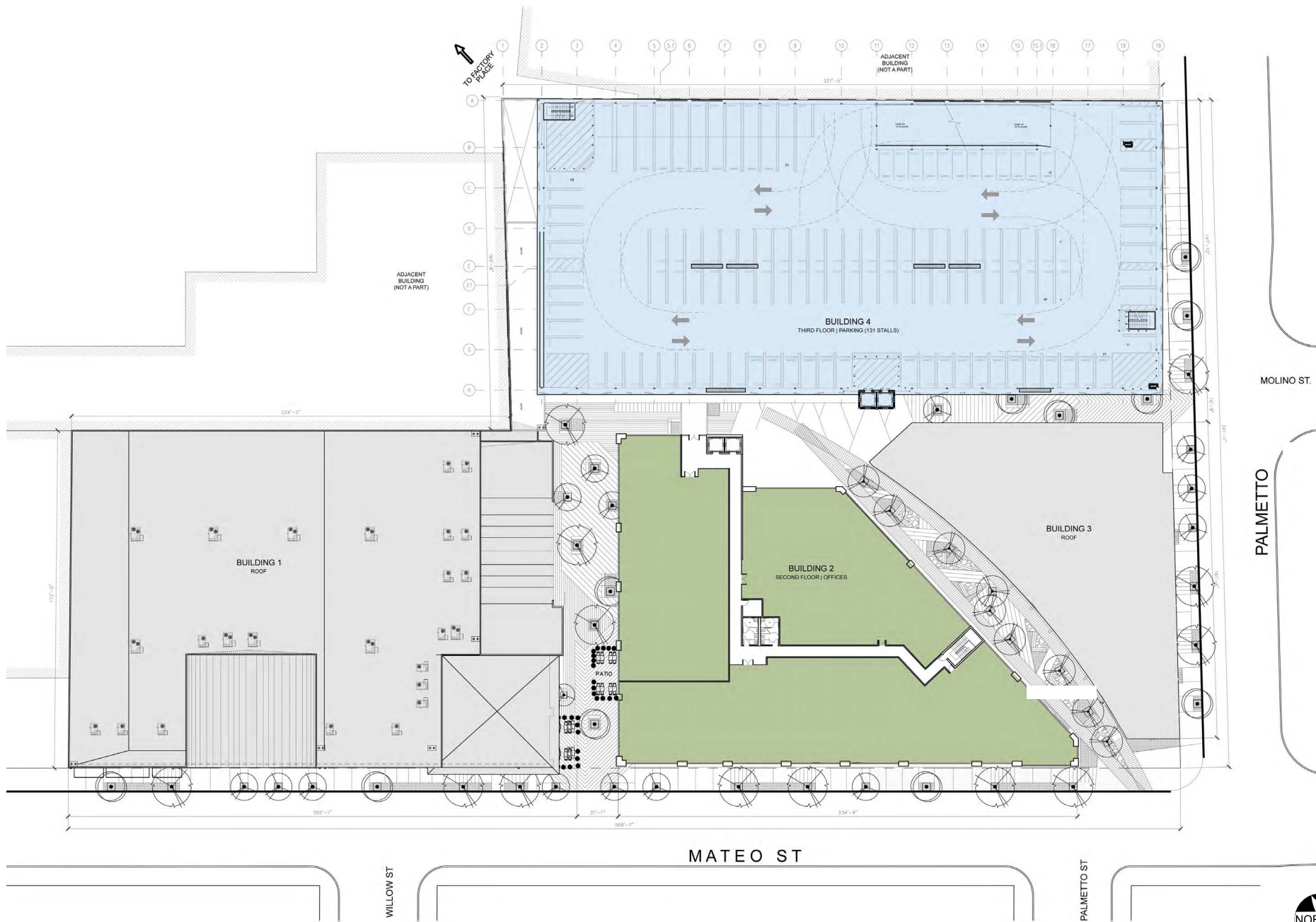
The Parking Exception in LAMC Section 12.21A4(x)(3)(6) permits two parking spaces per every 1,000 square feet of combined retail, office, and restaurant/café uses on any lot in any Enterprise Zone. This generates a parking requirement of 342 parking spaces to accommodate 170,906 square feet of floor area for the Project's proposed commercial uses of retail, restaurants and cafés. Pursuant to LAMC Section 12.21A16, the Project is required to provide 67 short-term bicycle parking spaces and 72 long-term bicycle parking spaces. As proposed, the Project would provide 540 automobile parking spaces (or 198 more than required by the LAMC), as well as 69 short-term bicycle parking spaces and 76 long-term bicycle parking spaces (or two more short-term and four more long-term spaces than required by the LAMC).



Source: EDGE Architecture/Planning, 2015.



Source: EDGE Architecture/Planning, 2015.



Source: EDGE Architecture/Planning, 2015.





Source: EDGE Architecture/Planning, 2015.



Source: EDGE Architecture/Planning, 2015.



Source: EDGE Architecture/Planning, 2015.

I. CONSTRUCTION

For purposes of analyzing impacts associated with construction, the environmental analysis presented in this document is based on a construction schedule of approximately 18 months. Construction activities associated with the Proposed Project would be undertaken in three main steps: (1) demolition/site clearing; (2) grading/site preparation; and (3) building construction/architectural coating. The building construction phase would include connecting utilities to the building, applying architectural coatings, paving, and landscaping the Project site.

The demolition/site clearing phase involves clearing the site of the structures that are to be demolished, walls/fences, pavement, and other existing surface materials. The majority of the demolition work has already been completed under separately issued permits. The remaining site clearing activities would require the use of a variety of construction equipment, including but not limited to the following: concrete/industrial saws; rubber tired dozers; and tractors/loaders/backhoes, and are expected to require approximately one month to complete.

The grading/site preparation phase would extend over an approximate three-month timeframe and would involve preparing the site for the subsequent building construction activities to follow. Construction equipment expected to be utilized during this phase would be similar to that identified above for the site clearing phase. Excavation of the site to provide the space for construction of the subterranean parking level (approximately 18 feet below grade) and other necessary utility infrastructure and to provide the structural support for the Project buildings would occur during this phase. Typical pieces of construction equipment and machinery involved in this phase include but are not limited to the following: scrapers, tractors, loaders, saws, hammers, and pneumatic tools.

As part of the site grading work, approximately 941.5 cubic yards of lead, cadmium, and TPH-impacted shallow soil will require removal from the site. The affected soil has been characterized as being no more than four feet below ground surface. All soil removal work would be undertaken in compliance with the Remedial Action Work Plan prepared for the Project site, to be approved by the California Department of Toxic Substances Control.

The building construction phase is expected to occur for approximately 18 months. Upon completion of the structures, architectural coating, finishing, and paving would occur. It is estimated that the application of architectural coatings and paving would occur over the final two months of the building construction phase. Typical pieces of construction equipment and machinery involved in this phase include, but are not limited to, a crane, cement/mortar mixers, forklifts, a generator set, tractors/loaders/backhoes, welders, air compressors, pavers, and a roller.

Construction activities may necessitate temporary lane closures on streets adjacent to the Project site on an intermittent basis for utility relocations/hook-ups, delivery of materials, and other construction

activities as may be required. However, site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible to mitigate any temporary impacts to the neighborhood and surrounding traffic. Construction equipment would be staged on-site for the duration of construction activities. Traffic lane and right-of-way closures, if required, would be properly permitted by the City agencies and would conform to City standards.

All construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 a.m. to 9:00 p.m. Monday through Friday, and between 8:00 a.m. and 6:00 p.m. on any Saturday or national holiday. No construction activities are permitted on Sundays. The Proposed Project would comply with these restrictions and would additionally restrict construction hours in order to mitigate construction noise impacts, as specified in Mitigation Measure 12-5.

Haul Route

Excavation of the site to allow for construction of the subterranean basement parking level in Building 4 would result in approximately 10,000 cubic yards of soil being removed from the area, including approximately 941.5 cubic yards of lead, cadmium, and TPH-impacted shallow soil. However, it is expected that all of the clean soil material would be reused elsewhere on the Project site, resulting in only the limited export of the contaminant impacted soil material during Project construction. All construction and demolition debris would be recycled to the maximum extent feasible. Demolition debris that cannot be recycled or diverted would be hauled to the Sunshine or Chiquita Canyon landfills, which accept construction and demolition debris and inert waste from areas within the City of Los Angeles. The Sunshine Canyon Landfill is approximately 30 miles north of the Project Site (approx. 60 miles round trip). The Chiquita Canyon landfill is approximately 43 miles to the north of the Project Site (approx. 86 miles round trip). For recycling efforts, the Central L.A. Recycling Center and Transfer Station (Browning Ferris Industries) accepts construction waste for recycling and is located approximately 1.8 miles from the Project Site (approx. 3.6 miles round trip).

The haul routes to and from the Project site would generally include:

- 6th Street to Alameda Street to US-101 freeway to CA-170 freeway to I-5 freeway to Sepulveda Boulevard to San Fernando Road to Sunshine Canyon Landfill (for demolition and construction debris).
- 6th Street to Alameda Street to US-101 freeway to CA-170 freeway to I-5 freeway to CA-58 to Lokern Road to Clean Harbors Buttonwillow Landfill (for contaminated soil materials).

J. DISCRETIONARY ACTIONS

The Project would require approval of discretionary actions by the City of Los Angeles, which may include the following:

1. Pursuant to LAMC Section 16.05, the Applicant requests the approval of Site Plan Review findings for a development project, which results in any change of use other than to a Drive-Through Fast-Food Establishment or to a Fast-Food Establishment which results in a net increase of 1,000 or more average daily trips as determined by, and using the trip generation factors promulgated by, the Department of Transportation.
2. Pursuant to L.A.M.C. Section 12.24, the Applicant requests the approval of a Master Conditional Use Permit – Alcohol (CUB) to permit the sale and dispensing of full-line alcoholic beverages for on- and off-site consumption in conjunction with 49,575 square feet of restaurant/retail space (up to one off-site sale use and 14 on-site sales uses).

In addition, the Project would require approval of the Remedial Action Work Plan (RAW) by the California Department of Toxic Substances Control (DTSC). The RAW is required to guide the excavation and removal of the lead, cadmium, and TPH-impacted soil that has been identified and characterized on-site. This IS/MND is intended to cover the removal of the contaminated soil materials and approval of the RAW by the DTSC.

Pursuant to various Sections of the LAMC, various approvals and permits from the Building and Safety Department (and other municipal agencies) for project construction activities including, but not limited to the following: demolition, grading, foundation, and building improvements would be requested. Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate in order to execute and implement the Project. Other responsible governmental agencies may also serve as a responsible agency for certain discretionary approvals associated with the construction process, which include, but are not limited to, the South Coast Air Quality Management District (construction-related air quality emissions) and the Regional Water Quality Control Board, Los Angeles Region (construction-related water quality).

K. CUMULATIVE DEVELOPMENT PROJECTS

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

“(1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. “Cumulatively considerable” means that the incremental effects of an individual project are

significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

(2) A lead agency may determine in an initial study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.

(3) A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.

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

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

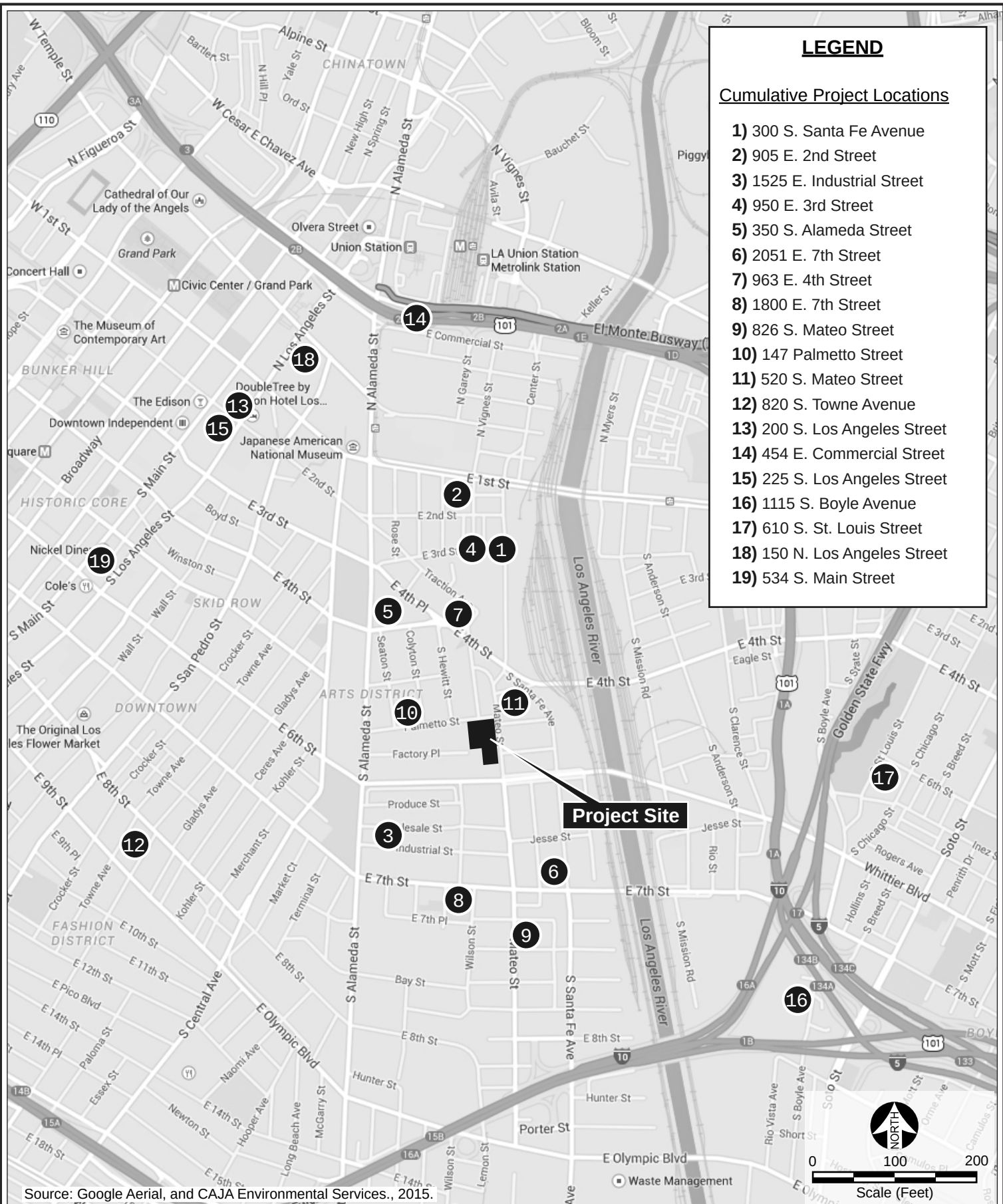
The cumulative development projects identified are included in Table II-3. A total of 19 cumulative projects were identified within a one-mile radius of the proposed Project. An analysis of the cumulative impacts associated with these other projects and the proposed Project is provided under each individual environmental impact category in Section IV of this IS/MND. The locations of the cumulative projects are shown in Figure II-11, Cumulative Projects Location Map.

Table II-3
List of Cumulative Development Projects

Project Number	Location/Address	Project Description	Number	Units
1	300 S. Santa Fe Avenue	Apartments	420	du
		Retail	60,000	sf
2	905 E. 2 nd Street	Condominiums	320	du
		Retail	18,712	sf
3	1525 E. Industrial Street	Apartments	240	du
		Retail	11,275	sf
4	950 E. 3 rd Street	School	532	students
		Retail	30,062	sf
		Apartments	635	du
5	350 S. Alameda Street	Apartments	60	du
		Retail	3,000	sf
6	2051 E. 7 th Street	Apartments	240	du
		Retail	20,000	sf
7	963 E. 4 th Street	Office	78,600	sf
		Retail	45,000	sf
8	1800 E. 7 th Street	Apartments	122	du
		Retail	8,662	sf
9	826 S. Mateo Street	Condominiums	90	du
		Retail	16,600	sf
10	1147 Palmetto Street	Apartments	234	du
		Restaurant	14,018	sf
11	520 S. Mateo Street	Apartments	350	du
		Retail	28,000	sf
12	820 S. Towne Avenue	School	505	students
13	200 S. Los Angeles Street	Residential	850	du
		Retail	50,000	sf
14	454 E. Commercial Street	Maintenance Facility	2	acres
15	225 S. Los Angeles Street	Condominium	300	du
		Retail	3,400	sf
16	1115 S. Boyle Avenue	Warehouse	294,256	sf
		General Office	76,576	sf
		Manufacturing	65,949	sf
17	610 S. St. Louis Street	Condominium	97	du
		Medical Office	33,000	sf
18	150 N. Los Angeles Street	Office	712,500	sf
		Retail	35,000	sf
		Child Care Facility	2,500	sf
19	534 S. Main Street	Residential	160	du
		Retail	25,000	sf

Note: du = dwelling units; sf = square feet

Source: City of Los Angeles, Department of Transportation



CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY
and CHECKLIST
(CEQA Guidelines Section 15063)

LEAD CITY AGENCY: City of Los Angeles	COUNCIL DISTRICT: CD 14 - JOSE HUIZAR	DATE: 08/13/2015
RESPONSIBLE AGENCIES: Department of City Planning		
ENVIRONMENTAL CASE: ENV-2014-3948-MND	RELATED CASES: DIR-2014-3947-SPR	
PREVIOUS ACTIONS CASE NO.:	☐ Does have significant changes from previous actions. ☐ Does NOT have significant changes from previous actions	
PROJECT DESCRIPTION: CONSTRUCTION OF ONE AND TWO STORY COMMERCIAL/RETAIL PROJECT WITH ASSOCIATED PARKING.		
ENV PROJECT DESCRIPTION: The Project Site is generally located on the southwest corner of Mateo Street and Palmetto Street in the Central City North Community Plan Area of the City of Los Angeles. The Project Site is bounded on the north by Palmetto Street, on the east by Mateo Street, and on the south and west by existing industrial warehouse uses. The total area of all the parcels that compose the Project site is approximately 154,736 square feet (or 3.55 acres). The Project Site is zoned M3-1-RIO (Heavy Industrial Zone, Height District 1, Los Angeles River Improvement Overlay) and the General Plan land use designation for the Site is Heavy Industrial. The Site formerly contained three adjacent industrial warehouse buildings, one of which included rooftop parking. Most of these structures have recently been demolished. The Project proposes to incorporate a portion of the building located at 581 S. Mateo. The Project would develop a 153,000 square foot retail center, consisting of 103,422 square feet of retail space and 49,578 square feet of restaurant space in Buildings 1-4. Project Building 4 would consist of ground level retail with three levels of above grade parking and one subterranean level used for loading/parking. The Project will require approval of the following discretionary actions: 1. Pursuant to L.A.M.C. Section 16.05, the Applicant requests the approval of Site Plan Review findings for a development project, which results in any change of use other than to a Drive-Through Fast-food Establishment or to a Fast-food Establishment which results in a net increase of 1,000 or more average daily trips as determined by, and using the trip generation factors promulgated by the Department of Transportation. 2. Pursuant to L.A.M.C. Section 12.24, the Applicant requests the approval of a Master Conditional Use Permit – Alcohol (CUB) to permit the sale and dispensing of alcoholic beverages for on- and off-site consumption in conjunction with 49,578 square feet of restaurant/retail space (one off-site sale use and 11 on-site sales uses, all full-line). 3. Pursuant to various sections of the L.A.M.C., the Applicant will request approvals and permits from the Building and Safety Department (and other municipal agencies) for project construction actions including, but not limited to, the following: demolition, excavation, shoring, grading, foundation, and building and tenant improvements.		
ENVIRONMENTAL SETTINGS: The location of the proposed At Mateo development ("Project" or "Proposed Project") at 555/581 S. Mateo Street and 1248/1262 E. Palmetto Street ("Project Site") is within the downtown Los Angeles Arts-in-Residence District, within the boundaries of the Central City North Community Plan Area. The Project Site is located along Mateo Street at the southwest corner of Palmetto Street and Mateo Street and includes approximately 154,736 square feet (or 3.55 acres) of lot area, and is generally bounded on the north by Palmetto Street, on the east by Mateo Street, and on the south and west by existing industrial warehouse uses.		
PROJECT LOCATION: 555 and 581 SOUTH MATEO STREET AND 1248 AND 1262 EAST PALMETTO STREET		

COMMUNITY PLAN AREA: CENTRAL CITY NORTH STATUS: ☒ Does Conform to Plan ☐ Does NOT Conform to Plan	AREA PLANNING COMMISSION: CENTRAL	CERTIFIED NEIGHBORHOOD COUNCIL: HISTORIC CULTURAL
EXISTING ZONING: M3-1-RIO	MAX. DENSITY/INTENSITY ALLOWED BY ZONING: N/A	LA River Adjacent:
GENERAL PLAN LAND USE: HEAVY MANUFACTURING	MAX. DENSITY/INTENSITY ALLOWED BY PLAN DESIGNATION: N/A	
	PROPOSED PROJECT DENSITY: N/A	

Determination (To Be Completed By Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

City Planning Associate

Title

(213) 978-1372

Phone

Evaluation Of Environmental Impacts:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses may 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 whatever format is selected.
9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance.

Environmental Factors Potentially Affected:

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

☒ AESTHETICS	☐ GREEN HOUSE GAS EMISSIONS	☐ POPULATION AND HOUSING
☐ AGRICULTURE AND FOREST RESOURCES	☐ HAZARDS AND HAZARDOUS MATERIALS	☐ PUBLIC SERVICES
☒ AIR QUALITY	☐ HYDROLOGY AND WATER QUALITY	☐ RECREATION
☐ BIOLOGICAL RESOURCES	☐ LAND USE AND PLANNING	☒ TRANSPORTATION/TRAFFIC
☒ CULTURAL RESOURCES	☐ MINERAL RESOURCES	☒ UTILITIES AND SERVICE SYSTEMS
☒ GEOLOGY AND SOILS	☒ NOISE	☐ MANDATORY FINDINGS OF SIGNIFICANCE

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

Background

PROPONENT NAME:

ASB/BLATTEIS PALMETTO, LLC

PHONE NUMBER:

() -

APPLICANT ADDRESS:

1940 CENTURY PARK EAST, #200
LOS ANGELES, CA 90067

AGENCY REQUIRING CHECKLIST:

Department of City Planning

DATE SUBMITTED:

10/22/2014

PROPOSAL NAME (if Applicable):

AT MATEO

ENVIRONMENTAL IMPACTS

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

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a scenic highway?	☐	☐	☐	☒
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☒	☐	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐
2. 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. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict the existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined 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))?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
3. AIR QUALITY. The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:				
a. Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan?	☐	☐	☒	☐
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒	☐	☐
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment(ozon, carbon monoxide, & PM 10) under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e. Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
4. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the local or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance(e.g., oak trees or California walnut woodlands)?	☐	☐	☐	☒
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?	☐	☐	☐	☒
5. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in significance of a historical resource as defined in <i>State CEQA Guidelines</i> §15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to <i>State CEQA Guidelines</i> §15064.5?	☐	☐	☒	☐
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐
d. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐
6. GEOLOGY AND SOILS. Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: 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.	☐	☐	☒	☐
b. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?	☐	☒	☐	☐
c. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?	☐	☐	☐	☒
e.	Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
f.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
g.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
h.	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?	☐	☐	☐	☒
7.	GREENHOUSE GAS EMISSIONS. 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 regulations adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐
8.	HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	☐	☐	☐	☒
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒
9. HYDROLOGY AND WATER QUALITY. Would the proposal result in:				
a. Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	☐	☐	☐	☒
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☐	☒
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	☐	☐	☐	☒
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f. Otherwise substantially degrade water quality?	☐	☐	☒	☐
g. Place housing within a 100-year flood plain as mapped on	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?	☐	☐	☐	☒
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j. Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
10. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒
11. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒
12. NOISE. Would the project:				
a. Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
13. POPULATION AND HOUSING. Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
14. PUBLIC SERVICES.				
a. 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:				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☒	☐
iv. Parks?	☐	☐	☒	☐
v. Other public facilities?	☐	☐	☒	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
15. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐
16. TRANSPORTATION AND TRAFFIC. Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☒	☐	☐
b. Conflict with an applicable congestion management program, including but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e. Result in inadequate emergency access?	☐	☐	☐	☒
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒
17. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☒	☐	☐
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g. Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐
18. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	☐	☐	☒	☐
c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐


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

PREPARED BY	TITLE	TELEPHONE #	DATE
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IV. ENVIRONMENTAL IMPACT ANALYSIS

This section of the Initial Study contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines [C.C.R. Title 14, Chapter 3, 15000-15387]). The analytical methodology and thresholds of significance are based on the *L.A. CEQA Thresholds Guide*.

1. AESTHETICS

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

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the Project were to introduce incompatible scenic elements within a field of view containing a scenic vista or substantially block views of a scenic vista.

The Project Site is located in the Central City North community of the City of Los Angeles (the City) and within the Artists-In-Residence District (Arts District). The existing visual character of the surrounding locale is typical of a dense urban area with multi-story buildings, single-story warehouses, and open surface parking lots along Mateo and Palmetto Streets. Views in the vicinity of the Project site are largely constrained by structures on adjacent parcels, and the area's relatively flat topography. The Project site Photo Exhibit in Appendix A presents photographs of the site's current condition from a variety of vantage points along public streets adjacent to the property.

Viewsheds refer to the visual qualities of the geographical area that is defined by the horizon, topography, and other natural features that give an area its visual boundary and context, or by artificial developments that have become prominent visual components of an area. Views in the vicinity of the Project site are largely constrained by the existing structures in the area, as well as the area's relatively flat topography. There are no tall or topographic features on the site from which scenic vistas may be obtained, or which make up part of the scenic landscape of the surrounding community. The Project site is not located within or along a designated scenic corridor, and no scenic views exist from or through the developed Project site.

The height of the Proposed Project would be compatible with that of nearby commercial and industrial uses, and would not be significantly greater than that of the existing structures on-site. The Project would improve the site with a new retail and office development, resulting in the construction of four above-grade buildings, ranging in height from one to four and one-half levels (the half-level is uncovered rooftop parking), with a pedestrian entry plaza located at the southwest corner of the intersection of Palmetto and Mateo Streets. The Project would alter the existing views and character of the Project site and the immediately surrounding area by replacing one-story industrial warehouse buildings with three one- to three-story retail/creative office buildings and one building of four and one-half levels which includes the parking structure above ground-floor retail.

The Project would comply with the goals and design principles of the Central City North Community Plan (Community Plan). The Community Plan describes the standards that need to be met for site planning, setbacks, scale, massing, architectural design (materials, windows, glare, and lighting) and other characteristics (for additional detail, see Question 1(c) below). The Project would be designed to incorporate the architectural style of brick industrial warehouse buildings, thereby creating a development that does not reduce the integrity and viability of existing industrial areas. The Project is to be located within the boundaries of the Arts District, which the City has recognized is suitable for the type of commercial development that complements the industrial character of the area. The Project would be compatible with existing and ongoing redevelopment of commercial, mixed-use, and residential uses within the Arts District.

The Project would also comply with the design guidelines established by the Department of City Planning for Pedestrian-Oriented/Commercial and Mixed Use projects. Compliance with these guidelines, while not mandatory, is intended to promote the consideration of neighborhood context and linkages in building and site design, promote the use of high quality architecture to define the character of commercial districts, augment the streetscape environment with pedestrian amenities, minimize the appearance of driveway and parking areas, include open space to create opportunities for public gathering, and reduce visual clutter along streetscapes. The Project would be consistent with nearly all of the applicable individual methodologies identified within the City's design guidelines for attaining these objectives (for additional detail, see Question 1(c) below).

Because the Project would comply with the applicable design guidelines, it would not introduce incompatible visual elements on the Project site or visual elements that would be incompatible with the character of the area. Therefore, the Project would be visually compatible with the surrounding developed properties, and would be consistent with the revitalization of several other commercial and mixed-use developments in the Arts District.

As there are no designated scenic vistas in the local area, the Project would not block scenic vistas, and impacts would be less than significant.

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

No Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact would occur if scenic resources would be damaged and/or removed by development of a project. The Project site does not contain any scenic resources. The Project site is currently developed with industrial warehouse buildings and surface parking areas. The Project site is not identified as a local, state or national historic resource.¹

¹ City of Los Angeles Department of Planning, *Zone Information and Map Access System*, website: <http://zimas.lacity.org/>, accessed January 2015.

There is no significant vegetation or unique geologic features on-site. The Project site is not bordered by or within the viewshed of any designated scenic highway. Additionally, the streets serving and surrounding the Project site, including Mateo Street and Palmetto Street, are not officially designated State or County scenic highways. Therefore, the Project would not damage and/or remove any scenic resources, and no impact would occur.

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Potentially Significant Unless Mitigation Incorporated. Based on the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to introduce incompatible visual elements on the Project site or visual elements that would be incompatible with the character of the area surrounding the Project site.

Character of Surrounding Community

The Project site is located in the Arts District, as identified in the Central City North Community Plan. Updated in December 2000, the Community Plan describes the Arts District as bounded by 1st Street to the north, the Los Angeles River to the east, 6th Street to the south, and Alameda Street to the west. This area has experienced substantial residential and commercial growth in the past decade. Residential and mixed-use projects that have been approved and/or developed in the vicinity of the Project site include the One Santa Fe project, located on the east side of Santa Fe Avenue across from SCI-Arc; the Molino Lofts; the Barker Block Lofts; Toy Factory Lofts; 2121 Lofts; the Factory Place Arts Complex; and the Biscuit Company Lofts. Well-known restaurants and drinking establishments, such as Wurstkuche, Americano, Church & State, Blue Bottle Coffee, Villains Tavern, Poketo, Tony's Saloon, and Angel City Brewery are located in the Arts District along with a variety of eclectic shops and galleries. The Arts District is also home to SCI-Arc, a prominent school of architecture, and also the Los Angeles offices of the Daily Journal, California's legal daily newspaper.

On March 5, 2008, the City Council, via Council Motion, approved updating and expanding the geographical boundaries of the Arts District in the Central City North Community Plan to include the areas south of 6th Street, including Violet Street and the areas between Mill Street and Wilson Street to the west and the Los Angeles River to the east. The Arts District expansion was in response to the significant growth in mixed-use residential and commercial development south of 6th Street in recent years. The Factory Place Arts Complex, located on the north side of 6th Street and in close proximity to the Project site, includes 188 residential loft units, with ground floor retail and commercial uses and a 9,000-square foot event space. The area south of 6th Street to the east of Alameda Street includes other residential developments, including 2121 Lofts located at Santa Fe Avenue and 7th Place, and the Biscuit Company Lofts and Toy Factory Lofts located on Industrial Street.

The site is surrounded by M3-1-RIO zoned properties to the north, south, east and west. The surrounding properties include a mix of industrial, commercial, mixed-use, and residential projects. The Barker Block Lofts and Molino Lofts are adaptive reuse projects located across Palmetto Street to the north of the Project site. These lofts include joint live/work units and commercial space. To the south, along the north side of 6th Street and to the west of Mateo Street, the Factory Place Arts Complex includes ground floor retail and commercial uses along with residential lofts. The Los Angeles Gun Club is located on the north side of 6th Street southwest of the Project site. To the south of 6th Street and across Mateo Street to the east of the site are numerous markets, cafés, restaurants and other amenities easily accessible to persons working and living in the surrounding neighborhood. Warehouse buildings are located immediately to the south and west of the site. In general, the Project area is characterized by dense downtown contextual development consisting of a mixture of some multi-family housing along with predominately commercial and various industrial uses, as well as retail uses. Residential uses within the vicinity generally have heights that are consistent with mid-rise buildings near the downtown core of Los Angeles, with the average number of residential units per structure at roughly 69 units.² The neighboring commercial and industrial developments are generally low- to mid-rise in height.

The Project is designed to be compatible with the existing and future development of neighboring properties, and to be consistent with the City's vision of the Arts District in the Central City North Community Plan. The Arts District is described in the Community Plan as "primarily made up of old warehouses now converted to artists lofts and studios." In recent years, former industrial and warehouse buildings, adjacent to the Project site, have been restored and converted to residential uses and joint live/work quarters. The Project would be designed for compatibility with these converted industrial and warehouse buildings. The Project's proposed architectural style reflects the industrial quality of the immediate neighborhood. The Project would create a development that is consistent in both design and land use with other existing development in the Central City North area. The Project would be compatible with and complementary to the surrounding area because it would consist of retail, creative office, and restaurant uses capable of serving the growing residential population of the area. The Project would also contribute to the ongoing revitalization of the area by replacing underutilized warehouse buildings with a pedestrian-oriented retail complex within a series of buildings linked by paseos and designed to be visually complementary with neighboring industrial architecture within the site's vicinity.

Building Heights and Massing

With respect to building mass and height, land uses in the Project vicinity vary in use and height. The Project Site is located in Height District No. 1, which does not specify a height restriction. The proposed Project would be one to four and one-half stories in height above street grade, reaching a maximum height of 67 feet above street grade at the top of a parking structure elevator tower in the interior portion of the

² Central City North Community Plan: cityplanning.lacity.org/complan/pdf/ccncptxt.pdf

site. Immediately surrounding the Project site are industrial, residential, and commercial buildings approximately one to six stories above grade and surface parking lots. Within a few blocks radius of the Project site, there are commercial retail, office, restaurant, parking, industrial, and residential land uses ranging in height from one to eight stories above grade.

The bulk, mass and height of the Project's commercial buildings is designed to be compatible and complementary to the other industrial buildings in the immediate vicinity, including the Barker Block Lofts and Molino Lofts to the north of Palmetto Street. Variation in materials and breaks and recesses in the building would be used to articulate all facades facing Mateo Street and Palmetto Street. The Project is proposed to reach a maximum height of 55 feet along the Palmetto Street frontage, at the top of the proposed parking structure (Building 4). The remaining commercial portions of the Project, in one- to three-story buildings (Buildings 1-3) front on both Palmetto Street and Mateo Street, with the intersection of these two streets containing an outdoor paseo that creates a diagonal passageway for pedestrians to walk through the Project site. Commercial building heights along the Mateo and Palmetto Street frontages of the Project would range between 31 and 52 feet above street grade, as shown on the building elevations and renderings in Figures II-5 through II-13.

Consistent with the site's industrial zoning, the commercial buildings fronting on Palmetto Street and Mateo Street would have a 0-foot setback. The side and rear yard setbacks would also be 0-foot. The rear portion of the site that adjoins an access easement to Factory Place would allow for the proposed paseo to connect to Factory Place, facilitating pedestrian activity from adjoining properties.

The massing and height of the proposed Project would be compatible with the height of other buildings within the immediate viewshed of the site. Therefore, the Project's scale and massing would be compatible with the surrounding urban form, and visual impacts associated with building height and massing would be less than significant.

Architectural Style and Design

The Project site is located in an urbanized and fully developed portion of the City. The built environment is characterized by a variety of architectural styles, age of buildings, type of development, and size. Building designs include mid-century modern, current modern, and historic. Uses include residential, retail, commercial, industrial and public uses, office, cultural and recreation. The Project would comply with the goals and design principles of the Central City North Community Plan (Community Plan). The Community Plan describes the standards that need to be met for site planning, setbacks, scale, massing, architectural design (materials, windows, glare, and lighting) and other characteristics.

Residents of projects located on industrial land are typically accustomed to their proximity to a mix of commercial and industrial uses. The development of this commercial Project would provide attractive amenities for nearby residents and would thus help to achieve a better transition between commercial and residential uses than now exists. Because residents of these developments will be drawn to the

restaurants, retail and creative office uses to be offered by the Project, pedestrian activity is likely to increase, as residents would be drawn to the Project's pedestrian-friendly environment, thus creating a more adequate transition between commercial and residential uses. While projects in the industrial zone are not required to provide landscaping, the Project would be developed with open-to-the-sky paseos that would include trees, planters, and landscaping to create an inviting pedestrian experience. The Project proposes an architectural character and scale that is compatible with and reflects the character of the existing neighboring brick warehouse buildings, some of which have been converted to live/work units.

The Project seeks to create a pedestrian friendly shopping environment with its ground floor retail space oriented either to the street frontages on Palmetto and Mateo Streets or to the paseos that traverse the Project site. The paseos are intended to create an inviting pedestrian environment by incorporating trees, seating areas and benches, and attractive landscaping in various styles of planters. The majority of retail and restaurant frontage in the Project would be provided at ground level. Even the second level restaurant space (in Building 3) would be oriented to the street and the paseo. The Arts District, by virtue of its proximity to the central business district, draws many workers from downtown that come to enjoy restaurants, cafés, and bars in the community. The Project site's proximity to downtown would likely also draw visitors and office tenants from both the large daytime population of those working in the central city and the increasing residential population of the Arts District to enjoy the new shopping and dining amenities to be provided by the Project. The Arts District is an appealing location for new businesses that are developed in projects that respect the architectural integrity of the industrial character of the neighborhood. The Project would be designed with a high level of quality and distinctive character that is compatible with the existing industrial and commercial uses. The Project would be designed with brick facades that complement the existing brick warehouse buildings located across from the Project site on Palmetto Street and Mateo Street, as is shown in Figures II-9 through II-13. The design of the Project would thus be compatible with the neighboring existing uses.

The Project has been designed to enhance the existing pedestrian activity along Palmetto Street and Mateo Street, with the addition of new commercial uses fronting on these streets. Moreover, the design of the Project seeks to maximize pedestrian activity by creating open-to-the-sky paseos that traverse the project site, inviting more pedestrian activity on the site as well as on the adjacent streets. Additionally, the paseo would connect, through an easement, to an entrance at the rear of the property located on Factory Place, thereby allowing pedestrian access from areas to the west of the Project site. As has been discussed, the Arts District is evolving into a dynamic mixed-use area with numerous restaurants, cafés, taverns, gallery spaces, studios, breweries, and boutique retail shops. Increasingly, patrons walk to different venues and uses in the Arts District. Development of the Project would further enhance the pedestrian connections in the area and the public realm along Palmetto Street and Mateo Street and would connect to the many mixed-use residential and commercial developments located within the surrounding community, including the Barker Block Lofts, Molino Lofts, Factory Place Arts Complex, Biscuit Company Lofts, Mill Street Lofts, 2121 Lofts, and Toy Factory Lofts.

Policies in the Community Plan promote the concept that "any proposed development be designed to

enhance and be compatible with adjacent development.” The Project would be designed with an architectural style complementary to the industrial character of the neighborhood. Street frontages of the Project would have brick façades in order to complement the neighboring industrial buildings, some of which have been converted to joint live/work units. Chapter V of the Community Plan, Urban Design, has established design guidelines to define the minimum level of design that shall be observed in multiple residential, commercial, and industrial projects within the entire Plan area. With respect to site planning of commercial projects, the policies in the Community Plan design guidelines state that structures shall be oriented toward the main commercial street where a parcel is located and shall avoid pedestrian/vehicular conflicts by:

- Maximizing retail and commercial service uses along frontages of commercial developments
- Providing front pedestrian entrances for businesses fronting on main commercial streets
- Providing through arcades from the front of buildings to rear parking for projects with wide frontages

The Project complies with these guidelines by maximizing its retail uses along the street frontages of Palmetto Street and Mateo Street. The 3.55-acre project site allows the development to achieve a significant presence on both streets, with an approximate street frontage of 341 lineal feet on Palmetto Street (the small parcel located immediately adjacent to the Project site to the north along the south side of Palmetto Street that is owned by the City and is currently used for perpendicular street parking would not be encroached upon) and an approximate street frontage of 568 lineal feet on Mateo Street. The street frontage is also maximized by the Project occupying the intersection of both streets. The majority of the commercial businesses within the Project would front on these main commercial streets and on the paseos, thereby providing front pedestrian entrances for most businesses. In addition, the paseo would provide a through arcade from the intersection of Palmetto and Mateo Streets, crossing the Project site diagonally in order to access the parking structure at the rear as well as the pedestrian entrance connecting to Factory Place. The elevators located along the paseo would provide the only direct pedestrian access to the parking structure.

In summary, the Project proposes a high quality development that would be compatible with the industrial character of the neighborhood and would be an attractive destination for local residents and workers. The existing uses of the Project site are vacant and underutilized warehouse buildings and surface parking areas that are primarily used for storage. The existing structures and improvements on the site are aging and outmoded. The removal of most of these improvements as part of the Project (with the exception of incorporating sections of the warehouse buildings along the Mateo Street frontage) would improve the overall aesthetic environment at the site. Because the Project would comply with the design guidelines of the Community Plan, it would not introduce incompatible visual elements to the Project site or visual elements that would be incompatible with the character of the area.

Other Visual Considerations

Although it is not required in the M3 zone, the Project would include approximately 15,000 square feet of open space corridors in open-to-sky paseos that would feature landscaping in trees and planters. These paseos would provide open space for pedestrians walking through the Project site to access the upper-level creative office spaces, the various ground floor retail shops, restaurants, and cafés. The paseos would be designed to promote public use by including seating areas and benches.

The River Improvement Overlay (RIO) District 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. Because the proposed Project involves the redevelopment of the site, it will need to obtain administrative clearance from the Department of City Planning illustrating compliance with the RIO landscaping and design standards. As currently proposed, the landscaping proposed for the Project would comply with the design standards identified in the RIO.

Loading and trash collection areas would be provided in the Project consistent with Code requirements. Trash room and trash enclosure areas would be provided for the commercial uses of the Project, but generally shielded from off-site viewing. Two loading areas for the convenience of the Project's commercial users would be provided; one at the southern end of the Project site on Mateo Street and the other located on the ground floor level of the building on Palmetto Street, next to the driveway accessing the parking levels above. As with the trash collection areas, these loading areas would be screened from public view.

During construction and operation, the Project would have the potential to degrade the aesthetics of the surrounding environment if the Project site is not kept up in an orderly fashion with respect to vandalism, graffiti, signage, and landscaping. Implementation of Mitigation Measures 1-1 and 1-2 would ensure that these potentially significant impacts are reduced to a less than significant level.

Mitigation Measures:**1-1 Aesthetics (Landscape Plan)**

- All open areas not used for buildings, driveways, parking areas, recreational facilities or walkways shall be attractively landscaped and maintained in accordance with a landscape plan and an automatic irrigation plan, prepared by a licensed Landscape Architect and to the satisfaction of the Department of City Planning.

1-2 Aesthetics (Signage on Construction Barriers)

- The applicant shall affix or paint a plainly visible sign, on publicly accessible portions of the construction barriers, with the following language: "POST NO BILLS".

- Such language shall appear at intervals of no less than 25 feet along the length of the publicly accessible portions of the barrier.
- The applicant shall be responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project introduces new sources of light or glare on or from the Project site that would be incompatible with the areas surrounding the Project site, or would pose a safety hazard to motorists utilizing adjacent streets or freeways. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant nighttime illumination impact shall be made considering the following factors: (a) the change in ambient illumination levels as a result of project sources; and (b) the extent to which project lighting would spill off the project site and affect adjacent light-sensitive areas.

Urban glare is largely a daytime phenomenon occurring when sunlight is reflected off the surfaces of buildings or objects. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets in the vicinity of the Project site, exterior building windows, and surfaces of brightly painted buildings in the Project vicinity. Glare from building facades include those that are largely or entirely comprised of highly reflective glass or mirror-like material from which the sun reflects at a low angle in the periods following sunrise and prior to sunset. Building surfaces or glass windows have the potential to create glare, particularly during the early morning and later afternoon time periods.

Light

The surrounding area is illuminated by freestanding streetlights and lighting from the surrounding commercial and residential uses. Vehicle headlights from traffic on local surface streets also contribute to overall ambient lighting levels. In addition, Mateo Street is a local thoroughfare with consistent traffic that further contributes to the amount of ambient lighting.

Lighting for the Project would be provided in order to illuminate the building entrances, common open space areas, and parking areas, largely to provide adequate night visibility for residents and visitors and to provide a measure of security. Light would also emanate from the windows of the Project. It should be noted that a moderate degree of illumination already exists in the Project vicinity along Mateo Street and Palmetto Street from existing buildings, signage, and freestanding streetlights. The Project would not generate a substantial increase in ambient lighting as the area is urbanized and the majority of lighting would be shielded or hooded and directed towards the interior of the Project site and away from any nearby land uses to the extent feasible and consistent with safety and security requirements. In addition,

the Project would comply with the glare and lighting guidelines and standards of the Central City North Community Plan.

Vehicles travelling to and from the Project site would also generate light from headlights. Vehicular access to the Project site would be provided off of Palmetto Street. As such, vehicle headlights exiting from the parking structure would be directed towards the adjacent land uses on the north side of Palmetto Street. The properties facing the Project site along the north side of Palmetto Street are developed with live/work loft complexes that are considered to be light sensitive uses. No other light sensitive uses are located within a 500-foot radius of the Project site. Vehicles exiting the Project parking structure at night could cast headlight beams toward these off-site residential properties. However, as shown in Appendix A (see Photo 30), the Barker Block Lofts, which are directly opposite the proposed Project driveway location, do not have a significant number of ground-floor windows facing toward the Project site. In addition, the parking driveway grade would result in vehicle headlight beams being cast downward rather than upward toward the residences across Palmetto Street. Therefore, the potential for vehicle headlight beams to negatively affect residences within the Barker Block Loft complex is considered low. Thus, the Project would not introduce substantial new sources of light that are incompatible with the surrounding areas. Additionally, as noted in Mitigation Measure 1-3, below, the Project would include directional lighting with shielding to ensure outdoor parking areas and security lights do not cast excessive light on adjacent properties. Therefore, with mitigation, the Project's lighting impacts would be less than significant.

Glare

The Proposed Project includes an increase in window and building surfaces in comparison to the existing uses. As illustrated in Figures II-9 through II-13, the Project design includes a variety of exterior treatments, including glass, that would extend along the Mateo Street and Palmetto Street frontages. However, the glass that would be utilized in the portions of the building facades along the street frontages would either be of low-reflectivity or accompanied by a non-glare coating. Therefore, the Project would not introduce any new sources of glare that are incompatible with the surrounding areas. Additionally, as noted in Mitigation Measure 1-4, below, the architectural materials to be used will be limited to such materials that do not cause excessive glare. In addition, the Project will comply with the glare and lighting guidelines and standards of the Central City North Community Plan. Therefore, with mitigation, the Project's glare impacts would be less than significant.

Mitigation Measures:

1-3 Aesthetics (Light)

- Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above.

1-4 Aesthetics (Glare)

- The exterior of the proposed structures shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

Shade/Shadow

The issue of shade and shadow pertains to the blockage of direct sunlight by Project buildings, which may affect adjacent properties. Shading is an important environmental issue because the users or occupants of certain land uses, such as residences, recreational/parks facilities, churches, schools, outdoor restaurants, and pedestrian areas have some reasonable expectations for direct sunlight and warmth from the sun. These land uses are termed “shadow-sensitive.”

Shadow lengths are dependent on the height and size of the building from which they are cast and the angle of the sun. The angle of the sun varies with respect to the rotation of the earth (i.e. time of day) and elliptical orbit (i.e. change in seasons). The longest shadows are cast during the winter months and the shortest shadows are cast during the summer months.

Impact Criteria for City of Los Angeles

An impact would normally be considered significant if shadow-sensitive uses would be shaded by Project-related structures for more than three hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time (between early April and late October). Structures less than 60 feet in height are normally not expected to create shading impacts on off-site properties.

According to the *L.A. CEQA Thresholds Guide*, “facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors.” These land uses are termed “shadow-sensitive” because sunlight is important to function, physical comfort or commerce.

Project Impacts

Based on a survey of the adjacent land uses within the potential shadow envelope of the Project, there are no shadow-sensitive uses to the west or south of the site. These properties contain industrial and surface parking uses, neither of which is considered sensitive to the effects of shading. Shadow-sensitive uses are located to the north of the Project site across Palmetto Street (live/work lofts) and, potentially, to the east across Mateo Street in the form of some outdoor dining areas associated with a coffee establishment.

Shadow impacts are typically greatest during the winter months due the sun’s low position in the sky, with the resultant longer shadows stretching roughly from the northwest to the northeast during daytime

hours. Because shadows in the Northern Hemisphere trend to the north during the winter, shading caused by Project buildings would be cast to the north. Summertime shadows would be the smallest in extent and would be cast primarily from the west to the east of the site over the course of a day.

Although shadow-sensitive uses are located to the north and east of the Proposed Project, the majority of the Project structures would be less than 60 feet in height. The tallest component of the Project would reach 67 feet at a parking structure stairwell in the center of the site. Building heights along the street frontages of the Project would range between 31 and 55 feet above street grade, as shown on the building elevations and renderings in Figures II-5 through II-13. Coupled with the adjacent street widths and the resultant overall distance between the proposed structures and the off-site shadow-sensitive land uses, shading resulting from the Project would not produce off-site impacts during the winter or summer shading environments. Therefore, the Project would not have the potential to significantly impact any shadow-sensitive land uses and the Project would result in no impact with respect to shade and shadows.

Cumulative Impacts: Aesthetics

Less Than Significant Impact. Development of the Project in conjunction with the cumulative development proposals identified by the City would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. Development of these cumulative projects is expected to occur in accordance with adopted plans and regulations, including the design standards of the Community Plan. With respect to the overall visual quality of the surrounding neighborhood, each of the cumulative projects would be subject to site plan review and/or other planning approvals by the Director of Planning or other City decision-maker for review and approval. The City approval process would ensure each project is designed and constructed in a manner that is consistent with and compatible with the existing urban form and character of the surrounding environment. Therefore, cumulative aesthetic impacts would be less than significant.

2. AGRICULTURE AND FORESTRY RESOURCES

- 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. According to the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The Project site is currently occupied by industrial warehouses and parking lots. No farmland or agricultural activity exists on or in the vicinity of the Project site. According to the Soil Candidate Listing for Prime Farmland of Statewide Importance, Los Angeles County, which was prepared by the U.S. Department of Agriculture Natural Resources Conservation Service (NRCS), the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. In addition, the Project site has not been mapped pursuant to the Farmland

Mapping and Monitoring Program of the California Resources Agency. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of “Important Farmland” in California. The Project site is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.³ Therefore, the Project would have no impact on the conversion of farmland to non-agricultural uses.

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

No Impact. According to the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to non-agricultural use. The Williamson Act of 1965 allows local governments to enter into contract agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.⁴ The Project site does not contain any State-designated agricultural lands or open space. Thus, the Project site is not subject to a Williamson Act Contract.

The Project site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the LAMC. The Project site is currently zoned M3-1-RIO and has a land use designation of Heavy Industrial in the Central City North Community Plan. The Project site is not zoned for agricultural production, and there is no farmland at the Project site. In addition, no Williamson Act Contracts are in effect for the Project site. Therefore, no impact with respect to land zoned for agricultural use or under a Williamson Act Contract would occur.

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. The Project site is zoned M3-1-RIO and has a land use designation of Heavy Industrial in the Central City North Community Plan. Neither the Project site nor the surrounding parcels are zoned for forest land or timberland, and there is no Timberland Production at the Project site. Therefore, no impact related to loss or conversion of forest land or timberland would occur.

³ State of California Department of Conservation, *Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2010, Map*, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf>, accessed February 2015.

⁴ State of California Department of Conservation, *Williamson Act Program*, website: <http://www.conservation.ca.gov/dlrp/lca/Pages/index.aspx>, February 2015.

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

No Impact. The Project site is occupied by industrial warehouses and is completely surrounded by urban uses and infrastructure. No forested lands or significant natural vegetation exist on or in the vicinity of the Project site. No impact related to the loss of forest land or conversion of forest land would occur.

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. According to the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project results in the conversion of farmland to another non-agricultural use. Neither the Project site, nor nearby properties, are currently utilized for agricultural or forestry uses and, as discussed above (Section 2(a)), the Project site is not classified in any “Farmland” category designated by the State of California. According to the City General Plan Conservation Element, the Project site is not located near or in any significant farmland area (i.e., a significant commercial crop or animal producing site). No impacts related to the conversion of farmland to a non-agricultural use, or conversion of forest land to a non-forest use would occur as a result of the Project.

Cumulative Impacts: Agricultural/Forestry Resources

No Impact. Development of the Project in conjunction with the cumulative development in the vicinity identified by the City would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. Collectively, the projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of forested land or conversion of forested land to non-forest use. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project site and the surrounding area are not included in the Important Farmland category.⁵ The Project site is located in an urbanized area in the City and does not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact to agricultural or forestry resources would occur.

⁵ State of California Department of Conservation, Division of Land Resource Protection, *Farmland Mapping and Monitoring Program*.

3. AIR QUALITY

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant air quality impact may occur if the Project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to implementing the policies or obtaining the goals of that plan. In the case of projects proposed within the City of Los Angeles or elsewhere in the South Coast Air Basin (Basin), the applicable plan is the Air Quality Management Plan (AQMP), which is prepared by the South Coast Air Quality Management District (SCAQMD). The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and cooperates actively with all state and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures through educational programs or fines, when necessary.

Pollutants and Effects

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards for outdoor concentrations. The federal and state standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include carbon monoxide (CO), ozone (O₃), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter 2.5 microns or less in diameter (PM_{2.5}), particulate matter ten microns or less in diameter (PM₁₀), and lead (Pb). These pollutants are discussed below.

- Carbon Monoxide (CO) is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. It is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, automobile exhaust accounts for the majority of emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient concentrations generally follow the spatial and temporal distributions of vehicular traffic. Concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February.⁶ The

⁶ *Inversion is an atmospheric condition in which a layer of warm air traps cooler air near the surface of the earth, preventing the normal rising of surface air.*

highest concentrations occur during the colder months of the year when inversion conditions are more frequent. CO is a health concern because it competes with oxygen, often replacing it in the blood and reducing the blood's ability to transport oxygen to vital organs. Excess CO exposure can lead to dizziness, fatigue, and impair central nervous system functions.

- Ozone (O_3) is a colorless gas that is formed in the atmosphere when reactive organic gases (ROG) and nitrogen oxides (NO_x) react in the presence of ultraviolet sunlight. O_3 is not a primary pollutant; rather, it is a secondary pollutant formed by complex interactions of two pollutants directly emitted into the atmosphere. The primary sources of ROG and NO_x , the components of O_3 , are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O_3 formation. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The greatest source of smog-producing gases is the automobile. Short-term exposure (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.
- Nitrogen Dioxide (NO_2), like O_3 , is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO_2 are collectively referred to as NO_x and are major contributors to O_3 formation. NO_2 also contributes to the formation of PM_{10} . High concentrations of NO_2 can cause breathing difficulties and result in a brownish-red cast to the atmosphere with reduced visibility. There is some indication of a relationship between NO_2 and chronic pulmonary fibrosis. Some increase of bronchitis in children (2-3 years old) has been observed at concentrations below 0.3 ppm.
- Sulfur Dioxide (SO_2) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Main sources of SO_2 are coal and oil used in power plants and industries. Generally, the highest levels of SO_2 are found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. SO_2 is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO_2 can also yellow plant leaves and erode iron and steel.
- Particulate Matter (PM) consists of small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals and can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Fine particulate matter, or $PM_{2.5}$, is roughly 1/28 the diameter of a human hair and results from fuel combustion (e.g. motor vehicles, power generation, industrial facilities), residential fireplaces, and wood stoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as SO_2 , NO_x , and VOC. Inhalable particulate matter, or PM_{10} , is about 1/7 the thickness of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads;

wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. PM_{2.5} and PM₁₀ pose a greater health risk than larger-size particles. When inhaled, they can penetrate the human respiratory system's natural defenses and damage the respiratory tract. PM_{2.5} and PM₁₀ can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates can cause lung damage directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. These substances can transport absorbed gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas PM₁₀ tends to collect in the upper portion of the respiratory system, PM_{2.5} is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

- Lead (Pb) in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturers of batteries, paint, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phase-out of leaded gasoline reduced the overall inventory of airborne lead by nearly 95 percent. With the phase-out of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities have become lead-emission sources of greater concern. Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.
- Toxic Air Contaminants (TAC) are airborne pollutants that may increase a person's risk of developing cancer or other serious health effects. TACs include over 700 chemical compounds that are identified by State and federal agencies based on a review of available scientific evidence. In California, TACs are identified through a two-step process established in 1983 that includes risk identification and risk management.

Regulatory Setting

Federal

United States Environmental Protection Agency (USEPA). The USEPA is responsible for enforcing the Federal Clean Air Act (CAA), the legislation that governs air quality in the United States. USEPA is also responsible for establishing the National Ambient Air Quality Standards (NAAQS). NAAQS are required under the 1977 CAA and subsequent amendments. USEPA regulates emission sources that are

under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside State waters (e.g., beyond the outer continental shelf) and establishes emission standards, including those for vehicles sold in States other than California, where automobiles must meet stricter emission standards set by CARB.

As required by the CAA, NAAQS have been established for seven major air pollutants: CO, NO₂, O₃, PM_{2.5}, PM₁₀, SO₂, and Pb. The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are summarized in Table IV-1. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin as nonattainment for O₃, PM_{2.5}, and PM₁₀ and maintenance for CO and NO₂.

State

California Air Resources Board (CARB). In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for administering the CCAA and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the state to achieve and maintain the CAAQS, which are generally more stringent than the federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

CARB has broad authority to regulate mobile air pollution sources, such as motor vehicles. It is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The state standards are summarized in Table IV-1.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment.

Table IV-1
State And National Ambient Air Quality Standards And Attainment Status For The South Coast Air Basin

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O ₃)	1-hour	0.09 ppm (180 µg/m ³)	Nonattainment	--	--
	8-hour	0.070 ppm (137 µg/m ³)	^a	0.075 ppm (147 µg/m ³)	Nonattainment
Respirable Particulate Matter (PM ₁₀)	24-hour	50 µg/m ³	Nonattainment	150 µg/m ³	Nonattainment
	Annual Arithmetic Mean	20 µg/m ³	Nonattainment	--	--
Fine Particulate Matter (PM _{2.5})	24-hour	--	--	35 µg/m ³	Nonattainment
	Annual Arithmetic Mean	12 µg/m ³	Nonattainment	12 µg/m ³	Nonattainment
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 mg/m ³)	Attainment	9 ppm (10 mg/m ³)	Maintenance
	1-hour	20 ppm (23 mg/m ³)	Attainment	35 ppm (40 mg/m ³)	Maintenance
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	Nonattainment	53 ppb (100 µg/m ³)	Maintenance
	1-hour	0.18 ppm (338 µg/m ³)	Nonattainment	100 ppb (188 µg/m ³)	Maintenance
Sulfur Dioxide (SO ₂)	24-hour	0.04 ppm (105 µg/m ³)	Attainment	--	Attainment
	1-hour	0.25 ppm (655 µg/m ³)	Attainment	75 ppb (196 µg/m ³)	Attainment
Lead (Pb)	30-day average	1.5 µg/m ³	Nonattainment	--	--
	Calendar Quarter	--	--	0.15 µg/m ³	Attainment
^a CARB has not determined 8-hour O ₃ attainment status. Source: CARB, Ambient Air Quality Standards, and attainment status, accessed October 20, 2014 (www.arb.ca.gov/desig/adm/adm.htm)					

Local

South Coast Air Quality Management District (SCAQMD). The 1977 Lewis Air Quality Management Act merged four air pollution control districts to create the SCAQMD to coordinate air quality planning efforts throughout Southern California. The SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards. Programs include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

The SCAQMD monitors air quality over its jurisdiction of 10,743 square miles, including the South Coast Air Basin, which covers an area of 6,745 square miles and is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto mountains to the north and east; and the San Diego County line to the south. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAQMD also regulates the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin.

All areas designated as nonattainment under the CCAA are required to prepare plans showing how they will meet the air quality standards. The SCAQMD prepares the Air Quality Management Plan (AQMP) to address CAA and CCAA requirements by identifying policies and control measures. On December 7, 2012, the SCAQMD adopted its 2012 AQMP, which is now the legally enforceable plan for meeting the 24-hour PM_{2.5} strategy standard by 2014.

The Southern California Association of Governments (SCAG) assists by preparing the transportation portion of the AQMP. This includes the preparation of a Sustainable Communities Strategy (SCS) that responds to planning requirements of SB 375 and demonstrates the region's ability to attain greenhouse gas reduction targets set forth in state law. In its role as the local air quality regulatory agency, the SCAQMD also provides guidance on how environmental analyses should be prepared. This includes recommended thresholds of significance for evaluating air quality impacts.

City of Los Angeles. The City's General Plan includes an Air Quality Element that provides a policy framework that governs air quality planning within the City of Los Angeles. Adopted in November 1992, the Plan includes six goals, 15 objectives, and 30 policies that help define how the City will achieve its clean air goals.

Air Pollution Climatology

The Project site is located within the Los Angeles County non-desert portion of the South Coast Air Basin. The Basin is in an area of high air pollution potential due to its climate and topography. The region lies in the semi-permanent high pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The Basin experiences warm summers,

mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of its perimeter. The mountains and hills within the area contribute to the variation of rainfall, temperature, and winds throughout the region.

The Basin experiences frequent temperature inversions that help to form smog. While temperature typically decreases with height, it actually increases under inversion conditions as altitude increases, thereby preventing air close to the ground from mixing with the air above. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO₂ react under strong sunlight, creating smog. Light daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland toward the mountains.

Air quality problems also occur during the fall and winter, when CO and NO₂ emissions tend to be higher. CO concentrations are generally worse in the morning and late evening (around 10:00 p.m.) when temperatures are cooler. High CO levels during the late evenings result from stagnant atmospheric conditions trapping CO. Since CO emissions are produced almost entirely from automobiles; the highest CO concentrations in the Basin are associated with heavy traffic. NO₂ concentrations are also generally higher during fall and winter days.

Project Consistency with Air Quality Plans

The proposed retail, restaurant and creative office land uses will neither conflict with the SCAQMD's 2012 Air Quality Management Plan (AQMP) nor jeopardize the region's attainment of air quality standards. The regional ozone attainment plan centers on accommodating population growth forecasts by the Southern California Association of Governments (SCAG). Specifically, SCAG's growth forecasts from the 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are largely built off local growth forecasts from local governments like the City of Los Angeles. The RTP/SCS accommodates up to 3,991,700 persons; 1,455,700 households; and 1,817,700 jobs in the City of Los Angeles by 2020.

The Project site is located in the Central City North Community Plan area, the guiding plan for the implementation of land use standards from the General Plan Framework at the local level. This

Community Plan area was projected to accommodate a population of 38,839 and a housing base of 7,481 units by 2010.⁷

The Project would develop 73,291 square feet of retail uses, 48,040 square feet of creative office uses, and 49,575 square feet of restaurant uses. This level and type of development would not directly increase population in the South Coast Air Basin. As such, the Project would not conflict with the population-based growth assumptions in the regional air plan and this impact is therefore considered less than significant.

The City's General Plan Air Quality Element identifies 30 policies that identify specific strategies for advancing the City's clean air goals. As illustrated in Table IV-2, the proposed Project is consistent with the applicable policies in the General Plan. As such, the proposed Project's impact with regard to consistency with the Air Quality Element of the City's General Plan would be considered less than significant.

Table IV-2
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 1.3.1. Minimize particulate emissions from construction sites.	Consistent. The proposed Project would minimize particulate emissions during construction through best practices and/or mitigation measures.
Policy 1.3.2. Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	Consistent. The proposed Project would minimize particulate emissions from unpaved facilities through best practices and/or mitigation measures.
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	Consistent. The proposed Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to bus routes operating by the Los Angeles County Metropolitan Transportation Authority's Line 18, 53, and 62 that operate generally south of the Project site.
Policy 2.1.2. Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	Consistent. Where appropriate, the proposed Project could include tenants that encourage telecommuting in the future.
Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	Consistent. Where appropriate, the proposed Project could include commercial tenants that promote alternative commute options in the future.

⁷ City of Los Angeles, Central City North Community Plan, <http://cityplanning.lacity.org/complan/pdf/ccncptxt.pdf>, December 15, 2000.

Strategy	Project Consistency
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	Consistent. Where appropriate, the proposed Project could include institute parking management practices in the future.
Policy 2.2.3. Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.	Not Applicable. The proposed Project does not include special events that would require traffic management.
Policy 3.2.1. Manage traffic congestion during peak hours.	Consistent. The proposed Project would minimize traffic impacts below significance thresholds.
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	Consistent. The proposed Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Los Angeles County Metropolitan Transportation Authority, and other regional agencies on the coordination of land use, air quality, and transportation policies.
Policy 4.1.2. Ensure that project level review and approval of land use development remains at the local level.	Consistent. The proposed Project would be entitled and environmentally cleared at the local level.
Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.	Not Applicable. This policy calls for City updates to its General Plan.
Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	Consistent. The proposed Project would be infill development that would provide nearby residents with proximate access to jobs, shopping, and other uses.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	Consistent. The proposed Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to bus routes operating by the Los Angeles County Metropolitan Transportation Authority's Line 18, 53, and 62 that operate generally south of the Project site.
Policy 4.2.4. Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	Consistent. The proposed Project's air quality impacts will be analyzed and minimized through the environmental review process.
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	Consistent. The proposed Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to bus routes operating by the Los Angeles County Metropolitan Transportation Authority's Line 18, 53, and 62 that operate generally south of the Project site.
Policy 4.3.1. Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks posed by air pollution sources.	Not Applicable. This policy calls for City updates to its General Plan.
Policy 4.3.2. Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are located to minimize significant health risks to sensitive receptors.	Not Applicable. This policy calls for City updates to its General Plan.
Policy 5.1.1. Make improvements in Harbor and airport	Not Applicable. This policy calls for cleaner

Strategy	Project Consistency
operations and facilities in order to reduce air emissions.	operations of the City's water port and airport facilities.
Policy 5.1.2. Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	Not Applicable. This policy calls for cleaner operations of the City's buildings and operations.
Policy 5.1.3. Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.	Not Applicable. This policy calls for cleaner operations of the City's Water and Power energy plants.
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	Not Applicable. This policy calls for City facilities to reduce solid waste and energy consumption.
Policy 5.2.1. Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	Not Applicable. This policy calls for the City to gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements.
Policy 5.3.1. Support the development and use of equipment powered by electric or low-emitting fuels.	Consistent. The Project would be designed to meet the applicable requirements of the States Green Building Standards Code and the City of Los Angeles' Green Building Code.
Policy 6.1.1. Raise awareness through public-information and education programs of the actions that individuals can take to reduce air emissions.	Not Applicable. This policy calls for the City to promote clean air awareness through its public awareness programs.
<i>Source: DKA Planning, 2015.</i>	

The air quality impacts of the proposed retail development on the Project site are accommodated in the region's missions inventory for the RTP/SCS and AQMP. The project is therefore not expected to conflict with or obstruct implementation of the AQMP, and any impact on the plan would be considered less than significant.

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Potentially Significant Unless Mitigation Incorporated. Based on the *L.A. CEQA Thresholds Guide*, a project may have a significant impact where project-related emissions would exceed federal, state, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. The City of Los Angeles defers to the SCAQMD's thresholds of significance for determining project impacts upon air quality.

Construction Emissions

Construction-related Project emissions were estimated using the SCAQMD's CalEEMod 2013.2.2 model using assumptions from the Project Applicant, including the Project's construction schedule of 18 months and the potential number and mix of off-road construction equipment by construction phase. Key assumptions include the following duration for each of the key phases of construction: demolition/site

clearing (one month), grading (three months), building construction (18 months), and architectural coatings (two months concurrent with construction). The analysis also assumes up to 3.55 acres would be disturbed during the grading phase each day for modeling purposes. However, there is expected to be an equal amount of cut earthwork and fill earthwork, followed by a recompaction of what is excavated on the site, resulting in a total balance of earth materials on-site. Detailed modeling results are provided in Appendix B to this IS/MND.

The construction process would also include soil remediation from previous industrial uses. These processes would be regulated by numerous agencies, including the California Department of Toxic Substances Control and SCAQMD Rule 1166, which governs the control of VOC from treating VOC-contaminated soils. Equipment would be used to excavate the site and up to 47 trucks would dispose of soils at off-site licensed treatment and disposal facilities, removing sources of exposure risks from the Project site.⁸ These processes would be performed prior to the mass and fine grading of the Project site.

As shown in Table IV-3, construction of the proposed Project would produce NO_x, CO, SO_x, PM₁₀ and PM_{2.5} emissions that do not exceed the SCAQMD's regional thresholds. However, VOC emissions during the application of architectural coatings could exceed the recommended threshold of 75 pounds per day. These daily exceedances could further be exacerbated during concurrent building construction activities, which would emit up to another four pounds per day of VOC. As a result, construction of the proposed Project could contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). This impact is considered significant but capable of being mitigated.

Table IV-3
Estimated Daily Project Construction Emissions - Unmitigated

Construction Phase	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Demolition						
On-Site Emissions	5	48	36	<1	9	3
Off-Site Emissions	1	9	7	<1	1	<1
Total Emissions	5	58	44	<1	10	4
Grading						
On-Site Emissions	4	40	27	<1	8	5
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	4	40	28	<1	9	5
Building Construction						

⁸ Kleinfelder, "Draft Remedial Action Work Plan", July 16, 2015.

Table IV-3
Estimated Daily Project Construction Emissions - Unmitigated

On-Site Emissions	4	30	19	<1	2	2
Off-Site Emissions	<1	3	7	<1	1	<1
Total Emissions	4	33	26	<1	3	2
Architectural Coatings						
On-Site Emissions	88	2	2	<1	<1	<1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	88	2	3	<1	<1	<1
Maximum Regional Total	88	58	44	<1	10	5
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	Yes	No	No	No	No	No
Maximum Localized Total						
Localized Significance Threshold	--	161	1,861	--	16	8
Exceed Threshold?	No	No	No	No	No	No
Source: DKA Planning, 2015 based on CalEEMod 2013.2.2 model runs. LST analyses based on 5 acre site with 25 meter distances to receptors in Central Los Angeles source receptor area.						

In terms of local air quality, the proposed Project would not produce significant emissions that exceed the SCAQMD's recommended localized standards of significance for NO_x and CO. In addition, grading activities would not produce substantial emissions of fugitive particulates that exceed the SCAQMD's thresholds for PM₁₀, and PM_{2.5}. As a result, construction impacts on localized air quality are considered less than significant. Nevertheless, Mitigation Measure 3-1 is recommended to minimize localized emissions of particulates from fugitive dust sources. These are generally required by SCAQMD Rule 403, which calls for the application of best available control measures to all construction activities. Mitigation Measure 3-2 is required to reduce any daily exceedances of the SCAQMD's recommended threshold of 75 pounds per day of VOC emissions.

Mitigation Measures:

3-1 Air Quality (Construction)

- During grading activities, the unpaved portions of the site shall be watered at least three times daily to reduce PM₁₀ and PM_{2.5} emissions.
- Ground cover shall be replaced and/or installed as soon as practical to reduce fugitive PM₁₀ and PM_{2.5} emissions.
- Wheel washers and/or rumble grates shall be used at the entrance/exit(s) to the construction site to minimize track-out of soils.

3-2 Air Quality (Construction)

- The application of architectural coatings shall be performed over a period of at least ten weeks to ensure daily VOC emissions do not exceed SCAQMD's recommended threshold of significance of 75 pounds per day.

Implementation of Mitigation Measure 3-1 would reduce on-site emissions of fugitive PM₁₀, and PM_{2.5} during grading and other phases where earthmoving occurs. Mitigation Measure 3-2 would ensure that daily VOC emissions do not substantially contribute to a potential ozone violation. Table IV-4 summarizes the resulting emissions of fugitive particulates during Project construction with implementation of Mitigation Measures 3-1 and 3-2. With implementation of Mitigation Measure 3-2, the Project's impact with respect to daily VOC emissions would be reduced to a less than significant level.

Table IV-4
Estimated Daily Project Construction Emissions - Mitigated

Construction Phase	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Demolition						
On-Site Emissions	5	48	36	<1	5	3
Off-Site Emissions	<1	9	7	<1	1	<1
Total Emissions	5	58	44	<1	5	3
Grading						
On-Site Emissions	4	40	27	<1	5	3
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	4	40	28	<1	5	3
Building Construction						
On-Site Emissions	4	30	19	<1	2	2
Off-Site Emissions	<1	3	7	<1	1	<1
Total Emissions	4	33	26	<1	3	2
Architectural Coatings						
On-Site Emissions	71	2	2	<1	<1	<1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	71	2	3	<1	<1	<1
Maximum Regional Total	71	58	44	<1	5	3
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total						
Localized Significance Threshold	--	161	1,861	--	16	8
Exceed Threshold?	No	No	No	No	No	No
Source: DKA Planning, 2015 based on CalEEMod 2013.2.2 model runs. LST analyses based on 5 acre site with 25 meter distances to receptors in Central Los Angeles source receptor area.						

Operational Emissions

The existing site includes 148,000 square feet of light industrial space that generates on-site and off-site air pollution emissions. On-site emissions are generated by area sources (e.g., architectural coatings) and energy use (e.g., electricity and natural gas use). The bulk of emissions from the existing development come from mobile sources that generate off-site emissions from the 1,030 average daily weekday trips to and from this building.⁹ The existing emissions from the Project site are shown in Table IV-5 below.

The Project would also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project site. The Project could add up to 4,215 net vehicle trips to and from the Project site on a peak weekday at the start of operations in 2016, with up to 455 more vehicles entering and exiting the Project site in the peak afternoon hour and 105 in the peak morning hour.¹⁰ However, net operational emissions from the Project would not exceed SCAQMD's regional significance thresholds for VOC, NO_x, CO, PM₁₀ and PM_{2.5}, as shown in Table IV-5. As a result, the Project's operational impacts on regional air quality are considered less than significant and no mitigation is required.

Table IV-5
Estimated Daily Project Operational Emissions

Emission Source	Pounds per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	4	<1	<1	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	19	43	185	<1	26	7
Total Operations	24	43	186	<1	26	7
Less Existing Operations	-8	-16	-61	<1	-3	-3
Net Operations	16	27	125	<1	23	4
SCAQMD Threshold	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Source: DKA Planning 2015 based on CalEEMod 2013.2.2 model runs.						

- c) **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**

⁹ R.A. Smith National, Inc., Traffic Impact Analysis Report, At Mateo Retail Development; February 2015.

¹⁰ Ibid.

state ambient air quality standard (including releasing emissions, which exceed quantitative threshold for ozone precursors)?

Potentially Significant Unless Mitigation Incorporated. Based on the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project adds a considerable cumulative contribution to federal or state non-attainment pollutants. As the Basin is currently in state non-attainment for ozone, NO₂, PM₁₀ and PM_{2.5}, cumulative development projects in the vicinity could exceed an air quality standard or contribute to an existing or projected air quality exceedance. In regards to determining the significance of the Proposed Project's contribution, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

Construction Emissions

As discussed under Question 3(b) above, construction of the proposed Project would not contribute significantly to cumulative emissions of pollutants for any non-attainment pollutants. For regional ozone precursors, the Project would not exceed SCAQMD mass emission thresholds for NO_x during construction or operations. However, VOC emissions could produce significant emissions during the application of architectural coatings during Project construction and could contribute substantially to an ozone violation. As such, the Project's impact on cumulative ozone precursor emissions would be considered significant prior to mitigation. Table IV-4 summarizes the net construction emissions from the Project following implementation of Mitigation Measures 3-1 and 3-2, which would reduce Project VOC emissions to a less than significant level.

When evaluating local impacts, cumulative construction emissions are considered when development projects are within close proximity of each other. Of the 19 cumulative development projects within one mile of the Project site (listed in Table II-3), 15 are located more than 0.25 mile distant and would not contribute to cumulative construction-related air quality impacts at receptors near the Project site. Four potential construction projects are located within approximately 0.25 mile of the Project site and therefore could produce cumulatively considerable construction emissions:

- Cumulative Project No. 4 (950 East 3rd Street) – A mixed-use development at SCI-Arc, including 635 apartment units, 30,062 square feet of retail, and a 532-student school approximately 1,775 feet north of the Project site.

- Cumulative Project No. 7 (963 East 4th Street): A mixed-use development with 78,600 square feet of office and 45,000 square feet of retail/restaurant uses approximately 870 feet northwest of the Project site.
- Cumulative Project No. 10 (1147 Palmetto Street) – A mixed-use development including 234 apartment units and a 14,018 square foot restaurant approximately 945 feet west of the Project site.
- Cumulative Project No. 11 (520 South Mateo Street): A mixed-use development with 350 dwelling units and 28,000 square feet of retail approximately 50 feet northeast of the Project site.

Even if these projects were to undertake construction concurrently with the proposed Project, localized PM_{2.5}, PM₁₀, and NO₂ concentrations would not exceed ambient air quality standards at nearby receptors. The application of LST thresholds to these cumulative projects would help ensure that each project does not produce localized hotspots of PM_{2.5}, PM₁₀, and NO₂. Any project that would exceed LST thresholds would perform dispersion modeling to mitigate any significant localized emissions. Receptors that are located further away would not be threatened with exceedances of health-based standards, and emissions significantly disperse as a function of atmospheric stability, mixing heights, and other variables, with distance a critical factor. The SCAQMD's LST thresholds recognize the influence of a receptor's proximity, setting LST mass emissions thresholds for PM₁₀ that generally double with every doubling of distance. As a result, concurrent construction of the proposed Project and these cumulative projects would not produce cumulatively considerable emissions of localized nonattainment pollutants, as the anticipated emissions would not exceed LST thresholds set by the SCAQMD. Because the proposed Project's emissions of PM₁₀ and PM_{2.5} would not exceed these thresholds, this is considered a less than significant impact.

Mitigation Measure 3-1 would substantially reduce Project fugitive dust emissions during all phases that involve earthmoving, particularly grading, and would minimize any potential air quality impacts on these nearby receptors. Each of the four proposed cumulative projects at these nearby locations would also presumably apply similar mitigation measures should its construction emissions of particulates exceed the SCAQMD's LST thresholds. Therefore, with implementation of Mitigation Measures 3-1 and 3-2, concurrent construction of the proposed Project and the cumulative construction projects would not result in a significant cumulative impact on pollutant concentrations at nearby receptors.

Operational Emissions

With respect to cumulative operational impacts, the proposed land uses will not produce cumulatively considerable emissions of nonattainment pollutants at the regional or local level. Because the Project's operational air quality impacts would not exceed the SCAQMD's operational thresholds of significance as noted in Table IV-5, the Project's impacts on cumulative emissions of non-attainment pollutants is considered less than significant. The Project is a retail/restaurant/office project that does not include major sources of combustion or fugitive dust. As a result, its localized emissions of NO₂, PM₁₀, PM_{2.5} or lead would be minimal. Similarly, existing land uses in the area include residential, retail, and commercial office uses that do not produce substantial emissions of localized nonattainment pollutants.

d) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities; rehabilitation centers; convalescent centers; retirement homes; residences; schools; playgrounds; child care centers; and athletic facilities.¹¹

The SCAQMD has developed localized significance thresholds (LSTs) that are based on the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the “Final Localized Significance Threshold Methodology” document prepared by the SCAQMD,¹² apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO_x; CO; PM₁₀; and PM_{2.5}. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area (SRA). For PM₁₀, the LSTs were derived based on requirements in SCAQMD Rule 403 — Fugitive Dust. For PM_{2.5}, the LSTs were derived based on a general ratio of PM_{2.5} to PM₁₀ for both fugitive dust and combustion emissions.

LSTs are provided for each of SCAQMD’s 38 SRAs at various distances from the source of emissions. The Project Site is located within SRA 1, which covers the Central Los Angeles area. The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Proposed Project include the following:

- Molino residential lofts, 530 Mateo Street. This two- to three-story residential building is located 50 feet directly northwest of the Project site.
- Barker Block residential lofts, 510 North Hewitt Street. This includes numerous lofts in the historic 1925 Barker Bros. building, located 50 feet north of the Project site.
- Cumulative Project No. 11 (520 South Mateo Street). This proposed mixed-use development would include residences, but would not be operational by the projected 2016 completion of construction of the Proposed Project. Therefore, it is not considered a sensitive receptor for this analysis.

¹¹ South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993, page 5-1.

¹² South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, June 2003, Revised July 2008.

Localized Construction Emissions

As shown in Table IV-3, these nearby receptors would not be exposed to substantial concentrations of localized pollutants PM_{2.5} and PM₁₀ from construction of the proposed Project. Specifically, construction activities during grading and site preparation would not exceed SCAQMD LST thresholds for PM_{2.5} and PM₁₀ and would therefore represent a less than significant impact. LST thresholds represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable ambient air quality standard.

As a result, construction of the Project would not contribute to any localized violations of the CO, NO_x, PM_{2.5}, or PM₁₀ standards at any local sensitive receptors. Implementation of Mitigation Measure 3-1 is recommended to reduce fugitive and exhaust particulate emissions during grading and other construction phases that involve earthmoving and will minimize any potential air quality impacts on these nearby receptors. These steps are generally required by SCAQMD Rule 403, which calls for the application of best available control measures to all construction activities.

The construction process would also include soil remediation that would be regulated by numerous agencies, including the California Department of Toxic Substances Control and SCAQMD Rule 1166, which governs the control of VOC from treating VOC-contaminated soils. Equipment would be used to excavate the site, at which point soils would be disposed of at off-site licensed treatment and disposal facilities, removing sources of exposure risks from the Project site.

Localized Operational Emissions

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO), referred to as CO “hotspots”. The proposed Project would generate long-term emissions that would generate negligible pollutant concentrations of CO, NO₂, PM_{2.5}, or PM₁₀ at sensitive receptors and would be considered to have a less than significant impact. Long-term operations of the Project would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to the Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot.

Screening analysis guidelines for localized CO hotspot analyses from Caltrans recommend that projects in CO attainment areas focus on emissions from traffic intersections where air quality may get worse.¹³

¹³ Caltrans, *Transportation Project-Level Carbon Monoxide Protocol*, updated October 13, 2010.

Specifically, projects that significantly increase the percentage of vehicles operating in cold start mode, significantly increase traffic volumes, or worsen traffic flow should be considered for more rigorous CO modeling. Traffic levels of service at the ten intersections studied in the vicinity of the Project site would not be significantly impacted by traffic volumes from the development under either existing or 2016 Project completion scenarios.¹⁴ In addition, the Project would not significantly increase the percentage of vehicles operating in cold start mode or substantially worsen traffic flow.

Finally, toxic air contaminant (TAC) emissions are not expected to be significant, as the proposed Project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.¹⁵ The proposed Project is not anticipated to generate a substantial number of truck trips. Based on the limited activity of TAC sources, the Project would not warrant the need for a health risk assessment associated with on-site activities, and any minimal TAC impacts are expected to be less than significant.

In light of the above, long-term operation of the proposed Project would result in a less than significant impact on pollutant concentrations at nearby sensitive receptors and no mitigation is required.

e) Would the project create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. A significant impact may occur if objectionable odors occur that would adversely impact sensitive receptors. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. As the Proposed Project involves no elements related to these types of activities, no odors from these types of uses are anticipated. Good housekeeping practices would be sufficient to prevent nuisance odors associated with the proposed restaurant uses. In addition, SCAQMD Rule 402 (Nuisance) and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Project's long-term operations phase. Therefore, potential operational odor impacts would be less than significant.

During the construction phase, activities associated with the application of architectural coatings and other interior and exterior finishes may produce discernible odors typical of most construction sites. Such odors could be a temporary source of nuisance to adjacent uses. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD Rules, no construction activities or

¹⁴ R.A. Smith National, Inc., *Traffic Impact Analysis Report, At Mateo Retail Development*; February 2015.

¹⁵ SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions*, December 2002.

materials that would create a significant level of objectionable odors are proposed. Therefore, impacts associated with objectionable odors would be less than significant.

Cumulative Impacts: Air Quality

Less than Significant Impact. Development of the Project, in conjunction with the cumulative development in the vicinity that has been identified by the City, would result in an increase in construction and operational emissions in an already highly urbanized area of the City of Los Angeles.

AQMP Consistency

Cumulative development can affect implementation of the 2012 AQMP. The 2012 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the 2012 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2012 AQMP will not be obstructed by such growth and cumulative impacts would be less than significant. Since the Proposed Project is consistent with SCAG's growth projections, it would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the 2012 AQMP would be less than significant.

Construction and Operational Emissions

Cumulative air quality impacts from construction and operation of the proposed and cumulative projects would be based on SCAQMD guidelines, and are analyzed in a manner similar to Project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Thus, as discussed in Question 3(c) above, because the mitigated construction-related and operational daily emissions associated with the proposed Project would not exceed the SCAQMD's recommended thresholds, these associated emissions would not be cumulatively considerable. Therefore, cumulative air quality impacts would be less than significant.

Odor Impacts

With respect to cumulative odor impacts, potential sources that may emit odors during construction activities at the proposed Project and each cumulative development project include the use of architectural

coatings, solvents, and asphalt paving. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Furthermore, based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the proposed and cumulative projects would not combine to create objectionable construction odors. With respect to operations, SCAQMD Rule 402 (Nuisance) and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts from the projects' long-term operations phases. Thus, cumulative odor impacts would be less than significant.

4. BIOLOGICAL RESOURCES

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 regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise or light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The Project site does not contain any critical habitat or support any species identified or designated 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. The Project site is located in an urbanized area of the City and is improved with warehouse buildings and parking lots. A total of six trees are located along the sidewalk adjacent to the site's Mateo Street frontage. No trees are located within the site. Therefore, implementation of the Project would not result in any adverse impacts with respect to habitat modification, and no impact would occur.

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, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or

plant community; (c) the alternation of an existing wetland habitat; or (d) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise or light) to a degree that may diminish the chances for long-term survival of a sensitive species. The Project site is occupied by industrial warehouse buildings and parking areas. No riparian or other sensitive natural communities are located on or adjacent to the Project site. Therefore, implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities and no impact would occur.

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat, as defined by Section 404 of the Clean Water Act. The Project site is developed with warehouse buildings and parking areas, does not contain any wetlands or natural drainage channels, and is located in an urbanized area of the Central City North Community Plan Area of the City of Los Angeles. Therefore, the Project site does not have the potential to support any riparian or wetland habitat. No federally protected wetlands (e.g., emergent, forested/shrub, estuarine and marine deep water, estuarine and marine, freshwater pond, lake, riverine) occur on or in the vicinity of the Project site.¹⁶

Therefore, the Project would not result in the direct removal, filling, or hydrological interruption of a federally protected wetland as defined by Section 404 of the Clean Water Act, and no impact to federally protected wetlands would occur as a result of the Project.

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?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in the interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. The Project is located in an area that has been previously developed in a heavily urbanized area of the City of Los Angeles. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the Project vicinity. Therefore, the Project would not interfere with the movement of any resident or migratory fish or wildlife species.

¹⁶ U.S. Fish and Wildlife Service, *National Wetlands Inventory*, Wetlands layer: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed January 2015.

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)?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance, 177,404. The Project Site is located in an urbanized area of the City. The Project site is completely paved and developed and no significant vegetation exists on-site. No protected biological resources or tree species, such as oak or sycamore trees, currently exist on the Project site. Therefore, the Project would not conflict with any tree preservation policy or ordinance, and no impacts would occur.

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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if a project would be inconsistent with mapping or policies in any conservation plans of the types cited. No locally designated natural communities are known to occur on or adjacent to the Project site. Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, and no impact would occur.

Cumulative Impacts: Biological Resources

No Impact. Development of the Project in conjunction with the cumulative development projects would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. There are no known protected biological resources or habitats in the area. Moreover, development of the cumulative projects is expected to occur in accordance with adopted plans and regulations. With respect to biological resources, each of the cumulative projects would be subject to site plan review and/or other planning approvals by the Director of Planning or other City decision-makers for review and approval. Thus, the Project would not contribute to any cumulative impact on biological resources.

5. CULTURAL RESOURCES

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in *State CEQA Guidelines* §15064.5?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project would disturb historic resources that presently exist within the project site. A project would normally have a significant impact on historical resources if it would result

in a substantial adverse change in the significance of a historical resource. A substantial adverse change in significance would occur if a project would: (1) demolish a significant resource; (2) relocate a significant resource in a manner that does not maintain its integrity and significance; (3) convert, rehabilitate, or alter a significant resource in a manner that does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or (4) result in construction that reduces the integrity or significance of important resources on the site or in the vicinity.

State CEQA Guidelines Section 15064.5 defines a historical resource as: (1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting certain state guidelines; or (3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A Historic Resource Assessment Report was prepared for the Project site by Urbana Preservation & Planning, LLC in November 2014 and is included as Appendix C to this IS/MND. The content of this report is summarized below.

Regulatory Framework

Significant historical resources include those designated or eligible for designation in the National Register of Historic Places (National Register); the California Register of Historical Resources (California Register) or other state Program; as a City of Los Angeles Historic Cultural Monument (HCM); or in a City of Los Angeles Historic Preservation Overlay Zone (HPOZ). Historical resources may also include resources listed in the State Historic Resources Inventory as significant at the local level or higher and those evaluated as potentially significant in a survey or other professional evaluation. Projects that affect historical resources, such as by demolition, relocation, rehabilitation, conversion, alteration, or construction, may have a significant impact.

National Historic Preservation Act

The National Historic Preservation Act (NHPA) requires federal agencies to consider the effects of proposed federal actions on historic properties. A historic property is defined as any building, site, district, structure, or object that is either listed on or eligible for the National Register of Historic Places. In order for a property to qualify for the National Register of Historic Places, it must meet one of the four National Register Criteria for Evaluation listed below by being associated with an important historic context and retaining historic integrity of those features necessary to convey its significance. Pursuant to *National Register Bulletin 15*, the quality of significance in American history, architecture, archaeology, engineering, and culture is present in sites, districts, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represents a significant and distinguishable entity whose components lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.

Two possible scenarios exist relative to the effects a potential action may have on a historic property: (1) no historic properties are affected, or (2) historic properties are affected. An adverse effect is found when an action may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. A finding of no adverse effect may be issued if the proposed action's effects do not meet the above-listed examples, or if the action is modified or conditions are imposed in order to avoid adverse effects.

California Environmental Quality Act

CEQA provides that any project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant impact on the environment. Public Resources Code Section 5020.1(q) defines "substantial adverse change" as demolition, destruction, relocation, or alteration such that the significance of the historical resource would be impaired. A historical resource is a resource that is listed in, or is determined to be eligible for listing in, the California Register of Historical Resources; included in a local register of historical resources; or is identified as significant in a historic resources survey if that survey meets the criteria specified in Public Resources Code Section 5024.1(g).

A property may be eligible for listing in the California Register of Historical Resources if it is determined to meet one of the following criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

City of Los Angeles Historic-Cultural Monument Eligibility Criteria

Any site (including significant trees or other plant life located on the site), building, or structure of particular historic or cultural significance may be designated as a Historic-Cultural Monument by the City of Los Angeles Cultural Heritage Commission if it meets at least one of the following criteria:

1. Historic structures or sites in which the broad cultural, economic, or social history of the nation, State, or community is reflected or exemplified; or
2. Is identified with historic personages or with important events in the main currents of national, State, or local history; or
3. Embodies the distinguishing characteristics of an architectural type, specimen, inherently valuable for the study of a period, style, or method of construction; or
4. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman; or
5. Is a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.

Historical Overview of Project Site

The Project site is located in the oldest section of Los Angeles, on lands that were part of the original Spanish pueblo. The area surrounding the site was depicted on Ord's 1857 Map of the City of Los Angeles, which illustrates nearly the entirety of the city as it existed at the time. The Project site is shown on the map on the southwestern outskirts of the pueblo lands, between Main Street and the Los Angeles River. The parcel was part of the lands of the City of Los Angeles and was in an unsectioned area being used for agricultural purposes. Part of the property was later subdivided as part of the Guasti Tract, recorded by Segundo Guasti in 1936. In 1886, the site supported a vineyard rented by Guasti, who later moved his winemaking operation to the site.

By 1890, the Los Angeles business district had moved south, away from the plaza around which the Spanish town was founded. The area around Mateo and Palmetto Streets was originally set out in crops: corn and grapes. As early as 1886, the property was supporting a thriving vineyard. The vicinity changed dramatically after 1893 when the Atchison, Topeka, and Santa Fe Railroad opened its La Grande Station north of the Project site (at Santa Fe Avenue and 2nd Street). Subsequent to the opening of the station, various industrial enterprises located to the area, taking advantage of the convenient access to rail. During the late 19th and early 20th centuries, the surrounding district became a thriving commercial and industrial hub.

The Guasti Winery maintained its production at the site and, in 1897, added the Glendale Winery to its holdings. In 1900, Guasti incorporated the organization as the Italian Vineyard Company, with the Palmetto Street site as its headquarters. The same year, the company purchased 4,000 acres in San Bernardino County, to which it would eventually relocate. The Palmetto Street site continued to serve as

the headquarters of the company until approximately 1940, when it relocated to the Transamerica Building on Olive Street.

At the same time the Italian Vineyard Company was developing its holdings at the site, the Union Oil Tool Company (later the Union Tool Company) began to also develop a portion of the site. The firm had its beginnings in Santa Paula in Ventura County as the Union Oil Company. In 1900, Edward Double started the Union Oil Tool Company to manufacture oil well components. The company rapidly outgrew the Santa Paula location and, in 1901, moved to the Project site. The lot along Mateo Street between Palmetto and 6th Streets was first owned by the Union Oil Company as early as 1896, where at least one steel oil tank was located (the tank was not located on the Project site, but was located on the adjacent property along 6th Street). The company acquired additional property at the site in 1897, when the land at the corner of Mateo and Palmetto Streets was purchased from Caroline H. Shafer. The oil storage tank was fed by a pipeline running along the Southern Pacific Railroad tracks approximately four miles from the Los Angeles Oil Field in the vicinity of 1st and Lakeshore Streets. The first building erected on the Project site was for the Union Oil Tool Company in 1901 and consisted of a two-and-one-half story frame machine shop. That same year, a second oil tank was added.

The second building on the Project site was erected in 1903 for the American Engineering and Foundry Company. The company, which produced iron products and machinery, was located in a two-story wood-framed and iron-corrugated plant. In 1907, this building and its contents were completely destroyed by fire. In 1908, the Union Oil Tool Company and the American Engineering and Foundry Company merged to form the Union Tool Company. In 1908, the new company built a one-story steel frame warehouse at 550-54 Mateo Street. A short time later, a one-story machine shop was constructed at 1316 Palmetto Street. In 1910, the company purchased three lots fronting on Palmetto Street. By 1911, over 150,000 square feet of floor space was owned by the company at the Mateo and Palmetto Streets property. However, this was not enough space for the growing company, which soon afterward purchased 35 acres in Torrance and would subsequently relocate.

After the Union Tool Company vacated the property, the Union Oil Company continued to use the location. In 1916, the company sought bids to pave a portion of the site. Limited information regarding the Union Oil Company usage of and tenure at the Project site has been found. Vintage aerial photographs show little apparent change at the site between 1948 and the 1960s. During this time, the property held a collection of several small buildings including a yard house, a red shop, a pipe fitting shop, two oil pump houses, and three larger warehouses, all single-story. The property also held at least 13 oil storage tanks of various sizes, the two largest of which were located along 6th Street and not on the current Project site. The Union Oil Company also ran a gas station at the corner of Mateo and 6th Streets (not on the Project site).

By 1964, aerial photographs show that all of the oil storage tanks had been removed from the property, as had most of the warehouses. One long, narrow single-story warehouse remained along Mateo Street south of Palmetto Street. This structure was eventually razed and removed between 1994 and 2003. As

of 1964, two new buildings had been erected on the northern end of the site. Over the years, these two buildings were altered and connected and now share the address of 1260 Palmetto Street (Buildings 3 and 4 in the Historic Resources Assessment; see Appendix C). The remaining existing warehouse buildings on the Project site were constructed in 1970 and currently exist at 561 and 581-585 Mateo Street (Buildings 1 and 2 in the Historic Resources Assessment, see Appendix C). Few alterations to these buildings have occurred since 1970. The locations of the buildings on the site are shown in Figure IV-1.

Architectural Description of Existing Structures

581-585 Mateo Street (Building 1)

The building at 581-585 Mateo Street is a large warehouse building, approximately 230 by 170 feet, containing approximately 40,000 square feet and constructed in 1970. The building is rectangular in plan with the longer side fronting Mateo Street. The walls are composed of reinforced concrete. Engineered glued laminated wood timbers supported on tubular steel columns support the roof. The roof is flat and concealed by a low parapet wall. The primary façade faces Mateo Street and is comprised of a simple wall plane with openings punched through at various locations. Two full-height metal rollup doors allow for access to 585 Mateo. There is a two-story section of the building that houses a carport tucked under the second floor offices. Four long rectangular aluminum framed windows allow for light and air on the second floor. 581 Mateo Street is located within the same building at the eastern end. This address also sports two full height metal rollup doors as well as a smaller pedestrian doorway, which is protected by a metal security screen. The eastern and northern elevations abut the neighboring buildings and cannot be seen from the exterior. Current photographs of Building 1 are shown in Figure IV-2.

561 Mateo Street (Building 2)

The building at 561 Mateo Street was also constructed in 1970 and is a large reinforced concrete warehouse building with an unadorned façade and no windows. The building is rectangular in plan, approximately 190 by 340 feet, and contains approximately 65,000 square feet. The short end of the building fronts on Mateo Street. Along the Mateo Street frontage, the building has a single full-height metal roll-up door and one pedestrian doorway. The long side of the building, which is visible from Palmetto Street, has three full-height metal roll-up doors. The building roof is flat and is concealed by a low parapet wall. In the interior of the building, engineered glued laminated wood timbers supported on tubular steel columns support the roof. The southern side of the building abuts the neighboring structure and cannot be seen from the exterior. Current photographs of Building 2 are shown in Figure IV-3.

1260 and 1262 Palmetto Street (Buildings 3 and 4)

The warehouse buildings at 1260 and 1262 Palmetto Street were also built in 1970. Building 3 is a single-story building with an automobile ramp to the roof on its eastern edge, leading to a rooftop parking facility. The building is roughly rectangular in plan, approximately 140 by 150 feet, and contains

approximately 22,000 square feet. The longer end of Building 3 fronts on Palmetto Street. Part of Building 3 incorporates an older building, dating from prior to 1964. This older structure has a gabled roof, while the newer portion has a flat roof that is concealed by a low parapet wall. On the interior, tubular steel trusses resting on steel columns support the roof. The walls of the building consist of unadorned reinforced concrete with a smooth finish. The building has no windows; the only openings are a full-height metal roll-up door and pedestrian door on the Mateo Street end and four full-height metal roll-up doors along the Palmetto Street frontage.

Building 4 is an open-sided shed, approximately 110 by 80 feet, containing approximately 8,800 square feet with the longer side fronting Palmetto Street. Central steel columns supporting steel girders and a corrugated flat metal roof hold up the structure. The building has no walls, windows, or doors and is effectively a canopy to shield items from the elements. Current photographs of Buildings 3 and 4 are shown on Figures IV-4 and IV-5, respectively.

Historical Resource Eligibility of Existing Structures

581-585 Mateo Street (Building 1)

Contextual and site specific historical research was conducted to obtain the names of past owners and occupants of 581-585 Mateo Street and to identify potential themes under which the subject property could be found eligible for inclusion on the National Register, California Register, and/or as a City Historic-Cultural Monument. Research disclosed that the property is located within one of the oldest developed areas of Los Angeles. Buildings were found to be located on the site as early as 1901; however they were razed for construction of the existing Building 1 in 1970.

Historical research did not reveal any significant events associated with Building 1. The property does not appear to be eligible for listing under National Register/California Register Criterion A/1 or City of Los Angeles Historic-Cultural Monuments eligibility criterion 1. Similarly, the subject property was not found to be associated with persons important in local, state, regional, or national history. Building 1 does not appear significant under National Register/California Register Criterion B/2 or City of Los Angeles Historic-Cultural Monuments eligibility criterion 2.



Source: Urban a Preservation & Planning, LLC., 2014.



View of the 581-585 Mateo Street property, front elevation, along Mateo Street.



View of the 581-585 Mateo Street property, front elevation, along Mateo Street.

Source: Urban a Preservation & Planning, LLC., 2014.



View of the 561 Mateo Street property, front (east) elevation (at left) and north elevation (at right) visible from Mateo Street.



View of the 561 Mateo Street property, front elevation, visible from Mateo Street.

Source: Urban a Preservation & Planning, LLC., 2014.



View of the 1262 Palmetto Street property, front elevation, visible from Palmetto Street.



View of the 1262 Palmetto Street property, front elevation, visible from Palmetto Street with associated auto ramp leading to the roof level parking.



View of the 1262 Palmetto Street property, roof level parking.

Source: Urban a Preservation & Planning, LLC., 2014.



View of the 1260 Palmetto Street property (with flat roof and posts visible) from the intersection of Palmetto Street and Mateo Street.



View of the 1260 Palmetto Street property from roof of the adjacent 1262 Palmetto Street property.

Source: Urban a Preservation & Planning, LLC., 2014.

Building 1 was not found to be a significant example of industrial architecture. While the building has not been subject to significant alterations through the decades that could have compromised its integrity, it is not a significant example of reinforced concrete industrial building construction. Rather, it is a banal example of a ubiquitous building type. Building 1 does not embody the distinctive characteristics of a specific style, type, period, or method of construction, and a master architect did not design it. Building 1 does not appear significant under National Register/California Register Criterion C/3 or City of Los Angeles Historic-Cultural Monuments eligibility criteria 3, 4, or 5.

The subject property has not yielded, nor is it likely to yield, information important in prehistory or history and, therefore, does not appear significant under National Register/California Register Criterion D/4. Thus, Building 1 does not appear to be eligible for inclusion in the National Register or the California Register, nor does it appear to be eligible for recognition as a City of Los Angeles Historic-Cultural Monument.

561 Mateo Street (Building 2)

Contextual and site specific historical research was conducted to obtain the names of past owners and occupants of 561 Mateo Street and to identify potential themes under which the subject property could be found eligible for inclusion on the National Register, California Register, and/or as a City Historic-Cultural Monument. Research disclosed that the property is located within one of the oldest developed areas of Los Angeles. Buildings were found to be located on the site as early as 1901; however they were razed for construction of the existing Building 1 in 1970.

Historical research did not reveal any significant events associated with Building 2. The property does not appear to be eligible for listing under National Register/California Register Criterion A/1 or City of Los Angeles Historic-Cultural Monuments eligibility criterion 1. Similarly, the subject property was not found to be associated with persons important in local, state, regional, or national history. Building 2 does not appear significant under National Register/California Register Criterion B/2 or City of Los Angeles Historic-Cultural Monuments eligibility criterion 2.

Building 2 was not found to be a significant example of industrial architecture. While the building has not been subject to significant alterations through the decades that could have compromised its integrity, it is not a significant example of reinforced concrete industrial building construction. Rather, it is a banal example of a ubiquitous building type. Building 2 does not embody the distinctive characteristics of a specific style, type, period, or method of construction, and a master architect did not design it. Building 2 does not appear significant under National Register/California Register Criterion C/3 or City of Los Angeles Historic-Cultural Monuments eligibility criteria 3, 4, or 5.

The subject property has not yielded, nor is it likely to yield, information important in prehistory or history and, therefore, does not appear significant under National Register/California Register Criterion D/4. Thus, Building 2 does not appear to be eligible for inclusion in the National Register or the

California Register, nor does it appear to be eligible for recognition as a City of Los Angeles Historic-Cultural Monument.

1260 and 1262 Palmetto Street (Buildings 3 and 4)

Contextual and site specific historical research was conducted to obtain the names of past owners and occupants of 1260 and 1262 Palmetto Street and to identify potential themes under which the subject property could be found eligible for inclusion on the National Register, California Register, and/or as a City Historic-Cultural Monument. Research disclosed that the property is located within one of the oldest developed areas of Los Angeles. Buildings were found to be located on the site as early as 1901; however they were razed for construction of the existing Buildings 3 and 4 in 1970 and the early 1960s.

Historical research did not reveal any significant events associated with Buildings 3 and 4. The property does not appear to be eligible for listing under National Register/California Register Criterion A/1 or City of Los Angeles Historic-Cultural Monuments eligibility criterion 1. Similarly, the subject property was not found to be associated with persons important in local, state, regional, or national history. Buildings 3 and 4 do not appear significant under National Register/California Register Criterion B/2 or City of Los Angeles Historic-Cultural Monuments eligibility criterion 2.

Buildings 3 and 4 were not found to be a significant example of industrial architecture. While the building has not been subject to significant alterations through the decades that could have compromised its integrity, it is not a significant example of reinforced concrete industrial building construction. Rather, it is a banal example of a ubiquitous building type. Buildings 3 and 4 do not embody the distinctive characteristics of a specific style, type, period, or method of construction, and a master architect did not design them. Buildings 3 and 4 do not appear significant under National Register/California Register Criterion C/3 or City of Los Angeles Historic-Cultural Monuments eligibility criteria 3, 4, or 5.

The subject property has not yielded, nor is it likely to yield, information important in prehistory or history and, therefore, does not appear significant under National Register/California Register Criterion D/4. Thus, Buildings 3 and 4 do not appear to be eligible for inclusion in the National Register or the California Register, nor do they appear to be eligible for recognition as a City of Los Angeles Historic-Cultural Monument.

Project Impact

Research did not identify an association between any of the buildings at the Project site and historic themes under which any of the buildings or structures could be deemed significant and eligible for the National Register, California Register, and/or as a City of Los Angeles Historic-Cultural Monument. The buildings were not associated with events or persons important in local, state, regional, or national history, and do not embody the distinctive characteristics of a specific style, type, period, or method of construction. The subject property has not yielded, nor is it likely to yield, information important in

prehistory or history. The buildings located at 1260 and 1262 Palmetto Street and 561, 581-585 Mateo Street do not appear to be eligible for inclusion on the National or California Registers, nor do they appear to be eligible for recognition as a City of Los Angeles Historic-Cultural Monument.

Because the buildings and structures located at 1260 and 1262 Palmetto Street and 561, 581-585 Mateo Street have been found ineligible for inclusion in the National Register, California Register, or as a City of Los Angeles Historic-Cultural Monument, a future proposed project at the property would not materially or visually impair or reduce the integrity of a historical resource. The proposed project would not result in a significant impact or substantial adverse change to historical resources under Public Resources Code §5020.1(q). No significant impacts to historical resources have been identified resultant from the proposed project, and as a result, no mitigation measures have been prescribed.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with a project would disturb archaeological resources that presently exist within the project site. Section 15064.5 of the *State CEQA Guidelines* defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources.

The Project site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas.¹⁷ The Project site is located in a highly urbanized area of the Central City North Community Plan Area of the City of Los Angeles, and has been disturbed by past development activities. The Project includes subgrade preparation. Thus, the potential exists for the accidental discovery of unknown archaeological materials. Because the presence or absence of such materials cannot be determined until the site is excavated, periodic monitoring during construction is required to identify any previously unidentified archaeological resources uncovered by Project construction activity.

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

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

¹⁷ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.*

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

- o The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and
 - o The Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report.
- Project development activities may resume once copies of the archaeological survey, study or report are submitted to:

SCCIC Department of Anthropology
McCarthy Hall 477
CSU Fullerton
800 North State College Boulevard
Fullerton, CA 92834
- Prior to the issuance of any building permit, the Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered.
- A covenant and agreement binding the Applicant to this condition shall be recorded prior to the issuance of a grading permit.

Compliance with these requirements would ensure that the Project would have a less than significant impact with respect to archaeological resources.

c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with a project were to disturb paleontological resources or geologic features which presently exist within the project site. The Project site is located in the Central City North Community Plan Area of the City of Los Angeles, and as described above, the Project site has been previously graded and is currently improved with four industrial warehouse buildings. The Project site and immediate surrounding areas do not contain any known vertebrate paleontological resources.¹⁸ Although no paleontological resources are known to exist

¹⁸ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Vertebrate Paleontological Resources in the City of Los Angeles, September 1996.*

on-site, there is a possibility that paleontological resources exist at sub-surface levels on the Project site and may be uncovered during subgrade preparation.

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

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

Compliance with these requirements would ensure that, if any such resources are found during construction of the Project, they would be handled according to the proper regulations, and impacts to potential paleontological resources that may exist beneath the Project site would be less than significant.

d) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect could occur if grading or excavation activities associated with the Project would disturb previously interred human remains. No known human burials have been identified on the Project site or its vicinity. However, it is possible that unknown human remains could

occur on the Project site, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur.

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

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

1104 N. Mission Road
Los Angeles, CA 90033
323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
323-343-0714 (After Hours, Saturday, Sunday, and Holidays)
 - The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission;
 - The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American;
 - Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.
 - The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods;
 - If the most likely descendent does not make recommendations within 48 hours, the Applicant shall reinter the remains in an area of the property secure from further disturbance, or;
 - If the Applicant does not accept the most likely descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission.

Through compliance with these requirements, potential Project impacts related to the disturbance of unknown human remains would be less than significant.

Cumulative Impacts: Cultural Resources

Less Than Significant Impact. Implementation of the Project, in combination with the other cumulative development projects in the Project site vicinity, would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. Development of the cumulative projects is expected to occur in accordance with adopted plans and regulations. With respect to cultural resources, each of the cumulative projects would be subject to site plan review and/or other planning approvals by the Director of Planning or other City decision-maker for review and approval. Thus, cumulative impacts to cultural resources would be less than significant.

6. GEOLOGY AND SOILS

This section summarizes and incorporates by reference information from the Geotechnical Study, prepared by Kleinfelder, dated October 9, 2014, and included as Appendix D to this Initial Study/Mitigated Negative Declaration. This report has been submitted to the City of Los Angeles Department of Building and Safety for review and approval. The design and construction recommendations contained in the Geotechnical Study are herein incorporated by reference.

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: 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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the Project site is located within a state-designated Alquist-Priolo Zone or other designated fault zone. Based on criteria established by the California Division of Mines and Geology (CDMG), now called California Geologic Survey (CGS), faults may be categorized as active, potentially active, or inactive. Active faults are those that show evidence of surface displacement within the last 11,000 years (Holocene-age). Potentially active faults are those that show evidence of most recent surface displacement within the last 1.6 million years (Quaternary-age). Faults showing no evidence of surface displacement within the last 1.6 million years are considered inactive for most purposes, with the exception of design of some critical structures.

Buried thrust faults are faults without a surface expression but are a significant source of seismic activity. They are typically broadly defined based on the analysis of seismic wave recordings of hundreds of small and large earthquakes in the southern California area. Due to the buried nature of these thrust faults, their existence is usually not known until they produce an earthquake. The risk for surface fault rupture potential of these buried thrust faults is inferred to be low. However, the seismic risk of these buried structures in terms of recurrence and maximum potential magnitude is not well established. Therefore, the potential for surface rupture at magnitudes higher than 6.0 cannot be precluded.

In 1972, the Alquist-Priolo Special Studies Zones Act (now known as the Alquist-Priolo Earthquake Fault Zoning Act) was passed into law. The Act defines “active” and “potentially active” faults utilizing the same aging criteria as that used by the CGS, described above. However, established state policy has been to zone only those faults that have direct evidence of movement within the last 11,000 years.

Surface rupture is defined as surface displacement that occurs along the surface trace of the causative fault during an earthquake. Based on the research of available literature described in the Geotechnical Study, no known active or potentially active faults underlie the Project site. In addition, the Project site is not located within an Alquist-Priolo Earthquake Fault Zone/State of California Special Studies Zone.

In addition, the 2011 City of Los Angeles Building Code, updated since the 1994 Northridge Earthquake and with which the Project would be required to comply, contains construction requirements to ensure habitable structures are built to a level such that they can withstand acceptable seismic risk.

Based on the information contained in the Geotechnical Study, the Project site is not located within a seismic hazard zone for liquefaction, landsliding, or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Alquist-Priolo Act. The Project site is not located within an Alquist-Priolo Earthquake Fault Zone, and there are no known faults (active, potentially active, or inactive) on-site. The possibility of damage due to ground rupture is considered low since active faults are not known to cross the Project site. Therefore, impacts related to ground rupture from known earthquake faults would be less than significant.

b) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?

Potentially Significant Unless Mitigation Incorporated. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California. The Project site is located within a seismically active region, as is all of Southern California. The intensity of ground shaking depends primarily upon the earthquake magnitude, the distance from the source, and the site response characteristics. As discussed previously, the Project site is not located within a seismic hazard zone for liquefaction, landsliding, or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Alquist-Priolo Act. The primary seismic hazard for this project is the potential for strong ground motion from future earthquakes within the Los Angeles Basin. Secondary effects of seismic shaking resulting from large earthquakes on the major faults in the Southern California region which may affect the site include ground lurching and shallow ground rupture, soil liquefaction, dynamic settlement, seiches and tsunamis. These secondary effects of seismic shaking are a possibility throughout the Southern Californian region and are dependent on the distance between the site and causative fault and the on-site geology.

The major active nearby (within about 15 km) faults that could produce these secondary effects include the Elysian Park, Puente Hills, Hollywood, Santa Monica, Newport-Inglewood, and Verdugo Faults (USGS, 2008). However, the potential for strong ground motion at this site is not unusual for Southern California. With regard to the potential occurrence of potentially catastrophic geotechnical hazards such as fault rupture, earthquake-induced landslides, liquefaction, etc., the following geotechnical recommendations should provide adequate protection for the proposed development to the extent required to reduce seismic risk to an “acceptable level.” Site parameters for seismic design are presented in Table 1 of the Geotechnical Study (see Appendix C).

Seismically induced settlement is often caused when loose to medium-dense granular soils are densified during ground shaking. Based on the Geotechnical Study’s subsurface evaluation, subsurface soils at the site consist of approximately two to five feet of fill and disturbed earth from previous development. The fill is undocumented and not considered suitable for structural support. Underlying the fill are alluvial sediments that consist primarily of sand and gravel. Within the sand and gravel deposits are relatively thin discontinuous layers of clay and silt. These soils are consistent with the types of sedimentary deposits mapped for the area.

In order to provide a stable foundation for the Project, the Geotechnical Study recommends that all existing development, abandoned utilities, pavements, foundations, and other existing improvements within the proposed Project construction areas should be removed and the excavation(s) backfilled with engineered fill. Debris produced by demolition operations, including wood, steel, piping, plastics, etc., should be separated and disposed of off-site. Existing utility pipelines or conduits that extend beyond the limits of the proposed construction and are to be abandoned in place, should be plugged with non-shrinking cement grout to prevent migration of soil and/or water. Areas to receive fill should be stripped of all dry, loose or soft earth materials and undocumented fill materials.

With implementation of the individual recommendations in the Geotechnical Study, the potential for seismically induced settlement at the Project site is considered small. Additionally, the design and construction of the Project is required to comply with the most current codes regulating seismic risk, including the California Building Code and the LAMC, which incorporates the International Building Code (IBC). Compliance with current California Building Code and LAMC requirements would minimize the potential to expose people or structures to substantial risk, loss, or injury. Therefore, impacts related to seismic ground shaking would be less than significant.

Accordingly, the following mitigation measures are recommended to reduce impacts associated with seismic hazards to a less than significant level.

Mitigation Measures:**6-1 Geology and Soils (Seismic)**

- The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

6-2 Geology and Soils (Geotechnical Report)

- The Applicant shall comply with the recommendations contained within the Geotechnical Report (Appendix A to the IS/MND), as well as all conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the At Mateo Project, and as it may be subsequently amended or modified.

c) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project site is located within a liquefaction zone. Liquefaction is the loss of soil strength or stiffness due to a buildup of pore-water pressure during severe ground shaking. Liquefaction is associated primarily with loose (low density), saturated, fine- to medium-grained, cohesionless soils. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

Groundwater was not observed in borings drilled to a maximum depth of approximately 50.5 feet below ground surface at the Project site. Historical high groundwater levels in the general area have been mapped deeper than 100 feet below grade. Fluctuations of the groundwater level, localized zones of perched water, and increased soil moisture content should be anticipated during and following the rainy season. Irrigation of landscaped areas on or adjacent to the site can also cause a fluctuation of local groundwater levels.

According to the CDMG Seismic Hazard Zones Map of the Los Angeles Quadrangle (1999), and the City of Los Angeles Seismic Safety Element (1990), the Project site is not located within an area identified as having a potential for liquefaction. This classification is consistent with the Geotechnical Study's site-specific observations, which indicate that due to the general dense nature of site soils and lack of shallow groundwater the potential for liquefaction and seismically induced settlement and compression is expected to be low.

Therefore, the potential for liquefaction to result in significant structural damage at the Project site is low and a less than significant impact would occur.

d) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. A project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding. According to the Geotechnical Study, the Proposed Project is not located within a seismic hazard zone for liquefaction, landsliding or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Alquist-Priolo Act. Additionally, due to the subsurface geotechnical characteristics, the relatively flat nature of the site, and low potential for liquefaction, the potential for lateral spreading is expected to be very low. Therefore the probability of landslides, including seismically induced landslides, is considered to be very low, and no impact would occur.

e) Would the project result in substantial soil erosion or the loss of topsoil?

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

The area surrounding the Project site is paved and developed, and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. During construction, the Project would be required to prevent the transport of sediments from the site by stormwater runoff and winds through the incorporation of appropriate Best Management Practices (BMPs). These BMPs would be detailed in a Low Impact Development Plan and, if applicable, a Stormwater Pollution Prevention Plan (SWPPP), which would be in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations and would be approved by the City Engineer. With implementation of the required construction BMPs (as described in Mitigation Measure 6-3), the impacts of soil erosion during construction would be less than significant.

All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. With implementation of Mitigation Measure

6-3, a less than significant impact would occur with respect to erosion or loss of topsoil. This mitigation measure is in addition to any conditions that may be imposed by the City of Los Angeles Department of Building and Safety's Soils Report Approval Letter.

The potential for soil erosion during the ongoing operation of the Project is extremely low due to the generally level topography of the Project site and the fact that the Project site would be mostly paved-over or built upon, so little soil would be exposed. Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil. The entirety of the Project site would be covered by the proposed structures. Thus, no exposed areas subject to erosion would be created or affected by the Project. Therefore, the impacts of soil erosion during Project operation would be less than significant.

Mitigation Measures:

6-3 Geology and Soils (Erosion/Grading/Short-Term Construction Impacts)

- The Applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.
- Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. The Applicant shall implement Best Management Practices ("BMPs") during grading and excavation to reduce erosion, including, but not limited to the following:
 - o Excavation and grading activities shall be scheduled during dry weather periods to the extent practical. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.
 - o Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a biodegradable soil stabilizer.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it could cause or accelerate geologic hazards causing substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if the Project is built in an unstable area without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. The Geotechnical Study concluded

that the potential for seismically induced settlement at the Project site is considered small, provided that the recommendations specified in the Geotechnical Study (and the City's approval letter) are included in the design and construction of the Project to the satisfaction of the Department of Building and Safety. Construction of the Project would comply with the City of Los Angeles Uniform Building Code (Building Code), which is designed to assure safe construction and includes building foundation requirements appropriate to site conditions. The Geotechnical Study (see Appendix A) concluded that the potential for landslide, lateral spreading, subsidence, liquefaction, or collapse at the Project Site is low. Thus, the Project would have a less than significant impact with respect to these geologic hazards.

g) Would the project be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and which shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Without proper mitigation measures, heaving and cracking of both building foundations and slabs-on-grade could result.

Changes in soil moisture content can result from precipitation, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors and may result in unacceptable settlement or heave of structures or concrete slabs supported on grade. The Geotechnical Study found that the upper fill and alluvial soils at the Project Site are generally granular in nature (silty sand and sand with various amount of gravel); therefore, the potential for soil expansion at the site is very low and the Project would have a less than significant impact with respect to this potential hazard.

Nonetheless, construction of the Project would be required to comply with the City of Los Angeles Uniform Building Code, which includes building foundation requirements appropriate to site-specific conditions, as recommended in the Geotechnical Study.

h) 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. This question would apply to the Project only if it was located in an area not served by an existing sewer system. The Project site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City of Los

Angeles. Septic tanks or alternative disposal systems are neither necessary nor proposed as part of the Project. Therefore, no impacts related to alternative wastewater disposal systems would occur.

Cumulative Impacts: Geology and Soils

Less Than Significant Impact. Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the proposed Project and the other cumulative projects. Similar to the proposed developments, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the cumulative development projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Project's geology and soils impacts concluded that, through the implementation of the mitigation measures recommended above, potential impacts would be reduced to less than significant levels. Therefore, cumulative geology and soil impacts would be less than significant.

7. GREENHOUSE GAS EMISSIONS

GHG and Global Climate Change Background

Gases that trap heat in the atmosphere are called greenhouse gases ("GHG"), 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 regulates the earth's temperature. The State of California 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 proposed Project, including construction and operational activities, would have the potential to generate greenhouse gas emissions.

The principal GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H₂O). CO₂ is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e).

California has enacted several pieces of legislation that relate to GHG emissions and climate change, much of which sets aggressive goals for GHG reductions within the state. Per Senate Bill 97, the California Natural Resources Agency adopted amendments to the CEQA Guidelines, which address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project's effects on the environment. However, neither a threshold of significance nor any specific mitigation measures are included or provided in these CEQA Guideline amendments.

The global nature of climate change creates unique challenges for assessing the Project's climate change impact under CEQA, which focuses on cause and effect. When compared to the cumulative inventory of

GHG across the globe, a single project's impact will be negligible. To further complicate this, there is debate about whether a project's emissions are adding to the net emissions worldwide, or simply redistributing emissions that would have occurred anyway somewhere in the world.

Climate change analyses are also unique because emitting CO₂ into the atmosphere is not itself an adverse environmental effect. It is the increased concentration of CO₂ in the atmosphere resulting in global climate change and the associated consequences of climate change that results in adverse environmental affects (e.g., sea level rise, loss of snowpack, severe weather events). Although it is possible to estimate a project's incremental contribution of CO₂ into the atmosphere, it is typically not possible to determine whether or how an individual project's relatively small incremental contribution might translate into physical effects on the environment. Nevertheless, both short-term impacts occurring during construction and long-term effects related to the ongoing operation of the Project are discussed in this section.

Regulatory Environment

Assembly Bill 32 (Statewide GHG Reductions)

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires the California Air Resources Board (CARB) to develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed to set a statewide GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020. As previously determined by CARB, California had to reduce GHG emissions to a level approximately 28.4% below CARB's 2020 "business-as-usual" GHG emission projections (as set forth in the 2008 Scoping Plan) to achieve this goal.¹⁹ The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions. Key AB 32 milestones were as follows:

- June 30, 2007 - Identification of discrete early action greenhouse gas emissions reduction measures. On June 21, 2007, CARB satisfied this requirement by approving three early action measures. These were later supplemented by adding six other discrete early action measures.
- January 1, 2008 - Identification of the 1990 baseline GHG emissions level and approval of a statewide limit equivalent to that level. Adoption of reporting and verification requirements concerning GHG emissions. On December 6, 2007, CARB approved a statewide limit on GHG emissions levels for the year 2020 consistent with the determined 1990 baseline.

¹⁹ CARB has not calculated the percent reduction required to achieve AB 32's mandate of returning to 1990 levels of GHG emissions by 2020. The value of 28.4% is the required reduction to achieve 1990 emissions in 2020 is an approximate value. Based on the Scoping Plan estimates and conservative rounding, the value could be 28.5%.

- January 1, 2009 - Adoption of a scoping plan for achieving GHG emission reductions. On October 15, 2008, CARB issued a “discussion draft” Scoping Plan entitled “Climate Change Draft Scoping Plan: A Framework for Change” (Draft Scoping Plan). CARB adopted the Draft Scoping Plan at its December 11, 2008 meeting.
- January 1, 2010 - Adoption and enforcement of regulations to implement the “discrete” actions.
- January 1, 2011 - Adoption of GHG emissions limits and reduction measures by regulation.
- January 1, 2012 - GHG emissions limits and reduction measures adopted in 2011 become enforceable.

Emission reduction measures that cannot be initiated in the 2007-2012 timeframe were considered in the Scoping Plan, which was published by CARB in December 2008. The Scoping Plan is defined by AB 32 as “achieving the maximum technologically feasible and cost-effective reductions in GHG emissions from sources or categories of sources of GHGs by 2020.” Scoping Plan measures include direct emission reductions, alternative compliance mechanisms, market-based compliance mechanisms, and potential monetary and non-monetary incentives for sources for categories. By January 1, 2014 and every five years thereafter, CARB will update its Scoping Plan.

CARB developed a list of “discrete early actions” to reduce GHG emissions. Early action measures are those that were developed for implementation by January 2010. CARB approved the expanded list of early action measures on October 25, 2007. The nine discrete early action measures are:

- Increased Methane Capture from Landfills: On June 17, 2010, the regulation to reduce CH₄ emissions from municipal solid waste (MSW) landfills became effective. It requires owners and operators of certain uncontrolled MSW landfills to install gas collection and control systems, and requires existing and newly installed gas collection and control systems to operate in an optimal manner. The regulation is a discrete early action measure to reduce greenhouse gas emissions in California as described in the Global Warming Solutions Act. The Landfill Methane Control Measure incorporates the Intergovernmental Panel on Climate Change (IPCC’s) calculation methods, as indicated in Appendix I of the final rule.
- Low-Carbon Fuel Standard (LCFS): Requires the implementation of a low carbon fuel standard that reduces the carbon content of fuels used for motor vehicles.
- Reduction of Motor Vehicle A/C Refrigerant Losses: This measure restricts the sale of “do-it-yourself” automotive refrigerants to the public. This will restrict the refrigerant changes to professionals and will, as a result, reduce losses of these high global warming potential (GWP) gases.
- Smartway Truck Efficiency: Requires existing trucks and trailers to be retrofitted with devices that reduce aerodynamic drag, thus resulting in a 1.3 million metric tonne (MMT) reduction of GHG equivalents as well as reducing fuel consumption.

- Port electrification: This measure will require docked ships to shut off their auxiliary engines by plugging into shoreside electrical outlets. This project will also reduce GHG emissions by 500,000 MT every year.
- Reduction of perfluorocarbons from the semiconductor industry: Alternative chemistry development, emissions abatement, and recovery and recycling will lessen GHG emissions by 500,000 MT annually.
- Reduction of propellants in consumer products: Aerosols, tire inflators, electronics cleaning, and dust removal products all contain propellants that contribute an estimated 300,000 MT of GHG emissions in California every year.
- Tire inflation: CARB will craft regulations requiring tune-up, smog check, and oil change mechanics to ensure proper tire inflation as part of overall service. California will see a 200,000 MT reduction in GHG emissions.
- SF₆ reductions from non-electricity sector: CARB proposes to ban the use of SF₆ from non-essential uses if viable alternatives are available.

As of April 22, 2010, 14 of 30 CARB regulations were approved, including all nine discrete early actions as required by AB 32. It is estimated that the nine proposed discrete early actions will provide approximately 16 MMTCO₂e of GHG reductions while the other early actions will provide approximately 26 MMTCO₂e of GHG reductions. It also is anticipated that an additional 30 MMTCO₂e in reductions will be achieved from the passage of anti-idling measures and AB 1493.6. The remaining reductions necessary to achieve the goals of AB 32 (i.e., 1990 levels by 2020) are expected to be achieved through CARB's Scoping Plan and other emission reduction efforts by members of the Climate Action Team (CAT).

On August 19, 2011, following legal action in opposition to the 2008 Scoping Plan, CARB updated the Scoping Plan through a Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED, or 2011 Scoping Plan).²⁰ CARB's updated projected BAU emissions in the 2011 Scoping Plan is based on current (as of October 2010) economic forecasts (which was influenced by the economic downturn) and certain GHG reduction measures already in place. The updated calculation of the 2011 Scoping Plan's estimates for projected emissions in 2020 now totals 506.8 MMTCO₂E (or approximately 507 MMTCO₂E). Based on this update, CARB estimates only a 16 percent reduction below the estimated statewide BAU emission levels would now be necessary to achieve 1990 emission levels (i.e., 427 MMTCO₂E) by 2020, instead of the 28.35 percent reduction previously reported under the 2008 Scoping Plan.²¹ This revised estimate is summarized in Table IV-6, 2011 Scoping Plan Estimate of Emissions Reductions.

²⁰ *Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, CARB, August 19, 2011.*

²¹ *Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, page 11, CARB, August 19, 2011.*

California Senate Bills 1078, 107, and 2; Renewables Portfolio Standard

Established in 2002 under California Senate Bill 1078 and accelerated in 2006 under California Senate Bill 107, California's RPS requires retail suppliers of electric services to increase procurement from eligible renewable energy resources by at least 1 percent of their retail sales annually, until they reach 20 percent by 2010.

On April 2, 2011, Governor Jerry Brown signed California Senate Bill 2 to increase California's RPS to 33 percent by 2020. This new standard also requires regulated sellers of electricity to procure 25 percent of their energy supply from certified renewable resources by 2016.

Table IV-6
2011 Scoping Plan Estimate of Emissions Reductions

Emission Category	GHG Emissions (MMTCO₂E)
2008 Scoping Plan	
2020 BAU Forecast (CARB 2008 Scoping Plan)	596
2020 Emissions Target Set by AB 32 (i.e., 1990 level)	427
Reduction below Business As Usual necessary to achieve 1990 levels by 2020	169 (28.35%)^a
2011 Scoping Plan	
Revised 2020 BAU Forecast (CARB 2011 Scoping Plan)	507
2020 Emissions Target Set by AB 32 (i.e., 1990 level)	427
Percent Reduction below Business As Usual necessary to achieve 1990 levels by 2020	80 (16%)^b
^a . $596 - 427 = 169 / 596 = 28.35\%$ ^b . $507 - 427 = 80 / 507 = 15.779\%$ (or approximately 16%). Source: Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, Table 1.2-3 and page 11, CARB, August 19, 2011.	

Low Carbon Fuel Standard

California Executive Order S-01-07 (January 18, 2007) requires a 10 percent or greater reduction in the average carbon intensity for transportation fuels in California regulated by CARB. CARB identified the LCFS as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009.

Sustainable Communities and Climate Protection Act (SB 375)

California's Sustainable Communities and Climate Protection Act, also referred to as Senate Bill (SB) 375, became effective January 1, 2009. The goal of SB 375 is to help achieve AB 32's GHG emissions reduction goals by aligning the planning processes for regional transportation, housing, and land use. SB 375 requires CARB to develop regional reduction targets for GHGs, and prompts the creation of regional plans to reduce emissions from vehicle use throughout the State. California's 18 Metropolitan Planning Organizations (MPOs) have been tasked with creating Sustainable Community Strategies (SCS) in an effort to reduce the region's vehicle miles traveled (VMT) in order to help meet AB 32 targets through integrated transportation, land use, housing and environmental planning. Pursuant to SB 375, CARB set per-capita GHG emissions reduction targets from passenger vehicles for each of the State's 18 MPOs. On September 23, 2010, CARB issued a regional eight (8) percent per capita reduction target for the planning year 2020, and a conditional target of 13 percent for 2035.

With respect to motor vehicles, page 48 of the 2008 Scoping Plan states that local governments will play a significant role in the regional planning process to reach passenger vehicle greenhouse gas emissions reduction targets. Local governments have the ability to directly influence both the siting and design of new residential and commercial developments in a way that reduces greenhouse gases associated with vehicle travel, as well as energy, water, and waste. A partnership of local and regional agencies is needed to create a sustainable vision for the future that accommodates population growth in a carbon efficient way while meeting housing needs and other planning goals. Integration of the sustainable communities strategies or alternative planning strategies with local general plans will be key to the achievement of these goals. State, regional, and local agencies must work together to prioritize and create the supporting policies, programs, incentives, guidance, and funding to assist local actions to help ensure regional targets are met. Enhanced public transit service combined with incentives for land use development that provides a better market for public transit will play an important role in helping to reach regional targets. Thus, based on the above targets noted in the Scoping Plan, a new development project that can demonstrate it directly influences both the siting and design of new residential and commercial developments in a way that reduces greenhouse gases associated with vehicle travel would be considered consistent with statewide GHG-reduction goals and policies, including AB 32, and does not make a cumulatively considerable contribution to global warming.

Local Policies and Regulations

The City is addressing the issue of global climate change through implementation of the Green LA Plan, An Action Plan to Lead the Nation in Fighting Global Warming (LA Green Plan), which outlines the goals and actions that the City has established to reduce the generation and emission of GHGs from public and private activities. According to the LA Green Plan, the City is committed to the goal of reducing emissions of CO₂ to 35 percent below 1990 levels by the year 2030. To achieve this goal, the City is increasing the generation of renewable energy, improving energy conservation and efficiency, and changing transportation and land use patterns to reduce dependence on automobiles.

LA Green Code

In 2010, the City adopted the 2010 California Green Building Standards Code, also known as CALGreen, with amendments, as Ordinance No. 181,480, thereby codifying provisions of CALGreen as the new Los Angeles Green Code (“LA Green Code”). As of January 2011, the LA Green Code is applicable to the construction of new buildings (residential and nonresidential), building alterations with a permit valuation of over \$200,000, and residential and nonresidential building additions. The LA Green Code contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. The L.A. Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy Commission on December 17, 2008, and meet 50 percent construction waste recycling levels. In addition, the proposed Project is required to implement applicable energy conservation measures to reduce GHG emissions such as those described in AB 32, described above.

GHG Significance Threshold

The *L.A. CEQA Thresholds Guide* does not provide any guidance as to how climate change issues are to be addressed in CEQA documents. Furthermore, neither the SCAQMD nor the State CEQA Guidelines Amendments provide any adopted thresholds of significance for addressing a mixed-use project’s GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines Amendments serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City of Los Angeles does not have an adopted quantitative threshold of significance for a mixed-use project’s generation of greenhouse gas emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines.

As required in Section 15604.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) an estimate of the amount of greenhouse gas emissions resulting from the proposed Project; (2) a qualitative analysis or performance based standards; (3) a quantification of the extent to which the proposed Project increases greenhouse gas emissions as compared to the existing environmental setting; and (4) the extent to which the Project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

With respect to demonstrating consistency with AB 32 and the State’s Scoping Plan, one methodology commonly used to demonstrate consistency with the State’s Scoping Plan is to compare the proposed Project’s mitigated scenario to a BAU scenario that quantifies the project’s potential GHG emissions absent the Project’s project design features, energy conservation commitments, and GHG emission regulations that have since been enacted and signed into law in response to AB 32. This assessment essentially provides a quantified estimate of the Project’s GHG emissions as if the State were to proceed on its pre-AB 32 emissions track. As discussed previously in this section, CARB estimates a 16 percent reduction below the estimated statewide BAU levels would now be necessary to return to 1990 emission

levels (i.e., 427 MMTCO₂E) by 2020, instead of the 28.35% BAU reduction previously reported under the 2008 Scoping Plan. Therefore, a project that is able to demonstrate a 16 percent or larger reduction in GHG emissions as compared to the BAU scenario, would be considered consistent with AB 32 and the State's goal of achieving 1990 GHG emission levels by the year 2020 and its impact with respect to climate change would be considered less than significant.

Construction emissions represent an episodic, temporary source of GHG emissions. Emissions are generally associated with the operation of construction equipment and the disposal of construction waste. To be consistent with the guidance from the SCAQMD for calculating criteria pollutants from construction activities, only GHG emissions from on-site construction activities and off-site hauling and construction worker commuting are considered project generated. As explained by California Air Pollution Controls Officers Association (CAPCOA) in its 2008 white paper, the information needed to characterize GHG emissions from manufacture, transport, and end-of-life of construction materials would be speculative at the CEQA analysis level. CEQA does not require an evaluation of speculative impacts (*CEQA Guidelines §15145*). Therefore, the construction analysis does not consider such GHG emissions, but does consider non-speculative on-site construction activities and off-site hauling and construction worker trips. All GHG emissions are reported on an annual basis.

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

Less Than Significant Impact. Construction of the proposed Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment, including trucks utilized to haul excavated soil material and debris from the site to designated disposal sites, and through vehicle trips generated by construction workers traveling to and from the Project site. These impacts would vary day to day over the 18-month duration of construction activities. As illustrated in Table IV-7, construction emissions of CO₂ would peak in 2015, when up to 6,569 pounds of CO₂e per day are anticipated, primarily during the demolition and grading phases. Detailed information on the GHG emission modeling conducted for this IS/MND is included in Appendix B.

**Table IV-7
Estimated Construction GHG Emissions – Mitigated (Metric Tons)**

Year	CO₂	CH₄	N₂O	CO₂e
2015	6,544	1	0	6,569
2016	4,378	1	0	4,394

Source: DKA Planning 2015, based on CalEEMod 2013.2.2

Greenhouse gas emissions were calculated for long-term area source and motor vehicle operations. As shown in Table IV-8, the proposed Project would emit 6,356 metric tons of CO₂e per year during typical operations.

Table IV-8
Estimated Annual Project CO₂e Greenhouse Gas Emissions (Metric Tons per Year)

Scenario and Source	Business As Usual Scenario*	As Proposed Scenario**	Reduction from Business As Usual Scenario	Change from Business as Usual Scenario
Area Sources	<1	<1	-	0%
Energy Sources	2,083	1,467	-616	-42%
Mobile Sources	5,930	4,569	-1,362	-30%
Waste Sources	79	79	-	0%
Water Sources	217	217	-	0%
Construction	24	24	-	0%
Total Emissions	8,333	6,356	-1,978	-24%
<i>Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.</i>				
<i>* BAU scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).</i>				
<i>** To ensure a conservative analysis that focuses on the proposed Project's gross impact on climate change, the "As Proposed" scenario does not discount emissions from existing development on the Project site.</i>				
<i>Source: DKA Planning, 2015</i>				

At this time, as discussed above, there are no adopted numeric thresholds that govern the determination of the significance of the Project's GHG emissions. The SCAQMD has adopted neither a methodology to quantify nor a significance threshold for GHG emissions for development projects. Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction and vegetation removal were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The Project emission reductions are results of Project's commitments and regulatory changes, which include the implementation of the Renewables Portfolio Standard (RPS) of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS).

As shown in Table IV-8, the emissions for the Project and its associated CARB 2020 NAT scenario are estimated to be 6,356 and 8,333 MT CO₂e per year, respectively, which shows the Project will reduce emissions by 24 percent from the CARB 2020 NAT scenario. Based on these results, the Project meets the reduction target (15.8 percent) set forth in the May 22, 2014 revised AB 32 Scoping Plan to achieve in 2020 emissions levels in the "business as usual" condition. As a result, the Project's contribution to global climate change is not "cumulatively considerable" and is considered less than significant.

The proposed Project would comply with the City of Los Angeles' Green Building Ordinance standards that are equivalent to LEED certification, reduce emissions beyond a "Business-as-Usual" scenario, and are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the State's codes. Under the City's Los Angeles Green Building Code, the Project must incorporate several measures and design elements that reduce the carbon footprint of the development:

1. GHG Emissions Associated with Planning and Design. The Project must have measures to reduce storm water pollution, provide designated parking for bicycles and low-emission vehicles, have wiring for electric vehicles, reduce light pollution, and design grading and paving to keep surface water from entering buildings.
2. GHG Emissions Associated with Energy Demand. The Project must meet Title 24 2008 standards and include Energy Star appliances, have pre-wiring for future solar facilities, and off-grid pre-wiring for future solar facilities.
3. GHG Emissions Associated with Water Use. The Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. Wastewater reduction measures must be included that help reduce outdoor potable water use.
4. GHG Emissions Associated with Solid Waste Generation. The Project is subject to construction waste reduction of at least 50 percent. In addition, project site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. The Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.
5. GHG Emissions Associated with Environmental Quality. The Project must meet strict standards for any fireplaces and woodstoves, covering of duct openings and protection of mechanical equipment during construction and meet other requirements for reducing emissions from flooring systems, any CFC and halon use, and other project amenities.

In addition to the GHG emission reductions described above, it is important to note that the CO₂ estimates from mobile sources (particularly CO₂, CH₄, and N₂O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing conditions. This is a standard approach taken for air quality analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the air basin and are in effect new emissions sources or whether they are sources that were already in the air basin and just shifted to a new location. Because the effects of GHGs are global, a project that

shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

For example, if a substantial portion of California's population migrated from the South Coast Air Basin to the San Joaquin Valley Air Basin, this would likely decrease GHG emissions in the South Coast Air Basin and increase emissions in the San Joaquin Valley Air Basin, but little change in overall global GHG emissions. However, if a person moves from one location where the land use pattern requires auto use (e.g., commuting, shopping) to a new development that promotes shorter and fewer vehicle trips, more walking, and overall less energy usage, then it could be argued that the new development would result in a potential net reduction in global GHG emissions.

It is impossible to know at this time whether employees and visitors of the Project would have longer or shorter trips relative to their destinations; whether they would walk, bike, and use public transportation more or less than under existing circumstances; and whether their overall driving habits would result in higher or lower VMT. Much of the vehicle-generated CO₂ emissions attributed to the Project could simply be from vehicles at an existing location moving to the Project site and not from new vehicle emissions sources relative to global climate change. Therefore, although it is not possible to calculate the net contribution of vehicle-generated CO₂, CH₄, and N₂O emissions from the Project (i.e., project generated emissions minus current emissions from vehicles that would move to the Project site), the net contribution would likely be much less than the estimated emissions. In order to ensure that the Project is equipped to reduce GHG emissions associated with vehicles accessing the site beyond what the City's Green Building Ordinance requires, Mitigation Measure 7-1 is recommended to provide accommodation for electronic vehicles.

Mitigation Measures:

7-1 Greenhouse Gas Emissions (Electronic Vehicle Accommodation)

- Electronic Vehicle (EV) ready conduits shall be installed for a minimum of twenty percent of the parking spaces located within the Project parking structure.

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

Less Than Significant Impact. The Project will contribute to cumulative increases in GHG emissions over time in the absence of policy intervention. However, the AB 32 Scoping Plan provides the basis for policies that will reduce cumulative GHG emissions within California to 1990 levels by 2020. As a result, the proposed Project is judged against its consistency with the AB 32 Scoping Plan to determine whether it will result in adverse cumulative impacts to global climate change. As shown in Table IV-9, the Project would be consistent with all feasible and applicable strategies recommended in the Scoping Plan. As a result, the Project's cumulative impact on climate change is considered less than significant.

Table IV-9
Project Consistency with AB 32 Scoping Plan Greenhouse Gas Emissions Reduction Strategies

Strategy	Project Consistency
California Cap-and-Trade Program. Implement a broad-based California cap-and-trade program to provide a firm limit on emissions.	N/A. The statewide program is not relevant to the proposed Project.
California Light-Duty Vehicle Greenhouse Gas Standards. Implement adopted Pavley standards and planned second phase of the system. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	N/A. The development of standards is not relevant to the proposed Project.
Energy Efficiency. Maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	Consistent. The Project is designed to meet Cal Green building standards by including several measures designed to reduce energy consumption.
Renewables Portfolio Standard. Achieve 33 percent renewable energy mix statewide.	Consistent. The Project will utilize energy from the Los Angeles Department of Water and Power, which has goals to diversify its portfolio of energy sources to increase the use of renewable energy.
Low-Carbon Fuel Standard. Develop and adopt the Low Carbon Fuel Standard.	N/A. The statewide program is not relevant to the proposed Project.
Regional Transportation-Related Greenhouse Gases. Develop regional greenhouse gas emissions reduction targets for passenger vehicles.	N/A. The development of regional planning goals is not relevant to the proposed Project. The project's infill location near several Metro bus routes and within one mile of Metro's Union Station make it consistent with the smart growth objectives of the region's Sustainable Communities Strategy (SCS).
Vehicle Efficiency Measures. Implement light-duty vehicle efficiency measures.	N/A. State agencies are responsible for implementing efficiency measures.
Goods Movement. Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	N/A. State agencies are responsible for implementing regulations and promoting efficiency in goods movement.
Million Solar Roofs Program. Install 3,000 MW of solar-electric capacity under California's existing solar programs.	Neutral. The proposed Project does not include solar roofs and is not part of the proposed Statewide initiative.
Medium/Heavy-Duty Vehicles. Adopt medium and heavy-duty vehicle efficiency measures.	N/A. State agencies are responsible for implementing efficiency measures.
Industrial Emissions. Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission.	N/A. This measure addresses industrial facilities.
High Speed Rail. Support implementation of a high speed rail system.	N/A. This calls for the California High Speed Rail Authority and stakeholders to develop a statewide rail transportation system.
Green Building Strategy. Expand the use of green building	Consistent. The Project is designed to

Table IV-9
Project Consistency with AB 32 Scoping Plan Greenhouse Gas Emissions Reduction Strategies

Strategy	Project Consistency
practices to reduce the carbon footprint of California's new and existing inventory of buildings.	meet Cal Green building standards and will include several measures designed to reduce energy consumption.
High Global Warming Potential Gases. Adopt measures to reduce high global warming potential gases.	N/A. State agencies are responsible for implementing these measures.
Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling. Move toward zero waste.	Consistent. The Project is expected to have minimal impact on solid waste facilities.
Sustainable Forests. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	N/A. Resource Agency departments are responsible for implementing this measure.
Water. Continue efficiency programs and use cleaner energy sources to move and treat water.	Consistent. The Project would use water-efficient landscaping.
Agriculture. In the near-term, encourage investment in manure digester and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	N/A. The proposed Project does not include agricultural facilities.
Source: CAJA Environmental Services, LLC, 2015; DKA Planning, 2015.	

Cumulative Impacts: Greenhouse Gas Emissions

An individual project's GHG emissions typically would be relatively very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change, which can cause the adverse environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions determines whether a project's contribution to global climate change is "cumulatively considerable." Many regulatory agencies, including the SCAQMD, concur that GHG and climate change should be evaluated as a potentially significant cumulative impact, rather than a project direct impact. Accordingly, the GHG analysis presented in this section analyzes whether the Project, in conjunction with cumulative development projects in the general vicinity, would be cumulatively considerable using a plan-based approach (and quantitative and qualitative analysis) to determine the projects' contributing effect on climate change.

Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, it is speculative to identify the specific impact, if any, to global climate change from one project's incremental increase in global greenhouse gas emissions. The cumulative projects' greenhouse gas emissions and the resulting level of significance of these potential impacts are more properly assessed in terms of the cumulative impact on global GHG emission on climate change. As shown in the tables above, the proposed Project is consistent with statewide goals and policies in place for the reduction of

greenhouse gas emissions, including AB 32 and the Scoping Plan. Therefore, the contributions of the Proposed Project to cumulative GHG emissions would not be considerable.

8. HAZARDS AND HAZARDOUS MATERIALS

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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Project includes the construction of a commercial retail/office project including restaurant space. No hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes and in restaurant/food service supplies would routinely be transported to the site and use of these substances would comply with State Health Codes and Regulations. Therefore, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and a less than significant impact would occur.

Construction could involve the use of potential hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. There is nothing unique or specific about the Project or its location that would warrant any mitigation beyond general compliance.

Therefore, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

b) Would the project create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Potentially Significant Unless Mitigation Incorporated. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project utilizes hazardous materials as part of its routine operations and could potentially pose a hazard to nearby sensitive receptors under accident or upset conditions.

The Project site was previously developed with three industrial warehouse buildings. Based on a review of historic aerial photographs and records, it appears that the Project site has been utilized for industrial warehouse and/or manufacturing purposes since the beginning of the 20th century. As is discussed under Cultural Resources, oil storage tanks were formerly located on the Project site but were removed during the middle of the 20th century. The Project site is surrounded primarily by residential, commercial, and

light industrial properties. The closest residential properties are located across the street to the north of the Project site on Palmetto Street.

Soils investigations undertaken at the Project site have revealed approximately 941.5 cubic yards of soil material that is impacted by elevated concentrations of lead, cadmium, and total petroleum hydrocarbon (TPH). The specific source(s) of the soil contamination is unclear, but it is suspected to originate from the site's previous industrial uses, dating back to the early 1900s. Site investigations have concluded that the impacted soil appears to be confined to the uppermost four feet of soil beneath a portion of the site. A Draft Remedial Action Work Plan (RAW) has been prepared for the Project and is subject to required approval by the California Department of Toxic Substances Control (DTSC). The RAW (included as Appendix G to this IS/MND) contains a complete characterization of the soil samples taken at the site and their contaminant levels. Lead and cadmium concentrations in some of the samples exceed the applicable DTSC screening levels for residential uses. In addition, TPH concentrations in some of the samples exceed the applicable RWQCB screening levels.

Due to this impact associated with legacy contaminants in some of the soils on the Project site, Project construction impacts associated with soil disturbance and grading would be considered significant prior to mitigation. In accordance with the recommended remedial alternative in the RAW, the contaminated soil materials must be removed from the site and disposed of in a landfill permitted to accept hazardous waste. The RAW contains a series of prescribed measures for accomplishing the soil removal. Implementation of Mitigation Measure 8-1 would ensure that impacts associated with the presence of contaminated soil on the Project site would be reduced to a less than significant level. Additionally, Mitigation Measure 6-2 above, which requires compliance with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Project, and as it may be subsequently amended or modified, would ensure that potential impacts are minimized.

The site is located within an oil-producing region and is less than 1,000 feet southwest of the Union Station Oil Field with four wells located within 1,500 of the site. The California Division of Oil, Gas and Geothermal Resources (DOGGR) reports these four wells as plugged. The oil wells in the immediate vicinity of the site and the proximity to the Union Station Oil Field introduce the potential for the presence of naturally occurring oil field gases, including methane, occurring within subsurface soils at the site. The site is located within a City of Los Angeles designated Methane Zone. As such, development at the site will be required to conform to applicable municipal codes and incorporate a means to control methane intrusion from the geologic formation. Through compliance with these codes, potential impacts resulting in accidental risk of upset would be less than significant.

Mitigation Measures:**8-1 Hazards and Hazardous Materials (Soil Contamination)**

- Following removal of the existing site improvements, the excavation, transport, and disposal of the contaminated soil materials on the Project site shall be performed in accordance with the specific recommended remedial alternative set forth in the Remedial Action Work Plan (RAW), subject to approval by DTSC. Implementation of the RAW shall proceed in accordance with all applicable local, state, and federal regulations. The Project Applicant shall comply with all conditions contained in the Draft RAW, as it may be subsequently amended or modified.

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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect may occur if the Project Site is located within 0.25-mile of an existing or proposed school site, and is projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds. The closest school site to the Project site is the proposed 532-student school to be developed as part of a retail and residential mixed-use project at 950 E. 3rd Street, approximately 0.5 mile northwest of the Project site. No hazardous materials other than modest amounts of paints, typical cleaning supplies, and solvents used for housekeeping and janitorial purposes would be present at the Project site, and the use of these substances would comply with State Health Codes and Regulations. Therefore, the Project would not create a significant hazard through hazardous emissions or the handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school and a less than significant impact would occur.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if the Project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

In meeting the provisions in Government Code Section 65962.5, commonly referred to as the “Cortese List,” database resources that provide information regarding identified facilities or sites include EnviroStor, GeoTracker, and other lists compiled by the California Environmental Protection Agency. According to EnviroStor, there are no cleanup sites, permitted sites, or other sites on or adjacent to the

Project Site.²² The nearest cleanup site to the Project is the active Butterfield/Sun Chemical Corporation site at 590 South Santa Fe Avenue, approximately 0.2 mile to the east.

According to GeoTracker, there are no LUST Cleanup Sites, Other Cleanup Sites, Land Disposal Sites, Military Sites, WDR (Waste Discharge Requirements) Sites, Permitted UST Facilities, Monitoring Wells, DTSC Cleanup Sites, or DTSC Hazardous Waste Permit sites on the Project Site.²³ Other than the Butterfield/Sun Chemical Corporation site, the only other listed site is a LUST Cleanup Site at 1451 E. 6th Street, approximately 0.15 mile southeast of the Project site. This site is listed as having a “completed – case closed” cleanup status.

The Project site has not been identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit.²⁴ There are no active Cease and Desist Orders or Cleanup and Abatement Orders from the California Water Resources Control Board associated with the Project site.²⁵ The Project site is not subject to corrective action pursuant to the Health and Safety Code, as it has not been identified as a hazardous waste facility.²⁶

Therefore, as the Project site is not located on a list of hazardous material sites and will not result in a significant hazard to the public or environment, no impact would occur.

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

No Impact. A significant project-related impact may occur if a project were placed within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard. The nearest airport to the Project site is the Santa Monica Airport, located approximately twelve miles west of the site. The El Monte Airport is next closest at roughly 13.7 miles from the Project site. Further, the Project site is not located within a public airport land use plan. Furthermore, the Project site is not in an

²² State of California Department of Toxic Substance Control, EnviroStor, website: <http://www.envirostor.dtsc.ca.gov/public/>, accessed March 2015.

²³ State of California Environmental Protection Agency, State Water Resources Control Board, Geotracker, website: <http://geotracker.waterboards.ca.gov/map/>, accessed March 2015.

²⁴ State of California Environmental Protection Agency, Cortese List Data Resources, Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, website: <http://www.calepa.ca.gov/SiteCleanup/CorteseList/CurrentList.pdf>, accessed March 2015.

²⁵ State of California Environmental Protection Agency, Cortese List Data Resources, List of “Active” CDO and CAO from Water Board, website: <http://www.calepa.ca.gov/SiteCleanup/CorteseList/default.htm>, accessed March 2015.

²⁶ State of California Environmental Protection Agency, Cortese List Data Resources, Cortese List: Section 65962.5(a), website: <http://www.calepa.ca.gov/SiteCleanup/CorteseList/SectionA.htm#Facilities>, accessed March 2015.

airport hazard area. Therefore, the Project would not result in a safety hazard for people residing or working in the Project area, and impacts would be less than significant.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. There are no private airstrips in the vicinity of the Project site, and as such, no impacts would occur.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact to hazards and hazardous materials if the project involved possible interference with an emergency response plan or emergency evacuation plan. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the degree to which the project may require a new, or interfere with an existing emergency response or evacuation plan, and the severity of the consequences.

The Project is not located near an area covered by an adopted local emergency response or evacuation plan, and although the site is located near the Los Angeles River, along which major power transmission lines run, the Project would have no effect on this important emergency corridor.²⁷ Development of the Project site may require temporary and/or partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Project would not cause permanent alterations to vehicular circulation routes and patterns, nor would it impede public access or travel upon public rights-of-way. As discussed below under Transportation and Traffic, the Project would not create significant impacts at any of the study intersections during the morning and afternoon peak hours. Therefore, the Project's impacts to area traffic would have no significant impacts on nearby roadways or intersections, and would not interfere with implementation of an emergency response or evacuation plan. Therefore, the Project's impacts related to interference with any adopted emergency response plan or emergency evacuation plan would be less than significant.

²⁷ *City of Los Angeles Safety Element Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, November 1996.*

h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. A significant impact may occur if a project is located in proximity to wildlands areas and would pose a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project site is located in a highly urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or significant vegetation. The Project site is not located in a Very High Fire Hazard Severity Zone, Mountain Fire District, or Fire Buffer Zone.²⁸ Therefore, no impacts from wildland fires would occur.

Cumulative Impacts: Hazards and Hazardous Materials

Less Than Significant Impact. Development of the proposed Project, in combination with the cumulative development projects, has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City of Los Angeles. However, the potential impacts associated with the proposed Project would be less than significant and, therefore, not cumulatively considerable. With respect to the cumulative development projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of those properties. The closest cumulative project is located at 520 Mateo Street, approximately one block from the Project site, and is not sufficiently close enough to the Project site to generate cumulative impacts with respect to hazardous materials given that this project is a residential/retail mixed-use development and would not be anticipated to involve the regular usage of significant quantities of hazardous substances. Further, local municipalities are required to follow local, state, and federal laws regarding hazardous materials, which would further reduce impacts associated with cumulative projects. Therefore, with compliance with local, state and federal laws pertaining to hazardous materials, the Project, in conjunction with cumulative projects, would be expected to result in less than significant cumulative impacts with respect to hazardous materials.

9. HYDROLOGY AND WATER QUALITY

a) Would the project violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the

²⁸ City of Los Angeles Department of Planning, *Zone Information and Map Access System*, website: <http://zimas.lacity.org/>, accessed January, 2015.

applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if the project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

The City of Los Angeles has adopted the regulatory requirements set forth in the SUSMP of the Los Angeles Regional Water Quality Control Board (LARWQCB) under the City of Los Angeles Ordinance No. 173,494. Best management practices (BMPs) typically include controlling roadway and parking lot contaminants by installing oil and grease separators at storm drain inlets; cleaning parking lots on a regular basis; incorporating peak-flow reduction and infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping; and implementing education programs.

The SUSMP identifies the types and sizes of private development projects that are subject to its requirements. As the Project proposes a commercial development containing one acre or more of impervious surface area, it is subject to the requirements of the SUSMP. Requirements of the SUSMP are enforced through the City's plan approval and permit process.

Construction

Three general sources of potential short-term, construction-related stormwater pollution associated with the Project include: 1) the handling, storage, and disposal of construction materials containing pollutants, including soil and soil contaminants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment. As required under the National Pollution Discharge Elimination System (NPDES), the Project Applicant is responsible for preparing a Storm Water Pollution Prevention Plan (SWPPP) to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. The primary objectives of the NPDES stormwater program requirements are to: 1) effectively prohibit non-stormwater discharges, and 2) reduce the discharge of pollutants from stormwater conveyance systems to the Maximum Extent Practicable ("MEP" statutory standard). The SWPPP would incorporate the required implementation of BMPs for erosion control and other measures to meet the NPDES requirements for stormwater quality. Implementation of the BMPs identified in the SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality.

Further, the Applicant would be required to obtain coverage under the General Construction Activity Storm Water Permit (GCASP), which requires development and implementation of a Storm Water

Pollution Prevention Plan (SWPPP).²⁹ In addition, construction projects that include grading activities during the rainy season must also develop a Wet Weather Erosion Control Plan (WWECP). The Project will comply with LAMC Chapter IX, Division 70, which addresses grading, excavations, and fills. Compliance with the LAMC would ensure that construction would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. Therefore, construction impacts related to water quality would be less than significant.

Operation

Stormwater runoff from the Project site currently flows into the adjacent streets. A County storm drain is located in Mateo Street north of Palmetto Street and in Palmetto Street east of Mateo Street. A City storm drain is located in Palmetto Street beginning adjacent to the northwest corner of the Project site. Once in the adjacent street gutters (Palmetto Street adjacent to the Project site does not have curb gutters but features a gutter down the middle of the street), runoff in both Mateo Street and Palmetto Street flows to storm drain catch basins located within the blocks adjacent to the site. Since the Project site is currently comprised of nearly 100 percent impervious surfaces, no additional stormwater runoff is anticipated as a result of Project development. Additionally, irrigation and other runoffs from the Project are anticipated to be minimal. Based on the availability of nearby storm drains and no increase in runoff from the Project site (beyond that produced by the existing developed condition), Project impacts with respect to the volume of stormwater runoff would be less than significant.

In addition, potential impacts to surface water quality from runoff would be mitigated to a less than significant level by incorporating stormwater pollution control measures. The Project will be required to demonstrate compliance with Low Impact Development Ordinance (“LID Ordinance”) standards and retain or treat the first ¾ inch of rainfall in a 24-hour period. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project site as compared to the current conditions. City of Los Angeles Ordinance No. 172,176 and Ordinance No. 173,494 specify Stormwater and Urban Runoff Pollution Control, which require the application of BMPs. Chapter IX, Division 70 of the LAMC addresses grading, excavations, and fills. The Project would also comply with water quality standards and wastewater discharge requirements set forth by the SUSMP for Los Angeles County and Cities in Los Angeles County and approved by the Los Angeles Regional Water Quality Control Board (LARWQCB). Full compliance with the SUSMP and implementation of design-related BMPs would ensure that the operation of the Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Therefore, operational water quality impacts would be less than significant.

²⁹ California Environmental Protection Agency, State Water Resources Control Board, Storm Water Program, Construction Storm Water Program, website: http://www.swrcb.ca.gov/water_issues/programs/stormwater/construction.shtml, accessed January 2015.

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on groundwater level if it would change potable water levels sufficiently to: (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity. As discussed in Section 8(a), the Project site is 100 percent impervious. As such, 100 percent of the surface water runoff from the Project site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project site.

According to the Geotechnical Study (see Appendix C), groundwater was not encountered to a depth of 50.5 feet below ground surface at the Project site. Review of the Seismic Hazard Zone Report for the Los Angeles Quadrangle indicates that the historical high groundwater level is greater than 100 feet below ground surface in the vicinity of the site. The Project would excavate soils beneath the Project site for subgrade preparation to a depth of approximately 20 feet, and would thus not impact the groundwater table. Thus, construction of the Project would not deplete groundwater supplies nor interfere substantially with groundwater recharge and no impact would occur.

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, in a manner which would result in substantial erosion or siltation on- or off-site?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow that would result in a substantial increase in erosion or siltation during construction or operation of the project. The Project site is located in a highly urbanized area of Los Angeles, and no streams or river courses are located on or within the immediate Project vicinity.

Implementation of the Project would not increase site runoff or result any changes in the local drainage patterns, as the site is currently 100 percent impervious. Implementation of the SWPPP and LID requirements, however, would reduce the amount of surface water runoff after storm events, as the Project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing $\frac{3}{4}$ inch of rainfall in a 24-hour period. Therefore, the Project would not result in any impact associated with surface water hydrology, erosion, or siltation on- or off-site.

d) 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact if it results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the project site or nearby properties. The Project site is located in a highly urbanized area of Los Angeles, and no streams or watercourses are located on or within the immediate Project vicinity. The Project site is 100 percent impervious. The Project would not result in a significant increase in site runoff or any changes in the local drainage patterns. Therefore, the Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site and no impact would occur.

e) Would the project 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?

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

There is a 24-inch City storm drain within Palmetto Street, beginning near the Project site's northwest corner. There is a 90-inch County storm drain within Mateo Street north of Palmetto Street, which curves east under Palmetto Street. Multiple catch basins allowing stormwater to enter each of these drainage facilities are located near the Project site. Urban runoff discharged from municipal storm drains is one of the principal causes of water quality problems in most urban areas. Oil and grease from parking lots, pesticides, cleaning solvents, and other toxic chemicals can contaminate stormwater, which can then contaminate receiving waters downstream and, eventually, the Pacific Ocean. As discussed in the response to Question 9(a), the Project is required to comply with the NPDES program as well as the requirements set forth in the LAMC. These regulations control water pollution by regulating point sources that discharge pollutants, and are further described under *Construction and Operation*, below.

Construction

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

Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. The same types of common sense, “good housekeeping” procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes. Poorly maintained vehicles and heavy equipment leaking fuel, oil, or other fluids onto the construction site are also common sources of stormwater pollution and soil contamination. Earth-moving activities that can greatly increase erosion processes are another source of stormwater contamination. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants.

When properly designed and implemented, these “good-housekeeping” practices would further reduce the already less than significant short-term construction-related impacts by controlling dust and erosion that may occur on-site and leaks from any construction equipment. Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permit requirements.

Because sediment carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life, the Project would be required to implement the following measures during construction activities, in accordance with the NPDES construction site stormwater management permit:

- Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains;
- All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills;
- Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible; and
- Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting.

Prior to the issuance of a grading permit, the Project would be required to comply with the Standard Urban Stormwater Mitigation Plan (SUSMP) and/or the Site Specific Mitigation Plan to mitigate stormwater pollution as required by Ordinance Nos. 172,176 and 173,494. The appropriate design and application of Best Management Practice (BMP) devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works.

Through compliance with these requirements, the Project's impacts with respect to construction stormwater pollution would be less than significant.

Operation

Post-development runoff from the Project site would be collected and directed toward existing storm drains in the Project vicinity that have adequate capacity. Activities associated with operation of the Project would generate substances that could degrade the quality of water runoff. The deposit of certain chemicals by cars parked in the Project's parking structure could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system.

However, pursuant to local practice and City policy, stormwater retention will be required as part of the LID Ordinance/SUSMP implementation features (despite no increased imperviousness at the Project site). Further, the generation of pollutants from the parking structure would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance requirements. Accordingly, the Project will be required to demonstrate compliance with LID Ordinance standards and retain or treat the first ¾ inch of rainfall in a 24-hour period, which will reduce the Project's impact to the stormwater infrastructure. Therefore, the Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff and potential impacts to surface water quality would be less than significant.

f) Would the project otherwise substantially degrade water quality?

Less Than Significant Impact. A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. Other than the sources described in the response to Question 9(e), the Project does not include other sources of contaminants that could substantially degrade water quality. Further, the Project would comply with all federal, state and local regulations governing stormwater discharge. Therefore, impacts to water quality would be less than significant.

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. A significant impact may occur if the Project were to place housing within a 100-year flood

hazard area. A 100-year flood is defined as a flood that results from a severe rainstorm with a probability of occurring approximately once every 100 years. According to the Federal Emergency Management Agency (FEMA) flood insurance rate map for the Project area, the Project site is not located within a designated flood zone. Therefore, the Project would not place housing within a 100-year flood hazard area and no impact would occur.

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. A significant impact may occur if the Project was located within a 100-year flood zone, which would impede or redirect flood flows. The Project site is not in an area designated as a 100-year flood hazard area. The Project site is located in a highly urbanized area and, as no changes to the local drainage pattern would occur with implementation of the Project, the Project would not have the potential to impede or redirect floodwater flows and no impact would occur.

i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. A significant impact may occur if the Project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam. Based on a review of the County of Los Angeles Flood and Inundation Hazards Map, it is concluded that the Project site does not lie within a mapped inundation area.³⁰ The Project site is located approximately 600 feet west of the Los Angeles River, which is contained in a flood control channel. The Project site is within the City-designated potential inundation area of Los Angeles River flood control channel, as is much of Downtown and Central Los Angeles.³¹ The Project site and the surrounding areas could be inundated with floodwaters if the levees along the Los Angeles River channel were to fail, which is a remote possibility. The Los Angeles River flood control channel is maintained by the U.S. Army Corps of Engineers (USACE), which is responsible for periodically analyzing its facilities for earthquake safety and potential failures. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing channel and drainage infrastructure are intended to ensure that all such facilities are capable of withstanding the maximum credible earthquake for the site. Flooding from other sources is not expected; thus the minimal risk of flooding from potential levee failure would not be exacerbated by the development of the Project. Thus, the failure of the Los Angeles River flood control channel is considered remote and does not present a significant risk of loss, injury or death to people or structures. Moreover, the area surrounding the Project site is highly urbanized and there are no other levees or dams

³⁰ Los Angeles County Department of Public Works, FEMA Flood Zone Determination Website <http://dpw.lacounty.gov/wmd/floodzone/>, accessed January 2015.

³¹ City of Los Angeles, Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles: <http://cityplanning.lacity.org/cwd/gnlpln/safetyelt.pdf>, accessed May 10, 2015.

within the immediate vicinity of the Project site. Thus, the Project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam and no impact would occur.

j) Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

No Impact. A significant impact would occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically induced tidal phenomena (i.e., seiche and tsunami), or if a project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. Seiches are large waves generated in very large enclosed bodies of water or partially enclosed arms of the sea in response to ground shaking. Tsunamis are waves generated in large bodies of water by fault displacement or major ground movement. Based on the lack of such large enclosed water bodies nearby, the Project site is not located in a potential seiche or tsunami zone and no impacts would occur. With respect to the potential impact from a mudflow, the Project site and surrounding area are relatively flat and the site is surrounded by urban development; therefore, it does not contain any sources of mudflow. Additionally, there are no major hills or steep slopes in the Project vicinity. Therefore, the Project would not expose people or structures to significant risk involving seiche, tsunami, or mudflow, and no impact would occur.

Cumulative Impacts: Hydrology and Water Quality

Less Than Significant Impact. Development of the Project in combination with the cumulative development projects would result in the further infilling of uses in an already dense urbanized area. As discussed above, the Project site and the surrounding areas are served by the existing City and County storm drain systems. Runoff from the development site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the cumulative development projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the cumulative development sites, since this part of the City is already fully developed with impervious surfaces.

Each cumulative development project would be required to implement a SWPPP. Under the requirements of the LID Ordinance, each project will be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing $\frac{3}{4}$ inch of rainfall in a 24-hour period. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Project would not make a cumulative contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. Therefore, cumulative water quality impacts would be less than significant.

10. LAND USE AND PLANNING

a) Would the project physically divide an established community?

No Impact. A significant impact may occur if a project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (b) the extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and (c) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of a project.

The Project site is located within an urbanized area within the Central City North Community Plan Area. The Project site is located within a predominately industrial zone. It is currently zoned M3-1-RIO and has a land use designation of Heavy Industrial in the Community Plan. However, the Project is located within the existing Artists-in-Residence District (Arts District). As described in the Community Plan, the Arts District is primarily made up of old warehouses that have been converted to artist's lofts and studios. As a result, there are several residentially developed properties within the larger vicinity of the Project site. As a commercial retail and office development, the Project is consistent with the existing M3 zoning designation. The Project site has been fully developed with light industrial uses for decades. Given these facts, it is concluded that the Project would not divide an established community as the existing pattern of development in the Project area includes commercial, industrial, manufacturing, and residential land uses and no impact would occur.

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the project site, and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate.

The Project site is located within the jurisdiction of the City of Los Angeles, and is therefore subject to the designations and regulations of several local and regional land use and zoning plans. At the regional level, the Project site is located within the planning area of the Southern California Association of Governments (SCAG), the Southern California region's federally designated metropolitan planning organization. The Project is also located within the South Coast Air Basin and, therefore, is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). At the local level, the General Plan of the City of Los Angeles, the Central City North Community Plan, the Central Industrial

Redevelopment Plan, and the LAMC, which are intended to guide local land use decisions and development patterns, guides development of the Project site.

Regional Plans

SCAQMD Air Quality Management Plan. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The SCAQMD's Air Quality Management Plan (AQMP) was updated in 2012 to establish a comprehensive air pollution control program leading to the attainment of state and federal air quality standards in the Basin, which is a non-attainment area. As discussed in Section 3, Air Quality, above, with the implementation of mitigation measures, the Project would not exceed the SCAQMD's daily pollutant emission significance thresholds during the construction or operational phases of the Project. Therefore, the Project would be consistent with the AQMP.

SCAG Regional Comprehensive Plan. The Project site is located within the six-county region that comprises the SCAG planning area. The SCAG Regional Comprehensive Plan (RCP) includes growth management policies that strive to improve the standard of living, maintain the regional quality of life, and provide social, political, and cultural equity. The Project would be consistent with policies set forth in the RCP, as the Project would redevelop a site that is currently occupied by underutilized warehouse buildings with a pedestrian-oriented retail shop and creative office complex, including restaurants, thereby maximizing a property that is easily accessible to local residents and that is least likely to cause an adverse environmental impact. Furthermore, the Project would have no effect with respect to SCAG growth projections as it would not add new residents to the site.

Local Plans

City of Los Angeles General Plan. The General Plan is a comprehensive, long-range declaration of purposes, policies and programs for the development of the City. The General Plan is a dynamic document consisting of 11 elements, 10 Citywide elements (Air Quality Element, Conservation Element, Historic Preservation and Cultural Resources Element, Housing Element, Infrastructure Systems Element, Noise Element, Open Space Element, Public Facilities and Services Element, Safety Element, and Transportation Element) and the Land Use Element, which provides individual plans for each of the City's 35 Community Planning Areas. Those elements that would be most applicable to the Proposed Project are the Transportation Element and the Land Use Element.

Transportation Element

The Transportation Element recognizes that primary emphasis must be placed on maximizing the efficiency of existing and proposed transportation infrastructure through advanced transportation technology, through reduction of vehicle trips, and through focusing growth in proximity to public transit. The Project's location is well-positioned to address vehicle miles traveled as it affords residents and

workers in the Arts District the ability to minimize the use of personal vehicles by having easy access to a wide variety of retail shops, restaurants and cafés, as well as leasable creative office space, in their own community and not having to drive to similar commercial and office options at a greater distance. The Transportation Element sets forth goals, objectives and policies to establish a citywide strategy to achieve long-term mobility and accessibility within the City of Los Angeles.

Transportation Element Objective 2 strives to mitigate the impacts of traffic growth, reduce congestion, and improve air quality by implementing a comprehensive program of multimodal strategies that encompass physical and operational improvements as well as demand management. The Project site's location in the Arts District would allow local residents and workers the opportunity to have easy access to a wide variety of retail shops, restaurants and cafés, thereby addressing the impacts of traffic growth, congestion and air quality issues. Area residents and workers would be able to reduce their total vehicle miles traveled by shopping and dining at a local destination, and some could reduce their commute distance by leasing office space in the project.

Impacts of traffic growth may also be mitigated by the Project site's proximity to the MTA's express bus system, known as Metro Rapid Bus. The most convenient Metro Rapid stop to the project site is on Metro Rapid Bus Line 720 approximately one-fifth of a mile southwest of the Project site (near 6th Street and Central Avenue). Line 720 runs east-west along 5th and 6th Streets in the vicinity of Central Avenue, continuing to the west along Wilshire Boulevard to its final destination in Santa Monica. Going east along 6th Street, Metro Rapid Bus 720 continues to run along Whittier Boulevard through East Los Angeles to the Commerce Center. Metro Local Bus Line 18, which runs east-west along 6th Street, has a stop located on 6th Street at Mateo Street, approximately 60 feet south of the Project site. Metro Local Line 18 continues to the west through Downtown Los Angeles and then along Wilshire Boulevard to its final destination at Western Avenue in the Wilshire District. Going east along 6th Street, Metro Local Line 18 continues to run along Whittier Boulevard through East Los Angeles and eastward to the Metrolink station in Montebello. Lastly, DASH Bus Line A also offers convenient access to the Civic Center, the City West area along Wilshire Boulevard, and the 7th Street/Metro Center and Civic Center rail stations and has a stop approximately one-fifth of a mile to the north of the Project site (near Traction Avenue and Merrick Street).

The Metro Gold Line rail system is accessed at the Little Tokyo/Arts District station at 1st Street and Alameda Street, approximately 0.8 mile northwest of the Project site. The Metro Gold Line offers service to East Los Angeles to the east and Pasadena to the northeast. The Metro Gold Line connects to Union Station, providing access to Metrolink, the Metro Silver Bus Line, and Metro Rail Red and Purple Lines. The availability of transit options to access the Project may help to reduce traffic congestion and improve air quality. The MTA is evaluating building Metro Rail stations at 1st and 6th streets alongside existing track that could serve the Arts District.

Transportation Element Objective 3 strives to support development in regional centers, community centers, major economic activity areas, and along mixed-use boulevards as designated in the Community

Plans. The Project would promote consistency with this objective by allowing for the development of a commercial project in an area where local residents and workers would support the development of an economic activity area. The Arts District is not identified as a regional or community center, but it is becoming an economic activity area for the increasing number of persons drawn to the emerging environment of a self-contained community of artists and professionals, most of whom either establish home-based occupations or commute to jobs in the downtown area, preferring to avoid commutes from suburban areas while enjoying the urban lifestyle. This urban lifestyle choice would be enhanced by the presence of many retail shops, restaurants and cafés that are designed to cater to those living and working in the Arts District.

For these reasons outlined above, the Proposed Project demonstrates consistency with the Transportation Element of the General Plan.

Land Use Element

The Project site is located within the Central City North Community Plan area. Therefore, all development activity on-site is subject to the land use regulations of the Central City North Community Plan (Community Plan). The Community Plan goals and objectives include: preserving and enhancing the positive characteristics of existing residential neighborhoods while providing a variety of housing opportunities with compatible new housing; improving the function, design, and economic vitality of the commercial corridors, preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks, and appearance; maximizing the development opportunities of future transit systems while minimizing any adverse impacts; and planning the remaining commercial and industrial development opportunity sites for needed job producing uses that will improve the economic and physical condition of the Central City North area.

As described in the Community Plan, the Arts District includes a number of former warehouses that have been converted to artists' lofts and studios. The Community Plan encourages the continued and expanded development of a thriving Arts District community in the plan and proposed redevelopment areas.³² The Project, which would provide creative office space, retail shops and services, as well as restaurant/dining options to the local community, would conform to the goals, objectives, and land uses identified in the Community Plan and would be designed to serve the current land use pattern of expanding residential uses within the Arts District.

³² City of Los Angeles Department of City Planning, *Central City North Community Plan*, website: <http://cityplanning.lacity.org/complan/pdf/ccncptxt.pdf>, accessed December 2014.

LAMC and Community Plan Land Use Designation

Existing

The Project site is located within the Central City North Community Plan Area of the City of Los Angeles and within the Central Industrial Redevelopment Plan Area. The Project is also within the East Los Angeles State Enterprise Zone.³³ The Project site is currently zoned M3-1-RIO (Heavy Industrial, Height District 1) with a General Plan land use designation of Heavy Industrial. Pursuant to Section 12.20 of the Los Angeles Municipal Code (LAMC), the following uses are permitted in the M3-1-RIO zone: various industrial, manufacturing, commercial, and office uses. The -1 designation indicates that the Project site is located in Height District 1, which does not specify a building height limit, but rather limits floor area ratio ("FAR") on the Project Site to 1.5:1. The subject property is located within the Central Industrial Redevelopment Project Area, which designates the subject site as Light Industrial. The site is located in the Los Angeles River Improvement Overlay (RIO) District, effective August 20, 2014, pursuant to Ordinances 183,144 and 183,145.

Floor Area

As noted above, the Project Site's M3-1-RIO designation indicates that the Project site is located in Height District 1, which does not specify a building height limit, and limits floor area ratio ("FAR") on the Project Site to 1.5:1. The Project proposes 170,906 square feet of development, which is an FAR of 1.1:1, or less than is currently allowed at the site under existing zoning.

Open Space

There is no requirement for open space applicable to the Proposed Project. Nevertheless, the Project would include approximately 15,000 square feet of open space on-site, largely in the form of pedestrian paseos, landscaping, and outdoor seating and dining areas.

Parking

Vehicular access to the Proposed Project would be provided via a driveway leading into the parking structure (Project Building 4) from Palmetto Street at the northwest corner of the Project site. The parking structure would be accessible to Project patrons via elevators located on the paseo. Other pedestrian access to the Project would be from the paseos along Mateo Street and Palmetto Street, including the corner plaza entry at the intersection of Mateo and Palmetto Streets.

³³ City of Los Angeles Department of City Planning, Zoning Information and Map Access System, website: <http://zimas.lacity.org/>.

The Parking Exception in LAMC Section 12.21A4(x)(3)(6) permits two parking spaces per every 1,000 square feet of combined retail, office, and restaurant/café uses on any lot in any Enterprise Zone. This generates a parking requirement of 342 parking spaces to accommodate 170,906 square feet of floor area for the Project's proposed commercial uses of retail, restaurants and cafés. Pursuant to LAMC Section 12.21A16, the Project is required to provide 67 short-term bicycle parking spaces and 72 long-term bicycle parking spaces. As proposed, the Project would provide 540 automobile parking spaces (or 198 more than required by the LAMC), as well as 69 short-term bicycle parking spaces and 76 long-term bicycle parking spaces (or two more short-term and four more long-term spaces than required by the LAMC).

RIO District

The River Improvement Overlay (RIO) District 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. Specifically, the RIO was established under the Los Angeles River Revitalization Master Plan that was adopted in May 2007, which establishes a vision for the 32 miles of the Los Angeles River that are within the City's boundaries. The standards of the RIO affect projects that involve the redevelopment or major remodeling involving more than 50 percent of the existing building's value. Because the proposed Project involves the redevelopment of the site, it will need to obtain administrative clearance from the Department of City Planning illustrating compliance with the RIO landscaping and design standards. As currently proposed, the landscaping proposed for the Project would comply with the design standards identified in the RIO.

Other Applicable Policies

The Project site is located in the Arts District, as identified in the Central City North Community Plan. Updated in December 2000, the Community Plan describes the Arts District as bounded by 1st Street to the north, the Los Angeles River to the east, 6th Street to the south, and Alameda Street to the west. This area has experienced substantial residential and commercial growth in the past decade. Residential and mixed-use projects that have been approved and/or developed in the vicinity of the Project site include the One Santa Fe project, located on the east side of Santa Fe Avenue across from SCI-Arc; the Molino Lofts; the Barker Block Lofts; Toy Factory Lofts; 2121 Lofts; the Factory Place Arts Complex; and the Biscuit Company Lofts. Well-known restaurants and drinking establishments, such as Wurstkuche, Americano, Church & State, Blue Bottle Coffee, Villains Tavern, Poketo, Tony's Saloon, and Angel City Brewery are located in the Arts District along with a variety of eclectic shops and galleries.

On March 5, 2008, the City Council, via Council Motion, approved updating and expanding the geographical boundaries of the Arts District in the Central City North Community Plan to include the areas south of 6th Street, including Violet Street and the areas between Mill Street and Wilson Street to the west and the Los Angeles River to the east. The Arts District expansion was in response to the significant growth in mixed-use residential and commercial development south of 6th Street in recent years. The

Factory Place Arts Complex, located on the north side of 6th Street and in close proximity to the Project site, includes 188 residential loft units, with ground floor retail and commercial uses and a 9,000-square foot event space. The area south of 6th Street to the east of Alameda Street includes other residential developments, including 2121 Lofts located at Santa Fe Avenue and 7th Place, and the Biscuit Company Lofts and Toy Factory Lofts located on Industrial Street.

The site is surrounded by M3-1-RIO zoned properties to the north, south, east and west. The surrounding properties include a mix of industrial, commercial, mixed-use, and residential projects. The Barker Block Lofts and Molino Lofts are adaptive reuse projects located across Palmetto Street to the north of the Project site. These lofts include joint live/work units and commercial space. To the south, along the north side of 6th Street and to the west of Mateo Street, the Factory Place Arts Complex includes ground floor retail and commercial uses along with residential lofts. The Los Angeles Gun Club is located on the north side of 6th Street southwest of the Project site. To the south of 6th Street and across Mateo Street to the east of the site are numerous markets, cafés, restaurants and other amenities easily accessible to persons working and living in the surrounding neighborhood. Warehouse buildings are located immediately to the south and west of the site. In general, the Proposed Project area is characterized by dense downtown contextual development consisting of a mixture of some multi-family housing along with predominately commercial and various industrial uses, as well as retail uses.

The Project is designed to be compatible with the existing and future development of neighboring properties, and to be consistent with the City's vision of the Arts District in the Central City North Community Plan. The Arts District is described in the Community Plan as "primarily made up of old warehouses now converted to artists lofts and studios." In recent years, former industrial and warehouse buildings, adjacent to the Project site, have been restored and converted to residential uses and joint live/work quarters. The Project would be designed for compatibility with these converted industrial and warehouse buildings. The Project's proposed architectural style reflects the industrial quality of the immediate neighborhood. The Project would create a development that is consistent in both design and land use with other existing development in the Central City North area. The Project would be compatible with and complementary to the surrounding area because it would consist of retail, creative office, and restaurant uses capable of serving the growing residential population of the area. The Project would also contribute to the ongoing revitalization of the area by replacing underutilized warehouse buildings with a pedestrian-oriented retail complex within a series of buildings linked by paseos and designed to be visually complementary with neighboring industrial architecture within the site's vicinity.

Industrial Land Use Policies

The Project site is located in the Industrial Mixed Use (IMU) District. The Industrial Mixed Use District is defined as an area that should remain predominantly industrial/employment districts, but which may support a limited amount of residential uses. According to the December 2007 Industrial Land Use Policy (ILUP) Geographically Specific Directions, the IMU is further divided into two Alameda Industrial Areas, Analysis Area 3 and Analysis Area 4. The Project site is located in Alameda Analysis

Area 3, which is bounded by 1st Street to the north between Santa Fe Avenue and the Los Angeles River, 3rd Street to the north between Alameda Street and the Los Angeles River, and 6th Street to the south. The Project site is designated as industrial land with a survey land use of storage. In 2006, 43 percent of the existing land use within Analysis Area 3 was light industrial.

The 2007 ILUP study also provided specific directions to Planning Department staff. Preliminary recommendations for Alameda Analysis Area 3 were provided as follows:

- Preserve industrial zoning consistent with Central City North Community Plan; allow industrial, neighborhood serving commercial, and neighborhood-scale professional service/office uses.
- Maintain and strengthen Artist in Residence District as established in the Community Plan; continue to allow live/work uses and adaptive reuse of existing buildings.
- Allow new residential construction only when it is consistent with and supports the intent of the Artists-in-Residence District, with a requirement for affordable artist housing and other community benefits.
- Support pedestrian linkages to the Los Angeles River through design and infrastructure improvements as identified in the Los Angeles River Revitalization Master Plan (LARRMP), prioritizing 1st and 4th Streets.

The Proposed Project, which would provide neighborhood-serving retail, restaurant and office uses, is consistent and compatible with the recommendations that were provided for Alameda Analysis Area 3 in the City's ILUP study. The Project proposes the redevelopment of existing underutilized industrial land for commercial job creating uses that benefit the Arts District, and as such, does not reduce the integrity and viability of the existing industrial area. The Project proposes to maintain the industrial character of the area through compatible architectural design. The Community Plan, in defining the boundaries of the Arts District to include the Project site, has recognized that the area is "primarily made up of old warehouses now converted to artists' lofts and studios" and that the Community Plan "encourages the continued and expanded development of a thriving artists-in-residence community in the plan and proposed redevelopment areas."³⁴

Urban Design Guidelines and Walkability

The Project site is located in an urbanized and fully developed portion of the City. The built environment is characterized by a variety of architectural styles, age of buildings, type of development, and size. Building designs include mid-century modern, current modern, industrial or industrial warehouse, and historic. Uses include residential, retail, commercial, industrial and public uses, office, cultural and recreation. The Project would comply with the goals and design principles of the Central City North

³⁴ Central City North Community Plan, City of Los Angeles, page I-3.

Community Plan (Community Plan). The Community Plan describes the standards that need to be met for site planning, setbacks, scale, massing, architectural design (materials, windows, glare, and lighting) and other characteristics.

The development of this commercial/office Project would provide attractive amenities for nearby residents and would thus help to achieve a better transition between commercial and residential uses than now exists. Because residents of these developments will be drawn to the commercial uses, including restaurants and retail shops, to be offered by the Project, pedestrian activity is likely to increase, as residents would be drawn to the Project's pedestrian-friendly environment, thus creating a more adequate transition between commercial and residential uses. While projects in the industrial zone are not required to provide landscaping, the Project would be developed with open-to-the-sky paseos that would include trees, planters, and landscaping to create an inviting pedestrian experience. The Project proposes an industrial architectural character and scale that is compatible with and reflects the character of the existing neighboring brick warehouse buildings, some of which have been converted to live/work units.

The Project seeks to create a pedestrian friendly shopping environment with its ground floor retail space oriented either to the street frontages on Palmetto and Mateo Streets or to the paseos that traverse the Project site. The paseos are intended to create an inviting pedestrian environment by incorporating trees, seating areas and benches, and attractive landscaping in various styles of planters. The majority of retail and restaurant frontage in the Project would be provided at ground level. Even the second level restaurant space would be oriented to the street and the paseo. The Arts District, by virtue of its proximity to the central business district, draws many workers from downtown that come to enjoy restaurants, cafés, and bars in the community. The Project site's proximity to downtown would likely also draw visitors from the large daytime population of those working in the central city to enjoy the new shopping and dining amenities to be provided by the Project. The Arts District is an appealing location for new businesses that are developed in projects that respect the architectural integrity of the industrial character of the neighborhood. The Project would be designed with a high level of quality and distinctive character that is compatible with the existing industrial and commercial uses. The Project would be designed with brick facades that complement the existing brick warehouse buildings located across from the Project site on Palmetto Street and Mateo Street, as is shown in Figures II-9 through II-13. The design of the Project would thus be compatible with the neighboring existing uses.

The Project has been designed to enhance the existing pedestrian activity along Palmetto Street and Mateo Street, with the addition of new commercial uses fronting on these streets. Moreover, the design of the Project seeks to maximize pedestrian activity by creating open-to-the-sky paseos that traverse the project site, inviting more pedestrian activity on the site as well as on the adjacent streets. Additionally, the paseo would connect, through an easement, to an entrance at the rear of the property located on Factory Place, thereby allowing pedestrian access from areas to the west of the Project site. As has been discussed, the Arts District is evolving into a dynamic mixed-use area with numerous restaurants, cafés, taverns, gallery spaces, studios, breweries, and boutique retail shops. Increasingly, patrons walk to different venues and uses in the Arts District. Development of the Project would further enhance the

pedestrian connections in the area and the public realm along Palmetto Street and Mateo Street and would connect to the many mixed-use residential and commercial developments located within the surrounding community, including the Barker Block Lofts, Molino Lofts, Factory Place Arts Complex, Biscuit Company Lofts, Mill Street Lofts, 2121 Lofts, and Toy Factory Lofts.

Policies in the Community Plan promote the concept that “any proposed development be designed to enhance and be compatible with adjacent development.” The Project would be designed with an architectural style complementary to the industrial character of the neighborhood. Street frontages of the Project would have brick façades in order to complement the neighboring industrial buildings, some of which have been converted to joint live/work units. Chapter V of the Community Plan, Urban Design, has established design guidelines to define the minimum level of design that shall be observed in multiple residential, commercial, and industrial projects within the entire Plan area. With respect to site planning of commercial projects, the policies in the Community Plan design guidelines state that structures shall be oriented toward the main commercial street where a parcel is located and shall avoid pedestrian/vehicular conflicts by:

- Maximizing retail and commercial service uses along frontages of commercial developments
- Providing front pedestrian entrances for businesses fronting on main commercial streets
- Providing through arcades from the front of buildings to rear parking for projects with wide frontages

The Project complies with these guidelines by maximizing its retail uses along the street frontages of Palmetto Street and Mateo Street. The 3.55-acre project site allows the development to achieve a significant presence on both streets, with an approximate street frontage of 341 lineal feet on Palmetto Street and an approximate street frontage of 568 lineal feet on Mateo Street. The street frontage is also maximized by the Project occupying the intersection of both streets. The majority of the commercial businesses within the Project would front on these main commercial streets and on the paseos, thereby providing front pedestrian entrances for most businesses. In addition, the paseo would provide a through arcade from the intersection of Palmetto and Mateo Streets, crossing the Project site diagonally in order to access the parking structure at the rear as well as the pedestrian entrance connecting to Factory Place. The elevators and stairways located along the paseo would provide the only direct pedestrian access to the parking structure.

For the reasons outlined above, the Project’s impacts with respect to consistency with adopted land use plans would be less than significant.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. A project-related significant adverse effect could occur if the Project site was located within an area governed by a habitat conservation plan or natural community conservation plan. As discussed in

Section 4(f) above, no such plans presently exist which govern any portion of the Project site. Further, the Project site is located in an area that is already fully developed with commercial and industrial uses and is also within a heavily urbanized area of the City of Los Angeles. Therefore, the Project would not have the potential to cause such effects.

Cumulative Impacts: Land Use and Planning

No Impact. Development of the Project in conjunction with the cumulative development projects would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles.

In particular and with regard to land use plans, regional and citywide projects under consideration would implement and support important local and regional planning goals and policies. It is anticipated that any new projects would be subject to the project permit approval process and would incorporate any mitigation measures necessary to reduce potential land use impacts and that no significant impacts with regard to adopted land use plans would occur. Also, upon approval of the requested actions, development of the Project together with future forecasted growth would not be anticipated to substantially conflict with the intent of the City General Plan, with other applicable land use plans, or with the LAMC regarding the future development of the Central City North community. Therefore, development of the proposed Project together with the cumulative projects would not be expected to result in cumulatively considerable impacts with respect to applicable land use plans and regulations.

With regard to physical land use, it should be noted that all of the cumulative projects are subject to local zoning and land use designations for each of the project sites. These requirements would regulate future land uses and provide development standards for such land uses that would further preclude potential land use compatibility impacts.

As the proposed Project would not combine with the cumulative projects to substantially or adversely change the existing relationship with the local community and would not disrupt, divide, or isolate existing communities, the Project would not result in cumulatively considerable physical land use impacts.

11. MINERAL RESOURCES

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. A significant impact may occur if a project site is located in an area used or available for extraction of a regionally-important mineral resource, or if the project development would convert an existing or future regionally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important mineral resource

extraction. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering: (a) whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone MRZ-2 zone or other known or potential mineral resource area, and (b) whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

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

The Project site is located less than 1,000 feet southwest of the Union Station Oil Field. Although no oil wells exist or are known to have previously existed on or adjacent to the Project site, plugged wells do exist within a 1,500-foot radius of the Project site. The Project site is not located within an Oil Drilling/Surface Mining Supplemental Use District, or an Oil Field/Drilling Area.^{35,36}

Should any future mineral resource be discovered on or near the Project site, development of the Project would not preclude the mineral's extraction, nor would it alter the potential utility of any minerals located beneath the site. Therefore, no impact associated with the loss of availability of a known mineral resource would occur.

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. A significant impact may occur if a project is located in an area used or available for extraction of a regionally-important mineral resource, or if the development would convert an existing or future regionally-important mineral extraction use to another use, or if the development would affect access to a site used or potentially available for regionally-important mineral resource extraction. The

³⁵ City of Los Angeles Department of City Planning, *Environmental and Public Facilities Maps*, September 1996.

³⁶ State of California Department of Conservation, Division of Oil, Gas & Geothermal Resources, *Online Mapping System, District 1*, website: <http://www.conservation.ca.gov/dog/Pages/WellFinder.aspx>, accessed February 2015.

Project site is located within a Mineral Resource Zone 2 (MRZ-2) Area.³⁷ The Project site is not designated as a locally important mineral resource recovery site delineated on the Los Angeles General Plan, a specific plan, or other land use plan. Should any future mineral resource be discovered on or near the Project site, development of the Project would not preclude the mineral's extraction, nor would it alter the potential utility of any minerals located beneath the site. Therefore, no impact associated with the loss of availability of a locally important mineral resource recovery site would occur.

Cumulative Impacts: Mineral Resources

No Impact. As discussed above, the proposed Project would have no impact on mineral resources. It is not known if any of the cumulative development projects would result in the loss of availability of known mineral resources. Each of these projects would be required to comply with the Los Angeles CEQA guidelines and execute required project site studies. Nevertheless, the Proposed Project would have no incremental contribution to a potential cumulative impact on mineral resources and would thus have no cumulative impact on mineral resources.

12. NOISE

Noise Background

Characteristics of Sound

Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The "A-weighted scale," abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. Table IV-10 provides examples of A-weighted noise levels from common sources.

**Table IV-10
A-Weighted Decibel Scale**

Typical A-Weighted Sound Levels	Sound Level (dBA, L_{eq})
Threshold of Pain	140
Jet Takeoff at 100 Meters	125
Jackhammer at 15 Meters	95
Heavy Diesel Truck at 15 Meters	85

³⁷ City of Los Angeles Department of City Planning, *Environmental and Public Facilities Maps: Areas Containing Significant Mineral Deposits in the City of Los Angeles*, September 1996.

Conversation at 1 Meter	60
Soft Whisper at 2 Meters	35
Source: United States Occupational Safety & Health Administration, Noise and Hearing Conversation Technical Manual, 1999.	

Noise Definitions

This noise analysis discusses sound levels in terms of Community Noise Equivalent Level (CNEL) and Equivalent Noise Level (L_{eq}).

Community Noise Equivalent Level. CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale that accounts for noise source, distance, single event duration, single event occurrence, frequency, and time of day. Human reaction to sound between 7:00 p.m. and 10:00 p.m. is as if the sound were actually 5 dBA higher than if it occurred from 7:00 a.m. to 7:00 p.m. From 10:00 p.m. to 7:00 a.m., humans perceive sound as if it were 10 dBA higher due to the lower background level. Hence, the CNEL is obtained by adding an additional 5 dBA to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and 10 dBA to sound levels in the night from 10:00 p.m. to 7:00 a.m. Because CNEL accounts for human sensitivity to sound, the CNEL 24-hour figure is always a higher number than the actual 24-hour average.

Equivalent Noise Level. L_{eq} is the average noise level on an energy basis for any specific time period. The L_{eq} for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound. L_{eq} can be thought of as the level of a continuous noise that has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA.

Effects of Noise

The degree to which noise can impact the environment ranges from levels that interfere with speech and sleep to levels that cause adverse health effects. Human response to noise is subjective and can vary from person to person. Factors that influence individual response include the intensity, frequency, and pattern of noise, the amount of background noise present before the intruding noise, and the nature of work or human activity exposed to the source.

Audible Noise Changes

Small perceptible changes in sound level for a person with normal hearing sensitivity is approximately 3 dBA. A change of at least 5 dBA would be noticeable and could produce a community reaction. A 10 dBA increase is heard as a doubling in loudness and would produce a community response.

Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or “point source,” will decrease by approximately 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots or smooth bodies of water) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt, grass, or scattered bushes and trees) for each doubling of distance. For example, if a noise source produces a noise level of 89 dBA at a reference distance of 50 feet, the noise level would be 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of distance.

Noise is most audible when traveling by direct line-of-sight, a visual path between the noise source and noise receptor. Barriers, such as walls or buildings that break the line-of-sight between the source and the receiver, can greatly reduce noise levels from the source since sound can only reach the receiver by diffraction. Sound barriers can reduce sound levels by up to 20 dBA or more. However, if a barrier is not high or long enough to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced.

The California Department of Health Services has established guidelines for acceptable exterior noise levels for each county and city. These standards and criteria are incorporated into the land use planning process to reduce future noise and land use incompatibilities. Table IV-11 reflects state guidance that allows the City to ensure integrated planning for compatibility between land uses and outdoor noise.

Table IV-11
Land Use Compatibility for Community Noise Environments

Land Use Category	Community Noise Exposure (dBA, CNEL)					
	55	60	65	70	75	80
Residential - Low Density Single-Family, Duplex, Mobile Homes						
Residential - Multi-Family						
Transient Lodging – Motels, Hotels						
Schools, Libraries, Churches, Hospitals, Nursing						

Homes							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							
Playgrounds, Neighborhood Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Business Commercial and Professional							
Industrial, Manufacturing, Utilities, Agriculture							
 Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.							
 Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice.							
 Normally Unacceptable - New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.							

Clearly Unacceptable - New construction or development should generally not be undertaken.

Source: California Office of Noise Control, Department of Health Services.

State interior noise standards were established in 1974, when the California Commission on Housing and Community Development adopted noise insulation standards for residential buildings (Title 24, Part 2, California Code of Regulations). Title 24 establishes standards for interior room noise attributable to outside noise sources. Title 24 also specifies that acoustical studies should be prepared whenever a residential building or structure is proposed to be located in areas with exterior noise levels of 60 dB Day-Night Average Noise Level (L_{dn}) or greater. The acoustical analysis must show that the building has been designed to limit intruding noise to an interior level not exceeding 45 dB L_{dn} for any habitable room.

Applicable Regulations

The City of Los Angeles Municipal Code (LAMC) has established both construction and operation noise regulations. Between 7:00 a.m. and 10:00 p.m., powered equipment in or within 500 feet of a residential zone is prohibited if it exceeds the following maximum noise limits at a distance of 50 feet:

- 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;
- 75 dBA for powered equipment of 20 horse-power or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;
- 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools.³⁸

Additionally, according to the LAMC, a noise level increase of five decibels over the existing average ambient noise level at an adjacent property line is considered a noise violation. This standard applies to sources such as consumer electronics, HVAC systems, powered equipment intended for repeated use in residential areas and motor vehicles driven on-site. Section 41.40 of the LAMC also prohibits construction activity from occurring between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, and between 6 p.m. and 8 a.m. on Saturday.

³⁸ City of Los Angeles, *Municipal Code*, 1986.

- a) **Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the Project would generate excess noise that would cause the ambient noise environment at the Project site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). Implementation of the Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail below.

Construction Noise Impacts

During construction, ground clearing, grading, structural, and other noise-generating activities would occur at the Project site between the hours of 7:00 a.m. and 9:00 p.m. in accordance with the LAMC. Table IV-12 summarizes projected noise levels at nearby sensitive receptors during construction. Land uses on the properties surrounding the Project site include multi-family residential, commercial, and industrial facilities. For purposes of assessing noise impacts, the following nearby sensitive receptors to the Project site were identified:

- Willow Studios, a film set studio at 1333 Willow Street, 420 feet east of the Project site at the same elevation as the proposed Project.
- Molino Lofts, a multi-story apartment complex at 530 Molino Street, approximately 50 feet north of the Project site at the same elevation.
- Barker Block residences, a multi-story residential complex at 510 North Hewitt Street, approximately 50 feet northwest of the Project site at the same elevation.

To ascertain the ambient noise levels at these sensitive receptors, short-term, 15-minute noise readings were taken at five locations on December 8, 2014 using a Quest Technologies SoundPro DL Sound Level Meter.³⁹ Motor vehicles and heavy-duty trucks traveling on adjacent arterials, particularly Mateo Street and Palmetto Street, caused predominant noise. As shown in Table IV-12, ambient noise levels ranged from 62.5 dBA L_{eq} at the Molino Lofts apartments to 67.5 dBA L_{eq} at Willow Studios. The results of these noise readings are detailed in Appendix E to this IS/MND.

³⁹ SoundPro meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental noise measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground. Weather conditions were clear with negligible wind.

Construction activities would generate noise that would vary over the 18 months of activity on- and off-site, and would include use of on-site equipment such as scrapers, tractors, loaders and smaller equipment such as saws, hammers, and pneumatic tools. Audible increases in ambient noise of 5 dBA or more are projected at two of the three monitoring locations, specifically the two residential complexes directly north of the Project site. First, maximum noise levels of up to 79.2 dBA are projected at the Barker Block residences directly northwest of the Project site, an increase of 14.0 dBA. Second, 79.1 dBA are projected at the Molino Lofts residences in the future, an increase of up to 16.6 dBA. These construction-related noise impacts would exceed the 5 dBA increase considered noticeable and be considered significant but capable of being mitigated. The Project's construction noise impacts at the Molino and Barker Block Lofts would also exceed the State's Department of Health Services' guidelines for acceptable noise environments for multi-family residential land uses. The other sensitive receptor at the Willow Studios would not experience substantial increases in ambient noise levels.

**Table IV-12
Construction Noise Levels – Unmitigated**

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
Multi-Family Residences, 530 Molino St	50	79.0	62.5	79.1	16.6
Multi-Family Residences, 510 N. Hewitt St	50	79.0	65.2	79.2	14.0
Willow Studios, 1333 Willow St	420	57.5	67.5	67.9	0.4

Source: DKA Planning, 2015.

All Project construction noise impacts can be reduced below significance thresholds at the two impacted sensitive receptor locations. Use of sound muffling equipment on construction equipment would reduce ambient noise from construction equipment by 3 dBA at 50 feet of distance, producing minimal increases in ambient noise at the four nearby receptors. Erection of temporary construction walls along the Palmetto Street project site frontage will further reduce acute noise impacts on the residences by approximately 12 dBA. Implementation of Mitigation Measures 12-1 through 12-6 would address any audible increases in noise at these receptors and ensure local residents and employees are alerted to how any nuisance noise can be remedied.

With regard to off-site construction-related noise impacts, noise from haul trucks would be negligible, as grading activities are expected to be balanced, with equal amounts of cut and fill activities that all but eliminate import or export of soils.

Mitigation Measures:**12-1 Noise (Construction Noticing)**

- The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

12-2 Noise (Construction Staging)

- The construction staging area shall be as far from sensitive receptors as possible.

12-3 Noise (Temporary Construction Barrier – Palmetto Street)

- A temporary construction barrier, capable of achieving a sound attenuation of at least 12 dBA (e.g., construction sound wall with sound blankets) shall be installed along the northerly property line adjacent to Palmetto Street.

12-4 Noise (Construction Notification)

- Two weeks prior to commencement of construction, notification shall be provided to the off-site residences within 500 feet of the Project site that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period.

12-5 Noise (Demolition, Grading, and Construction Activities)

- Construction and demolition shall be restricted to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday.
- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously to the extent feasible.
- The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

12-6 Noise (Parking Structure Ramps)

- Concrete, not metal, shall be used for construction of parking ramps.

- Interior parking structure ramps shall be textured to prevent tire squeal at turning areas.

**Table IV-13
Construction Noise Levels – Mitigated**

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
Multi-Family Residences, 530 Molino St	50	79.0	62.5	79.1	4.0
Multi-Family Residences, 510 N. Hewitt St	50	65.0	64.3	67.7	3.4
Willow Studios, 1333 Willow St	420	65.0	62.5	66.9	4.4
<i>Source: DKA Planning, 2015.</i>					

Construction Noise Impacts After Mitigation

Construction equipment could produce intermittent audible noise increases at these nearby sensitive receptors; however, these impacts would be temporary. As shown in Table IV-13, construction noise increases after mitigation would be reduced at nearby sensitive receptors to less than 5 dBA with implementation of Mitigation Measures 12-1 through 12-6. Noise increases of 5 dBA or more represent a significant audible increase in ambient noise.

With regard to off-site construction-related noise impacts, haul trucks and other on-road vehicles could generate noise. This addition of any truck trips would marginally increase ambient noise along haul route roadways, as truck deployment onto local streets would not happen simultaneously, but rather be phased over the course of site preparation, grading, and construction phases.

Operations Noise Impacts

During Project operations, the development would produce both direct noise impacts on the site from commercial-related activities, as well as indirect noise impacts from vehicles traveling on local roads to access the site. The direct impacts would include stationary noises from sources associated with building operations, such as heating, ventilation, and air conditioning (HVAC) systems.

Section 41.40 and Chapter XI, Articles 1 through 6, of the LAMC requires that noise generated by mechanical equipment not exceed 5 dBA above ambient noise levels at adjacent property lines. Large HVAC systems typically generate noise levels between 50 and 65 dBA at 50 feet.⁴⁰ Rooftop mounted equipment typically produces noise levels of up to approximately 56 dBA at 50 feet. The nearest land uses would be the residences directly to the north and northwest of the proposed Project site, where

⁴⁰ Los Angeles Department of City Planning, San Pedro Community Plan Draft EIR, August 2012.

ambient noise levels would increase 0.1 dBA. This increase is considered inaudible and less than the 5 dBA significance threshold for long-term ambient noise increases. Therefore, stationary noise would be considered a less than significant impact and no mitigation is required.

Finally, long-term noises from the parking structure would be emitted near the entrance on Palmetto Street. However, vehicle usage of this facility is expected to produce a negligible net increase in parking-related noise, as the current site includes surface/roof level parking that is also accessible from Palmetto Street that produces occasional audible noise at the Project site.

The majority of operational noise impacts would be from indirect noise impacts associated with the 4,215 net new vehicle trips each day.⁴¹ The impact of this additional traffic on ambient noise levels in the Project's vicinity was modeled under the existing year (2014) no project scenario and the existing year (2014) plus project scenario utilizing the FHWA TNM 2.5 model. As shown in Tables IV-14 and IV-15, the greatest Project-related noise increases would be 1.7 dBA L_{eq} along eastbound Palmetto Street from Alameda Street to Molino Street in the AM peak hour and PM peak hour.

Mobile noise generated by the proposed Project would not cause the ambient noise level measured at the property line of the affected uses to rise to the "normally unacceptable" or "clearly unacceptable" category or result in any 5 dBA or more increase in noise level. As a result, these inaudible, off-site vehicular noise impacts would be considered a less than significant impact and no mitigation is required.

Table IV-14
Estimated AM Peak Hour Mobile Source Noise Levels

Roadway Segment	Estimated dBA, CNEL			
	No Project (2014)	With Project (2014)	Project Change	Significant Impact?
NW corner of 4 th St and Anderson	74.0	74.0	0.0	No
NE corner of 4 th St and Anderson	75.8	75.8	0.0	No
SE corner of 4 th St and Anderson	72.4	72.4	0.0	No
SW corner of 4 th St and Anderson	71.5	71.5	0.0	No
NW corner of 4 th St and Gless	74.7	74.7	0.0	No
NE corner of 4 th St and Gless	76.8	76.8	0.0	No
SE corner of 4 th St and Gless	73.2	73.2	0.0	No
SW corner of 4 th St and Gless	72.2	72.2	0.0	No
EB 4 th Street between Anderson and Gless	70.0	70.0	0.0	No
WB 4 th Street between Anderson and Gless	72.5	72.5	0.0	No
NW corner of Alameda and 3 rd	73.7	73.7	0.0	No

⁴¹ R.A. Smith National, Inc., *Traffic Impact Analysis Report, At Mateo Retail Development*; February 2015.

NE corner of Alameda and 3 rd	73.7	73.7	0.0	No
SE corner of Alameda and 3 rd	74.2	74.2	0.0	No
SW corner of Alameda and 3 rd	72.8	72.8	0.0	No
NW corner of Alameda and 4 th	72.7	72.7	0.0	No
NE corner of Alameda and 4 th	70.8	70.8	0.0	No
SE corner of Alameda and 4 th	71.6	71.6	0.0	No
SW corner of Alameda and 4 th	72.0	72.0	0.0	No
NW corner of 4 th and Merrick	73.3	73.3	0.0	No
NE corner of 4 th and Merrick	70.7	70.7	0.0	No
SW corner of 4 th and Merrick	72.5	72.6	0.1	No
NE corner of 6 th and Mateo	72.5	72.5	0.0	No
NW corner of 6 th and Mateo	71.3	71.5	0.2	No
SE corner of 6 th and Mateo	70.0	70.0	0.0	No
SW corner of 6 th and Mateo	70.1	70.1	0.0	No
NW corner of Alameda and 6 th	73.5	74.0	0.5	No
NE corner of Alameda and 6 th	73.7	74.1	0.4	No
SE corner of Alameda and 6 th	72.3	73.1	0.8	No
SW corner of Alameda and 6 th	72.6	74.1	1.5	No
NE corner of Alameda and Palmetto	71.1	71.4	0.3	No
SE corner of Alameda and Palmetto	72.0	72.3	0.3	No
NW corner of Alameda and Palmetto	71.2	71.4	0.2	No
WB Palmetto between Alameda and Molino	60.7	62.1	1.4	No
EB Palmetto between Alameda and Molino	60.9	62.6	1.7	No
Shaded cells denote a significant impact on mobile source noise levels Source: DKA Planning 2015.				

Table IV-15
Estimated PM Peak Hour Mobile Source Noise Levels

Roadway Segment	Estimated dBA, CNEL			Significant Impact?
	No Project (2014)	With Project (2014)	Project Change	
NW corner of 4 th St and Anderson	73.2	73.3	0.1	No
NE corner of 4 th St and Anderson	73.3	73.4	0.1	No
SE corner of 4 th St and Anderson	72.0	72.1	0.1	No
SW corner of 4 th St and Anderson	72.9	72.9	0.0	No
NW corner of 4 th St and Gless	73.8	73.8	0.0	No
NE corner of 4 th St and Gless	74.2	74.3	0.1	No
SE corner of 4 th St and Gless	72.5	72.5	0.0	No
SW corner of 4 th St and Gless	73.6	73.7	0.1	No

EB 4 th Street between Anderson and Gless	70.5	70.5	0.0	No
WB 4 th Street between Anderson and Gless	70.7	70.7	0.0	No
NW corner of Alameda and 3 rd	72.7	73.0	0.3	No
NE corner of Alameda and 3 rd	72.2	72.4	0.2	No
SE corner of Alameda and 3 rd	73.3	73.5	0.2	No
SW corner of Alameda and 3 rd	71.8	72.1	0.3	No
NW corner of Alameda and 4 th	75.1	75.2	0.1	No
NE corner of Alameda and 4 th	73.1	73.2	0.1	No
SE corner of Alameda and 4 th	73.7	73.9	0.2	No
SW corner of Alameda and 4 th	74.4	74.5	0.1	No
NW corner of 4 th and Merrick	73.2	73.3	0.1	No
NE corner of 4 th and Merrick	69.4	69.5	0.1	No
SW corner of 4 th and Merrick	73.8	74.0	0.2	No
NE corner of 6 th and Mateo	70.5	71.1	0.6	No
NW corner of 6 th and Mateo	71.1	71.8	0.7	No
SE corner of 6 th and Mateo	71.0	71.4	0.4	No
SW corner of 6 th and Mateo	71.7	72.0	0.3	No
NW corner of Alameda and 6 th	74.3	74.4	0.1	No
NE corner of Alameda and 6 th	73.4	73.6	0.2	No
SE corner of Alameda and 6 th	73.3	73.4	0.1	No
SW corner of Alameda and 6 th	73.8	73.9	0.1	No
NE corner of Alameda and Palmetto	72.0	72.4	0.4	No
SE corner of Alameda and Palmetto	73.5	73.9	0.4	No
NW corner of Alameda and Palmetto	71.9	72.2	0.3	No
WB Palmetto between Alameda and Molino	61.4	63.0	1.6	No
EB Palmetto between Alameda and Molino	61.8	63.5	1.7	No
<i>Shaded cells denote a significant impact on mobile source noise levels</i>				
<i>Source: DKA Planning 2015.</i>				

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Vibration Background

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Unlike noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible. Common sources of vibration include trains, buses, and construction activities.

Vibration Definitions

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings and is usually measured in inches per second. The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (VdB) is commonly used to measure RMS. The decibel notation acts to compress the range of numbers required to describe vibration.⁴²

Effects of Vibration

High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that may affect concentration or disturb sleep. In addition, high levels of ground-borne vibration may damage fragile buildings or interfere with equipment that is highly sensitive to ground-borne vibration.

Perceptible Vibration Changes

Unlike noise, ground-borne vibration is not an environmental issue that most people experience every day. The background vibration velocity level in residential areas is usually 50 RMS or lower, well below the threshold of perception for humans, which is around 65 RMS.⁴³ Most perceptible indoor vibration is caused by sources within buildings, such as movement of people or slamming of doors. Typical outdoor sources of ground-borne vibration are construction equipment, trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is typically not perceptible.

Applicable Regulations

To counter the effects of ground-borne vibration, the Federal Transit Administration (FTA) has published guidance relative to vibration impacts. According to the FTA, non-engineered timber and mason buildings can be exposed to ground-borne vibration levels of 0.2 inches per second without experiencing structural damage, while reinforced concrete, steel, or timber buildings can be exposed to ground-borne vibration levels of 0.5 inches per second.⁴⁴

⁴² Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

⁴³ *Ibid.*

⁴⁴ *Ibid.*

The FTA has also established guidelines that provide thresholds for ground-borne vibration causing human annoyance. Some commercial buildings, such as auditoriums and theaters have additional vibration and noise annoyance criteria.

In terms of construction-related impacts on buildings, the City of Los Angeles has not adopted policies or guidelines relative to groundborne vibration. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as neither the City of Los Angeles nor the County of Los Angeles has a significance threshold to assess vibration impacts during construction, the FTA and California Department of Transportation's (Caltrans) adopted vibration standards for buildings are used to evaluate potential impacts related to Project construction. Based on these standards, impacts relative to groundborne vibration would be considered significant if the following were to occur:

- Project construction activities would cause a PPV groundborne vibration level to exceed 0.5 inches per second at any off-site reinforced-concrete, steel, or timber structure;
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.2 inches per second at any non-engineered timber and masonry buildings (i.e., "fragile" buildings);⁴⁵ and
- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.12 inches per second at any building that is extremely susceptible to vibration damage (i.e., "extremely fragile" buildings).⁴⁶

In addition, the City of Los Angeles has not adopted any thresholds associated with human annoyance for groundborne vibration impacts. Therefore, this analysis uses the FTA's vibration impact thresholds for human annoyance for long-term operational activities not construction. These thresholds include 80 VdB at residences and buildings where people normally sleep (e.g., nearby residences) and 83 VdB at institutional buildings, which includes schools and churches. No thresholds have been adopted or recommended for commercial and office uses. Table IV-16 identifies PPV and RMS velocity (in VdB) levels for the types of off-road and on-road equipment that could operate at the Project site during construction.

⁴⁵ *Ibid.*

⁴⁶ *Ibid.*

Table IV-16
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40
Source: Federal Transit Administration 2006										

Construction Vibration Impacts

Less Than Significant Impact. Groundborne vibration generated by construction activities associated with the proposed Project would primarily affect the off-site sensitive uses located in close proximity to the Project site. As shown in Table IV-16, vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

Vibration velocities projected to occur at the nearest off-site sensitive receptor would produce up to a 0.031 inches/second PPV at the Barker Block complex and Molino Lofts. This PPV is below the 0.2 inches/second that are considered potentially harmful levels of vibration for a non-engineered timber or masonry building. For the purposes of this analysis, it is conservatively assumed that both of these adjacent residences are older, non-engineered structures. Table IV-17 summarizes the peak particle velocity and vibration levels that would occur at these off-site sensitive uses during construction at the Project site. Thus, vibration impacts associated with building damage due to construction activities at the Project site would be less than significant and no mitigation is required.

Table IV-17
Vibration Levels at Off-Site Sensitive Uses From Project Construction

Sensitive Uses Off-site	Distance to Project Site (ft.)	Estimated PPV (in/sec) ^a	Estimated Vibration Levels (VdB) ^b
Multi-Family Residences, 530 Molino St	50	0.031	78
Multi-Family Residences, 510 N. Hewitt St	50	0.031	78
Willow Studios, 1333 Willow St	420	0.001	50

^a The vibration velocities at the off-site sensitive uses are determined with the following equation from the Federal Transit Administration's Transit Noise and Vibration Impact Assessment, Final Report: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$, where PPV_{equip} = peak particle velocity in in/sec of equipment, PPV_{ref} = reference vibration level in in/sec at 25 feet, D = distance from the equipment to the receiver.

^b The vibration levels at the off-site sensitive uses are determined with the following equation from the Federal Transit Administration's Transit Noise and Vibration Impact Assessment, Final Report: $L_v(D) = L_v(25 \text{ ft}) - 30 \log(D/25)$, where L_v = vibration level of equipment, D = distance from the equipment to the receiver, $L_v(25 \text{ ft})$ = vibration level of equipment at 25 feet.

Source: DKA Planning 2015.

In terms of human annoyance, the vibration levels experienced by the off-site sensitive receptors would range from 50 VdB at the Willow Studios to 78 VdB at the adjacent residences to the north of the Project site. Pursuant to FTA guidance, the vibration impacts at these sensitive receptor locations would not exceed 80 VdB at residential buildings. Regardless, any annoyance would be temporary and would not be evaluated against FTA standards that are generally applied to long-term operations.

The proposed Project could generate negligible vibration from haul trucks on local roadways, as grading activities are expected to produce a balance of cut and fill earthwork, resulting in no import or export of soils via haul trucks. As a result, construction-related vibration impacts off-site are expected to be less than significant and no mitigation is required.

Operations Vibration Impacts

Less Than Significant Impact. During operation of the proposed Project, there would not be significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the Project vicinity would be generated by vehicular travel on the local roadways. Road vehicles rarely create enough groundborne vibration to be perceptible to humans unless the road surface is poorly maintained and there are potholes or bumps. If traffic, typically heavy trucks, induces perceptible vibration in buildings, such as window rattling or shaking of small loose items, then it is most likely an effect of low-frequency airborne noise or ground characteristics. Project-related traffic would expose nearby residential land uses and other sensitive receptors during long-term operations to a vibration level far less than 75 VdB and would be considered less than significant and no mitigation is required.

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. The majority of any long-term noise impacts will come from traffic traveling to and from the area. Off-site noise generated by traffic from the Project was modeled under future year (2016) no project and with project conditions utilizing the FHWA TNM 2.5 model. When calculating future noise levels along project area roadways from traffic, additional impacts from eleven additional potential new or proposed projects were considered. Thus, the future traffic results without and with the proposed Project account for the cumulative impacts from these other projects. Since the noise impacts are generated directly from the traffic analysis results, the future without project and future with project noise impacts described in this report already reflect cumulative impacts.

The proposed Project would contribute to future increases in off-site noise levels at project area roadways. Tables IV-18 and IV-19 present the cumulative increase in future traffic noise levels at study intersections during the horizon year 2016 when considering all potential eleven cumulative projects. The greatest project-related noise increases would be 1.3 dBA L_{eq} along eastbound Palmetto Street from Alameda Street to Molino Street in the AM peak hour and 0.7 dBA L_{eq} at the northwest corner of 6th and Mateo Street in the PM peak hour. These impacts are considered negligible and would be less than the 5 dBA significance threshold. Therefore, the Project's individual and cumulative mobile source noise impacts would be considered less than significant.

**Table IV-18
Estimated Cumulative AM Peak Hour Mobile Source Noise Levels**

Roadway Segment	Estimated dBA, CNEL			
	No Project (2016)	With Project (2016)	Project Change	Significant Impact?
NW corner of 4 th St and Anderson	74.3	74.4	0.1	No
NE corner of 4 th St and Anderson	76.1	76.1	0.0	No
SE corner of 4 th St and Anderson	72.7	72.7	0.0	No
SW corner of 4 th St and Anderson	71.9	71.9	0.0	No
NW corner of 4 th St and Gless	74.9	74.9	0.0	No
NE corner of 4 th St and Gless	77.0	77.0	0.0	No
SE corner of 4 th St and Gless	73.4	73.4	0.0	No
SW corner of 4 th St and Gless	72.6	72.6	0.0	No
EB 4 th Street between Anderson and Gless	70.3	70.4	0.1	No
WB 4 th Street between Anderson and Gless	72.8	72.8	0.0	No
NW corner of Alameda and 3 rd	74.1	74.2	0.1	No
NE corner of Alameda and 3 rd	74.1	74.2	0.1	No
SE corner of Alameda and 3 rd	74.7	74.8	0.1	No
SW corner of Alameda and 3 rd	73.2	73.3	0.1	No

NW corner of Alameda and 4 th	73.3	73.3	0.0	No
NE corner of Alameda and 4 th	71.4	71.5	0.1	No
SE corner of Alameda and 4 th	72.3	72.3	0.0	No
SW corner of Alameda and 4 th	72.6	72.8	0.2	No
NW corner of 4 th and Merrick	73.5	73.5	0.0	No
NE corner of 4 th and Merrick	70.9	70.9	0.0	No
SW corner of 4 th and Merrick	72.7	72.8	0.1	No
NE corner of 6 th and Mateo	72.9	73.0	0.1	No
NW corner of 6 th and Mateo	72.2	72.3	0.1	No
SE corner of 6 th and Mateo	70.7	70.7	0.0	No
SW corner of 6 th and Mateo	70.7	70.8	0.1	No
NW corner of Alameda and 6 th	74.0	74.1	0.1	No
NE corner of Alameda and 6 th	74.2	74.2	0.0	No
SE corner of Alameda and 6 th	72.9	72.9	0.0	No
SW corner of Alameda and 6 th	73.1	73.1	0.0	No
NE corner of Alameda and Palmetto	72.0	72.3	0.3	No
SE corner of Alameda and Palmetto	73.0	73.2	0.2	No
NW corner of Alameda and Palmetto	71.9	72.1	0.2	No
WB Palmetto between Alameda and Molino	62.9	64.1	1.2	No
EB Palmetto between Alameda and Molino	63.1	64.4	1.3	No
<i>Shaded cells denote a significant impact on mobile source noise levels</i>				
<i>Source: DKA Planning 2015.</i>				

Table IV-19
Estimated Cumulative PM Peak Hour Mobile Source Noise Levels

Roadway Segment	Estimated dBA, CNEL			
	No Project (2016)	With Project (2016)	Project Change	Significant Impact?
NW corner of 4 th St and Anderson	73.6	73.7	0.1	No
NE corner of 4 th St and Anderson	73.8	73.8	0.0	No
SE corner of 4 th St and Anderson	72.3	72.3	0.0	No
SW corner of 4 th St and Anderson	73.1	73.2	0.1	No
NW corner of 4 th St and Gless	74.1	74.2	0.1	No
NE corner of 4 th St and Gless	74.8	74.8	0.0	No
SE corner of 4 th St and Gless	72.8	72.9	0.1	No
SW corner of 4 th St and Gless	73.9	73.9	0.0	No
EB 4 th Street between Anderson and Gless	70.7	70.7	0.0	No
WB 4 th Street between Anderson and Gless	71.1	71.1	0.0	No
NW corner of Alameda and 3 rd	73.4	73.6	0.2	No

NE corner of Alameda and 3 rd	73.0	73.2	0.2	No
SE corner of Alameda and 3 rd	74.1	74.3	0.2	No
SW corner of Alameda and 3 rd	72.6	72.8	0.2	No
NW corner of Alameda and 4 th	75.7	75.8	0.1	No
NE corner of Alameda and 4 th	73.6	73.8	0.2	No
SE corner of Alameda and 4 th	74.5	74.5	0.0	No
SW corner of Alameda and 4 th	75.0	75.1	0.1	No
NW corner of 4 th and Merrick	73.7	73.9	0.2	No
NE corner of 4 th and Merrick	69.9	70.0	0.1	No
SW corner of 4 th and Merrick	74.1	74.4	0.3	No
NE corner of 6 th and Mateo	71.4	71.9	0.5	No
NW corner of 6 th and Mateo	72.1	72.8	0.7	No
SE corner of 6 th and Mateo	71.8	72.1	0.3	No
SW corner of 6 th and Mateo	72.4	72.7	0.3	No
NW corner of Alameda and 6 th	74.9	75.0	0.1	No
NE corner of Alameda and 6 th	74.0	74.2	0.2	No
SE corner of Alameda and 6 th	73.9	74.0	0.1	No
SW corner of Alameda and 6 th	74.3	74.4	0.1	No
NE corner of Alameda and Palmetto	73.0	73.1	0.1	No
SE corner of Alameda and Palmetto	74.4	74.5	0.1	No
NW corner of Alameda and Palmetto	72.9	73.0	0.1	No
WB Palmetto between Alameda and Molino	63.8	64.0	0.2	No
EB Palmetto between Alameda and Molino	64.2	64.2	0.0	No
Shaded cells denote a significant impact on mobile source noise levels Source: DKA Planning 2015.				

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Unless Mitigation Incorporated. Construction of the Project would contribute to cumulative noise levels during the 18-month process from demolition to occupancy of the new development. In addition to ambient growth in traffic, one project proposed near the Project site was identified as a potential contributor of construction-related noise at study sensitive receptors should construction be done concurrently with the proposed Project:

- 520 South Mateo Street. A mixed-use development with 350 dwelling units and 28,000 square feet of retail approximately 50 feet northeast of the Project site.

As noted in Table IV-12, the construction of the proposed Project would temporarily elevate noise levels significantly at the Molino Lofts (construction noise from the 520 South Mateo site would be

substantially attenuated by the presence of the Molino Lofts between the two land uses). Construction of the 520 South Mateo project would similarly elevate noise levels at the Molino Lofts, given its similar orientation and distance to the development. As such, both would need to implement source-reduction mitigation measures that could include use of noise mufflers on off-road equipment and erection of temporary sound barriers facing the Molino Lofts. Mitigation Measures 12-1 through 12-6 would reduce the Project's contribution to this impact to a less than significant level.

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

No Impact. A significant impact may occur if the Project were located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project site. There are no airports within a two-mile radius of the Project site, and the Project site is not within any airport land use plan or airport hazard zone. The Project would not expose people to excessive noise levels associated with airport uses. No impact would occur.

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

No Impact. This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The Project site is not located in the vicinity of a private airstrip. As no such facilities are located in the vicinity of the Project site, no impact would occur.

Cumulative Impacts: Noise

Less Than Significant Impact. With the exception of the cumulative development project located at 520 Mateo Street (discussed in Question (d) above), construction and operation activities for the proposed Project would not result in cumulative noise impacts, as the nearest cumulative development projects are located a substantial distance away. Due to the distance between the Project site and these cumulative projects, and the intervening structures that block the line of sight between these construction sites, the noise sources from each construction site would not be cumulatively considerable. With respect to cumulative operational noise impacts, the 2016 Future Year noise impacts for the AM and PM peak hours (as shown in Tables IV-18 and IV-19, above) address cumulative impacts as the traffic volumes for the future year include the Project traffic volumes plus the traffic volumes of all cumulative projects. Thus, as shown in the tables above, the Project's cumulative contribution to ambient noise levels is considered less than significant.

13. POPULATION AND HOUSING

a) **Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

Less Than Significant Impact. A significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the project area that would otherwise not have occurred as rapidly or in as great a magnitude. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on population and housing growth shall be made considering: (a) the degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and (c) the extent to which growth would occur without implementation of the project.

In October 2008, SCAG approved and adopted the “2008 Regional Comprehensive Plan for the SCAG Region – Helping Communities Achieve A Sustainable Future” (2008 RCP). The 2008 RCP is a long-term comprehensive plan that provides a strategic vision for handling the region’s land use, housing, economic, transportation, environmental, and overall quality-of-life needs. The 2008 RCP is intended to serve as an advisory document for local agencies in the SCAG region. The following vision statement and guiding principles are based on the region’s adopted Compass Growth Vision Principles for Sustaining a Livable Region. These statements further articulate how the RCP can promote and sustain the region’s mobility, livability, and prosperity for future generations.

RCP Vision

To foster a Southern California region that addresses future needs while recognizing the interrelationship between economic prosperity, natural resource sustainability, and quality of life. Through measured performance and tangible outcomes, the RCP serves as both a voluntary action plan with short-term guidance and strategic, long-term initiatives that are guided by the following Guiding Principles for sustaining a livable region.

RCP Guiding Principles

- *Improve mobility for all residents.* Improve the efficiency of the transportation system by strategically adding new travel choices to enhance system connectivity in concert with land use decisions and environmental objectives.

- *Foster livability in all communities.* Foster safe, healthy, walkable communities with diverse services, strong civic participation, affordable housing and equal distribution of environmental benefits.
- *Enable prosperity for all people.* Promote economic vitality and new economies by providing housing, education, and job training opportunities for all people.
- *Promote sustainability for future generations.* Promote a region where quality of life and economic prosperity for future generations are supported by the sustainable use of natural resources.

SCAG's Compass Growth Vision Strategy

SCAG's Compass Growth Vision, adopted in 2004, and incorporated into the 2008 RCP, encourages better relationships between housing, transportation, and employment. The Growth Vision is driven by four key principles: (1) Mobility – Getting where we want to go, (2) Livability – Creating positive communities, (3) Prosperity – Long-term health for the region, and (4) Sustainability – Preserving natural surroundings. Additionally, the Compass Growth Vision incorporates a 2% Growth Strategy that will increase the region's mobility by:

- Putting new employment centers and new neighborhoods near major transit systems so that people can have transportation choices other than their cars.
- Designing safe, attractive transit centers and plazas that people enjoy using.
- Creating mini-communities around transit stations, with small businesses, urban housing and restaurants all within an easy walk.

On a policy level, the Proposed Project is consistent with the goals and strategies of the RCP and the Compass Growth Vision Strategy discussed above. With respect to regional growth forecasts, SCAG forecasts the City of Los Angeles Subregion will experience a population increase to 4.34 million persons by 2030. As shown in Table IV-20, the SCAG forecast from 2010 through 2030 envisions growth of 290,797 additional persons, yielding an approximate 6.7 percent growth rate.

Table IV-20
SCAG's 2008 RCP Growth Forecast
for the City of Los Angeles Subregion

Projection Year	Population	Households	Person/Households
2010	4,057,484	1,386,658	2.92
2030	4,348,281	1,578,850	2.75
<i>Net Change from 2010 to 2030</i>			
No. of Population/Households	290,797	192,192	
Percent Change	6.7%	13.2%	

Source: SCAG, 2008 Regional Comprehensive Plan (RCP) Update, adopted May 8, 2008.

Construction

Construction job opportunities created as a result of the Proposed Project are not expected to result in any substantial population growth in the Project area. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the timeframe in which their specific skills are needed to complete a particular phase of the construction process.

Additionally, the construction workers would likely be supplied from the region's labor pool. The unemployment rate for construction jobs was 6.4% as of October 2014.⁴⁷ Construction workers would not be likely to relocate their household as a consequence of working on the Project, and as such, significant housing or population impacts would not result from construction of the Project. Therefore, construction-related population growth impacts would be less than significant.

Operation

The Proposed Project would develop 170,906 square feet of commercial retail, restaurant and creative office space on a site that is currently used for light industrial warehousing. Because the Project does not propose any residential land uses, development of the Project would not result in any direct permanent population increase and would thus have no impact with respect to population growth forecasts.

As shown in Table IV-21, the construction of 170,906 square feet of commercial space, including 73,291 square feet of retail space, 48,040 square feet of creative office space, and 49,575 square feet of on-site restaurant/bar space, at the Project site would generate approximately 443 employees. The existing industrial uses at the Project site employ approximately 200 persons, resulting in a net increase in employment at the site of 243 persons as a result of Project development.

Table IV-21
Project Estimated Employment Generation

Land Use	Size	Employee Generation Rates	Total Employees
Retail	73,291 sf	2.2371 employees/1,000 sq.ft.	164
Creative Office	48,040 sf	3.4965 employees/1,000 sq.ft.	168
Restaurant/Cafe	49,575 sf	2.2371 employees/1,000 sq.ft.	111
Total Project Employment			443
Less Existing Industrial Uses	148,000 sf	1.35 employees/1,000 sq.ft.	199.8

⁴⁷ Bureau of Labor Statistics: <http://www.bls.gov/iag/tgs/iag23.htm>, accessed October 2014.

Table IV-21
Project Estimated Employment Generation

Land Use	Size	Employee Generation Rates	Total Employees
Net Increase in Employment at Project Site			243
<i>Note: sf = square feet</i> <i>Source: Employment rates based on Los Angeles Unified School District, 2012 Developer Fee Justification Study, February 9, 2012.</i> <i>Source: CAJA Environmental Services, LLC 2015.</i>			

Localized Growth Forecasts

Table IV-22 shows the existing (2010) population, housing, and employment within the Central City North Community Plan area. Table IV-23 shows the SCAG projected growth of the City of Los Angeles in population, housing, and employment to 2020. The Proposed Project's 243 employee net increase at the site would be well within SCAG estimates of growth for the City between 2008 and 2020. Therefore, the Proposed Project would result in a less than significant impact with respect to population, housing, and employment growth.

Table IV-22
Population, Housing and Employment in the Central City North Community Plan Area

	Population	Housing (units)	Employment (jobs)
2010	38,839	7,481	41,855
<i>Source: City of Los Angeles, Central City North Community Plan, page I-3</i>			

Table IV-23
2020 Population, Housing and Employment Growth Forecasts for the City of Los Angeles

	Population	Housing (units)	Employment (jobs)
2008	3,770,500	1,309,900	1,735,200
2020	3,991,700	1,455,700	1,817,700
Change (2008-2020)	+221,200	+145,800	+82,500
<i>Source: SCAG 2012 Adopted Growth Forecasts: http://www.scag.ca.gov/forecast/index.htm</i>			

Infrastructure Impacts

Additionally, the Project would not cause growth (i.e., new employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Project buildout, and that would result in an adverse physical change in the environment; or introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan. Therefore, growth impacts of the Project related to infrastructure would be less than significant.

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

No Impact. A significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Project would consist of the development of new housing and commercial land uses on a site that is currently occupied industrial warehouses. No displacement of existing housing would occur with the development of the Project, and therefore, no impact would occur.

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if a project would result in the displacement of existing occupied housing units, necessitating the construction of replacement housing elsewhere. The Project would consist of the development of new housing and commercial land uses on a site that is currently occupied by industrial warehouses. No displacement of existing occupied housing would occur with development of the Project, and therefore, no impact would occur.

Cumulative Impacts: Population and Housing

Less Than Significant Impact. Development of the Proposed Project in conjunction with the cumulative development projects would introduce additional residential, hotel, commercial/retail/restaurant, office, school, parking, and entertainment industry related uses to an already highly urbanized area of the City of Los Angeles. Any residential projects would result in direct population growth in the City of Los Angeles, while other types of cumulative projects could result in indirect population growth. Development of the cumulative projects is expected to occur in accordance with adopted plans and regulations. Furthermore, the Proposed Project, in conjunction with the cumulative projects, are the types of projects encouraged by SCAG and City policies to accommodate growth in urban centers that are close to existing employment centers and mass transit. Because no residents would be displaced and the population growth associated with the Project has already been anticipated and planned for within the City, cumulative impacts to population and housing would be less than significant.

14. PUBLIC SERVICES

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 could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective for any of the following public services:**

i) ***Fire Protection***

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.09.07A, the maximum response distance between residential and commercial land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles. If this distance is exceeded, all structures would be required to install automatic fire sprinkler systems.⁴⁸

The Project would include 170,906 square feet of retail, office, and restaurant space on a site that was previously developed with 148,000 square feet of industrial warehouse space. The Project would not generate any new permanent residents, but would be expected to attract a greater amount of employee/patron/visitor traffic to the site than is currently occurring. Therefore, the Project could potentially increase the demand for LAFD services. The Project site is located nearly equidistant from three different fire stations: LAFD Station No. 4, located at 450 East Temple Street, is located approximately one mile north of the site; LAFD Station No. 9, located at 430 East 7th Street, is located approximately 1.2 miles west of the site; and LAFD Station No. 17, located at 1601 South Santa Fe Avenue, is located approximately 1.2 miles south of the site. Each of these stations could potentially provide fire protection services to the Project site. All three stations are equipped with an Engine Company, Task Force, and Rescue Ambulance, while Station 17 also maintains a hazardous materials response apparatus. Since the response distance does not exceed the 1.5-mile distance, fire protection response would be considered adequate, and impacts related to response distances would be less than significant.

Emergency vehicle access to the Project site would continue to be provided from local and major roadways (i.e., Mateo Street, Palmetto Street). All circulation improvements proposed would be in compliance with the Fire Code, including any additional access requirements of the LAFD. Additionally,

⁴⁸ LAFD website: http://lafd.org/prevention/hydrants/division_9_fc.html, accessed September 2013.

emergency access to the Project site would be maintained at all times during both Project construction and operation. Therefore, impacts related to emergency access would be less than significant.

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The required fire flow necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Pursuant to LAMC Section 57.09.06, City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm is flowing. The overall fire flow requirement for the Project's neighborhood-serving retail/restaurant development is 4,000 gpm from four fire hydrants flowing simultaneously with a residual water pressure of 20 PSI. The adequacy of existing water pressure and availability in the Project area with respect to required fire flow would be confirmed by LAFD during the plan check review process. As part of the normal building permit process, the Project will be required to upgrade water service laterals, meters, and related devices as may be required to provide required fire flow; however, no new water facilities are anticipated. Additional fire hydrants may be required, depending on the building design and Fire Department requirements. Such improvements would be conducted as part of the Project either on-site or off-site within the right-of-way under the City's B-Permit process. Construction activities to install any new pipes or pumping infrastructure would be temporary and in short duration and would not result in any significant environmental impacts.

Prior to the final approval of Project plans, the Project Applicant would be required to consult with the Los Angeles Fire Department regarding the installation of public and/or private fire hydrants, sprinklers, access, and/or other fire protection features within the Project. All required fire protection features must be installed to the satisfaction of the Los Angeles Fire Department. Through compliance with this requirement, Project impacts with respect to fire protection services would be less than significant.

(ii) Police Protection

Less Than Significant Impact. For the purpose of this analysis, a significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station, the construction of which may cause significant environmental impacts. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on police protection shall be made considering the following factors: (a) the population increase resulting from the project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for police services anticipated at the time of project buildout compared to the expected level of service available, considering, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and (c) whether the project includes security and/or design features that would reduce the demand for police services.

The Project site is currently served by the City of Los Angeles Police Department's (LAPD) Central Bureau, which oversees LAPD operations in the Central, Hollenbeck, Newton, and Rampart areas. The Central Community Police Station, located at 251 East 6th Street, approximately 1.4 miles driving distance from the Project site. The Central Community Police Station area is approximately 4.5 square miles and includes the communities of Chinatown, Little Tokyo, South Park, Central City East, Historic Core, Financial District, Artist Lofts, Olvera Street, Jewelry District, the Convention Center, and the Fashion District. The boundaries of Central Area are as follows: Interstate 110 to the north, Washington Boulevard and 7th Street to the south, Metrolink Railroad Tracks to the east, and Interstate 110 to the west. Table IV-24 provides the most recent available crime statistics for Reporting District 159 within the Central City area.

Table IV-24
Project Area Crime Statistics

Crimes	2014	2013	2012
<i>Violent Crimes</i>			
Homicide	1	0	0
Rape	2	1	1
Robbery	11	9	13
Aggravated Assault	10	5	1
Total Violent Crimes	24	15	15
<i>Property Crimes</i>			
Burglary	4	8	12
Motor Vehicle Theft	15	11	26
Larceny	90	73	No report
Stolen Property	0	2	No report
Total Property Crimes	109	94	38
Total Part 1 Crimes	133	109	53
Public Intoxication	12	0	9
Disturbing Peace	10	1	9
Driving While Intoxicated	1	1	10

Construction

Construction sites, if not properly managed, have the potential to attract criminal activity (such as trespassing, theft, and vandalism) and can become a distraction for local law enforcement from more pressing matters that require their attention. However, the Project would employ construction safety features including erecting temporary fencing around the periphery of the active construction site to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

Operation

Operation of the Project would result in an increase of customers, visitors, and employees within the Project site, thereby generating a potential increase in the number of service calls from the site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The Project would implement principles of the City of Los Angeles Crime Prevention through Environmental Design (CPTED) Guidelines. Specifically, the Project would include adequate and strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed “dead zones” would be limited and, where possible, security controlled to limit public access. The building and layout design of the Project would also include nighttime security lighting and secure underground parking facilities. In addition, the continuous visible and non-visible presence of patrons and employees until as late as 12:00 a.m. would provide a sense of security during evening hours. These preventative and proactive security measures would decrease the amount of service calls the LAPD would receive. In light of these features, it is anticipated that any increase in demands upon police services would be relatively low, and would not necessitate the construction of a new police station, the construction of which may cause significant environmental impacts.

Prior to the final approval of Project plans, the Project Applicant would be required to consult with the LAPD regarding the incorporation of crime-reducing design principles and security features into the Project. Through compliance with this requirement, Project impacts with respect to police protection services would be less than significant.

(iii) Schools

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on public schools shall be made considering the following factors: (a) the population increase resulting from the project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for school services anticipated at the time of project buildout compared to the expected level of service available (considering, as applicable, scheduled improvements to LAUSD services [facilities, equipment, and personnel] and the project’s proportional contribution to the demand; (c) whether (and to the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and (d) whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

The Project area is currently served by the following LAUSD public schools: 9th Street Elementary School, located at 835 Stanford Avenue, which serves kindergarten through fifth-grade students; and Hollenbeck Middle School, located at 2510 E. Sixth Street, which serves sixth- through eighth-grade students. Prospective students would have a choice of the following LAUSD high schools: Theodore Roosevelt Senior High, located at 456 S. Mathews Street, which serves ninth- through twelfth-grade students; Felicitas and Gonzalo Mendez Senior High, located at 1200 Plaza Del Sol, which serves ninth-through twelfth-grade students; the Boyle Heights Science Technology Engineering and Math High School, located at 2510 East 6th Street, which serves ninth- and tenth-grade students; and the Roosevelt Senior High School of Environmental and Social Policy, located at 3501 North Broadway, which serves ninth- through twelfth-grade students.⁴⁹

As shown in Table IV-25, the Project would generate an increase of five school students when the existing industrial uses at the site are accounted for. Specifically, the Project would generate approximately one more elementary school, two more middle school, and two more high school students than the site's existing uses. It is likely that some of the students generated by the Project would already reside in areas served by the LAUSD and would already be enrolled in LAUSD schools. However, for a conservative analysis, it is assumed that all students generated by the Project would be new to the LAUSD.

Table IV-25
Project Estimated Student Generation

Land Use	Size	Elementary School Students ^{a,b}	Middle School Students ^{a,b}	High School Students ^{a,b}	Total Students
Creative Office	48,040 sf	1	1	1	3
Retail/Restaurant	122,866 sf	3	2	2	7
Total Project Estimated Students		4	3	3	10
Less Existing Students (148,000 sf industrial)^c		-3	-1	-1	-5
Net Additional Students		1	2	2	5
<i>Notes:</i> <i>sf = square feet; du = dwelling units</i> ^a Student generation rates are as follows for commercial retail uses: .0234/1,000 sf elementary, .0123/1,000 sf middle and .0123 high school students. ^b Student generation rates are as follows for office uses: 0.0000233 elementary students/sf; 0.0000108 middle school students/sf; and 0.0000104 high school students/sf. ^c Student generation rates are as follows for industrial uses: .0180 elementary, .0083 middle and .0080 high school students per 1,000 sf. <i>Source: Los Angeles Unified School District, Developer Fee Program Office, Student Generation Rates, July 2010.</i>					

⁴⁹ Los Angeles Unified School District, Resident School Identifier, website: [http://rsi.lausd.net/ResidentSchool Identifier/](http://rsi.lausd.net/ResidentSchoolIdentifier/), accessed January 2015.

California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirements against any construction within the boundaries of the district, for the purposes of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district's levy of the fees authorized by California Education Code Section 17620.

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA, or other state or local law.

The Project Applicant will be required to pay mandatory developer fees to offset the Project's demands upon local schools. Thus, the Project's potential impact upon public school services would be less than significant.

(iv) Parks

Less Than Significant Impact. A significant impact would occur if the Project resulted in the construction of new recreation and park facilities that creates significant direct or indirect impacts to the environment.

The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. A half-mile radius is the standard service radius for neighborhood parks, and a two-mile radius is the standard service radius for community parks. Table IV-26 shows the parks and recreation centers that are located within an approximate two-mile radius of the Project site, according to LADRP's facility locator.

**Table IV-26
Recreation and Park Facilities within the Project Area**

Park Name	Park Size	Park Amenities	Distance to Project Site
6 th and Gladys Street Park	0.33 acre	Basketball courts and children's play area	0.5 mile
Aliso Pico Recreation Area	4.41 acres	Auditorium, baseball diamond, basketball courts, children's play area, community room, indoor gym, tennis courts and volleyball courts.	0.6 mile
Spring Street Park	0.70 acres	Walking paths, landscaping, lawn, seating, water feature and art work	1.3 miles
Pershing Square	5.02 acres	Civic events, ice skating (seasonal), outdoor stage, open space and park benches.	2.0 miles
City Hall Park Center	1.71 acres	Open Space	1.1 miles
Boyle Heights Sports Center	7.18 acres	Barbecue pits, baseball diamond, basketball courts, children's play area, community room and picnic tables.	1.4 miles
Los Angeles Plaza Park	1.81 acres	Open space	1.2 miles
Pecan Park	4.28 acres	Basketball courts, children's play area, community room, handball courts, indoor gym, picnic tables, restroom, seasonal pool and volleyball courts.	0.8 mile
Hollenbeck Park	18.30 acres	Auditorium, barbecue pits, basketball courts, children's play area, community room, indoor gym and picnic tables.	1.0 mile
Grand Park (Civic Center)	12 acres	Open space, benches, landscaping, coffee shop, performance lawn, event lawn, fountain, and community terrace.	1.7 miles
Total Parkland	55.7 acres		
<i>Source: City of Los Angeles Department of Recreation and Parks, Location Map, website: http://raponline.lacity.org/maplocator, accessed January 2015. Parcel sizes were measured using City of Los Angeles Department of Planning, Zone Information and Map Access System, website: http://zimas.lacity.org/, accessed January 2015. Distances to facilities were measured within a two-mile walking distance from the Project site using Google Maps, accessed January 2015.</i>			

The Public Recreation Plan (PRP), a portion of the Service Systems Element of the City of Los Angeles General Plan, provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards. The desired long-range standard for local parks is based on two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks or

four acres per 1,000 persons of combined neighborhood and community parks. However, the PRP also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of one acre per 1,000 persons for neighborhood parks and one acre per 1,000 persons for community parks, or two acres per 1,000 people of combined neighborhood and community parks. It is important to note that these standards are Citywide goals and are not intended to be requirements for individual development projects.

The Project site is located within a highly urbanized area of the Central City North community and has access to approximately 56 acres of parkland and public recreation facilities within a two-mile radius. As summarized in Table IV-26 above, these facilities range in size from a 0.3-acre street park to the 18-acre Hollenbeck Park and Recreation Center. Development of the Project would not increase the residential population of the Central City North Community Plan area and, therefore, would not generate a need for additional public parkland.

The Project would provide approximately 15,000 square feet of open space on-site, consisting primarily of paseos and landscaping. Because the Project does not propose any residential units, it would not be subject to the applicable provisions of LAMC Sections 12.33 and/or 17.12, requiring the payment of Quimby fees to the City of Los Angeles, or LAMC Section 21.10.3(a)(1) requiring payment of a Dwelling Unit Construction Tax. Thus, the Project's impact upon parks and recreational facilities would be less than significant and no mitigation is required.

(v) Other Public Facilities

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project site. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on libraries shall be made considering the following factors: (a) the net population increase resulting from the project; (b) the demand for library services anticipated at the time of project buildout compared to the expected level of service available (considering, as applicable, scheduled improvements to existing library services [renovation, expansion, addition or relocation] and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct financial support to the Los Angeles Public Library).

Within the City of Los Angeles, the Los Angeles Public Library (LAPL) provides library services at the Central Library, seven regional branch libraries, 56 community branches and two bookmobile units, consisting of a total of five individual bookmobiles. Approximately 6.5 million books and other materials comprise the LAPL collection. The LAPL branches currently serving the Project site include the Central Library, located at 630 W. 5th Street, approximately 1.8 miles northwest of the Project site, and the newly constructed Little Tokyo Branch Library located at 203 S. Los Angeles Street, approximately 1.5 miles

northwest of the Project site. Table IV-27 below lists these libraries and their corresponding volumes and circulation.

Table IV-27
Los Angeles Public Libraries in Project Vicinity

Name	Address	Size (sf)	Volumes / Circulation	Current / Future Service	Staff
Los Angeles Central Library	630 W. 5 th St.	538,000	2.7 million / 942,297	3,792,621 / 4,298,891	174
Little Tokyo Branch	203 S. Los Angeles St.	12,500	67,107 / 172,580	43,912 / No Forecast	8.25
<i>Current – 2010 Census; Future – 2020 SCAG projections</i> <i>Staffing is full-time equivalent.</i>					

The Project would not generate any new residential population at the site and, therefore, would not generate any additional residential demand for library services. The Project is forecast to increase the number of employees at the site by 243 employees compared to existing uses on-site. Employees of commercial and retail development do not typically frequent libraries during work hours but are more likely to use libraries near their homes during non-work hours. Therefore, potential impacts to library services and facilities resulting from Project employment generation would be less than significant.

Cumulative Impacts: Public Services

(i) Fire Protection

Less Than Significant Impact. Development of the Project, in conjunction with the cumulative development projects, would result in an intensification of existing land uses in an already highly urbanized area of Los Angeles and could increase the demand for fire protection services in the vicinity of the projects. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Project and the cumulative projects would contribute. Each project would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD in order to adequately mitigate fire protection impacts. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development on any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project area. Therefore, no impacts from new fire station construction are currently anticipated to occur. On this basis, the Project would not make a cumulatively considerable

contribution to the need for new fire protection facilities, and cumulative impacts on fire protection would be less than significant.

(ii) Police Protection

Less Than Significant Impact. Development of the Project, in conjunction with the cumulative development projects, would result in an intensification of existing land uses in an already heavily urbanized area of Los Angeles and could increase the demand for police protection services in the vicinity of the projects. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Project and the cumulative projects would contribute. In addition, each project would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Furthermore, each cumulative project would likely be required to install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services.

To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development on any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently have any plans for the development of new police stations in the vicinity of the Project site, no impacts with respect to construction of new stations are currently anticipated to occur. On this basis, the Project would not make a cumulatively considerable contribution to the need for new police protection services or facilities, and cumulative impacts on police protection would be less than significant.

(iii) Schools

Less Than Significant Impact. Development of the Project, in conjunction with the cumulative development projects, would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles and would be expected to result in a cumulative increase in the demand for school services. One of the 19 cumulative projects involves the redevelopment of 9th Street Elementary (see Cumulative Project #12). Together, the cumulative projects would have the potential to generate students who would attend the same schools as the proposed Project.

As shown in Table IV-28, the Project, together with the cumulative projects, would cumulatively contribute approximately 874 elementary school students, 425 middle school students, and 426 high school students. This would create an increased cumulative demand on the local school districts. However, each cumulative project would be required to pay school developer fees, pursuant to California Education Code Section 17620(a)(1), which would alleviate cumulative impacts. As such, cumulative impacts on schools would be less than significant.

**Table IV-28
Projected Cumulative Development Student Population**

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
Industrial ^{a b}	360,205 sf	6	3	3	12
Multi-Family Residences ^c	4,118 du	841	407	410	1,658
Office ^d	900,676 sf	21	10	9	40
Retail ^{e f}	368,729 sf	5	3	2	10
Cumulative projects Student Total: ^g		873	423	424	1,720
Proposed Project Net Student Total:		1	2	2	5
Cumulative Student Total:		874	425	426	1,725
Proposed Project's % of Cumulative:		0.01%	0.02%	0.02%	0.02%
Notes: <i>sf</i> = square feet; <i>du</i> = dwelling units ^a Student generation rates are as follows for industrial uses: .0180 elementary, .0083 middle and .0080 high school students per 1,000 sf. ^b Includes manufacturing, warehouse and bus maintenance uses. ^c Student generation rates are as follows for residential uses: .2042 elementary, .0988 middle and .0995 high school students per unit. ^d Student generation rates are as follows for office uses: .0233 elementary, .0108 middle and .0104 high school students per 1,000 sf. ^e Student generation rates are as follows for retail uses: .0149 elementary, .0069 middle and .0067 high school students per 1,000 sf. ^f Includes restaurant (fast-food and quality) uses. ^g Excludes school and child care cumulative projects. Source: Los Angeles Unified School District, Developer Fee Program Office, Student Generation Rates, July 2010.					

(iv) Parks

Less Than Significant Impact. Development of the Project, in conjunction with the cumulative projects, could result in an increase in permanent residents residing in the vicinity. In the absence of mitigation, additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the long-term goal standards. However, each of the residential projects is expected to comply with payment of Quimby (for condominium units or projects seeking zone changes, including those projects seeking to take advantage of the new Live/Work Zone) or other fees, such as the Dwelling Unit Construction Tax (for apartment units). Each residential project would also be required to comply with the on-site open space requirements of the LAMC.

Therefore, with payment of the applicable recreation fees on a project-by-project basis, cumulative impacts would be less than significant.

(v) Other Public Facilities

Less Than Significant Impact. Development of the cumulative projects that have residential components could generate additional residents who could increase the demand upon library services. This increase in resident population would increase demand upon public library services. To meet the increased demands upon the City's Public Library system, Los Angeles voters passed a Library Bond Issue for \$178.3 million to improve, renovate, expand, and construct 32 branch libraries. Since the Program's inception in 1998, the Library Department and the Department of Public Works, Bureau of Engineering have made considerable progress in the design and construction of the branch library facilities. As noted, the Central Library far exceeds the LAPL criteria for its service area. The Project would not make a cumulatively considerable contribution to impacts upon the City's library system. Therefore, cumulative impacts related to library facilities would be less than significant.

15. RECREATION

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

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which would increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available (consider, as applicable, scheduled improvements to recreation and park services [renovation, expansion, or addition] and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

The Project is a commercial retail project that would not generate any permanent population increase and will provide approximately 15,000 square feet of open space areas for public enjoyment. As noted in Table IV-26, above, there are 10 existing, new, and recently improved parks within the Project area totalizing more than 56 acres that are available to serve the future retail visitors to the Project site. Because the Project would not increase the residential population of the site or area, it would not substantially 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 and would thus have a less than significant impact.

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

Less Than Significant Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. The Project will provide approximately 15,000 square feet of open space areas on-site. As previously discussed in Question 15(a), the Project would not require the construction or expansion of recreational facilities beyond the limits of the Project site. As noted above, there are 10 existing, new, and recently improved parks within the Project area totalizing more than 56 acres that are available to serve the visitors to the Project site. The Project would not generate increased demands upon recreational facilities and would not necessitate the construction of a new park, which might have an adverse physical effect on the environment. Thus, impacts to park and recreational facilities would be less than significant.

Cumulative Impacts: Recreation

Less Than Significant Impact. Development of the Project in conjunction with the cumulative projects would be expected to increase the cumulative demand for parks and recreational facilities in the City of Los Angeles. A number of new parks and recently renovated park improvements have been made in the downtown area to accommodate cumulative demands created by increased residential development. Each cumulative project that includes residential units would be required to pay the Dwelling Unit Construction Tax and/or applicable Quimby fees to mitigate impacts upon park and recreational facilities. Additionally, each such residential project would be subject to the provisions of the LAMC for providing on-site open space, which is proportionately based on the amount of new development. The Project would not contribute to the potential cumulative impact on recreational resources, and cumulative impacts on park and recreation facilities would be less than significant.

16. TRANSPORTATION AND TRAFFIC

The following section summarizes and incorporates by reference the information provided in the Traffic Study for the At Mateo Project (Traffic Study) prepared by R.A. Smith National, Inc., dated February 6, 2015 and Updated Traffic Assessment Memorandum dated June 8, 2015. The Los Angeles Department of Transportation (LADOT) approved the Traffic Study on February 9, 2015. The Traffic Study, Updated Traffic Assessment Memorandum, and approval memorandum from the LADOT are provided as Appendix F to this Draft IS/MND.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact could occur if a project were to result in substantial increases in traffic volumes in the vicinity of the project such that the existing street capacity experiences a decrease in the existing volume to capacity ratios, or experiences increased traffic congestion exceeding LADOT's recommended level of service. As discussed in Section II, Project Description, vehicular access to the Project site will be provided via a driveway/garage entry/exit on Palmetto Street.

Introduction

Area Transportation Facilities

The Project site is located just east of downtown Los Angeles, an area that is served by an extensive freeway network. The Santa Ana Freeway (US-101) and the Golden State Freeway (I-5) provide primary regional access to the general area of the Project site. Both freeways run in a north-south direction and are located east of the Project site. These two facilities also provide access to the San Bernardino (I-10) and Pomona (State Route 60) Freeways to the east, to the Harbor Freeway (I-110) to the west, and to the Santa Monica Freeway (I-10) to the south.

The following streets serve the Project study area:

- Alameda Street: This north-south roadway is four lanes divided in the study area. Alameda Street is classified as a Major Class II in the City of Los Angeles General Plan Transportation Element.
- Palmetto Street: This east-west roadway is two lanes undivided in the study area. Palmetto Street is classified as a Collector in the City of Los Angeles General Plan Transportation Element.
- Mateo Street: This north-south roadway is two lanes undivided in the study area. Mateo Street is classified as a Secondary in the City of Los Angeles General Plan Transportation Element.
- 6th Street: This east-west roadway is four lanes undivided in the study area. 6th Street is classified as a Secondary in the City of Los Angeles General Plan Transportation Element.

The characteristics of the roadways in the vicinity of the Project site are presented in Table IV-29.

Table IV-29
Study Area Roadway Characteristics

Segment	No. of Lanes		Median Type*	Posted Speed Limit (mph)	Daily Traffic Volumes ¹
	NB/EB	SB/WB			
E. 4 th Place	0	4	N/A (one-way)	35	23,200
E 4 th Street					
West of Hewitt Street	2 to 4	0	N/A (one way)	35	12,500
East of Hewitt Street	2 to 3	2 to 3	Striped	35	35,100
E. 6 th Street	2	2	Striped	35	12,300
E. 7 th Street	2	2	Striped	35	20,900
Mateo Street	1	1	Striped	25	4,000
Molino Street	1	1	Not Striped	25	-
Palmetto Street	1	1	Not Striped	25	-
Santa Fe Avenue					
South of E. 4 th Place	1	1	Striped	30	15,200
North of E. 4 th Place	1	1	Striped	25	12,500
S. Alameda Street	2	2	Striped	35	26,600
* = All roadways are divided					
¹ Source: LADOT					

Level of Service Methodology

Level of Service (LOS) is a qualitative measure used to describe the condition of traffic flow, ranging from excellent conditions at LOS A to overloaded conditions at LOS F, with each level defined by a range of volume/capacity (V/C) ratios. Table IV-30 defines the ranges of V/C ratios and their corresponding levels of service for signalized intersections. LOS D is typically recognized as the satisfactory service level in urban areas, and LOS E is often recognized as the standard in downtown areas. Intersection analysis was conducted using the “Critical Movement Analysis (Planning Method)” as described in “Transportation Research Circular 212, Transportation Research Board, Washington D.C. 1980,” to obtain volume/capacity (V/C) ratios for each intersection.

Table IV-30
Level of Service as a Function of CMA Value or Average Vehicle Delay

CMA Value	Level of Service	Intersection Operation/Traffic Flow Characteristics
≤ 0.600	A	Excellent Operation
> 0.600 ≤ 0.700	B	Very Good Operation
> 0.700 ≤ 0.800	C	Good Operation
> 0.800 ≤ 0.900	D	Fair Operation
> 0.900 ≤ 1.000	E	Poor Operation
> 1.000	F	Forced Flow
Source: The Mobility Group, 2013.		

Thresholds of Significance

Intersection Capacity

LADOT defines a significant traffic impact attributable to a project based on a “stepped scale”, with intersections at high volume-to-capacity (V/C) ratios being more sensitive to additional traffic than those operating with available surplus capacity. A significant impact is identified as an increase in the V/C value, due to project-related traffic, of 0.010 or more when the final (“with project”) Level of Service is E or F, a V/C increase of 0.020 or more when the final Level of Service is LOS D, or an increase of 0.040 or more at LOS C, as summarized in Table IV-31. No significant impacts are deemed to occur at LOS A or B, as these operating conditions exhibit sufficient surplus capacities to accommodate traffic increases with little effect on traffic delays.

Table IV-31
City of Los Angeles Significant Traffic Impact Criteria

With Project Traffic		Project-Related Increase in V/C Ratio
LOS	V/C Ratio	
C	0.701 - 0.800	Equal to or greater than 0.040
D	0.801 - 0.900	Equal to or greater than 0.020
E/F	> 0.900	Equal to or greater than 0.010
Source: LADOT		

Study Intersections

The scope of the traffic study was reviewed and approved by the City of Los Angeles Department of Transportation (LADOT) to ensure that appropriate analysis methodologies and assumptions were utilized. Based on LADOT’s recommendations, the traffic study evaluates the existing (year 2014) and forecast future (year 2016) conditions at 10 signalized study intersections and one non-signalized intersection. The analyzed locations correspond to locations where potential traffic impacts from the Project are most likely to occur. The intersections identified for analysis are shown on Figure IV-6 and are as follows:

- 7th Street & Mateo Street
- 6th Street & Mateo Street
- 4th Street & Molino Street
- 4th Street & Anderson Street
- 4th Street & Gless Street
- 3rd Street & Alameda Street
- 4th Street & Alameda Street

- 6th Street & Alameda Street
- 7th Street & Alameda Street
- 7th Street & Santa Fe Avenue
- Palmetto Street & Mateo Street (non-signalized)

The existing lane configurations for these analyzed intersections are shown on Figure IV-7.

Existing Conditions

Intersections

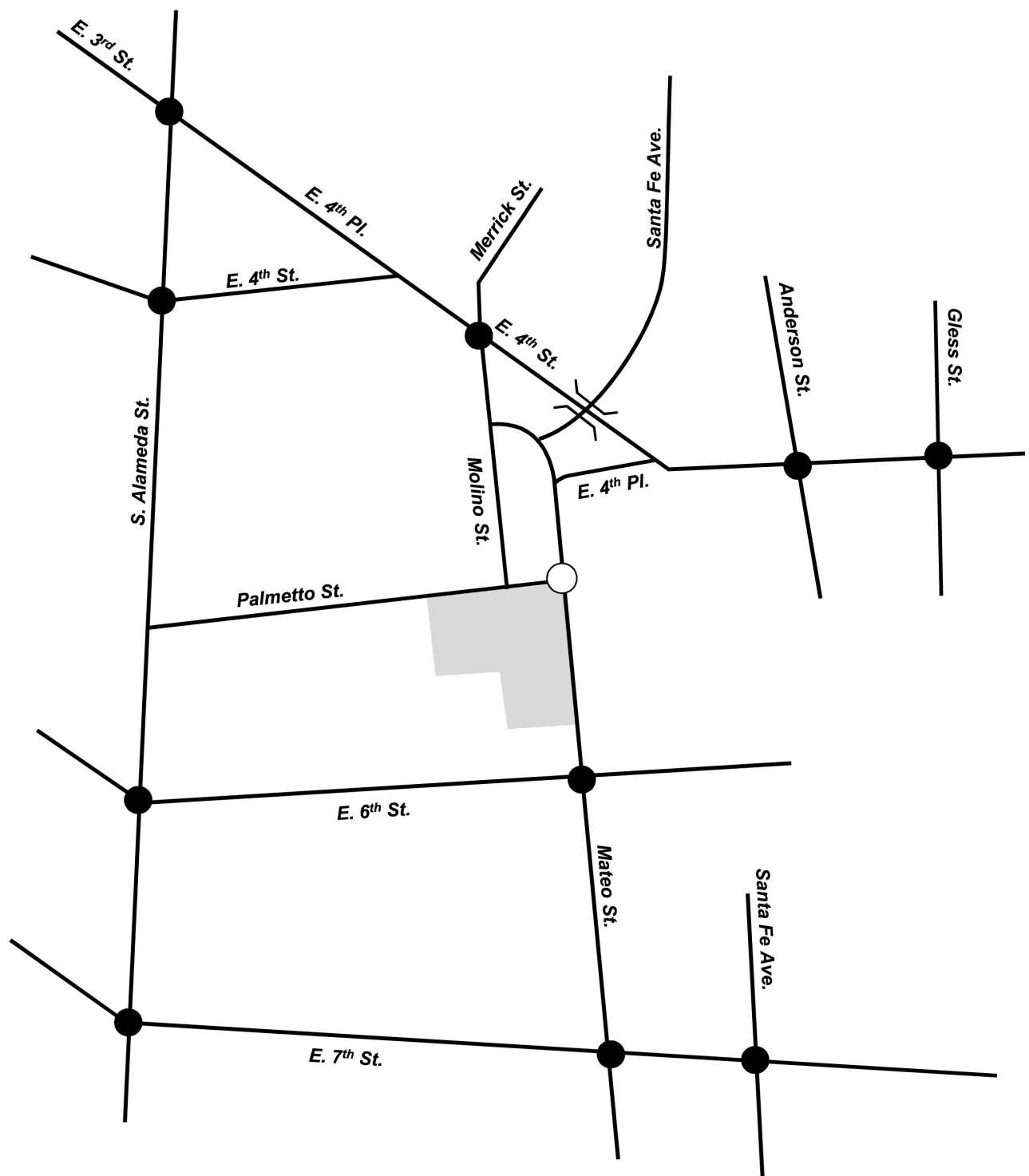
Intersection turning movement counts at the study intersections were conducted by City Count, LLC on Tuesday, October 14, 2014. Traffic volumes were collected from 7:00 to 10:00 a.m. and from 3:00 to 6:00 p.m. at all signalized intersections. The Palmetto Street intersection with Mateo Street was counted from 6:00 a.m. to 7:00 p.m. (traffic count data is presented in Appendix B of the Traffic Study, which is located in Appendix F to this IS/MND).

Based on the collected traffic data, the peak traffic hours were identified as follows:

- Weekday morning: 7:30 to 8:30 a.m.
- Weekday evening: 5:00 to 6:00 p.m.

The existing peak traffic hours are expected to coincide with the peak traffic hours of the proposed Project. The Year 2014 existing traffic peak hour volumes, which include traffic from the existing light industrial land uses on the proposed site, are shown on Figure IV-8 and listed in Table IV-29.

Table IV-32 summarizes the existing AM and PM peak hour V/C ratios and corresponding levels of service at the analyzed intersections. As shown in Table IV-32, all of the study intersections currently operate at LOS B or better during the weekday AM and PM peak periods.



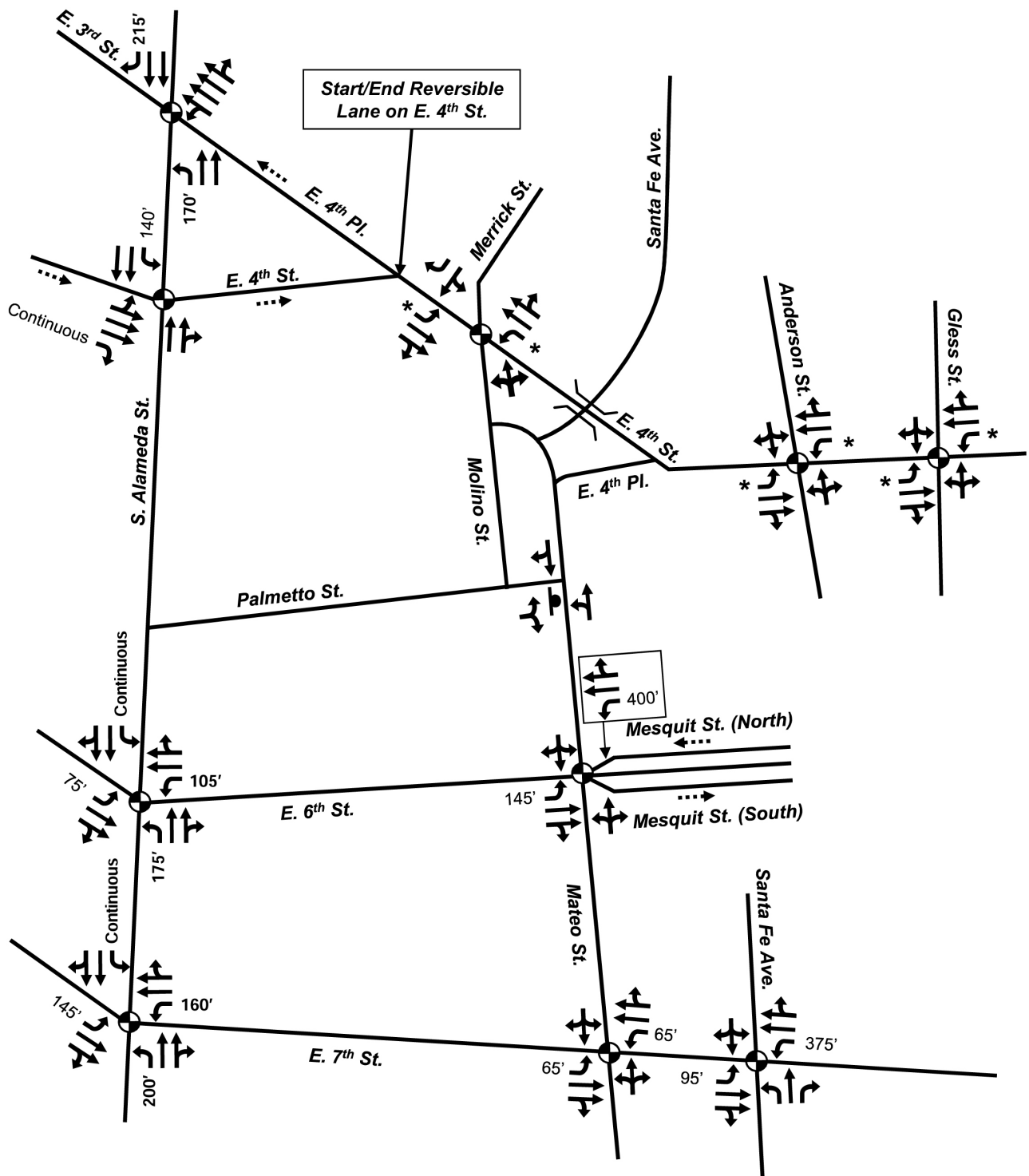
Legend

- = Proposed Development
- = Study Intersection
- = Traffic Signal Warrant Analysis Only

Source: R.A. Smith National, Inc. 2/6/15.



Not to Scale



Start/End Reversible Lane on E. 4th St.

Legend			
←...	= One Way Street	XX'	= Turn Bay Length
←	= Travel Lane	⊕	= Traffic Signal
*	= Reversible Lane (Continuous)	⊖	= Stop Sign

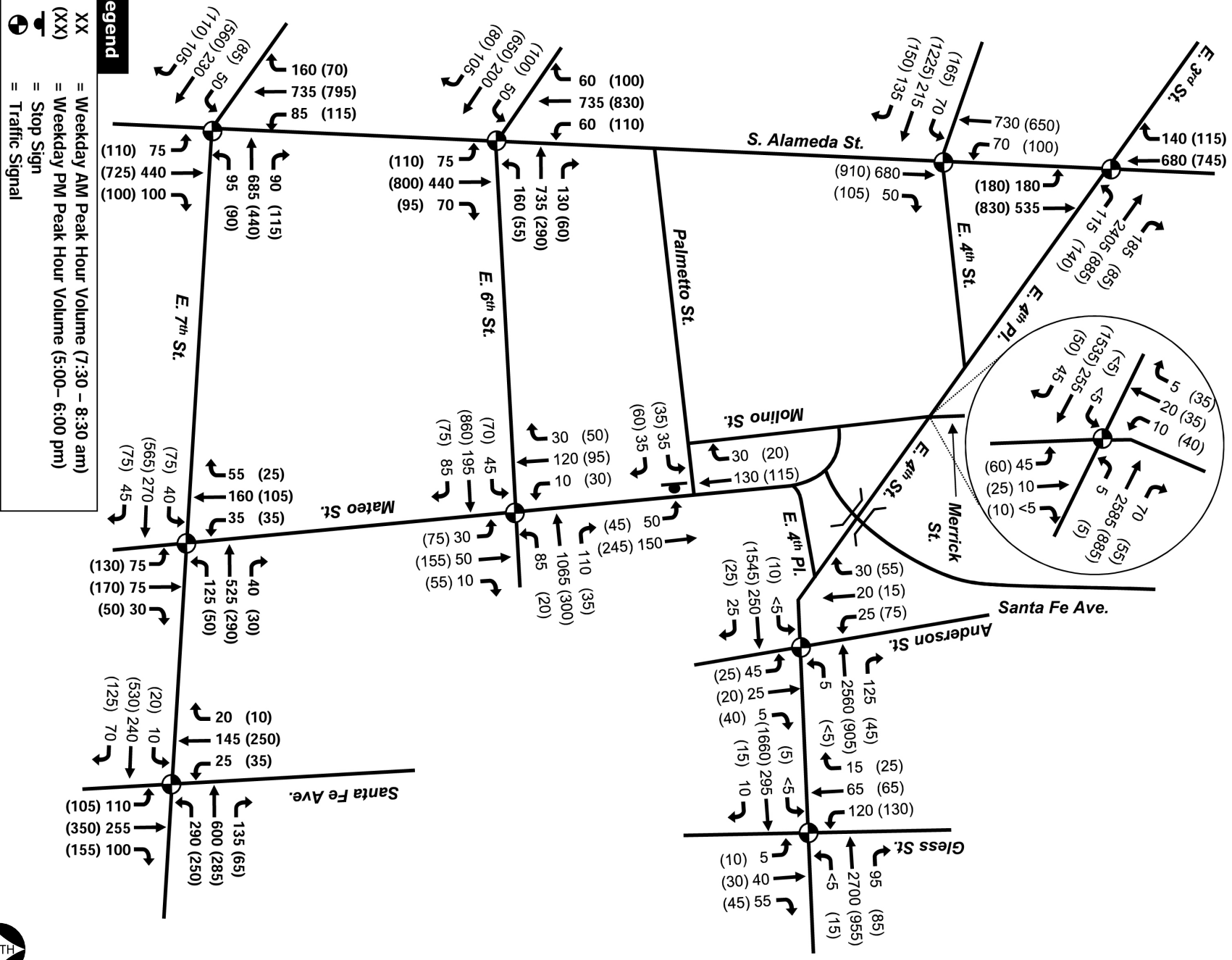
Source: R.A. Smith National, Inc. 2/6/15.



Not to Scale

Table IV-32
Existing (2014) Intersection Level of Service

Intersection	Traffic Control	Peak Hour	Level of Service	Volume / Capacity Ratio
S. Alameda Street with E. 3 rd Street	Traffic Signal	AM	B	0.697
		PM	A	0.454
S. Alameda Street with E. 4 th Street	Traffic Signal	AM	A	0.280
		PM	B	0.614
S. Alameda Street with E. 6 th Street	Traffic Signal	AM	A	0.537
		PM	A	0.563
S. Alameda Street with E. 7 th Street	Traffic Signal	AM	A	0.574
		PM	A	0.579
E. 4 th Street with Molino Street/Merrick Street	Traffic Signal	AM	A	0.586
		PM	A	0.393
E. 4 th Street with Anderson Street	Traffic Signal	AM	A	0.578
		PM	A	0.375
E. 4 th Street with Gless Street	Traffic Signal	AM	B	0.673
		PM	A	0.442
Mateo Street with E. 6 th Street	Traffic Signal	AM	A	0.478
		PM	A	0.464
Mateo Street with E. 7 th Street	Traffic Signal	AM	A	0.355
		PM	A	0.430
E. 7 th Street with Santa Fe Avenue	Traffic Signal	AM	A	0.423
		PM	A	0.586
Source: R.A. Smith National, Inc. (2015).				



Source: R.A. Smith National, Inc. 2/6/15.



Transit Service

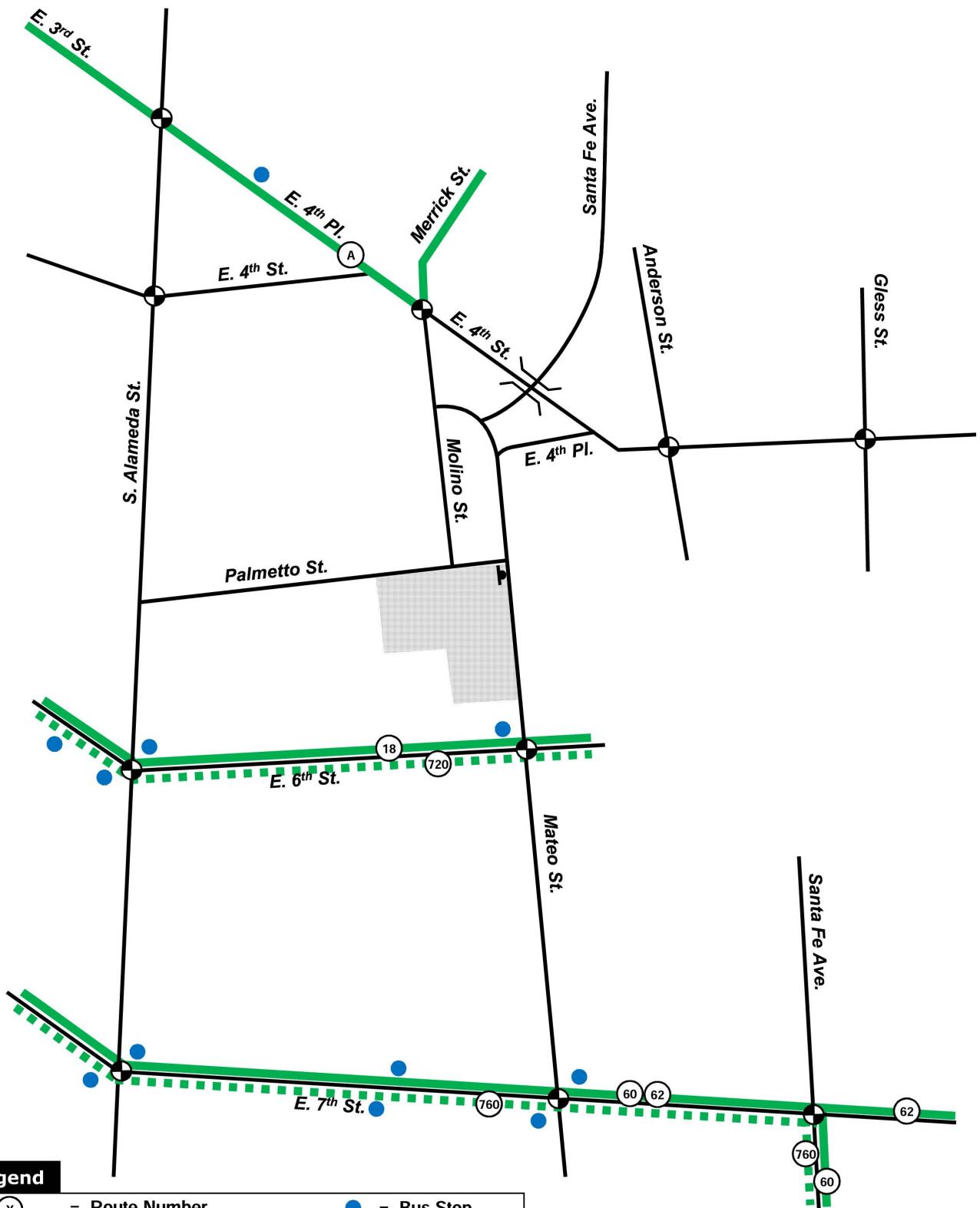
The Project area is served by several public bus routes operated by the Los Angeles County Metropolitan Transportation Authority (Metro). Two of these routes are Rapid Bus Routes, which feature fewer stops, frequent service, and bus signal priority. The following bus routes are included in the study area.

- Route 18 (6th Street – Local)
- Route 60 (7th Street/Santa Fe Avenue – Local)
- Route 62 (7th Street – Local)
- Route 720 (6th Street – Rapid Bus)
- Route 760 (7th Street – Rapid Bus)
- DASH A (4th Street – Local/Downtown)

A transit service map highlighting all bus routes servicing the area is shown in Figure IV-9. Specific route limits and service frequencies are summarized in Table IV-33.

Table IV-33
Transit Service Frequency and Route Limits

Bus Route	Route Type	Primary Direction	Service Frequency (minutes)								Route Limits
			Weekday			Saturday		Sunday			
			Peaks	Day	Eve	Day	Eve	Day	Eve		
A	DASH	East/West	7	7	7	-	-	-	-	Witmer Street (West) to Merrick Street (East)	
18	Local	East/West	3-8	10	20-60	5-15	15-60	10-15	15-60	Western Street (West) to Flotilla Street (East)	
60	Local	North/South	6-7	12-15	20-60	8-15	20-60	10-12	20-60	W. Cesar E Chavez Avenue (North) to E. 1 st Street (South)	
62	Local	North/South	15-40	30-32	30-60	40-60	60	45-60	50-60	S. Beaudry Avenue (North) to 226 th Street (South)	
720	Rapid Bus	East/West	2-10	7-8	8-20	6-12	10-20	8-12	10-20	Ocean Avenue (West) to S. Gerhart Avenue (East)	
760	Rapid Bus	North/South	8-20	30	23-27	30	-	-	-	S. Beaudry Aveue (North) to I-105 (South)	
- Indicates no service provided at the time Peaks: 6 am – 9 am / 3 pm – 6 pm Source: LA Metro											



Legend	
(X)	= Route Number
- - -	= Metro Rapid Bus Route
—	= Metro/Dash Local Bus Route
■	= Proposed Development
●	= Bus Stop
T	= Stop Sign
⦿	= Traffic Signal

Source: R.A. Smith National, Inc. 2/6/15.



Not to Scale

Pedestrian and Bicycle Facilities

Sidewalks are generally provided along either one or both sides of all of the study roadways. In close proximity to the site, a sidewalk is provided along the north side of Palmetto Street and along both the east and west sides of Mateo Street. Within the study area, marked bicycle facilities are provided westbound along 3rd Street, west of Alameda Street. The 2010 LADOT Bicycle Plan indicates the following bikeway networks are present/planned within the study area:

- Mateo Street (Neighborhood Bikeway)
- Santa Fe Avenue (Neighborhood Bikeway)
- 6th Street (Backbone Bikeway)
- 7th Street (Backbone Bikeway)

No other bicycle facility descriptions or designated bike paths are noted within the study area.

Future Conditions without Project

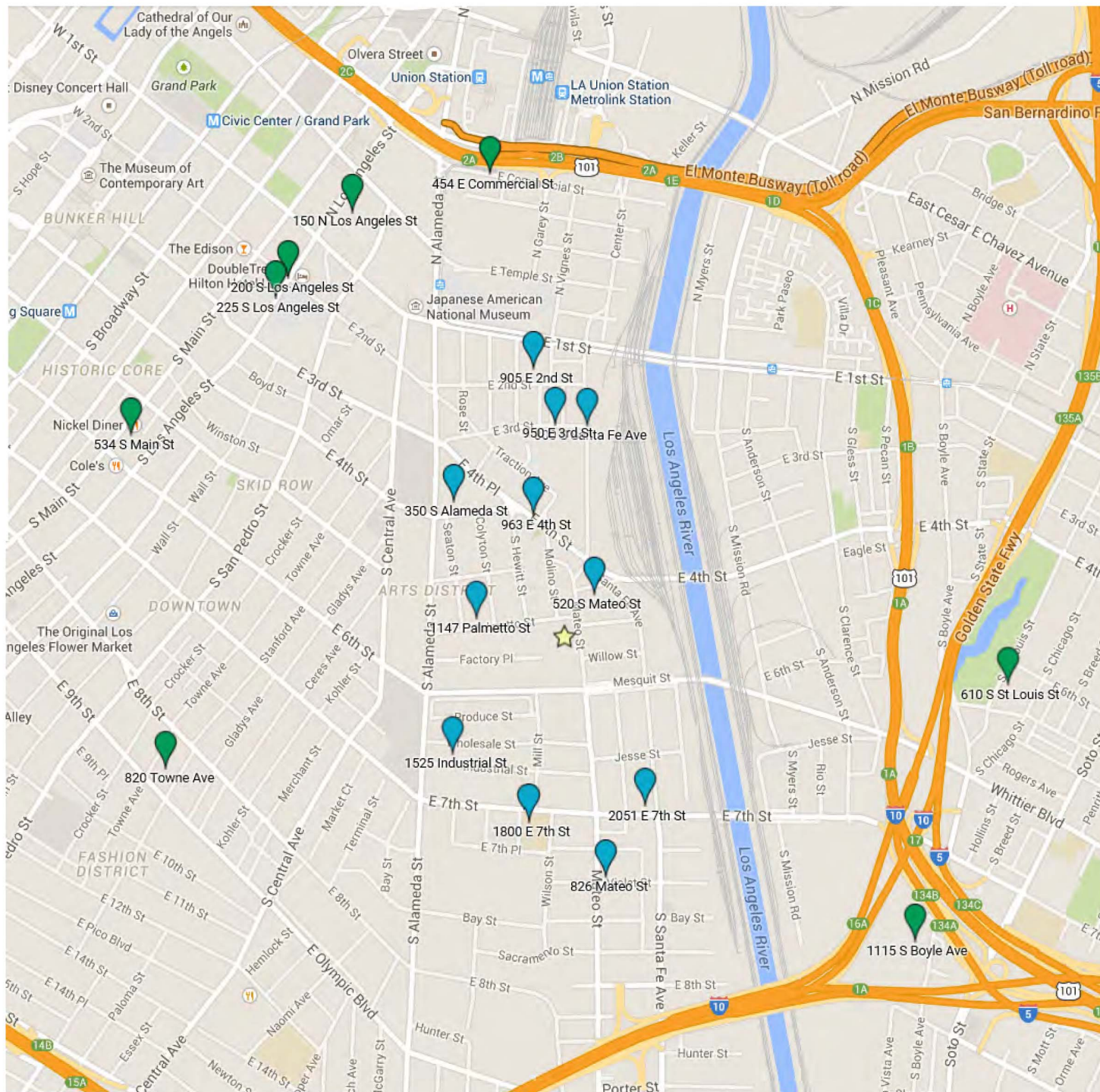
Cumulative Traffic Forecasts

The existing traffic volumes were forecasted for future year (2016) conditions. In agreement with LADOT, an ambient growth rate of one percent was applied to all study intersections. In addition to the ambient growth rate, traffic from cumulative development that has been proposed within the study area, as identified by LADOT, was applied to the future year traffic volumes. The locations of these 19 cumulative projects are shown on Figure IV-10. A trip generation summary for the cumulative projects is shown in Table 2 of the Traffic Study, attached as Appendix F.

Eleven of the 19 identified cumulative development projects in the area were selected for further analysis as part of the traffic study. Projected trips for each of those projects were assigned to the study intersections according to the distributions provided in each cumulative project traffic study. Trip assignments for each project are provided in Appendix D of the Traffic Study and shown in Exhibit 3-2 of the Traffic Study (see Appendix F). These traffic volumes were added to the future year (2016) traffic scenario to create the Year 2016 base traffic volumes, which are summarized in Figure IV-11.

Year 2016 Base Intersection Level of Service (Without Project)

The Year 2016 base traffic volumes were evaluated to determine the V/C ratio and LOS for the analyzed intersections for both the AM peak hour and the PM peak hour, using the existing intersection and roadway geometrics. The results of this analysis are presented in Table IV-34, which summarizes the intersection levels of service calculated for the Year 2016 base conditions. As shown in Table IV-34, all studied intersections would continue to operate at LOS C or better during the AM peak hour and all studied intersections would operate at LOS B or better during the PM peak hour without the proposed Project.



Source: Google Maps

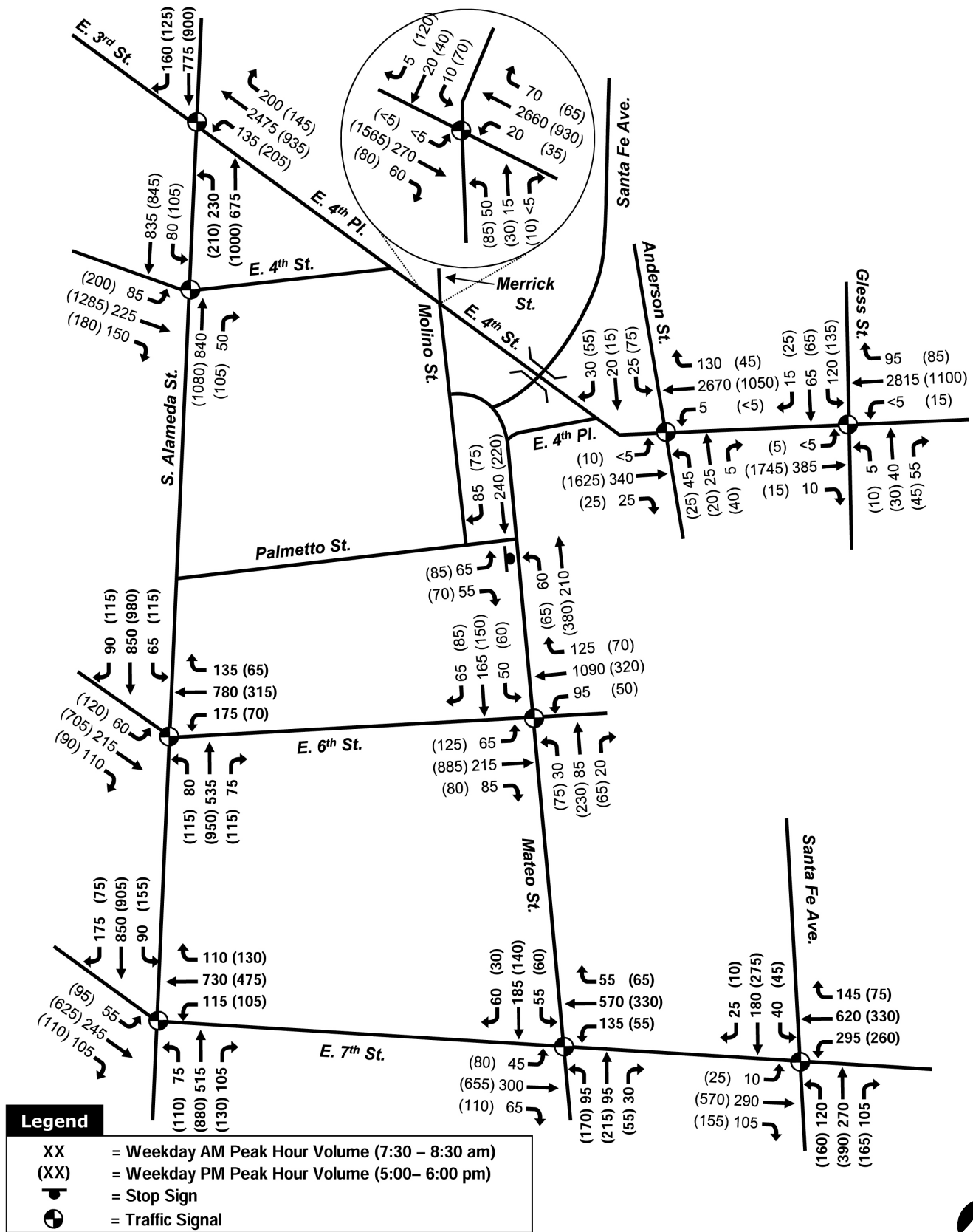
Legend

-  = Related Project Location (Included in Analysis)
-  = Related Project Location (Not Included in Analysis)
-  = Proposed Development

Source: R.A. Smith National, Inc. 2/6/15.



Not to Scale



Source: R.A. Smith National, Inc. 2/6/15.



Not to Scale

**Table IV-34
Year 2016 Base Traffic Level of Service**

Intersection	Traffic Control	Peak Hour	Level of Service	Volume / Capacity Ratio
S. Alameda Street with E. 3 rd Street	Traffic Signal	AM	C	0.776
		PM	A	0.553
S. Alameda Street with E. 4 th Street	Traffic Signal	AM	A	0.350
		PM	B	0.697
S. Alameda Street with E. 6 th Street	Traffic Signal	AM	B	0.615
		PM	B	0.655
S. Alameda Street with E. 7 th Street	Traffic Signal	AM	B	0.647
		PM	B	0.698
E. 4 th Street with Molino Street/Merrick Street	Traffic Signal	AM	B	0.620
		PM	A	0.487
E. 4 th Street with Anderson Street	Traffic Signal	AM	B	0.609
		PM	A	0.395
E. 4 th Street with Gless Street	Traffic Signal	AM	C	0.701
		PM	A	0.486
Mateo Street with E. 6 th Street	Traffic Signal	AM	A	0.596
		PM	A	0.577
Mateo Street with E. 7 th Street	Traffic Signal	AM	A	0.436
		PM	A	0.558
E. 7 th Street with Santa Fe Avenue	Traffic Signal	AM	A	0.504
		PM	B	0.682
Source: R.A. Smith National, Inc. (2015).				

Project Trip Generation

Trip generation for the Project was estimated using trip rates from *Trip Generation Manual – 9th Edition* (Institute of Transportation Engineers, 2012); specifically Land Use Codes 110, 710, and 820. The Project would develop 170,906 square feet of retail, office, and restaurant uses, with 3.5 levels of parking, on the Project site.

The trips generated by the Project were determined by multiplying an appropriate trip generation rate by the quantity of land use. Trip generation rates are predicated on the assumption that energy costs, the availability of roadway capacity, the availability of vehicles to drive, and life styles remain similar to what are known today. A major change in these variables may affect trip generation rates. Trip generation rates were determined for morning peak hour inbound and outbound traffic and evening peak hour inbound and outbound traffic for the proposed land uses in the Project. By multiplying the trip generation rates by the land use quantities, the traffic volumes are determined. Table IV-35 exhibits the trip generation rates, Project peak hour volumes, and Project daily traffic volumes. The Project trip distributions were provided by LADOT.

As shown in Table IV-35, the proposed Project is projected to generate a net increase of approximately 4,215 total daily vehicle trips compared to the site's current uses, 105 of which would occur during the morning peak period and 455 of which would occur during the evening peak period.

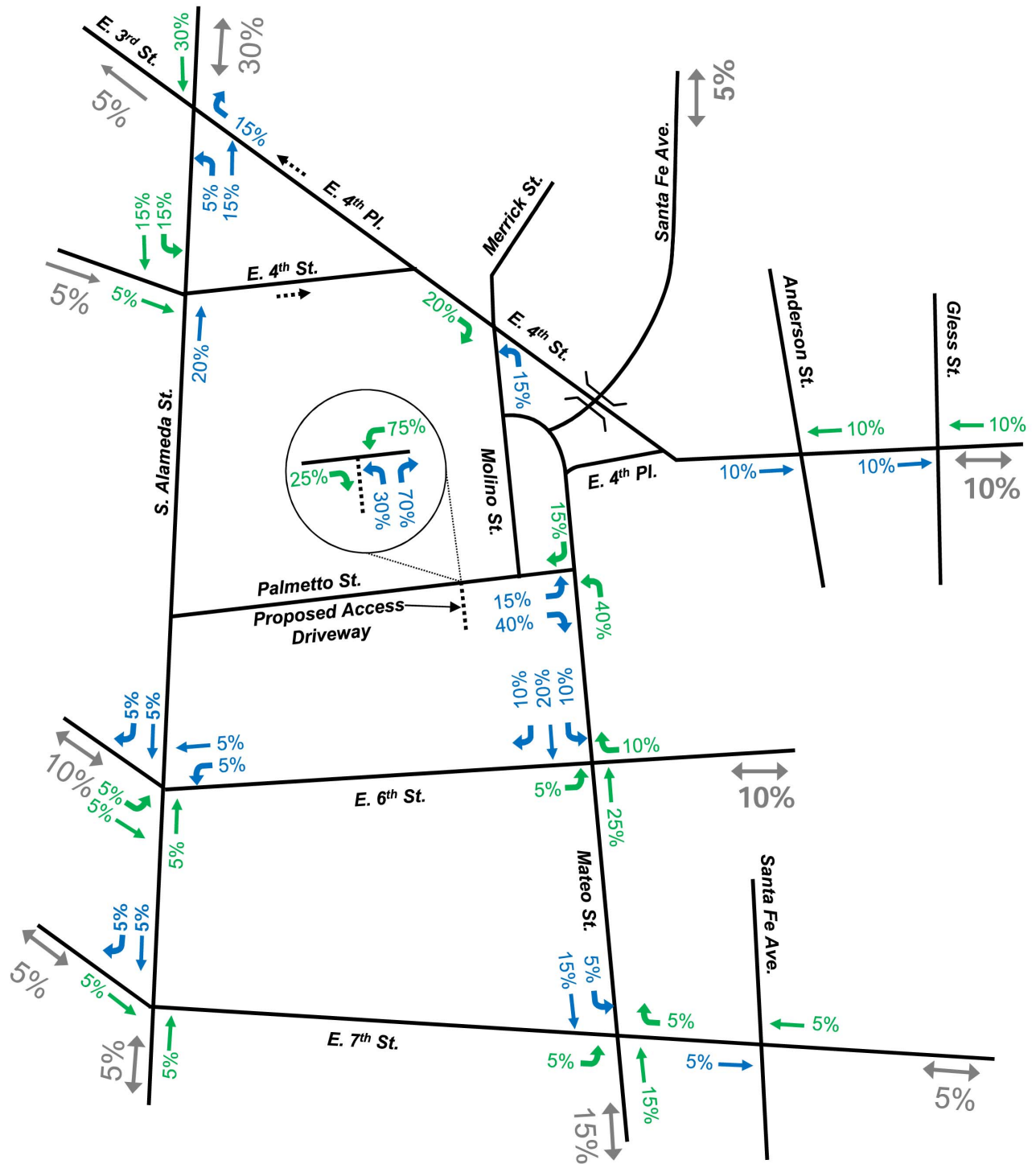
**Table IV-35
Project Trip Generation**

Land Use	ITE Code	Size (SF)	Weekday Daily Trips			Peak Hour Trips					
						AM			PM		
			In	Out	Total	In	Out	Total	In	Out	Total
Existing Land Use											
Light Industrial	110	148,000	515	515	1,030*	75	10	85	5	50	55
Proposed Land Use											
Retail/Restaurant	820	122,624	3,872	3,873	7,745	110	65	175	330	355	685
Creative Office	710	48,040	375	375	750	90	15	105	20	110	130
Transit Reduction (-15%)			(637)	(638)	(1,275)	(30)	(10)	(40)	(55)	(70)	(125)
Proposed Driveway Trips			3,610	3,610	7,220	170	70	240	295	395	690
Pass-By Trip Reduction (-30%)			(987)	(988)	(1,975)	(25)	(25)	(50)	(90)	(90)	(180)
Proposed New Trips			2,622	2,623	5,245	145	45	190	205	305	510
Additional new Trips (New Trips Less Existing)			2,107	2,108	4,215	70	35	105	200	255	455
Note: Fitted curve equation was used to calculate trip generation based on guidance outlined in the ITE Trip Generation Handbook, unless noted by (*) which indicates the average rate was used. Source: R.A. Smith National, Inc. (2015).											

Trip credits (reductions) were applied to the Project trip generation per LADOT traffic study guidelines and approval. Due to the proximity of transit stops near the site, including a Rapid Bus stop (Route #720) near the 6th Street intersection with Alameda Street and a local route bus stop (Route #18) near the 6th Street intersection with Mateo Street, a 15 percent transit credit reduction was applied.

The trip distribution pattern for the Project was developed based on the surrounding street network and general location of the development site. The approved trip distribution pattern used in this analysis is provided below and shown on Figure IV-12:

- Alameda Street to/from the north: 30%
- Alameda Street to/from the south: 5%
- 3rd Street to the west: 5%
- 4th Street from the west: 5%
- 4th Street to/from the east: 10%
- 6th Street to/from the west: 10%
- 6th Street to/from the east: 10%
- 7th Street to/from the west: 5%
- 7th Street to/from the east: 5%



Source: R.A. Smith National, Inc. 2/6/15.



Not to Scale

- Santa Fe Avenue to/from the north: 5%
- Mateo Street to/from the south: 15%

New trips generated by the Project were assigned to the study area intersections based on the directional distributions. In addition to the transit credit reduction, a 30 percent pass-by trip reduction was used for the proposed development per LADOT guidelines for retail developments between 100,000 and 300,000 square feet in size. Pass-by trips were calculated from Alameda Street and 6th Street to account for a higher likelihood of existing trip diversion from these roadways (referred to as diverted linked trips). The new development trips were added to the diverted linked/pass-by trips to determine the development driveway trips. The total Project traffic volumes were developed by subtracting the existing industrial use trips (Exhibit 3-8 in the Traffic Study) from the new development driveway trips (Exhibit 3-7 in the Traffic Study), and are shown on Figure IV-13.

Project Impacts

Traffic generated by the Project was added to the 2014 existing traffic volumes to obtain 2014 total traffic volumes and was added to the 2016 base without Project traffic volumes to obtain 2016 total traffic volumes with the Project for both peak periods at each of the study intersections.

Existing (2014) Total Traffic (With Project)

Table IV-36 summarizes the total traffic level of service for the existing (2014) with Project conditions at the analyzed intersections for the AM and PM peak hours. As shown in Table IV-36, all intersections would operate at LOS C or better during the weekday AM and PM peak periods and the addition of Project traffic would not cause any increases in volume/capacity (V/C) ratios that would exceed the threshold for a significant impact to occur (thresholds are presented in Table IV-31).

Table IV-36
Year 2014 Total Traffic Level of Service

Intersection	Traffic Control	Peak Hour	Level of Service	Volume/Capacity Ratio	Change in V/C from 2014 Existing Condition	Significant Impact?
S. Alameda Street with E. 3 rd Street	Traffic Signal	AM	C	0.701	0.004	No
		PM	A	0.487	0.033	No
S. Alameda Street with E. 4 th Street	Traffic Signal	AM	A	0.280	0.000	No
		PM	B	0.651	0.037	No
S. Alameda Street with E. 6 th Street	Traffic Signal	AM	A	0.539	0.002	No
		PM	A	0.591	0.028	No
S. Alameda Street with E. 7 th Street	Traffic Signal	AM	B	0.574	0.000	No
		PM	B	0.590	0.011	No
E. 4 th Street with Molino Street/Merrick Street	Traffic Signal	AM	B	0.590	0.004	No
		PM	A	0.428	0.035	No
E. 4 th Street with Anderson Street	Traffic	AM	B	0.581	0.000	No

	Signal	PM	A	0.375	0.005	No
E. 4 th Street with Gless Street	Traffic Signal	AM	B	0.673	0.00	No
		PM	A	0.447	0.005	No
Mateo Street with E. 6 th Street	Traffic Signal	AM	B	0.500	0.022	No
		PM	B	0.525	0.061	No
Mateo Street with E. 7 th Street	Traffic Signal	AM	A	0.355	0.000	No
		PM	A	0.458	0.028	No
E. 7 th Street with Santa Fe Avenue	Traffic Signal	AM	A	0.425	0.002	No
		PM	B	0.588	0.002	No
Source: R.A. Smith National, Inc. (2015).						

Future (2016) Total Traffic (With Project)

Table IV-37 summarizes the total traffic level of service for the future (2016) with Project conditions at the analyzed intersections for the AM and PM peak hours. These conditions are also shown on Figure IV-14. The analysis summarized in Table IV-37 shows that all intersections would operate at LOS C or better during the weekday AM and PM peak periods and the addition of Project traffic would not cause any increases in volume/capacity (V/C) ratios that would exceed the threshold for a significant impact to occur (thresholds are presented in Table IV-31). Therefore, the Project would not cause any significant traffic impacts at the signalized intersections in the Project area in either the AM or PM peak hour.

Table IV-37
Year 2016 Total Traffic Level of Service

Intersection	Traffic Control	Peak Hour	Level of Service	Volume/ Capacity Ratio	Change in V/C from 2014 Existing Condition	Significant Impact?
S. Alameda Street with E. 3 rd Street	Traffic Signal	AM	C	0.787	0.011	No
		PM	A	0.589	0.036	No
S. Alameda Street with E. 4 th Street	Traffic Signal	AM	A	0.357	0.007	No
		PM	C	0.736	0.039	No
S. Alameda Street with E. 6 th Street	Traffic Signal	AM	B	0.620	0.005	No
		PM	B	0.685	0.030	No
S. Alameda Street with E. 7 th Street	Traffic Signal	AM	B	0.647	0.000	No
		PM	C	0.705	0.007	No
E. 4 th Street with Molino Street/Merrick Street	Traffic Signal	AM	B	0.627	0.007	No
		PM	A	0.519	0.032	No
E. 4 th Street with Anderson Street	Traffic Signal	AM	B	0.610	0.001	No
		PM	A	0.401	0.006	No
E. 4 th Street with Gless Street	Traffic Signal	AM	C	0.703	0.002	No
		PM	A	0.493	0.007	No
Mateo Street with E. 6 th Street	Traffic Signal	AM	B	0.621	0.020	No
		PM	B	0.640	0.063	No
Mateo Street with E. 7 th Street	Traffic Signal	AM	A	0.445	0.009	No
		PM	A	0.586	0.028	No

E. 7 th Street with Santa Fe Avenue	Traffic Signal	AM	A	0.505	0.001	No
		PM	B	0.685	0.003	No
Source: R.A. Smith National, Inc. (2015).						

Traffic Signal Warrant Analysis

A traffic signal warrant analysis was conducted at the Palmetto Street (west leg) intersection with Mateo Street. As directed by LADOT, R.A. Smith National compared the major and minor approach volumes to the volume required by the peak hour signal warrant (Warrant 3) found in the *Manual on Uniform Traffic Control Devices (MUTCD), 2009 Edition and 2014 California MUTCD Supplement*. An exclusive eastbound right-turn lane is proposed to be installed as part of the Project improvements and minimal conflict is anticipated for right-turning vehicles based on the low southbound through traffic volumes on Mateo Street. Therefore, right-turn volumes were not included on the minor street approach. The analysis (shown on Exhibit 4-4 of the Traffic Study in Appendix F) indicates the peak hour warrant will not be met under Year 2016 Total Traffic conditions. Both the weekday morning and weekday evening peak hour volumes would fall well below the applicable MUTCD thresholds specified. The peak hour volumes also would not meet the California MUTCD volume criteria found in Part A of Warrant 3 (see Traffic Signal Warrants Worksheet in Appendix E of the Traffic Study). Therefore, traffic signals are not recommended at the Palmetto Street/Mateo Street intersection as a result of Project traffic impacts.

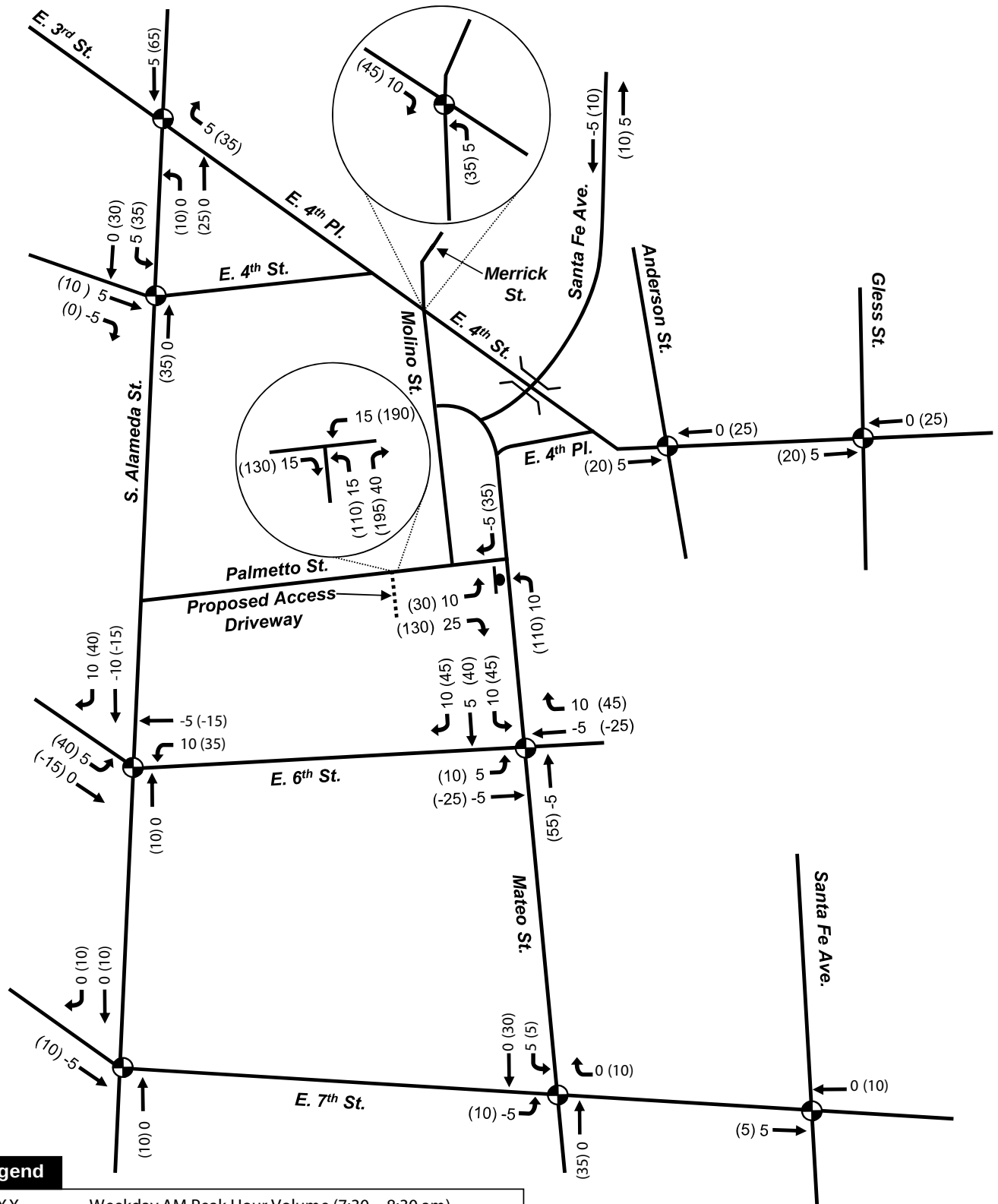
Parking

To accommodate parking demand for the Project, a new 540-space parking structure is proposed in Project Building 4. Access to the parking structure is proposed 330 feet west of Mateo Street on Palmetto Street. City parking code requirements for the site, currently zoned M3-1-RIO (industrial) and within an Enterprise Zone, are 2.0 spaces per 1,000 square feet. For the 170,906-square foot proposed development, a minimum of 342 parking spaces is required. Therefore, the Project exceeds City parking requirements by 198 spaces. The Project requires 67 short term and 72 long term bicycle parking spaces, and the Project will provide 69 short term and 76 long term bicycle parking spaces. Additional nearby on-street parking is expected to remain along the north side of Palmetto Street and along both sides of Mateo Street.

Transportation System Improvements

Although no significant traffic impacts were determined at the study intersections, the following improvements are recommended at the intersection of Palmetto Street and Mateo Street to improve safety and enhance operations near the Project site:

- Maintain one-way stop control on the Palmetto Street (west) approach



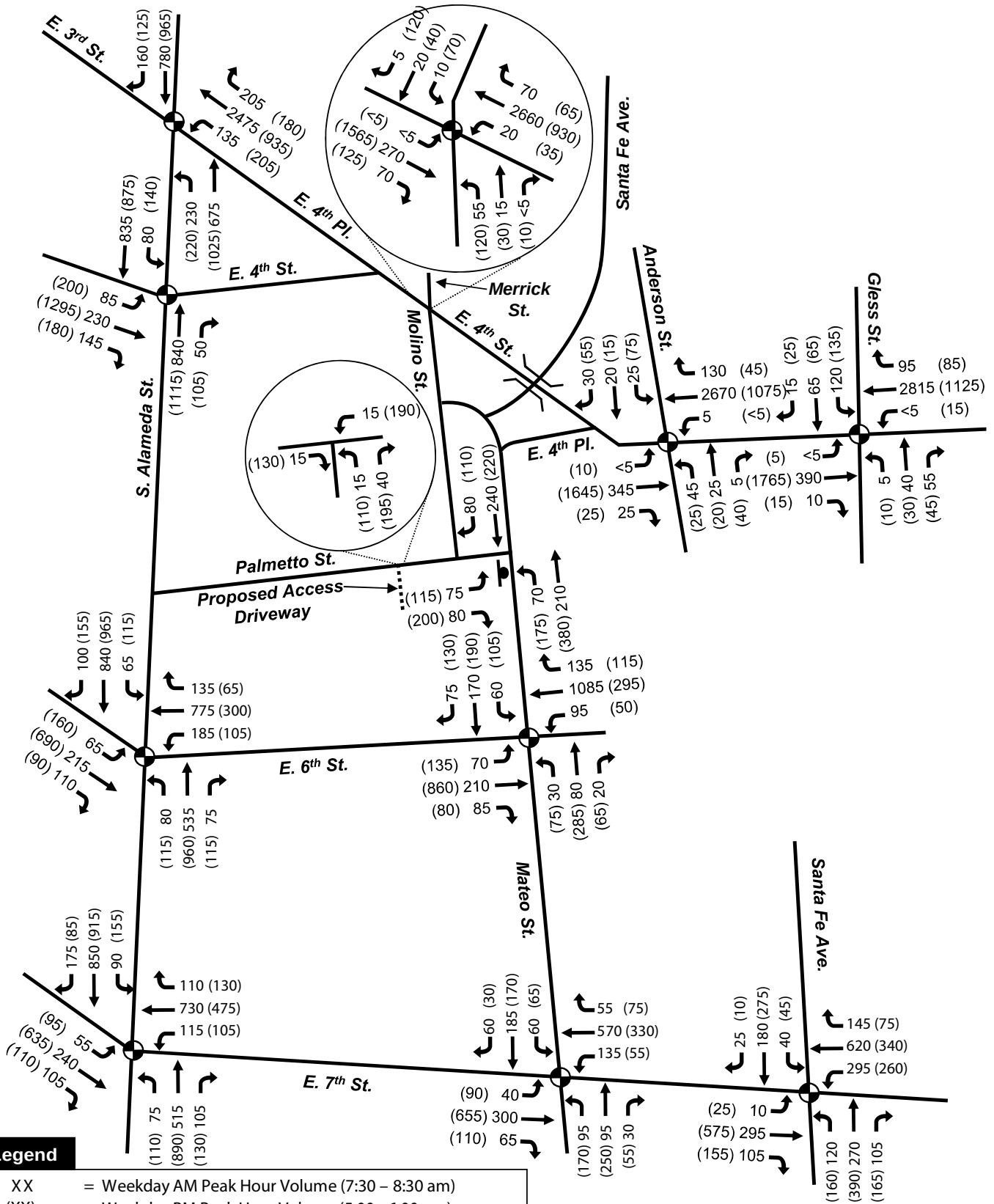
Legend

- XX = Weekday AM Peak Hour Volume (7:30 – 8:30 am)
- (XX) = Weekday PM Peak Hour Volume (5:00– 6:00 pm)
- ⊥ = Stop Sign
- ⊙ = Traffic Signal

Source: R.A. Smith National, Inc. 2/6/15.



Not to Scale



Year 2016 Total



Not to Scale

Source: R.A. Smith National, Inc. 2/6/15.

Provide an exclusive eastbound left-turn and an exclusive right-turn lane on the west portion of Palmetto Street. The eastbound right-turn lane should be marked for a minimum of 100 feet from the eastbound stop bar.

- Remove parking along the south side of Palmetto Street immediately west of Mateo Street to accommodate the eastbound right-turn lane.
- Remove parking on the east side of Mateo Street near the intersection to accommodate northbound through traffic bypassing left-turning vehicles.

In addition, the following pedestrian and bicycle-transit measures are proposed to be implemented:

- Provide connections between the existing sidewalks and the proposed Project.
- Site design features such as improved lighting and sidewalk connectivity to the extent possible to promote transit use and improve accessibility.

LADOT has concurred with these recommended improvements (see Appendix F). Figures IV-15 and IV-16 provide illustrations of the recommended Project transportation system improvements.

CMP and Freeway Analysis

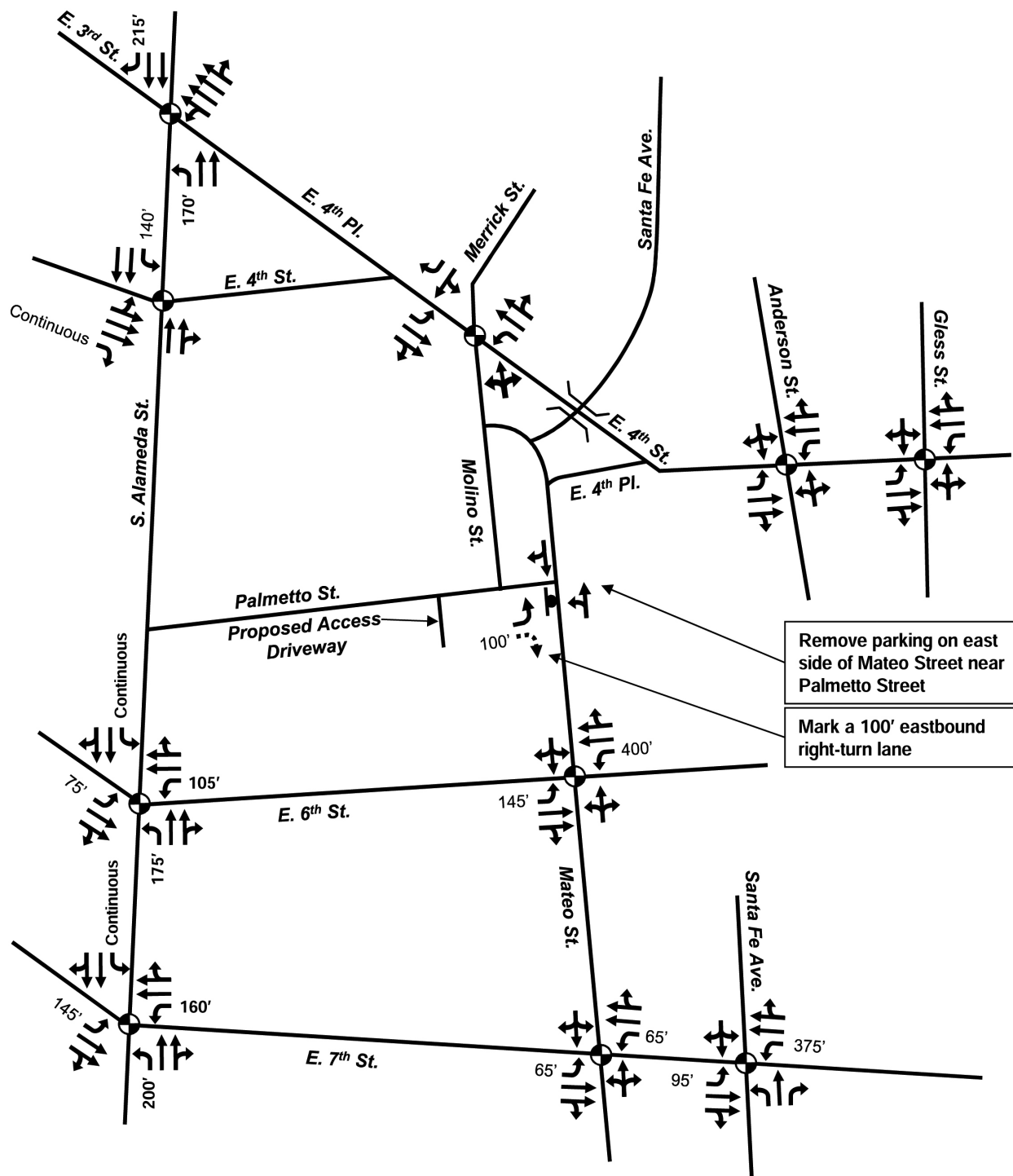
The Los Angeles County Congestion Management Program (CMP) requires that new development projects analyze potential project impacts on CMP monitoring locations if an EIR is prepared for a project. As an EIR is not being prepared for this Project, no CMP analysis is required. Nonetheless, a CMP analysis was conducted for the Project as part of the Traffic Study.

CMP Monitoring Intersections

There is one CMP monitoring intersection located within a two-mile radius of the proposed Project (Alameda Street and Washington Boulevard). The intersection is located south of the Santa Monica Freeway (I-10) in the southern part of the two-mile study perimeter. According to 2010 CMP Guidelines, a project would have a significant impact on the CMP intersection if 50 or more development-related trips would be added to the intersection during the weekday morning or weekday evening peak hours. As shown in Figure IV-13, a total of 10 project trips are estimated to use Alameda Street south of 7th Street during the weekday evening peak hour and potentially pass through the Washington Boulevard intersection. Therefore, the Project would not have a significant impact on this CMP intersection.

Freeway Impact Screening

Per direction from LADOT, a freeway impact screening was performed to conform to CMP guidelines and determine if other agency involvement (Caltrans) would be required as part of the traffic study review process. A project would have a significant impact on the freeway system if any of the following criteria would be met:



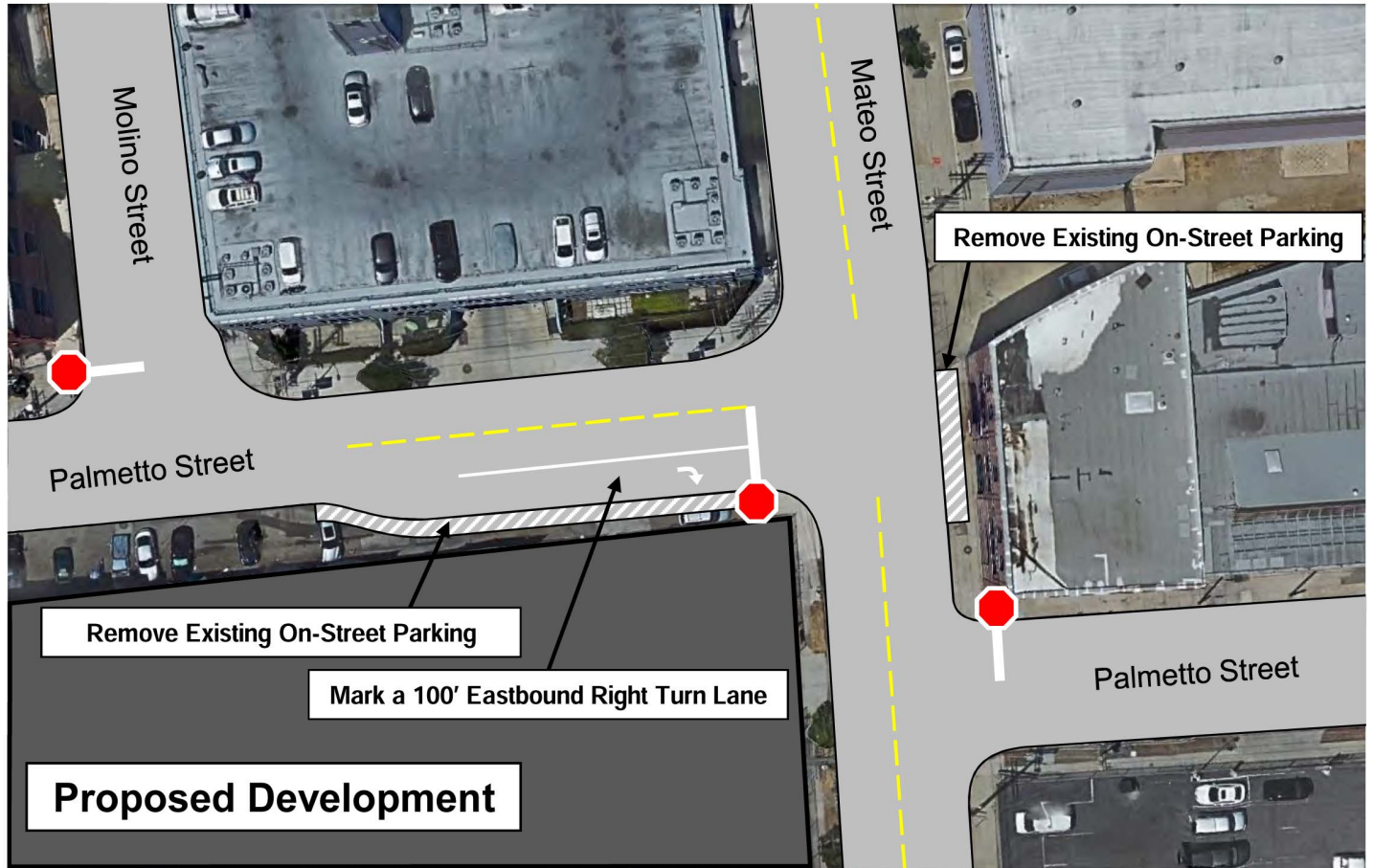
Legend

- ← = Travel Lane
- ←... = Recommended Improvement
- XX' = Turn Bay Length
- ⊙ = Traffic Signal
- ⬮ = Stop Sign

Source: R.A. Smith National, Inc. 2/6/15.



Not to Scale



Legend

↱ = Right-Turn Arrow Marking



= Stop Sign



= Remove Parking

Source: R.A. Smith National, Inc. 2/6/15.



Not to Scale

The project's peak hour trips result in a one percent or more increase to the freeway mainline volume of a freeway segment operating at Level of Service (LOS) E or F, based on an assumed capacity of 2,000 vehicles per hour per lane (vphpl); or

1. The project's peak hour trips result in a two percent or more increase to the freeway mainline volume of a freeway segment operating at LOS D, based on an assumed capacity of 2,000 vphpl; or
2. The project's peak hour trips result in a one percent or more increase to the freeway off-ramp volume operating at LOS E or F, based on an assumed capacity of 1,500 vphpl; or
3. The project's peak hour trips result in a two percent or more increase to the freeway off-ramp volume operating at LOS D, based on an assumed capacity of 1,500 vphpl.

Specific trip assignments were applied to the following interchanges:

- US-101 (Santa Ana Freeway) and Alameda Street
- I-10 (Santa Monica Freeway) and Mateo Street
- US-101 (Santa Ana Freeway) and 4th Street
- I-5/I-10 (Golden State Freeway) and 4th Street

For purposes of the analysis, the one percent volume increase thresholds (Criteria 1 and 3) were used as a conservative measure to compare to the most congested freeway conditions. The analysis focused on the weekday evening peak hour due to the significantly higher Project traffic generated in comparison to the weekday morning peak hour. A summary of this analysis is shown in Tables IV-38 and IV-39 for freeway facilities and freeway off-ramp facilities, respectively. As shown in Tables IV-38 and IV-39, Project-generated trips are not expected to exceed the minimum screening criteria for any of the freeway facilities during the weekday evening peak hour. Therefore, additional freeway impact analysis and coordination with Caltrans is not required for the Project.

Table IV-38
Mainline Freeway Impact Analysis Screening - Weekday PM Peak Hour

Location	DIR	Number of Lanes	Capacity (vphpl)	Project Trips	Maximum Volume Increase	Freeway Mainline Trip Threshold	Threshold Met?
US-101 West of Los Angeles St.	SB	4	8,000	25	1%	80	No
	NB	4	8,000	23	1%	80	No
US-101 East of Center St.	SB	2 + 3A	7,000	12	1%	70	No
	NB	4 + 1A	9,000	13	1%	90	No
I-10 West of Mateo St.	EB	2 + 3A + 1C-D	8,000	10	1%	80	No
	WB	5 + 1A	11,000	10	1%	110	No
I-10 East of Santa Fe Ave	EB	2 + 3A + 2C-D	11,000	10	1%	110	No
	WB	5 + 2A	12,000	15	1%	120	No
US-101 South at E. 4 th St	NB	3	6,000	10	1%	60	No
	SB	3	6,000	10	1%	60	No
I-5/I-10 North at E. 4 th St	NB	4 + 2A	10,000	10	1%	100	No
	SB	5 + 1A	11,000	10	1%	110	No
A = Auxiliary Lane C-D = Collector-Distributor Roadway Source: R.A. Smith National, Inc. (2015).							

Table IV-39
Freeway Off-Ramp Impact Analysis Screening -
Weekday PM Peak Hour

Location	Number of Lanes	Capacity (vphpl)	Project Trips	Maximum Volume Increase	Freeway Off-Ramp Trip Threshold	Threshold Met?
US-101 SB Off Ramp to Los Angeles St.	1	1,500	12	1%	15	No
US-101 SB Off Ramp to Garey St.	2	3,000	13	1%	30	No
US-101 NB Off Ramp to Vignes St.	1	1,500	2	1%	15	No
US-101 NB Off Ramp to Alameda St	1	1,500	11	1%	15	No
US-101 NB Off Ramp to E. 4 th St	1	1,500	10	1%	15	No
I-5 SB Off Ramp to E. 4 th St.	1	1,500	10	1%	15	No
Source: R.A. Smith National, Inc. (2015).						

Transit Analysis

As described previously, several bus transit lines operate near the Project site. In addition, several light rail lines service downtown Los Angeles and surrounding areas within a two-mile radius of the site. The nearest light rail station is approximately 0.8 mile from the development site (Metro Gold Line – Pico/Aliso Station on East 1st Street). The 2010 CMP Guidelines provide criteria for determining the number of transit trips generated by a development. The Project is expected to generate a total of 105 new weekday morning peak hour trips and 455 new weekday evening peak hour trips. The total trips are

multiplied by a factor of 1.4 to account for total person-trips. For developments not located in commercial or residential areas, 3.5 percent of the total person-trips are assumed to use transit. A summary of these values is shown in Table IV-40. As shown in Table IV-40, a total of 27 transit trips are expected to be generated by the Project in the weekday evening peak hour.

Table IV-40
Transit Impact Analysis: Total Transit Trips

	Weekday AM Peak Hour	Weekday PM Peak Hour
Total Additional (New) Project Trips	105	455
Total Person-Trips (x 1.4)	147	637
Total Transit Trips (3.5%)	5	22
No. of Area Bus Routes	6	
Total Trips per Route	0.3	3.5
<i>Source: R.A. Smith National, Inc. (2015).</i>		

With a total of six bus routes operating near the site, approximately 4 to 5 additional trips would be generated per route on the existing transit system by the Project. This would not be considered a significant impact due to the low number of expected trips and frequency/capacity of service (most routes in the area operate with 5-10 minute headways during the peak hours). Therefore, no significant transit impacts are expected.

Construction Traffic

The Project would require the use of haul trucks during site clearing and excavation and the use of a variety of other construction vehicles throughout the construction work at the site. Included in this would be approximately 47 truck trips required to dispose of the excavated contaminated soil to be removed from the Project site. Construction traffic would also include the private vehicles of workers accessing the site on a daily basis. The addition of these vehicles onto the street system would contribute to increased traffic in the Project vicinity on a short-term basis during the construction of the Project. As noted in the Project Description (see Section II of this IS/MND), however, the haul trucks would travel along established traffic corridors noted in the haul route application, such as S. Alameda Street and 6th Street. The haul trips would occur outside of the peak hours and during the permissible hauling hours identified in the haul route to be approved by the Department of Building and Safety. The Project's construction trip traffic would be a fraction of the operational traffic that would not cause any significant impacts at the studied intersections. Therefore, it is not anticipated that they could contribute to a significant increase in the overall congestion in the Project vicinity. In addition, any truck trips would be limited to the length of time required for the Project's construction, with the hauling of excavated soil expected to require approximately five days. Due to the off-peak and temporary nature of the traffic, construction impacts would be less than significant.

Mitigation Measures:**16-1 Transportation/Traffic (Operation)**

- All measures detailed in the Department of Transportation's communication to the Planning Department, dated February 9, 2015, and included in Appendix F to this IS/MND shall be implemented and complied with. Such communication and mitigation measures are incorporated herein by reference.
- Adjacent sidewalks shall remain open and unobstructed during the demolition and construction phase of the Project. Permits shall be obtained from the Bureau of Street Services prior to the closure of any adjacent sidewalks and/or construction of protection fences or canopies within the public rights-of-way. Protection of pedestrian access shall be provided pursuant to LAMC Section 91.3306.

b) Would the project conflict with an applicable congestion management program, including but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

No Impact. As previously discussed in 16(a), no significant Project-related impacts to the CMP would occur. The Project would not conflict with any travel demand measures. Therefore, no impacts related to congestion management programs and other standards would occur.

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. This question would apply to the Project only if it involved an aviation-related use or would influence changes to existing flight paths. The Project site does not contain any aviation-related uses and the Project does not include development of any aviation-related uses. As such, due to its nature and scope, development of the Project would not have the potential to result in a change in air traffic patterns. Therefore, no impact related to air traffic patterns would occur.

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

Less Than Significant Impact. A significant impact may occur if a project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions. The Project would not include unusual or hazardous design features. However, the Project will include a new vehicular access driveway, which, if not properly designed and constructed, could potentially conflict with pedestrian

circulation in the Project area. Vehicular access to the Project site will be provided via Palmetto Street. With proper site planning and implementation of Mitigation Measure 16-1 as identified above in Question 16(a), potential vehicle-pedestrian conflicts would be less than significant.

e) Would the project result in inadequate emergency access?

No Impact. A significant impact may occur if the Project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project site or adjacent uses.

As previously discussed in Section 7(h), the Project is not located in or near an adopted emergency response or evacuation plan area. Development of the Project site may require temporary and/or partial street closures due to construction activities. However, any such closures would be temporary in nature and would be coordinated with the Departments of Transportation, Building and Safety, and Public Works. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. There are no hazardous design features included in the access design or site plan for the Project that could impede emergency access. Furthermore, the Project would be subject to the plot plan review requirements of the LAFD and the LAPD to ensure that all access roads and parking areas would remain accessible to emergency service vehicles. Therefore, the Project would not be expected to result in inadequate emergency access, and no impact would occur.

f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

No Impact. A significant impact may occur if the Project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site.

The Project would not require the disruption of public transportation services or the alteration of public transportation routes. Furthermore, the Project would not interfere with any Class I or Class II bikeway systems. Since the Project would not modify or conflict with any alternative transportation policies, plans, or programs, it would have no impact on such programs.

Cumulative Impacts: Transportation and Traffic

Less Than Significant Impact. Development of the Project in conjunction with the 19 cumulative development projects would result in an increase in average daily vehicle trips and peak hour vehicle trips in the Central City area. The Project Traffic Study included both an individual and cumulative analysis because the baseline discussion is a cumulative baseline. As shown in the responses to question 13(a), cumulative impacts would be less than significant.

17. UTILITIES AND SERVICE SYSTEMS

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. A significant impact would occur if a project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board (RWQCB). Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the state, other than into a community sewer system, shall file a Report of Waste Discharge (ROWD) containing information which may be required by the appropriate Regional Water Quality Control Board. The RWQCB then authorizes an NPDES permit that ensures compliance with wastewater treatment and discharge requirements. The Los Angeles RWQCB enforces wastewater treatment and discharge requirements for properties in the Project area.

Wastewater from the Project site is conveyed via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Hyperion Treatment Plant (HTP). The HTP is a public facility and, therefore, is subject to the State's wastewater treatment requirements. The capacity of the HTP is discussed in response to 14(b) below. Wastewater from the Project site is and would continue to be treated according to the wastewater treatment requirements enforced by the Los Angeles RWQCB. Therefore, no impact would occur. The Project would not exceed the wastewater treatment requirements of the Los Angeles RWQCB. Therefore, impacts with regard to wastewater treatment requirements would be less than significant.

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project site would be exceeded.

Water Treatment Facilities and Existing Infrastructure

Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan Area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

The Los Angeles Department of Water and Power (LADWP) ensures the reliability and quality of its water

supply through an extensive distribution system that includes more than 7,100 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd). The average plant flow is approximately 450 mgd during the non-summer months and 550 mgd during the summer months, and operates at between 75 and 90 percent capacity. Therefore, the LAAFP has a remaining capacity of treating approximately 50 to 150 mgd, depending on the season.⁵⁰

As shown in Table IV-41 below, the Project would generate a net additional demand for approximately 41,876 gallons per day (gpd) of potable water, significantly below available capacity. In accordance with the *L.A. CEQA Thresholds Guide*, the base estimated water demand was based on 120 percent of the sewerage generation factors for retail and restaurant categories. Based on the estimates provided in Table IV-41, implementation of the Project is not expected to measurably reduce the LAAFP's capacity; therefore, no new or expanded water treatment facilities would be required. The Project's water consumption increase represents approximately 0.007 percent and 0.002 percent of the remaining capacity currently available at LAAFP during the summer and non-summer months, respectively. Therefore, impacts to water treatment facilities would be less than significant as a result of the Project.

LADWP can generally supply water to development projects within its service area, except under extraordinary circumstances. Additionally, given the incremental increase in water consumption for the Project, and compliance with applicable water conservation ordinance and regulations such as California Code of Regulations (CCR), Title 20, Section 1604; CCR Title 22; City Ordinances 165,004 and 166,080; the Project would not require or result in the construction of new water treatment facilities.

Notwithstanding the above, as part of the building permit process, the lead agency would confirm that there is sufficient capacity in the water supply and infrastructure to accommodate the Project's water needs. If a deficiency or service problem is discovered during the permitting process that prevents the Project from an adequate level of service, the Project Applicant shall fund the required upgrades to adequately serve the Project.

The City has indicated that water service is available; however, water pressure at the Project site has not been measured and a fire flow test will be required as part of the normal building permit process. Other than typical water service laterals, meters, and related devices, no extraordinary water facilities are anticipated. Additional fire hydrants may be required, depending on the building design and Fire Department access requirements.

⁵⁰ Los Angeles Department of Water and Power, website: <http://www.ladwp.com/>, accessed September 2014.

**Table IV-41
Project Estimated Water Demand**

Type of Use	Size	Water Demand Rate (gpd/unit) ^a	Total Water Demand (gpd)
Retail	73,291 sf	96 gpd/1,000 sf	7,036
Creative Office	48,040 sf	180 gpd/1,000 sf	8,647
Restaurant/Cafe ^b	49,575 sf	600 gpd/1,000 sf	29,745
Total Project Water Demand			45,428
<i>Less Existing: Industrial Warehouse</i>	<i>148,000 sf</i>	<i>24 gpd/1,000 sf</i>	<i>3,552</i>
Project Net Increase in Water Demand			41,876
<i>Notes:</i> <i>sf =square feet</i> ^a <i>L.A.CEQA Thresholds Guide (2006), Exhibit M.2-12. Water consumption is assumed to be 120% of wastewater generation.</i> ^b <i>The highest rate among several available for various coffee house, bar, and restaurant types was utilized to present a conservative calculation.</i>			

In the event that any further water main and/or other infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be of a short-term nature, (b) the replacement of the water mains would be within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. Therefore, potential impacts resulting from water infrastructure improvements would be less than significant.

Wastewater Treatment Facilities and Existing Infrastructure

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

The Los Angeles Bureau of Sanitation provides sewer service to the Project area. Sewage from the Project site would be conveyed via sewer infrastructure to the HTP. The HTP treats an average daily

flow of 362 million gallons per day (mgd), and has a design capacity to treat 450 mgd. This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP.⁵¹ As shown in Table IV-42 below, the Project would generate approximately 34,897 gpd of net additional wastewater, representing a fraction of one percent of the available capacity. In accordance with the *L.A. CEQA Thresholds Guide*, the Project's estimated sewer flows were based on the sewerage generation factors for retail and restaurant categories. As the HTP has a remaining capacity to treat 88 additional mgd, it would have adequate capacity to serve the Project. Therefore, impacts to sewer treatment capacity would be less than significant.

**Table IV-42
Project Estimated Wastewater Generation**

Type of Use	Size	Wastewater Generation Rate (gpd/unit) ^a	Total Wastewater Generated (gpd)
Retail	73,291 sf	80 gpd/1,000 sf	5,863
Creative Office	48,040 sf	150 gpd/1,000 sf	7,206
Restaurant/Cafe ^b	49,575 sf	500 gpd/1,000 sf	24,788
Total Project Wastewater Generation			37,857
Less Existing: Industrial Warehouse	148,000 sf	20 gpd/1,000 sf	2,960
Project Net Increase in Wastewater Generation			34,897
Notes: sf = square feet ^a L.A. CEQA Thresholds Guide (2006), Exhibit M.2-12. ^b The highest rate among several available for various coffee house, bar, and restaurant types was utilized to present a conservative calculation.			

The Project is located in a highly urbanized area of the City; therefore, local infrastructure exists to serve the Project site. The Project area is presently served by a network of sewer lines that are located beneath most of the major streets that convey sewage flows from the Project area to the HTP. Through the rules and regulations established in the City of Los Angeles Sewer Allocation Ordinance (Ord. 166,060), the Bureau of Sanitation does not make a determination of sewer capacity until LADBS has established that the Project's plans and specifications are acceptable for plan check. This process ensures the system can accept the anticipated wastewater flows from the Project at the time of connection, as opposed to

⁵¹ City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Treatment Plant, website: http://san.lacity.org/lasewers/treatment_plants/hyperion/index.htm, accessed January 2015.

prematurely committing to projects that are in the environmental review or entitlement process. At the time of connection, the Bureau of Sanitation will check the gauging of the sewer lines and make the appropriate decisions on how best to connect to the local sewer lines at the time of construction. The Applicant will be required to submit a Sewer Capacity Availability Request (SCAR) to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines receiving additional sewer flows from the Project. If it is determined that the sewer system has insufficient capacity to serve the Project, the developer may be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate the Project's increased flows.

Based on the configuration of sewer lines serving the Project site, the Project's sewer flows may be routed to the lines under Palmetto and/or Mateo Streets, or split between both lines. Any infrastructure improvements to update or expand the sewer lines in the Project vicinity, if necessary, would be limited to trenching, excavating and backfilling the sewer lines beneath the public right of way. Such construction activities would be localized in nature and would generally involve partial lane closures for a relatively short duration of time typically lasting a few days to a few weeks. Therefore, impacts to sewer capacity and infrastructure would be less than significant. Additionally, water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures, limitations on hose washing of driveways and parking areas, etc.) would be implemented as part of the Project and would help reduce the amount of Project-generated wastewater. Therefore, impacts to wastewater treatment facilities and existing infrastructure would be less than significant.

c) Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, resulting in the construction of new stormwater drainage facilities. As described in Section 8(c) the Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project site would continue to be directed towards existing storm drains in the Project vicinity. The Project will be required to demonstrate compliance with Low Impact Development Ordinance standards and retain or treat the first $\frac{3}{4}$ inch of rainfall in a 24-hour period. Thus, the rate of post-development runoff and pollutants from the parking area would be reduced under the Project as compared to existing conditions. Therefore, Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems and impacts upon stormwater drainage facilities would be less than significant.

d) Would the project have significant water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified.

Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District (MWD) of Southern California, which is obtained from the Colorado River Aqueduct. These sources, along with recycled water, are expected to supply the City's water needs in the years to come. The 2010 Urban Water Management Plan projects a supply of 555,477 AFY in 2015. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA Aqueduct) is offset with MWD purchases to rise to the level of demand.

As shown in Table IV-41, the Project's net increase for water demand would be 41,876 gallons per day. Pursuant to LAMC Section 99.05.303, the Project is required to utilize water saving devices. Implementation of the specific water conservation features listed in Mitigation Measure 17-1 would ensure that the Project has a less than significant impact with respect to water consumption. Through compliance with these code-required measures in Project design, construction, and operation, the Project's overall water usage would be reduced. The Project would not require new or expanded water service entitlements and would have a less than significant impact with implementation of mitigation measures.

Mitigation Measures:

17-1 Utilities/Service Systems (Local Water Supplies)

- Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate.
- Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.
- Install and utilize only restroom faucets of a self-closing design.
- Install and utilize only high-efficiency Energy Star-rated dishwashers in the Project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the Applicant shall be responsible for ensuring compliance.

- Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements (single-pass cooling refers to the use of potable water to extract heat from process equipment, such as vacuum pumps or ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system).

e) 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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. As stated in 17 (b), above, the sewage flow will ultimately be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the Project.⁵² Therefore, impacts would be less than significant.

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the Solid Waste Management Policy Plan (SWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

⁵² City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Treatment Plant, website: http://san.lacity.org/lasewers/treatment_plants/hyperion/index.htm, accessed June 2013.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multi-family developments, private haulers provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Within the City of Los Angeles, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill serve existing land uses within the City. Both landfills accept residential, commercial, and construction waste. The Sunshine Canyon Landfill is jointly operated by the City and the County, has a remaining capacity of 74.37 million tons.⁵³ Chiquita Canyon Landfill currently has a remaining capacity of 3.97 million tons.⁵⁴ Thus, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill combined have a remaining permitted daily intake of approximately 78.34 million tons. The Sunshine Canyon Landfill has an estimated remaining life of 20 years, and the Chiquita Canyon Landfill has an estimated remaining life of two years. An expansion of the Chiquita Canyon Landfill is currently proposed and would add a capacity of 53,312,400 tons (a 26-year life expectancy based on 2011 daily average).

As of June 30, 2011, Sunshine Canyon Landfill accepted approximately 9,000 tpd during the week and 3,000 tpd on Saturday (due to reduced hours of operation).⁵⁵ Therefore, the Sunshine Canyon Landfill has a remaining daily capacity intake of approximately 3,100 tpd during the week.

Construction

The Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. As summarized in Table IV-43, below, it is estimated that approximately 3,008 tons of solid waste would be generated by the Project's construction and demolition (C&D) activities. As of January 1, 2011 all contractors operating within the City of Los Angeles are required to source separate materials on site for recycling and/or use a permitted private waste hauler to deliver mixed materials to a certified processor for recycling. Thus, only a small percentage of the C&D debris would end up in regional landfills. Exported soil as well as construction and demolition waste at Chiquita Canyon Landfill is used as ground cover for the landfill. Thus, being beneficial, there is no limit of the amount that can be accepted.⁵⁶ Disposal of the approximately 941.5 cubic yards of contaminated soil material to be excavated and removed from the site would take place at a landfill that is licensed and permitted to accept hazardous waste. It is expected that this soil material would be taken to the Buttonwillow Landfill in Kern County, which has a permitted capacity in excess of 10 million cubic yards and thus could

⁵³ County of Los Angeles Department of Public Works, 2012 Annual Report, Los Angeles Countywide Integrated Waste Management Plan, August 2013.

⁵⁴ Ibid.

⁵⁵ Sunshine Canyon Landfill Newsletter, Volume 7, Issue 2, July 2011, website: http://www.sunshinecanyonlandfill.com/home/newsletter/July_2011_Newsletter.pdf, September, 2013.

⁵⁶ Draft EIR for the Convention and Event Center Project, SCH No. 2011031049, April 5, 2012, Page IV.K.3-19, fn 10, certified October 4, 2012.

accommodate the excavated soils from the Project site.⁵⁷ The Project's solid waste impacts during construction would be less than significant.

Operation

As shown in Table IV-44, the Project's net solid waste generation during operation would be 2,879 pounds per day. This estimate is relatively conservative, as it does not factor in any recycling or waste diversion programs. The Project's solid waste would be handled by private waste collection services. As discussed above, the amount of solid waste generated by the Project is within the available capacities at area landfills. Therefore, the impacts would be less than significant.

Table IV-43
Estimated Demolition and Construction Debris

Construction Activity	Size (du/sf)	Rate ^a (lbs./sf)	Generated Waste (tons)
Demolition			
Warehouse Buildings	148,000 sf	36	2,664
Construction			
Retail/Restaurant/Office	170,906 sf	4.02	344
TOTAL			3,008
Notes: ^a U.S. EPA, <i>Characterization of Building-Related Construction and Demolition Debris in the United States</i> , Tables 6 (Demolition) and A-4 (Construction), June 1998.			

Table IV-44
Project Operational Solid Waste Generation

Type of Use	Size	Solid Waste Generation Rate ^a (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Retail/Restaurant ^b	122,866 sf	10.53 lbs/employee/day	2,896
Office ^b	48,040 sf	10.53 lbs/employee/day	1,769
Less Existing Industrial Warehouse	148,000 sf	8.93 lbs/employee/day	1,786
Net Project Solid Waste Generation			2,879
Notes: sf = square feet ^a Los Angeles CEQA Thresholds Guide, 2006. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill. ^b See Table IV-21.			

⁵⁷ Clean Harbors Buttonwillow, LLC, Transportation & Disposal, Buttonwillow Facility Facts, website: http://clark.cleanharbors.com/ttServerRoot/Download/12381_FINAL_Buttonwillow_CA_Facility_FS_030108.pdf, accessed July 27, 2015.

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The Project would generate solid waste that is typical of a mixed-use development and would comply with all federal, State, and local statutes and regulations.

Project would be disposed of in compliance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939. The amount of Project-related waste disposed of at area landfills would be reduced through recycling and waste diversion programs implemented by the City, in compliance with the City's Solid Waste Management Policy Plan, which is the long-range solid waste management policy plan for the City, and the Source Reduction and Recycling Element, which is the strategic action policy plan for diverting solid waste from landfills.

The Project would also comply with applicable regulatory measures, including the provisions of City Ordinance No. 171,687, regarding recycling for all new construction and other recycling measures; the provision of permanent, clearly marked, durable, source-sorted bins to facilitate the separation and deposit of recyclable materials; and implementation of a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction.

Overall, waste generated by the Project would not alter the projected timeline for landfills within the region to reach capacity. The Project would comply with federal, State, and local regulations, and impacts would be less than significant.

Cumulative Impacts: Utilities and Service Systems

Wastewater

Less Than Significant Impact. Development of the Project, in conjunction with the cumulative projects, would result in an intensification of existing land uses in an already heavily urbanized area of Los Angeles and could further increase demands for sewer service. As discussed above, the HTP treats an average daily flow of 362 mgd, and has capacity to treat 450 mgd. This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP. In accordance with the State WDRs, the City audits its SSMPs a minimum of once every two years, including a review of their compliance with the WDRs and effectiveness in controlling and responding to sanitary sewer overflows. The last audit was completed in February 2013, which confirmed that the City's SSMPs are in full compliance and perform exceptionally well.⁵⁸

⁵⁸ *Ibid.*

With respect to local infrastructure, under the rules and regulations established in the City of Los Angeles Sewer Allocation Ordinance (Ord. 166,060), the Bureau of Sanitation assesses the anticipated wastewater flows from development projects at the time of connection, and makes the appropriate decisions on how best to connect to the local sewer lines at the time of construction. The Applicants for each project will be required to submit a SCAR to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines receiving additional sewer flows from each Project. If it is determined that the sewer system in the local area has insufficient capacity to serve a particular development, the developer of that project may be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate that project's increased flows. Each project would be evaluated on a case-by-case basis and would be required to consult with the Bureau of Sanitation and comply with all applicable city and state water conservation programs and sewer allocation ordinances. Therefore, cumulative impacts on wastewater services would be less than significant.

Water

Less Than Significant Impact. Development of the Project, in conjunction with the cumulative projects, would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles and could further increase the demand for potable water within the City. Through the 2010 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2035. This estimate is based in part on demographic projections obtained for the LADWP service area from the MWD. The MWD utilizes a land-use based planning tool that allocates projected demographic data from the SCAG into water service areas for each of MWD's member agencies. MWD's demographic projections use data reported in SCAG's 2012 RTP. As discussed previously in this section under the Population and Housing subheading, the Project, in conjunction with the cumulative projects, would be consistent with the regional and local employment growth projections. As such, the additional water demands generated by these projects are accounted for in the 2010 Water Management Plan and impacts associated with increased water demand would not be cumulatively considerable. Each of the cumulative projects would be subject to the City's LAMC and environmental review process to ensure each project is consistent with the underlying zoning and General Plan land use designations that were relied upon in factoring in the region's growth assumptions in the 2010 UUWMP. To the extent such projects are consistent with the zoning and General Plan land use designations, such projects are already factored into the 2035 water demand forecast. To the extent any project is not consistent with the growth forecasts of the 2010 UWMP, those projects would be subject to a project specific water supply assessment by the LADWP to ensure adequate water supplies are available to serve those specific projects. Through this process, cumulative impacts upon regional water supplies would be reduced to less than significant levels.

Solid Waste

Less Than Significant Impact. Development of the Project, in conjunction with the cumulative projects, would result in an intensification of existing prevailing land uses in an already heavily urbanized area of

Los Angeles and could further increase regional demands on landfill capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing landfills serving the City of Los Angeles. Although there are several proposals for new landfills in the region, there are currently few viable options for City of Los Angeles waste past 2029.

The cumulative projects would participate in regional source reduction and recycling programs, significantly reducing the number of tons deposited in area landfills. While in the short-term adequate landfill capacity exists to accommodate solid waste generated by the Project, in the future there will be a need to develop additional landfills and other waste disposal options to accommodate future growth. These options include diversion or transformation as the preferred methods for addressing solid waste and specific and practical applications (i.e., market development, public education and public policy initiatives) within the City.

The City of Los Angeles Solid Waste Management Plan (AB 939) sets forth strategies that would provide adequate landfill capacity through 2037 to accommodate anticipated growth. The Bureau of Sanitation has projected the need for waste disposal capacity based on SCAG's regional population growth projections. The growth associated with both projects is within those projections. Furthermore, projects within the City of Los Angeles must comply with the City's SRRE.

As reported by the Bureau of Sanitation in 2009, the City had achieved a waste diversion rate of 65 percent. The City is exceeding the state-mandated diversion goal of 50 percent by 2000 set by the CIWMA of 1989.⁵⁹ Waste diversion rates are required to increase to 75 percent by 2025 and through on-going development of waste management infrastructure over the last decade and innovative source reduction, reuse, recycling, and composting programs have been implemented. These programs include Green Mulching and Composting workshops, black yard trimming recycling cans, the city-owned Central Los Angeles Refuse Transfer Station (CLARTS), and Residential Special Material and Electronics Recycling or S.A.F.E. Centers. New programs are being implemented to increase the amount of waste diverted by the City, including: multi-family recycling, food waste recycling, commercial recycling and technical assistance and support for City departments to help meet their waste reduction and recycling goals. The City is also developing programs to ultimately meet a goal of zero waste by 2030. Thus, the Project's contribution to cumulative impacts will continue to decrease as it increases waste diversion rates in accordance with City goals. Therefore, cumulative impacts with respect to solid waste would be less than significant.

⁵⁹ *The City of Los Angeles Department of Public Works Bureau of Sanitation, Overview of Services for FY 2005/06, updated June 14, 2005. http://www.lacity.org/san/general_info/about_us/our_services/overview_of_services.pdf.*

18. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

No Impact. A significant impact may occur only if the Project would have an identified potentially significant impact for any of the above issues. The Project is located in a densely populated urban area and would have no unmitigated significant impacts with respect to biological resources and less than significant cultural resource impacts provided the mitigation measures listed above are implemented. The Project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, no impact would occur.

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

Less than Significant Impact. A significant impact may occur if the Project, in conjunction with other cumulative development projects in the area of the Project site, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. The Project would not combine with cumulative projects to create a cumulatively significant impact in any of the environmental issues analyzed in the Draft IS/MND.

In particular, the Project and cumulative projects are anticipated to comply with applicable federal, state, and city regulations that would preclude significant cumulative impacts regarding geology and soils, cultural resources, hazards and hazardous materials, hydrology and water quality, and transportation and traffic. These resource areas (geology and soils, cultural resources, hazards and hazardous materials, and hydrology) are site-specific, such that each cumulative project would need to be evaluated within its own site-specific context. Further, the cumulative traffic analysis for “Future Year 2016” found that no intersections would be significantly impacted by the Project in combination with the cumulative projects.

Regarding aesthetics and land use, compliance with City design and land use standards would ensure that any cumulative impacts related to aesthetics and land use would be less than significant. Further, cumulative projects would be individually evaluated for consistency with applicable land use standards. Aesthetics is a subjective resource area in which each project must be analyzed within its own local setting to determine whether visual character of a site is affected. In addition, the Project would not combine with other cumulative projects to block significant viewsheds in the Project vicinity. The Project would not contribute to a permanent population increase.

With respect to cumulative demand on public services, each cumulative project would be individually subject to review by LAFD and LAPD, and would be required to comply with all applicable safety requirements. Further, funding for any new facilities would be funded via existing mechanisms (i.e., sales taxes and government funding) to which all cumulative developments would contribute. All cumulative projects would also be required to pay any applicable developer fees to the LAUSD, and Quimby and/or Park and Recreation fees to the LADRP. As such, cumulative demands on public services would be less than significant.

Impacts with respect to water consumption, wastewater generation, and solid waste generation resulting from the Project would be less than significant with implementation of provided mitigation measures, where applicable. These mitigation measures identified for the Project are standard mitigation measures from the City that would also apply to the cumulative projects.

Therefore, the Project's incremental contribution to cumulative impacts would be less than significant.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. A significant impact may occur if the Project has the potential to result in significant impacts, as discussed in the preceding sections. As described throughout this environmental impact analysis, with implementation of the recommended mitigation measures, where applicable, the Project would not result in any unmitigated significant impacts. Thus, the Project would not have the potential to result in substantial adverse effects on human beings and impacts would be less than significant.

V. LIST OF PREPARERS

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