

# Appendices

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## **Appendix A**

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Initial Study, Notice of Preparation (NOP), and  
NOP Comment Letters

## **Appendix A.1**

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Initial Study



## 2143 Violet Project

Case Number: ENV-2017-438-EIR

**Project Location:** 2117–2147 E. Violet Street; 2118–2142 E. 7th Place, Los Angeles, CA 90021

**Community Plan Area:** Central City North

**Council District:** 14—Huizar

**Project Description:** The Project would include 347 new live-work units, approximately 187,374 square feet of new office space, 21,858 square feet of new retail/restaurant floor area, and 926 square feet of artist production amenity space. These new uses would be located in a 15-story building with a maximum height of 179 feet. In addition, five existing buildings that comprise approximately 56,686 square feet would be retained with office, retail, restaurant, warehouse, and live-work units. The Project Site is currently improved with seven structures and two sheds. Of these, two open sheds and two buildings containing four live-work units would be removed. Upon completion, up to 569,448 square feet of floor area would be located within the Project Site, including the existing floor area to remain, resulting in a maximum floor area ratio (FAR) of 6.0:1 within the Project. The Project would also provide approximately 828 vehicular parking spaces and 1,284 bicycle parking spaces within six subterranean parking levels.

**PREPARED FOR:**

The City of Los Angeles  
Department of City Planning

**PREPARED BY:**

Eyestone Environmental

**APPLICANT:**

ONNI Capital, LLC

# INITIAL STUDY

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# INITIAL STUDY

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## Executive Summary

**Project Title:** 2143 Violet Street

**Environmental Case Number:** ENV-2017-438-EIR

**Related Cases:** CPC-2017-437-GPAJ-VZCJ-HD-VCU-CU-MCUP-SPR, VTT-74890-CN

**Project Location:** 2117–2147 E. Violet Street; 2118–2142 E. 7th Place, Los Angeles, CA 90021

**Community Plan Area:** Central City North

**Council District:** 14

**Lead City Agency:** City of Los Angeles Department of City Planning

**Staff Contact Name and Address:** William Lamborn, 221 Figueroa St., Ste. 1350, Los Angeles, CA 90012

**Phone Number:** (213) 847-3637

**Applicant Name and Address:** ONNI Capital, LLC, 315 W. 9th St., Ste. 801, Los Angeles, CA 90015

**Phone Number:** (213) 279-2315

**General Plan Designation:** Heavy Industrial

**Zoning:** M3-1-RIO (Heavy Industrial, Height District 1, River Improvement Overlay)

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### PROJECT DESCRIPTION:

The Project would include 347 new live-work units, approximately 187,374 square feet of new office space, 21,858 square feet of new retail/restaurant floor area, and 926 square feet of artist production amenity space. These new uses would be located in a 15-story building with a maximum height of 179 feet. In addition, five existing buildings that comprise approximately 56,686 square feet would be retained with office, retail, restaurant, warehouse, and live-work units. The Project Site is currently improved with seven structures and two sheds. Of these, two open sheds and two buildings containing four live-work units would be removed. Upon completion, up to 569,448 square feet of floor area would be located within the Project Site, including the existing floor area to remain, resulting in a maximum floor area ratio (FAR) of 6.0:1 within the Project. The Project would also provide approximately 828 vehicular parking spaces and 1,284 bicycle parking spaces within six subterranean parking levels..

For additional detail, refer to the attached Project Description.

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**ENVIRONMENTAL SETTING:**

The Project Site is located at 2117–2147 E. Violet Street and 2118–2142 E. 7th Place in the Arts District area of the City of Los Angeles. Primary regional access is provided by the Hollywood Freeway (US-101), the Santa Monica Freeway (I-10), and the golden State Freeway (I-5), which are all accessible within less than 1 mile of the Project Site. Major arterials providing regional access to the Project Site include South Santa Fe Avenue, East 7th Street, East Olympic Boulevard, and South Alameda Street. The approximately 2.2-acre Project Site is specifically bounded by East 7th Place to the north, East Violet Street to the south, an alley to the west, and properties to the east used primarily for parking. Further to the east are railroad tracks and the Los Angeles River. The Project vicinity is developed with a mix of light industrial, commercial, and residential uses.

The Project Site is currently developed with seven buildings, located on the northern half of the Project Site, that comprise approximately 63,530 square feet of floor area and range in height from one to three stories. These existing buildings are used for office, retail, warehouse, and live-work uses. The Project Site also includes two open sheds and surface parking areas generally located on the southern half of the Project Site.

The Project Site is located within the planning boundary of the Central City North Community Plan area. The Project Site has a General Plan land use designation of Heavy Industrial and is zoned M3-1-RIO (Heavy Industrial, Height District 1, River Improvement Overlay).

For additional detail, refer to the attached Project Description.

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**Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?**

No; consultation has not yet commenced.

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

N/A

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**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

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

**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.

William Lamborn

PRINTED NAME



SIGNATURE

City Planner

TITLE

(213) 847-3637

TELEPHONE NUMBER

## 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 Analysis,” as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
  - a) The significance criteria or threshold, if any, used to evaluate each question; and
  - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

## **A. Project Description**

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# INITIAL STUDY

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## Project Description

### A. Project Summary

The Project proposes a new mixed-use development on a 96,523-square-foot site (Project Site) located in the Central City North Community Plan area of the City of Los Angeles (the Project). The Project would include up to 347 new live-work units, and approximately 187,374 square feet of new office space, 21,858 square feet of new retail/restaurant floor area, and 926 square feet of artist production amenity space. These new uses would be located in a 15-story building with a maximum height of 179 feet. In addition, five existing buildings within the northern portion of the Project Site that comprise approximately 56,686 square feet would be retained with office, retail, restaurant, warehouse, and live-work units. Two existing buildings that contain four live-work units and two existing open sheds would be removed. Upon completion, up to 569,448 square feet of floor area would be located within the Project Site, including the existing floor area to remain, resulting in a maximum floor area ratio (FAR) of 6.0:1. The Project would also provide approximately 828 vehicular parking spaces and 1,284 bicycle parking spaces within six subterranean parking levels.

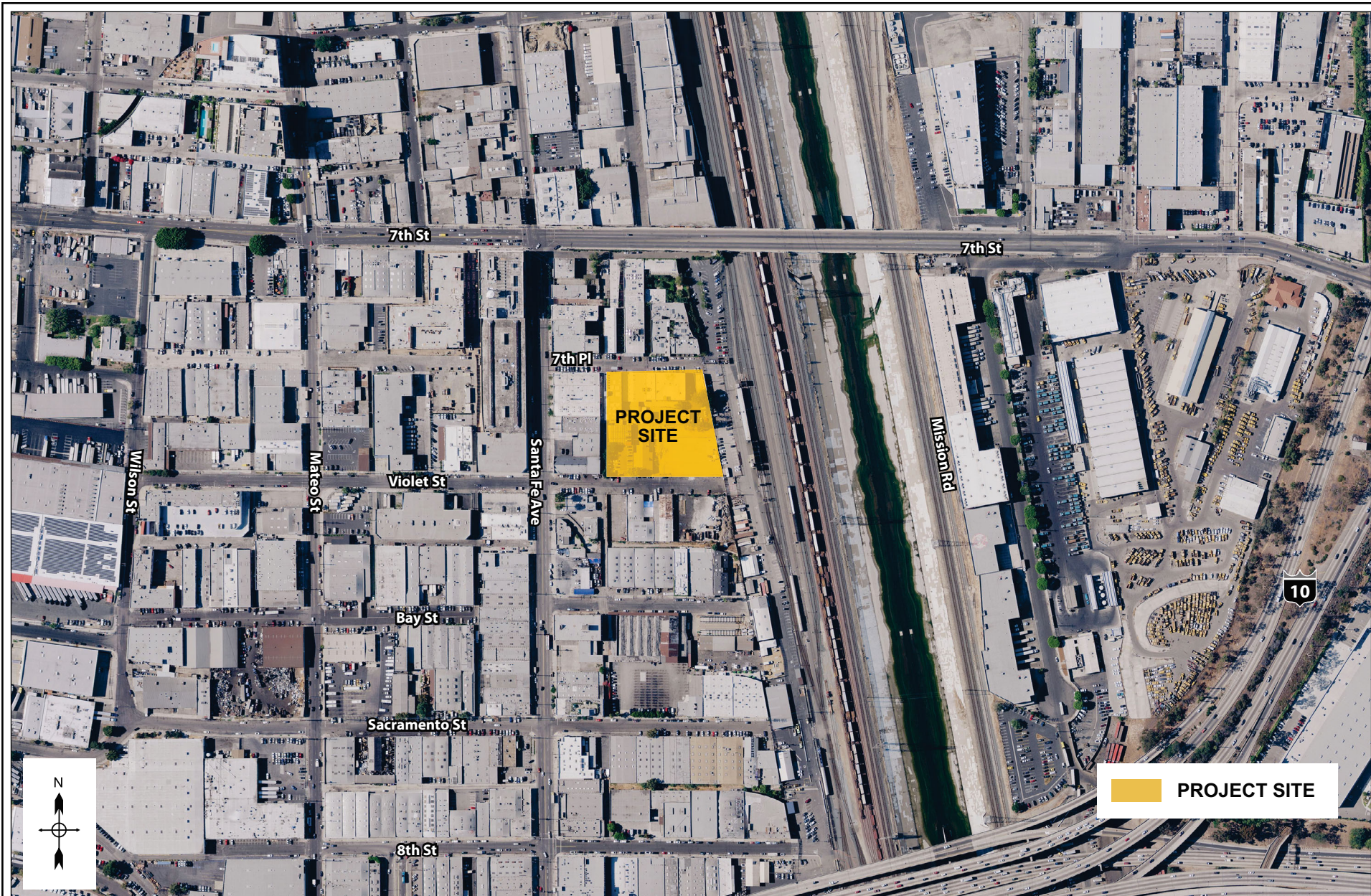
### B. Environmental Setting

#### 1. Project Location

As shown in Figure A-1 on page A-2, the Project Site is located in the Arts District area of the City of Los Angeles (City), approximately 14 miles east of the Pacific Ocean. Primary regional access is provided by the Hollywood Freeway (US-101), the Santa Monica Freeway (I-10), and the golden State Freeway (I-5), which are all accessible within less than 1 mile of the Project Site. Major arterials providing regional access to the Project Site include South Santa Fe Avenue, East 7th Street, East Olympic Boulevard, and South Alameda Street. The approximately 2.2-acre Project Site is specifically bounded by East 7th Place to the north, East Violet Street to the south, an alley to the west, and properties to the east used primarily for parking. Further to the east are railroad tracks and the Los Angeles River.



**Figure A-1**  
Project Location Map



**Figure A-2**  
Aerial Photograph of Project Vicinity

## 2. Existing Uses

### a. Existing Project Site Conditions

As shown in Figure A-2 on page A-3, the northern portion of the Project Site is currently developed with seven buildings that comprise approximately 63,530 square feet of floor area and range in height from one to three stories and used for 6,983 square feet of office, 25,739 square feet of retail, 2,109 square feet of warehouse, and 10 live-work units comprised of 28,699 square feet. The Project Site also includes two sheds and surface parking areas generally located on the southern half of the Project Site. Vehicular access to the site is currently available at driveways along Violet Street, East 7th Place, and a public alley that abuts the Project Site to the west. The Project Site is relatively flat with limited ornamental landscaping.

### b. Land Use and Zoning

The Project Site is located within the planning boundary of the Central City North Community Plan area. The Project Site has a General Plan land use designation of Heavy Industrial and is zoned M3-1-RIO. The M3 designation indicates that the Project is located in a Heavy Industrial zone, which permits a wide variety of industrial, manufacturing, and storage uses, as well as office and commercial uses. The “1” indicates that the Project Site is located in Height District 1, which does not specify a building height limit, but limits the FAR to 1.5 to 1. The RIO designation is for the City’s River Improvement Overlay (RIO) district, which is designed to provide for preservation of tributaries and rivers in the City of Los Angeles by promoting river identity, supporting local species, and convenient access, among many other aspects.

The Project Site is also located within the East Los Angeles State Enterprise Zone, and the Central Industrial Redevelopment Project area.

## 3. Surrounding Land Uses

The Project Site is located at the southern edge of the Arts District. As shown in Figure A-2, the Project vicinity is developed with a mix of light industrial, commercial, and residential uses. Nearby uses include Blu Leaf Clothing store, restaurants (Bestia, Sprout LA), the Cartifact corporate offices, and the 2121 Lofts to the north; a recycling center (Excel Metals) and a distribution facility (Manuel’s Produce) to the south; Stumptown Coffee Roasters, Ruffworld Recording Studio, Alphacast Foundry, and other office uses to the west; and rail lines and the Los Angeles River to the east. Other uses in the Project vicinity include creative loft spaces (Toy Factory Lofts and the Biscuit Company Lofts) located north of the Project Site along Mateo Street, the Ford Factory building across South Santa Fe Avenue, and the Hyperloop One headquarters along Bay Street.

The Project Site is also located approximately 0.5 mile south of the 6th Street Viaduct project that is currently under construction and will provide a two-way multi-modal bridge with dedicated bicycle lanes that will span the Los Angeles River and connect to the Boyle Heights neighborhood to

the east.<sup>1</sup> Plans also call for new recreational green spaces on former industrial sites underneath the new bridge.<sup>2</sup>

## B. Description of the Project

### 1. Project Overview

The Project proposes a new mixed-use development on a 96,523 square-foot (2.2-acre) site located in Arts District. As shown in Table A-1 on page A-6, proposed new uses would include 347 live-work units, approximately 187,374 square feet of office space, square 21,858 feet of commercial floor area, and 926 square feet of artist production amenity space. These new uses would be located in a 15-story building with a maximum height of 179 feet. In addition, five existing buildings within the northern portion of the Project Site that comprise approximately 56,686 square feet would be retained. Two buildings that comprise approximately 6,844 square feet and four live-work units, as well as two open sheds and surface parking spaces, would be removed. In addition, the City has recently issued permits for the conversion of approximately 5,055 square feet of existing retail and warehouse uses to restaurant uses.<sup>3</sup> For purposes of providing a conservative evaluation of the Project, conversion of these uses is also accounted for as part of the Project. Upon completion, approximately 569,448 square feet of floor area would be located within the Project Site. The proposed uses would be supported by 828 parking spaces that would be distributed within six subterranean levels.

As shown in the Conceptual Site Plan provided in Figure A-3 on page A-7, the existing commercial uses and six live-work units located within the northern portion of the Project Site along the Site's East 7th Place frontage would remain and would be integrated with the new mixed-use building through a new paseo, pedestrian pathways and plazas. Figure A-4 on page A-8 shows the ground level of the new mixed-use building, which would include 21,858 square feet of retail/restaurant space, an outdoor arts plaza, indoor artist production space, 13 live-work units, live-work and office lobbies, and gym amenities. Office space would be provided on Levels 2 through 5, while additional live-work units would be on levels 6 through 15. Approximately 11,656 square feet of amenities would be provided within the proposed building, which would include a pool, a gym, a theater, lounge spaces, a cyber café and a rock climbing wall.

The Project would require a General Plan Amendment to the Central City North Community Plan to change the land use designation from Heavy Industrial to Regional Center Commercial and a Vesting Zone and Height District Change from M3-1-RIO to C2-2-RIO.<sup>4</sup> Under the proposed General

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<sup>1</sup> City of Los Angeles, Bureau of Engineering, *Sixth Street Viaduct Replacement Project, Frequently Asked Questions*, [www.sixthstreetviaduct.org/faq](http://www.sixthstreetviaduct.org/faq), accessed November 8, 2017.

<sup>2</sup> City of Los Angeles, Department of Public Works, Bureau of Engineering, Environmental Management Group, *Notice of Preparation Including an Initial Study/Environmental Checklist for the Sixth Street Park, Arts, River & Connectivity Improvements (PARC) Project*, April 13, 2017.

<sup>3</sup> Los Angeles Department of Building and Safety Permit No. 16016-10000-14951 and Planning Case No. ZA-2017-1185-CUB allows for future restaurant use by an operator.

<sup>4</sup> The proposed C2 zone and the proposed Regional Center Commercial land use designation permits density equivalent to the R5 (Multiple Residential) zone, or 1 dwelling unit per 200 square feet of lot area. Based on (Footnote continued on next page)

**Table A-1  
Summary of Proposed Floor Area<sup>a</sup>**

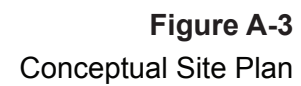
| <b>Land Use</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Existing Development</b> | <b>Proposed New Development</b> | <b>Existing and Reconfigured Uses to Remain</b> | <b>Floor Area Upon Completion</b> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|---------------------------------|-------------------------------------------------|-----------------------------------|
| Live-Work (including storage, and amenities)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 28,699 sf<br>(10 units)     | 302,604 sf<br>(347 units)       | 21,855 sf<br>(6 units)                          | 324,459 sf<br>(353 units)         |
| Office                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 6,983 sf                    | 187,374 sf                      | 6,983 sf                                        | 194,357 sf                        |
| Retail/Restaurant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 25,739 sf                   | 21,858 sf                       | 25,739 sf <sup>b</sup>                          | 47,597 sf                         |
| Warehouse                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 2,109 sf                    | 0 sf                            | 2,109 sf                                        | 2,109 sf                          |
| Artist Production Amenity Space                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | N/A                         | 926 sf                          | N/A                                             | 926 sf                            |
| <b>Total</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>63,530 sf</b>            | <b>512,762 sf</b>               | <b>56,686 sf</b>                                | <b>569,448 sf</b>                 |
| <p><i>sf = square feet</i><br/> <i>du = dwelling units</i></p> <p><sup>a</sup> Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as “[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas.”</p> <p><sup>b</sup> Includes the conversion of approximately 5,055 square feet of existing retail and warehouses uses to restaurant uses has been approved by the City (Los Angeles Department of Building and Safety Permit No. 16016-10000-14951 and Planning Case No. ZA-2017-1185-CUB), which allows for future restaurant use by an operator. For purposes of providing a conservative evaluation of the Project, conversion of these uses is also accounted for in the Project.</p> <p>Source: Eyestone Environmental, 2018.</p> |                             |                                 |                                                 |                                   |

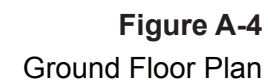
Plan Amendment, the Project would be required to comply with the construction labor standards for residency, wage, and training set forth in LAMC Section 11.5.6.B.2 and satisfy the requisite affordable housing provisions set forth in LAMC 11.5.11, both of which were added by Measure JJJ. LAMC Section 11.5.11 requires the Project to set aside a minimum of five percent of the total units for Extremely Low Income households and 11 percent of the total units for Very Low Income households. The proposed Zone and Height District Change would permit a maximum 6.0:1 FAR. With a buildable area of 94,946 square feet, a 6.0:1 FAR would permit a total of 569,448 square feet of floor area within the Project Site. As set forth above, the Project proposes a floor area of 569,448 square feet, which would not exceed the maximum 6.0:1 FAR.

As set forth below, the Project also proposes a Vesting Conditional Use Permit to permit floor area averaging and density transfer within a unified development, and a zero-foot side yard in lieu of 16 feet otherwise required along the easternmost property line for the residential levels.

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*the requested Zone and Height Change and General Plan Amendment, the Project Site would be permitted a maximum of 475 dwelling units. The proposed total 353 live/work units is less than the number of residential units permitted within the proposed C2 zone.*





## 2. Design and Architecture

The design of the Project is intended to create an active street edge along both Violet Street and East 7th Place through the placement of commercial uses, improvements to the streetscape, and integration with internal paseos and plazas. The design of the building is intended to reflect the Arts District's industrial context and the history of the rail infrastructure that supported this historic use. Incorporating white panel and punched vision glass, the Project reflects the structural rhythm of the railroad tie through a modulated pattern on the façade.

Building scale and massing is defined by staggered massing components that break up the façade into distinct and offset planes. The staggered design breaks up the building's massing and provides a setback from East 7th Place. The staggered design also creates large projection balconies that provide functional outdoor open space. Additional balconies and recessed window elements also create texture in the massing components.

## 3. Open Space and Landscaping

The Project would incorporate open space and recreational amenities, particularly within the ground level and on Level 6. The primary open space amenity would be a ground-level pedestrian paseo proposed between the existing buildings and new building that would lead to the central portion of the ground level where a courtyard/plaza area is proposed. The paseo is intended to be activated with mural art, shared artist production and exhibition spaces and to provide an opportunity to showcase art on the façade facing the adjacent courtyard. Soft and hard landscaping along the paseo would be provided. Other open space amenities would include an indoor common amenity space on the ground floor for residents, decks on Level 2 through 5 for office tenants, outdoor amenity spaces on the Level 6 with a swimming pool and a rock climbing wall, and a variety of landscaped open spaces. In addition, private residential balconies would be dispersed throughout the residences. Overall, as shown in Table A-2 below, the Project would provide approximately 34,831 square feet of open space, which exceeds the open space requirements set forth by LAMC Section 12.21-G.

**Table A-2**  
**Summary of Proposed Open Space**

| Open Space Type                                                                                                           | Size             |
|---------------------------------------------------------------------------------------------------------------------------|------------------|
| Ground Level Patio                                                                                                        | 1,975 sf         |
| Ground Level Interior Amenity Space                                                                                       | 6,110 sf         |
| Level 6 Podium, West Side                                                                                                 | 8,576 sf         |
| Level 6 Podium, West Side                                                                                                 | 7,807 sf         |
| Level 6 Covered Amenity Space                                                                                             | 8,013 sf         |
| Private Patio/Balconies (Levels 1, 6, 9, 12 & 13)                                                                         | 2,350 sf         |
| <b>Total Open Space Provided</b>                                                                                          | <b>34,831 sf</b> |
| <hr/> <i>sf = square feet</i><br><i>Source: Carter, Romanek Landscape Architects, Inc.; Eyestone Environmental, 2018.</i> |                  |

## 4. Access, Circulation, and Parking

Vehicular access to the subterranean parking areas would be provided via a driveway along Violet Street within the southeastern corner of the Project Site. Access for trash pickup and other freight vehicles would be provided via a loading driveway accessible through the alley on the western side of the Project Site.

Pedestrian access would be provided along the perimeter of the site. Access to the walk-up ground floor live/work units and amenity areas would be from the new internal paseos and internal pedestrian pathways. Access to the residential live-work lobby would be from Violet Street. Primary pedestrian access to the office component would be from an office lobby located along East 7th Place within the northeastern corner of the Project site.

Public transit service in the vicinity of the Project Site is currently provided by multiple local and regional bus lines, several of which provide connections to Downtown subway stations including Pershing Square and 7th Street/Metro Center. In particular, the Los Angeles County Metropolitan Transit Authority (Metro) provides a bus stop for Metro Local Line 60 located at the corner of South Santa Fe Avenue and Violet Street, which is the closest bus stop to the Project Site.<sup>5</sup> Other nearby transit lines include Metro Local Line 18, which provides service east/west from the City of Montebello to the Wilshire Center area, and Metro Local Line 62, which provides service from Downtown Los Angeles, east to Santa Fe Springs, and south to Hawaiian Gardens. Additionally, the Greyhound Bus Terminal is located south of the project site on 7th Street, which provides inter-city bus service to various locations outside of the Los Angeles.

Based on LAMC requirements for the proposed land uses and existing uses to remain, the Project would be required to provide 774 vehicle parking spaces and 461 bicycle parking spaces. The Project would provide 828 vehicle parking spaces and 1,284 bicycle parking spaces, which would exceed LAMC requirements. These parking spaces would be located within six subterranean parking levels. The Project also would comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking area.

## 5. Lighting and Signage

Exterior lighting along the public areas would include pedestrian-scale (i.e., lower to the ground, spaced closer together) fixtures. Exterior lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the site. Project lighting would be designed to minimize light trespass from the Project Site and would comply with all LAMC requirements. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would require approval from the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties.

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<sup>5</sup> *Metro, Nextrip Service (Route 60 Downtown LA—Artesia Station via Long Beach, Stop: Santa Fe/Violet), [www.metro.net/riding/nextrip/](http://www.metro.net/riding/nextrip/).*

Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the Project Site and with the requirements of the LAMC. Proposed signage would include mounted project identity signage, building and commercial tenant signage, and general ground-level and wayfinding pedestrian signage. Wayfinding signs would be located at parking garage entrances, elevator lobbies, vestibules, and residential corridors.

## 6. Site Security

During construction of the Project, temporary security measures including security fencing, lighting, and locked entry would be implemented to ensure security of the Project Site. The following security features would also be incorporated in the Project design to enhance on-site safety:

- Design lobby areas to be visible from the public streets or entry ways.
- Design building entrances and exits, spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites.
- Design public spaces to be easily patrolled and accessed by safety personnel.
- Locate public restrooms and other common facilities in convenient and accessible areas in order to increase use and the perception of safety.
- Provide sufficient lighting of building entries and walkways to facilitate pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings.
- Provide sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment.
- Provide gated access to parking facilities with a keycard access system in all resident-only parking structure entrances and exits.
- Include access controls in the forms of private on-site security, a closed circuit security camera system, and keycard entry for the residential building and the residential parking areas.

Additionally, during Project operation, the following on-site security features would be implemented to ensure the safety of Project residents.

- Provide 24-hour security to monitor entrances and exits, manage and monitor the fire/life/safety systems, patrol the perimeter of the property, and control and monitor activities in the public spaces and private outdoor areas.
- Display contact information for on-site security staff prominently throughout the Project.
- Provide Project residents with information on local Neighborhood Watch groups and encourage residents to participate in community groups and workshops in order to strengthen the connections between Project residents and their neighbors in the community.

## 7. Sustainability Features

The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but would not be limited to WaterSense-labeled plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star-labeled appliances; and water-efficient landscape design.

### a. CEQA Guidelines Appendix F

In accordance with CEQA Guidelines Appendix F, the EIR will provide further information as to energy conservation, energy implications, and the energy-consuming equipment and processes that would be used during Project construction and operation. Design features of the Project, energy supplies that would serve the Project, and total estimated daily vehicle trips that would be generated by the Project will also be analyzed. An analysis of the Project's consistency with Appendix F will be provided in the EIR.

## 8. Anticipated Construction Schedule

Construction of the Project would commence with demolition of two of the existing industrial structures and open sheds. This phase would be followed by grading and excavation for the subterranean parking garage. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to begin in early 2020 and be completed mid-2022. It is estimated that approximately 239,500 cubic yards of export material (e.g., concrete and asphalt surfaces) and soil would be hauled from the Project Site during the demolition and excavation phase.

## D. Requested Permits and Approvals

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

- Pursuant to LAMC Section 11.5.6, General Plan Amendment to the Central City North Community Plan to change the land use designation from Heavy Industrial to Regional Center Commercial;
- Pursuant to LAMC Section 12.32-Q, a Vesting Zone and Height District Change from M3-1-RIO to C2-2-RIO;

- Pursuant to LAMC Section 12.24.T and 12.24-W,19, a Vesting Conditional Use Permit to permit floor area averaging and residential density transfer within a unified development;
- Pursuant to LAMC Section 16.05, Site Plan Review for a maximum of 347 net new live-work units and a maximum of 210,158 square feet of net new non-residential floor area;
- Pursuant to LAMC Section 12.24-W,1, a Master Conditional Use Permit for the on-site sale of a full-line of alcoholic beverages within the Project's commercial areas;
- Pursuant to LAMC Section 11.5.11-E (Measure JJJ) and Government Code Section 65915(k), an affordable housing development incentive to permit zero-foot side yards in lieu of 16 feet otherwise required for the residential levels along the eastern property line;
- Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map for the merger and re-subdivision of the Project Site into three lots and for residential and commercial condominiums and including Haul Route approval;
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, and building permits.

## **B. Environmental Checklist**

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# INITIAL STUDY

## Environmental Checklist

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

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

**No Impact.** A scenic vista is a view of a valued visual resource. Scenic vistas generally include public views that provide visual access to large panoramic views of natural features, unusual terrain, or unique urban or historic features. A scenic vista field of view can be wide, extend into the distance, and include focal views that focus on a particular object, scene, or feature of interest for the benefit of the general public.

The Project Site is located within a highly urbanized area of the City of Los Angeles (City). Visual resources in the general vicinity of the Project Site include the Los Angeles River, the downtown Los Angeles skyline, and structures that may be considered historic resources. As discussed in the Project Description of this Initial Study, the Project includes development of a new building with a maximum height of 179 feet. In addition, five existing buildings within the northern portion of the Project Site would be retained. The Project Site is bound by commercial and industrial structures to the north along 7th Place, to the west along Santa Fe Avenue, commercial and warehouse structures to the west along Violet Street, and train tracks to the east. The Project Site does not offer scenic vistas or views of the Los Angeles River. Development of the Project would not impair any views of the Los Angeles River since none currently exist. There are no other scenic

vistas visible from the Project Site or the adjoining public right-of-way. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?**

**No Impact.** The Project Site is not located along a state scenic highway. The nearest officially eligible state scenic highway is along the Foothill Freeway (I-210), approximately 8.5 miles northeast of the Project Site,<sup>1</sup> and the nearest City-designated scenic parkway is along Stadium Way between the I-5 and I-110 Freeways, approximately 2.5 miles north of the Project Site.<sup>2</sup> Thus, the Project would not substantially damage scenic resources within a designated scenic highway. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**c) Substantially degrade the existing visual character or quality of the site and its surroundings?**

**Potentially Significant Impact.** As discussed in the Project Description of this Initial Study, the Project Site is located in a highly urbanized area characterized by a mixture of low- and mid-rise buildings occupied by a mix of uses. During construction activities for the Project, the visual appearance of the Project Site would be altered due the presence of construction equipment. In addition, as discussed in the Project Description of this Initial Study, the Project includes development of a new building with a maximum height of 179 feet. Thus, proposed development could potentially change the existing visual character and quality of the site and its surroundings. Further analysis of potential impacts associated with visual character and quality, including potential shading impacts, will be included in an EIR.

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

**Potentially Significant Impact.** The existing ambient nighttime lighting environment within the Project Site and vicinity is typical of a developed, urban environment where the primary nighttime lighting sources include interior light spillage from buildings, vehicle headlights along roadways and in parking areas, signage, street lamps, and security/parking lighting. Glare sources within the Project vicinity include glass and metal vehicle and building surfaces.

The Project would introduce new sources of light and glare that are typically associated with residential and commercial uses, including architectural lighting, signage lighting, interior lighting, and

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<sup>1</sup> California Scenic Highway Mapping System, Los Angeles County, [www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/index.htm](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm), accessed February 26, 2018.

<sup>2</sup> Mobility Plan 2035, Map A4, Citywide General Plan Circulation System—Central, Midcity Subarea.

security and wayfinding lighting. Construction of the Project also has the potential to generate light and glare. Thus, further analysis of potential light and glare impacts will be included in an EIR.

| Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact |
|--------------------------------------|----------------------------------------------------------------|------------------------------------|-----------|
|--------------------------------------|----------------------------------------------------------------|------------------------------------|-----------|

## II. AGRICULTURE AND FOREST RESOURCES.

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

- |                                                                                                                                                                                                                                                                                            |                          |                          |                          |                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?                                             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?                                                                                                                                                                                                       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined 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))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Result in the loss of forest land or conversion of forest land to non-forest use?                                                                                                                                                                                                       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?                                                                               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

**No Impact.** The Project Site is located in an urbanized area of the City of Los Angeles. As discussed in the Project Description of this Initial Study, the Project Site is currently developed with buildings, sheds and surface parking areas. In addition, the uses surrounding the Project Site include commercial, industrial and residential uses. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are also not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.<sup>3</sup> As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** The Project Site is zoned by the LAMC as M3-1-RIO (Heavy Industrial Zone, River Improvement Overlay District), which permits a variety of commercial and industrial uses. The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.<sup>4</sup> Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** As previously discussed, the Project Site is located in an urbanized area and is currently developed with buildings, sheds and surface parking areas. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for heavy industrial uses. The Project Site is not zoned for forest land and is not used as forest land.<sup>5</sup> Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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<sup>3</sup> City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166003006, 5166003010, and 5166003012, <http://zimas.lacity.org/>, accessed March 2, 2018.

<sup>4</sup> California Department of Conservation, Los Angeles County Williamson Act FY 2015/2016, 2016.

<sup>5</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5166003006, 5166003010, and 5166003012, <http://zimas.lacity.org/>, accessed March 2, 2018.

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

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

**e) 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.** The Project Site is located in an urbanized area of the City of Los Angeles and does not include farmland. The Project Site and surrounding area are not mapped as farmland, are not zoned for farmland or agricultural use, and do not contain any agricultural uses.<sup>6</sup> As such, the Project would not result in the conversion of farmland to non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

|                                                                                                                                                                                                                                                                                             | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|------------------------------------|--------------------------|
| <b>III. AIR QUALITY.</b> Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:                                                      |                                      |                                                                |                                    |                          |
| a. Conflict with or obstruct implementation of the applicable air quality plan?                                                                                                                                                                                                             | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input type="checkbox"/> |
| b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?                                                                                                                                                                          | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input type="checkbox"/> |
| c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input type="checkbox"/> |
| d. Expose sensitive receptors to substantial pollutant concentrations?                                                                                                                                                                                                                      | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input type="checkbox"/> |

<sup>6</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5166003006, 5166003010, and 5166003012, <http://zimas.lacity.org/>, accessed March 2, 2018.

|                                                                         | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact  | No Impact                |
|-------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|-------------------------------------|--------------------------|
| e. Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**a) Conflict with or obstruct implementation of the Air Quality Plan?**

**Potentially Significant Impact.** The Project Site is located within the 6,700-square-mile South Coast Air Basin (the Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [PM<sub>2.5</sub>], and lead<sup>7</sup>). The SCAQMD's 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.<sup>8</sup> With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area.

Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on the SCAQMD's implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project's consistency with the SCAQMD's AQMP.

**b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?**

**Potentially Significant Impact.** The Project would result in increased air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Construction-related pollutants would be associated with sources such as construction worker vehicle trips, the operation of construction equipment, site grading and preparation activities, and the application of architectural coatings. During Project operation, air pollutants would be emitted on a daily basis from motor vehicle travel, natural gas consumption, and other on-site activities. Therefore, air quality standards could be violated and the EIR will provide further analysis of the Project's construction and operational air pollutant emissions.

<sup>7</sup> Partial Nonattainment designation for lead for the Los Angeles County portion of the Basin only.

<sup>8</sup> SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

**c) Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, PM10, and PM2.5) under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?**

**Potentially Significant Impact.** As discussed above, construction and operation of the Project would result in the emission of air pollutants in the Basin, which is currently in non-attainment of federal air quality standards for ozone, PM<sub>2.5</sub> and lead, and State air quality standards for ozone, particulate matter less than 10 microns in size (PM<sub>10</sub>), and PM<sub>2.5</sub>. Therefore, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. The EIR will provide further analysis of cumulative air pollutant emissions associated with the Project.

**d) Expose sensitive receptors to substantial pollutant concentrations?**

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

**e) Create objectionable odors affecting a substantial number of people?**

**Less Than Significant Impact.** No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people.

With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses, as the Project would include residential live/work, office, restaurant, and retail uses. In addition, the proposed restaurant uses would comply with SCAQMD Rule 1138 regarding restaurant emissions. On-site trash receptacles would also be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts. Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.<sup>9</sup>

Construction and operation of the Project would also comply with SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air

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<sup>9</sup> SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, [www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust](http://www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust), accessed March 2, 2018.

contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.<sup>10</sup>

Based on the above, the potential odor impact during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

|                                                                                                                                                                                                                                                                                                                  | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact  | No Impact                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|-------------------------------------|-------------------------------------|
| <b>IV. BIOLOGICAL RESOURCES.</b> Would the project:                                                                                                                                                                                                                                                              |                                      |                                                                |                                     |                                     |
| a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?                                                                 | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?                                             | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?                                                                               | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?                                                                                                                                                                              | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

<sup>10</sup> SCAQMD, Rule 402, Nuisance, [www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf](http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf), accessed March 2, 2018.

|                                                                                                                                                                                      | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|------------------------------------|-------------------------------------|
| f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

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

**Less Than Significant Impact.** The Project Site is located in an urbanized area and is currently developed with buildings, sheds and surface parking. Landscaping is limited, consisting of 16 ornamental trees and ornamental shrubs within portions of the Project Site.<sup>11</sup> Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Based on the lack of habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife<sup>12</sup> or by the U.S. Fish and Wildlife Service<sup>13</sup> would be present on-site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles.<sup>14</sup> Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

**No Impact.** The Project Site is located in an urbanized area and is currently developed with buildings, sheds and surface parking. No riparian or other sensitive natural community exists on the

<sup>11</sup> Carter, Romanek Landscape Architects, Inc., 2143 Violet St. Los Angeles, Existing Tree Survey, April 16, 2018. See Appendix IS-1.

<sup>12</sup> California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, October 2017.

<sup>13</sup> United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, <https://ecos.fws.gov/ecp0/reports/species-listed-by-state-report?state=CA&status=listed>, accessed February 26, 2018.

<sup>14</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

Project Site.<sup>15,16</sup> Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.<sup>17,18,19</sup> In addition, there are no other sensitive natural communities identified by the California Department of Fish and Game or the US Fish and Wildlife Service.<sup>20,21,22</sup> Although the Project Site is in proximity to the Los Angeles River (LA River), development of the Project would not have an adverse effect on any riparian habitat within the LA River since the only areas that presently support riparian habitat are the Sepulveda Basin and the Glendale Narrows.<sup>23</sup> Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**c) 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.** The Project Site is located in an urbanized area and is currently developed with buildings, sheds and surface parking. In addition, the surrounding area has been fully developed, and the Los Angeles River further to the east of the Project Site is concrete lined. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site.<sup>24</sup> As such, the Project would not have an adverse effect on federally protected wetlands. No impact would occur, and no mitigation measures are required. Therefore, no further evaluation of this topic in an EIR is required.

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<sup>15</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5166003006, 5166003010, and 5166003012, <http://zimas.lacity.org/>, accessed March 2, 2018.

<sup>16</sup> United States Environmental Protection Agency, NEPAassist, <https://nepassistentool.epa.gov/nepassistent/nepamap.aspx>, accessed February 26, 2018.

<sup>17</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

<sup>18</sup> City of Los Angeles, Los Angeles River Revitalization, Ecosystem, <http://lariver.org/ecosystem>, accessed February 26, 2018.

<sup>19</sup> Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

<sup>20</sup> California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), <https://map.dfg.ca.gov/bios/>, accessed March 2, 2018.

<sup>21</sup> California Department of Fish and Wildlife, CDFW Lands, <https://map.dfg.ca.gov/lands/>, accessed March 2, 2018.

<sup>22</sup> United States Fish and Wildlife Service, National Wetlands Inventory, <https://www.fws.gov/wetlands/data/Mapper.html>, accessed March 2, 2018.

<sup>23</sup> City of Los Angeles, Los Angeles River Revitalization, Ecosystem, <http://lariver.org/ecosystem>, accessed February 26, 2018.

<sup>24</sup> United States Environmental Protection Agency, NEPAassist, <https://nepassistentool.epa.gov/nepassistent/nepamap.aspx>, accessed February 26, 2018.

**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?**

**Less Than Significant Impact.** As described above, the Project Site is located in an urbanized area and is currently developed with buildings, sheds and surface parking. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open spaces areas and which may serve as wildlife corridors. While the Los Angeles River is located further to the east of the Project Site, it is concrete-lined in its nearest stretch and is separated from the Project Site by rail facilities and fences. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.<sup>25,26,27</sup>

Although unlikely, the 16 on-site trees that would be removed during construction of the Project could potentially provide nesting sites for migratory birds. However, the Project would comply with the Migratory Bird Treaty Act, which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. In accordance with the Migratory Bird Treaty Act, tree removal activities would take place outside of the nesting season (February 15–September 15), to the extent feasible. Should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a 300-foot buffer (500 feet for raptors) would be established until the fledglings have left the nest. With compliance with the Migratory Bird Treaty Act, the impact would be less than significant.

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

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

**Less Than Significant Impact.** The City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least 4 inches in diameter at breast height. These tree species are defined as

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

<sup>26</sup> City of Los Angeles, Los Angeles River Revitalization, Ecosystem, <http://lariver.org/ecosystem>, accessed February 26, 2018.

<sup>27</sup> Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

“protected” by the City of Los Angeles. Trees that have been planted as part of a tree planting program are exempt from this Ordinance and are not considered protected. The Ordinance prohibits, without a permit, the removal of any regulated protected tree, including “acts which inflict damage upon root systems or other parts of the tree...” and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety.

Landscaping within the Project Site is limited, consisting of 16 ornamental trees and ornamental shrubs within portions of the Project Site. There are no street trees along the Project perimeter. Of the on-site tree species, only one tree, a *Platanus Racemosa* (Sycamore), is of a species that is protected by the LAMC.<sup>28</sup> The removal of this protected tree is subject to City approval under Ordinance No. 177404, which also requires that this tree be replaced on a 2:1 basis in accordance with the City’s requirements set forth in Ordinance No. 177404. The remaining on-site trees, which consist of *Morus Alba* (Fruitless Mulberry), *Eucalyptus Viminalis* (Manna Gum), *Grevillea Robusta* (Silver Oak), *Cedrus Deodara* (Deodar Cedar), and *Schinus Molle* (California Pepper) tree species, would be replaced on a 1:1 basis in accordance with the Department of City Planning’s policy. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** The Project Site is located in an urbanized area and is currently developed with buildings, sheds and surface parking. As previously described, landscaping within the Project Site is limited, consisting of ornamental trees and shrubs within portions of the Project Site. As described above, the Project Site does not support any habitat or natural community.<sup>29,30</sup> The Project Site is located west of the Los Angeles River and is within the River Improvement Overlay (RIO) District, Outer Core.<sup>31</sup> Development of the Proposed Project would comply with the applicable development standards and guidelines for the RIO District, including landscaping guidelines, which would ensure that the Proposed Project does not conflict with a conservation plan. No other Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.<sup>32</sup> Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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<sup>28</sup> Carter, Romanek Landscape Architects, Inc., 2143 Violet St. Los Angeles, Existing Tree Survey, April 16, 2018. See Appendix IS-1.

<sup>29</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5166003006, 5166003010, and 5166003012, <http://zimas.lacity.org/>, accessed March 2, 2018.

<sup>30</sup> United States Environmental Protection Agency, NEPAassist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed February 26, 2018.

<sup>31</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5166003006, 5166003010, and 5166003012, <http://zimas.lacity.org/>, accessed March 2, 2018.

<sup>32</sup> California Department of Fish and Wildlife, California Regional Conservation Plans, July 2017.

| Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact |
|--------------------------------------|----------------------------------------------------------------|------------------------------------|-----------|
|--------------------------------------|----------------------------------------------------------------|------------------------------------|-----------|

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

- |                                                                                                                |                                     |                          |                          |                          |
|----------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?    | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?        | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Disturb any human remains, including those interred outside of dedicated cemeteries?                        | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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

**Potentially Significant Impact.** Section 15064.5 of the CEQA Guidelines generally defines a historic resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code). In addition, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register.

Based on their age, the existing buildings on the Project Site have the potential to be historical resources. In addition, known resources in the Project vicinity include the Ford Factory building, National Biscuit Company Building, and the Seventh Street Bridge.<sup>33,34</sup> Therefore, the EIR will provide further analysis of the Project's potential to result in direct and indirect impacts to historical resources.

<sup>33</sup> Historic Places LA, [www.historicplacesla.org/map](http://www.historicplacesla.org/map), accessed March 2, 2018.

<sup>34</sup> Ford Factory, <http://thefordfactoryla.com/history.php>, accessed March 2, 2018.

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

**Potentially Significant Impact.** Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within a highly urbanized area and has been subject to grading and development in the past. Thus, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Nevertheless, the Project would require grading, excavation up to 77 feet below grade, and other construction activities that could have the potential to disturb previously undiscovered archaeological resources. Therefore, the EIR will provide further analysis of the Project’s potential impacts to archaeological resources.

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

**Potentially Significant Impact.** The Project Site is currently developed with buildings, sheds and surface parking and there are no unique geologic features on the Project Site. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Although the Project Site has been previously graded and developed, the Project would require grading and excavation to greater depths than those having previously occurred (i.e., up to 77 feet below grade) which would have the potential to disturb undiscovered paleontological resources that may exist within the Project Site. Therefore, the EIR will provide further analysis of the Project’s potential impacts to paleontological resources.

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

**Potentially Significant Impact.** As discussed above, the Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. Nevertheless, as the Project would require excavation at depths greater than those having previously occurred (i.e., up to 77 feet below grade) on the Project Site, the potential exists for the Project to uncover human remains. Therefore, the EIR will provide further analysis of this topic.

| Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact |
|--------------------------------------|----------------------------------------------------------------|------------------------------------|-----------|
|--------------------------------------|----------------------------------------------------------------|------------------------------------|-----------|

**VI. 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:                                                                                                                                                                                                                                                          |                          |                          |                                     |                                     |
| i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?                                                                                                                                                                                                                                                      | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?                                                                                                                                                                                                                           | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?                                                                                                                                                                                                                                                                        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b. Result in substantial soil erosion or the loss of topsoil?                                                                                                                                                                                                                                                                                                                             | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, caused in whole or in part by the project's exacerbation of the existing environmental conditions?                                                            | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?                                                                                                                                        | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?                                                                                                                                                                                                      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

The following analysis uses the Geotechnical Investigation prepared for the Project by Geocon West, Inc., dated February 23, 2017. All specific information on geologic and soils conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-2 of this Initial Study.

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District* (CBIA v. BAAQMD), held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the project would have a significant impact related to geology and soils if it would result in any of the following impacts.

**a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**

- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.**

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

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

Based on City data, the closest fault is the Puente Hills Blind Thrust Fault, located approximately 0.8 mile (1.29 kilometers) from the Project Site.<sup>35,36</sup> In addition, based on the Geotechnical Investigation, the closest active fault is the Coyote Fault located approximately 1.5 miles to the east. The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, or within a City-designated Fault Rupture Study Area.<sup>37</sup> Therefore, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site, and the potential for surface rupture due to faulting occurring beneath the Project Site is considered low. Moreover, the Project would not exacerbate existing fault rupture conditions. The Project is typical of urban environments and would not involve mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions or stresses in the Earth's crust. Furthermore, as discussed above, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Thus, the Project would not exacerbate existing environmental conditions related to fault rupture. Therefore, impacts associated with surface rupture from a known earthquake fault would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**ii) Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?**

**Less Than Significant Impact.** As described above, the Project Site is located within the seismically active region of Southern California and would potentially be subject to strong ground motion if a moderate to strong earthquake occurs on a local or regional fault. The potentially significant impacts related to seismic ground shaking at the Project Site would not be exacerbated by the Project because the Project would not involve mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions that would exacerbate ground shaking. Furthermore, as discussed above, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, impacts associated with seismic ground shaking would be less than significant, and no mitigation measures are required.

The following discussion about building and seismic codes is provided for informational purposes. Engineering design solutions reduce the substantial risk of exposing people or structures to loss or injury. As discussed in detail below, state and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. The Geotechnical Investigation contains preliminary recommendations for the type of engineering practices that would be used. Additionally, a final design-level geotechnical report will be prepared by the Project Applicant and reviewed to the satisfaction of the Department of Building and Safety before the issuance of grading permits. The final recommendations from that report will be enforced for the

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<sup>35</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5166003006, 5166003010, and 5166003012, <http://zimas.lacity.org/>, accessed March 2, 2018.

<sup>36</sup> The Puente Hills Blind Thrust Fault is a buried fault with no surface trace, so variances in interpretation of the distance may occur. The distance provided in ZIMAS is the most conservative estimate.

<sup>37</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5166003006, 5166003010, and 5166003012, <http://zimas.lacity.org/>, accessed March 2, 2018.

construction of the Project. Based on the Geotechnical Investigation, the Project Site is suitable for development, and the Project may be constructed using standard, accepted, and proven engineering practices considering the seismic shaking potential and geologic conditions at the Project Site. As with other development projects in the Southern California region, the Project would comply with the Los Angeles Building Code (LABC), which incorporates current seismic design provisions of the 2016 California Building Code with City amendments. The 2016 California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety is responsible for implementing the provisions of the LABC. The Project would also be required to comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety, including the recommendations provided in a final, site-specific geotechnical report. In addition, the state and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project.

Based on the above, development of the Project would not exacerbate existing seismic conditions on the Project Site. Impacts associated with seismic ground shaking would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

**iii) Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?**

**Less Than Significant Impact.** Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low density, fine, clean sandy soils; and strong ground motion. Effects of liquefaction can include sand boils, settlement, and bearing capacity failures below structural foundations.

Neither the City of Los Angeles or the State of California classifies the Project Site as part of a potentially liquefiable area.<sup>38,39</sup> In addition, due to the presence of dense to very dense granular soils below the anticipated foundation level of the proposed building and the relatively deep groundwater table (i.e., over 150 feet below grade), the potential for liquefaction is considered very low. Due to the depth of the historical highest groundwater level, the type of soils underlying the Project Site, and the liquefaction mapping by the City and State, the Project Site would not be susceptible to liquefaction during an earthquake event. Therefore, based on these considerations, the Project would not exacerbate existing environmental conditions and cause or accelerate geologic hazards related to liquefaction, which would result in substantial damage to structures or infrastructure, or expose people

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<sup>38</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5166003006, 5166003010, and 5166003012, <http://zimas.lacity.org/>, accessed March 2, 2018.

<sup>39</sup> State of California, California Geological Survey, Seismic Hazard Zones. Los Angeles Quadrangle, March 25, 1999.

to substantial risk of injury. As such, impacts associated with liquefaction would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**iv) Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?**

**No Impact.** Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and generally characterized by flat topography. In addition, the Project Site is not located in a landslide area as mapped by the State,<sup>40</sup> nor is the Project Site mapped as a landslide area by the City of Los Angeles.<sup>41,42</sup> Development of the Project would not substantially alter the existing topography of the Site. Specifically, the Project Site would remain flat and would not cause landslides. Therefore, the Project would not exacerbate existing conditions that would result in the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** Development of the Project would require grading and excavation and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. Although Project development has the potential to result in the erosion of soils, this potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from the City's Department of Building and Safety, which would include requirements and standards designed to limit potential impacts associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills. Furthermore, as discussed further below in the response to Response to Checklist Question IX.a., the Project would be required to comply with the City's Low Impact Development (LID) ordinance and the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operations, the potential is relatively low since the Project Site would be fully developed and no soils would be left exposed. Therefore, with compliance with applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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<sup>40</sup> State of California, California Geological Survey, Seismic Hazard Zones. Los Angeles Quadrangle, March 25, 1999.

<sup>41</sup> Los Angeles General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, p. 51.

<sup>42</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5166003006, 5166003010, and 5166003012, <http://zimas.lacity.org/>, accessed March 2, 2018.

**c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, caused in whole or in part by the project's exacerbation of the existing environmental conditions?**

**Less Than Significant Impact.** As discussed above, the Project Site is not located near slopes or geologic features that would result in on- or off-site landsliding or lateral spreading. Additionally, as discussed in greater detail in Response to Checklist Question VI.a.iii above, based on the depth to groundwater, liquefaction is unlikely at the Project Site. Furthermore, as discussed in the Geotechnical Investigation, no large-scale extraction of groundwater, gas, oil or geothermal energy is occurring or planned at the Project Site or in the general site vicinity. Therefore, there is little or no potential for ground subsidence to occur at the Project Site.<sup>43</sup> As such, the Project would not exacerbate existing conditions since it would not cause a geologic unit or soil to become unstable. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**d) Be located on expansive soil, as defined in Table 18.1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?**

**Less Than Significant Impact.** Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The Project Site is underlain by up to 5 feet of artificial fill, with Quaternary-age alluvial deposits below. The artificial fill is characterized as slightly moist with firm or medium density. It generally consists of yellowish brown sandy silt to silty sand with trace gravel. The fill is likely the result of past grading or construction activities at the site.<sup>44</sup> The deeper Quaternary-age alluvial deposits consist of poorly graded sand, sand with silt, silty sand, clayey silt, and varying amounts of fine to coarse gravel.<sup>45</sup> The Project Site is within the ancestral flood plain of the Los Angeles River and, although gravel and cobbles were only locally encountered in borings, zones of cobbles and boulders may be encountered during construction.

Based on the depth of excavation, the Geotechnical Investigation concludes that the proposed structure would not be prone to the effects of expansive soils. If encountered, expansive soils would be removed during excavation. In addition, the Project would not increase the expansion potential of these soils. Furthermore, with the incorporation of site-specific geotechnical recommendations, impacts related to expansive soils would not be exacerbated by the Project and, thus, would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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<sup>43</sup> Appendix IS-2, p. 9.

<sup>44</sup> Appendix IS-2, p. 2.

<sup>45</sup> Appendix IS-2, p. 3.

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

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

|                                                                                                                                  | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact                |
|----------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|------------------------------------|--------------------------|
| <b>VII. GREENHOUSE GAS EMISSIONS.</b> Would the project:                                                                         |                                      |                                                                |                                    |                          |
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?      | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input type="checkbox"/> |
| b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input type="checkbox"/> |

**a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

**Potentially Significant Impact.** Gases that trap heat in the atmosphere are called greenhouse gases since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere affects the earth's temperature. The State 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 Project, including construction and operational activities, could result in greenhouse gas emissions that may have a significant impact on the environment. Therefore, the EIR will provide further analysis of the Project's greenhouse gas emissions.

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

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

|                                                                                                                                                                                                                                                                                                                             | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact  | No Impact                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|-------------------------------------|-------------------------------------|
| <b>VIII. HAZARDS AND HAZARDOUS MATERIALS.</b>                                                                                                                                                                                                                                                                               |                                      |                                                                |                                     |                                     |
| Would the project:                                                                                                                                                                                                                                                                                                          |                                      |                                                                |                                     |                                     |
| a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?                                                                                                                                                                                     | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?                                                                                                                             | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?                                                                                                                                                             | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions? | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?                                                            | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?                                                                                                                                                                 | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?                                                                                                                                                                                                   | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including, where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands, caused in whole or in part from the project's exacerbation of existing environmental conditions?      | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

The following analysis is based, in part, on the *Phase I Environmental Site Assessment* (Phase I ESA) prepared for the Project by Advantage Environmental Consultants, LLC, dated July 18,

2016. All specific information on historic and existing on-site conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-3 of this Initial Study.

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

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

**Less Than Significant Impact.** The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential and commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed residential and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. All potentially hazardous materials to be used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions and handled in accordance with all applicable standards and regulations, including but not limited to, those set forth by the federal and State Occupational Safety and Health Acts. Such requirements include obtaining material safety data sheets from chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train employees about hazardous materials. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

**b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

**Less Than Significant Impact.** The Phase I ESA included a review of environmental records for the Project Site and a site reconnaissance to identify potential on-site hazards. A review of fire insurance maps and aerial photographs revealed that the Project Site was developed with structures for baled cotton storage and parking well before 1950. By 1960, warehouses were added along the western and southeastern corners of the site.

During the site reconnaissance visit no evidence of hazardous substances, aboveground storage tanks (ASTs) or underground storage tanks (USTs), floor drains, drums, stains or corrosion, unidentified substance containers, wastewater discharge systems, stressed vegetation, unusual odors, or pits, ponds, or lagoons were identified on-site.<sup>46</sup> One pole-mounted electrical transformer was observed in the northern area of the Project Site, but it was not labeled with respect to polychlorinated biphenyl (PCB) content and appeared to be in good condition with no stains or corrosion. Minor amounts of demolition debris were noted at the western area of the Project Site and household debris were noted at the eastern area, but no concerning conditions were noted. Soil piles were also noted in the vicinity of the structure at the western area of the Project Site, but no concerning conditions were noted.<sup>47</sup>

Based on the age of the existing buildings on-site, there is a possibility that asbestos-containing materials (ACM) and lead-based paint (LBP) may be encountered during construction. In the event any suspect ACM or LBP is found, the Project would adhere to all federal, state, and local regulations prior to their removal. These regulations include, but are not limited to, the Toxic Substances Control Act (TSCA), the Resource Conservation and Recovery Act (RCRA), the federal and state Occupational Safety and Health Acts, SCAQMD Rule 1403 pertaining to asbestos emissions from renovation/demolition activities, and the Residential Lead-Based Paint Reduction Act. Mandatory compliance with applicable federal and State standards and procedures would reduce risks associated with ACM and LBP to less than significant levels.

The current uses on the Project Site and adjoining properties are not ones that are indicative of the use, treatment, storage, disposal, or generation of significant quantities of hazardous substances or petroleum products. As described above and in the Phase I ESA, no evidence or record of on-site underground storage tanks or aboveground storage tanks was found. In the event an undocumented UST is identified on-site, it would be appropriately documented and removed according to Los Angeles Fire Department (LAFD) regulations.

According to the Geotechnical Investigation, the Project Site is not located in a Methane Buffer Zone identified by the City.<sup>48</sup> In addition, no recognized environmental concerns (RECs) or historic recognized environmental concerns (HRECs) were identified on the Project Site.<sup>49</sup>

In addition, the Project would include excavations to a maximum depth of approximately 77 feet below ground surface (bgs) and would result in a net export of existing soil material. Although not anticipated at the Project Site, any contaminated soils found would be removed from the Project Site and remediated at an approved disposal facility in accordance with regulatory requirements.<sup>50</sup>

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<sup>46</sup> Appendix IS-3, p. 16.

<sup>47</sup> Appendix IS-3, p. 17.

<sup>48</sup> Appendix IS-2, p. 9.

<sup>49</sup> Appendix IS-3, p. 13 and 19.

<sup>50</sup> KPFF Consulting Engineers, Onni Violet Street Project (2143 Violet Street, Los Angeles, CA 90021) – Hydrology and Water Resources Technical Report, February 27, 2018 p. 27. See Appendix IS-4.

Based on the above, with compliance with regulatory requirements, the Project would not result in a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** Metropolitan High School is located approximately 0.25 mile to the west of the Project Site at 727 Wilson Street. Notwithstanding, as discussed above, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential and commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed residential and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, all materials during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations including, but not limited to, federal and State Occupational Safety and Health Act requirements discussed above in Response to Checklist Question VIII.a. As such, the use of such materials would not create a significant hazard to nearby schools. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

**d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment, caused in whole or in part from the project's exacerbation of existing environmental conditions?**

**Less Than Significant Impact.** Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions or extensive investigations are planned or have occurred. The database provides a listing of federal superfund sites, State response sites, voluntary cleanup sites, and school cleanup sites.

The Project Site was not listed on any of the standard regulatory databases searched when the Phase I ESA was conducted.<sup>51</sup> The database search also included searches for State voluntary Cleanup Sites, State Landfill and/or Solid Waste Disposal Sites, USTs, and hazardous materials. Several properties were identified within 0.12 mile of the Project Site that are listed on the State Registered Storage Tank (UST), Emergency Response Notification System (ERNS), RCRA Generators, and EnviroStor databases.<sup>52</sup> However, none of these listings are considered to be environmental concerns for the Project Site.<sup>53</sup> The Project would not exacerbate existing conditions associated with these listed items because the Project Site itself is not listed on any of the databases that were reviewed in the Phase I ESA.

Additionally, the types and amounts of hazardous materials used during operation of the proposed residential and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. All potentially hazardous materials to be used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations.

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

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

**No Impact.** The Project Site is not located within an area subject to an airport land use plan or within 2 miles of an airport. The closest airport to the Project Site is Los Angeles International Airport (LAX), located approximately 12 miles southwest of the Project Site. Given the distance between the Project Site and LAX, the Project would not have the potential to result in a safety hazard. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required. With regard to potential impacts to air traffic, see Checklist Question XVI.c, Transportation/Circulation, below.

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<sup>51</sup> Appendix IS-3, p. 8-9.

<sup>52</sup> Appendix IS-3, p. 8-9.

<sup>53</sup> Appendix IS-3, p. 8-9.

**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.** The Project Site is not located within the vicinity of a private airstrip. The nearest private airstrip is the Los Alamitos Army Airfield, located approximately 19.5 miles southeast of the Project Site. Given the distance between the Project Site and the Los Alamitos Army Airfield, the Project would not have the potential to result in a safety hazard. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** According to the Safety Element of the City of Los Angeles General Plan, the nearest disaster routes to the Project Site are the Hollywood Freeway (US-101), the Santa Monica Freeway (I-10), and the Golden State Freeway (I-5), which are all accessible within less than 1 mile of the Project Site. Alameda Street is also a designated disaster route located approximately 0.5 mile east of the Project Site.<sup>54</sup> While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access.

As discussed above, the closest disaster routes include Alameda Street, US-101, I-10, and I-5, which are all less than 1 mile from the Project Site. Operation of the Project would generate traffic in the Project vicinity and would result in some modifications to site access. Specifically, vehicular access to the subterranean parking areas would be provided via a driveway along Violet Street within the southeastern corner of the Project Site. However, the Project would comply with LAFD access requirements and operation of the Project would comply with all applicable LAFD regulations regarding safety. Therefore, the Project would not impede emergency access within the Project vicinity or cause an impediment along the City's designated disaster routes such that it would impair the implementation of the City's emergency response plan. Impacts related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

**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, caused in whole or in part from the project's exacerbation of existing environmental conditions?**

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<sup>54</sup> Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.

**Less Than Significant Impact.** There are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone,<sup>55</sup> nor is it located within a City-designated fire buffer zone.<sup>56</sup> Therefore, the Project would not exacerbate conditions that would subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Furthermore, the Project would be developed and rehabilitated in accordance with LAMC requirements pertaining to fire safety. Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; Section 57.118 of the LAMC establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects; and Section 57.507.3.1 establishes fire water flow standards. Additionally, the proposed residential and commercial uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

|                                                                                                                                                                                                                                                                                                                                                                                               | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact  | No Impact                |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|-------------------------------------|--------------------------|
| <b>IX. HYDROLOGY AND WATER QUALITY.</b> Would the project:                                                                                                                                                                                                                                                                                                                                    |                                      |                                                                |                                     |                          |
| a. Violate any water quality standards or waste discharge requirements?                                                                                                                                                                                                                                                                                                                       | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Substantially deplete groundwater supplies or interfere 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)? | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?                                                                                                                                                            | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

<sup>55</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5166003006, 5166003010, and 5166003012, <http://zimas.lacity.org/>, accessed March 2, 2018. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

<sup>56</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

|                                                                                                                                                                                                                                                                           | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact  | No Impact                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|-------------------------------------|-------------------------------------|
| d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?                                                                                     | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| f. Otherwise substantially degrade water quality?                                                                                                                                                                                                                         | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?                                                                                                      | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?                                                                                                                                                                       | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?                                                                                                        | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| j. Inundation by seiche, tsunami, or mudflow?                                                                                                                                                                                                                             | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

The following analysis is based, in part, on the Hydrology and Water Resources Technical Report (Water Resources Report) prepared for the Project by KPFF Consulting Engineers, dated February 27, 2018. All specific information on hydrology and water quality conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-4 of this Initial Study.

**a) Violate any water quality standards or waste discharge requirements?**

**Less Than Significant Impact.** During construction of the Project, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Therefore, Project-related construction activities could potentially result in adverse effects on water quality. However, as Project construction would disturb more than one acre of soil, the Project would be required to obtain coverage under the NPDES Construction General Permit (Order No. 2009-0009-DWQ, as well as its subsequent

amendments 2010-0014-DWQ and 2012-0006-DWQ) pursuant to NPDES requirements. In accordance with the requirements of the permit, a Stormwater Pollution Prevention Plan (SWPPP) would be developed and implemented during construction of the Project. The SWPPP would set forth Best Management Practices (BMPs), including erosion control, sediment control, non-stormwater management, and materials management measures, to minimize the discharge of pollutants in stormwater runoff. The SWPPP would be carried out in compliance with State Water Resources Control Board requirements and would also be subject to review by the City for compliance with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities.

In addition, project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC) to reduce the effects of sedimentation and erosion. Prior to the issuance of a grading permit, the Project Applicant would be required to provide the City with evidence that a Notice of Intent has been filed with the State Water Resources Control Board to comply with the Construction General Permit. With compliance with these existing regulatory requirements, construction of the Project would not result in discharge that would cause: (1) pollution which would alter the quality of the water of the State (i.e., Los Angeles River) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the water of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health, affect an entire community or neighborhood, or any considerable number of persons, and occurs during or as a result of the treatment or disposal of wastes. Furthermore, as discussed above, with compliance with NPDES, which requires the preparation of a SWPPP, construction of the Project would not result in discharges that would cause regulatory standards to be violated in the Los Angeles River Watershed. Thus, the temporary impacts to water quality during construction would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

Operation of the Project would introduce sources of potential stormwater pollution that are typical of residential, office, and retail uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with vehicular circulation areas). Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. However, the Project would implement BMPs for managing stormwater runoff in accordance with the current City of Los Angeles LID Ordinance requirements. Under section 3.1.3. of the City's LID Manual, post-construction stormwater runoff from new projects must be infiltrated, evapotranspired, captured and used, and/or treated through high efficiency BMPs onsite for the volume of water produced by the 85th percentile storm event. The Project would implement either a capture and use system, or biofiltration planters for managing stormwater runoff in accordance with current LID requirements. With compliance with these existing regulatory requirements, operation of the Project would not result in discharge that would cause: (1) pollution which would alter the quality of the water of the State (i.e., Los Angeles River) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the water of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health, affect an entire community or neighborhood, or any considerable number of persons, and occurs during or as a result of the treatment or disposal of wastes. Furthermore, with compliance with regulatory requirements, operation of the Project would not result in discharges that would cause regulatory standards to be violated. impacts on water quality

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

**b) 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)?**

**Less Than Significant Impact.** The historically highest groundwater level in the area is greater than 150 feet bgs. Perched groundwater was encountered in borings at depths of 74.8 and 76 feet bgs. Anticipated excavation depths up to 77 feet bgs would occur to provide for the new subterranean parking levels. Considering the historic high groundwater level, the depth to perched groundwater encountered, and the depth of the excavation, temporary dewatering may be required during construction. Groundwater discharges from dewatering operations can contain high levels of fine sediments, which if not properly treated, exceed NPDES requirements. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all relevant NPDES requirements related to construction and discharges from dewatering operations. Thus, construction of the Project would result in less than significant impacts related to groundwater would not substantially deplete groundwater supplies in a manner that would result in a net deficit in aquifer volume or lowering of the local groundwater table.

With regard to groundwater recharge, the percolation of precipitation that falls on pervious surfaces is variable, depending on the soil type, condition of the soil, vegetative cover, and other factors. The Project Site is currently approximately 86 percent impervious. With implementation of the Project, impervious surfaces would comprise approximately 93 percent of the Project Site. As part of the Project, a stormwater system would be implemented wherein the stormwater would discharge to an approved discharge point in the public right-of-way and not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow. In addition, since the Project Site is predominately impervious under existing conditions and would continue to be so upon completion of the Project, the amount of rainfall infiltration that would occur on the Project Site would be nominal and would not contribute to groundwater recharge. Thus, the Project would not interfere substantially with groundwater recharge such that there would be a net deficit in the aquifer volume or lowering of the local groundwater table. As such, impacts on groundwater would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

**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?**

**Less Than Significant Impact.** As discussed in the Water Resources Report, approximately 86 percent of the Project Site is currently covered with impervious surfaces. The Project Site is not crossed by any water courses or rivers. Currently, drainage within the southeast portion of the Project Site runs off as sheet flow while the north and west portions of the Project Site discharge primarily through roof drains. Stormwater runoff drains through the curb drains in 7th Place and through the

existing gutter in Violet Street both through direct runoff and through the alley on the western border of the site. The buildings on the western portion of the Project Site drain to the alley, and runoff then flows to Violet Street. In all cases, runoff then flows to existing drain pipes in Santa Fe Avenue.

Construction activities associated with the Project, which would involve grading, have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. However, as discussed above in Response to Checklist Question IX.a, in accordance with NPDES requirements the Project would implement a SWPPP that would specify BMPs and erosion/siltation control measures to be used during construction to manage runoff flows so that runoff would not impact off-site drainage facilities and receiving waters. In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion.

At buildout of the Project, the Project Site would be comprised of approximately 93 percent impervious areas. As shown in Table B-1 on page B-33, the total flow from the Project Site would be 6.9370 cubic feet per second (cfs). While there would be an incremental increase in the imperviousness of the Project site, this increase would not significantly increase the amount of runoff from the Project Site. Specifically, as shown in Table B-2 on page B-33, the expected total increase in runoff within the Project Site would be 0.0236 cfs. Furthermore, while a projected increase of 0.25 cfs would be discharged onto 7th place, a decrease of 0.23 cfs would be discharged onto Violet Street. As the increase in runoff in 7th Place represents an increase of less than 1 percent of the full-flow capacity of the downstream storm drain pipe, it is unlikely that this increase would cause flooding in 7th Place. In addition, given that the entire Project Site collects into the same storm drain network, most of this increase would be offset by the decrease in discharge onto Violet Street, which enters the network at the intersection of Violet Street and Santa Fe Avenue.

As part of LID compliance for the Project to manage post-construction stormwater runoff, the Project would include the installation of area drains, planter drains, and building roof drain downspouts throughout the Project Site and within the building to collect building, roof, and site runoff and direct stormwater through a series of storm drain pipes. This on-site stormwater treatment and conveyance system would serve to prevent onsite flooding and nuisance water on the Project Site.

Based on the above, through compliance with all applicable NPDES requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading regulations, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion, siltation, or on-site or off-site flooding would occur. Therefore, the impact would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

**Table B-1**  
**Proposed Drainage Stormwater Runoff Calculations**

| Drainage Area                        | Area<br>(acres) | Q50 (cfs)<br>(volumetric flow rate measured<br>in cubic feet per second) |
|--------------------------------------|-----------------|--------------------------------------------------------------------------|
| <b>Sub-Area A</b>                    |                 |                                                                          |
| Sub-Area A1 (Drains to Alley)        | 0.16015         | 0.5031                                                                   |
| Sub-Area A2 (Drains to Alley)        | 0.03992         | 0.1249                                                                   |
| Sub-Area A3 (Drains to Alley)        | 0.10696         | 0.3347                                                                   |
| <b>Sub-Area A Total</b>              | <b>0.30703</b>  | <b>0.9627</b>                                                            |
| <b>Sub-Area B</b>                    |                 |                                                                          |
| Sub-Area B1 (Drains to 7th Place)    | 0.29624         | 0.9306                                                                   |
| Sub-Area B2 (Drains to 7th Place)    | 0.02234         | 0.0702                                                                   |
| Sub-Area B3 (Drains to 7th Place)    | 0.46894         | 1.4667                                                                   |
| <b>Sub-Area B Total</b>              | <b>0.78752</b>  | <b>2.4675</b>                                                            |
| <b>Sub-Area C</b>                    |                 |                                                                          |
| Sub-Area C (Drains to Violet Street) | 1.12122         | 3.5068                                                                   |
| <b>Sub-Area C Total</b>              | <b>1.12122</b>  | <b>3.5068</b>                                                            |
| <b>SITE TOTAL</b>                    | <b>2.21577</b>  | <b>6.9370</b>                                                            |
| Source: KPFF, 2018.                  |                 |                                                                          |

**Table B-2**  
**Existing and Proposed Conditions Comparison**

| Drainage Area                       | Area<br>(acres) |                | Q50 (cfs)<br>(volumetric flow rate measured in<br>cubic feet per second) |               |               |
|-------------------------------------|-----------------|----------------|--------------------------------------------------------------------------|---------------|---------------|
|                                     | Existing        | Proposed       | Existing                                                                 | Proposed      | Delta         |
| Sub-Area A (Draining to alley)      | 0.30539         | 0.30703        | 0.9593                                                                   | 0.9627        | 0.35%         |
| Sub-Area B (Draining to 7th Pl.)    | 0.70611         | 0.31858        | 2.2165                                                                   | 2.4675        | +11.32%       |
| Sub-Area C (Draining to Violet St.) | 1.20427         | 1.59016        | 3.7377                                                                   | 3.5068        | -6.18%        |
| <b>SITE TOTAL</b>                   | <b>2.21577</b>  | <b>2.21577</b> | <b>6.9134</b>                                                            | <b>6.9370</b> | <b>+0.34%</b> |
| Source: KPFF, 2018.                 |                 |                |                                                                          |               |               |

**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?**

**Less Than Significant Impact.** No streams or rivers cross the Project Site. The Los Angeles River is located approximately 300 feet to the east and is separated from the Project Site by railways.

In addition, this segment of the Los Angeles River is concrete-lined. As discussed in Response to Checklist Question IX.c, above, the Project would not substantially increase the impervious surface area on the Project Site, and overall peak stormwater flows would be similar to existing flows and would be accommodated by the proposed stormwater treatment and conveyance system. Therefore, the Project would not substantially alter the existing drainage pattern of the site or area, or increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

**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?**

**Less Than Significant Impact.** As discussed above in Response to Checklist Question IX.a, the Project would implement capture and reuse or biofiltration to reduce stormwater pollution on the Project Site in accordance with the City's LID requirements. Furthermore, as discussed above in Response to Checklist Question IX.c, the Project's overall peak stormwater flows would be similar to existing flows and would be accommodated by the proposed stormwater treatment and conveyance system. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

**f) Otherwise substantially degrade water quality?**

**Less Than Significant Impact.** As discussed above in Response to Checklist Question IX.a, the Project would implement capture and reuse or biofiltration to reduce stormwater pollution on the Project Site in accordance with the City's LID requirements. Therefore, the Project would not substantially degrade water quality. Impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

**g) 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.** The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles.<sup>57,58</sup> Thus, the Project would not place housing within a 100-year flood hazard area. No impacts would occur, and no mitigation would be required. No further analysis of this topic in an EIR is required.

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<sup>57</sup> Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C1636F, effective September 26, 2008.

<sup>58</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit F, p. 57.

**h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?**

**No Impact.** As discussed above in Response to Checklist Question IX.g, the Project Site is not located within a designated 100-year flood plain area. Therefore, the Project would not place structures that would impede or redirect flood flows within a 100-year flood plain. No impacts would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

**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?**

**Less Than Significant Impact.** As discussed above, the Project Site is not located within a designated 100-year flood plain. The Safety Element of the City of Los Angeles General Plan does map the Project Site as being located within a potential Inundation Area.<sup>59</sup> The nearest levee is along the Los Angeles River located approximately 300 feet east of the Project Site.<sup>60</sup> The U.S. Army Corps of Engineers operates and maintains the 22.5-mile stretch of the Los Angeles River between Lankershim Boulevard in Hollywood and Stuart and Grey Road in Downey, which includes the portion adjacent to the Project Site.<sup>61</sup> Their maintenance activities include inspection and cleaning of the channel walls and removing vegetation growing in cracks and joints. In addition, the U.S. Army Corps of Engineers has directed repair of damaged embankments upstream to the Project Site and has installed barriers for those portions of the channel that were identified as at greatest risk of flood waters during the 2015/2016 El Nino storm season. With continued inspection, maintenance and flood control activities, the potential for substantial adverse impacts related to inundation at the Project Site due to proximity to the Los Angeles River would be less than significant. No further evaluation of this topic in an EIR is required.

**j) Inundation by seiche, tsunami, or mudflow?**

**No Impact.** A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement associated with large, shallow earthquakes. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity.

The Project Site is located approximately 14 miles east of the Pacific Ocean and the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.<sup>62</sup> The Los Angeles River is located approximately 300 feet to the east, but includes a sunken concrete lined channel and there are no major water-retaining structures that are

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<sup>59</sup> Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation & Tsunami Hazard Areas, p. 59.

<sup>60</sup> Appendix IS-4, p. 32.

<sup>61</sup> Appendix IS-4, p. 32.

<sup>62</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.

located immediately up-gradient from the Project Site. Thus, inundation as a result of seiche is considered low.<sup>63</sup> As discussed above, the Project Site and surrounding area are fully developed and generally characterized by flat topography. Given the fact that the Project Site is not mapped by either the State or the City as being located in an area prone to landslides, the potential for the Project Site to be inundated by mudflows is low.<sup>64</sup> Therefore, no seiche, tsunami, or mudflow events would be expected to impact the Project Site. No impacts would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

|                                                                                                                                                                                                                                                                                                             | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact  | No Impact                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|-------------------------------------|-------------------------------------|
| <b>X. LAND USE AND PLANNING.</b> Would the project:                                                                                                                                                                                                                                                         |                                      |                                                                |                                     |                                     |
| a. Physically divide an established community?                                                                                                                                                                                                                                                              | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input type="checkbox"/>            |
| c. Conflict with any applicable habitat conservation plan or natural community conservation plan?                                                                                                                                                                                                           | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**a) Physically divide an established community?**

**Less Than Significant Impact.** As discussed in the Project Description of this Initial Study, the Project Site is located in a highly urbanized area characterized by a mixture of low- and mid-rise buildings occupied by a mix of uses. The Project would replace several existing buildings with a new infill mixed-use project and would retain four existing buildings. All proposed development would occur within the boundaries of the Project Site as it currently exists and the Project does not propose a freeway or other large infrastructure that would divide a community. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

<sup>63</sup> Appendix IS-4, p. 32.

<sup>64</sup> See Checklist Question VI.a.iv. on page B-17.

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

**Potentially Significant Impact.** As discussed in the Project Description of this Initial Study, the Project requires discretionary approvals, including, but not limited to, a General Plan Amendment, a Vesting Zone and Height District Change, a Vesting Tentative Tract Map, and Vesting and Master Conditional Use Permits. The Project could potentially conflict with land use plans, policies or regulations that were adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the EIR will provide further analysis of the whether the Project conflicts with applicable land use plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect.

**c) Conflict with any applicable habitat conservation plan or natural community conservation plan?**

**No Impact.** The Project Site is located in an urbanized area and is currently developed with seven buildings, two sheds, and surface parking areas. As previously described, landscaping is limited, consisting of 16 trees and other ornamental landscaping within portions of the Project Site. As discussed above in Section IV, Biological Resources, the Project Site is located west of the Los Angeles River and is within the RIO District, Outer Core. Development of the Proposed Project would comply with the applicable development standards and guidelines for the RIO District, including landscaping guidelines, which would ensure that the Proposed Project does not conflict with a conservation plan. No other Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.<sup>65, 66</sup> Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

| Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact |
|--------------------------------------|----------------------------------------------------------------|------------------------------------|-----------|
|--------------------------------------|----------------------------------------------------------------|------------------------------------|-----------|

**XI. 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? ☐ ☐ ☐ ☒

<sup>65</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5166003006, 5166003010, and 5166003012, <http://zimas.lacity.org/>, accessed March 2, 2018.

<sup>66</sup> California Department of Fish and Wildlife, California Regional Conservation Plans, July 2017.

|                                                                                                                                                                       | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|------------------------------------|-------------------------------------|
| b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

**a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

**No Impact.** No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.<sup>67,68,69</sup> The Project Site is also not located within a City-designated oil field or oil drilling area.<sup>70</sup> In addition, according to the California Division of Oil, Gas and Geothermal Resources, the Project Site is not located within the limits of an oil field.<sup>71</sup> Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.<sup>72,73,74</sup> The Project Site is also not located within a City-designated oil field or oil drilling area.<sup>75,76</sup> Therefore, the Project would not result in the loss of availability of a

<sup>67</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

<sup>68</sup> State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

<sup>69</sup> City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

<sup>70</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit E, p. 55.

<sup>71</sup> California Department of Conservation, Division of Oil, Gas and Geothermal Resources, 2018, Well Finder, <https://maps.conservation.ca.gov/doggr/wellfinder/#close>, accessed March 1, 2018.

<sup>72</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

<sup>73</sup> State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

<sup>74</sup> City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

<sup>75</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit E, p. 55.

mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

|                                                                                                                                                                                                                                                                     | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|------------------------------------|-------------------------------------|
| <b>XII. NOISE.</b> Would the project result in:                                                                                                                                                                                                                     |                                      |                                                                |                                    |                                     |
| a. 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?                                                                                 | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input type="checkbox"/>            |
| b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?                                                                                                                                                             | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input type="checkbox"/>            |
| c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?                                                                                                                                      | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input type="checkbox"/>            |
| d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?                                                                                                                          | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input type="checkbox"/>            |
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?                                                                                                      | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

**a) 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 Impact.** During construction activities associated with the Project, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. In addition, because the Project would introduce new permanent residential and commercial uses to the Project Site, noise levels from on-site sources may also increase during operation of the Project. Furthermore, traffic attributable to the Project has the potential to increase

<sup>76</sup> California Department of Conservation, Division of Oil, Gas and Geothermal Resources, 2018, Well Finder, <https://maps.conservation.ca.gov/doggr/wellfinder/#close>, accessed March 1, 2018.

noise levels along adjacent roadways. Therefore, further evaluation of this topic will be provided in the EIR.

**b) Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?**

**Potentially Significant Impact.** Construction of the Project could generate groundborne noise and vibration associated with demolition, site grading, other clearing activities, the installation of building footings, and construction truck travel. As such, the Project would have the potential to generate and expose people to excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further evaluation of this topic will be provided in the EIR.

**c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

**Potentially Significant Impact.** As discussed in Response to Checklist Question XII.a., traffic and human activity associated with the Project, as described above, have the potential to increase ambient noise levels above existing levels. Therefore, further evaluation of this topic will be provided in the EIR.

**d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

**Potentially Significant Impact.** As discussed above in Response to Checklist Questions XII.a and XII.b, construction activities associated with the Project would have the potential to temporarily or periodically increase ambient noise levels above existing levels. Therefore, further evaluation of this topic will be provided in the EIR.

**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.** The Project Site is not located within an airport land use plan or within 2 miles of an airport. The closest airport to the Project Site is LAX, located approximately 12 miles southwest of the Project Site. Given the distance between the Project Site and LAX, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**f) For a project located 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.** The Project Site is not located within the vicinity of a private airstrip. The nearest private airstrip is the Los Alamitos Army Airfield, located approximately 19.5 miles southeast of the Project Site. Given the distance between the Project Site and the Los Alamitos Army Airfield, the Project would not expose people residing or working in the Project area to excessive noise levels.

Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**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)?**

**Less Than Significant Impact.** The Project would result in the construction of 347 new live/work units. As such, the Project would increase the residential population within the Project vicinity. As discussed above in Checklist Question III(a), Air Quality, SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to transportation, the economy, community development, and the environment. With regard to future growth, SCAG has prepared the 2016–2040 RTP/SCS, which provides population, housing, and employment projections for cities under its jurisdiction through 2040. The growth projections in the 2016–2040 RTP/SCS reflect the 2010 Census, employment data from the California Employment Development Department (EDD), population and household data from the California Department of Finance (DOF), and extensive input from local jurisdictions in SCAG's planning area. The Project Site is located in SCAG's City of Los Angeles Subregion. According to SCAG's 2016–2040 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2018 is approximately 4,009,193 persons.<sup>77</sup> In 2022, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,118,321 persons.<sup>78</sup> Therefore, the projected population growth between 2018 and 2022 is approximately 109,129 persons. The estimated household size for the City of Los Angeles is 2.43

<sup>77</sup> Based on a linear interpolation of 2012–2040 data.

<sup>78</sup> Based on a linear interpolation of 2012–2040 data.

persons per unit.<sup>79</sup> Applying this factor, development of 347 live/work units would result in an increase of approximately 843 new residents.<sup>80</sup> The Project would remove four of the ten existing units on the Project Site, which would reduce the existing residential population on-site to 14 residents.<sup>81</sup> Therefore, the Project would result in a net residential population of 833.<sup>82</sup> The estimated 833 net residents generated by the Project would represent approximately 0.76 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2018 and 2022. Furthermore, the Project does not include the through extension of roads or other infrastructure that would indirectly induce substantial population growth in the area. Therefore, the Project's residents would be well within SCAG's population projection for the City of Los Angeles Subregion.

According to the 2016–2040 RTP/SCS, the forecasted number of households for the City of Los Angeles Subregion in 2018 is approximately 1,403,671 households.<sup>83</sup> In 2022, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,455,786 households.<sup>84</sup> Therefore, the projected household growth in the City between 2018 and 2022 is approximately 52,114 households. The Project would add 347 new live/work units but would remove 4 existing live/work units on the Project Site. Thus, the Project's net total of 343 live/work units would constitute up to approximately 0.66 percent of the housing growth forecasted between 2018 and 2022. Therefore, the Project's housing units would be well within SCAG's housing projection for the Subregion.

The Project would generate approximately net new 961 employees based on employee generation rates developed by the Los Angeles Unified School District (LAUSD).<sup>85</sup> According to the 2016–2040 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2018 is approximately 1,797,693 employees.<sup>86</sup> In 2022, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,865,221 employees.<sup>87</sup> Therefore, the projected employment growth in the City between 2018 and 2022 is approximately 67,529 employees. Thus, the Project's estimated 961 net new employees would constitute approximately 1.42 percent of the employment growth forecasted between 2018 and 2022. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities.

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<sup>79</sup> Per correspondence with Jack Tsao from the Los Angeles Department of City Planning on March 8, 2018, based on the 2016 American Community Survey 5-year average estimate (2012–2016), the rate of persons per household for multiple-family units is 2.43 persons per unit.

<sup>80</sup> 347 live/work units X 2.43 persons per unit = 843 persons.

<sup>81</sup> 10 live/work units X 2.43 persons per unit = 24 persons. The Project would remove 4 existing units (4 units X 2.43 persons per unit = 10 persons).

<sup>82</sup> 843 new persons – 10 existing persons to be removed = 833 net population.

<sup>83</sup> Based on a linear interpolation of 2012–2040 data. SCAG forecasts “households,” not housing units. As defined by the U. S. Census Bureau, “households” are equivalent to occupied housing units.

<sup>84</sup> Based on a linear interpolation of 2012–2040 data.

<sup>85</sup> Los Angeles Unified School District, 2012 Developer Fee Justification Study, March 2017, Table 14.

<sup>86</sup> Based on a linear interpolation of 2012–2040 data.

<sup>87</sup> Based on a linear interpolation of 2012–2040 data.

As analyzed above, the net new population and housing that would be generated by the Project would be within SCAG's population and housing projections for the City of Los Angeles Subregion. Therefore, the Project would not induce substantial population or housing growth. Impacts related to population and housing would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required. With regard to cumulative population and housing impacts, please see Checklist Question XIX.b, below.

**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?**

**Less Than Significant Impact b. and c.** The Project would result in the removal of four live/work units. However, the Project would provide for 347 new live/work units and 6 six existing live/work units would remain. Thus, a total of 353 live/work units would be provided on-site upon Project completion. As such, the Project would not displace substantial numbers of existing housing units or people that would require the construction or replacement of housing elsewhere. Impacts would be less than significant and no mitigation measures are required. No further analysis of this topic in the EIR is required.

|                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact                |
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| <b>XIV. PUBLIC SERVICES.</b> 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: |                                      |                                                                |                                    |                          |
| a. Fire protection?                                                                                                                                                                                                                                                                                                                                                                                                                                   | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input type="checkbox"/> |
| b. Police protection?                                                                                                                                                                                                                                                                                                                                                                                                                                 | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input type="checkbox"/> |
| c. Schools?                                                                                                                                                                                                                                                                                                                                                                                                                                           | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input type="checkbox"/> |
| d. Parks?                                                                                                                                                                                                                                                                                                                                                                                                                                             | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input type="checkbox"/> |
| e. Other public facilities?                                                                                                                                                                                                                                                                                                                                                                                                                           | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input type="checkbox"/> |

*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:*

**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 fire protection?**

**Potentially Significant Impact.** The LAFD provides fire protection and emergency medical services for the Project Site. The Project would increase the building square footage on-site and increase the residential population, which could result in the need for new or physically altered LAFD facilities, the construction of which could cause significant environmental impacts. Therefore, further analysis of this issue will be included in the EIR.

**b) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered 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 police protection?**

**Potentially Significant Impact.** Police protection for the Project Site is provided by the City of Los Angeles Police Department. The Project would include the development of additional residential and commercial uses on the site that would increase the density at the Project Site, and increase the residential and daytime population in the service area. This could result in the need for additional police services and associated facilities, the construction of which could cause significant environmental impacts. Therefore, the EIR will provide further analysis of this issue.

**c) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered 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 schools?**

**Potentially Significant Impact.** The Project Site is located within the boundaries of the LAUSD. The Project would include the development of additional residential uses, which would generate a demand for educational services and school facilities, the construction of which could cause significant environmental impacts. Therefore, the EIR will provide further analysis of this issue.

**d) 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 parks?**

**Potentially Significant Impact.** The development of additional residential uses as part of the Project would increase the number of residents at the Project Site that could utilize nearby parks and/or recreational facilities, possibly necessitating new parks, the construction of which could cause significant environmental impacts. Thus, the EIR will provide further analysis of this issue.

**e) 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 other public facilities?**

**Potentially Significant Impact.** The development of additional residential uses as part of the Project would generate a new population that would generate a demand for library services provided by the Los Angeles Public Library, possibly necessitating the construction of new libraries which could cause significant environmental impacts. Therefore, the EIR will provide further analysis of this issue.

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## XV. RECREATION.

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

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

**Potentially Significant Impact.** The development of additional residential uses as part of the Project would increase the number of residents at the Project Site that could utilize City parks and/or recreational facilities, possibly resulting in the physical deterioration of those facilities. Thus, the EIR will provide further analysis of this issue.

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

**Potentially Significant Impact.** The Project would not include the development of public recreational facilities. However, the Project would increase the number of residents at the Project Site

that could utilize nearby recreational facilities, possibly necessitating the construction or expansion of new recreational facilities, which might have an adverse physical effect on the environment. Therefore, the EIR will provide further analysis of this topic.

Additionally, the Project would include development of private open space and recreational amenities associated with its residential component. The potential impacts associated with construction of these facilities are analyzed throughout this Initial Study, and will be further analyzed in the EIR for those topics where impacts could be potentially significant.

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

**a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation**

**system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

**Potentially Significant Impact.** The Project proposes development that would result in an increase in daily and peak-hour traffic within the vicinity of the Project Site. In addition, construction of the Project has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. Once construction is completed, the Project's residents, employees, and visitors would generate vehicle and transit trips throughout the day. The resulting increase in the use of the area's transportation facilities could 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. Therefore, further analysis of this issue will be provided in the EIR.

**b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

**Potentially Significant Impact.** Metro administers the Congestion Management Program (CMP), a State-mandated program designed to address the impacts urban congestion has on local communities and the region as a whole. The CMP provides an analytical basis for the transportation decisions contained in the State Transportation Improvement Project. The CMP for Los Angeles County requires an analysis of any Project that could add 50 or more trips to any CMP intersection or more than 150 trips to a CMP mainline freeway location in either direction during either the A.M. or P.M. weekday peak hours. Implementation of the Project has the potential to generate additional vehicle trips, which could potentially add more than 50 trips to a CMP roadway intersection or more than 150 trips to a CMP freeway segment. Therefore, further analysis of this issue will be provided in the EIR.

**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?**

**Less Than Significant Impact.** The Project proposes a new building with a maximum height of 179 feet. Thus, proposed development would not be subject to FAA requirements that may apply to new buildings taller than 200 feet (e.g., completion of Form 7460-1 Notice of Proposed Construction or Alteration). In addition, the Project Site is not located within the vicinity of any private or public airport or planning boundary of any airport land use plan. The nearest airport is LAX located approximately 12 miles southwest of the Project Site. Impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

**d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

**No Impact.** The Project's design does not include hazardous design features. The roadways adjacent to the Project Site are part of the existing urban roadway network and contain no sharp curves or dangerous intersections due to design features. In addition, the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. Furthermore, the design and implementation of new driveways would comply with the City's applicable requirements, including emergency access requirements set forth by the LAFD. The Project design would also be reviewed by LADBS and the LAFD during the City's plan review process to ensure all applicable requirements are met. Moreover, the Project would not introduce incompatible uses such as farm equipment to the Project Site. Therefore, no impacts associated with hazardous design features or incompatible uses would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**e) Result in inadequate emergency access?**

**Less Than Significant Impact.** While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. In addition, appropriate construction traffic control measures (e.g. detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways. Further, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Since emergency access to the Project Site would remain unobstructed during construction of the Project, impacts related to emergency access would be less than significant.

Operation of the Project would generate traffic in the Project vicinity and would result in some modifications to site access. A main driveway would be provided along Violet Street within the southeastern corner of the Project Site. A loading driveway would be provided within the alley on the western side of the Project Site. However, the Project's driveways and internal circulation would be designed to incorporate all City Building Code, Fire Code, and LADOT requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. Therefore, the Project would not result in inadequate emergency access. Impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

**f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?**

**Potentially Significant Impact.** The Project Site is served by a variety of transit options including multiple bus routes (Metro Local Lines, 18, 60, and 62). The development of the Project

could also increase demand for alternative transportation modes in the vicinity of the Project Site. Therefore, further analysis of the potential for the Project to conflict with adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities will be provided in the EIR.

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## XVII. TRIBAL CULTURAL RESOURCES.

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

- |                                                                                                                                                                                                                                                                                                                                                                                                                          |                                     |                          |                          |                          |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|
| i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or                                                                                                                                                                                                                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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

- i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?**
- ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

**Potentially Significant Impact.** Approved by Governor Jerry Brown on September 25, 2014, AB 52 establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As noted above, the Project would require excavations up to 77 feet below grade. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will notify all applicable tribes, and the City will participate in any requested consultations for the Project. Further analysis of this topic will be provided in the EIR.

|                                                                                                                                                                                                                                   | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact  | No Impact                |
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| <b>XVIII. UTILITIES AND SERVICE SYSTEMS.</b> Would the project:                                                                                                                                                                   |                                      |                                                                |                                     |                          |
| a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?                                                                                                                               | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input type="checkbox"/> |
| b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?                            | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input type="checkbox"/> |
| c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?                                     | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?                                                                            | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input type="checkbox"/> |
| e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input type="checkbox"/> |
| f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?                                                                                                            | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

|                                                                                           | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact  | No Impact                |
|-------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|-------------------------------------|--------------------------|
| g. Comply with federal, state, and local statutes and regulations related to solid waste? | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

**Potentially Significant Impact.** The City of Los Angeles Department of Public Works provides wastewater collection and treatment services for the Project Site. As is the case under existing conditions, wastewater generated during operation of the Project would be collected and discharged into existing sewer mains and conveyed to the Hyperion Treatment Plant (HTP) in El Segundo. The Project would result in increased wastewater generation from the Project Site. Therefore, further analysis of this topic in the EIR will be provided.

**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?**

**Potentially Significant Impact.** The Project would result in increased wastewater generation and increased water demand. As such, the Project would result in increased use of water and wastewater infrastructure and facilities, possibly necessitating the construction of new facilities. Therefore, further analysis of this topic in an EIR will be provided.

**c) 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.** As discussed above in Response to Checklist Question IX.a., the Project would implement capture and reuse or biofiltration to reduce stormwater pollution on the Project Site in accordance with the City’s LID requirements. In addition, as discussed above in Response to Checklist Question IX.c, specific onsite improvements would include the installation of area drains, planter drains, and building roof drain downspouts throughout the Project Site and within the building to collect building, roof, and site runoff and direct stormwater through a series of storm drain pipes. This on-site stormwater treatment and conveyance system would accommodate the Project’s stormwater flows. Therefore, the Project would not require or result in the construction of new off-site storm water drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

**d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

**Potentially Significant Impact.** LADWP supplies water to the Project Site. Given the Project’s increase in the amount of developed floor area on the Project Site, the Project has the

potential to result in an increased demand for water provided by LADWP. Therefore, further analysis of this issue will be provided in the EIR.

**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?**

**Potentially Significant Impact.** See Response to Checklist Question XVIII.b, above.

**f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**

**Less Than Significant Impact.** While the Bureau of Sanitation generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County are categorized as either Class III or unclassified landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in unclassified landfills.<sup>88</sup> Ten Class III landfills and one unclassified landfill with solid waste facility permits are currently operating within the County.<sup>89</sup> In addition, there are two solid waste transformation facilities within Los Angeles County that convert, combust, or otherwise process solid waste for the purpose of energy recovery.

In 2017, the City of Los Angeles disposed of approximately 1.8 million tons of solid waste at the County's Class III landfills and approximately 17,405 tons at transformation facilities.<sup>90,91</sup> The 1.8 million tons of solid waste accounts for approximately 1.9 percent of the total remaining capacity (96.45 million tons) for the County's Class III landfills open to the City.<sup>92,93</sup>

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<sup>88</sup> Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

<sup>89</sup> County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2015 Annual Report, December 2016.

<sup>90</sup> These numbers represent waste disposal, not generation, and thus do not reflect the amount of solid waste that was diverted via source reduction and recycling programs within the City.

<sup>91</sup> County of Los Angeles, Department of Public Works, Solid Waste Information System, Detailed Solid Waste Disposal Activity Report By Jurisdictions by Los Angeles (Reporting Period: January 2017 to December 2017).

<sup>92</sup>  $(1.8 \text{ million tons} \div 96.45 \text{ million tons}) \times 100 = 1.9 \text{ percent}$ .

<sup>93</sup> County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2015 Annual Report, December 2016, Appendix E-2 Table 1.

The unclassified landfill serving the County is Azusa Land Reclamation. This facility currently has 57.56 million tons of remaining capacity and an average daily disposal rate of 846 tons per day.<sup>94</sup>

Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan (ColWMP) Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.<sup>95</sup> Based on the most recent 2015 ColWMP Annual Report, the remaining total disposal capacity for the County's Class III landfills is estimated at 114.37 million tons.<sup>96</sup>

Based on the 2015 ColWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2030 will not exceed the 2015 remaining permitted Class III landfill capacity of 114 million tons. The County therefore has disposal capacity beyond the Project's buildout year of 2022. Nonetheless, while there is no expected daily landfill capacity shortfall during the planning period, there are constraints that may limit the accessibility of Class III landfill capacity. These constraints include watershed boundaries, geographic barriers, weather, and natural disasters. Therefore, the Annual Report evaluated seven scenarios and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with six of the scenarios. Only the scenario involving utilization of permitted in-county disposal capacity only would result in a shortfall. The Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail. The City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.<sup>97</sup> The City of Los Angeles is currently diverting 76.4 percent of its waste from landfills.<sup>98</sup> The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.<sup>99</sup>

The following analysis quantifies the Project's construction and operation solid waste generation.

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<sup>94</sup> County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2015 Annual Report, December 2016.

<sup>95</sup> County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2015 Annual Report, December 2016.

<sup>96</sup> This total excludes the estimated remaining capacity at the Puente Hills Landfill, which closed on October 31, 2013.

<sup>97</sup> LA Sanitation, Recycling, [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?\\_adf.ctrl-state=cmjbeyjp\\_5&\\_afLoop=9079556922933727#!](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=cmjbeyjp_5&_afLoop=9079556922933727#!), accessed March 2, 2018.

<sup>98</sup> LA Sanitation, Recycling, [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?\\_adf.ctrl-state=cmjbeyjp\\_5&\\_afLoop=9079556922933727#!](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=cmjbeyjp_5&_afLoop=9079556922933727#!), accessed March 2, 2018.

<sup>99</sup> LA Sanitation, Solid Waste Integrated Resources Plan (SWIRP), [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?\\_adf.ctrl-state=cmjbeyjp\\_5&\\_afLoop=9080031128366218#!](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_adf.ctrl-state=cmjbeyjp_5&_afLoop=9080031128366218#!), accessed March 2, 2018.

## Construction

The Project Site is currently developed with seven buildings that comprise a total of approximately 63,530 square feet. Five existing buildings within the northern portion of the Project Site that comprise approximately 56,686 square feet would be retained. Pursuant to the requirements of Senate Bill 1374,<sup>100</sup> the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. As shown in Table B-3 on page B-55, after accounting for mandatory recycling, the Project would result in approximately 595 tons of construction and demolition waste. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 57.56 million tons, as well as the remaining 96.45 million tons of capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

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<sup>100</sup> Senate Bill 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.

**Table B-3  
Project Demolition and Construction Waste Generation**

| <b>Building</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Size</b> | <b>Generation Rate<br/>(lbs/sf)<sup>a</sup></b> | <b>Total<br/>(tons)<sup>b</sup></b> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|-------------------------------------------------|-------------------------------------|
| <b>Construction Waste<sup>c</sup></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |             |                                                 |                                     |
| Residential (347 du)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 302,604 sf  | 4.38                                            | 663                                 |
| Office                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 187,374 sf  | 3.89                                            | 364                                 |
| Retail/Restaurant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 21,858 sf   | 3.89                                            | 43                                  |
| Amenity/Artist Production                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 926 sf      | 3.89                                            | 2                                   |
| <i>Construction Waste Subtotal</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |             |                                                 | <b>1,072</b>                        |
| <b>Demolition Waste</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |             |                                                 |                                     |
| Live/Work Space Removed <sup>d</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 6,844 sf    | 155                                             | 530                                 |
| Open Sheds <sup>e</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 10,024 sf   | 155                                             | 777                                 |
| <i>Demolition Waste Subtotal</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |             |                                                 | <b>1,307</b>                        |
| <b>Total for Construction and Demolition Waste</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |             |                                                 | <b>2,379</b>                        |
| <b>Total After 75-Percent Recycling</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |             |                                                 | <b>595</b>                          |
| <p><i>du = dwelling unit</i><br/> <i>lb = pound</i><br/> <i>sf = square feet</i><br/> <sup>a</sup> U.S. Environmental Protection Agency, Report No. EPA530-98-010, <i>Characterization of Building-Related Construction and Demolition Debris in the United States</i>, June 1998, Table 3, Table 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.<br/> <sup>b</sup> Numbers have been rounded.<br/> <sup>c</sup> Includes only new floor area to be constructed. See 'Proposed New Development' column in Table A-1 of the Project Description for this Initial Study.<br/> <sup>d</sup> Estimate is based on the original building permits.<br/> <sup>e</sup> This size estimate is based on the building footprint and assumes that the two open sheds are fully enclosed. Under current conditions, one shed is partially enclosed on the sides with a partial roof and one shed is completely open. Therefore, the estimated amount of demolition waste generated by the open sheds is conservative.<br/> Source: Eyestone Environmental, 2018.</p> |             |                                                 |                                     |

## Operation

As shown in Table B-4 on page B-56, upon full buildout, the Project would generate approximately 1,389 tons of solid waste per year when accounting for the removal of the existing land uses. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with AB 341, which Likewise, the analysis does not include implementation of the City's Zero Waste LA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a

**Table B-4  
Estimated Project Solid Waste Generation**

| Building                                                        | Size       | Employee Generation Rate per sf <sup>a</sup> | Estimated No. of Employees | Solid Waste Generation Rate <sup>b</sup> | Total Generation (tons/year) <sup>c</sup> |
|-----------------------------------------------------------------|------------|----------------------------------------------|----------------------------|------------------------------------------|-------------------------------------------|
| <b>Existing</b>                                                 |            |                                              |                            |                                          |                                           |
| Retail <sup>d</sup>                                             | 20,684 sf  | 0.00271                                      | 56                         | 0.91 tons/emp/yr                         | 51                                        |
| Restaurant <sup>e</sup>                                         | 5,055 sf   | 0.00271                                      | 14                         | 2.98 tons/emp/yr                         | 42                                        |
| Office                                                          | 6,983 sf   | 0.00479                                      | 33                         | 0.37 tons/emp/yr                         | 12                                        |
| Live-Work                                                       | 10 du      | N/A                                          | N/A                        | 2.23/du/yr                               | 22                                        |
| Warehouse                                                       | 2,109 sf   | 0.00135                                      | 3                          | 2.72 tons/emp/yr                         | 8                                         |
| <b>Total Existing</b>                                           |            |                                              |                            |                                          | <b>135</b>                                |
| <b>Proposed<sup>f</sup></b>                                     |            |                                              |                            |                                          |                                           |
| Live-Work                                                       | 353 du     | N/A                                          | N/A                        | 2.23/du/yr                               | 787                                       |
| Office                                                          | 194,357 sf | 0.00479                                      | 931                        | 0.37 tons/emp/yr                         | 344                                       |
| Retail/Restaurant <sup>g</sup>                                  | 47,597 sf  | 0.00271                                      | 129                        | 2.98 tons/emp/yr <sup>h</sup>            | 384                                       |
| Warehouse                                                       | 2,109 sf   | 0.00135                                      | 3                          | 2.72 tons/emp/yr                         | 8                                         |
| Artist Production Amenity Space                                 | 926 sf     | 0.00479                                      | 4                          | 0.37 tons/emp/yr                         | 1                                         |
| <b>Total Proposed</b>                                           |            |                                              |                            |                                          | <b>1,524</b>                              |
| <b>Total Net Increase (Proposed minus Existing)<sup>i</sup></b> |            |                                              |                            |                                          | <b>1,389</b>                              |

du = dwelling unit

emp = employee

lb = pound

sf = square feet

<sup>a</sup> Employee Generation Rates from Los Angeles Unified School District Developer Fee Justification Study, March 2017, Table 14.

<sup>b</sup> Non-residential yearly solid waste generation factors are from City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002. Residential rates are from L.A. CEQA Thresholds Guide.

<sup>c</sup> Numbers have been rounded.

<sup>d</sup> Size of retail derived by subtracting 5,055 sf of recently converted restaurant space from the 25,739 sf of total existing retail/restaurant space shown on Table A-1 in the Project Description of this Initial Study.

<sup>e</sup> Conversion of retail and warehouse space, as approved by Los Angeles Department of Building and Safety Permit No. 16016-10000-14951 and Planning Case No. ZA-2017-1185-CUB, to allow for future restaurant use by an operator.

<sup>f</sup> Includes existing uses to be retained plus new construction.

<sup>g</sup> Includes the conversion of approximately 5,055 square feet of existing retail and warehouses uses to restaurant uses has been approved by the City (Los Angeles Department of Building and Safety Permit No. 16016-10000-14951 and Planning Case No. ZA-2017-1185-CUB), which allows for future restaurant use by an operator.

<sup>h</sup> Applies the higher generation rate for restaurant use in order to provide a conservative analysis.

<sup>i</sup> The solid waste generated by the existing uses is subtracted from the solid waste generated by the proposed and the existing to remain, which results the net increase of solid waste that would be generated on the Project Site after completion.

Source: Eyestone Environmental, 2018.

Citywide recycling rate of 90 percent by the year 2025.<sup>101</sup> The estimated annual net increase in solid waste requires California commercial enterprises and public entities that generate 4 cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Waste that would be generated by the Project represents approximately 0.05 percent of the City's annual solid waste disposal<sup>102</sup> and approximately 0.001 percent of the remaining capacity for the County's Class III landfills open to the City of Los Angeles.<sup>103</sup> The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of the County's Class III landfills.

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

#### **g) Comply with federal, state, and local statutes and regulations related to solid waste?**

**Less Than Significant Impact.** Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate 4 cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste<sup>104</sup> on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate 8 cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate 4 cubic yards of organic waste per week were required to arrange for organic waste recycling services.

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<sup>101</sup> The Zero Waste LA Franchise System would divide the City into 11 zones and designate a single trash hauler for each zone. Source: LA Sanitation, Final Program Environmental Impact Report for City Ordinance: City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling (SCH# 2013021052), March 2014.

<sup>102</sup>  $1,389 \text{ tons per year} / 2.71 \text{ million tons per year} = 0.05\%$

<sup>103</sup>  $1,389 \text{ tons per year} / 96.45 \text{ million tons} = 0.001\%$

<sup>104</sup> Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.<sup>105</sup> The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

| Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact |
|--------------------------------------|----------------------------------------------------------------|------------------------------------|-----------|
|--------------------------------------|----------------------------------------------------------------|------------------------------------|-----------|

#### **XIX. 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? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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)?                                                                                                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?                                                                                                                                                                                                                                                                                                              | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

<sup>105</sup> Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

**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?**

**Potentially Significant Impact.** As discussed above, the Project is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. No sensitive plant or animal community or special status species occur on the Project Site. However, the Project does have the potential to degrade the quality of the environment or affect important examples of prehistory. Therefore, further evaluation of this topic will be provided in the EIR.

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

**Potentially Significant Impact.** The potential for cumulative impacts occurs when the impacts of the Project are combined with impacts from related development projects and result in impacts that are greater than the impacts of the Project alone. Located within the vicinity of the Project Site are other current and reasonably foreseeable projects, the development of which, in conjunction with that of the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: aesthetics; air quality; cultural resources; greenhouse gas emissions; land use and planning; noise; public services (fire protection, police protection, schools, parks, and other public services); recreation; transportation/circulation; tribal cultural resources; and utilities (water, wastewater, and energy).

With respect to agricultural resources and mineral resources, the Project Site is located in an urbanized area, and would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. With respect to biological resources and hazardous materials, these resource areas are generally site-specific and would be evaluated within the context of each individual project. Regarding geology and hazards, the Project would not exacerbate existing environmental conditions. Furthermore, related projects would be required to comply with existing regulatory requirements and the City’s building permit review and approval process, which address these subjects. In addition, with regard to hydrology, while the Project would result in an incremental increase to peak flows on 7th Place during the 50-year storm events, the Project would not create runoff which would exceed the capacity of existing or planned drainage systems, as the expected total increase in runoff is 0.0236 cfs, and the Project would not substantially alter on-site drainage. In accordance with City requirements, the Project and related projects would be required to implement BMPs to manage stormwater runoff in accordance with LID guidelines. Furthermore, the City of Los Angeles Department of Public Works reviews projects on a case-by-case basis to ensure sufficient local and regional infrastructure is available to accommodate stormwater runoff. Therefore, the Project would not contribute to a cumulative impact on downstream infrastructure.

With regard to population and housing, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. As discussed in the analysis above, the estimated net population, employment, and housing generated by the Project would represent approximately 0.76 percent of the population growth, 1.42 percent of the employment growth, and 0.66 percent of the housing growth forecasted by SCAG for the City of Los Angeles Subregion between 2018 and 2022. Thus, these increases would be well within SCAG growth forecasts.

With regard to solid waste, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. As discussed above in Response to Checklist Question VIII.f, the estimated annual net increase in solid waste that would be generated by the Project represents approximately 0.05 percent of the City's annual solid waste disposal and approximately 0.001 percent of the remaining capacity for the County's Class III landfills open to the City of Los Angeles. As also previously discussed in Response to Checklist Question VIII.f, the demand for landfill capacity is continually evaluated by the County through preparation of the ColWMP annual reports. Each annual ColWMP report assesses future landfill disposal needs over a 15 year planning horizon. Based on the 2015 ColWMP Annual Report, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e., 2030), which is beyond the Project's buildout year (2022). The preparation of each annual ColWMP provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Furthermore, in future years, it is anticipated that the rate of declining landfill capacity would slow considering the City's goal to achieve zero waste by 2030.

Therefore, cumulative impacts with respect to these topics would be less than significant, and no mitigation measures are required. No further evaluation of these topics in an EIR is required.

**c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

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

## **Appendix A.2**

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### Notice of Preparation (NOP)



# **NOTICE OF PREPARATION** OF ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING

**May 25, 2018**

|                                |                                                                           |
|--------------------------------|---------------------------------------------------------------------------|
| <b>ENVIRONMENTAL CASE NO.:</b> | ENV-2017-438-EIR                                                          |
| <b>PROJECT NAME:</b>           | 2143 Violet Street                                                        |
| <b>PROJECT APPLICANT:</b>      | ONNI Capital, LLC                                                         |
| <b>PROJECT ADDRESS:</b>        | 2117–2147 E. Violet Street; 2118–2142 E. 7th Place, Los Angeles, CA 90021 |
| <b>COMMUNITY PLAN AREA:</b>    | Central City North                                                        |
| <b>COUNCIL DISTRICT:</b>       | 14—Jose Huizar                                                            |
| <b>PUBLIC COMMENT PERIOD:</b>  | May 25, 2018–June 25, 2018                                                |
| <b>SCOPING MEETING:</b>        | June 14, 2018, 5:00 P.M.–7:00 P.M. See below for additional information.  |

The City of Los Angeles (City) intends to prepare an Environmental Impact Report (EIR) for the proposed 2143 Violet Street Project (Project). In accordance with Section 15082 of the California Environmental Quality Act (CEQA) Guidelines, the City has prepared this Notice of Preparation to provide the public, nearby residents and property owners, responsible agencies, and other interested parties with information regarding the Project and its potential environmental effects. The EIR will be prepared by outside consultants under the supervision of the City of Los Angeles, Department of City Planning.

The City requests your written comments as to the scope and contents of the EIR, including mitigation measures or project alternatives to reduce potential environmental impacts from the Project. Comments must be submitted in writing according to directions below. If you represent a public agency, the City seeks written comments as to the scope and content of the environmental information in the EIR that are germane to your agency's statutory responsibilities in connection with the Project. Your agency may need to use the EIR prepared by the City when considering your permit or other approval for the Project.

A Public Scoping Meeting will be held to receive input as to what environmental topics the EIR should study. No decisions about the Project are made at the Public Scoping Meeting. Additional project details, meeting information, and instructions for public comment submittal are listed below.

## **PROJECT LOCATION AND EXISTING ON-SITE USES:**

The Project Site is located in the Arts District area within the Central City North Community Plan Area of the City of Los Angeles. The approximately 2.2-acre Project Site is specifically bounded by East 7th Place to the north, East Violet Street to the south, an alley to the west, and properties to the east used primarily for parking. Further to the east are railroad tracks and the Los Angeles River. The Project Site is currently developed with seven buildings, located on the northern half of the Project Site, that comprise approximately 63,530 square feet of floor area and range in height from one to three stories. These existing buildings are used for office, retail, warehouse, and live-work uses. The Project Site also includes two open sheds and surface parking areas generally located on the southern half of the Project Site.

## PROJECT DESCRIPTION:

The Project would develop 347 new live-work units, approximately 187,374 square feet of new office space, 21,858 square feet of new retail/restaurant floor area, and 926 square feet of artist production amenity space. These new uses would be located in a 15-story building with a maximum height of 179 feet. In addition, five existing buildings that comprise approximately 56,686 square feet would be retained with office, retail, restaurant, warehouse, and live-work units. The Project Site is currently improved with seven structures and two sheds. Of these, two buildings containing four live-work units, and two open sheds would be removed. Upon completion, up to 569,448 square feet of floor area would be located within the Project Site, including the existing floor area to remain, resulting in a maximum floor area ratio (FAR) of 6.0:1 within the Project. The Project would also provide approximately 828 vehicular parking spaces and 1,284 bicycle parking spaces within six subterranean parking levels.

The Project's existing and proposed floor area square footages are as follows:

**Summary of Existing and Proposed Floor Area<sup>a</sup>**

| Land Use                                     | Existing Development    | Proposed New Development  | Existing and Reconfigured Uses to Remain | Floor Area Upon Completion |
|----------------------------------------------|-------------------------|---------------------------|------------------------------------------|----------------------------|
| Live-Work (including storage, and amenities) | 28,699 sf<br>(10 units) | 302,604 sf<br>(347 units) | 21,855 sf<br>(6 units)                   | 324,459 sf<br>(353 units)  |
| Office                                       | 6,983 sf                | 187,374 sf                | 6,983 sf                                 | 194,357 sf                 |
| Retail/Restaurant                            | 25,739 sf               | 21,858 sf                 | 25,739 sf <sup>b</sup>                   | 47,597 sf                  |
| Warehouse                                    | 2,109 sf                | 0 sf                      | 2,109 sf                                 | 2,109 sf                   |
| Artist Production Amenity Space              | N/A                     | 926 sf                    | N/A                                      | 926 sf                     |
| <b>Total</b>                                 | <b>63,530 sf</b>        | <b>512,762 sf</b>         | <b>56,686 sf</b>                         | <b>569,448 sf</b>          |

*sf = square feet*

*du = dwelling units*

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

<sup>b</sup> Includes the conversion of approximately 5,055 square feet of existing retail and warehouses uses to restaurant uses has been approved by the City (Los Angeles Department of Building and Safety Permit No. 16016-10000-14951 and Planning Case No. ZA-2017-1185-CUB), which allows for future restaurant use by an operator. For purposes of providing a conservative evaluation of the Project, conversion of these uses is also accounted for in the Project.

Source: Eystone Environmental, 2018.

## REQUESTED ACTIONS:

1. General Plan Amendment to the Central City North Community Plan to change the land use designation from Heavy Industrial to Regional Center Commercial.
2. Vesting Zone and Height District Change from M3-1-RIO to C2-2-RIO.
3. Vesting Conditional Use Permit to permit floor area averaging and residential density transfer within a unified development.
4. Site Plan Review for a maximum of 347 net new live-work units and a maximum of 210,158 square feet of net new non-residential floor area.
5. Master Conditional Use Permit for the on-site sale of a full-line of alcoholic beverages within the Project's commercial areas.

6. An affordable housing development incentive under Government Code Section 65915(k) to permit zero-foot side yards in lieu of 16 feet otherwise required for the residential levels along the eastern property line.
7. Vesting Tentative Tract Map for the merger and re-subdivision of the Project Site into three lots and for residential and commercial condominiums and including Haul Route approval.
8. Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, and building permits.

#### **POTENTIAL ENVIRONMENTAL EFFECTS OF THE PROJECT:**

Based on an Initial Study, the Project could have potentially significant environmental impacts in the following topic areas, which will be addressed in the EIR: Aesthetics, Air Quality, Cultural Resources, Greenhouse Gas Emissions, Land Use and Planning, Noise, Public Services (Fire Protection, Police Protection, Schools, Parks, and Libraries), Recreation, Transportation/Traffic, Tribal Cultural Resources, and Utilities and Service Systems (Water Supply and Infrastructure and Wastewater Generation and Infrastructure).

**PUBLIC SCOPING MEETING:** A Public Scoping Meeting will be held in **an open house format** to share information regarding the Project and the environmental review process and to receive written public comments regarding the scope and content of the environmental analysis to be addressed in the EIR. City staff, environmental consultants, and project representatives will be available, but no formal presentation is scheduled. You may stop by at any time during the hours listed below to view materials, ask questions, and provide written comments. The City encourages all interested individuals and organizations to attend this meeting. Written comments may be submitted, but there will be no verbal comments or public testimony taken at the Public Scoping Meeting. No decisions about the Project will be made at the Public Scoping Meeting. A separate public hearing for Municipal Code entitlement requests will be scheduled after the completion of the EIR. The date, time, and location of the Public Scoping Meeting are as follows:

**Date:** June 14, 2018  
**Time:** 5:00 P.M.–7:00 P.M.  
**Location:** Los Angeles Cleantech Incubator (LACI)  
525 S. Hewitt Street Los Angeles, CA 90013  
Room 401 – Training Classroom

Free (validated) parking is available at Los Angeles Cleantech Incubator, accessible from Hewitt Street.

#### **FILE REVIEW AND COMMENTS:**

The environmental file is available for public review at the City of Los Angeles, Department of City Planning, 221 N. Figueroa Street, Suite 1350, Los Angeles, CA 90012, during office hours Monday–Friday, 9:00 A.M.–4:00 P.M. To review the file, please contact the Staff Planner listed below to schedule an appointment. A copy of this notice and the Initial Study prepared for the Project may be viewed with the environmental file or online at <http://planning.lacity.org> by clicking on the “Environmental Review” tab, then “Notice of Preparation & Public Scoping Meetings,” and then clicking on the document links below the Project title.

The City will consider all written comments regarding the potential environmental impacts of the Project and issues to be addressed in the EIR. If you wish to submit comments, please reference the Environmental Case No. above, and submit them in writing by **June 25, 2018, no later than 4:00 P.M.** Written comments will also be accepted at the Public Scoping Meeting described above. Please direct your comments to:

**Mail:** William Lamborn  
City of Los Angeles, Department of City Planning  
221 N. Figueroa Street, Suite 1350  
Los Angeles, CA 90012

**E-Mail:** [william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)

**ACCOMMODATIONS:** As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability. The Public Scoping Meeting facility and its parking are wheelchair accessible. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or services may be provided upon request. Other services, such as translation between English and other languages, may also be provided upon written request submitted a minimum of seven (7) working days in advance to: [per.planning@lacity.org](mailto:per.planning@lacity.org). Be sure to identify the language you need English to be translated into, and indicate if the request is for oral or written translation services. If translation of a written document is requested, please include the document to be translated as an attachment to your email.

VINCENT P. BERTONI, AICP  
Director of Planning

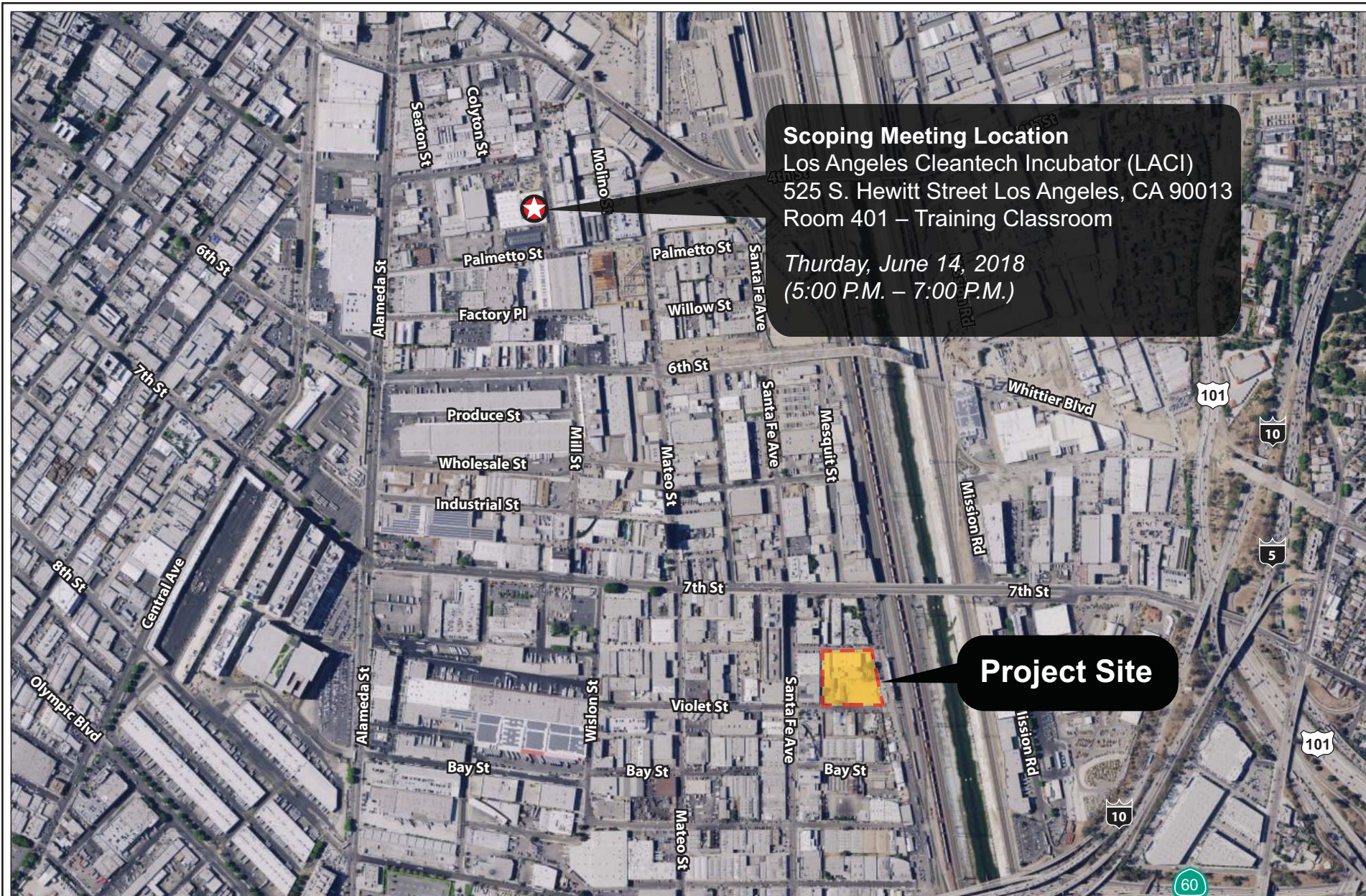


William Lamborn  
Major Projects Section  
Department of City Planning  
(213) 847-3637

**Attachments:**

Project Vicinity Map with Scoping Meeting Location  
Conceptual Site Plan

***Puede obtener información en Español acerca de esta junta llamando al (213) 847-3637.***



### Scoping Meeting Location

Los Angeles Cleantech Incubator (LACI)  
525 S. Hewitt Street Los Angeles, CA 90013  
Room 401 – Training Classroom

Thursday, June 14, 2018  
(5:00 P.M. – 7:00 P.M.)

**Project Site**

Project Vicinity Map with Scoping Meeting Location

E. 7TH PL.

ALLEY

PASEO

AMENITY

AMENITY

POOL

VIOLET STREET



Conceptual Site Plan

## **Appendix A.3**

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### NOP Comment Letters



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH



KEN ALEX  
DIRECTOR

Notice of Preparation

May 25, 2018

RECEIVED  
CITY OF LOS ANGELES

JUN 01 2018

MAJOR PROJECTS  
UNIT

To: Reviewing Agencies  
  
Re: 2143 Violet Street Project  
SCH# 2018051050

Attached for your review and comment is the Notice of Preparation (NOP) for the 2143 Violet Street Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**William Lamborn**  
**City of Los Angeles**  
**221 North Figueroa Street, suite 1350**  
**Los Angeles, CA 90012**

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Attachments  
cc: Lead Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2018051050  
**Project Title** 2143 Violet Street Project  
**Lead Agency** Los Angeles, City of

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**Type** NOP Notice of Preparation

**Description** Project would develop 347 new live-work units, 187,374 sq. ft. of new office space, 21,858 sq. ft. of new retail/restaurant floor area, and 926 sq. ft. of artist production amenity space. The new uses would be located in a 15-story building with a maximum height of 179 feet. Five existing buildings that comprise approx. 56,686 sq. ft. would be retained with office, retail, restaurant, warehouse, and live-work units. Two existing buildings containing 4 live work units, and 2 open sheds would be removed. Upon completion, up to 569,448 sq. ft. of floor area would be located within the project site, including the existing floor area to remain, resulting in a maximum FAR of 6.0:1. The project would also provide 828 vehicular parking spaces and 1,284 bicycle parking spaces within six subterranean parking levels.

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**Lead Agency Contact**

|                |                                       |                 |                  |
|----------------|---------------------------------------|-----------------|------------------|
| <b>Name</b>    | William Lamborn                       |                 |                  |
| <b>Agency</b>  | City of Los Angeles                   |                 |                  |
| <b>Phone</b>   | 213-847-3637                          | <b>Fax</b>      |                  |
| <b>email</b>   |                                       |                 |                  |
| <b>Address</b> | 221 North Figueroa Street, suite 1350 |                 |                  |
| <b>City</b>    | Los Angeles                           | <b>State</b> CA | <b>Zip</b> 90012 |

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**Project Location**

|                      |                                    |              |     |                |   |
|----------------------|------------------------------------|--------------|-----|----------------|---|
| <b>County</b>        | Los Angeles                        |              |     |                |   |
| <b>City</b>          | Los Angeles, City of               |              |     |                |   |
| <b>Region</b>        |                                    |              |     |                |   |
| <b>Cross Streets</b> | E. 7th Place, Violet Street        |              |     |                |   |
| <b>Lat / Long</b>    | 34° 01' 58.7" N / 118° 13' 43.2" W |              |     |                |   |
| <b>Parcel No.</b>    | 5166-003-006, -010 & 012           |              |     |                |   |
| <b>Township</b>      | 1S                                 | <b>Range</b> | 13W | <b>Section</b> | 9 |
|                      |                                    |              |     | <b>Base</b>    |   |

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**Proximity to:**

|                  |                                                               |
|------------------|---------------------------------------------------------------|
| <b>Highways</b>  | US 101, I-5, I-10, CA-60                                      |
| <b>Airports</b>  |                                                               |
| <b>Railways</b>  | BNSF, UP, Metro                                               |
| <b>Waterways</b> | LA River                                                      |
| <b>Schools</b>   | Various                                                       |
| <b>Land Use</b>  | Residential, Commercial & Warehouse/M3-1-RIO/Heavy Industrial |

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**Project Issues** Aesthetic/Visual; Air Quality; Archaeologic-Historic; Noise; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Traffic/Circulation; Water Supply; Landuse; Cumulative Effects; Other Issues

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**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; Office of Emergency Services, California; Department of Housing and Community Development; Native American Heritage Commission; Public Utilities Commission; State Lands Commission; California Highway Patrol; Caltrans, District 7; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 4; San Gabriel & Lower Los Angeles Rivers & Mountains Conservancy

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|                      |            |                        |            |                      |            |
|----------------------|------------|------------------------|------------|----------------------|------------|
| <b>Date Received</b> | 05/25/2018 | <b>Start of Review</b> | 05/25/2018 | <b>End of Review</b> | 06/25/2018 |
|----------------------|------------|------------------------|------------|----------------------|------------|

Note: Blanks in data fields result from insufficient information provided by lead agency.

**Notice of Completion & Environmental Document Transmittal**

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613  
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

**2018051050****Project Title:** 2143 Violet Street ProjectLead Agency: City of Los AngelesContact Person: William LambornMailing Address: 221 North Figueroa Street, Suite 1350Phone: (213) 847-3637City: Los AngelesZip: 90012County: Los Angeles**Project Location:** County: Los AngelesCity/Nearest Community: Los AngelesCross Streets: E. 7th Place, Violet StreetZip Code: 90021Longitude/Latitude (degrees, minutes and seconds): 34 ° 01 ' 58.7 " N / 118 ° 13 ' 43.2 " W Total Acres: 2.2Assessor's Parcel No.: 5166-003-006, -010 & -012Section: 9Twp.: 1SRange: 13W

Base: \_\_\_\_\_

Within 2 Miles: State Hwy #: US-101, I-5, I-10, CA-60Waterways: Los Angeles River

Airports: \_\_\_\_\_

Railways: BNSF, UP, MetroSchools: Metropolitan HS, Ninth Street School, Central HS
St. Turibius School, Twentieth Street ES, Kipp La Prep, Theodore Roosevelt HS, Amino Jackie Robinson Charter MS, Thomas Jefferson HS, Oscar de la Hoya Animo Charter HS, Colburn School.
**Document Type:**CEQA: ☒ NOP☐ Draft EIRNEPA: ☐ NOIOther: ☐ Joint Document☐ Early Cons☐ Supplement/Subsequent EIR☐ EA☐ Final Document☐ Neg Dec

(Prior SCH No.) \_\_\_\_\_

☐ Draft EIS☐ Other: \_\_\_\_\_☐ Mit Neg Dec

Other: \_\_\_\_\_

Governor's Office of Planning &amp; Research

**Local Action Type:**☐ General Plan Update☐ Specific Plan☒ Rezone☐ Annexation☒ General Plan Amendment☐ Master Plan☐ Prezone☐ Redevelopment☐ General Plan Element☐ Planned Unit Development☒ Use Permit☐ Coastal Permit☐ Community Plan☒ Site Plan☒ Land Division (Subdivision, etc.)

Other: \_\_\_\_\_

**Development Type:**☒ Residential: Units 353 Acres \_\_\_\_\_☒ Office: Sq.ft. 194,357 Acres \_\_\_\_\_

Employees \_\_\_\_\_

☐ Transportation: Type \_\_\_\_\_☒ Commercial: Sq.ft. 47,597 Acres \_\_\_\_\_

Employees \_\_\_\_\_

☐ Mining: Mineral \_\_\_\_\_☐ Industrial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_

Employees \_\_\_\_\_

☐ Power: Type \_\_\_\_\_

MW \_\_\_\_\_

☐ Educational: \_\_\_\_\_☐ Waste Treatment: Type \_\_\_\_\_

MGD \_\_\_\_\_

☐ Recreational: \_\_\_\_\_☐ Hazardous Waste: Type \_\_\_\_\_☐ Water Facilities: Type \_\_\_\_\_

MGD \_\_\_\_\_

☒ Other: Warehouse: 2,109 sf; Artist Amenity Space: 926 sf**Project Issues Discussed in Document:**☒ Aesthetic/Visual☐ Fiscal☒ Recreation/Parks☐ Vegetation☐ Agricultural Land☐ Flood Plain/Flooding☒ Schools/Universities☐ Water Quality☒ Air Quality☐ Forest Land/Fire Hazard☒ Septic Systems☒ Water Supply/Groundwater☒ Archeological/Historical☐ Geologic/Seismic☒ Sewer Capacity☐ Wetland/Riparian☐ Biological Resources☐ Minerals☐ Soil Erosion/Compaction/Grading☐ Growth Inducement☐ Coastal Zone☒ Noise☐ Solid Waste☒ Land Use☐ Drainage/Absorption☐ Population/Housing Balance☐ Toxic/Hazardous☒ Cumulative Effects☐ Economic/Jobs☒ Public Services/Facilities☒ Traffic/Circulation☒ Other: GHG, Tribal Cultural Resources**Present Land Use/Zoning/General Plan Designation:**

Residential, Commercial &amp; Warehouse/M3-1-RIO/Heavy Industrial

**Project Description:** (please use a separate page if necessary)

The Project would develop 347 new live-work units, 187,374 square feet of new office space, 21,858 square feet of new retail/restaurant floor area, and 926 square feet of artist production amenity space. The new uses would be located in a 15-story building with a maximum height of 179 feet. Five existing buildings that comprise approximately 56,686 square feet would be retained with office, retail, restaurant, warehouse, and live-work units. Two existing buildings containing 4 live-work units, and 2 open sheds would be removed. Upon completion, up to 569,448 square feet of floor area would be located within the Project Site, including the existing floor area to remain, resulting in a maximum FAR of 6.0:1. The Project would also provide 828 vehicular parking spaces and 1,284 bicycle parking spaces within six subterranean parking levels.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

## Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".  
If you have already sent your document to the agency please denote that with an "S".

|                                                                         |                                                                              |
|-------------------------------------------------------------------------|------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> Air Resources Board                 | <input type="checkbox"/> Office of Historic Preservation                     |
| <input type="checkbox"/> Boating & Waterways, Department of             | <input type="checkbox"/> Office of Public School Construction                |
| <input type="checkbox"/> California Emergency Management Agency         | <input type="checkbox"/> Parks & Recreation, Department of                   |
| <input type="checkbox"/> California Highway Patrol                      | <input type="checkbox"/> Pesticide Regulation, Department of                 |
| <input type="checkbox"/> Caltrans District # <u>7</u>                   | <input type="checkbox"/> Public Utilities Commission                         |
| <input type="checkbox"/> Caltrans Division of Aeronautics               | <input type="checkbox"/> Regional WQCB # <u>4</u>                            |
| <input type="checkbox"/> Caltrans Planning                              | <input type="checkbox"/> Resources Agency                                    |
| <input type="checkbox"/> Central Valley Flood Protection Board          | <input type="checkbox"/> Resources Recycling and Recovery, Department of     |
| <input type="checkbox"/> Coachella Valley Mtns. Conservancy             | <input type="checkbox"/> S.F. Bay Conservation & Development Comm.           |
| <input type="checkbox"/> Coastal Commission                             | <input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy |
| <input type="checkbox"/> Colorado River Board                           | <input type="checkbox"/> San Joaquin River Conservancy                       |
| <input type="checkbox"/> Conservation, Department of                    | <input type="checkbox"/> Santa Monica Mtns. Conservancy                      |
| <input type="checkbox"/> Corrections, Department of                     | <input type="checkbox"/> State Lands Commission                              |
| <input type="checkbox"/> Delta Protection Commission                    | <input type="checkbox"/> SWRCB: Clean Water Grants                           |
| <input type="checkbox"/> Education, Department of                       | <input type="checkbox"/> SWRCB: Water Quality                                |
| <input type="checkbox"/> Energy Commission                              | <input type="checkbox"/> SWRCB: Water Rights                                 |
| <input type="checkbox"/> Fish & Game Region # <u>5</u>                  | <input type="checkbox"/> Tahoe Regional Planning Agency                      |
| <input type="checkbox"/> Food & Agriculture, Department of              | <input type="checkbox"/> Toxic Substances Control, Department of             |
| <input type="checkbox"/> Forestry and Fire Protection, Department of    | <input checked="" type="checkbox"/> Water Resources, Department of           |
| <input type="checkbox"/> General Services, Department of                |                                                                              |
| <input type="checkbox"/> Health Services, Department of                 | Other: _____                                                                 |
| <input checked="" type="checkbox"/> Housing & Community Development     | Other: _____                                                                 |
| <input checked="" type="checkbox"/> Native American Heritage Commission |                                                                              |

### Local Public Review Period (to be filled in by lead agency)

Starting Date May 25, 2018 Ending Date June 25, 2018

### Lead Agency (Complete if applicable):

Consulting Firm: Eyestone Environmental  
Address: 2121 Rosecrans Avenue, Suite 3355  
City/State/Zip: El Segundo, CA 90245  
Contact: Stephanie Eyestone-Jones  
Phone: (424) 207-5333

Applicant: ONNI Capital, LLC  
Address: 315 W. 9th Street, Suite 801  
City/State/Zip: Los Angeles, CA 90015  
Phone: (213) 279-2315

Signature of Lead Agency Representative: \_\_\_\_\_

Date: 5/21/18

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

# NOP Distribution List BH

County: Los Angeles

SCH# 2018051050

## Regional Water Quality Control Board (RWQCB)

- ☐ **RWQCB 1**  
Cathleen Hudson  
North Coast Region (1)
- ☐ **RWQCB 2**  
Environmental Document  
Coordinator  
San Francisco Bay Region (2)
- ☐ **RWQCB 3**  
Central Coast Region (3)
- ☒ **RWQCB 4**  
Teresa Rodgers  
Los Angeles Region (4)
- ☐ **RWQCB 5S**  
Central Valley Region (5)
- ☐ **RWQCB 5F**  
Central Valley Region (5)  
Fresno Branch Office
- ☐ **RWQCB 5R**  
Central Valley Region (5)  
Redding Branch Office
- ☐ **RWQCB 6**  
Lahontan Region (6)
- ☐ **RWQCB 6V**  
Lahontan Region (6)  
Victorville Branch Office
- ☐ **RWQCB 7**  
Colorado River Basin Region (7)
- ☐ **RWQCB 8**  
Santa Ana Region (8)
- ☐ **RWQCB 9**  
San Diego Region (9)

☐ Other \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

☒ San Gabriel & Lower LA  
Conservancy Rivers & Mount.  
Conservancy

Last Updated 5/22/18

- ☐ **Caltrans, District 9**  
Gayle Rosander
- ☐ **Caltrans, District 10**  
Tom Dumas
- ☐ **Caltrans, District 11**  
Jacob Armstrong
- ☐ **Caltrans, District 12**  
Maureen El Harake

## Cal EPA

### Air Resources Board

- ☐ **Airport & Freight**  
Jack Wursten

**Transportation Projects**  
Nesamani Kalandiyur

- ☐ **Industrial/Energy Projects**  
Mike Tollstrup

- ☐ **California Department of Resources, Recycling & Recovery**  
Kevin Taylor/Jeff Esquivel

- ☐ **State Water Resources Control Board**  
Regional Programs Unit  
Division of Financial Assistance

- ☐ **State Water Resources Control Board**  
Cindy Forbes – Asst Deputy  
Division of Drinking Water

- ☐ **State Water Resources Control Board**  
Div. Drinking Water # \_\_\_\_\_

- ☐ **State Water Resources Control Board**  
Student Intern, 401 Water Quality  
Certification Unit  
Division of Water Quality

- ☐ **State Water Resources Control Board**  
Phil Crader  
Division of Water Rights

- ☐ **Dept. of Toxic Substances Control Reg. # \_\_\_\_\_**  
CEQA Tracking Center

- ☐ **Department of Pesticide Regulation**  
CEQA Coordinator

- ☒ **Native American Heritage Comm.**  
Debbie Treadway
- ☒ **Public Utilities Commission**  
Supervisor
- ☐ **Santa Monica Bay Restoration**  
Guangyu Wang
- ☒ **State Lands Commission**  
Jennifer Deleong
- ☐ **Tahoe Regional Planning Agency (TRPA)**  
Cherry Jacques

## Cal State Transportation Agency CalSTA

- ☐ **Caltrans - Division of Aeronautics**  
Philip Crimmins

- ☐ **Caltrans – Planning HQ LD-IGR**  
Christian Bushong

- ☒ **California Highway Patrol**  
Suzann Ikeuchi  
Office of Special Projects

## Dept. of Transportation

- ☐ **Caltrans, District 1**  
Rex Jackman
- ☐ **Caltrans, District 2**  
Marcelino Gonzalez
- ☐ **Caltrans, District 3**  
Susan Zanchi - North
- ☐ **Caltrans, District 4**  
Patricia Maurice
- ☐ **Caltrans, District 5**  
Larry Newland
- ☐ **Caltrans, District 6**  
Michael Navarro
- ☒ **Caltrans, District 7**  
Dianna Watson
- ☐ **Caltrans, District 8**  
Mark Roberts

- ☐ **Fish & Wildlife Region 4**  
Julie Vance
- ☒ **Fish & Wildlife Region 5**  
Leslie Newton-Reed  
Habitat Conservation Program
- ☐ **Fish & Wildlife Region 6**  
Tiffany Ellis  
Habitat Conservation Program
- ☐ **Fish & Wildlife Region 6 I/M**  
Heidi Calvert  
Inyo/Mono, Habitat Conservation Program
- ☐ **Dept. of Fish & Wildlife M**  
William Paznokas  
Marine Region

## Other Departments

- ☐ **California Department of Education**  
Lesley Taylor
- ☒ **OES (Office of Emergency Services)**  
Monique Wilber
- ☐ **Food & Agriculture**  
Sandra Schubert  
Dept. of Food and Agriculture
- ☐ **Dept. of General Services**  
Cathy Buck  
Environmental Services Section
- ☒ **Housing & Comm. Dev.**  
CEQA Coordinator  
Housing Policy Division

## Independent Commissions, Boards

- ☐ **Delta Protection Commission**  
Erik Vink
- ☐ **Delta Stewardship Council**  
Anthony Navasero
- ☐ **California Energy Commission**  
Eric Knight

## Resources Agency

- ☒ **Resources Agency**  
Nadell Gayou

- ☐ **Dept. of Boating & Waterways**  
Denise Peterson

- ☐ **California Coastal Commission**  
Allyson Hitt

- ☐ **Colorado River Board**  
Elsa Contreras

- ☒ **Dept. of Conservation**  
Crina Chan

- ☒ **Cal Fire**  
Dan Foster

- ☐ **Central Valley Flood Protection Board**  
James Herota

- ☒ **Office of Historic Preservation**  
Ron Parsons

- ☒ **Dept of Parks & Recreation**  
Environmental Stewardship Section

- ☐ **S.F. Bay Conservation & Dev't. Comm.**  
Steve Goldbeck

**Dept. of Water Resources**  
Resources Agency  
Nadell Gayou

## Fish and Game

- ☐ **Depart. of Fish & Wildlife**  
Scott Flint  
Environmental Services Division
- ☐ **Fish & Wildlife Region 1**  
Curt Babcock
- ☐ **Fish & Wildlife Region 1E**  
Laurie Harnsberger
- ☐ **Fish & Wildlife Region 2**  
Jeff Drongesen
- ☐ **Fish & Wildlife Region 3**  
Craig Weightman



William Lamborn &lt;william.lamborn@lacity.org&gt;

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**SCAQMD Staff NOP Comments for 2143 Violet Street (ENV-2017-438-EIR)**

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Lijin Sun &lt;LSun@aqmd.gov&gt;

Tue, Jun 5, 2018 at 6:37 AM

To: "william.lamborn@lacity.org" &lt;william.lamborn@lacity.org&gt;

Dear Mr. Lamborn,

Attached are SCAQMD staff's comments on the Notice of Preparation of Environmental Impact Report for 2143 Violet Street (ENV-2017-438-EIR) (SCAQMD Control Number: [LAC180525-02](#)). The original, electronically signed letter will be forwarded to your attention by regular USPS mail. Please contact me if you have any questions regarding these comments.

Thank you,

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765

Direct: (909) 396-3308

Fax: (909) 396-3324

**LAC180525-02 NOP 2143 Violet Street.pdf**  
351K

SENT VIA USPS AND E-MAIL:

June 5, 2018

[william.lamborn@lacity.org](mailto:william.lamborn@lacity.org)

William Lamborn

City of Los Angeles, Department of City Planning

221 N. Figueroa Street, Suite 1350

Los Angeles, CA 90012

**Notice of Preparation of Environmental Impact Report for  
2143 Violet Street (ENV-2017-438-EIR)<sup>1</sup>**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send SCAQMD a copy of the EIR upon its completion. Note that copies of the EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the EIR directly to SCAQMD at the address shown in the letterhead. **In addition, please send with the EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files<sup>2</sup>. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

**Air Quality Analysis**

SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from SCAQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on SCAQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

SCAQMD has also developed both regional and localized significance thresholds. SCAQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to

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<sup>1</sup> The Lead Agency proposes to build, among other things, a total of 347 residential units on 2.2 acres.

<sup>2</sup> Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

SCAQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts. SCAQMD's CEQA regional pollutant emissions significance thresholds can be found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by SCAQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

#### Mobile Source Health Risk Assessment

Notwithstanding the court rulings, SCAQMD staff recognizes that the Lead Agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Because of SCAQMD staff's concern about the potential public health impacts of siting sensitive populations within close proximity of freeways or other sources of air pollution, SCAQMD staff recommends that, prior to approving the project, Lead Agencies consider the impacts of air pollutants on people who will live in a new project and provide mitigation where necessary.

When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse health risk impacts using its best efforts to find out and a good-faith effort at full disclosure in the CEQA document. Based on a review of the Project Vicinity Map in the Notice of Preparation, SCAQMD staff found that the Proposed Project will be located in a close proximity to a rail line. Because of this close proximity, residents at the Proposed Project would be exposed to toxic air emissions. SCAQMD staff recommends that the Lead Agency conduct a health risk assessment (HRA)<sup>3</sup> to disclose the potential health risks to the residents from the emissions coming from locomotives using the rail line<sup>4</sup>.

#### Guidance Regarding Residences Sited Near a High-Volume Freeway or Other Sources of Air Pollution

SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and the

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<sup>3</sup> South Coast Air Quality Management District. *Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

<sup>4</sup> SCAQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When SCAQMD acts as the Lead Agency, SCAQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, the SCAQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This Guidance Document provides suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. SCAQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. This Guidance Document is available on SCAQMD's website at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>. Additional guidance on siting incompatible land uses (such as placing homes near freeways or other polluting sources) can be found in the California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance<sup>5</sup> on strategies to reduce air pollution exposure near high-volume roadways can be found at: [https://www.arb.ca.gov/ch/rd\\_technical\\_advisory\\_final.PDF](https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF).

### **Mitigation Measures**

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

- Chapter 11 of SCAQMD's CEQA Air Quality Handbook
- SCAQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

As stated above, the Proposed Project is located in proximity to a rail line. Many strategies are available to reduce exposure, including, but are not limited to, building filtration systems with MERV13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Because of the potential adverse health risks involved with siting sensitive receptors near sources of air pollution, it is essential that any proposed strategy must be carefully evaluated before implementation.

In the event that enhanced filtration units are installed at the Proposed Project either as a mitigation measure or project design feature requirement, SCAQMD staff recommends that the Lead Agency consider the limitations of the enhanced filtration. For example, in a study that SCAQMD conducted to

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<sup>5</sup> In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

investigate filters<sup>6</sup>, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the residents. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. In addition, these filters have no ability to filter out any toxic gases from vehicle exhaust. . Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to DPM emissions.

If enhanced filtration units are installed at the Proposed Project, and to ensure that they are enforceable and effective throughout the lifetime of the Proposed Project, SCAQMD staff recommends that the Lead Agency provide additional details regarding the ongoing, regular maintenance of filters in the EIR. To facilitate a good faith effort at full disclosure and provide useful information to future residents who will live at the Proposed Project, the EIR should include the following information, at a minimum:

- Disclose the potential health impacts to prospective residents from living in a close proximity of a rail line and the reduced effectiveness of air filtration system when windows are open and/or when residents are outdoor (e.g., in the common usable open space areas);
- Identify the responsible implementing and enforcement agency such as the Lead Agency to ensure that enhanced filtration units are installed on-site at the Proposed Project before a permit of occupancy is issued;
- Identify the responsible implementing and enforcement agency such as the Lead Agency to ensure that enhanced filtration units are inspected regularly;
- Provide information to residents on where the MERV filters can be purchased;
- Disclose the potential increase in energy costs for running the HVAC system to prospective residents;
- Provide recommended schedules (e.g., once a year or every six months) for replacing the enhanced filtration units to prospective residents;
- Identify the responsible entity such as residents themselves, Homeowner's Association, or property management for ensuring enhanced filtration units are replaced on time, if appropriate and feasible (if residents should be responsible for the periodic and regular purchase and replacement of the enhanced filtration units, the Lead Agency should include this information in the disclosure form);
- Identify, provide, and disclose any ongoing cost sharing strategies, if any, for the purchase and replacement of the enhanced filtration units;
- Set City-wide or Project-specific criteria for assessing progress in installing and replacing the enhanced filtration units; and
- Develop a City-wide or Project-specific process for evaluating the effectiveness of the enhanced filtration units at the Proposed Project.

### **Alternatives**

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d),

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<sup>6</sup> This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by SCAQMD: <http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf>.

the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

**Permits**

In the event that the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a responsible agency for the Proposed Project. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

**Data Sources**

SCAQMD rules and relevant air quality reports and data are available by calling SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at SCAQMD's webpage at: <http://www.aqmd.gov>.

SCAQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated and any significant impacts are mitigated where feasible. If you have any questions regarding this letter, please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) or call me at (909) 396-3308.

Sincerely,



Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC180525-02

Control Number

**CITY OF LOS ANGELES**  
INTER-DEPARTMENTAL CORRESPONDENCE

**DATE:** June 18, 2018

**TO:** Vincent P. Bertoni, Director of Planning  
Department of City Planning

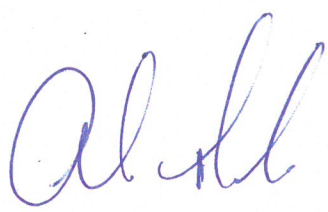
**Attn:** William Lamborn, City Planner  
Department of City Planning

**FROM:** Ali Poosti, Division Manager  
Wastewater Engineering Services Division  
LA Sanitation

**RECEIVED**  
CITY OF LOS ANGELES

**JUN 20 2018**

MAJOR PROJECTS  
UNIT



**SUBJECT: 2143 VIOLET STREET- NOTICE OF PREPARATION OF  
ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING**

This is in response to your May 25, 2018 letter requesting a review of the proposed mixed-use project between 2117-2147 E. Violet St. and 2118-2142 E. 7<sup>th</sup> Pl., Los Angeles, 90021. The project will consist of residential units, office, restaurant, and artist production amenity space. LA Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

**WASTEWATER REQUIREMENT**

LA Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvement projects needed to provide future capacity as the City grows and develops.

**Projected Wastewater Discharges for the Proposed Project:**

| Type Description                        | Average Daily Flow<br>per Type Description<br>(GPD/UNIT) | Proposed<br>No. of<br>Units | Average Daily Flow<br>(GPD) |
|-----------------------------------------|----------------------------------------------------------|-----------------------------|-----------------------------|
| <b><i>Proposed</i></b>                  |                                                          |                             |                             |
| Residential: Townhouse- 2 BDR           | 150 GPD/DU                                               | 13 DU                       | 1,950                       |
| Residential: APT- 1 BDR                 | 110 GPD/DU                                               | 147 DU                      | 16,170                      |
| Residential: APT- 1 BDR + DEN           | 150 GPD/DU                                               | 90 DU                       | 13,500                      |
| Residential: APT- 2 BDR                 | 150 GPD/DU                                               | 65 DU                       | 9,750                       |
| Residential: APT- 2 BDR + DEN           | 190 GPD/DU                                               | 19 DU                       | 3,610                       |
| Residential: APT- 3 BDR                 | 190 GPD/DU                                               | 13 DU                       | 2,470                       |
| Office Bldg W/Cooling Tower             | 170/1,000 Gr SF                                          | 187,374 SF                  | 31,854                      |
| Restaurant: Full Service Indoor<br>Seat | 30 GPD/SEAT                                              | 875 SEATS                   | 26,250                      |
| Artist production Amenity Space         | 120/1,000 Gr SF                                          | 926 SF                      | 112                         |
| Swimming Pool                           | POOL VOLUME                                              | 35,904<br>GALLONS           | 35,904                      |
| <b>Total</b>                            |                                                          |                             | <b>141,570 GPD</b>          |

## SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 8-inch line on 7<sup>th</sup> Pl. The sewage from the existing 8-inch line feeds into a 10-inch line on Santa Fe Ave and 60-inch line on Santa Fe Ave R/W before discharging into a 66-inch sewer line on Wilson St. Figure 1 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 8-inch line cannot be determined at this time without additional gauging.

The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

| Pipe Diameter (in) | Pipe Location      | Current Gauging d/D (%) | 50% Design Capacity |
|--------------------|--------------------|-------------------------|---------------------|
| 8                  | 7 <sup>th</sup> Pl | *                       | 229,323 GPD         |
| 8                  | 7 <sup>th</sup> Pl | *                       | 311,913 GPD         |
| 10                 | Santa Fe Ave       | *                       | 415,790 GPD         |
| 10                 | Santa Fe Ave       | *                       | 415,790 GPD         |
| 10                 | Santa Fe Ave       | *                       | 415,790 GPD         |
| 10                 | Santa Fe Ave       | *                       | 415,790 GPD         |
| 10                 | Santa Fe Ave       | *                       | 491,969 GPD         |
| 10                 | Santa Fe Ave       | *                       | 262,968 GPD         |
| 60                 | Santa Fe Ave R/W   | *                       | 31,258,900 GPD      |
| 66                 | Wilson St          | 45                      | 40,304,560 GPD      |

\* No gauging available

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the project.

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at [chris.demonbrun@lacity.org](mailto:chris.demonbrun@lacity.org).

## STORMWATER REQUIREMENTS

LA Sanitation, Watershed Protection Program (WPP) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

## POST-CONSTRUCTION MITIGATION REQUIREMENTS

In accordance with the Municipal Separate Storm Sewer (MS4) National Pollutant Discharge Elimination System (NPDES) Permit (Order No. R4-2012-0175, NPDES No. CAS004001) and the City of Los Angeles Stormwater and Urban Runoff Pollution Control requirements (Chapter VI,

Article 4.4, of the Los Angeles Municipal Code), the Project shall comply with all mandatory provisions to the Stormwater Pollution Control Measures for Development Planning (LID Ordinance) and as it may be subsequently amended or modified. Prior to issuance of grading or building permits, the Applicant shall submit a LID Plan to the City of Los Angeles, Bureau of Sanitation, Watershed Protection Division (WPD), for review and approval. The LID Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: [www.lacitysan.org](http://www.lacitysan.org). It is advised that input regarding LID requirements be received in the early phases of the project from WPD's plan-checking staff.

## GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the LID requirements. Green Street standard plans can be found at: [www.eng2.lacity.org/techdocs/stdplans/](http://www.eng2.lacity.org/techdocs/stdplans/)

## CONSTRUCTION REQUIREMENTS

All construction sites are required to implement a minimum set of BMPs for erosion control, sediment control, non-stormwater management, and waste management. In addition, construction sites with active grading permits are required to prepare and implement a Wet Weather Erosion Control Plan during the rainy season between October 1 and April 15. Additionally, construction sites that disturb more than one-acre of land are subject to the NPDES Construction General Permit issued by the State of California, and are required to prepare, submit, and implement the Storm Water Pollution Prevention Plan (SWPPP).

If there are questions regarding the stormwater requirements, please call WPP's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3rd Fl, Station 18.

## GROUNDWATER DEWATERING REUSE OPTIONS

The Los Angeles Department of Water and Power (LADWP) is charged with the task of supplying water and power to the residents and businesses in the City of Los Angeles. One of the sources of water includes groundwater. The majority of groundwater in the City of Los Angeles is adjudicated, and the rights of which are owned and managed by various parties. Extraction of groundwater within the City from any depth by law requires metering and regular reporting to the appropriate Court-appointed Watermaster. LADWP facilitates this reporting process, and may assess and collect

associated fees for the usage of the City's water rights. The party performing the dewatering should inform the property owners about the reporting requirement and associated usage fees.

On April 22, 2016 the City of Los Angeles Council passed Ordinance 184248 amending the City of Los Angeles Building Code, requiring developers to consider beneficial reuse of groundwater as a conservation measure and alternative to the common practice of discharging groundwater to the storm drain (SEC. 99.04.305.4). It reads as follows: "Where groundwater is being extracted and discharged, a system for onsite reuse of the groundwater, shall be developed and constructed. Alternatively, the groundwater may be discharged to the sewer."

Groundwater may be beneficially used as landscape irrigation, cooling tower make-up, and construction (dust control, concrete mixing, soil compaction, etc.). Different applications may require various levels of treatment ranging from chemical additives to filtration systems. When onsite reuse is not available the groundwater may be discharged to the sewer system. This allows the water to be potentially reused as recycled water once it has been treated at a water reclamation plant. If groundwater is discharged into the storm drain it offers no potential for reuse. The onsite beneficial reuse of groundwater can reduce or eliminate costs associated with sewer and storm drain permitting and monitoring. Opting for onsite reuse or discharge to the sewer system are the preferred methods for disposing of groundwater.

To help offset costs of water conservation and reuse systems, LADWP offers the Technical Assistance Program (TAP), which provides engineering and technical assistance for qualified projects. Financial incentives are also available. Currently, LADWP provides an incentive of \$1.75 for every 1,000 gallons of water saved during the first two years of a five-year conservation project. Conservation projects that last 10 years are eligible to receive the incentive during the first four years. Other water conservation assistance programs may be available from Metropolitan Water District of Southern California. To learn more about available water conservation assistance programs, please contact LADWP Rebate Programs 1-888-376-3314 and LADWP TAP 1-800-544-4498, selection "3".

For more information related to beneficial reuse of groundwater, please contact Greg Reed, Manager of Water Rights and Groundwater Management, at (213)367-2117 or [greg.reed@ladwp.com](mailto:greg.reed@ladwp.com).

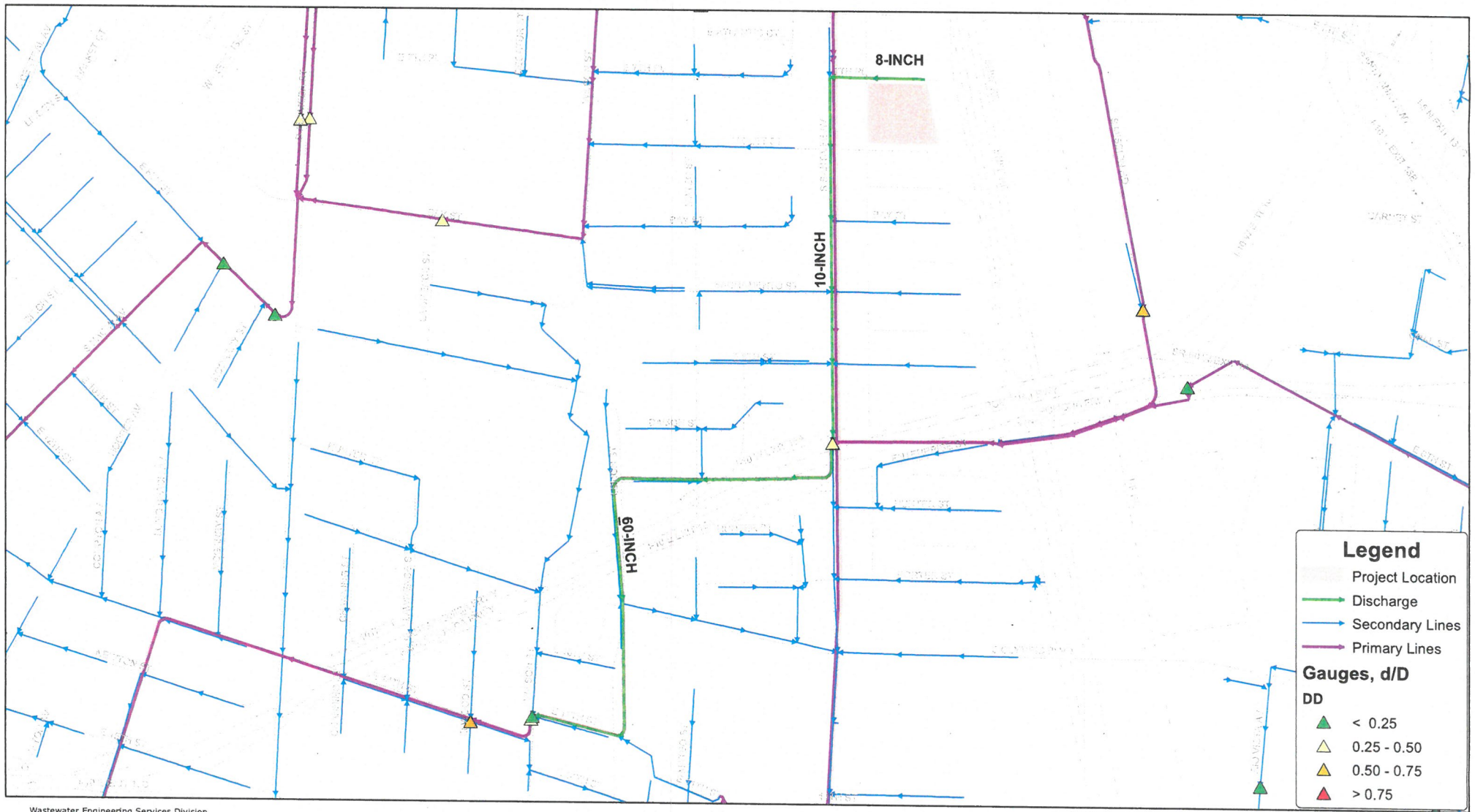
### **SOLID RESOURCE REQUIREMENTS**

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact LA Sanitation Solid Resources Recycling hotline 213-922-8300.

CD/AP: aj

Attachment: Figure 1 – Sewer Map

c: Kosta Kaporis, LASAN  
Christopher DeMonbrun, LASAN



Wastewater Engineering Services Division  
Bureau of Sanitation  
City of Los Angeles



**Figure 1**  
**2143 Violet Street**  
**Sewer Map**

Thomas Brother Data reproduced with permission granted by THOMAS BROS MAP



0 200 400 800 1,200 1,600  
Feet



William Lamborn &lt;william.lamborn@lacity.org&gt;

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## Comment Letter - 2143 Violet Street

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**Gonzalez, Brian** <Brian.Gonzalez@ladwp.com>

Fri, Jun 22, 2018 at 1:20 PM

To: "william.lamborn@lacity.org" &lt;william.lamborn@lacity.org&gt;

Good morning Will,

Hope all is well!

Thank you for the opportunity to review the NOP/IS for 2143 Violet Street. This email respectfully transmits LADWP's project comments.

Please do not hesitate to contact me if I can provide additional information or answer any questions.

Kind regards,

**BRIAN GONZALEZ****Los Angeles Department of Water and Power****Environmental Planning and Assessment**

111 N. Hope Street, Room 1044

Los Angeles, CA 90012

213.367.2612

[brian.gonzalez@ladwp.com](mailto:brian.gonzalez@ladwp.com)

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**2143 Violet Street Project.pdf**  
361K



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June 25, 2018

William Lamborn  
City of Los Angeles, Department of City Planning  
221 North Figueroa Street, Suite 1350  
Los Angeles, CA 90012

Dear Mr. Lamborn:

Subject: Comment Letter Regarding the Notice of Preparation of an Environmental Impact Report for the 2143 Violet Street Project

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to review the Initial Study (IS) prepared for the 2143 Violet Street Project. The mission of LADWP is to provide clean, reliable water and power to the City of Los Angeles. In reviewing the IS, the LADWP has determined that the project may have impacts to water resources and therefore, respectfully submits the comment below. You may receive additional comments from other divisions at LADWP separately referring to other respective areas.

#### **COMMENT**

Based on the Initial Study's Project Description, the estimated project water demand is greater than the amount required for a 500 dwelling unit project. Therefore, the proposed work meets the definition of "Project" per Water Code Section 10912 and is subject to the requirements of Water Code Section 10910-10915 for a water assessment.

For any questions regarding the above comment, please contact Mr. Brian Gonzalez of my staff at (213) 367-2612 or at [brian.gonzalez@ladwp.com](mailto:brian.gonzalez@ladwp.com).

Sincerely,

A handwritten signature in blue ink that reads 'Charles C. Holloway'.

Charles C. Holloway  
Manager of Environmental Planning and Assessment

BG:rs

c: Mr. Brian Gonzalez



William Lamborn &lt;william.lamborn@lacity.org&gt;

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**ENV-2017-438-EIR, 2143 E. Violet St**

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**Charlie Carnow** <ccarnow@unitehere11.org>

Mon, Jun 25, 2018 at 4:05 PM

To: William Lamborn &lt;william.lamborn@lacity.org&gt;

Dear Mr. Lamborn,

Attached is a comment letter on the Notice of Preparation for the Onni project at 2143 E. Violet St's EIR. Thank you very much for your stewardship of this process. Please add me to the interested parties list.

Great regards  
Charlie Carnow

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Charlie Carnow, Research Analyst  
UNITE HERE Local 11  
Phone: [\(818\) 635-3034](tel:8186353034)  
Email: [ccarnow@unitehere11.org](mailto:ccarnow@unitehere11.org)



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**onnivioletst.pdf**  
169K

# UNITEHERE! Local 11

464 Lucas Ave., Suite 201 • Los Angeles, California 90017 • (213) 481-8530 • FAX (213) 481-0352

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June 24, 2018

William Lamborn  
City of Los Angeles, Department of City Planning  
221 N. Figueroa St, Suite 1350  
Los Angeles, CA 90012

**RE: ENV-2017-438-EIR, 2143 E. Violet St**  
**Sent Via email**

Dear Mr. Lamborn,

On behalf of 30,000 hospitality and restaurant workers represented by UNITE HERE Local 11 in Los Angeles, Orange County, and Arizona, and on behalf of local residents Antonio Mendoza and Artemio Reyes (“Commenters”), we submit these comments with respect to the above-referenced project (“Project”) proposed by Onni Capital City LLC (“Applicant”). In addition to fulfilling integral roles in the local Los Angeles economy, many UNITE HERE Local 11 workers also live in the downtown/Little Tokyo/Arts District area. We wish to advocate for responsible development in the downtown area and to ensure that new projects do not negatively impact the existing communities. Accordingly we appreciate the opportunity to comment on the notice of preparation for the 2143 E. Violet St project, as detailed below.

## **Land Use**

With only eight percent of land within the City zoned for industrial use, conversions of industrial land for non-industrial uses (such as office and retail) can “diminish[] the availability of the City’s industrial lands along with the jobs, industries, and General Fund revenues they support” (see City Planning & CRA/LA Report, p. 11). The Project may therefore conflict with the City’s General Plan Framework Goal 3J of “[i]ndustrial growth” and Policy 3.14.6 that industrial-zoned land must not be reduced to “adversely impact the City’s ability to accommodate sufficient industrial uses” (see General Plan Framework, Chapter 3.16). The Project may also conflict with the applicable Community Plan Goal 3 of providing “sufficient land for a variety of industrial uses” and Community Plan Objectives 3-1 and 3-3 of “providing for existing and future industrial uses” and to “retain industrial plan designations” (see Community Plan, pp. III-8-9).<sup>17</sup> . The EIR should detail how the current project is consistent with these policies, how light industrial uses can continue to flourish under the development and co-exist with more commercial and residential uses, and consider ways the developer can contribute to the preservation of industrial uses in Downtown Los Angeles, by studying an alternative that preserves more industrial space and/or subsidizes industrial space elsewhere in Downtown LA.

Additionally, it is important that if housing is provided it is housing provided for long-term tenants. Onni should clarify if the project is intended as long-term rental housing for Los Angeles residents, so-called ‘corporate housing’, i.e furnished apartments for long-term business travelers, or short-term rentals. Conditions of approval should be placed on the housing units to ensure the leases are no shorter than a year to ensure it is indeed intended for long-term renters.

## **Hazardous Materials**

As a still largely industrial area, the EIR should address the past of the current site and establish the appropriate regulatory oversight over any prospective cleanup. The Phase 1 environmental assessment conducted for the site did not include any testing of the soil. The EIR should consider subjecting the site's cleanup to the oversight of the Department of Toxic Substances Control under a voluntary cleanup agreement and to provide the most transparency urge the developer to start the process prior to City Council's vote on the underlying land use entitlements so that the public can have the opportunity to see and comment on the cleanup plan prior to a vote.

## **Cultural Resources**

Per California Natural Resources Agency (2016). Tribal cultural resource assessments should be documented. Additionally a condition should be imposed requiring that excavation work be overseen by a qualified expert in Native American cultural resources similar to that adopted in the Final EIR for 520 Mateo St .<sup>1</sup>

## **Traffic / Air Quality / Greenhouse Gases**

CEQA requires all feasible mitigation measures be imposed. Accordingly, we ask that the Environmental Impact Report study an aggressive transportation demand management plan option which includes but is not limited to the following:

- Free transit passes for all office tenants and construction workers. Reduced price transit passes for all residential tenants and free transit passes for all residential tenants who do not buy parking and 50% off transit passes for residential tenants who do have a parking spot.
- Required unbundling of parking cost from office and residential tenants.
- Require all office employers to offer parking cash out
- Similar to the 520 Mateo St project<sup>2</sup>, Onni Capital City LLC shall commit \$200,000 to establish a Transportation Management Association for the Arts District and commit to paying a member rate for ten years at annual dues of \$50,000. The aim of the organization shall be to promote sustainable transportation options within the Arts District. The TMO services shall be available to anyone within the general Arts District community, not just residents and tenants of the Proposed Project. The Arts District community is a strong candidate for alternative modes of transportation, including walking and bicycling, carpooling and vanpooling, use of public transit, short-term automobile rentals, etc. At present, there is no organization to administrate and promote these options to the public. The Downtown/Arts District TMO would be

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<sup>1</sup> See 520 Mateo St, Final EIR, pages 15-18. <

<https://planning.lacity.org/eir/520Mateo/FEIR/FEIR%20Sections/FEIR%20520%20Mateo%20Project.pdf>>

<sup>2</sup> See 520 Mateo St, Final EIR, Mitigation Measure TR-MM-2. Page 115-116. <

<https://planning.lacity.org/eir/520Mateo/FEIR/FEIR%20Sections/FEIR%20520%20Mateo%20Project.pdf>>

an organization that helps to promote these services to the community by providing information about available . public transportation options and matching people into ridesharing services. Travel analyses in urban Los Angeles show that more than half of the trips within a specific urban zone have a trip length of less than five miles. Therefore, approximately 50 percent of trips in the Downtown/Arts District TMO area have the potential to be directly reduced by the TMO programs. The Downtown/Arts District TMO is expected to approach the levels of effectiveness of the Warner Center, Century City, and Burbank TMOs in that it will reduce the number of trips originating or ending within the Arts District TMO area. To this end, over the next two decades, it could reduce single-passenger automobile trips by as much as 15 percent while increasing transit ridership, use of ridesharing, and non-automotive modes of transportation such as walking and bicycling.

- In line with current practice at HD Buttercup, the development should include and be powered by solar panels.
- The developer should ensure the building is built to the LEED certified Gold Standard.

### **Statement of Overriding Consideration**

We are happy to see Measure JJJ working as it should in ensuring local hiring, prevailing wage, and other benefits for construction workers. We would also like to see information regarding other economic impacts and a discussion of what other community benefits could be provided as part of this development. For example, could we ensure targeted hiring provisions for the restaurant that would ensure local residents from Boyle Heights? Will the developer partner with organizations like Chrysalis, Homeboy, or labor-management partnerships on a good targeted hiring program for residential building management, upkeep of the office buildings, the future retail, restaurant and residential space that gives people another shot at life? Would the developer be willing to set aside some of the office space for low-cost use by community nonprofits or expand the art production space?

Thank you very much for your consideration of these issues. I ask to be placed on the interested parties list and be informed of the release of the Draft EIR, city hearings and other matters related to the project.

Regards

Charlie Carnow  
Research Analyst, UNITE HERE Local 11  
464 Lucas Ave. #201  
Los Angeles, CA 90035