

EXHIBIT C-1

Negative Declaration

ENV-2014-1545-ND

CPC-2014-1544-ZC-ZAD

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NEGATIVE DECLARATION

LEAD CITY AGENCY

City of Los Angeles

COUNCIL DISTRICT

9

PROJECT TITLE

ENV-2014-1545-ND

CASE NO.

CPC-2014-1544-ZC-ZAD

PROJECT LOCATION

3335 South Figueroa Street, Los Angeles, CA 90007

PROJECT DESCRIPTION

The Proposed Project consists of an entitlement request for a zone change and a shared parking approval associated with parking requirements for the University Gateway development, which was previously approved in 2006 under case No. CPC-2006-744-GPA-ZC-HD-ZV-BL-SPR. The Proposed University Gateway Zone Change and Shared Parking Approval (the "Project") seeks to remove the off-site parking requirement and allow for shared parking between all on-site commercial and residential guest uses. The Applicant is therefore requesting the following entitlements: (1) Zone Change. Pursuant to LAMC 12.32.F, the Applicant seeks a Zone Change to modify site-specific "Q" Condition #4 (Ordinance 178,542), which requires provision of 440 off-site automobile parking spaces to serve the project. (2) Shared Parking Approval. Pursuant to LAMC 12.24.X.20, the Applicant seeks a Shared Parking Approval to permit the shared parking between all commercial uses (retail, office, and restaurant) and residential guest uses.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY

Wilson University Gateway, LLC C/O Steven C. Spiekerman
Wilson University Gateway, LLC
c/o Steven C. Spiekerman
121 East Wilson Street
Madison, Wisconsin 53703

FINDING:

The City Planning Department of the City of Los Angeles has Proposed that a negative declaration be adopted for this project. The Initial Study indicates that no significant impacts are apparent which might result from this project's implementation. This action is based on the project description above.

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

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING THIS FORM

MICHELLE SINGH

TITLE

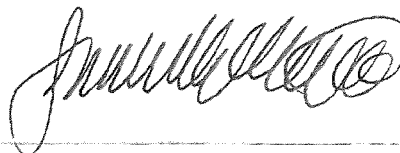
City Planner

TELEPHONE NUMBER

(213) 978-1166

ADDRESS

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

SIGNATURE (Official)**DATE**

11/07/14

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

LEAD CITY AGENCY: City of Los Angeles		COUNCIL DISTRICT: 9	DATE: 11/07/2014
RESPONSIBLE AGENCIES: Department of City Planning			
ENVIRONMENTAL CASE: ENV-2014-1545-ND		RELATED CASES: CPC-2014-1544-ZC-ZAD	
PREVIOUS ACTIONS CASE NO.:		<input type="checkbox"/> Does have significant changes from previous actions. <input checked="" type="checkbox"/> Does NOT have significant changes from previous actions.	
PROJECT DESCRIPTION: ZONE CHANGE TO MODIFY EXISTING Q CONDITION TO AN EXISTING MIXED-USE PROJECT.			
ENV PROJECT DESCRIPTION: The Proposed Project consists of an entitlement request for a zone change and a shared parking approval associated with parking requirements for the University Gateway development, which was previously approved in 2006 under case No. CPC-2006-744-GPA-ZC-HD-ZV-BL-SPR. The Proposed University Gateway Zone Change and Shared Parking Approval (the "Project") seeks to remove the off-site parking requirement and allow for shared parking between all on-site commercial and residential guest uses. The Applicant is therefore requesting the following entitlements: (1) Zone Change. Pursuant to LAMC 12.32.F, the Applicant seeks a Zone Change to modify site-specific "Q" Condition #4 (Ordinance 178,542), which requires provision of 440 off-site automobile parking spaces to serve the project. (2) Shared Parking Approval. Pursuant to LAMC 12.24.X.20, the Applicant seeks a Shared Parking Approval to permit the shared parking between all commercial uses (retail, office, and restaurant) and residential guest uses.			
ENVIRONMENTAL SETTINGS: The Project Site is located at 3335 S. Figueroa Street and is developed with the University Gateway mixed-use project as described above. Construction of the University Gateway development was completed in 2010 and now consists of 421 residential apartment units and approximately 74,516 square feet of ground-floor community-serving commercial land uses. A seven-level above grade parking garage provides 775 on-site automobile parking spaces. As per site specific "Q" Condition No. 5, and Variance Condition No. 6, a bicycle parking area on the ground floor of the parking structure provides 800 bicycle parking spaces. In addition University Gateway was required to provide 440 residential parking spaces off-site located at University Parking Center at 3401 S. Grand Avenue.			
PROJECT LOCATION: 3335 South Figueroa Street, Los Angeles, CA 90007			
COMMUNITY PLAN AREA: SOUTH LOS ANGELES STATUS: <input checked="" type="checkbox"/> Does Conform to Plan <input type="checkbox"/> Does NOT Conform to Plan		AREA PLANNING COMMISSION: SOUTH LOS ANGELES	CERTIFIED NEIGHBORHOOD COUNCIL: EMPOWERMENT CONGRESS NORTH AREA
EXISTING ZONING: [Q]C2-2D-O		MAX. DENSITY/INTENSITY ALLOWED BY ZONING: 3.6:1	
GENERAL PLAN LAND USE: Community Commercial		MAX. DENSITY/INTENSITY ALLOWED BY PLAN DESIGNATION: 3.6:1	
		LA River Adjacent: NO	

	PROPOSED PROJECT DENSITY: 3.6:1
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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.



City Planner

(213) 978-1166

Signature

Title

Phone

Evaluation Of Environmental Impacts:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources. A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance.

Environmental Factors Potentially Affected:

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

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

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

Background

PROPONENT NAME:

Wilson University Gateway, LLC C/O Steven C. Spiekerman

PHONE NUMBER:

(312) 324-6089

APPLICANT ADDRESS:

Wilson University Gateway, LLC
c/o Steven C. Spiekerman
121 East Wilson Street
Madison, Wisconsin 53703

AGENCY REQUIRING CHECKLIST:

Department of City Planning

DATE SUBMITTED:

09/23/2013

PROPOSAL NAME (if Applicable):

Potentially significant impact	Potentially significant unless mitigation incorporated	Less than significant impact	No impact
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I. AESTHETICS

a. Have a substantial adverse effect on a scenic vista?				✓
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				✓
c. Substantially degrade the existing visual character or quality of the site and its surroundings?				✓
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				✓

II. AGRICULTURE AND FOREST RESOURCES

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 nonagricultural use?				✓
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				✓
d. Result in the loss of forest land or conversion of forest land to non-forest use?				✓
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				✓

III. AIR QUALITY

a. Conflict with or obstruct implementation of the applicable air quality plan?				✓
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				✓
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the 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)?				✓
d. Expose sensitive receptors to substantial pollutant concentrations?				✓
e. Create objectionable odors affecting a substantial number of people?				✓

IV. BIOLOGICAL RESOURCES

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				✓
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				✓
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✓
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				✓
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✓
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				✓

V. CULTURAL RESOURCES

Potentially significant impact	Potentially significant unless mitigation incorporated	Less than significant impact	No Impact
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a.	Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?				✓
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?				✓
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				✓
d.	Disturb any human remains, including those interred outside of formal cemeteries?				✓

VI. GEOLOGY AND SOILS

a.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				✓
b.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?				✓
c.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?				✓
d.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?				✓
e.	Result in substantial soil erosion or the loss of topsoil?				✓
f.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				✓
g.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				✓
h.	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				✓

VII. GREEN HOUSE GAS EMISSIONS

a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				✓
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				✓

VIII. HAZARDS AND HAZARDOUS MATERIALS

a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				✓
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				✓
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✓
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				✓
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				✓
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				✓
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✓

Potentially significant impact	Potentially significant unless mitigation incorporated	Less than significant impact	No impact
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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?				✓
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IX. HYDROLOGY AND WATER QUALITY

a.	Violate any water quality standards or waste discharge requirements?				✓
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 preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				✓
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?				✓
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?				✓
e.	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				✓
f.	Otherwise substantially degrade water quality?				✓
g.	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?			✓	
h.	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?			✓	
i.	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			✓	
j.	Inundation by seiche, tsunami, or mudflow?			✓	

X. LAND USE AND PLANNING

a.	Physically divide an established community?				✓
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?				✓
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?				✓

XI. MINERAL RESOURCES

a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				✓
b.	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				✓

XII. NOISE

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?				✓
b.	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?				✓
c.	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				✓
d.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				✓

Potentially significant impact	Potentially significant unless mitigation incorporated	Less than significant impact	No impact
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e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				✓
f.	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				✓

XIII. POPULATION AND HOUSING

a.	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				✓
b.	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				✓
c.	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				✓

XIV. PUBLIC SERVICES

a.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Fire protection?				✓
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: Police protection?				✓
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 any of the public services: Schools?				✓
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 any of the public services: Parks?				✓
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 any of the public services: Other public facilities?				✓

XV. RECREATION

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

XVI. TRANSPORTATION/TRAFFIC

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?				✓
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Potentially significant impact	Potentially significant unless mitigation incorporated	Less than significant impact	No impact
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b.	Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?			✓	
c.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				✓
d.	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				✓
e.	Result in inadequate emergency access?				✓
f.	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				✓

XVII. UTILITIES AND SERVICE SYSTEMS

a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				✓
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				✓
c.	Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				✓
d.	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				✓
e.	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				✓
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				✓
g.	Comply with federal, state, and local statutes and regulations related to solid waste?				✓

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

a.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				✓
b.	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				✓
c.	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				✓

Note: Authority cited: Sections 21083, 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080, 21083.05, 21095, Pub. Resources Code; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

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

The Environmental Impact Assessment includes the use of official City of Los Angeles and other government source reference materials related to various environmental impact categories (e.g., Hydrology, Air Quality, Biology, Cultural Resources, etc.). The State of California, Department of Conservation, Division of Mines and Geology - Seismic Hazard Maps and reports, are used to identify potential future significant seismic events; including probable magnitudes, liquefaction, and landslide hazards. Based on applicant information provided in the Master Land Use Application and Environmental Assessment Form, impact evaluations were based on stated facts contained therein, including but not limited to, reference materials indicated above, field investigation of the project site, and any other reliable reference materials known at the time.

Project specific impacts were evaluated based on all relevant facts indicated in the Environmental Assessment Form and expressed through the applicant's project description and supportive materials. Both the Initial Study Checklist and Checklist Explanations, in conjunction with the City of Los Angeles's Adopted Thresholds Guide and CEQA Guidelines, were used to reach reasonable conclusions on environmental impacts as mandated under the California Environmental Quality Act (CEQA).

The project as identified in the project description will not cause potentially significant impacts on the environment. Therefore, this environmental analysis concludes that a Negative Declaration shall be issued for the environmental case file known as **ENV-2014-1545-N** **ENV-2014-1545-ND** and the associated case(s), **CPC-2014-1544-ZC-ZAD**.

ADDITIONAL INFORMATION:

All supporting documents and references are contained in the Environmental Case File referenced above and may be viewed in the EIR Unit, Room 763, City Hall.

For City information, addresses and phone numbers: visit the City's website at <http://www.lacity.org> ; City Planning - and Zoning Information Mapping Automated System (ZIMAS) cityplanning.lacity.org/ or EIR Unit, City Hall, 200 N Spring Street, Room 763.

Seismic Hazard Maps - <http://gmw.consrv.ca.gov/shmp/>

Engineering/Infrastructure/Topographic Maps/Parcel Information - <http://boemaps.eng.ci.la.ca.us/index01.htm> or City's main website under the heading "Navigate LA".

PREPARED BY:	TITLE:	TELEPHONE NO.:	DATE:
MICHELLE SINGH	City Planner	(213) 978-1166	11/07/2014

Impact?	Explanation	Mitigation Measures
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APPENDIX A: ENVIRONMENTAL IMPACTS EXPLANATION TABLE

I. AESTHETICS

a.	NO IMPACT	A significant impact to aesthetic resources could occur if the project were to include the construction of a new building or structure. The Project requests the reduction of parking spaces for the University Gateway Site. The Project eliminates the need for off-site parking. As such, no construction or any new structures are proposed. No impact would occur from the approval of the Proposed Project.	
b.	NO IMPACT	A significant impact to aesthetic resources could occur if the project were to include the construction of a new building or structure. The Project requests the reduction of parking spaces for the University Gateway Site. The Project eliminates the need for off-site parking. As such, no construction or any new structures are proposed. No impact would occur from the approval of the Proposed Project.	
c.	NO IMPACT	A significant impact to aesthetic resources could occur if the project were to include the construction of a new building or structure. The Project requests the reduction of parking spaces for the University Gateway Site. The Project eliminates the need for off-site parking. As such, no construction or any new structures are proposed. No impact would occur from the approval of the Proposed Project.	
d.	NO IMPACT	A significant impact may occur if the Proposed Project would create a new source or increase substantial light or glare which would adversely affect day or nighttime views. The current parking facility on the University Gateway Site is underutilized and has the capacity to absorb the 19 peak hour vehicles reported on the off-site parking lot and still retain surplus parking on-site of approximately 163 parking spaces. As such, no construction or any new structures are proposed, and the current parking facility on-site would not increase or cause new sources of glare or lighting on the University Gateway Site.	

II. AGRICULTURE AND FOREST RESOURCES

Impact?	Explanation	Mitigation Measures
a. NO IMPACT	A significant impact may occur if a project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use or in the rezoning of forest land or timberland. The University Gateway Site is located within a highly urbanized area within the City of Los Angeles and is not zoned for Agricultural uses. As such, no impact to agricultural lands or forestlands would occur of the implementation of the Proposed Project.	
b. NO IMPACT	A significant impact may occur if a project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use or in the rezoning of forest land or timberland. The University Gateway Site is located within a highly urbanized area within the City of Los Angeles and is not zoned for Agricultural uses. As such, no impact to agricultural lands or forestlands would occur of the implementation of the Proposed Project.	
c. NO IMPACT	A significant impact may occur if a project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use or in the rezoning of forest land or timberland. The University Gateway Site is located within a highly urbanized area within the City of Los Angeles and is not zoned for Agricultural uses. As such, no impact to agricultural lands or forestlands would occur of the implementation of the Proposed Project.	
d. NO IMPACT	A significant impact may occur if a project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use or in the rezoning of forest land or timberland. The University Gateway Site is located within a highly urbanized area within the City of Los Angeles and is not zoned for Agricultural uses. As such, no impact to agricultural lands or forestlands would occur of the implementation of the Proposed Project.	
e. NO IMPACT	A significant impact may occur if a project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use or in the rezoning of forest land or timberland. The University Gateway Site is located within a highly urbanized area within the City of Los	

Impact?	Explanation	Mitigation Measures
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		Angeles and is not zoned for Agricultural uses. As such, no impact to agricultural lands or forestlands would occur of the implementation of the Proposed Project.	
III. AIR QUALITY			
a.	NO IMPACT	<p>A significant impact may occur if the project is inconsistent with the applicable Air Quality Management Plan (AQMP) or would result in some way a substantial hindrance to employing the policies or obtaining the goals of that plan. A significant impact may also occur if the project violates any air quality standards that would result in an increase of any criteria pollutant that may expose sensitive receptors to substantial pollutant concentrations or objectionable odors. As previously discussed, the Proposed Project requests the reduction of parking associated with the University Gateway Site and would eliminate the requirement to lease 440 off-site parking spots. The Gibson Transportation Consulting, Inc.'s August 14, 2014 Shared Parking Analysis report (the "Gibson Report") finds that the on-site parking facility has the ability to absorb the off-site parking demand and still retain surplus parking on-site of approximately 163 parking spaces. The Project would not increase the amount of vehicles associated with the Site, and the Project would not generate any new vehicle trips. Further, bicycle use is one of the most utilized modes of transportation for University Gateway, which has the effect of reducing vehicle trips and associated air quality and greenhouse gas emissions. Limiting parking and encouraging bicycle use is an encouraged planning strategy for improving air quality in the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The Project is compliant with the Bicycle Parking Ordinance. The Project would not contribute or create any significant air quality impacts or conflict with any AQMP or CMP policies.</p>	
b.	NO IMPACT	<p>A significant impact may occur if the project is inconsistent with the applicable Air Quality Management Plan (AQMP) or would result in some way a substantial hindrance to employing the policies or obtaining the goals of that plan. A significant impact may also occur if the project violates any air quality standards</p>	

Impact?	Explanation	Mitigation Measures
	<p>that would result in an increase of any criteria pollutant that may expose sensitive receptors to substantial pollutant concentrations or objectionable odors. As previously discussed, the Proposed Project requests the reduction of parking associated with the University Gateway Site and would eliminate the requirement to lease 440 off-site parking spots. The Gibson Transportation Consulting, Inc.'s August 14, 2014 Shared Parking Analysis report (the "Gibson Report") finds that the on-site parking facility has the ability to absorb the off-site parking demand and still retain surplus parking on-site of approximately 163 parking spaces. The Project would not increase the amount of vehicles associated with the Site, and the Project would not generate any new vehicle trips. Further, bicycle use is one of the most utilized modes of transportation for University Gateway, which has the effect of reducing vehicle trips and associated air quality and greenhouse gas emissions. Limiting parking and encouraging bicycle use is an encouraged planning strategy for improving air quality in the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The Project is compliant with the Bicycle Parking Ordinance. The Project would not contribute or create any significant air quality impacts or conflict with any AQMP or CMP policies.</p>	
c. NO IMPACT	<p>A significant impact may occur if the project is inconsistent with the applicable Air Quality Management Plan (AQMP) or would result in some way a substantial hindrance to employing the policies or obtaining the goals of that plan. A significant impact may also occur if the project violates any air quality standards that would result in an increase of any criteria pollutant that may expose sensitive receptors to substantial pollutant concentrations or objectionable odors. As previously discussed, the Proposed Project requests the reduction of parking associated with the University Gateway Site and would eliminate the requirement to lease 440 off-site parking spots. The Gibson Transportation Consulting, Inc.'s August 14, 2014 Shared Parking Analysis report (the "Gibson Report") finds that the on-site parking facility has the ability to absorb the off-site parking demand and</p>	

Impact?	Explanation	Mitigation Measures
	<p>still retain surplus parking on-site of approximately 163 parking spaces. The Project would not increase the amount of vehicles associated with the Site, and the Project would not generate any new vehicle trips. Further, bicycle use is one of the most utilized modes of transportation for University Gateway, which has the effect of reducing vehicle trips and associated air quality and greenhouse gas emissions. Limiting parking and encouraging bicycle use is an encouraged planning strategy for improving air quality in the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The Project is compliant with the Bicycle Parking Ordinance. The Project would not contribute or create any significant air quality impacts or conflict with any AQMP or CMP policies.</p>	
d. NO IMPACT	<p>A significant impact may occur if the project is inconsistent with the applicable Air Quality Management Plan (AQMP) or would result in some way a substantial hindrance to employing the policies or obtaining the goals of that plan. A significant impact may also occur if the project violates any air quality standards that would result in an increase of any criteria pollutant that may expose sensitive receptors to substantial pollutant concentrations or objectionable odors. As previously discussed, the Proposed Project requests the reduction of parking associated with the University Gateway Site and would eliminate the requirement to lease 440 off-site parking spots. The Gibson Transportation Consulting, Inc.'s August 14, 2014 Shared Parking Analysis report (the "Gibson Report") finds that the on-site parking facility has the ability to absorb the off-site parking demand and still retain surplus parking on-site of approximately 163 parking spaces. The Project would not increase the amount of vehicles associated with the Site, and the Project would not generate any new vehicle trips. Further, bicycle use is one of the most utilized modes of transportation for University Gateway, which has the effect of reducing vehicle trips and associated air quality and greenhouse gas emissions. Limiting parking and encouraging bicycle use is an encouraged planning strategy for improving air quality in the 2012-2035</p>	

Impact?	Explanation	Mitigation Measures
	Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The Project is compliant with the Bicycle Parking Ordinance. The Project would not contribute or create any significant air quality impacts or conflict with any AQMP or CMP policies.	
e. NO IMPACT	<p>A significant impact may occur if the project is inconsistent with the applicable Air Quality Management Plan (AQMP) or would result in some way a substantial hindrance to employing the policies or obtaining the goals of that plan. A significant impact may also occur if the project violates any air quality standards that would result in an increase of any criteria pollutant that may expose sensitive receptors to substantial pollutant concentrations or objectionable odors. As previously discussed, the Proposed Project requests the reduction of parking associated with the University Gateway Site and would eliminate the requirement to lease 440 off-site parking spots. The Gibson Transportation Consulting, Inc.'s August 14, 2014 Shared Parking Analysis report (the "Gibson Report") finds that the on-site parking facility has the ability to absorb the off-site parking demand and still retain surplus parking on-site of approximately 163 parking spaces. The Project would not increase the amount of vehicles associated with the Site, and the Project would not generate any new vehicle trips. Further, bicycle use is one of the most utilized modes of transportation for University Gateway, which has the effect of reducing vehicle trips and associated air quality and greenhouse gas emissions. Limiting parking and encouraging bicycle use is an encouraged planning strategy for improving air quality in the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The Project is compliant with the Bicycle Parking Ordinance. The Project would not contribute or create any significant air quality impacts or conflict with any AQMP or CMP policies.</p>	
IV. BIOLOGICAL RESOURCES		

Impact?	Explanation	Mitigation Measures
a. NO IMPACT	<p>A significant impact may occur if a project were to result in a substantial adverse effect to any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service, or contribute to the loss of a sensitive habitat or wildlife corridor. The University Gateway Site is located within a highly urbanized area within the City of Los Angeles and is improved with a mixed-use project consisting of 421 dwelling units and approximately 74,516 square feet of commercial uses. No critical habitat or species are located in the vicinity of the Site. The Project does not include the construction of any new structures. As such, no impact to biological resources would occur of the implementation of the Project.</p>	
b. NO IMPACT	<p>A significant impact may occur if a project were to result in a substantial adverse effect to any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service, or contribute to the loss of a sensitive habitat or wildlife corridor. The University Gateway Site is located within a highly urbanized area within the City of Los Angeles and is improved with a mixed-use project consisting of 421 dwelling units and approximately 74,516 square feet of commercial uses. No critical habitat or species are located in the vicinity of the Site. The Project does not include the construction of any new structures. As such, no impact to biological resources would occur of the implementation of the Project.</p>	
c. NO IMPACT	<p>A significant impact may occur if a project were to result in a substantial adverse effect to any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service, or contribute to the loss of a sensitive habitat or wildlife corridor. The University Gateway Site is located within a highly urbanized area within the City of Los Angeles and is</p>	

Impact?	Explanation	Mitigation Measures
	improved with a mixed-use project consisting of 421 dwelling units and approximately 74,516 square feet of commercial uses. No critical habitat or species are located in the vicinity of the Site. The Project does not include the construction of any new structures. As such, no impact to biological resources would occur of the implementation of the Project.	
d. NO IMPACT	A significant impact may occur if a project were to result in a substantial adverse effect to any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service, or contribute to the loss of a sensitive habitat or wildlife corridor. The University Gateway Site is located within a highly urbanized area within the City of Los Angeles and is improved with a mixed-use project consisting of 421 dwelling units and approximately 74,516 square feet of commercial uses. No critical habitat or species are located in the vicinity of the Site. The Project does not include the construction of any new structures. As such, no impact to biological resources would occur of the implementation of the Project.	
e. NO IMPACT	A significant impact may occur if the project were to conflict with any local policies or ordinances protecting biological resources or provisions of an adopted conservation plan. The University Gateway Site is located within a highly urbanized area within the City of Los Angeles, and the Site is not a part of a conservation plan. The Project does not include the construction of any new structures. As such, no impact to biological resources would occur of the implementation of the Project.	
f. NO IMPACT	A significant impact may occur if the project were to conflict with any local policies or ordinances protecting biological resources or provisions of an adopted conservation plan. The University Gateway Site is located within a highly urbanized area within the City of Los Angeles, and the Site is not a part of a conservation plan. The Project does not include the construction of any new structures. As such, no impact to	

Impact?	Explanation	Mitigation Measures
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		biological resources would occur of the implementation of the Project.	
V. CULTURAL RESOURCES			
a.	NO IMPACT	The Proposed Project does not include the construction of a new building or structure that may adversely affect a significant cultural or historical resource. As such, no impact to cultural or historic resources would occur with the implementation of the Proposed Project.	
b.	NO IMPACT	The Proposed Project does not include the construction of a new building or structure that may adversely affect a significant cultural or historical resource. As such, no impact to cultural or historic resources would occur with the implementation of the Proposed Project.	
c.	NO IMPACT	The Proposed Project does not include the construction of a new building or structure that may adversely affect a significant cultural or historical resource. As such, no impact to cultural or historic resources would occur with the implementation of the Proposed Project.	
d.	NO IMPACT	The Proposed Project does not include the construction of a new building or structure that may adversely affect a significant cultural or historical resource. As such, no impact to cultural or historic resources would occur with the implementation of the Proposed Project.	
VI. GEOLOGY AND SOILS			
a.	NO IMPACT	A significant impact may occur if a project would place a new structure or building in an area that is susceptible to geological hazards or unstable soils. The Project does not include the construction of any new structures or buildings. As such, implementation of the Project would not contribute or create a significant impact to geology and soils.	
b.	NO IMPACT	A significant impact may occur if a project would place a new structure or building in an area that is susceptible to geological hazards or unstable soils. The Project does not include the construction of any new structures or buildings. As such, implementation of the Project would not contribute or create a significant impact to geology and soils.	

Impact?	Explanation	Mitigation Measures
NO IMPACT	A significant impact may occur if a project would place a new structure or building in an area that is susceptible to geological hazards or unstable soils. The Project does not include the construction of any new structures or buildings. As such, implementation of the Project would not contribute or create a significant impact to geology and soils.	
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NO IMPACT	A significant impact may occur if a project would place a new structure or building in an area that is susceptible to geological hazards or unstable soils. The Project does not include the construction of any new structures or buildings. As such, implementation of the Project would not contribute or create a significant impact to geology and soils.	

VII. GREEN HOUSE GAS EMISSIONS

Impact?	Explanation	Mitigation Measures
NO IMPACT	A significant impact may occur if the construction and operation of the Project has the potential to generate greenhouse gas emissions, either directly or indirectly, which may have a significant impact on the environment. As discussed in the Air Quality section above, the on-site parking structure has the capacity to absorb the off-site parking demand, and the Proposed Project would not increase the amount of vehicles associated with the Site and would not generate new vehicle trips. Additionally, the Proposed Project does not require the construction or operation of any new structures or facilities. As such, the Project would not contribute or create any new sources of greenhouse gas emissions.	
NO IMPACT	A significant impact may occur if the construction and operation of the Project has the potential to generate greenhouse gas emissions, either directly or indirectly, which may have a significant impact on the environment. As discussed in the Air Quality section above, the on-site parking structure has the capacity to absorb the off-site parking demand, and the Proposed Project would not increase the amount of vehicles associated with the Site and would not generate new vehicle trips. Additionally, the Proposed Project does not require the construction or operation of any new structures or facilities. As such, the Project would not contribute or create any new sources of greenhouse gas emissions.	
HAZARDS AND HAZARDOUS MATERIALS		
NO IMPACT	A significant impact may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Proposed Project does not include the construction of any new buildings or structures on-site and does not include any additional or new sources of hazardous materials that have not been previously accounted. Thus, no impact would occur.	
NO IMPACT	A significant impact may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive	

Impact?	Explanation	Mitigation Measures
	receptors. The Proposed Project does not include the construction of any new buildings or structures on-site and does not include any additional or new sources of hazardous materials that have not been previously accounted. Thus, no impact would occur.	
c. NO IMPACT	A significant impact may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Proposed Project does not include the construction of any new buildings or structures on-site and does not include any additional or new sources of hazardous materials that have not been previously accounted. Thus, no impact would occur.	
d. NO IMPACT	California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. The Proposed Project does not include the construction of any new buildings or structure that may cause unauthorized releases. Thus, no impact can occur from the implementation of the Proposed Project.	
e. NO IMPACT	The Proposed Project is not located in the vicinity of an airstrip. Additionally, the Project does not result in the addition of new residents on-site. Thus, no impact can occur.	
f. NO IMPACT	The Proposed Project is not located in the vicinity of an airstrip. Additionally, the Project does not result in the addition of new residents on-site. Thus, no impact can occur.	
g. NO IMPACT	A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. The Project will not involve new driveways or curb cuts to access the on-site parking facility. Thus, the Project	

Impact?	Explanation	Mitigation Measures
	will have no impact to local emergency response or emergency evacuation plans.	
h.	<p>NO IMPACT</p> <p>A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Site is not located in Mountain Fire District or Fire Buffer Zone. The Proposed Project does not result in the construction of new structures on-site or the addition of new residents. As such, the Proposed Project would not have the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires that have not been previously evaluated. Thus, no impact would occur.</p>	
IX. HYDROLOGY AND WATER QUALITY		
a.	<p>NO IMPACT</p> <p>A significant impact may occur if a project proposes a development project that would degrade local water quality, alter existing drainage patterns, or substantially deplete groundwater supply. The University Gateway Zone Change and Shared Parking Approval requests that parking for the already operational University Gateway Site be reduced to only on-site parking. The Project does not include the construction, alternation, or expansion of existing structures on-site. As such, the Project will not substantially degrade local water quality, alter existing drainage patterns, or substantially deplete groundwater supply. Thus, no impact will occur with the implementation of the Proposed Project.</p>	
b.	<p>NO IMPACT</p> <p>A significant impact may occur if a project proposes a development project that would degrade local water quality, alter existing drainage patterns, or substantially deplete groundwater supply. The University Gateway Zone Change and Shared Parking Approval requests that parking for the already operational University Gateway Site be reduced to only on-site parking. The Project does not include the construction, alternation, or expansion of existing structures on-site. As such, the Project will not substantially degrade local water quality, alter existing drainage patterns, or substantially deplete groundwater supply. Thus, no impact will occur with the implementation of the Proposed Project.</p>	

Impact?	Explanation	Mitigation Measures
NO IMPACT	A significant impact may occur if a project proposes a development project that would degrade local water quality, alter existing drainage patterns, or substantially deplete groundwater supply. The University Gateway Zone Change and Shared Parking Approval requests that parking for the already operational University Gateway Site be reduced to only on-site parking. The Project does not include the construction, alternation, or expansion of existing structures on-site. As such, the Project will not substantially degrade local water quality, alter existing drainage patterns, or substantially deplete groundwater supply. Thus, no impact will occur with the implementation of the Proposed Project.	
NO IMPACT	A significant impact may occur if a project proposes a development project that would degrade local water quality, alter existing drainage patterns, or substantially deplete groundwater supply. The University Gateway Zone Change and Shared Parking Approval requests that parking for the already operational University Gateway Site be reduced to only on-site parking. The Project does not include the construction, alternation, or expansion of existing structures on-site. As such, the Project will not substantially degrade local water quality, alter existing drainage patterns, or substantially deplete groundwater supply. Thus, no impact will occur with the implementation of the Proposed Project.	
NO IMPACT	A significant impact may occur if a project proposes a development project that would degrade local water quality, alter existing drainage patterns, or substantially deplete groundwater supply. The University Gateway Zone Change and Shared Parking Approval requests that parking for the already operational University Gateway Site be reduced to only on-site parking. The Project does not include the construction, alternation, or expansion of existing structures on-site. As such, the Project will not substantially degrade local water quality, alter existing drainage patterns, or substantially deplete groundwater supply. Thus, no impact will occur with the implementation of the Proposed Project.	

Impact?	Explanation	Mitigation Measures
NO IMPACT	A significant impact may occur if a project proposes a development project that would degrade local water quality, alter existing drainage patterns, or substantially deplete groundwater supply. The University Gateway Zone Change and Shared Parking Approval requests that parking for the already operational University Gateway Site be reduced to only on-site parking. The Project does not include the construction, alternation, or expansion of existing structures on-site. As such, the Project will not substantially degrade local water quality, alter existing drainage patterns, or substantially deplete groundwater supply. Thus, no impact will occur with the implementation of the Proposed Project.	
LESS THAN SIGNIFICANT IMPACT	A significant impact may occur if a project proposes a development project that would place housing within a 100-year flood plain or in an area susceptible to flooding due to levee or dam failure or inundation by seiche, tsunami, or mudflow. Pursuant to the City of Los Angeles General Plan Safety Element Exhibit C, the project site is located within a Potential Inundation Area, which could be flooded if a Flood Control Dam failed and released the water held in its detention basin upon the population and land uses downstream from it. The University Gateway Zone Change and Shared Parking Approval requests that parking for the already operational University Gateway Site be reduced to only on-site parking. The Project does not include the construction, alternation, or expansion of existing structures on-site. No new housing will be constructed as part of the requested action. Thus, the Project will not result in any housing being placed within a 100-year flood plain or in an area susceptible to flooding due to levee or dam failure or inundation by seiche, tsunami, or mudflow. Thus, impacts associated with flooding and inundation would be less than significant.	
LESS THAN SIGNIFICANT IMPACT	A significant impact may occur if a project proposes a development project that would place housing within a 100-year flood plain or in an area susceptible to flooding due to levee or dam failure or inundation by seiche, tsunami, or mudflow. Pursuant to the City of Los Angeles General Plan Safety Element	

Impact?	Explanation	Mitigation Measures
	<p>Exhibit C, the project site is located within a Potential Inundation Area, which could be flooded if a Flood Control Dam failed and released the water held in its detention basin upon the population and land uses downstream from it. The University Gateway Zone Change and Shared Parking Approval requests that parking for the already operational University Gateway Site be reduced to only on-site parking. The Project does not include the construction, alternation, or expansion of existing structures on-site. No new housing will be constructed as part of the requested action. Thus, the Project will not result in any housing being placed within a 100-year flood plain or in an area susceptible to flooding due to levee or dam failure or inundation by seiche, tsunami, or mudflow. Thus, impacts associated with flooding and inundation would be less than significant.</p>	
<p>i. LESS THAN SIGNIFICANT IMPACT</p>	<p>A significant impact may occur if a project proposes a development project that would place housing within a 100-year flood plain or in an area susceptible to flooding due to levee or dam failure or inundation by seiche, tsunami, or mudflow. Pursuant to the City of Los Angeles General Plan Safety Element Exhibit C, the project site is located within a Potential Inundation Area, which could be flooded if a Flood Control Dam failed and released the water held in its detention basin upon the population and land uses downstream from it. The University Gateway Zone Change and Shared Parking Approval requests that parking for the already operational University Gateway Site be reduced to only on-site parking. The Project does not include the construction, alternation, or expansion of existing structures on-site. No new housing will be constructed as part of the requested action. Thus, the Project will not result in any housing being placed within a 100-year flood plain or in an area susceptible to flooding due to levee or dam failure or inundation by seiche, tsunami, or mudflow. Thus, impacts associated with flooding and inundation would be less than significant.</p>	

Impact?	Explanation	Mitigation Measures
j. LESS THAN SIGNIFICANT IMPACT	<p>A significant impact may occur if a project proposes a development project that would place housing within a 100-year flood plain or in an area susceptible to flooding due to levee or dam failure or inundation by seiche, tsunami, or mudflow. Pursuant to the City of Los Angeles General Plan Safety Element Exhibit C, the project site is located within a Potential Inundation Area, which could be flooded if a Flood Control Dam failed and released the water held in its detention basin upon the population and land uses downstream from it. The University Gateway Zone Change and Shared Parking Approval requests that parking for the already operational University Gateway Site be reduced to only on-site parking. The Project does not include the construction, alternation, or expansion of existing structures on-site. No new housing will be constructed as part of the requested action. Thus, the Project will not result in any housing being placed within a 100-year flood plain or in an area susceptible to flooding due to levee or dam failure or inundation by seiche, tsunami, or mudflow. Thus, impacts associated with flooding and inundation would be less than significant.</p>	
X. LAND USE AND PLANNING		
a. NO IMPACT	<p>The Proposed Project does not include any new construction that may physically divide an established community. Thus, no impact will occur.</p>	
b. NO IMPACT	<p>A significant impact may occur if a project is inconsistent with the General Plan, the Urban Design guidelines, or zoning designations currently applicable to the Project Site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. The Site is currently zoned [Q]C2-2D-O. The "Q" Condition requires that University Gateway provide 440 automobile parking spaces at an off-site location for student residents. The Applicant is requesting a zone change (pursuant to LAMC 12.32.F) to remove the site-specific "Q" Condition (Ordinance 178,542) that requires 440 off-site parking spaces and is also requesting a shared parking approval from LAMC Section 12.24.X20 to permit the shared parking between all commercial uses (retail, office, and restaurant) and residential</p>	

Impact?	Explanation	Mitigation Measures
	guest uses. Of the total 775 on-site parking spaces, 421 parking spaces (levels 4 through 7) will be reserved for the residential uses and 354 parking spaces (levels 1 through 3) will be shared between all commercial uses as well as residential guest uses.	
c. NO IMPACT	As discussed in Question IV(f) above, no habitat conservation plans or natural community conservation plans presently exist which govern any portion of the Site. The Site is located in an area that has been previously disturbed and graded. Therefore, the Proposed Project would not have the potential to conflict with any applicable habitat conservation plan or natural community conservation plan. No impact would occur.	
XI. MINERAL RESOURCES		
a. NO IMPACT	The University Gateway Site is zoned [Q]C2-2D-O. The O designation indicates that the University Gateway Site is located within an oil drill zone, but the Proposed Project does not include the construction of any new structures on-site. Thus, the Project would not promote the loss of availability of a known mineral resource. No impact to mineral resources would occur with implementation of the Proposed Project.	
b. NO IMPACT	The University Gateway Site is zoned [Q]C2-2D-O. The O designation indicates that the University Gateway Site is located within an oil drill zone, but the Proposed Project does not include the construction of any new structures on-site. Thus, the Project would not promote the loss of availability of a known mineral resource. No impact to mineral resources would occur with implementation of the Proposed Project.	
XII. NOISE		
a. NO IMPACT	The University Gateway building has 775 on-site parking spaces for residential and commercial uses. The parking spaces are currently underutilized. The addition of the 19 peak hour vehicles that currently park off-site will not exceed the capacity of the parking structure on-site. Thus, the addition of these off-site vehicles will not exposure persons to excessive noise levels or increase vibrations to a significant level. Additionally, the Project does not require the construction, expansion, or any other modification to	

Impact?	Explanation	Mitigation Measures
	the current Site. Thus, no temporary or periodic increase in ambient noise will occur in the Project vicinity due to the modification in parking. Therefore, no impact associated with project operational noise levels will occur.	
b. NO IMPACT	The University Gateway building has 775 on-site parking spaces for residential and commercial uses. The parking spaces are currently underutilized. The addition of the 19 peak hour vehicles that currently park off-site will not exceed the capacity of the parking structure on-site. Thus, the addition of these off-site vehicles will not exposure persons to excessive noise levels or increase vibrations to a significant level. Additionally, the Project does not require the construction, expansion, or any other modification to the current Site. Thus, no temporary or periodic increase in ambient noise will occur in the Project vicinity due to the modification in parking. Therefore, no impact associated with project operational noise levels will occur.	
c. NO IMPACT	The University Gateway building has 775 on-site parking spaces for residential and commercial uses. The parking spaces are currently underutilized. The addition of the 19 peak hour vehicles that currently park off-site will not exceed the capacity of the parking structure on-site. Thus, the addition of these off-site vehicles will not exposure persons to excessive noise levels or increase vibrations to a significant level. Additionally, the Project does not require the construction, expansion, or any other modification to the current Site. Thus, no temporary or periodic increase in ambient noise will occur in the Project vicinity due to the modification in parking. Therefore, no impact associated with project operational noise levels will occur.	
d. NO IMPACT	The University Gateway building has 775 on-site parking spaces for residential and commercial uses. The parking spaces are currently underutilized. The addition of the 19 peak hour vehicles that currently park off-site will not exceed the capacity of the parking structure on-site. Thus, the addition of these off-site vehicles will not exposure persons to excessive noise levels or increase vibrations to a significant level. Additionally, the Project does not require the construction,	

Impact?	Explanation	Mitigation Measures
	expansion, or any other modification to the current Site. Thus, no temporary or periodic increase in ambient noise will occur in the Project vicinity due to the modification in parking. Therefore, no impact associated with project operational noise levels will occur.	
e. NO IMPACT	A significant impact may occur if the Proposed Project were located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or near the Project Site. The Project Site is not located within an airport land use plan. The nearest airport to the Site is the Los Angeles International (LAX) Airport, which is located approximately 8 miles to the southwest of the University Gateway Site. Therefore, no impact would occur and no further analysis of this issue is required.	
f. NO IMPACT	A significant impact may occur if the Project is within the vicinity of a private airstrip. The Project Site is not located in the vicinity of a private airstrip. Therefore, no impact would occur and no further analysis is required.	
XIII. POPULATION AND HOUSING		
a. NO IMPACT	The Proposed Project does not include the construction of any new structures or buildings on-site. There is no change to the number of dwelling units on-site or to the commercial square footage. Additionally, the Proposed Project would not displace any residents or hinder residents in any way. Thus, the Project will not contribute to population growth or displace existing housing.	
b. NO IMPACT	The Proposed Project does not include the construction of any new structures or buildings on-site. There is no change to the number of dwelling units on-site or to the commercial square footage. Additionally, the Proposed Project would not displace any residents or hinder residents in any way. Thus, the Project will not contribute to population growth or displace existing housing.	
c. NO IMPACT	The Proposed Project does not include the construction of any new structures or buildings on-site. There is no change to the number of dwelling units on-site or to the commercial square footage. Additionally, the Proposed Project would not displace any residents or hinder	

Impact?	Explanation	Mitigation Measures
	residents in any way. Thus, the Project will not contribute to population growth or displace existing housing.	
XIV. PUBLIC SERVICES		
a. NO IMPACT	A significant impact may occur of a project were to increase the number of residents beyond the capacity of public services or change the configuration of an existing site without a plan approval from the LAFD or LAPD. The Proposed Project does not include the construction of any new structures or buildings on-site. There is no change to the number of dwelling units on-site or to the commercial square footage that may result in the increase of public services. Additionally, the Proposed Project does not modify the current configuration or function of the Site. Thus, the Proposed Project will not create or contribute to a significant negative impact. No impact to public services will occur with the implementation of the Proposed Project.	
b. NO IMPACT	A significant impact may occur of a project were to increase the number of residents beyond the capacity of public services or change the configuration of an existing site without a plan approval from the LAFD or LAPD. The Proposed Project does not include the construction of any new structures or buildings on-site. There is no change to the number of dwelling units on-site or to the commercial square footage that may result in the increase of public services. Additionally, the Proposed Project does not modify the current configuration or function of the Site. Thus, the Proposed Project will not create or contribute to a significant negative impact. No impact to public services will occur with the implementation of the Proposed Project.	
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Impact?	Explanation	Mitigation Measures
	Site. Thus, the Proposed Project will not create or contribute to a significant negative impact. No impact to public services will occur with the implementation of the Proposed Project.	
d. NO IMPACT	A significant impact may occur of a project were to increase the number of residents beyond the capacity of public services or change the configuration of an existing site without a plan approval from the LAFD or LAPD. The Proposed Project does not include the construction of any new structures or buildings on-site. There is no change to the number of dwelling units on-site or to the commercial square footage that may result in the increase of public services. Additionally, the Proposed Project does not modify the current configuration or function of the Site. Thus, the Proposed Project will not create or contribute to a significant negative impact. No impact to public services will occur with the implementation of the Proposed Project.	
e. NO IMPACT	A significant impact may occur of a project were to increase the number of residents beyond the capacity of public services or change the configuration of an existing site without a plan approval from the LAFD or LAPD. The Proposed Project does not include the construction of any new structures or buildings on-site. There is no change to the number of dwelling units on-site or to the commercial square footage that may result in the increase of public services. Additionally, the Proposed Project does not modify the current configuration or function of the Site. Thus, the Proposed Project will not create or contribute to a significant negative impact. No impact to public services will occur with the implementation of the Proposed Project.	
XV. RECREATION		
a. NO IMPACT	A significant impact may occur of a project were to increase the number of residents beyond the capacity of local public recreational facilities. The Proposed Project does not include the construction of any new structures or buildings on-site. There is no change to the number of dwelling units on-site or to the commercial square footage that may result in the increase demand in public recreational facilities. Thus, the Proposed Project will not create or contribute to a	

Impact?	Explanation	Mitigation Measures
	significant negative impact to recreational facilities. No impact to recreational facilities will occur with the implementation of the Project.	
b. NO IMPACT	A significant impact may occur if a project were to increase the number of residents beyond the capacity of local public recreational facilities. The Proposed Project does not include the construction of any new structures or buildings on-site. There is no change to the number of dwelling units on-site or to the commercial square footage that may result in the increase demand in public recreational facilities. Thus, the Proposed Project will not create or contribute to a significant negative impact to recreational facilities. No impact to recreational facilities will occur with the implementation of the Project.	
XVI. TRANSPORTATION/TRAFFIC		
a. NO IMPACT	A significant impact may occur if the project were to conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit. Gibson Transportation Consulting, Inc. performed parking counts on October 2013 and a shared parking analysis of the University Gateway facilities on August 14, 2014. Gibson Transportation Consulting, Inc. determined that the highest reported on-site parking demand occurs in December with a typical weekday demand is 612 spaces, with weekend demand varying slightly at 592 spaces. The worst-case parking demands for off-site parking occurs in October with 19 vehicles, which also reflects the highest number of parked student vehicles during the count timeframe. The on-site parking garage offers 775 spaces for residents and commercial use. The Shared Parking Analysis Report determined that the current on-site parking structure has the ability to absorb this demand and still retain surplus parking on-site. When factoring in both on-site and off-site parking demand, the	

Impact?	Explanation	Mitigation Measures
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		on-site parking structure at University Gateway can easily accommodate the 19 vehicles reported at the peak period of off-site parking demand and still operate with an excess parking supply of 163 parking spaces.	
b.	LESS THAN SIGNIFICANT IMPACT	A significant impact may occur if the Project would increase the number of vehicles or vehicle trips associated with the University Gateway Site. The Project would relocate the existing vehicles that park off-site located at the University Parking Center (UPC) to on-site, which is anticipated to increase the demand and vehicles associated with on-site parking at University Gateway. However, as discussed above in Section XVI a., on-site parking has the capacity to absorb the off-site vehicles. Thus, the Project will not 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. Therefore, the Project would have a less-than-significant impact.	
c.	NO IMPACT	The Project does not contain any aviation-related uses, and the Project would not include the development of any aviation-related uses. Thus, the Project would have no impact on air traffic patterns.	
d.	NO IMPACT	The Project seeks a zone change a to remove a site-specific "Q" Condition (Ordinance 178,542), which requires provision of 440 automobile parking spaces at an off-site location for student residents, and a shared parking approval from LAMC Section 12.24.X.20 to permit the shared parking between all commercial uses (retail, office, and restaurant) and residential guest uses. Of the total 775 on-site parking spaces, 421 parking spaces (levels 4 through 7) will be reserved for the residential uses and 354 parking spaces (levels 1 through 3) will be shared between all commercial uses as well as residential guest uses. As discussed above the current parking facilities on-site have the capacity to absorb off-site parking demand. The Project is not proposing any construction or changes to the current parking facility on-site or any changes to the way the	

Impact?	Explanation	Mitigation Measures
	parking facility functions. Thus, the Project will not introduce any hazardous design features or incompatible uses. Thus, no impact will occur.	
e. NO IMPACT	A significant impact may occur if a project design does not provide emergency access meeting the requirements of the City of Los Angeles Fire Department or in any other way threatens the ability of emergency vehicles to access and serve the Site or adjacent uses. As discussed above, the Project does not proposed any incompatible uses or design features to the University Gateway Site. The relocation of off-site vehicles to on-site and the sharing of parking spaces will not exceed the capacity of the on-site parking facility. Therefore, the Project will not result in inadequate emergency access to the Project Site or vicinity.	
f. NO IMPACT	A significant impact may occur if a project would conflict with adopted transportation related policies. No construction or modifications to any alternative transportation facilities are proposed with this Project. If approved, the Proposed Project would be in conformance with the site-specific parking requirements for the development project. The requested zone change and shared parking approval would not conflict with any adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Thus, no impact would occur.	
XVII. UTILITIES AND SERVICE SYSTEMS		
a. NO IMPACT	A significant impact may occur of a project were to increase the number of residents or commercial space beyond the capacity of utility services. As previously discussed, the Proposed Project does not include the construction or expansion of any new structures or buildings on-site. There is no change to the number of dwelling units on-site or to the commercial square footage that may result in the increase demand of utility services. Thus, the Proposed Project will not create new demand for utilities, and no impact would occur.	

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b. NO IMPACT	A significant impact may occur of a project were to increase the number of residents or commercial space beyond the capacity of utility services. As previously discussed, the Proposed Project does not include the construction or expansion of any new structures or buildings on-site. There is no change to the number of dwelling units on-site or to the commercial square footage that may result in the increase demand of utility services. Thus, the Proposed Project will not create new demand for utilities, and no impact would occur.	
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d. NO IMPACT	A significant impact may occur of a project were to increase the number of residents or commercial space beyond the capacity of utility services. As previously discussed, the Proposed Project does not include the construction or expansion of any new structures or buildings on-site. There is no change to the number of dwelling units on-site or to the commercial square footage that may result in the increase demand of utility services. Thus, the Proposed Project will not create new demand for utilities, and no impact would occur.	
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I. MANDATORY FINDINGS OF SIGNIFICANCE		
NO IMPACT	A significant impact may occur if a project would degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. University Gateway is located in an urban setting, and the Proposed Project does not include the construction of any new structures or buildings. As discussed in Section IV Biological Resources and Section V Cultural Resources, the Proposed Project would not create or contribute to any significant impacts to biological or cultural resources. As such, the Project does not have the potential to degrade the environment or habitat, reduce or threaten fish or wildlife populations or animal communities, or eliminate important examples of the major period of California history or prehistory. No impact would occur.	

Impact?	Explanation	Mitigation Measures
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b.	NO IMPACT	A significant impact may occur if a project, in conjunction with other related projects in the area of the Project, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. As discussed in Sections I through XVII, the Proposed Project does not create or contribute to any significant impacts. As such, the Project does not contribute to any cumulatively considerable impacts.	
c.	NO IMPACT	A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. As identified in this Initial Study, the Proposed Project does not create any significant impacts that may cause substantial adverse effects on human beings, either directly or indirectly. As such, no impact will occur.	

RESPONSES TO COMMENTS

COMMENTS ON THE PROPOSED MITIGATED NEGATIVE DECLARATION

The City of Los Angeles, Department of City Planning, the lead agency under the authority of the California Environmental Quality Act (CEQA), received four comment letters that provided comments on the University Gateway project (herein referred to as the “the Project”) Negative Declaration (ND). Specifically, the comment letters received were submitted by Joyce Dillard, dated December 3, 2014; Laura Meyers, dated December 15, 2014; Jean Frost, dated December 15, 2014; and Jim Childs, dated December 15, 2014. The ND was circulated for public review on November 13, 2014 and the review comment period ended on December 3, 2014.

The State CEQA Guidelines requires the lead agency to consider comment letters submitted during the public review period of a Negative Declaration (CEQA Guidelines Section 15208) prior to adopting the proposed Negative Declaration and approving a project. While CEQA does not mandate that written responses be provided for Negative Declarations, the following responses are nonetheless provided to further confirm that the Negative Declaration is legally sufficient in meeting all requirements under CEQA and that no additional environmental analysis is required.

The decision as to whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency (CEQA Guidelines Section 15064). Pursuant to Section 15384 of the State CEQA Guidelines, substantial evidence is defined as:

“Substantial evidence” as used in these guidelines means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. Whether a fair argument can be made that the project may have a significant effect on the environment is to be determined by examining the whole record before the lead agency. Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.

(b) Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.

Further guidance with respect to determining whether a project may have one or more significant effects is provided in Sections 15064 (f) 4 and (f) 5, of the State CEQA Guidelines and are restated as follows:

(4) The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence before the agency that the project may have a significant effect on the environment.

(5) Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion support by facts.

In light of this guidance, and based on the responses to the comments as provided herein, no substantial evidence has been presented to support a fair argument that the Project may result in a significant environmental impact. To the contrary, the Negative Declaration has provided a good faith effort in identifying the reasonably foreseeable environmental impacts that the Project may cause, and has determined that since there are no physical changes to the existing building on-site and the worst-case peak demand for off-site parking can be accommodated on-site without significant environmental impacts, no mitigation measures are required and the Project would not produce any significant impacts.

Furthermore, it should be noted that recently (in 2013) the California Environmental Quality Act (CEQA) was amended to specifically address the modernization of transportation analysis in transit oriented infill development projects. Specifically, Section 21009(d)(1) of the Public Resources Code (P.R.C.) states that “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Since the University Gateway Project was approved and constructed the Exposition Light Rail station has opened within one-half mile (walking distance) of the University Gateway Project. Thus, due to the residential and mixed use nature of the Project, and its proximity to the Expo Light Rail line station, by law parking impacts can no longer be considered a significant environmental impact that would trigger the need to prepare an EIR. Thus, the Negative Declaration prepared for the Project is adequate for purposes of complying with CEQA and further analysis in the form of a Mitigated Negative Declaration (MND) or Environmental Impact Report (EIR) is not warranted.

Provided below are written comments on the ND to the lead agency during and after the designated review period from November 13, 2014 to December 3, 2014. A summary of the issues raised in the comment letters and responses as addressed are provided below.

COMMENT LETTER 1

Joyce Dillard
P.O. Box 31377
Los Angeles, California 90031
dillardjoyce@yahoo.com
December 3, 2014

COMMENT 1.1

The Project is within a METHANE ZONE with potential oil field gas emissions.

RESPONSE 1.1

The commenter is correct in that the Project is located within the City of Los Angeles Methane Zone. However, a significant impact would only occur if the implementation of the project could create a significant hazard to the public or the environment by upset or accidental conditions that would cause the release of hazardous materials. The Project consists of an entitlement request for a zone change and a shared parking approval associated with parking requirements for the University Gateway development. No physical construction activities will take place. Since the Project does not include the construction of any new structures or any physical modification to any existing structures on-site there is no potential for accidental upset of methane on-site. As such, no further response is warranted.

COMMENT 1.2

The CPC-2006-7446-GPA-ZC-HD-ZV-BL-SPR Determination Letter dated December 6, 2006 states:

Building subterranean parking also poses a problem, since the site is located in an identified methane gas zone. As noted in the FEIR and studies prepared for the project, including financial analysis, building underground parking would result in additional expensive mitigation measures, beyond those already undertaken, and would make the project cost-prohibitive.

Even while the off-site parking spaces are within walking distance, several mitigation measures have been volunteered by the applicant to minimize the potential impacts of the proposed parking scenario. They include:

- *Putting in place a parking management plan for the project which includes keeping vehicle information for all residents on file to monitor their parking and ensure that they are not parking in spaces designated for project visitors nor in the surrounding neighborhood;*
- *Entering into an agreement with USC to ensure the off-site spaces are reserved for the project residents in a designated area accessible only by them with key card access;*

- *Making improvements to the streetscape in the form of landscaping, lighting and the provision of security along the path to the UPC to make it more pleasant and safer for students to walk;*
- *Arrange with USC to ensure that the university tram incorporates the site in its route between campus and the UPC and give students access to the “after hours” door-to-door shuttle service; and*
- *Pricing the on-site residential parking spaces at a monthly rate that is higher than that of the UPC to make parking at the UPC a more attractive option.*

RESPONSE 1.2

The above comment restates several mitigation measures that were voluntarily imposed by the Applicant as stated in the December 2006 Decision Letter. These mitigation measures have all been complied with. As disclosed in the environmental analysis contained in the Negative Declaration, approval of the current request will not result in significant environmental impacts or increase the severity of any impacts previously disclosed in the EIR.

COMMENT 1.3

Ordinance 178,542 states:

4. Parking.

a. The applicant shall provide parking in compliance with Section 12.21 A 4 of the Municipal Code. A minimum of 770 parking spaces shall be provided on the subject site with a minimum of 349 on-site parking spaces being designated for the ground floor commercial uses and residential visitors and the remainder reserved for residential use. The number of spaces provided, their location and access shall be in substantial conformance with the site plan, marked Exhibit “B” and attached to the subject case file.

b. A portion of the required residential parking spaces, not to exceed 440 spaces, may be provided at the existing University Parking Structure (UPC) located at 3401 South Grand Avenue, a distance of 1,100 feet away from the subject property. A covenant and agreement reserving the off-site spaces in the UPC for the subject project shall be recorded on the site of the UPC at the County of Los Angeles Recorder’s Office and a copy shall be provided to the Department of City Planning prior to the issuance of any permits.

c. The 440 residential parking spaces that will be located off-site shall be reserved, dedicated and accessible only to project residents in an area set aside for such resident use within the existing USC parking structure with an additional internal gate access accessible only by keycard or other similar device. The spaces shall be reserved for this use for the life of the subject project.

This project warrants an Addendum to the Environmental Impact Report (SCH 2005051041) not a Negative Declaration as there would be impacts to the Environment.

RESPONSE 1.3

The proposed project seeks to amend Ordinance 178,542 as detailed in the entitlement application for CPC-2014-1544-ZC-ZAD and ENV-2014-1545-ND. The lead agency has prepared a detailed Negative Declaration in compliance with CEQA. It should be noted that the Negative Declaration was published and circulated for public review, whereas an Addendum need not be circulated for public review and comment. Thus, the decision to prepare a Negative Declaration is more inclusive and transparent than the process allowed under an Addendum. The preparation of either an Addendum or a Negative Declaration would satisfy CEQA. Thus, the lead agency has selected the most open and inclusionary form of review.

COMMENT LETTER 2

North University Park Community Association (N.U.P.C.A)

Attn: Laura Meyers

1818 S. Gramercy Place

Los Angeles, California 90019

323.737.8146

lauramink@aol.com

COMMENT 2.1

Applicant proposes that the new environmental clearance be a Negative Declaration, because there are no new environmental impacts anticipated. However, the proposed ND only evaluates this limited portion of Applicant's new multiple requests for entitlements and does not evaluate the new proposed variance that Applicant states it is seeking to reduce its overall parking requirements (e.g., completely eliminating the 440 spaces in the offsite structure.) Applicant in its submitted proposed "University Gateway Zone Change Findings" states specifically that it will seek "a new variance to authorize less-than-required residential parking on-site." The ND needs to evaluate the entire situation and not split the project, even if Applicant's path is itself split between several Planning Department (and possibly Successor CRA) sections.

RESPONSE 2.1

The commenter asserts that the Negative Declaration does not address the elimination of 440 parking spaces at an off-site location. However, the Negative Declaration does in fact address the impact of eliminating these parking spaces. As noted on page 1 of the Negative Declaration under the subheading

“Project Description,” the project is defined as seeking a request to “remove the of-site parking requirement and allow for shared parking between all on-site commercial and residential guest uses.” The Negative Declaration further references and incorporates the Shared Parking Analysis which specifically focuses on this request. As such the Negative Declaration has adequately analyzed the entirety of the project and has not split the analysis, as purposed by the commenter.

COMMENT 2.2

Having said that, it is clear to me that the new proposed environmental clearance for University Gateway fails to adequately evaluate the cumulative impacts, particularly as it relates to parking and traffic impacts, this project will have on the surrounding community, in particular the residential communities north and northwest of the subject site.

RESPONSE 2.2

The parking observations and Shared Parking Analysis are based on on-site observations of how the project is functioning. The 440 space off-site parking inventory is currently being provided but is substantially underutilized because of lack of demand. The project’s contribution to cumulative parking impacts is reflected in the project’s current utilization of on-site bicycle and vehicle parking. As demonstrated in the Shared Parking Analysis, the approval of the request would not alter the parking demand at the site, would still result in surplus parking supply on-site at peak demand times, and would not create an increase in demand for parking on or off-site. Thus, approval of the request would not impact the residential communities north and northwest of the subject site.

COMMENT LETTER 3

West Adams Heritage Association
Attn: Jean Frost
2341 Scarff Street
Los Angeles, California 90007
213.747.2526

COMMENT 3.1

The proposal before you cannot be reasonably granted because the required findings cannot be met. The original requirement for the Gateway development parking was substantively researched and the requirements for parking, unlike the current cursory study undertaken by Craig Lawson & Co., LLC, were based on numerous parking studies which evaluated the larger context in which Gateway was being developed. To allow less than the code required zoning, and less than that provided as mitigation in the

FEIR for the project, would set a dangerous precedent for development within University Park and make a mockery of the zoning code, as well as the mitigation provided by the FEIR. To grant this request will be materially detrimental to the public welfare and injurious to property or improvements in the same vicinity in which the property is located.

RESPONSE 3.1

As noted above, pursuant to SB 743, parking impacts for a residential or mixed-use project in a transit priority zone have been deemed to be less than significant impact pursuant to CEQA. As per the certified FEIR, June 2006, Section 4.9.2-10 did not include a mitigation measure associated with parking or requiring off-site parking. In addition, the Project will not involve new construction or authorize new land uses and the Shared Parking Analysis determined that the worst-case peak demand for off-site parking can be accommodated on-site while still maintaining surplus parking. Approval of the current request will not result in significant environmental impacts.

COMMENT 3.2

The EIR agreed that there would be a 55 year lease for the additional 440 parking spaces. How can this be accounted for if the request is granted?

RESPONSE 3.2

The proposed request to eliminate the requirement for off-site parking is based on the current lack of demand for parking spaces at an off-site facility. If the proposed request is granted, the private parking agreement may no longer be required and it would be up to the private parties to amend or terminate the parking agreement, as appropriate.

COMMENT 3.3

A mitigation offered in the DEIR was that the scenario of an active residential parking use “increases the appeal of the parking center” (DEIR 4.9.2-4). What is the negative impact if this 440 space parking – which was said to trigger enhancement – is now withdrawn?

RESPONSE 3.3

As noted in the proposed Negative Declaration, no negative impacts would occur with the removal of off-site parking because the off-site parking area is currently substantially underutilized.

COMMENT 3.4

A negative declaration cannot be sufficient in the context of the DEIR, FEIR and various agreements that were made to grant approval of this discretionary project.

Given the many issues raised during the implementation of the FEIR, the question arises how those narrow applications can be granted without a more substantive review. Just because a parking structure is currently underutilized does not mean that the current under-utilization will continue.

Granting a parking right that would be a precedential, one that is not enjoyed by any other developer, cannot be justified. Such granting would be materially detrimental by setting a standard that future developers would seek to utilize resulting in severely under-parked, out of scale development.

The Lawson study is conclusory and not based on accurate in depth analysis. The estimated parking need provided for Gateway in the FEIR was based on “an analysis was prepared using multiple estimation methodologies. Demand was based on census data, Institute of Transportation Engineers (ITE) parking generation data, practice at other Universities and city Code requirements.’¹

While the decreased parking may be adequate for usage in May and October of 2013, it does not consider the needs that may be incurred as usage and demographics change and as the local community may be using the commercial use of the demographics of the housing may change due to its proximity to downtown’s loft district or due to the development of 4500 student housing units at University Village.

RESPONSE 3.4

As mentioned above, since the time the original project was approved, CEQA has been amended to modernize transportation and parking analyses in transit oriented development areas. Pursuant to SB 743, parking impacts for residential or mixed-use projects in a transit priority zone shall be considered a less than significant impact pursuant to CEQA. In addition, the project will not involve new construction or authorize new land uses and the Shared Parking Analysis determined that the worst-case peak demand for off-site parking can be accommodated on-site while still maintaining surplus parking. Approval of the current request will not result in significant environmental impacts.

COMMENT LETTER 4

Adams Dockweiler Heritage Organizing Committee
Attn: Jim Childs, Chair
2326 Scarff Street
University Park, Los Angeles, California 90007
213.747.2526

¹ +University Gateway Project, Draft EIR, Vol.1, 4.9.2-4

COMMENT 4.1

This applicant is currently seeking additional special treatment from the City for a project that has already been granted far too many inappropriate entitlements. The original GATEWAY developers, Urban Partners, were approved not only for relief from complying with normal required residential parking demands, but permitted to have approximately one-third of that demand located not on site but about half-a-mile away across the I-100 Freeway.

That the new owners are currently asking for even more special privileges on a project that is based on prior City issued entitlements, which were defined and codified through the issuance of an EIR is outrageous. That the City would now find that the proposed requested grantings could have no environmental impacts so therefore only a Negative Declaration is needed to satisfy CEQA is an abuse of discretionary authority. Given the enormity of the request, eliminating 440 residential parking spaces, which is more than one-third of the approved City Code requirement, should have triggered a Supplemental EIR to review the potential negative impacts and allow for meaningful public comment.

RESPONSE 4.1

The commenter asserts that the adoption of the proposed Negative Declaration would be an abuse of discretionary authority. However, as mentioned above, pursuant to SB 743, parking impacts for residential or mixed-use projects in a transit priority zone shall be considered a less than significant impact pursuant to CEQA. In addition, the Shared Parking Analysis and Negative Declaration demonstrate that the current request to eliminate the off-site parking requirement will not result in new or substantially increased significant environmental impacts. Accordingly, a Supplemental EIR is not required pursuant to Public Resources Section 21166 and CEQA Guidelines Section 15162.

CONCLUSION

Based on the information provided above, the lead agency has complied with Sections 15070 to 15073 of the State CEQA Guidelines. In addition, and consistent with Section 15064 of the State CEQA Guidelines, the information presented above illustrates that the Appellant's have not introduced any substantial evidence to support a fair argument that the project may have a significant effect on the environment. As such, the preparation of an MND or EIR is not warranted.

