FINDINGS OF FACT (CEQA)

I. Introduction

The City of Los Angeles (the "City"), as Lead Agency, has evaluated the environmental impacts of implementation of the 520 Mateo Project, a new mixed use live/work, retail, office, restaurant, and cultural space complex, by preparing an environmental impact report ("EIR") (Case Number: ENV-2016-1795-EIR/State Clearinghouse No. 2016111043). The EIR was prepared in compliance with the California Environmental Quality Act of 1970, Public Resources Code Section 21000 et seq. ("CEQA") and the California Code of Regulations Title 15, Chapter 6 (the "CEQA Guidelines"). The findings discussed in this document are made relative to the conclusions of the EIR.

CEQA Section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" The procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." CEQA Section 21002 goes on to state that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles announced in CEQA Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See CEQA Section 21081[a]; CEQA Guidelines Section 15091[a].) For each significant environmental impact identified in an EIR for a proposed project, the approving agency must issue a written finding, based on substantial evidence in light of the whole record, reaching one or more of the three possible findings, as follows:

> 1) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant impacts as identified in the EIR.
>
> 2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been, or can or should be, adopted by that other agency.
>
> 3) Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Final Environmental Impact Report for the project as fully set forth therein. Although Section 15091 of the CEQA Guidelines does not require findings to address environmental impacts that an EIR identifies as merely "potentially significant", these findings nevertheless fully account for all such effects identified in the Final EIR for the purpose of better understanding the full environmental scope of the Project. For each environmental issue analyzed in the EIR, the following information is provided:

The findings provided below include the following:

- Description of Significant Effects - A description of the environmental effects identified in the EIR.

- Project Design Features - A list of the project design features or actions that are included as part of the Project.
- Mitigation Measures - A list of the mitigation measures that are required as part of the Project to reduce identified significant impacts.
- Finding - One or more of the three possible findings set forth above for each of the significant impacts.
- Rationale for Finding - A summary of the rationale for the finding(s).
- Reference - A reference of the specific section of the EIR which includes the evidence and discussion of the identified impact.

With respect to a project for which significant impacts are not avoided or substantially lessened either through the adoption of feasible mitigation measures or feasible environmentally superior alternatives, a public agency, after adopting proper findings based on substantial evidence, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's benefits rendered acceptable its unavoidable adverse environmental effects. (CEQA Guidelines §15093, 15043[b]; see also CEQA § 21081[b].)

Pursuant to CEQA Section 21081.6(a)(2) and CEQA Guidelines Section 15091(e), the documents and other materials that constitute the record of proceedings upon which the City has based its decision are located in and may be obtained from the Department of City Planning, as the custodian of such documents and other materials that constitute the record of proceedings, located at City Hall, 200 North Spring Street, Room 750, Los Angeles, CA 90012.

II. ENVIRONMENTAL DOCUMENTATION BACKGROUND

For purposes of CEQA and these Findings, the Record of Proceedings for the Project includes (but is not limited to) the following documents:

Notice of Preparation. In compliance with CEQA Guidelines §15375 and §15082, the City published the Notice of Preparation (the "NOP"), which was sent to responsible agencies and members of the public for a 30-day review period commencing November 16, 2016 and ending December 16, 2016, identifying the scope of the environmental issues. The purpose of the NOP was to formally convey that the City was preparing a Draft EIR for the proposed Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. The Initial Study and NOP are provided in Appendices A and B to the Draft EIR.

Public Scoping Meeting. A Public Scoping Meeting was held on December 16, 2016 at The Springs located at 608 Mateo Street, Los Angeles, CA 90021. The meeting was held in an open house or workshop format and provided interested individuals, groups, and public agencies the opportunity to view materials, ask questions, and provide oral and written comments to the City regarding the scope and focus of the Draft EIR. During the NOP comment period or at the scoping meeting, the City received comments from four agencies and organizations (South Coast Air Quality Management District, California Native American Heritage Commission, Southern California Association of Governments, and City of Los Angeles LA Sanitation, Wastewater Engineering Services Division) and from eighteen individuals. The letters and comments received during the NOP comment period are included in Appendix C of the Draft EIR.

Draft EIR. The Draft EIR for the Project, which is incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and City of Los Angeles (City) CEQA Guidelines (Public Resources Code Section 21000, et seq., 14 California Code of Regulations Section 15000, et seq., City of Los Angeles Environmental Quality Act Guidelines). The Draft

EIR evaluated in detail the potential environmental effects of the Project. The Draft EIR also analyzed the effects of five alternatives to the Project, as described below. These included a No Project Alternative, Reconfigured/Reduced Project, Reduced Commercial Density, Reduced Residential/Increased Commercial Density, and Apartments/Increased Commercial.

In accordance with the provision of Sections 15085(a) and 15087(a)(1) of the State CEQA Guidelines, the Draft EIR was distributed for public review (including the State Clearinghouse) for a 45-day review period (plus holidays), starting on December 21, 2017 and ending on February 6, 2018. A Notice of Completion and Availability ("NOA") was distributed to those public agencies that have jurisdiction by law with respect to the Project, or which exercise authority over resources that may be affected by the Project, and to other interested parties and agencies as required by law, which informed them of where they could view the document and how to comment. The Draft EIR was available to the public at City Hall, Department of City Planning, and the following local libraries: Los Angeles Central Library, Ben Franklin Branch Library, Chinatown Branch Library, and Little Pico Branch Library. A copy of the document was also posted online at https://planning.lacity.org/.

Final EIR. A total of 10 comment letters were received by the close of the public comment period. The specific and general responses to comments are in Section 2 (Responses to Comments) of the Final EIR. The Final EIR and responses to public agency comments were distributed on April 12, 2018.

Certification. On April 18, 2018, the Advisory Agency approved the tract map for the project and certified the EIR.

III. Project Description

The Project Site is located at 520 Mateo Street (with additional addresses of 524, 528, and 532 S. Mateo Street and 1310 E. 4th Place) within the Central City North Community Plan Area of the City of Los Angeles, approximately one mile east of the heart of Downtown Los Angeles. The Hollywood Freeway (US-101) and the Santa Monica Freeway (I-10) provide primary regional access to the Project Site. The Hollywood Freeway runs in a north-south direction east of the Project Site, while the Santa Monica Freeway runs in an east-west direction south of the Project Site. These two freeways also provide access to the Harbor Freeway (I-110) to the west, to the Santa Ana (I-5) freeway to the south, to the Golden State Freeway (I-5) to the north, and to the San Bernardino (I-10) and Pomona (SR-60) freeways to the east. Major surface street arterials within the vicinity include Alameda Street, Santa Fe Avenue, 4th Street, 6th Street, and 7th Street. The site is approximately 14 miles east of the Pacific Ocean.

The Project Site is located within the Central City North Community Plan area of the City of Los Angeles. The Community Plan area is generally bounded by Alameda Street and Macy Street/Sunset Boulevard on the west, Elysian Park on the north, the City of Vernon on the south, and the Los Angeles River on the east. The majority of the Central City North Community Plan area is developed with industrial and commercial land uses, including manufacturing and railroad-oriented properties. A mix of multiple-family residential development is located in the northwest portion of the Community Plan area, separated by the Chinatown district from the remainder of the Community Plan area. The Project Site is located within the Artists-in-Residence District (Arts District), which comprises a portion of the industrially zoned land in the central and southern portion of the Central City North Community Plan area.

The site is zoned M3-1-RIO. "M3" refers to Heavy Industrial Zone and "1" refers to Height District 1. "RIO" refers to the Los Angeles River Improvement Overlay District. The site is also located within the East Los Angeles State Enterprise zone and the Arts District Business Improvement District.

Existing Project Site Conditions

The Project Site is approximately 2.24 acres in size currently developed with a two-story, 80,736 square foot warehouse distribution building (containing four clothing distribution businesses as tenants) and surface parking/loading dock areas. The existing building was built in approximately 1988 and is approximately 30 years old. The building is a two-story tilt-up style concrete structure featuring loading bays and roll-up doors. A surface parking area is located on-site. Access to the site is provided from the surface parking lot located along the building's north side, with gated driveways leading to/from Mateo Street and Santa Fe Avenue. A row of trees is planted along the northern edge of the surface parking lot, adjacent to the 4th Place viaduct. None of the trees are protected trees under City ordinance.

Overview of Project and Alternative 4

The Project proposes the removal of all existing structures, and construction of a single 13-story building containing up to 600 live/work units, 20,000 square feet of office space, 15,000 square feet of restaurant space, 15,000 square feet of retail space, and 10,000 square feet of cultural space. Up to 11 percent of the base density would be set aside for affordable housing. A three-level subterranean parking garage would be located beneath the building, and additional parking would be provided on the ground and second levels of the Project.

The Project would be developed in a single building fronting on both Mateo Street and Santa Fe Avenue. Vehicular access would be provided from Santa Fe Avenue, while access from Mateo Street would be for pedestrians and bicycles only. A pedestrian paseo walkway would be located along the southern edge of the Site, connecting Mateo Street and Santa Fe Avenue.

The design of the Project would position the upper portion of the Project (levels 3 through 13 above the Project's podium base) in a "C" configuration around the Level 2 courtyard, reaching a continual height of 150 feet above ground level on the east, north, and west sides. Paseos along the northern and southern edges of the Project would be designed for pedestrian access. Project vehicular ingress and egress would occur from Santa Fe Avenue, providing access to the three subterranean parking levels, which would extend approximately 36 feet below grade.

The upper levels would contain most of the live/work units, with a few also located on the ground level. The units would include a mix of studios, one-bedroom and two-bedroom units.

The 30,000 square feet of retail/commercial uses within the Proposed Project would be located on the ground floor. Retail uses would include paseo-adjacent outdoor dining areas along the southern edge of the Project. The 20,000 square feet of office space within the Proposed Project would be located on the first and second levels. The 10,000 square feet of cultural use space within the Proposed Project would be located on the first level.

The Project would include 650 parking spaces, 540 spaces for the live/work units and 110 spaces for the commercial uses. The amount of parking complies with, among other provisions, Sections 12.24.X.13 and 12.21.A.4 of the Los Angeles Municipal Code ("LAMC") based on, among other factors, the Project's close proximity to alternative modes of transportation, the provision of live/work units, and on-site bicycle parking. The Project will provide, at a minimum, 78 short term and 621 long term bicycle spaces, consistent with LAMC requirements. The Project Site is located approximately 0.8 mile southeast of the Little Tokyo/Arts District Metro Gold Line Station. The Project Site is also served by Metro's Downtown DASH A bus line, which runs on weekdays along 3rd Street near the site, and Metro Local 18 bus service along 6th Street near the site on both weekdays and weekends.

A pedestrian paseo is proposed along the southern edge of the Project, featuring access to dining and shopping opportunities within the Project. This paseo would also provide a pedestrian passageway between Mateo Street and Santa Fe Avenue. A second paseo would be located adjacent to the north side of the Project. The Project will provide 66,750 square feet of open space in compliance with LAMC requirements.

In light of, among other factors, community support for a variation of the Project described and analyzed as Alternative 4 in the EIR, these Findings shall apply equally to Alternative 4.

The Reduced Residential/Increased Commercial Density (Alternative 4) would develop 125 fewer live/work units (475) and 85,000 square feet more office space (105,000) than the Proposed Project. The amount of retail and restaurant space built under Alternative 4 would be reduced by 5,000 square feet each, or 10,000 total square feet, as compared to the Project, and the cultural space would be eliminated. Alternative 4 would be configured differently across the Project Site than the Proposed Project. Alternative 4 would develop 475 live/work units, as well as 105,000 square feet of office, 10,000 square feet of retail, and 10,000 square feet of restaurant space. As with the Proposed Project, Alternative 4 would develop the live/work units in a tower building above a two-and-a-half level (above street grade) podium base that would contain the commercial uses and the above-grade parking spaces. However, under Alternative 4, the live/work units would be contained in a rectangular tower building occupying the east-central portion of the Project Site. The live/work tower would be 370 feet in height above street grade, including the rooftop penthouse. An elevated courtyard on top of the podium base would occupy the southeastern portion of the site and would contain a variety of open space amenities for the use of residents, tenants, guests, and visitors. This courtyard would be located approximately 35 feet above street grade. The office portion of the Project would be contained in a separate five-story tower on top of the podium base to the west of the live/work tower on the Mateo Street side of the site. The office component would have a height of approximately 91 feet above street grade, excluding mechanical rooftop extensions. 645 parking spaces would be provided, 475 spaces for the live/work units and 170 spaces for the commercial and office uses. Alternative 4 would provide a minimum of 52,825 square feet of open space in accordance with LAMC requirements.

Requested Entitlements

Approvals required for development of the project include but are not limited to, the following:

- Pursuant to LAMC Section 11.5.6, a General Plan Amendment (GPA) to amend the Central City North Community Plan land use designation of the Project Site from Heavy Manufacturing to Regional Center Commercial;

- Pursuant to LAMC Section 12.32 Q, a Vesting Zone Change and Height District Change to change the zoning of the Project Site from M3-1-RIO to C2-2-RIO;

- Pursuant to LAMC Section 16.05, Site Plan Review findings for a development project that results in an increase of 50,000 gross square feet or more of non-residential floor area, 50 or more dwelling units, and an addition of 1,000 or more average daily trips;

- Pursuant to LAMC Section 12.24 X.13, Zoning Administrator Determination findings to reduce parking in Joint Living and Work Quarters; and

- Pursuant to LAMC Section 17.00 et seq., Vesting Tentative Tract Map No. 74529 for a subdivision with one master lot and 15 airspace (16 lots total) for live/work and commercial condominium purposes.

IV. NO IMPACT OR LESS THAN SIGNIFICANT IMPACTS WITHOUT MITIGATION

Impacts of the Project and Alternative 4 that were determined to have no impact or be less than significant in the EIR (including having a less than significant impact as a result of implementation of project design features and regulatory compliance measures) and that require no mitigation are identified below. The City has reviewed the record and agrees with the conclusion that the following environmental issues would not be significantly affected by the Project and therefore, no additional findings are needed.

These findings do not repeat the full discussions of environmental impacts contained in the EIR. The City ratifies, adopts, and incorporates the analysis, explanation, findings, responses to comments, and conclusions of the EIR. The City adopts the reasoning of the EIR, City staff reports, and presentations regarding the Project.

Aesthetics

Under CEQA's Guidelines (Appendix G), a project could have a potentially significant impact related to aesthetics if it were to: (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; or (c) substantially degrade the existing visual character or quality of the site and is surroundings.

Under the L.A. CEQA Thresholds Guide, the determination of significance for the Project's impacts on visual resources and views shall be made on a case-by-case basis, considering factors related to visual resources and views.

Senate Bill (SB) 743, effective January 1, 2014, amended CEQA to provide that aesthetic impacts of mixed-use projects on an urban infill site within a transit priority area "shall not be considered significant impacts on the environment." On February 10, 2016, the City circulated Zoning Information File No. 2451 to clarify the locations of Transit Priority Areas within the City, and reaffirm that aesthetic impacts shall not be considered a significant impact on the environment when the provisions of SB 743 apply. The Project Site is located on an infill site, is a mixed-use project, and is located in a Transit Priority Area because it is within 0.5 mile of the intersection of Metro Bus Routes 18 and 60 at 7th Street and Alameda Street, which is defined as a Major Transit Stop. Accordingly, the Project's and Alternative 4's aesthetic impacts (including views, shade and shadow, and light and glare) are not considered significant because aesthetic impacts in transit priority areas are no longer considered to be an impact under CEQA. However, solely for informational purposes, this section provides an analysis of impacts and evaluates those impacts against the City's significance thresholds for such impacts applicable to areas of the City not designated as a transit priority areas.

Scenic Vistas

The Proposed Project's impacts with respect to scenic vistas would be less than significant. Alternative 4 would also have less than significant impacts. While the Project would increase building heights on the Project Site when compared to existing conditions, it would not substantially affect existing scenic vistas available from the 4th Street Bridge as there are no dominant visual features that would be obscured by development of the Project when viewed from this location. The Project Site and surrounding area are characterized by dense urban development. Due to existing industrial buildings, views toward the San Gabriel Mountains and Elysian Hills/Mount Washington to the north are currently partially obstructed. Views of the Los Angeles River are not available from the Project Site due to its placement within a flood control channel and development of the Project would not affect views of the river from the 4th Street

Bridge. Therefore, no impact with respect to scenic vistas would occur with development of the Project.

Although Alternative 4 would construct a taller building than the Proposed Project, it would still not affect scenic vistas or views of the River. Therefore, Alternative 4's impacts to scenic vistas would be less than significant. No mitigation measures are required, as no significant impacts associated with scenic vistas have been identified.

Scenic Resources

The Proposed Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. Therefore, no impact would occur. Nor would Alternative 4 cause such an impact for the same reasons.

A project may have a significant impact on scenic resources if the project would damage or remove scenic resources. The Project Site does not contain trees with scenic significance or rock outcroppings and is not located within a state scenic highway according to the California Scenic Highway Mapping System for Los Angeles County. In addition, no nearby scenic resources would be damages or removed by the Project. Therefore, as no scenic resources would be damaged or removed by the Project, no impact would occur with respect to a scenic resource. Similarly, Alternative 4 would cause no such impacts since it would not damage or remove any scenic resource. No mitigation measures are required because no significant impacts associated with scenic resources have been identified.

Visual Character of the Project Site During Construction

No impacts associated with visual character would occur during the construction of the Proposed Project or Alternative 4.

Construction activities at the Project Site associated with either the Proposed Project or Alternative 4 would be mostly visible from the surrounding uses, and are estimated to occur over approximately 30 months. Construction would involve three basic activities: (1) demolition, (2) excavation and grading, and (3) building construction. Construction activity would vary on a weekly basis, depending largely on the number of workers and construction trucks needed for the activities during each time period. Temporary fencing would be installed around the Project Site during construction, which would partially shield views of construction activities and equipment. Though construction activities under the Project would be visible from adjacent public and private vantage points, changes to the appearance of the Project Site would be temporary in nature. Temporary construction changes are necessary for the development of the Site and would not rise to the level of a change that would substantially degrade the existing visual character. Therefore, no significant aesthetic impacts would occur during construction of either the Proposed Project or Alternative 4. Alternative 4's impacts would be substantially similar and less than significant. No mitigation measures are required because no significant impacts associated with visual character of the Project Site during construction have been identified.

Visual Character of the Project's Design

Impacts to visual character of the design of either the Proposed Project or Alternative 4 would be less than significant. Under the L.A. CEQA Thresholds Guide, there are no aesthetic standards that apply to all areas of the City given the size and diversity of the City, including an extraordinary range of aesthetic characteristics and contrasts. The L.A. CEQA Thresholds Guide defers to the LAMC, community plans, and other applicable local land use plans for

specific guidelines and requirements related to aesthetics. Under the L.A. CEQA Thresholds Guide, aesthetic impact assessments should generally address the issue of visual contrast, or the degree to which elements of the environment differ visually. The L.A. CEQA Thresholds Guide also states that a degree of discretionary judgment may be required to determine the "value" of an aesthetic resource and potential project impacts.

With respect to architecture, both the Project and Alternative 4 would be designed in a modern architectural style, with articulated building facades and accent colors to provide visual interest. Building materials would be complementary and appropriate to the scale of the Project and adjacent existing buildings. Building materials such as metal panels, glass curtain walls, spandrel glass, stucco, stone veneer, perforated metal, and tile, which provide a rich texture to the buildings, enhancing a modern approach. Compliance with the design features listed below will provide further guidance to ensure variations in façade treatment and the use of high quality materials that add scale, texture, and variety. All mechanical and electrical equipment that is located on rooftops would be screened from public view. Areas of landscaping, outdoor plaza space, and other amenities would provide visual breaks in the view of the project buildings from Mateo Street and Santa Fe Avenue. Pedestrian-oriented paseos would be located on both the north and south sides of the Project Site, with the latter paseo activating a passageway between Mateo Street and Santa Fe Avenue providing access to various retail and restaurant uses. Overall, both the Project and Alternative 4 would result in less than significant impact with respect to architectural design.

Although no buildings in the vicinity are of a comparable height as the Project or Alternative 4, several proposals have been submitted to the City, including projects with 58-story towers and buildings 30 stories in height. The massing of the Project buildings would be softened by varying façade relief and would include landscaping to provide a visual break between the buildings. The principal difference in the bulk and visual massing associated with Alternative 4 as compared to the Proposed Project would rest in its perception from the Mateo Street streetscape adjacent to the Project Site on the west. Existing residential uses border this side of the site. The overall bulk of the building would be slimmer with Alternative 4 than with the Proposed Project, which would spread out the building's bulk horizontally across the entire site. Landscaping along the street edge would aid in softening this building frontage.

On the other hand, viewers from Santa Fe Avenue and 4th Street Bridge would perceive Alternative 4 as a high-rise structure. While this would also be true with the Proposed Project, it would be more so with the taller structure contemplated under Alternative 4. Even so, the application of the proposed design elements of the building's façade would work together to create a unified design. The use of recessed windows and open form structure would provide visual interest, and these architectural features would enhance the visual appeal of the proposed building and articulate the skyline when the structure is viewed from a distance. These materials and design features would create visual interest both vertically and horizontally on all building facades, further serving to break up visual massing.

Both Alternative 4 and the Project propose the creation of new live/work units and productive space designed to preserve the surrounding industrial and artistic character by mixing the typical industrial spaces with new productive uses. Considering the existing visual character of the Project Site and the continuing transformation of the surrounding Arts District, the architectural detail, building configuration, and design that would be constructed with development of the Project or Alternative 4, the height and massing would not be considered as detracting from the existing style or image of the area. Overall, development of the Project or Alternative 4 would result in less than significant impacts with respect to height and massing.

Under either Alternative 4 or the Proposed Project, extensive landscaped areas along the pedestrian paseo at the southern boundary of the Project Site, shaded walking paths, seating

areas, other common gathering areas, as well as seating, communal tables and public art, would be provided. Outdoor courtyards and open space amenities that would include outdoor gathering and recreation areas such as a pool, spa, lounge, greenhouse, and barbecue for those working and living on-site would also be provided. On the rooftop level, amenities would include a pool, urban garden, lounge, petanque court, and sunset deck. In sum, the proposed landscaping and open space would complement the visual character of the Project Site and surrounding area, and no impacts would occur.

Because redevelopment of a site located in the River Improvement Overlay (RIO) District, it will need to obtain administrative clearance from the Department of City Planning illustrating compliance with the RIO landscaping and design standards. The landscaping proposed for the Project and Alternative 4 has been designed to comply with the design standards identified in the RIO.

No mitigation measures are required because impacts to visual character will be less than significant.

Views and Viewsheds

The Proposed Project's impacts to views and viewsheds would be less than significant. Alternative 4 would also have less than significant impacts to views and viewsheds. No officially designated or eligible State- or City-designated scenic highways are located adjacent to, or within view of, the Project Site. Furthermore, the Project Site and the surrounding area are characterized by dense urban development, and no views would be significantly changes or obstructed. Both the Project and Alternative 4 would be consistent with the policies contained in the Central City North Community Plan and also the design policies contained in Chapter V. of the Community Plan related to multi-family residential and commercial uses. As such, neither the Project nor Alternative 4 would result in any significant impact related to applicable policies and regulations relating to aesthetics or views. No mitigation measures are required because no significant impacts associated with views and viewsheds have been identified. The following Project Design Features would reduce impacts:

Project Design Features

AES-PDF-1 – All mechanical and electrical equipment that is located on the rooftops would be screened from public view.

AES-PDF-3 – Utility equipment would be placed underground, screened from public view, or incorporated into the design of the Project.

Alternative 4 would comply with these Project Design Features.

Shade and Shadows

The Proposed Project would not lead to impacts with respect to shading or shadows. Nor would Alternative 4 lead to any such significant impacts. The Project Site is located on an infill site, is a mixed-use project, and is located in a Transit Priority Area. Accordingly, aesthetic impacts are not considered significant because in accordance with SB 743 aesthetic impacts in transit priority areas are no longer considered to be an impact under CEQA. However, solely for informational purposes, this section provides an analysis of impacts to shading and shadows and evaluates those impacts against the City's significance thresholds for such impacts applicable to areas of the City not designated as a transit priority area.

Under the L.A. CEQA Thresholds Guide, a project may have a significant shadow impact if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time (between October and early April) or for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time (between early April and late October). Shadow effects are dependent on several factors, including local topography, the height and bulk of a project's structural elements, sensitivity of surrounding uses, season, and duration of shadow projection. In determining the effects of shading, the locations of sensitive uses (such as residential uses and recreational areas) in the surrounding area are identified and the shading effects are considered according to standard criteria. Impacts are determined according to the proposed building heights and the distance from the light obstructing structures to the sensitive uses.

For the Project's summer shadows, no sensitive uses would be shaded for more than four hours between the hours of 9:00 AM and 5:00 PM. For the spring/fall shadows, no sensitive uses would be shaded for more than four hours between the hours of 8:00 AM and 4:00 PM. For the Project's winter shadows, no sensitive uses would be shaded for more than three hours between the hours of 9:00 AM and 3:00 PM. As such, the Project would have no impacts with respect to summer shadows, shadows during the spring and fall equinox, or with respect to winter shadows.

With respect to cumulative impacts, the Proposed Project would fully shade Cumulative Project No. 86 during the winter solstice, but would only provide minimal shading on the summer solstice. Restaurant uses are not typically considered shade sensitive, with the exception of any outdoor dining areas that may be included in the cumulative project. Since it is unknown whether or not exterior dining spaces are to be included as part of Cumulative Project No. 86, or whether such spaces would be in use during the wintertime, it cannot be determined whether or not the Proposed Project would create a significant shadow impact at this location. However, in the event that this project would include an outdoor dining area that would be in use on a year-round basis, it can be assumed that the Proposed Project would cast shadows onto this sensitive use in excess of the City's wintertime three-hour threshold. However, since the Proposed Project falls within the applicable definitions in SB 743, the Project's shading impacts at this location would not be considered significant and no mitigation would be required.

Overall, the summer and winter shading impacts of Alternative 4 would affect neighboring shade-sensitive land uses to a greater degree than with the Proposed Project, but Alternative 4 would still not exceed the City's significance thresholds. No mitigation measures are required because no significant impacts associated with shadows have been identified.

Nighttime Light and Daytime Glare

Incorporation of Project Design Features would ensure that potential impacts to nighttime light remain less than significant. Impacts related to nighttime light would be less than significant. Alternative 4 would also have less than significant impacts. Senate Bill (SB) 743, effective January 1, 2014, amended CEQA to provide that aesthetic impacts of mixed-use projects on an urban infill site within a transit priority area "shall not be considered significant impacts on the environment." The City circulated Zoning Information File No. 2451 to clarify the locations of Transit Priority Areas within the City, and reaffirm that aesthetic impacts shall not be considered a significant impact on the environment when the provisions of SB 743 apply. The Project Site is located on an infill site, is a mixed-use project, and is located in a Transit Priority. Accordingly, aesthetic impacts are not considered significant because aesthetic impacts in transit priority areas are no longer considered to be an impact under CEQA. However, solely for informational purposes, this section provides an analysis of impacts to light and glare and evaluates those impacts against the City's significance thresholds for such impacts applicable to areas of the City not designated as a transit priority area.

Under the CEQA Guidelines, a project could have a significant impact related to light and glare if it would create a new source of substantial light or glare which would adversely affect the day or nighttime views the area. Under the L.A. City CEQA Thresholds Guide, a project's potential impacts related to light and glare should be made on a case-by-case basis considering the following two factors: (1) the change in ambient illumination levels as a result of project sources; and (2) the extent to which project lighting would spill off the project site and affect adjacent light-sensitive areas.

As Project Design Features, the Project would include lighting designed to highlight architectural elements of the structure. Security lighting would be installed to deter criminal activity on the Project Site. The lights associated with the Project would be directed toward the interior of the Project Site so as not to create impacts to surrounding land uses or motorists traveling on surrounding roadways. All exterior lighting would be designed with internal and/or external glare control and would also be designed, arranged, directed, or shielded to contain direct illumination on-site, thereby preventing exceed illumination and light spillover onto adjacent land uses and/or roadways (see also Project Design Feature AES-PDF-4). Blinking, flashing, or oscillating lights would be prohibited. As such, the potential impact resulting from lighting associated with architectural elements, security, and signage would be less than significant and no mitigation is required.

Due to its scale in relation to existing development in the Project vicinity, light generated from the interior of the proposed building could potentially be seen from substantial distances from the Project Site. However, the increase in light that would be generated would not be out-of-character with the existing light sources in the Project vicinity. Furthermore, it is anticipated that the light generated from the Project would not be bright enough to affect the nearby residences. Per the Project Design Features, the exterior of the proposed building would be articulated and constructed of materials such as metal, concrete, and glass with low-reflectivity, which would not be expected to affect daytime views. The Project's sources of glare that would be introduced into the Project area would not result in hazardous conditions to motorists or result in substantial glare due to the various features designed to minimize glare-related impacts, and impacts would be less than significant.

Since Alternative 4 would incorporate the same Project Design Features, Alternative 4 would not cause significant impacts due to nighttime lighting or glare.

Nighttime views and daytime glare within the Project vicinity would not be affected and impacts would be less than significant. Therefore no mitigation is required. However, Project Design Features AES-PDF-4 through 6 will ensure impacts associated with the Project or Alternative 4 would remain less than significant.

Project Design Features

AES-PDF-4 – The Project shall include security lighting. Lighting associated with the Project shall be directed downward or toward the interior of the Project Site. All exterior residential lighting shall be designed with internal and/or external glare control and shall be designed, arranged, directed, or shielded to contain direct illumination on-site, thereby preventing excessive illumination and light spillover onto adjacent land uses and/or roadways.

AES-PDF-5 – The exterior of the proposed structures shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

AES-PDF-6 – Tenant signs for the ground-floor retail and restaurant uses shall not include blinking, flashing, or oscillating lights.

These same Project Design Features shall apply to Alternative 4.

Cumulative Impacts

Neither the Proposed Project nor Alternative 4, in conjunction with the Related Projects, would not have significant cumulative impacts associated with aesthetics. With respect to the visual character of the Project Site, the Related Projects are subject to applicable development standards and environmental review. Two of these cumulative projects would be located close enough to the Project Site to potentially combine with the Project to produce substantial illumination and/or glare visible from the surrounding vicinity. One of these projects would produce some nighttime lighting but would not affect any existing residences as the Proposed Project or Alternative 4 would be located in between this cumulative project and the nearest residences.

Due to its scale in relation to existing development in the area, light generated from the interior of the Project could potentially be seen from more distant areas around the Project Site. As such, the Project and cumulative projects would contribute to ambient light levels within the surrounding area. However, as discussed above, this is a heavily urbanized area and the presence of additional nighttime illumination resulting from the Proposed and cumulative projects would not represent an alteration to the existing nighttime visual environment. Additionally, the potential increase in nighttime light resulting from the Project would not be bright enough to substantially affect nearby sensitive uses. Therefore, the contribution of the Project to this potential cumulative impact would not be substantial, and a less than significant impact would occur.

As discussed above, the Project's architectural features and facades would not be constructed of highly reflective materials. Furthermore, the Project's sources of glare that would be introduced into the Project area would not result in hazardous conditions due to the various features designed to minimize glare-related impacts. Therefore, the Project's contribution to cumulative glare would not be substantial and a less than significant impact would occur. Alternative 4's contribution to cumulative glare and nighttime lighting would be less than significant. No mitigation measures are required because no significant cumulative impacts associated with aesthetics have been identified.

Agricultural and Forestry Resources

The Proposed Project would cause no impacts on agricultural or forestry resources. Similarly, Alternative 4 would cause no such impacts. Under the CEQA Guidelines, a project may have a significant impact on agricultural or forestry resources if it were to result in (a) the conversion of state-designated agricultural land from agricultural use to another non-agricultural use; (b) conflicts with zoning for agricultural use; (c) conflicts with existing zoning or cause rezoning of forest/timber land; (d) result in the loss of forest land; or (e) other changes in the existing environment that could result in conversion of Farmland to non-agricultural use. The Project Site is currently developed with a warehouse distribution center. The Project Site does not contain any agricultural uses, and is not delineated as such on any maps prepared pursuant to the state's Farmland Mapping and Monitoring Program. The Site is zoned Heavy Industrial (M3-1-RIO). No Williamson Act Contract applies to the Project Site. Therefore, no impact would occur. Since Alternative 4 would be constructed on the same Project Site, it would similarly result in no impacts on agricultural or forestry resources.

No mitigation measures are required, as no significant impacts associated with agricultural or forestry resources have been identified.

Air Quality

Under CEQA's Guidelines, a project may have a significant air quality impact if the project would cause any of the following: (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 in non-attainment under an applicable federal or State ambient air quality standard; (d) expose sensitive receptors to substantial pollutant concentrations; or (e) create objectionable odors affecting a substantial number of people.

The City has not adopted specific citywide significance thresholds, but instead relies on regional significance thresholds identified by the South Coast Air Quality Management District ("SCAQMD") in its CEQA Air Quality Handbook ("SCAQMD CEQA Handbook") as revised in November 1993 for construction and operational emissions impacts. The City's analysis of air quality impacts was prepared consistent with applicable SCAQMD guidance as well CalEEMod guidance, including the User's Guide.

Construction Phase Impacts – Regional Impacts

The Proposed Project's construction would lead to less than significant regional impacts during construction. Alternative 4 would also lead to less than significant impacts during construction. Construction could impact air quality through the use of heavy-duty construction equipment on- and off-site, heavy-duty trucks hauling material to and from the site, as well as vehicle trips generated by construction workers traveling to and from the Project Site. The Project's daily construction emissions would not exceed any of the SCAQMD regional pollutant thresholds during the construction process and therefore would cause a less than significant impact. Similarly, Alternative 4's daily construction emissions would not exceed SCAQMD thresholds and would only cause a less than significant impact. No mitigation measures are required because no significant regional impacts related to construction have been identified.

Construction Phase Impacts – Toxic Air Contaminants

The Proposed Project's construction would cause no impacts related to toxic air contaminants. Likewise, Alternative 4 would cause no such impacts. For Toxic Air Contaminants ("TAC"), the greatest potential for TAC emissions during construction would be diesel particulate emissions associated with heavy-duty equipment operations. Health effects from carcinogenic air toxics are usually described in terms of individual cancer risk, which is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the short-term construction schedule of approximately two years, construction of neither Alternative 4 nor the Project would represent a long-term (i.e., 70 years) source of TAC emission. No residential emission and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period during construction, construction-related TAC emission would not produce chronic exposure to TACs, and no significant impact would occur.

The Draft EIR's analysis of potential health risks from TAC emissions during the construction phase is consistent with SCAQMD's guidance on this topic and their comment letter in response to the Notice of Preparation (attached as Appendix C to the Draft EIR). Specifically, as pertinent to the Project and Alternative 4, SCAQMD recommends that health risk assessments ("HRA") be considered for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel

emissions. But since neither the Project nor Alternative 4 are the type that would emit substantial amount of diesel PM, a HRA is not required under the applicable SCAQMD guidance.

Therefore, no mitigation measures are required because no significant impacts related to toxic air contaminants from construction have been identified.

Construction Phase Impacts – Odors

The Proposed Project's construction would cause no impacts related odors. Similarly, Alternative 4 would cause no such impacts. Potential sources that may emit odors during construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the immediate area surrounding the Project Site. Given the current density of commercial development and auto traffic from major and minor arterials adjacent to Mateo Street, any odor impacts from the construction phase will likely not adversely impacts local residents or sensitive receptors. Both Alternative 4 and the Project would utilize typical construction techniques, and odors would be typical of most construction sites and temporary in nature. Because construction of neither Alternative 4 nor the Project is expected to cause an odor nuisance, no significant impact would occur. No mitigation measures are required, as no significant impacts related to odors from construction have been identified.

Operational Phase Impacts – Regional Impacts

The Proposed Project's operation would lead to less than significant regional impacts. Alternative 4 would also less to less than significant regional impacts on air quality. Both Alternative 4 and the Project would produce long-term air quality impacts to the region primarily from motor vehicles that access the Project Site. However, regional net operational emissions of Alternative 4 or the Proposed Project would not exceed any of the applicable SCAQMD significance thresholds. Therefore, impact on regional air quality is considered less than significant. No mitigation measures are required because no significant regional impacts related to the Project's operation have been identified.

Operational Phase Impacts – Local Impacts

Neither Alternative 4's nor the Project's localized emissions would approach the SCAQMD's localized significance thresholds for human health impacts at nearby sensitive receptors during long-term operations. Impacts would be less than significant. With regards to local air quality impacts, both Alternative 4 and the Proposed Project would generate only negligible pollutant concentrations of CO, NO2, PM2.5, or PM10 at sensitive receptors and would be considered less than significant. In addition, long-term operations of the Project or Alternative 4 would not result in exceedances of CO air quality standards at roadways in the area. Thus, both the Project and Alternative 4 would have less than significant impacts. No mitigation measures are required because no significant impacts related to localized air emissions from the Project's operation have been identified.

Operational Phase Impacts –Toxic Air Contaminants

Neither operation of the Proposed Project nor Alternative 4 will include typical sources of acutely and chronically hazardous TAC emissions such as industrial manufacturing processes or automotive repair facilities and therefore the Project is not expected to result in significant TAC emissions. Per SCAQMD guidance, a health risk assessment is not required to assess operational impacts for either the Project or Alternative 4, since neither include typical sources of TAC, and neither are the type that would emit substantial amount of diesel PM. Nor is the

Proposed Project anticipated to generate a substantial number of truck trips, which can be a source of TAC emissions. Based on the limited activity of TAC sources, any minimal TAC impacts from the Project would be less than significant. For the same reasons, Alternative 4 would not cause any significant impacts due to TAC emissions. This conclusion, and the Draft EIR's methodology supporting it, are consistent with applicable SCAQMD guidance and the agency's comment letter in response to the Notice of Preparation (attached as Appendix C to the Draft EIR).

The Project includes live/work units that could be exposed to existing sources of TACs in the local area. Localized air pollution impacts from incompatible land uses can occur when polluting sources (e.g., heavily trafficked roadways, warehousing facilities, or industrial facilities) are located near a land use where sensitive individuals are planned (e.g., school, hospital, or homes). None of the industrial, commercial, or residential uses near the Project Site are known to be incompatible with the proposed residential uses. As a result, the Project would not locate residential or other sensitive uses near existing sources of TACs in the Project area, and no impacts would occur. For the same reasons, Alternative 4's impacts would be substantially similar and less than significant. No mitigation measures are required because no significant impacts related to toxic air contaminants from the Project's operation have been identified.

Operational Phase Impacts – Odors

Impacts related to odors from the Project's operation would be less than significant. Alternative 4 would also have less than significant impacts. Neither Alternative 4 nor the Project would include land uses and industrial operations typically associated with odor complaints, such as agricultural uses, wastewater treatment plants, good processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Any unpleasant odors from the restaurants can be ad-dressed by SCAQMD's Rule 402, which governs nuisances. Therefore, neither Alternative 4 nor the Project would have no impact with respect to odors. No mitigation measures are required because no significant impacts related to odors from the Project's operation have been identified.

Biological Resources

The Proposed Project would cause no impacts on biological resources. Similarly, Alternative 4 would cause no such impacts. Under the CEQA Guidelines, a project may have a significant impact on biological resources if it (a) has a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or the U.S. Fish and Wildlife Service; (b) has a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, or regulations by the California Department of Fish and Game or the U.S. Fish and Wildlife service; (c) has a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means; (d) may 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) may conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or (f) may conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

The Project Site is located in an urbanized area of the City and is currently developed with a warehouse and minimal landscaping. The Project Site does not contain any natural open spaces, act as a wildlife corridor, or possess any areas of significant biological value. No

hydrological features are present on the Site and there are no sensitive habitats present. Due to the lack of biotic resources, no candidate, sensitive, or special status species identified in local plans, policies, or regulations by the California Department of Fish and Wildlife, the California Native Plant Society, or the U.S. Fish and Wildlife Service would be expected to occur on the Project Site. There are also no riparian areas located on or adjacent to the Project Site. The Project would not involve changes in the existing environment that could interfere with the movement of migratory birds or other wildlife species. No bodies of water exist on the Project Site to provide habitat for fish. The Project Site is also not located in or adjacent to an existing or proposed Significant Ecological Area. Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that applies to the Project Site. Based on the conditions on and surrounding the Project Site and the proposed work on the Project Site, the Project will have no impact on biological resources with respect to candidate, sensitive, or special status species, riparian habitat, wetlands, migratory fish or bird species, or adopted conservation plans.

Local ordinances protecting biological resources are limited to the City of Los Angeles Protected Tree Ordinance, as modified by Ordinance 177,404. No protected trees are located on or adjacent to the Project Site. If the Project proposes the removal of the City of Los Angeles right-of-way trees along Santa Fe Avenue, a permit would need to be obtained from the City's Urban Forestry Division. Further, any tree removal would need to comply with the ordinance. Therefore, the Project would not conflict with any tree preservation policy or ordinance, and no impacts would occur. For the same reasons, Alternative 4 would also result in no impacts to biological resources because it would be constructed on the same Project Site.

No mitigation measures are required, as no significant impacts associated with biological resources have been identified.

Cultural Resources

The Proposed Project would not cause a significant impact to historical resources, archaeological resources, paleontological resources, cultural resources or human remains. For the same reasons discussed below, Alternative 4 would result in less than significant impacts to such resources. Under the CEQA Guidelines, a project may have a significant impact on cultural resources if it (a) will cause a substantial adverse change in significance of a historical resource as defined in CEQA Guidelines section 15064.5; (b) will cause a substantial adverse change in significance of an archaeological resource pursuant to CEQA Guidelines section 15064.5; (c) will directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or (d) will disturb any human remains, including those interred outside of formal cemeteries.

For historical resources, the State Office of Historic Preservation recommends that properties over 45 years of age be evaluated for their potential as historic resources. The building on the Project Site is approximately 29 years old. Thus, the existing building is neither listed nor expected to be listed in an historical register. No nearby historical resources would be impacted by the Project.

For archaeological resources, the search of the California Historical Resources Information System (CHRIS) resulted in the identification of 10 previously recorded historic archaeological resources —all of which are located outside the Project Site. While four of the study areas intersected the Project Site, none included an archaeological assessment of the Project Site. Archival research identified other nearby historical water conveyance features including Zanja No. 1, historically located approximately 70 feet west of the Project Site along the west side of Mateo Street. Review of historical maps and descriptions of Zanja No. 1 suggest it is very unlikely any material remains are preserved within the Project Site. It is therefore concluded that

the Project Site has a low sensitivity for containing archaeological resources attributable to Zanja No. 1. Additionally, a Sacred Lands File Search was performed by the NAHC for the Project Site on December 20, 2016. The results of this search were negative.

Under California Public Resources Code Section 21083.2, development projects that involve excavations are required to implement the following measures: If any archaeological materials are encountered during the course of Project development, all further development activity in the vicinity of the materials shall halt and: (a) The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. (b) The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource. (c) The Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report. (d) Project development activities may resume once copies of the archaeological survey, study or report are submitted to: SCCIC Department of Anthropology, McCarthy Hall 477, CSU Fullerton, 800 North State College Boulevard, Fullerton, CA 92834. (e) Prior to the issuance of any building permit, the Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered. (f) A covenant and agreement binding the Applicant to this condition shall be recorded prior to the issuance of a grading permit. Implementation of these requirements pursuant to Public Resources Code Section 21083.2 would ensure that Project impacts to unknown archaeological resources would be less than significant. Based upon the recommendation of the NAHC, the following Conditions of Project Approval will also be applied by the City to the Project to ensure that unknown archaeological resources, if encountered, are properly identified and handled. (1) The Project Applicant shall retain a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Standards for professional archaeology, during the excavation phase to carry out the measures related to archaeological resources described below. (2) Prior to the commencement of demolition and excavation, an Archaeological Resources Monitoring Plan (Monitoring Plan) shall be prepared. The Monitoring Plan shall include, but not be limited to, a construction worker training program; monitoring protocol for excavation activities; and discovery and processing protocol for inadvertent discoveries of archaeological resources. The plan should identify areas with moderate to high sensitivity determined for archaeological resources that require monitoring and detail a protocol for determining circumstances in which additional or reduced levels of monitoring (e.g. spot checking) may be appropriate. Specifically, the Monitoring Plan should include a framework for assessing the geoarchaeological setting to determine whether sediments capable of preserving archaeological remains are present, and the depth at which these sediments would no longer be capable of containing archaeological material. (3) Prior to excavation, a qualified archaeologist shall be retained to monitor excavation activities as stipulated in the Monitoring Plan. Specifically, field observations regarding the geoarchaeological setting should be taken to determine whether undisturbed sediments capable of preserving archaeological remains, and the depth at which these sediments would no longer be capable of containing archaeological material. The duration and timing of the monitoring shall be determined by the qualified archaeologist in consultation with the Los Angeles Department of City Planning and the Project Applicant. The archaeological monitor shall work under the supervision of the qualified archaeologist. At the conclusion of monitoring activities, a technical report will be prepared by a qualified archaeologist documenting the methods and results of all work completed under the Monitoring Plan and submitted to City Planning and the SCCIC.

For paleontological resources, according to the Natural History Museum of Los Angeles County, there are no known paleontological resources within the Project Site. However, the excavation for the subterranean parking levels has the potential to affect unknown paleontological

resources. Although the younger Quaternary alluvium deposits underlying the Project Site do not contain significant fossil vertebrates at shallow levels, the underlying older Quaternary deposits found at varying depths may contain vertebrate fossils. Under California Public Resources Code Sections 5097.5, development projects that involve excavations are required to implement the following measures, which will ensure that if any such resources are found during construction of the Project, they would be handled according to the proper regulations, and impacts to potential paleontological resources that may exist beneath the Project Site would be less than significant. If any paleontological materials are encountered during the course of project development, all further development activities in the vicinity of the materials shall halt and: (a) The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. (b) The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource. (c) The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study, or report. (d) Project development activities may resume once copies of the paleontological survey, study, or report are submitted to the Los Angeles County Natural History Museum. (e) Prior to the issuance of any building permit, the Applicant shall submit a letter to the case file indicating what, if any, paleontological reports have been submitted, or a statement indicating that no material was discovered. (f) A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

For human remains, the Project Site is located in a heavily urbanized area, and is currently developed with a warehouse building. The likelihood of encountering human remains on the Project Site is minimal. According to the Native American Heritage Commission, the Sacred Lands File search did not indicate the presence of any resources within the Project Site. However, during the construction and excavation of the Project Site, there is a possibility that human remains could be encountered. Under California Health and Safety Code Section 7050.5 and Native American Heritage Commission (NAHC) regulations (Public Resource Code Section 5097), development projects that involve excavations are required to implement the following measures: In the event that human remains are discovered during excavation activities, the following procedure shall be observed: (a) Stop excavation immediately in the vicinity of the remains and contact the County Coroner at: 1104 N. Mission Road, Los Angeles, CA 90033, 323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or 323-343-0714 (After Hours, Saturday, Sunday, and Holidays). (b) The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission. (c) The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American. (d) The most likely descendent has 48 hours after being allowed access to the site to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. (e) If the most likely descendent does not make recommendations within 48 hours after being allowed access to the site, the Applicant shall reinter the remains in an area of the property secure from further disturbance. (f) If the Applicant does not accept the most likely descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission. Implementation of these requirements pursuant to California Health and Safety Code Section 7050.5 and Native American Heritage Commission (NAHC) regulations (Public Resource Code Section 5097) would ensure that Project impacts to unknown human remains or tribal cultural resources would be less than significant. Based upon the recommendation of the NAHC, the Conditions of Project Approval shown above would also be implemented to ensure that unknown human remains or tribal cultural resources, if encountered, are properly identified and handled.

The City complied with the requirements of AB 52 and SB 18 by issuing notification letters concerning the Proposed Project to all California Native American Tribes that are traditionally and culturally affiliated with the Los Angeles area. These letters were sent on November 15, 2016. The City did not receive any requests from Tribal organizations to initiate formal consultation regarding the Proposed Project.

Since Alternative 4 would involve similar excavation work at the same Project Site, as well as incorporate the same measures described above, Alternative 4 would not cause any significant impacts to cultural resources.

No mitigation measures required, as the Project will not lead to significant impacts related to cultural resources. The regulatory requirements set forth above will ensure that impacts are less than significant.

Geology and Soils

Under CEQA's Guidelines, a project may have a significant impact to geology and soils if the project would result in one or more of the following: (a) exacerbate existing environmental conditions so as to increase the potential to expose people or structures to potential substantial adverse effects, including risk of loss, injury, or death involving – (i) rupture of a known earthquake fault, (ii) strong seismic ground-shaking, (iii) seismic-related ground failure, including liquefaction, or (iv) landslides; (b) result in substantial soil erosion or the loss of topsoil; (c) be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially resulting in on- or off-site landslide, lateral spreading, subsistence, liquefaction, or collapse caused in whole or in part by the project's exacerbation of the existing environmental conditions; (d) be located on expansive soil, creating substantial risks to life or property caused in whole or in part by the project exacerbating the expansive soil conditions; or (e) have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

The L.A. CEQA Thresholds Guide requires the geotechnical analysis to address the following areas of study (1) geologic hazards; (2) sedimentation and erosion; (3) landform alternation; and (4) mineral resources. The City concluded in the initial study that the Project would not result in impacts related to mineral resources, as discussed further above in Section 4.1.4.

Fault Rupture

Neither the Proposed Project nor the Alternative 4 would lead to significant impacts related to fault rupture. Fault rupture is defined as the surface displacement that occurs along the surface of a fault during an earthquake. The City of Los Angeles Seismic Safety Element does not include the Project Site within an Alquist-Priolo Special Study Zone or Fault Rupture Study Area. The nearest fault, the Puente Hills Blind Thrust Fault, is approximately 1.7 miles away.

Both Alternative 4 and the Project would comply with the CGS Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California (1997), which provides guidance for the evaluation and mitigation of earthquake-related hazards, and with the seismic safety requirements in the UBC and the LAMC. Further, the City of Los Angeles Building Code contains construction requirements to ensure that structures are built to a level such that they can withstand acceptable seismic risk. Therefore, by virtue of compliance with regulations requiring implementation of the recommendations in the geotechnical investigation for the Project, neither Alternative 4 nor the Project would expose people or structures to substantial adverse effects associated with fault rupture, and no significant impact would occur. Because Alternative 4 would be built on the same Site, and would equally comply with existing regulations, its impacts would also be less than significant.

No mitigation measures are required because no significant impacts related to fault rupture have been identified.

Strong Seismic Ground Shaking

Compliance with existing regulations will ensure that the Proposed Project would have no impacts related to strong seismic ground shaking. No significant impacts would occur. Similarly, Alternative 4 would cause no such impacts. A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region.

Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the southern California region and would minimize the potential to expose people or structures to substantial risk, loss, or injury. Therefore, no impacts related to seismic ground shaking would occur. Since Alternative 4 would also comply with such codes and practices, Alternative 4 would not cause any such significant impacts.

No mitigation measures are required because no significant impacts related to strong seismic shaking have been identified.

Liquefaction

The Proposed Project's impacts with respect to liquefaction would be less than significant. Alternative 4 would also have less than significant impacts with respect to liquefaction. Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when certain types of soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Low groundwater table and the presence of loose medium dense sand and silty sand are factors that could contribute to the potential for liquefaction. The Project Site is not identified by ZIMAS and the State Seismic Hazard Zone Map as being within a liquefaction zone. In addition, the City of Los Angeles Seismic Safety Element does not identify the Project Site as being located within a potentially liquefiable area. As explained in Appendix H, Report of Geotechnical Investigation, attached to the Draft EIR, a review of data from nearby water monitoring wells indicates that groundwater occurs at a depth of approximately 100 feet in the vicinity of the Project Site. In addition, no groundwater was encountered in the test borings performed up to 50 feet below existing grade for this investigation. The lowest excavation proposed for the Project and Alternative 4 would be well above the lowest estimated groundwater. Thus, the potential for liquefaction to occur at the site is considered to be low and Project impacts related to liquefaction would be less than significant. Because Alternative 4 would be constructed on the same Site, its impacts would also be less than significant.

No mitigation measures are required because no significant impacts with respect to liquefaction have been identified.

Landslide

The Proposed Project would not lead to significant impacts related to landslides. Similarly, Alternative 4 would not cause any such impact. A significant adverse effect may occur if a project is located in a hillside area with soil conditions that would suggest high potential for sliding. Landslides can occur on slopes under normal gravitational forces and during

earthquakes when strong ground motion can cause failure. Landslides tend to occur in loosely consolidated, wet soil, and/or rock on unstable sloping terrain. The Project Site is relatively flat and not near any hillside areas. The Project Site is not classified as a landslide hazard zone in the State Seismic Hazard Zones Map. The Project Site is also not identified by ZIMAS as being within a landslide hazard zone. Finally, the City of Los Angeles Seismic Safety Element shows that the Site is not within a landslide area. Therefore, no impact with respect to landslides would occur. For the same reasons, Alternative 4 would also cause no significant impacts due to landslide.

No mitigation measures are required because no significant impacts related to landslides have been identified.

Substantial Soil Erosion or Loss of Topsoil

The Proposed Project's impacts to substantial erosion or the loss of topsoil would be less than significant. Alternative 4 would also have less than significant impacts. A project may have a significant impact if it exposes large areas to the erosional effects of wind or water for a protracted period of time. The Project Site is located in an urbanized portion of Los Angeles and is completely paved and developed with an industrial warehousing facility. Any topsoil that may exist on the site was previously blended with other on-site soils during previous site preparation/grading activities. As such, neither development of Alternative 4 nor the Project would result in substantial loss of topsoil.

Construction activities such as grading and excavation could create the potential for soil erosion. Yet the potential for soil erosion on the Project Site is low due to the general level topography of the Project Site and the presence of existing off-site drainage facilities. Construction would require the removal of existing pavement and grading earth and excavation. Conformance with the City Building Code Sections 91.7000 through 91.7016, which include construction requirements for grading, excavation, and use of fill, would reduce the potential for wind or waterborne erosion. Additionally, the City's Building Code requires an erosion control plan to be reviewed by the Department of Building and Safety prior to construction if grading exceeds 200 cubic yards and occurs during the rainy season. As the Project would comply with all mandatory Code requirements, project impacts related to soil erosion during construction would be minimal. The potential for soil erosion during operation would be relatively low due to the urban nature of the Project area and the general level of topography of the Project Site. The Project would develop the entire Project Site with new buildings, paving, and surface treatment. As such, no significant impacts would occur. Since Alternative 4 would comply with the same regulations and be built on the same site, Alternative 4 would not cause any significant impact.

No mitigation measures are required because no significant impacts related to substantial soil erosion or loss of topsoil have been identified.

Soil Stability

The Proposed Project's impacts on soil stability will be less than significant. Alternative 4's impacts would also be less than significant. A project may have a significant impact related to soil stability if the Project is built in an unstable area without proper site preparation or design features to provide adequate foundations for the project buildings, thus posing a hazard to life and property. Construction activities must comply with the City's Building Code, which is designed to ensure safe construction, including building foundation requirements appropriate to site conditions. The Project Site is not at risk for landslides, as the Project Site is relatively level with very little elevation change. The potential for slope stability hazards is considered low.

Some seismically-induced settlement of the proposed structures should be expected as a result of strong ground-shaking. However, due to the uniform nature of the underlying geologic materials, excessive differential settlements are not expected to occur. Preliminary geotechnical studies and exploratory borings on the Project Site indicate that the site's geology is stable and can support the Project's proposed structure using spread foundation systems that are founded in the dense, naturally deposited soils expected to occur at the lowest level of construction. As noted above, the Project would be required to conform to the Uniform Building Code seismic standards as approved by the Department of Building and Safety. Overall, Project impacts with respect to soil stability would be less than significant. Alternative 4's impacts would be substantially similar and less than significant since it would comply with the same regulations and be built on the same site.

No mitigation measures are required because no significant impacts related to soil stability have been identified.

Septic Tanks

The Proposed Project would not lead to significant impacts related to septic tanks. Alternative 4 would also lead to no such impacts. A project may have a significant impact related to septic tanks if the project is located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City, which is served by a wastewater collection, conveyance, and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no significant impacts would occur. The same is true for Alternative 4.

No mitigation measures are required because no significant impacts related to septic tanks have been identified.

Cumulative Impacts

The Proposed Project's impacts in conjunction with the Related Projects related to geology and soils would be less than significant. For similar reasons, the same finding is made as to Alternative 4. Geotechnical impacts related to the Related Projects in the development area would involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. The impacts on each site would be specific to that site and its users and would not be common or contribute to (or shared with, in an additive sense) the impacts on other sites. Thus, neither Alternative 4 nor the Project, together with the Related Projects would create an impact that is cumulatively considerable.

None of the cumulative projects has elements or activities that would cause or accelerate geologic hazards off-site that would contribute to increased geological hazards on the Project Site. In addition, the design and construction of the Project, Alternative 4 and the cumulative projects shall conform to the Uniform Building Code seismic standards as approved by the Department of Building and Safety. In addition, development on each site would be subject to uniform site development and construction standards that are designed to protect public safety, which includes a geotechnical report. Therefore, incremental impacts related to geology and soils would not be cumulatively considerable. Alternative 4's impacts would be substantially similar and therefore would not be cumulatively considerable.

No mitigation measures are required because no significant cumulative impacts related to geology and soil have been identified.

Greenhouse Gas Emissions

Under CEQA's Guidelines, as amended in 2010, a project could have a significant impact related to greenhouse gases ("GHGs") if it would: (1) generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or (2) conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

CEQA Guidelines section 15064.4 also assists lead agencies in determining the significance of the impacts of GHGs. That section states that lead agencies shall have discretion to determine, in the context of a particular project, whether: (1) to use a model or methodology to quantify a project's greenhouse gas emissions; and/or (2) to rely on a qualitative analysis or performance based standards. Section 15064.4 further states that a lead agency should consider specific factors, among others, when assessing the significance of GHG emission on the environment, including: (a) the extent to which the project may increase or reduce GHG emissions as comparted to the existing environmental setting; (b) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and (c) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHGs. CEQA Guidelines section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds.

Under CEQA, the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impacts. Although GHG emissions can be quantified, neither CARB, nor SCAQMD, nor the City of Los Angeles has adopted a quantitative significance threshold for GHG emissions that would be applicable to the Project. Per CEQA Guidelines section 15064(h)(3), a project's incremental contribution to a cumulative impact can be considered not to be cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative impact within the geographic area of the project. Therefore, CEQA Guidelines section 15064(h)(3) allows a lead agency to make a finding of less than significant for GHG emissions if a project complies with program and/or other regulatory schemes designed to reduce GHG emissions.

In the absence of any adopted, numeric threshold, the City evaluated the significance of the Project's potential GHG emissions consistent with CEQA Guidelines section 15064.4(b)(2) by considering whether the Project complies with applicable regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction of mitigation of greenhouse gas emissions.

The City recognizes that the state's AB 32 Scoping Plan, which calls for a return to 1990 levels of GHG emissions by 2020, represents the most significant statewide plan for reducing GHG emissions. Demonstrating consistency with AB 32 Statewide targets is considered to be conservative, as other plans are less aggressive.

The California Environmental Protection Agency updated the AB 32 Scoping Plan in May 2014 in a document called the "First Update to the Climate Change Scoping Plan" ("2014 Scoping Plan Update"). The 2014 Scoping Plan Update forecasts that the state's CO2e emission inventory in 2020 will be approximately 509 million metric tons. This estimate incorporates growth forecasts for population, housing, and jobs, along with growth in emissions from the range of industries that produce greenhouse gas emissions. However, the estimate does not assume implementation of AB 32 and SB 375-related programs.

Goals and targets within the 2014 Scoping Plan Update call for a 15.3 percent reduction in 2020 forecasts emissions from 509 to 431 million metric tons of CO2e emissions. These reductions are necessary to achieve the state's objective of ensuring that 2020 emissions meet the 1990

statewide levels. These reductions are to come from a variety of sectors, including energy, transportation, high-global warming potential sources, waste, and the state's cap-and-trade emissions program. In the energy sector, the recommended actions include reducing the state's electric and energy utility emissions, reducing emissions from large industrial facilities, controlling fugitive emissions from oil and gas producing, and reducing leaks from industrial facilities. In the transportation sector, the recommended actions include implementing phase 2 heavy-duty truck GHG standards, the zero-vehicle emission action plan for trucks, constructing the High Speed rail system from San Francisco to Los Angeles, coordinating land use planning, and implementing a sustainable freight strategy. With respect to high global warming potential sources, the recommended actions include reducing the high global warming potential compounds from refrigeration, air conditioning, and aerosols. In the waste sector, the recommended actions include eliminating disposal of organic materials at landfills, developing in-state infrastructure, addressing challenges with composting and anaerobic digestion, and implementing additional methane control at landfills. With respect to the cap-and-trade emissions program, the recommended actions include reducing emissions from regulated entities through performance-based targets.

Under the 2014 Scoping Plan Update, nearly all of the reductions are to come from sources that are controlled at the statewide level by state agencies, including the Air Resources Board, Public Utilities Commission, High Speed Rail Authority, and California Energy Commission. The few actions that are directly or indirectly associated with local government control are in the transportation sector, which is charged with reducing 4.5% of baseline 2020 emissions. Of those recommended actions to reduce emissions in the transportation sector, the 2014 Scoping Plan Update specifically identifies local and governments as the responsible agency for one action — reducing GHG emissions through coordinated planning.

On April 6, 2016, the Southern California Association of Governments ("SCAG") adopted its 2016-2040 RTP/SCS update, calling for a continuation of integrated planning for land use and transportation that will help achieve the state's goal of reducing per capita GHG emissions by eight percent by 2020 compared to 2005 levels, by 18 percent by 2035, and 21 percent by 2040. The Plan calls for public transportation improvements that will reduce GHG emissions per household by up to 30 percent, one percent reduction in GHG from having zero emission vehicles, neighborhood vehicles, and carsharing/ridesourcing make up two percent of the vehicle fleet by 2040.

Project Construction and Operation

The Proposed Project's construction and operation would not cause significant impacts with respect to GHG emissions. Alternative 4 would also have less than significant impacts. The Project's construction would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. Since there are no defined thresholds of significance for temporary emission of GHGs, construction emissions are considered as part of the long-term GHG impacts of the Proposed Project.

As one approach to gauging the significance of the Proposed Project's emissions, the Project's GHG emissions were compared to the Project in the absence of any GHG reduction measures (i.e., the No Action Taken ("NAT") Scenario. This approach mirrors the concepts used in the CARB's Climate Change Scoping Plan for the implementation of AB 32. This methodology is used to analyze consistency with applicable GHG reduction plans and policies and demonstrate the efficacy of the measures contained therein, but it is not a threshold of significance.

The NAT scenario is used to establish a comparison with project-generated GHG emissions. The NAT scenario does not consider site-specific conditions, project design features, or

prescribed mitigation measures. The net emissions for the Project and its associated CARB 2020 NAT scenario are estimated to be 11,369 and 17,398 MTCO2e per year, respectively, which shows the Project will reduce emissions by 33 percent from the CARB 2020 NAT scenario, through Project Design Features, the Project's design, sustainability, site, and land use characteristics, combined with compliance with regulatory requirements.

The proposed emissions would represent a net 5,496 metric ton reduction in annual emissions from the NAT scenario when accounting for existing emissions from current development. Based on these results, the Project is consistent with the reduction target as a numeric threshold (15.3 percent) set forth in the 2014 Revised AB 32 Scoping Plan. This analysis discloses potential emissions under both scenario and uses the 2014 Revised AB 32 Scoping Plan's statewide goals as one approach to evaluate the Project's impact.

Note that much of the vehicle-generated CO2 emissions attributed to the Project are attributable to vehicles at an existing location moving to the Project Site, and not from new vehicle emissions sources relative to global climate change. Therefore, although it is not possible to calculate the net contribution of vehicle-generated CO2, CH4, and N2O emissions from the Proposed Project (i.e., Project generated emissions minus current emissions from vehicles that would move to the Project Site), the net contribution would likely be much less than the estimated emissions.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project. Executive Orders S-3-05 and B-30-15, the AB 32 scoping Plan, SCAG's Sustainable Communities Strategy, and the City of Los Angeles's plans and policies all apply to the Project and are intended to reduce GHG emissions, and support statewide targets set in AB 32.

The Project would be consistent with the state's Executive Orders S-3-05 and B-30-15, which are orders from the Executive Branch for the purpose of reducing GHG emissions. These strategies call for developing more efficient land-use patterns to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. The Project includes elements of smart land use as it is located in an urban infill area that is well served by transportation infrastructure, including public transit provided by Metro. The Project's post-2020 emissions trajectory are expected to follow a declining trend, consistent with the 2030 and 2050 targets and Executive Order S-3-05 and B-30-15.

The Project would also be consistent with all feasible and applicable actions and strategies recommended in the AB 32 Scoping Plan (summarized in Table 4.E-5 of the Draft EIR). For example, the Project will also comply with the applicable provisions of the California Green Building Standards, which offer enhanced windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses. The Project will also be consistent with the applicable strategies for energy emissions sources, including utilizing a utility provider with goals to comply with the state's renewable portfolio standard program for a certain percentage of energy received and generated to be from eligible renewable energy sources. Both construction and operational activities from the Project site would generate transportation-related emissions from combustion of fossil fuels that are covered in the state's Cap and Trade program.

The Project would also be consistent with the applicable goals and principles set forth in the 2012–2035 RTP/SCS and the Compass Growth Vision Report. Therefore, the Project would be consistent with the GHG reduction related actions and strategies contained in the 2012–2035 RTP/SCS (summarized in Table.E-6 of the Draft EIR). Further, the inclusion of electric vehicle

charging infrastructure (see Project Design Feature GHG-PDF-1) will support the penetration of electric zero-emission vehicles into the vehicle fleet.

The Proposed Project is an infill development that is also consistent with all applicable actions and strategies in the 2016 RTP/SCS and its focus on integrated land use planning (summarized in Table.E-7). As a land use development project, 2016-2040 RTP/SCS is a directly applicable adopted regulatory plan to reduce GHG emissions. Specifically, the site's location near substantial local transit bus services, and within one-quarter mile of a Metro Red Line station places it in a High Quality Transit Area (HQTA). The 2016 RTP/SCS projects that these areas, while comprising only three percent of land area in the region make up 46 percent of future household growth and 55 percent of future job growth. Further, the vertical integration of land uses on the site will produce substantial reductions in auto mode share to and from the site that will help the region accommodate growth and promote public transit ridership that minimizes GHG emission increases and reduces per capita emissions consistent with the RTP/SCS. As an urban infill development that would promote per capita reductions in vehicle travel, the Project is also consistent with SCAG's 2016-2040 RTP goal of reducing per capita VMT by 7.4 percent over time. The Project would also be consistent with the applicable goals and principles set forth in the 2016-2040 RTP/SCS and the Compass Growth Vision Report. Therefore, the Project would be consistent with the GHG reduction related actions and strategies contained in the 2016-2040 RTP/SCS.

With respect to the City of Los Angeles plans and policies, construction of the Proposed Project is consistent with the "ClimateLA" plan's goal of reducing or recycling 70 percent of trash (including construction waste) by 2015. The Project is also consistent with the Plan's focus on reducing emissions from private vehicle use. The mixed-use nature of the Project is consistent with the Plan's land use policies that promote high density near transportation, transit-oriented development, and making underutilized land available for housing and mixed-use development, especially when near transit. The Project would also comply with the City of Los Angeles' Green Building Ordinance standards that would reduce emissions beyond a NAT scenario, and are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the State's codes.

Therefore, the Project's impacts on GHG emissions would be less than significant.

Alternative 4 would produce about 3,087 fewer metric tons of CO2e per year compared to the Project. Alternative 4 would also be consistent with all the plans, regulations and orders described above. Therefore, Alternative 4 would not cause a significant impact due to GHG emissions.

No mitigation measures are required, as the Project or Alternative 4 will have a less than significant impact related to GHG emissions. With implementation of Project Design Features, the Project's design, sustainability, site, and land use characteristics, combined with compliance with regulatory requirements, impacts related to GHG emissions would be less than significant. Those designs, features, and reductions are ensured through the conditions of approval for the Project's entitlements and through Section 4, Mitigation Monitoring Program, of the Final EIR. In addition, regulatory processes are in place to ensure compliance with other regulatory requirements. The following Project Design Feature will also be implemented to ensure that the Project's and Alternative 4's impacts to GHG emissions are less than significant.

Project Design Feature

GHG-PDF-1 – The Project would encourage carpooling and the use of electric vehicles by providing that at least 20 percent of the total code-required parking spaces provided for all types of parking facilities, but in no case less than one location, shall be capable of supporting future

electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20 percent results in a fractional space, round up to the next whole number. A label stating "EV CAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

At least five percent of the total code-required parking spaces shall be equipped with EV charging stations. Plans shall indicate the proposed type and location(s) of charging stations. Plan design shall be based on Level 2 or greater EVSE at its maximum operating capacity. When the application of the five percent requirement results in a fractional space, round up to the next whole number.

Alternative 4 would incorporate the same Project Design Features.

Cumulative Impacts

The Proposed Project, in conjunction with the Related Projects, would not result in significant cumulative GHG emissions impacts. Alternative 4 would also not result in significant cumulative impacts with respect to GHG emissions.

Given the global nature of GHG emissions, the analysis of GHG emissions is by its nature a cumulative impacts analysis. The City's analysis of the Project's GHG impacts accounted for the Project's potential to contribute to the cumulative impact of global climate change. The Project would be consistent with a number of relevant plans and policies that govern climate change. For example, the Project is consistent with the State's Executive Order S-3-05, which calls for reducing GHG emissions statewide to 1990 levels, including 15 percent reductions by 2020. The Project is also consistent with SCAG's RTP/SCS, which calls for regional growth and transportation emissions to be consistent with regional and state air pollution objectives. The 2016-2040 RTP/SCS is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. The Project would also comply with the City's Green Building Ordinance standards that reduce emissions beyond a "business-as-usual" scenario. Finally, as discussed further above, the Project would be consistent with and will help achieve all feasible and applicable strategies as recommended in the AB 32 Scoping Plan, which provides the basis for policies that will reduce cumulative GHG emission within California to 1990 levels by 2020. As a result, the Project's cumulative impact on climate change is considered less than significant. Since Alternative 4 is also consistent with the above plans, codes and orders, its cumulative impact on climate change is less than significant.

No mitigation measures are required, as no significant cumulative impacts associated with GHG emissions impacts have been identified.

Hazards and Hazardous Materials

Under CEQA's Guidelines, a project could have a potentially significant impact on hazards and hazardous materials if it would result in one or more of the following: (a) create a significant hazards 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 emission 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 include on a list of hazardous materials sites; (e) the project would result in a safety hazard for people residing or working in the project area for a project located within an airport land use plan, or where such plan has not been adopted, within two miles of a public airport; (f) for a project located within the vicinity of a private airstrip, if the project would result in a safety hazard for people residing or working the project area; (g) impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and (h) expose people or structures to a significant risk of loss, injury or death involving wildland fires.

The L.A. CEQA Thresholds Guide requires the hazardous analysis to address (1) risk of upset/emergency preparedness and (2) human health hazard.

Transport, Use, or Disposal of Hazardous Materials

The Proposed Project will not result in significant impacts related to the transport, use, or disposal of hazardous materials. Alternative 4 would also not result in any significant impacts. The Project's construction would involve the temporary transport, use, or disposal of potentially hazardous materials, including paints, adhesives, surface coatings, cleaning agents, fuels, and oils. All of those materials would only be used in a short-term nature during construction activities. All potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which would ensure that impacts would be less than significant. Any emission from the use of such materials would be minimal and localized to the Project Site. Since the Project's construction would comply with applicable regulations and would not expose persons to substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards, no impacts associated with the potential release of hazardous substances during the Project's construction would occur.

The Project's operation would include the development of live work, office, retail, restaurant, and cultural uses that would involve the limited use of hazardous materials. Operation of the residential uses would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, paints, and pesticides for landscaping. Hazardous materials to be used, stored, and disposed of by the Project's commercial uses would vary depending on the commercial use but could include cleaning solvents, waxes, dyes, toners, paints, bleach, grease, and petroleum products. With implementation of hazardous waste reduction efforts on-site (i.e., the City's Green Building Ordinance and through source reduction, recycling, on-site treatment, etc.) as well as the proper treatment and disposal of such wastes at licensed resource recovery facilities, the Project would not generate significant amounts of hazardous wastes.

The transport of any hazardous materials and wastes during the Project's operation would occur in accordance with federal and state regulations, including the Resource Conservation and Recovery Act ("RCRA"), Title 49 of the Code of Federal Regulations, the California Vehicle Code, and the California Health and Safety Code. In accordance with those regulations, the transport of hazardous materials and wastes would only occur with transporters who have received training and appropriate licensing, and hazardous waste transporters would be required to complete and carry hazardous waste manifests. As a result, there would be no significant impact to the transport of hazardous materials.

During the Project's operation, hazardous waste releases through use or disposal may result in potential injury if exposure takes place, and, if not mitigated, result in soil and/or groundwater impacts. Compliance with applicable City, state, and federal regulations related to the handling, storage and disposal of hazardous waste would ensure that such impacts would be less than

significant. Additionally, implementation of the Project could incrementally decrease the transport of hazardous materials and waste to/from the Project Site when compared to existing conditions, since the existing auto-related service uses would not be included as part of the Project.

Overall, with compliance with federal, state, and local regulations, the transport of hazardous materials and wastes during Project construction and operation would not create a hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials consistent with existing regulatory framework. The same is true for Alternative 4.

No mitigation measures are required, as no significant impacts associated with the transport, use or handling of hazardous materials have been identified.

Upset Conditions Involving the Release of Hazardous Materials

The Project's impacts from upsetting conditions involving the release of hazardous materials would be less than significant. Alternative 4 would also not result in significant impacts. The structures on the Project Site were constructed in 1988. Therefore, no Asbestos-Containing Materials are presumed to exist on-site and the Project would have no impact with respect to ACMs. The structures on the Project Site were constructed in 1988. Therefore, no Lead-Based Paint is presumed to exist on-site and the Project would have no impact with respect to LBP. There is one transformer located on-site, which appears to be in good condition with no visible signs of hazardous material spills or leaks. As no staining or indications of releases were noted relative to the transformer, impacts related to Polychlorinated Biphenyls would be less than significant. No storage tanks or containers are known to exist on the Project Site. Therefore, impacts related to on-site storage of hazardous materials would be less than significant. The same is true for Alternative 4.

No mitigation measures are required, since no significant impacts associated have been identified.

Emergency Response Plan or Emergency Evacuation Plan

The Proposed Project's construction and operation would not lead to significant impacts related to an emergency response plan or evacuation plan. Similarly, Alternative 4 would not lead to significant impacts. The removal of the existing on-site buildings and the construction of the Project would occur within the property boundaries of the Project Site. Temporary pedestrian or vehicular public right-of-way closures may be necessary during the construction phase for construction staging, equipment access, and pedestrian safety. In particular, partial lane closures would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if partial closures to streets surrounding the Project Site become necessary, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete. As such, the construction of the Project would not substantially impede public access, travel upon a public right-of-way, or interfere with an adopted emergency response or evacuation plan, and impacts would be less than significant.

The Project would include live/work, office, retail, restaurant, and cultural land uses and would be required to establish, implement, and maintain on file an emergency response plan, which would be inspected annually by the LAFD. As part of this emergency response plan, evacuation signs would be located in every elevator lobby above and below ground, in other conspicuous floor locations, and in each office area and restaurant, as required by Code. All emergency plans, procedures, and evacuation signs would be submitted to the LAFD for inspection and approval prior to their implementation and would be properly maintained.

The Project's operation would include retail, restaurant, office, and residential land uses and would be required to establish, implement, and maintain on file an emergency response plan. The Los Angeles Fire Department would inspect the emergency response plan annually, which would require that evacuation signs be located in every elevator lobby above and below ground, in other conspicuous floor locations, and in each office and restaurant area as required by Code. Existing regulations require that all emergency plans, procedures, and evacuation signs would be submitted to the Los Angeles Fire Department for inspection and approval prior to their implementation and would be properly maintained. In sum, the Project's construction would not substantially impede public access, travel upon a public right-of-way, or interfere with an adopted emergency response or evacuation plan, and impacts would be less than significant.

Since Alternative 4 would comply with the same codes and regulations and be built and operated similar to the Project as described in this finding, Alternative 4 would not cause any significant impacts in this area.

No mitigation measures are required because no significant impacts associated with emergency response plans or emergency evacuation plans have been identified.

Release of Hazardous Materials Within One-Quarter Mile of Schools

The Project's operation would at most involve minimal amounts of hazardous materials, and structures and roadways currently act as a buffer between the Project Site and the two schools located within 0.25 miles of the Project Site. Impacts would be less than significant. Alternative 4, which would be constructed on the same Site, would also have less than significant impacts.

The Project Site is located within 0.25 miles of two schools: Korpus School of Art and Gallery, 1300 Factory Place (700 feet southwest); Southern California Institute of Architecture, 960 E. 3rd Street (900 feet north).While the Project would be operational during school hours, the Project would use, at most, minimal amounts of hazardous materials for routine cleaning and maintenance. There are also intervening structures and roadways between the schools and the Project Site. Therefore, the Project would not pose a significant risk involving the routine transport, use, and disposal of hazardous materials or the accidental release of hazardous materials, and impacts associated with the emission of hazardous materials near an existing or proposed school would be less than significant. For the same reasons, Alternative 4 would also have less than significant impact.

No mitigation measures are required, as no significant impacts associated with the release of hazardous materials within 0.25 miles of existing or proposed schools have been identified.

Listed Hazardous Materials Sites

The risk of environmental contamination affecting the Project Site from surrounding land uses is minimal and thus no significant impacts would occur. For the same reasons, Alternative 4 would also not cause any such impacts. As part of the Phase I ESA, a review was performed of reported environmental conditions within ASTM-recommended search distances of the Site. The report identified a number of facilities within the specified search radii from the Site which are listed on governmental databases. A review of these facilities determined that none of the identified facilities presents an environmental concern to the Project Site due to its distance from the Project Site, down-gradient or cross-gradient position with respect to the site, and/or the nature of the environmental conditions at the facilities. Based upon the information obtained through interview and observations as part of the Phase I ESA, the risk of the site being affected by an environmental impact from surrounding land uses is minimal, and as such, no significant impact would occur. Implementation of Mitigation Measure HAZ-MM-1 below would ensure that

any soil contaminants present on-site would be handled in accordance with applicable regulations.

No mitigation measures are required as no significant impacts associated with listed hazardous materials sites have been identified.

Airport Land Use Plan, Or Two Miles Of A Public Airport Or Vicinity Of Private Airstrip

The Proposed Project is not within two miles of a public airport or within the vicinity of a private airstrip. Therefore, neither Alternative 4 nor the Project would have significant impacts related to an airport land use plan or nearby public airports or private airstrips. A project may have a significant impact if a project is located within two miles of a public airport, and subject to a safety hazard or within the vicinity of a private airstrip. The Project Site is also not located within two miles of public airport and is not in the vicinity of a private airstrip. Therefore, no significant impacts would occur under the Project or Alternative 4.

No mitigation measures are required, as no significant impacts associated with a public or public use airport have been identified.

Wildland Fires

The Project Site is not located in proximity to wildland areas and does not pose a potential fire hazard. Therefore, neither the Proposed Project nor Alternative 4 would cause any significant impacts related to wildland fires.

A project may have a significant impact related to wildland fires if the project is located in proximity to wildland areas and poses a potential fire hazard, which would affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone as identified through the City's ZIMAS Parcel Profile Report. The project Site is also not located within a designated Fire Buffer Zone or Mountain Fire District as identified in the Safety Element of the City's 1996 General Plan. Therefore, no significant impact would occur under the Project or Alternative 4.

No mitigation measures are required, as no significant impacts associated with wildland fires have been identified.

Cumulative Impacts

Neither Alternative 4 nor the Proposed Project, in conjunction with the Related Projects, would result in a significant cumulative impact related to hazards and hazardous materials. The City considered the cumulative growth in the Project area, including the known development projects on the Related Projects list as well as the general ambient growth projected to occur. Some of this growth is anticipated to occur on or around properties in the Project area known to contain hazardous or potentially hazardous conditions, such as hazardous waste generation or handling, or the presence of leaking underground storage tanks. While impacts associated with hazards and hazardous materials are typically site-specific and do not cumulatively affect off-site areas, conditions such as contaminated groundwater can affect down-gradient properties. In addition, operation of many of the cumulative projects can reasonably be expected to involve the limited use of potentially hazardous materials typical of those used in residential and commercial developments, including cleaning agents, paints, pesticides, and other materials used for landscaping. Further, some of the cumulative projects propose manufacturing, industrial, and warehouse uses that may also utilize, handle, store, or generate hazardous materials. However, regardless of the number and location of the Related Projects, neither

Alternative 4 nor the Project, together with the Related Project would create an impact that is cumulatively considerable. Each development project would have to comply with site specific development standards and state hazardous materials handling and transporting regulations. Compliance with these standards would ensure that the related projects would further the objectives of applicable community and regional plans. Therefore, neither Alternative 4 nor the Project's cumulative impacts related to hazards and hazardous materials would be significant.

No mitigation measures are required, as no significant cumulative impacts associated with hazards and hazardous materials have been identified.

Hydrology and Water Quality

Under the CEQA Guidelines, a project may have a significant impact if the project would result in one or more of the following: (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; (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 offsite; (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; or (j) expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow.

Under the City's CEQA Thresholds Guide, the hydrology analysis must address: (1) surface water hydrology; and (2) groundwater level.

Water Quality

The Proposed Project would not violate any water quality standards, waste discharge requirements, or otherwise substantially degrade water quality. The impact would be less than significant. For the same reasons, Alternative 4's impacts would be less than significant.

Runoff from the Project Site does not directly discharge into Los Angeles River (or any other water body). Accordingly, runoff from the Project Site is considered a non-point source discharge for potential pollutants. Thus, the Proposed Project would not result in any impacts related to point-source discharge that could violate water quality standards.

The Project Site is nearly 100 percent impervious. Some existing undeveloped areas of the Project Site, including the paved parking areas and small areas of vegetation, would be replaced by new buildings and surfaces. The Project Site would be required to obtain a National Pollutant Discharge Elimination System ("NPDES") water quality permit from the Los Angeles Regional Water Quality Control Board. Implementation of appropriate project design features and compliance with local, state, and federal regulations, code requirements, and permit provisions would prevent both short term (construction) and long-term (operational) impacts to water quality.

During the Project's construction, sediment is usually the constituent of greatest potential concern, especially for construction activities during wet weather periods. The greatest risk of soil erosion during the construction phase occurs when the site disturbance peaks due to grading activity and removal and re-compaction or replacement of fill areas. Other pollutants that could affect surface-water quality during the Project construction phase include petroleum products (gasoline, diesel, kerosene, oil, and grease), hydrocarbons from asphalt paving, paints and solvents, detergents, fertilizers, and pesticides (including insecticides, fungicides, herbicides, and rodenticides). The Project Applicant would comply with the applicable requirements of the City's Building Code, which requires wet weather erosion control measures for construction during the rainy season.

To further minimize potential water quality impacts during the construction phase, the Project Applicant would be required to prepare and implement a Stormwater Pollution Prevention Plan ("SWPPP") in accordance with the NPDES General Permit for Discharges of Stormwater Associated with Construction Activity and Land Disturbance Activities. The SWPPP would include Best Management Practices ("BMPs") and erosion control measures to prevent pollution and avoid creating substantial additional sources of polluted runoff in storm water discharges during construction. The SWPPP would be subject to review and approval by the City for compliance with the City's Best Management Practices Handbook. All Project construction activities must also comply with the City's grading, excavation, and fill regulations, which require the implementation of grading and dust control measures. Since the Project's construction would disturb more than one acre of land, the Project Applicant would also be required to obtain coverage under the General Construction Activity Storm Water Permit ("GCASP"), which requires development and implementation of a SWPPP. Construction projects that include grading during the rainy season must also develop a Wet Weather Erosion Control Plan ("WWECP"). Through compliance with NPDES requirements and City Grading regulations, Project impacts related to water quality during construction would be less than significant.

With respect to the Project's operation, the Project's urban runoff could include the contaminants typically associated with urban development, including trace metals from pavement runoff and landscape maintenance debris that may be mobilized in storm runoff from driveway areas and landscaping, and in dry-season "nuisance flows" from landscape irrigation. Under the existing conditions, storm water runoff from the Project Site contains similar types of urban pollutants and is currently uncontrolled and under treated. Under the post-Project conditions, in accordance with NPDES requirements, the Project Applicant would be required to have a Project-specific storm water quality plan in place during the operational life of the Project to address the management of urban runoff from the Project Site. The storm water quality plan would include site design, source control, low-impact development, and treatment control BMPs. Final selection of BMPs in the plan would be coordinated with the City. The storm water quality plan would also be subject to the City's review and approval for compliance with the City's Development Best management Practices Handbook, Part B, Planning Activities. Given that the Project Site likely does not currently meet water quality standards because of the site's current uses, the quality of storm water drainage would likely improve at the Project Site with the Project's development. In sum, implementation of the storm water quality plan, and overall compliance with NPDES requirements would ensure that the Project's water quality impacts during operation would be less than significant. Since Alternative 4 would be built on the same site and comply with the same regulations, Alternative 4's impacts to water quality would be less than significant.

No mitigation measures are required, as no significant impacts associated with water quality have been identified.

Groundwater

Neither Alternative 4 nor the Proposed Project would 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. Therefore, no significant impact would occur.

Since the Project Site is nearly completely impervious, there is limited to no groundwater recharge currently occurring on the Project Site. The Project would not substantially change the impervious surface of the Project Site. Construction of the Project is not anticipated to require temporary dewatering for the approximately 36-foot deep excavations that would be required for the below-grade parking levels. Groundwater levels in the vicinity are noted to be approximately 100 feet below ground surface; thus, excavations for the Project would not be expected to encounter groundwater. However, if unanticipated groundwater is encountered during Project excavation work, the Project Applicant would be required to comply with the terms of Order No. R4-2013-0095, NPDES No. CAG994004 governing construction-related dewatering discharges. The Project will also be served by the municipal water and sewer system and no production wells as a water source would be installed. The Project would also not substantially deplete groundwater supplies or interfere substantially with groundwater recharge, yields, or flow directions. Therefore, no impacts to groundwater would occur. Since Alternative 4 would be constructed on the same Project Site and comply with the same regulations, its impacts would be similar and less than significant.

No mitigation measures are required, as no significant impacts associated with groundwater have been identified.

Drainage

Neither Alternative 4 nor the Proposed Project would substantially alter the existing drainage pattern of the Project Site or area that would result in substantial erosion or siltation on- or off-site. Therefore, no significant impact would occur.

The Project Site does not contain any water features, streams, or rivers. Similarly, runoff from the Project Site discharges to the local existing storm drain infrastructure and does no directly discharge to a stream or river. The Project would not alter the course of any stream or river. The Project would alter the on-site drainage patterns due to the development of buildings, podiums, and open space areas that would modify the elevations of the Project Site. However, this alteration would not result in on-site erosion or siltation because all runoff would be directed to areas of BMPs and/or storm drain infrastructure. The current drainage pattern from the Project Site includes the discharge of storm water runoff from the paved areas directly to the sidewalk and street via surface flow. The Project would not substantially alter the existing drainage pattern of the surrounding area in a manner that would result in substantial flooding on- or off-site. Therefore, no impacts related to drainage would occur. For the same reasons, Alternative 4's impacts to drainage would be substantially similar and less than significant.

No mitigation measures are required, as no significant impacts associated drainage have been identified.

Runoff

Neither Alternative 4 nor the Proposed Project would create or contribute to runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. Through compliance with existing regulations governing stormwater management, the impact would be less than significant.

A significant impact may occur if a project would increase the volume of storm water runoff to a level that exceeds the capacity of the storm drain system serving a Project Site. A Project-related significant adverse effect would also occur if a project would substantially increase the probability that polluted runoff would reach storm drains. There are three general sources of potential short-term construction-related storm water pollution association with the Project: (1) the handling, storage, and disposal of construction materials containing pollutants; (2) the maintenance and operation of construction equipment; and (3) earth-moving activities which, when not controlled, may generate soil erosion and the transportation of pollutants via storm runoff or mechanical equipment. Earth-moving activities that can greatly increase erosion processes are another source of stormwater pollution contamination. Generally, routine safety precautions for handling and storing construction materials can effectively mitigate the potential pollution of stormwater by these materials. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed, including applying water or other dust palliatives as necessary and reducing runoff into the storm drains through temporary diversions and barriers. Second, the area should be secured to control off-site migration of pollutants. These BMPs are part of existing regulatory requirements. When properly designed and implemented, these "good-housekeeping" practices would reduce short-term construction-related impacts to a less than significant level by controlling dust and erosion that may occur onsite and leaks from any construction equipment. The Project is also required to comply with the City's Low Impact Development BMPs, which are determined on a case by case basis by the Department of Public Works. Approval for development project and building/grading permits would not be granted or issued until appropriate and applicable stormwater BMPs are incorporated into the Project design plans.

With respect to the Project's operation, the Project would generate substances that could degrade the quality of water runoff. For example, chemical deposits by cars in the parking area could have the potential to contribute to metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, impacts to water quality would be reduced, as the Project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles and State Water Resources Control Board. Design criteria would also be incorporated into the Project to minimize the off-site conveyance of pollutants. Compliance with existing regulations would ensure that water quality impacts remain less than significant.

The Project is required to comply with the NPDES program as well as the requirements set forth in the LAMC. These regulations control water pollution by regulating point sources that discharge pollutants. Therefore, through compliance with existing regulations, the Project's impacts to runoff would be less than significant. Since Alternative 4 would be constructed and operated on the same site and comply with the same regulations, Alternative 4's impacts concerning runoff would be substantially similar and less than significant.

No mitigation measures are required, as no significant impacts related to runoff have been identified.

Place Housing Or Structure Within A 100-Year Flood Hazard Area

Neither Alternative 4 nor the Proposed Project would not 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. Therefore, no significant impact would occur.

The Project Site is not located within an area identified by the Federal Emergency Management Agency ("FEMA") as potentially subject to 100-year floods. The Project Site is not located within a City-designated 100-year or 500-year flood plain. The Project would not introduce people or

structures to an area of high flood risk. Therefore, the project would not contain any significant risks of flooding and would not have the potential to impede or redirect floodwater flows, and no impact would occur. Because Alternative 4 would be constructed on the same site, the impacts would be the same and less than significant.

No mitigation measures are required, as no impacts associated with placing housing within a 100-year flood hazard area have been identified.

Flooding, Including From Failure Of A Levee or Dam

Neither Alternative 4 nor the Proposed Project would expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of a failure of a levee or dam. Therefore, the impact would be less than significant.

The Project Site is located approximately 600 feet west of the Los Angeles River, which is contained in a flood control channel. The Project Site is within the City-designated potential inundation area of Los Angeles River flood control channel, as is much of Downtown and Central Los Angeles. The Project Site and the surrounding areas could be inundated with flood waters if the levees along the Los Angeles River channel were to fail, which is a remote possibility. According to the City of Los Angeles Safety Element, dams and reservoirs are monitored during storms and measures are instituted in the event of potential overflow. These measures apply to facilities within the City's borders and facilities owned and operated by the City within other jurisdictions. The Safety Element recognizes that inundation due to water storage facility failure is a potential hazard. However, the Baldwin Hills dam failure of December 14, 1963 and near collapse of the Van Norman Dam during the 1971 San Fernando earthquake resulted in strengthening of the federal, state and local design standards and retrofitting of existing facilities. No dams or reservoirs are located within the Project Site area. The Los Angeles River flood control channel is maintained by the U.S. Army Corps of Engineers (USACE), which is responsible for periodically analyzing its facilities for earthquake safety and potential failures. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing channel and drainage infrastructure are intended to ensure that all such facilities are capable of withstanding the maximum credible earthquake for the site. Flooding from other sources is not expected; thus the minimal risk of flooding from potential levee failure would not be exacerbated by the development of the Project. Thus, the failure of the Los Angeles River flood control channel is considered remote and does not present a significant risk of loss, injury or death to people or structures. Therefore, no impact related to risk of loss involving inundation resulting from the failure of a levee or dam would occur. Because Alternative 4 would be constructed on the same site, the impacts would be the same and less than significant.

No mitigation measures are required, as no significant impacts associated with flooding as a result of a failure of a levee or a dam have been identified.

Inundation by Seiche, Tsunami, or Mudflow

No impact would occur related to inundation by seiche, tsunami, or mudflow for the Project or Alternative 4.

A significant impact may occur if a project is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami) or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. The Project Site is not located in a Tsunami Hazard Area as identified in the Safety Element of the City's General plan. The Project Site is also not located in a Tsunami Inundation Zone as identified in the City's ZIMAS

Parcel Profile Report, and is located approximately 14 miles inland from the Pacific Ocean and not near nay other major water bodies. Therefore, risks associated with seiches or tsunamis would be considered extremely low at the Project Site. The Site is also not in or near a hillside area that could become a mudflow. No impact would occur. Because Alternative 4 would be constructed on the same site, the impacts would be the same and less than significant.

No mitigation measures are required, as no significant impacts associated with inundation by seiche, tsunami, or mudflows have been identified.

Cumulative Impacts

Neither Alternative 4 nor the Proposed Project, in conjunction with the Related Projects, would not result in a cumulative hydrology, water quality, and groundwater impact. Both Alternative 4 and the Project would have a less than significant impact with respect to all hydrology and water quality issues and its associated incremental impacts are therefore not considered cumulatively considerable. The project would implement new BMPs that would control storm water runoff quantity and quality. Other Related Projects in the area would also be required to adhere to regulatory requirements that control storm water and pollutant discharges and would be required to prepare and implement a SWPPP and/or Standard Urban Stormwater Mitigation Plan ("SUSMP"). Compliance with these standards would ensure that the Related Projects would further the objectives of applicable regional water quality plans. Further, the Project Site and surrounding areas are serviced by an MS4 system that is designed with capacity to handle 50 year storm flows from all areas in the developed condition. While Alternative 4, the Project and Related Projects may change the onsite land uses, they would remain urban developments planned or by the existing MS4 system. Also, future development projects within the Project area are likely to be subject to more stringent BMPS than what are in use under the existing conditions, and generally improve existing stormwater flows that discharge from currently vacant parcels or surface parking lots. As such, cumulative impacts to hydrology and water quality would not be cumulatively considerable.

No mitigation measures are required, as no significant cumulative impacts associated with hydrology, water quality, and groundwater impact have been identified.

Land Use and Planning

Under CEQA's Guidelines, a project could have a potentially significant impact related to land use and planning if it were to: (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 adopted for the purpose of avoiding or mitigating an environmental effect; or (c) conflict with any applicable habitat conservation plan or natural community conservation plan.

Under the L.A. CEQA Thresholds Guide, a project's potential impacts related to land use and planning must be made on a case-by-case basis considering the project's consistency with applicable land use plans and compatibility with the type of land uses within the project area.

Physically Divide An Established Community

Neither Alternative 4 nor the Proposed Project would not physically divide an established community. Therefore, no significant impact would occur. A significant impact may occur if a project is sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. For example, a project could divide an established community if it involved a continuous right-of-way such as a roadway which would divide a community and impeded access between parts of the community. Neither Alternative 4 nor the

Project is of a size or type to physically divide a community. Therefore, no significant impact would occur.

No mitigation measures are required, as no significant impacts associated with dividing an established community have been identified.

Consistency With Applicable Land Use Plans, Policies, And Regulations

The Proposed Project would not 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. The impact would be less than significant. Similarly, Alternative 4 would not conflict with applicable plans and have less than significant impacts.

The legal standard that governs consistency determinations with applicable land use plans states that a project must only be in "harmony" with the applicable land use plan to be consistent with that plan. (See *Sequoyah Hills Homeowners Assn. v. City of Oakland* ("Sequoyah Hills") (1993) 23 Cal.App.4th 704, 717-18.) As the Court explained in *Sequoyah Hills,* "state law does not require an exact match between a proposed subdivision and the applicable general plan." (Id. at p. 717.) To be "consistent" with a general plan, a project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning, the project must be "in agreement or harmony with the applicable plan." (*Id.* at pp. 717-18; see also *Greenbaum v. City of Los Angeles* (1984) 153 Cal.App.3d 391, 406; *San Franciscans Upholding the Downtown Plan v. the City and County of San Francisco* (2002) 102 Cal.App.4th 656, 678.) Further, "[a]n action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment." (*Friends of Lagoon Valley v. City of Vacaville* (2007) 154 Cal.App.4th 807, 817.)

As explained in Section 4.H, Land Use and Planning, and Section 6, Alternatives, of the Draft EIR, both Alternative 4 and the Proposed Project will be consistent with the following applicable policies **and**/or regulations and, therefore, no significant land use impacts would occur:

1. *Southern California Association of Governments ("SCAG") Compass Blueprint Growth Vision/Compass Blueprint 2% Strategy Areas ("Compass Blueprint 2% Strategy).*

2. *SCAG Regional Comprehensive Plan*. Both Alternative 4 and the Project are consistent or partially consistent with applicable policies in the SCAG Regional Comprehensive Plan, including policies related to (i) land use and housing; (ii) open space and habitat; (iii) water; (iv) energy; and solid waste.

3. *SCAG Regional Transportation Plan/Sustainable Communities Strategy ("SCAG 2012-RTP/SCS").* The SCAG 2012-2035 RTP/SCS plans to concentrate future development and provide higher intensity development in proximity to transit hubs to reduce vehicle miles traveled and GHG emissions from personal vehicles. While the RTP/SCS focuses on transportation investments in the SCAG region, the Project and Alternative 4 would be consistent with the applicable 2016-2040 RTP/SCS policies.

4. *City of Los Angeles General Plan – Framework Element Land Use Policies.* The Project and Alternative 4 would be consistent with many of the applicable policies.

5. *City of Los Angeles General Plan – Health and Wellness Element.* The Project and Alternative 4 would be consistent with many of the applicable policies.

6. *City of Los Angeles General Plan – Housing Element.* The Project and Alternative 4 would be consistent with many of the applicable policies.

7. *Central City North Community Plan.* The Project Site is designated for Limited Manufacturing land uses. Since the Project would include a mix of live/work, office, cultural, and retail/restaurant uses, the Project would be inconsistent with the existing Heavy Manufacturing land use designation. Therefore, as part of the Project, the Applicant is seeking a General Plan Amendment to change the land use designation from Heavy Manufacturing to Regional Center Commercial. Of the 30 Community Plan policies that are applicable to the Project, the Project would be consistent with 26 policies and either inconsistent or partially consistent with the remaining four policies. Because state law does not require an exact match, the Project is sufficiently consistent with the Community Plan. Alternative 4 would be consistent with the same policies in the Community Plan.

8. *Central City North Community Plan – Design Policies*. The Project and Alternative 4 would implement and be consistent with the applicable Community Plan design policies, including the applicable commercial, multiple residential, and community design and landscaping policies.

9. *City of Los Angeles General Provisions and Zoning Code*. The Project Site is located in the M3 (Heavy Industrial) zone. The Project would include a mix of live/work, office, cultural, and retail/restaurant land uses that would be inconsistent with the existing M3 zoning for the Project Site, because of the proposed live/work uses. Therefore, as part of the Project, the Applicant is seeking a Zone Change from M3-1-RIO to C2-2-RIO, which would allow for the Project's proposed mix of uses. With respect to height and density limitations, with approval of the Project's requested entitlements, the Project's and Alternative 4's maximum height and FAR would be consistent with the zoning for the Project Site.

10. *Los Angeles River Improvement Overlay District*. Prior to issuance of a building permit, the Project Applicant would be required to consult with the Department of City Planning to obtain an Administrative Clearance for compliance with all of the applicable regulations of the Los Angeles River Improvement Overlay District. As such, the Project and Alternative 4 would be required to comply with the Los Angeles River Improvement Overlay District.

11. *Parking.* With approval of the requested ZAD, the Project and Alternative 4 would be designed and constructed to meet the Code required vehicular and bicycle parking spaces, and as such, no impact would occur with respect to parking.

12. *Walkability Checklist*. The Project and Alternative 4 would be consistent with all of the guidelines in the walkability checklist.

13. *Citywide Design Guidelines*. The Project and Alternative 4 would be consistent with most of the Citywide Design Guidelines.

14. *City of Los Angeles Do Real Planning Principles.* The Project and Alternative 4 are compatible with the applicable good-planning practices set forth in the City's Do Real Planning publication. The Project and Alternative 4 will be consistent with those principles as it would provide a live/work mixed-use development in close walking and biking proximity to the Little Tokyo/Arts District Metro Gold Line Station and in close proximity to existing bus lines and other commercial uses located in the Arts District. Further, the Project and Alternative 4 would incorporate sustainable building practices to

eliminate pollution and reduce waste. The Project and Alternative 4 would also provide approximately 78 short-term and 621 long-term bicycle parking spaces that would encourage alternative modes of transportation to and from the Project Site.

Thus, as set forth fully in the Draft EIR, the Project and Alternative 4 would be in agreement and harmony with applicable plans. Therefore, no mitigation measures are required, as no significant impacts associated with applicable land use plans, policies, or regulations have been identified.

Habitat Conservation Plan Or Natural Community Conservation Plan

Neither Alternative 4 nor the Project would conflict with a habitat conservation plan or natural community conservation plan. The Project Site has been previously developed and is located in an urbanized area. There is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that apply to the Project Site. Therefore, implementation of the Project and Alternative 4 would not conflict with any habitat conservation plans and no impacts would occur.

No mitigation measures are required, as no significant impacts associated with an applicable habitat conservation plan or natural community conservation plan have been identified.

Compatibility Analysis

The Project would be compatible with its surrounding environment. Therefore, no significant impact would occur. Alternative 4 would similarly cause no significant impacts.

The physical compatibility of the Project with its surrounding environs is based on an analysis of proposed uses and improvements and their potential for on- and off-site impacts. As described in the findings for those substantive areas elsewhere in this document, the Project is physically compatible with its environs. A project's functional compatibility is defined as the capacity for adjacent, yet dissimilar land uses to maintain and provide services, amenities, and/or environmental quality associated with such uses. Potentially significant functional land use compatibility impacts may be generated when a project hinders the functional patterns of use and relationships associated with existing land uses. While the Project would change the land use character of the Project Site by replacing the warehouse that exists on the Project Site, the Project would increase both the housing and employment opportunities in the area and would provide greater density near transit service. The Project is consistent with its surrounding community, the Arts District, because it will provide substantial employment opportunities and live/work units, consistent with the historical uses of the Arts District. Although the Project would alter the visual character of the Project area by removing the existing industrial building and redeveloping the Project site with a mixed-use building, this alteration in the visual character would not equate to a degradation. As explained in Section 4.B, Aesthetics, and Section 6, Alternatives, of the Draft EIR, neither the Project nor Alternative 4 would create significant impacts related to aesthetics. The pedestrian paseo and commercial uses along ground floor frontages are also consistent with the Arts District community, and are consistent with many policies set forth in the City's Walkability Checklist. Alternative 4's design with a taller live/work tower would be consistent with the surrounding community because it will be constructed away from street frontages, will reduce pedestrian-level massing, and will further facilitate access to ground-level uses, consistent with the Arts District's historical uses and the City's Walkability Checklist. Under the Project site's existing zoning (M3-1), which corresponds to height district 1, there is no existing height limit for the Project site. The new zoning requested for the Project site (C2-2D), which corresponds to height district 2, does not have any height limits. The Project would be limited, however, to a height of 370 feet through the "D" limitation under LAMC section 12.32-G. Therefore the Project and Alternative 4 would be consistent with the City's

development standards with respect to height. With implementation of mitigation, the Project's local construction emissions to below SCAQMD's significance thresholds, and would ensure that Project air quality impacts related to sensitive receptors would be less than significant. Mitigation would also reduce the noise levels associated with construction of the Project to the maximum extent that is technically feasible, and temporary and intermittent construction noise levels at the location of sensitive receptors near the Project Site would be less than significant. The Project will not hinder the functional patterns of use and relationships associated with the existing land uses. The Project and Alternative 4 would be in agreement and harmony with policies and objectives of the City's General Plan, including the Central City North Community Plan, as explained in Section 4.H, Land Use and Planning, and Section 6, Alternatives, of the Draft EIR. Thus, the Project and Alternative 4 would be substantially compatible with the surrounding land uses and impacts related to land use incompatibility would be less than significant.

No mitigation measures are required, as no significant impacts associated with compatibility have been identified.

Cumulative Impacts

Neither Alternative 4 nor the Proposed Project, in conjunction with the Related Projects, would not result in a significant cumulative land use impact.

Cumulative land use impacts could occur if the other Related Projects would result in incompatible land uses, or result in land uses that are inconsistent with adopted land use plans when combined with the impacts of the Project or Alternative 4. Given the build-out conditions of the greater Los Angeles region, including the Project area, cumulative development likely would convert existing underutilized properties in the Los Angeles area to revitalized higher-density development to respond to the need for housing, sources of employment, and associated retail land uses. Both Alternative 4 and the Project would implement important local and regional goals and policies for the Los Angeles area, which would assist the City in achieving short- and long-term planning goals and objectives. Likewise, future development associated with the Related Projects would support the furtherance of the build out of Los Angeles and the surrounding area. This is consistent with SCAG and other regional policies for promoting more intense land uses adjacent to transit stations and job centers, providing a variety of housing options, and increasing the number of retail and commercial uses. Further, all related projects in the City would be subject to the same local development and mitigation standards as the Projects. Therefore, neither Alternative 4 nor the Proposed Project would combine with any of the Related Projects to create a cumulatively significant land use impact and cumulative impacts.

No mitigation measures are required, as no significant cumulative impacts associated with land use have been identified.

Mineral Resources

The Proposed Project would cause no impacts to mineral resources. Similarly, Alternative 4 would cause no such impacts. Under the CEQA Guidelines, a project may have an impact to mineral resources if it will (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; or (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.

The Project Site is located within an area classified as MRZ-2, defined as areas where adequate information indicates that significant mineral deposits are present, or where it is

judged that a high likelihood exists for their presence. Although no oil wells exist or are known to have previously existed on or immediately adjacent to the Project Site, plugged wells do exist within a 1,500-foot radius of the site. The Project Site is not located within an Oil Drilling/Surface Mining Supplemental Use District. Should any future mineral resource be discovered on or near the Project Site, development of the Project would not preclude the mineral's extraction, nor would it alter the potential utility of any minerals located beneath the Site. Furthermore, the Project Site is developed and located in an urbanized area. Therefore, the Project would have no impact with respect to loss of availability of a known regionally-important mineral resource or locally-important mineral resource. Therefore, no impacts would occur. Because Alternative 4 would be constructed on the same Project Site, it would also not cause any impacts to mineral resources.

No mitigation measures are required because no significant impacts related to mineral resources have been identified.

Noise

Under CEQA's Guidelines (Appendix G), a project would have a significant impact on noise if it would cause any of the following conditions to occur: (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 projects; (d) a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project; (e) for a project located within an airborne land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airstrip, expose people residing or working in the project area to excessive noise levels; or (f) for a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels.

Under the L.A. CEQA Thresholds Guide, a project would normally have a significant impact on noise levels from construction if the following occurs: (a) construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use; (b) construction activities lasting more than ten days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or (c) construction activities would exceed the ambient noise levels by 5dBA at a noise sensitive use between the hours of 9:00 PM and 7:00 AM Monday through Friday, before 8:00 AM or after 6:00 PM on Saturday, or anytime on Sunday. Additionally, a project would normally have a significant impact on noise levels from project operations if the project causes the ambient noise levels measured at the property line of affected uses to increase by 3dBA in Community Noise Equivalent Level ("CNEL") to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase.

Operational Noise

The Project's operation will not expose persons to or generate noise levels in excess of applicable standards of the applicable CEQA thresholds of significance. Impacts would be less than significant. Similarly, impacts for Alternative 4 would be less than significant.

The Project's operations would produce both direct and indirect noise impacts on the Project Site from residential-related activities, as well as direct noise impacts from stationary noises associated with building operations, such as heating, ventilation, and air conditioning (HVAC) systems, and indirect noise impacts from vehicles traveling on local roads to access the Project Site. Parking noise can typically generate an instantaneous noise level of up to an approximate

58.1 dBA at 50 feet. The Proposed Project would provide enclosed subterranean, at-grade, and second level parking. Enclosed parking noise, such as door slams, is typically not audible from exterior at- or above-grade sensitive receptors. However, there may be a slight increase in the frequency of parking noise from street parking. Given the ambient noise levels of the surrounding sensitive receptors, the increase in noise at each sensitive receptor would be less than 3 dBA, and would not normally be audible. Specifically, the nearest sensitive land use, Molino Lofts residences, are located 60 feet west of the Project site. At 60 feet of distance, the Project's parking garage-related noise levels would be 51.8 dBA Leq. The existing ambient noise level at this receptor is 62.5 dBA Leq. With the addition of parking garage-related noise, the composite noise level at this receptor would be 62.9 dBA Leq, only a 0.4 dBA increase. This potential noise impact is considered less than significant. The Project's peak hour traffic would not cause any roadway segment to experience a noise increase of 3 dBA to or within its respective "normally unacceptable" or "clearly unacceptable" noise category, or any 5 dBA or greater noise increase overall, the Project's off-site operational noise impact would be considered less than significant.

For direct noise, section 41.40 and Chapter XI, Articles 1 through 6, of the LAMC require that noise generated by mechanical equipment not exceed 5 dBA ambient noise levels at adjacent property lines. Large ground level heating, ventilation, and HVAC systems typically generate noise levels between 50 and 65 dBA at 50 feet. Rooftop equipment typically produces noise levels of up to approximately 56 dBA at 50 feet. The nearest land use would be the residences located approximately 20 feet west of the Project Site, across Mateo Street. Due to the proximity of the nearby sensitive receptors, HVAC systems could increase noise levels marginally if mounted on the ground level. However, the height difference between the Proposed Project and nearby sensitive receptors (with the Proposed Project being significantly taller than surrounding receptors) makes significant noise increases unlikely since HVAC systems will be mounted on the Project rooftop. For example, the existing ambient noise level of the receptor was measured to be 62.9 dBA Leq. With the addition of HVAC noise, the noise level at this receptor would be 63.0 dBA, a 0.1 dBA increase and a less than significant impact. Given the proposed location of HVAC units on the roof of the Proposed Project, this noise impact from stationary sources is considered less than significant.

Since the sources of operational noise for Alternative 4 are the same as described above in this finding, Alternative 4 would not cause any significant impacts due to operational noise.

No mitigation measures are required, as no significant noise impacts associated with the Project's operation have been identified. Project Design Feature NOI-PDF-1 will ensure operational impacts are less than significant:

Project Design Feature

NOI-PDF-1 – The HVAC system and associated mechanical equipment proposed for the Project will be located on the roof of the building and not at ground level.

Construction Groundborne Vibration

The Project's construction would not generate vibration levels that would expose persons to excessive groundborne vibration or groundborne noise levels. The impact would be less than significant. For the same reason, Alternative 4 would also have less than significant impacts.

There are no major stationary sources of vibration near the Project Site. The Project's construction activities would generate groundborne vibration. The nearest residential structures to the Project Site would be approximately 20 feet from occasional heavy equipment activity and could experience vibration levels up to 0.106 inches per second. Vibration levels at this and

other receptors would not exceed the potential building damage threshold of 0.2 inches per second for non-engineered buildings. Thus, the impact of construction-related groundborne vibration at nearby residential land uses is therefore considered less than significant. Best practices will minimize any impacts that could annoy local residents and workers. Since construction of Alternative 4 would be similar, Alternative 4's impacts would be less than significant.

No mitigation measures are required, as no significant impacts associated with vibration from construction have been identified. However, Mitigation Measures NOI-MM-10 and NOI-MM-11 would further reduce the Project's less than significant construction related groundborne vibration levels. These mitigation measures are best management practices that will minimize impacts at nearby sensitive receptors.

Mitigation Measures

NOI-MM-10 – Construction activities shall utilize rubber tired equipment in place of steel-track equipment whenever feasible.

NOI-MM-11 – The noise disturbance coordinator identified in Mitigation Measure NOI-MM-8 shall also be responsible for receiving local complaints about construction vibration. The disturbance coordinator shall determine the cause of the vibration complaints and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs, legible at a distance of 50 feet, at the construction site shall list the telephone number for the disturbance coordinator.

Alternative 4 will comply with these Mitigation Measures.

Operational Vibration Levels

The Project's operation would not generate vibration levels that would expose persons to excessive groundborne vibration or groundborne noise levels. The impact would be less than significant. Alternative 4 would similarly result in less than significant impacts.

Neither Alternative 4 nor the Proposed Project would include significant stationary sources of groundborne vibration, such as heavy equipment operations. Operational groundborne vibration in the Project vicinity would be generated by vehicular travel on the local roadways. However, similar to existing conditions, traffic-related vibration levels would not be perceptible by sensitive receptors. Therefore, the Project's operational vibration impacts would be considered less than significant. For the same reasons, Alternative 4's impacts would be less than significant.

No mitigation measures are required, as no significant impacts associated with vibration from operation of the Project or Alternative 4 have been identified.

Within Airport Land Use Plan or 2 Miles of a Public Airport/Private Airstrip

Neither Alternative 4 nor the Proposed Project would not expose people working or residing in the project area to excessive noise associated with an airport land use plan or within two miles of a public airport. Therefore, no significant impact would occur.

There are no airports or private airstrips within a two-mile radius of the Project Site, and the Project Site is not within any airport land use plan or airport hazard zone. Neither Alternative 4 nor the Project would expose people to excessive noise levels associated with airport uses. Therefore, no significant impact would occur.

No mitigation measures are required, as no significant impacts associated with excessive noise associated with an airport land use plan have been identified.

Population and Housing

Under CEQA's Guidelines (Appendix G), a project may have a significant environmental impact if the project would result in one or more of the following: (a) induce substantial 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; or (c) displace substantial numbers of people, necessitating the construction or replacement housing elsewhere.

Under the L.A. CEQA Thresholds Guide, the determination of significance for a project's impacts on population, housing, and employment shall be determined on a case-by-case basis considering the following factors: (a) the degree to which the project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; (c) the extent to which growth would occur without implementation of the project; (d) the total number of residential units to be demolished, converted to market rate, or removed through other means as a result of the project, in terms of net loss of market-rate and affordable units; and (e) the current and anticipated housing demand and supply of market rate and affordable housing in the project area.

Construction

Neither the construction of the Project nor Alternative 4 would induce substantial population or housing growth, either directly or indirectly. There would be no significant impacts.

Construction of the Project or Alternative 4 would result in increased employment opportunities in the construction field, which could potentially result in increased permanent population and demand for housing in the vicinity of the Project Site. However, the employment patterns of construction workers in Southern California are such that it is not likely that they would relocate their households as a consequence of the construction employment associated with the Project. The construction industry differs from most other industry sectors. For example, there is no regular place of work in the construction industry, many construction workers are highly specialized and move between job sites as dictated by demand for their skills, and workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process. Therefore, Project-related construction workers would not be likely to relocate their place of residence as a consequence of working on the Project or Alternative 4. Such construction would not represent a permanent or substantial new employment generator that would cause growth. There would be no significant housing or population impacts from construction of the Project or Alternative 4 and, therefore, no impact related to construction-related population growth would occur.

No mitigation measures are required, as no significant impacts associated with substantial population or housing growth related to construction have been identified.

Operation

Neither Alternative 4 nor the Proposed Project would induce substantial population or housing growth, either directly or indirectly. Therefore, this impact would be less than significant.

The proposed office, retail, and restaurant land uses within the Project would generate a net increase of approximately 43 employees after the existing warehouse uses on-site are removed. Alternative 4's non-residential uses would generate a net increase of 303 employees. It is likely that the existing availability of employees in the Project area would fill these new jobs and would not draw new people to the City to fill the jobs. Thus, operation of the Project or Alternative 4 would not cause an increase in population. Therefore, no significant impact related to operation-related indirect population growth would occur.

The Project would not induce substantial growth that exceeds growth forecasted for the area, nor would it introduce unplanned infrastructure or accelerate development in an undeveloped area that would result in an adverse physical change in the environment. The Project Site is currently developed with an industrial building and is located within an urbanized area in the City. Thus, the construction of a potential growth-inducing roadway or other infrastructure extensions would not be required. As development of the Project would not induce substantial indirect population growth and would be supported by the existing infrastructure such as roadways, no impact would occur.

With respect to direct population and housing growth, the Project's construction of 600 additional live-work units at the Project Site would result in an increase in up to approximately 1,662 new permanent residents in the City of Los Angeles at the Site. Alternative 4 would result in an increase of 1,316 new residents at the Site. This proposed increase in housing units and population would be consistent with the SCAG forecast of 364,800 additional households and approximately 763,900 additional persons in the City of Los Angeles between 2012 and 2040. During the 2015 to 2020 forecast timeframe, the population and housing pf the Project and Alternative 4 would represent approximately 2 to 3 percent of the City's projected population and housing growth (respectively). During the 2012 to the 2040 forecast timeframe, the population and housing of the Project and Alternative 4 would represent less than one percent of the City's projected growth. The Project would contribute 600 dwelling units toward the projected need of 11,490 dwelling units in the Community Plan area, while Alternative 4 would contribute 475 dwelling units toward this projected need. It should be noted that the Project's percentage of forecast citywide population growth conservatively assumes that all 1,662 projected residents of the Project would be in-migrants to the City and would not be relocating to the Project from elsewhere within the City of Los Angeles. In addition to being consistent with household growth forecasts for the City and the Community Plan and the population growth associated with the projected housing growth, the Project and Alternative 4 would be consistent with all of the applicable residential policies set forth in Community Plan. The Project and Alternative 4 responds to the unmet housing demand in both the City and Community Plan area. Thus, while Alternative 4 and the Project would generate a residential population at the Site through the development of new housing, neither Alternative 4 nor the Project would substantially induce housing growth beyond forecasted levels. Therefore, impacts related to population and housing growth would be less than significant

No mitigation measures are required, as no significant impacts associated with substantial population or housing growth related to the Project's operation have been identified.

Displace Housing or Persons

Neither Alternative 4 nor the Proposed Project would displace substantial numbers of existing housing, necessitating the construction of replacement housing. Therefore, no significant impact would occur. The Project Site does not include existing residential uses and would not displace any existing housing or displace people. Therefore, no impact would occur. Because Alternative 4 would be constructed on the same Site, it would also cause no such impacts. No mitigation measures are required, as no significant impacts associated with displacing existing housing or requiring new housing have been identified.

Cumulative Impacts

Neither Alternative 4 nor the Proposed Project, in conjunction with the Related Projects, would contribute to significant cumulative impacts associated with population and housing or employment growth.

The City analyzed the Project's cumulative impacts on population and housing considering the Related Projects located within the City, since that is the jurisdiction where the Project is located. A total of 183 cumulative projects were identified in the study area. These projects include the development of approximately 51,676 dwelling units in the downtown Los Angeles area. It is possible that some of these cumulative project sites already include residential land uses that would be removed with implementation of the cumulative projects, and as such, the total net number of dwelling units to be developed would be smaller. However, for a conservative analysis, it is assumed that all 51,676 dwelling units would be net new units. With the Proposed Project added to this total, the number of cumulative housing units would be 52,276 units, generating approximately 144,805 cumulative residents (using the 2.77 persons per household rate as an average). That number would be slightly less under Alternative 4 since fewer live/work units would be developed. For a conservative analysis, it is assumed that these cumulative residents would be new to the City. This cumulative housing and associated residential population increase would represent approximately 14.3 percent and 19 percent (respectively) of the projected increase in housing and population between the years 2012 and 2040. This cumulative housing growth would further the City's objective of providing 95,023 housing units within the City by 2021. Thus, cumulative housing and population growth would fall within projected levels for the City. Therefore, cumulative impacts related to population and housing would be less than significant.

No mitigation measures are required, as no significant cumulative impacts associated with housing or employment growth have been identified.

Public Services – Fire Protection Facilities

Under CEQA's Guidelines (Appendix G), a project would have a significant impact if the project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection.

Under the City's CEQA Thresholds Guide, the determination of significance levels for a project's impact on fire protection services shall be made on a case-by-case basis considering whether the project would require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service.

Construction

Neither the construction of Alternative 4 nor the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts would be less than significant. Alternative 4 would also not result in significant impacts.

Construction activities associated with the Project or Alternative 4 may temporarily increase demand for fire protection and emergency medical services, and may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to

heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with Occupational Safety and Health Administration and Fire and Building Code requirements, construction managers and personnel would be trained in fire prevention and emergency response. Fire suppression equipment specific to construction would be maintained on-site. Additionally, construction would comply with applicable existing codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Therefore, in light of State and City regulations and code requirements that would in part require personnel trained in fire prevention and emergency response, maintenance of fire suppression equipment, and implementation of proper procedures for storage and handling of flammable materials, construction impacts on fire protection and emergency medical services would be less than significant.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and by necessitating partial lane closures during street improvements and utility installations. These impacts, while potentially adverse, are considered to be less than significant because the impacts are temporary, will be minimized through good housekeeping procedures by construction crews, and any temporary lane closure impacts will be addressed through the Construction Traffic Management Plan. Even with the Construction Traffic Management Plan, it is accepted that the Project would incrementally increase traffic, which could potentially delay emergency response times. As noted above, there are a number of factors that influence emergency response times in addition to traffic, including alarm transfer time, alarm answering and processing time, mobilization time, risk appraisal, geography, distance, traffic signals, and roadway characteristics.

Overall, construction is not considered to be a high-risk activity, and the LAFD is equipped and prepared to deal with construction-related traffic and fires should they occur. Project construction would not be expected to tax fire-fighting and emergency services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD, due to the limited duration of construction activities and compliance with applicable codes. Therefore, impacts associated with construction of the Project or Alternative 4 would be less than significant.

No mitigation measures are required, as no significant impacts associated with fire protection facilities from construction have been identified.

Operation

Neither Alternative 4 nor the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Therefore, no significant impacts would occur.

Both Alternative 4 and the Project would generate new residents, visitors, and employees and would also increase the amount of developed square footage on the Project Site. Therefore, both Alternative 4 and the Project could result in an increased need for fire protection and emergency medical services at the Project Site. However, neither Alternative 4 nor the Project would create the need for new or physically altered fire protection facilities. Further, an analysis of the criteria for determining a project's impacts to fire protection services (e.g. fire flow, response distance and time, and emergency action) demonstrated that the operation of the Project or Alternative 4 will have less than significant impacts. With respect of fire flow, the Los Angeles Department of Water and Power's Water Operations Division would perform a detailed fire flow study at the time of permit review to determine whether further water system or site-

specific improvements would be necessary. Hydrants, water lines, and water tanks would be installed per Division 7, Section 57.09.06 of the Fire Code requirements for the Project. The Project Applicant would also be required to submit the proposed plot plans for the LAFD to review for compliance with the City's Fire Code, California Fire Code, City's Building Code, and National Fire Protection Association standards to ensure no undue fire hazard would be created. The Project Site is not located within an Inadequate Fire Hydrant Service Area recognized by the City. As such, with respect to fire flows, fire protection services would be adequate and the associated impact would be less than significant.

With respect to response distance and time, the nearest fire station with an engine is Station No. 4, approximately 0.9 mile away from the Project Site. The LAFD's ability to provide adequate fire protection and emergency response services to a site is determined by the response distance and the degree to which emergency response vehicles can successfully navigate the given accessways and adjunct circulation system, which is largely dependent on roadway congestion and intersection level of service (LOS) along the response route. The Project Site is located within the maximum acceptable response distances for both fire engines and truck companies shown in Table 4.K.1-2 and fire protection would be considered adequate by LAFD standards. Therefore, the impact of the Project and Alternative 4 upon emergency response distance would be less than significant.

Further, LAFD has recently been taking a number of steps to improve their related systems, processes and practices. Upgrades underway or pending include: installation of automated vehicle locating systems on all LAFD apparatus; replacement of fire station alerting systems that control fire station dispatch audio, signal lights, and other fire station alerting hardware and software; development of a new computer aided dispatch system to manage fire and emergency medical service incidents from initial report to conclusion of an incident; and, use of traffic pre-emption systems. A traffic pre-emption system allows the normal operation of traffic lights to be preempted by an emergency vehicle to improve response times by stopping conflicting traffic in advance, providing the emergency vehicle the right-of-way. In addition to these improvements, emergency response is also routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternate routes, and multiple station response. With these mobility features that can reduce traffic delays, impacts on response times are considered less than significant.

For emergency access, the Project Applicant is required to submit the proposed plot plans for the Project to LAFD for review and compliance with the City's Fire Code, the California Fire Code, the City's Building Code, and National Fire Protection Association standards to ensure that the Project would not create an undue fire hazard. The Project Applicant would consult with neighboring land uses and the emergency response plan would include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. Additionally, the Project Site is located within one mile of two hospitals, which house 24-hour emergency departments.

Neither Alternative 4 nor the Project would conflict with, or impede implementation of, any of the policies or goals related to fire protection described in the Los Angeles Fire Protection and Prevention Plan, or the Central City North Community Plan, which describes the planning of facilities. Both Alternative 4 and the Project will also generate revenue into the City's General Fund, which would help the LAFD achieve progress toward its goal to ensure adequate fire facilities and protective services for existing and future population and land uses.

LAFD review and compliance with applicable regulations is a legal prerequisite, and Mitigation Measure FIR-MM-1 restates this requirement. The Project would also generate revenues to the City's General Fund (e.g., in the form of property taxes and sales tax revenue) that could be applied toward the provision of new fire facilities and related staffing, as deemed appropriate.

Thus, the impact of the Project and Alternative 4 upon emergency response distances would be less than significant.

Furthermore, the Project Applicant would be required to submit an emergency response plan for approval by the LAFD, to help ensure that construction and operations would not impede fire access to and from the Project Site, which would create the need for new or physically altered facilities. For the reasons listed above, impacts related to emergency access and performance objectives would be less than significant.

To ensure that fire protection services are adequate within the proposed buildings and around the Project Site, Project Design Features FIR-PDF-1 through FIR-PDF-4 would be included. These features allow the LAFD to ensure that neither the Project nor Alternative 4 will increase demand on the fire department to the extent that a new or significantly expanded facility is needed, the construction of which may cause a significant impact on the environment. Mitigation Measure FIR-MM-1 contains the recommendations made by the LAFD during their initial review of the Proposed Project.

Overall, as described above, neither Alternative 4 nor the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection.

As a legal prerequisite, LAFD review and compliance with applicable regulations is requires as set forth in Mitigation Measure FIR-MM-1. Furthermore, to ensure that fire protection services are adequate within the proposed buildings and around the Project Site, Project Design Features FIR-PDF-1 through FIR-PDF-4 would be included.

Mitigation Measure

FIR-MM-1 – Submittal of a plot plan for approval by the LAFD either prior to the recordation of a final map or the approval of a building permit shall be required. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

In addition, the following recommendations of the LAFD relative to fire safety shall be incorporated into the building plans:

- Access for Fire Department apparatus and personnel to and into all structures shall be required.
- The entrance to a residence lobby must be within 50 feet of the desired street address curb face.
- Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units.
- The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
- No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
- The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.

- Building designs for multi-storied residential buildings shall incorporate at least one access stairwell off the main lobby of the building; but, in no case greater than 150 feet horizontal travel distance from the edge of the public street, private street or Fire Lane. This stairwell shall extend unto the roof.
- Entrance to the main lobby shall be located off the address side of the building.
- Any required Fire Annunciator panel or Fire Control Room shall be located within 50 feet of the visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department.
- Where rescue window access is required, provide conditions and improvements necessary to meet accessibility standards as determined by the Los Angeles Fire Department.
- Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.
- The width of private roadways for general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky.
- Fire lanes, where required, and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.
- Submit plot plans indicating access road and turning area for Fire Department approval.
- Adequate public and private fire hydrants shall be required.
- Standard cut-corners will be used on all turns.
- Any roof elevation changes in excess of three feet may require the installation of ships ladders.
- The Fire Department may require additional roof access via parapet access roof ladders where buildings exceed 28 feet in height, and when overhead wires or other obstructions block aerial ladder access.
- All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued.
- Plans showing areas to be posted and/or painted "FIRE LANE NO PARKING" shall be submitted and approved by the Fire Department prior to building permit application sign-off.
- Electric Gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety granting a Certificate of Occupancy.
- All new buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety communication systems of the jurisdiction at the exterior of the building. This section shall not require improvement of the existing public safety communication systems.
- Helicopter landing facilities are required on all high-rise buildings in the City in accordance with the recently revised Fire Protection Bureau Requirement 10.
- Each standpipe in a new high-rise building shall be provided with two remotely located fire department connections (FDCs) for each zone in compliance with NFPA 14-2013, Section 7.12.2.

Alternative 4 would comply with this measure.

Project Design Features

FIR-PDF-1 – The construction contractors and work crews shall properly maintain the mechanical equipment according to best practices and the manufacturers' procedures, ensure proper storage of flammable materials, and cleanup of spills of flammable liquid.

FIR-PDF-2 – If there are partial closures to streets surrounding the Project Site, flagmen shall be used to facilitate the traffic flow until the street closure around the construction is complete.

FIR-PDF-3 – During demolition and construction, LAFD access from major roadways shall remain clear and unobstructed.

FIR-PDF-4 – The design of the Project Site shall provide adequate access for LAFD equipment and personnel to the structures.

Alternative 4 will also incorporate these Project Design Features.

Cumulative Impacts

Neither Alternative 4 nor the Proposed Project would result in cumulatively considerable adverse physical impacts associated with the provision of new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Cumulative impacts would be less than significant.

Development of either Alternative 4 or the Project in conjunction with the Related Projects would increase demand for fire protection services based on an increase in residential population and employees in the Project area. However, due to the large geographic scope of the location of the Related Projects, some would be served by additional LAFD stations that differ from the Project. Cumulative development requires LAFD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. The Related Projects within the City would also be required to consult with the LAFD and would be subject to the requirements of the City's Fire Code, including the requirement to install automatic fire sprinkler systems if a project is located at a distance to the nearest fire station that exceeds the LAFD required response distance. The Related Projects would also contribute to funding fire protection services in the area by generating annual revenue to be deposited into the City's General Fund. While the Related Projects may create demand on fire protection staffing, equipment, or facilities such that a new station would be required, since the Project does not create such demand, its contribution to those impacts is not cumulatively considerable.

No mitigation measures are required, as no cumulative significant impacts associated with fire protection facilities have been identified.

Public Services – Police Services

Under CEQA's Guidelines (Appendix G), a project could have a significant environmental impact if the project would result in substantial adverse physical impacts with the provision of new or physically altered police protection facilities, need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection.

Under the City's CEQA Thresholds Guide, the determination of significance for the Project's impacts on police protection shall be made on a case-by-case basis, considering the following factors: (a) the population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for police services anticipated at the time of project buildout compared to the expected level of service available; (c) whether the project includes security and/or design features that would reduce the demand for police services.

Cumulative Impacts

Neither Alternative 4 nor the Proposed Project, in conjunction with the Related Projects, would result in cumulatively considerable adverse physical impacts associated with the provision of new or physically altered police protection facilities in order to maintain acceptable service rations, response times, or other performance objectives. Therefore, this impact would be less than significant.

Implementation of either Alternative 4 or the Project in conjunction with the Related Projects would increase demand for police protection services based on an increase in resident population. It is estimated that the cumulative projects would generate approximately 144,805 residents and 52,276 housing units. Many of the cumulative projects listed would be served by the Central Community Police Station. However, due to the relatively large geographic scope of the cumulative project locations, some would be served by other police stations. In order to maintain existing officer-to-resident ratios, and assuming that all of the cumulative projects would be served by the Central Community Police Station, this cumulative residential population growth within the study area would result in a need for 934 additional officers within the Central Area. The Central Community Police Station has 397 sworn police officers. The addition of 934 officers to maintain the existing ratio would more than double existing Central Area staff levels. Consequently, the demand for 934 additional officers to maintain current resident service ratios would likely require the expansion of the existing station or construction of a supplemental station.

The cumulative projects would generate approximately 3,071,894 square feet of retail, 7,361,659 square feet of office, 548,794 square feet of restaurant, and 32,140 square feet of museum uses. These uses (retail, office, restaurant, and museum/cultural) are the same uses as the Project or Alternative 4, and thus may combine to create an impact via the generation of new employment within the study area. Other employee generators proposed for the study area include hotel, manufacturing/industrial, market/pharmacy/health club, and sports complex uses. Because the reported crime data does not reflect crimes committed only by residents, the nonresident (employee) population is also used when projecting crime statistics. Therefore, the cumulative population increase of approximately 144,805 persons and approximately 33,883 employees plus the Proposed Project's population and employee generation (1,662 persons and 43 employees) would equate, based on past crimes-per-resident rates, to an increase of approximately 23,812 crimes, compared to the 8,161 crimes in the Central Area in 2014.

Any new or expanded police station within the Central Area would be funded via existing mechanisms (e.g., property and sales tax revenue) to which both the Project and the cumulative projects would contribute and would be required to undergo City environmental review to identify any potential adverse environmental impact associated with its construction and/or operation and to identify mitigation for any significant impacts. Each of the cumulative projects would be individually subject to LAPD review, and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands.

In addition, the cumulative projects would contribute to funding police protection services in the area by generating annual revenue from property taxes that would be deposited into the City's General Fund and could potentially be used to fund the construction of future police protection facilities and support hiring more officers. This would further ensure that the incremental effect of either the Project or Alternative 4 on police protection services would not be cumulatively considerable. Because it would not result in a substantial incremental contribution to the cumulative demand for police protection services, neither the Project nor Alternative 4 would have a cumulatively considerable impact on police protection services.

No mitigation measures are required, as no cumulatively significant impacts associated with police services have been identified.

Public Services – Public Schools

Under CEQA's Guidelines (Appendix G), a project may have a significant environmental impact related to schools if it will result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which would cause significant environmental impact, in order to maintain acceptable service ratios or performance objectives for the school district.

Under the City's CEQA Thresholds Guide, the determination of a project's impacts on schools must be made on a case-by-case basis considering the following factors: (a) the population increase resulting from the proposed project, based on the increase in residential units or square footage of non-residential floor area; (b) the demand for school services anticipated at the time of project buildout compared to the expected level of service available, considering (as applicable) scheduled improvements to Los Angeles Unified School District ("LAUSD") services (facilities, equipment and personnel) and the project's proportional contribution to the demand; (c) whether (and the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the schools; and (d) whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

Construction

Neither construction of Alternative 4 nor the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities in order to maintain acceptable service ratios or other performance objectives. Therefore, impacts would be less than significant.

The Project Site is not in close proximity to any schools. The nearest school is the Korpus School of Art and Gallery, located approximately 700 feet to the southwest and separated from the Project Site by intervening development. The presence of these buildings would ensure that Project construction does not affect the school. The Project Site is accessed via a heavily used transportation corridor (4th Street and Santa Fe Avenue) and is located near the Hollywood Freeway (US 101), which would be used by haul trucks and for other regional access needs during Project construction. Although the potential exists for periodic sidewalk closures resulting from Project construction activities, no such closures are expected to occur near any schools. No haul trucks would pass any nearby schools. Therefore, impacts to schools during Project construction would be less than significant. Because Alternative 4 would be constructed on the same Site, its impacts would be less than significant for the same reasons.

No mitigation measures are required, as no significant impacts associated with school facilities from the Project's construction have been identified.

Operation

Operation of neither Alternative 4 nor the Proposed Project would result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities in order to maintain acceptable service ratios or other performance objectives.

Both Alternative 4 and the Project would increase the number of residents and employees resulting from the Project and the potential need to enroll school-aged children residing at the Project into LAUSD schools would increase the demand for school services. The LAUSD provides five-year projections on the total number of students living in the school's attendance

area and who would be eligible to attend the school. There are no projections provided beyond that timeframe. With the addition of project-generated students to potential/eligible school enrollments, 9th Street Elementary would operate under capacity by 33 students, Hollenbeck Middle would operate under capacity by 153 students, and the Boyle Heights Zone of Choice schools (Roosevelt High, Mendez High, and Boyle Heights STEM) would operate under capacity by 2,079 students. With the addition of Project-generated students to potential school enrollments, none of the schools serving the Project would be over projected student capacity. In addition, pursuant to the California Government Code, mandatory payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Mandatory compliance with the provisions of SB 50 regarding payment of school fees is deemed to provide full and complete mitigation of school facilities impacts and no mitigation is required. Therefore, Project impacts to school services would be less than significant.

Neither Alternative 4 nor the Project would conflict with, or impede implementation of, any of the policies or goals related to schools described in the Framework Element of the General Plan or Central City North Community Plan, which describe the planning of facilities. The Project, through the payment of fees, would help the LAUSD achieve progress toward its goal to ensure adequate school facilities for existing and future population.

Alternative 4 would have reduced impacts on schools in that it would also have to pay SB 50 fees and would generate less students given the fewer number of live/work units. Therefore, Alternative 4's impacts to schools would be less than significant.

No mitigation measures are required, as no significant impacts associated with school facilities operation have been identified.

Cumulative Impacts

Neither Alternative 4 nor the Proposed Project, in conjunction with the Related Projects, would contribute to significant cumulative impacts associated with schools.

LAUSD's facility planning assumptions are based on overall demographic trends, and although not specifically based upon new development projects, are intended to address changes in student enrollment arising from area population trends from various sources, including new development. Implementation of the Project in conjunction with the cumulative development projects would generate students based on an increase in dwelling units and non-residential uses (employees' students). It is estimated that the cumulative projects would generate approximately 144,805 residents and 52,276 housing units. It is estimated that the cumulative projects would generate approximately 33,883 employees. All of the cumulative development projects would be served by the LAUSD and a portion of them would be located within the same school service zones as the Project, and thus would be impacting the same schools as the Project. This increase in the residential population of the area is estimated to generate a total of approximately 36,593 students (20,910 elementary, 5,228 middle, and 10,455 high school students). Depending on their location, the cumulative projects would be served by a variety of LAUSD schools located in the area. In addition, the students could be enrolled in private schools or one of the LAUSD charter or magnet schools located in the area. All other future projects would be required to pay a school fee to the LAUSD to help reduce cumulative impacts that they may have on school services. Compliance with the provisions of SB 50 is deemed to provide full and complete mitigation of school facilities impacts. Therefore, with the full payment of all applicable school fees, the Project coupled with expected cumulative growth would reduce potential projected cumulative impacts to schools. As neither Alternative 4 nor the Project would result in a substantial incremental contribution to the cumulative demand for school services.

No mitigation measures are required, as no significant cumulative impacts associated with school facilities have been identified.

Public Services – Parks

Under CEQA's Guidelines (Appendix G), a project may have a significant environmental impact if it were to: (a) result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks; (b) 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; and (c) include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Under the City's CEQA Thresholds Guide, the determination of significance for a Project's impacts on parks and recreation shall be made on a case-by-case basis, considering the following factors: (a) the net population increase resulting from the project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available, considering (as applicable) scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for recreation and park services (e.g., on-site recreation, facilities, land dedication or direct financial support to the Department of Recreation and Parks).

Operation

The Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks and recreational facilities. Therefore, impacts would be less than significant. Alternative 4 would have similar less than significant impacts.

A project's impacts with respect to parks and recreational facilities are determined based on the ability of existing parks and recreational facilities in the project area to accommodate the project's need for such facilities. The Project would generate approximately 1,662 residents and a net increase of approximately 43 employees (after removal of the existing uses). Employees generated by the office/retail/commercial uses of the Project would not typically enjoy long periods of time during the workday to visit parks and/or recreational facilities, and would therefore not contribute to the future demand on park services. In addition, the Project would include an amenity area in the center of the site (at the podium level), which would provide passive lounge area uses for employees to enjoy on breaks or before or after work.

Under the City's Public Recreation Plan ("PRP") within the City's General Plan, the City's standard ratio of neighborhood and community parks to population is four acres per 1,000 persons and the City's standard ratio of regional parks to population is six acres per 1,000 persons. Based on those ratios, the Project would generate a demand of approximately 6.65 acres of new neighborhood and community parkland and 9.97 acres of regional parkland. However, the Project includes a pool and spa, as well as barbecue and lounging areas, on the podium level, and rooftop lounge and deck with a pool. In addition, recreational rooms and workout/gym facilities would be provided for the use of the live/work unit occupants on various floors of the Project. The proposed landscaped pedestrian paseos would provide additional open space on the north and south sides of the Project. The Draft EIR noted that the applicant was in negotiations to purchase a strip of land, which would contribute to the public paseo. The applicant has since obtained title to that property, ensuring the public paseo as designed would be included as part of the Project and Alternative 4. These amenities would serve to reduce the

Project's demand for and use of existing recreation and park facilities in the local area. The Project would provide at least the code-required open space, in the form of various common open space areas, landscaping, and private open space (unit balconies) as permitted by LAMC Article 2, 12.21(G). That provision of open space amenities would serve to reduce the Project's demands and use upon existing recreation and park facilities in the local area.

The Project would not conflict with, or impede implementation of, any of the policies or goals related to parks described in the Framework Element of the General Plan or Central City North Community Plan, which describe the planning of facilities. The Project, through the payment of the required Quimby fees and/or Parkland fees, would help the LADRP achieve progress toward its goal of ensuring adequate park facilities for existing and future residential populations within the Central City North community.

Because the Proposed Project was deemed fully vested by the City prior to the effective date of the 2016 Park Fee ordinance, the Project is not subject to the requirements of this ordinance. However, the Project is required to comply with the sections of the LAMC pertaining to the payment of Quimby and Parkland fees that were in place prior to the effective date of the new Park Fee ordinance. If a final map is recorded or there is a zone change (the Project is seeking a zone/height district change), then the Project is subject to Quimby Fees and/or Finn Fees. However, if a final map is not recorded and apartments are pursued (to a certificate of occupancy), the Project would instead be subject to the Dwelling Unit Construction Tax (DUCT) and applicable Finn Fees. The Project's compliance with the above-referenced Code requirements collectively address the Project's future demand upon recreation and park facilities by contribution of funds to be placed in a City-controlled account to be used to acquire and develop new parkland areas within the Project's service area. Project features (public space, pedestrian paseos, and open space) would also reduce the Project's impact to a less than significant level. Since Alternative 4 would construct similar recreational amenities and pay the same fees, its impacts to parks would be less than significant.

No mitigation measures are required, as no significant impacts associated with parks and recreational facilities have been identified.

Cumulative Impacts

Neither Alternative 4 nor the Proposed Project would result in significant cumulative impacts associated with the provision of new or physically altered parks and recreational facilities. Therefore, impacts would be less than significant.

The extent to which the residential Related Projects include parks or recreational amenities s unknown. However, each residential project in the City will be required to comply with the City's Quimby Ordinance and/or Dwelling Unit Construction Tax payment. Compliance with these ordinances would mitigate potential park and recreational facility impacts associated with the construction of these projects. Additionally, the City can use General Fund revenues from these projects to help meet its target parkland planning ratios in order to meet the needs of existing and future development.

Under CEQA Guidelines section 15130(a)(3), a project's contribution to cumulative impacts is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure designed to alleviate the cumulative impact. Since the Project would be required to mitigate its impacts upon public recreation and park facilities by paying mandatory Quimby/Park fees and/or Recreation and Park Fees in addition to providing the mandatory code-required open space areas and on-site recreational amenities, the Project's impacts would not be considered cumulatively considerable. Those fees are mandatory and proportionate based on the Project's residential density.

No mitigation measures are required, as no significant cumulative impacts associated with parks and recreational facilities have been identified.

Public Services – Libraries

Under CEQA's Guidelines, a project may have a significant environmental impact if the project would: (a) 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 library services.

Under the L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following factors: (a) the net population increase resulting from the project; (b) the demand for library services anticipated at the time of project buildout compared to the expected level of service available, considering (as applicable) scheduled improvements to library services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct support to the Los Angeles Public Library).

Operation

Neither Alternative 4 nor the Proposed Project would result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities in order to maintain acceptable service ratios or other performance objectives. Therefore, impacts would be less than significant.

The Project would generate approximately 1,662 residents and approximately 43 employees (net after removal of the existing uses). Employees generated by the office/retail/commercial uses of the Project would not typically enjoy long periods of time during the workday to visit libraries during work hours, as they are more likely to use libraries near their homes during non-work hours, and so are not included for purposes of determining a service impact to libraries.

The Project is served by three nearby LAPL library branches as well as the LAPL's Central Library, with a combined 574,656 square feet of floor area. The library service population areas overlap so there is no discrete population analysis for library service. However, the LAPL has confirmed that there is no need for any planned improvements, either under its Strategic Plan or otherwise, to add capacity through expansion to any identified branch or build any new libraries in the Project area. The City's CEQA Thresholds Guide considers features (on-site library facilities, direct support to LAPL) that would reduce the demand for library services. It is likely that the residents of the Project would have individual access to internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations. Further, Measure L has provided funds to restore adequate services to the existing library system. For all of these reasons, it is not anticipated that the Project or Alternative 4 would result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services. Consequently, impacts to library service would be less than significant.

Neither Alternative 4 nor the Project would conflict with, or impede implementation of, any of the policies or goals related to libraries described in the Los Angeles General Plan Framework, Los Angeles Public Library Strategic Plan 2015–2020, and Central City North Community Plan. The

Project, through the generation of revenue into the City's General Fund, would help the LAPL achieve Objective 9.21, which seeks to ensure library service for current and future residents and businesses; achieve progress toward Goal 1, which seeks to improve communities by updating the Library Facilities Master Plan, planning new libraries, and increasing service hours, among other activities; and achieve progress toward its goal to ensure adequate library facilities and service, including new libraries or expansion of existing libraries.

Although the Project would increase the demand for library services through its resident population, it would not result in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. The Project population is estimated to be 1,662 persons, and the LAPL has confirmed that there are no planned improvements to add capacity through expansion to any identified branch or build any new libraries in the area. Thus, impacts to library services as a result of the Project would be less than significant. Alternative 4's impacts would be substantially similar and would be less than significant. Since Alternative 4 would develop fewer live/work units and therefore generate less demand on library services, its impact is also less than significant.

No mitigation measures are required, as no significant impacts associated with library facilities have been identified.

Cumulative Impacts

Neither Alternative 4 nor the Project, in conjunction with the Related Projects, would result in a significant cumulative impact associated with library facilities.

Implementation of the Project in conjunction with the Related Projects would generate approximately 144,805 residents and 52,276 housing units. Employees generated by the cumulative projects would not typically enjoy long periods of time during the workday to visit library facilities, and would, therefore, not contribute to the future demand on library services, and so are not included for purposes of determining a service impact to libraries. Depending on their location, the cumulative development projects would also be served by the same libraries as the Project, although some would be served by additional branches.

The increase in demand for library facilities as a result of these additional residents would be spread among the many libraries that are within a two-mile radius of each individual project. The LAPL has indicated that no improvements are either planned or have been identified as necessary to add capacity through expansion to any branch or to build any new libraries in the Project vicinity. Also, Measure L has provided funding to restore adequate services to the existing library system. Furthermore, the cumulative projects, through the generation of revenue into the City's General Fund, would help the LAPL achieve progress toward its goal to ensure adequate library facilities and service, including new libraries or expansion of existing libraries. As such, cumulative impacts would be less than significant.

Since Alternative 4 would develop fewer live/work units and therefore generate less demand for library services, it would not cause a significant cumulative impact on such services.

No mitigation measures are required, as no significant cumulative impacts associated with library facilities have been identified.

Transportation and Traffic

Under CEQA's Guidelines (Appendix G), a project would have a significant impact on traffic or transportation if it would cause any of the following conditions to occur: (a) conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance

of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit; (b) conflict with an applicable congestion management program, including but not limited to level of service 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; or (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.

Under the City's L.A. CEQA Thresholds Guide, a project would have significant impacts on traffic or transportation if it would cause any of the following conditions to occur: (a) would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections); (b) would the project exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways. The City's CEQA Thresholds Guide requires the transportation analysis to address the following areas of study: (1) intersection capacity; (2) street segment capacity; (3) freeway capacity; (4) neighborhood intrusion impacts; (5) project access; (6) transit system capacity; (7) parking; and (8) in-street construction impacts.

The Project's traffic analysis study area is generally bounded by 1st Street to the north, Soto Street to the east, Olympic Boulevard to the south, and Central Avenue to the west. A traffic analysis study area generally comprises those intersections with the greatest potential to experience significant traffic impacts due to the project, as defined by the City of Los Angeles. The Project's study area was established in consultation with LADOT, based on the above criteria, as well as peak hour Project trip generation, the anticipated distribution of Project traffic, and the existing intersections/corridor operations. It contains those 21 intersections with a reasonable potential to experience significant traffic impacts due to the Project. The same study area was used to evaluate the traffic impacts of the project alternatives, including Alternative 4.

New traffic counts for 17 of the 20 study intersections were conducted in the 2013-2015 time frame which is within the two-year window that LADOT considers acceptable. New intersection turning movement counts were collected at 17 of the 20 study intersections in 2013, 2014, and 2015. Based on discussions with LADOT staff, however, the collection of new traffic counts beyond the 2013-15 data already collected was not recommended, as new traffic counts would not reflect typical traffic patterns within the Study Area, since recent demolition of the 6th Street Viaduct and the resulting closure of 6th Street between Mateo Street and US-101 has shifted traffic to detour routes, specifically 4th Street and 7th Street. Based on discussions with LADOT staff, the collection of new traffic counts was not recommended, as new traffic counts would not reflect typical traffic patterns within the study area. Therefore, historical traffic count data from 2008 to 2015 were utilized, and an ambient growth rate of 1 percent per year was applied to the traffic counts to reflect regional growth and development between the year of the traffic count and 2016. The traffic counts conducted as part of this analysis (17 locations) or collected from City files (3 locations) were increased by a growth rate of between 1% and 8% to reflect 2016 conditions, and the calculated 2016 conditions were again expanded by 4% more to reflect year 2020 conditions. Although the turning movement counts were conducted during different days and months of the year, a review of the data and existing conditions indicated that the traffic volumes were consistent. Thus, for the purposes of this analysis, the Existing Conditions traffic

volumes represent conditions as of the issuance of the Project's MOU. Local schools were in session when the traffic counts were conducted.

The Traffic Study also evaluated the Project's potential traffic impacts by considering the following traffic conditions, consistent with the LADOT's Traffic Study Policies and Procedures:

- Existing Conditions (Year 2016) – the analysis of existing traffic conditions provides a basis for the assessment of future traffic conditions.
- Existing with Project Conditions (Year 2016) – this analysis evaluates the potential Project-related traffic impacts as compared to Existing Conditions.
- Future without Project Conditions (Year 2020) – This analysis condition projects the potential intersection operating conditions that could be expected as a result of regional growth and related project traffic in the Study Area by the year 2020.
- Future with Project Conditions (Year 2020) – This analysis condition projects the potential intersection operating conditions that could be expected if the Project were occupied in the projected buildout year.

Intersection Impacts to Existing Conditions With the Project

The Proposed Project's traffic impacts would not exceed the significance threshold at the intersections studied in the Study Area. The Project's impacts will be less than significant levels. Similarly, Alternative 4 would result in less than significant impacts.

All 21 study intersections are expected to continue to operate at LOS D or better during both the morning and afternoon peak hours under Existing with Project Conditions. Additionally, all of the projected increases in intersection volume/capacity (V/C) ratios caused by Project-generated traffic would be less than the threshold for a significant impact to occur. Therefore, the Project would not cause any significant traffic impacts in either the morning or afternoon peak hour when compared to existing conditions. Likewise, Alternative 4's impacts would be less than significant since, among other factors, Alternative 4 would generate 538 fewer total daily trips than the Proposed Project.

No mitigation is needed because the impacts will be less than significant.

Congestion Management Program

The Proposed Project would not conflict with an applicable congestion management program ("CMP"). The impact would be less than significant. Alternative 4 would have similar impacts and would be less than significant.

The Los Angeles County Congestion Management Program requires that a traffic impact analysis be performed for all CMP arterial monitoring intersections where a project would add 50 or more trips during either the weekday morning or afternoon peak hours. A significant impact requiring mitigation occurs if project traffic causes an incremental increase in intersection volume to capacity ("V/C") ratio of 0.02 or greater to a facility projected to operate at level of service ("LOS") F after the addition of project traffic. The CMP identifies the following one arterial monitoring intersections within approximately two miles of the Study Area: (i) Alameda Street & Washington Boulevard (1.5 miles southwest of the Project Site). Both Alternative 4 and the Project would add fewer than 50 peak hour trips at the arterial monitoring intersection nearest the Project study area. Therefore, the Project's and Alternative 4's CMP arterial intersection impacts are considered to be less than significant and no further analysis is required.

The CMP also requires that a traffic impact analysis be performed for all CMP mainline freeway monitoring locations where a project would add 150 or more trips (in either direction) during the weekday morning or afternoon peak hours. The CMP identifies the following one mainline freeway monitoring locations within the vicinity of the Project Site: (i) US 101 North of North Vignes Street. The Project and Alternative each would add fewer than 150 peak hour trips in each direction during both the morning and afternoon peak hours at the mainline freeway monitoring location nearest the Project study area. Therefore, the Project's and Alternative 4's CMP mainline freeway impacts are considered to be less than significant and no further analysis is required.

The CMP also requires that a transit system analysis be performed to determine whether a project would increase transit ridership beyond the current capacity of the transit system. The Project morning and afternoon peak hour person trips by transit are projected at 28 and 37 trips, respectively, or less than 3.7 percent of the total residual capacity of the bus lines within the study area during the morning and afternoon peak. Alternative 4's morning and afternoon peak hour person trips by transit are projected at 28 and 33 trips, respectively, or less than 3.7 percent of the total residual capacity of the bus lines within the study area during the morning and afternoon peak. Although the maximum ridership may currently exceed capacity along a specific local route (e.g., Metro Local 62) during both the morning and afternoon peak hours, overall the total transit capacity of the numerous bus lines can accommodate the Project's transit trips, with and without the promotion of transit usage with implementation of the Project's mitigation measures. Therefore, the Project's and Alternative 4's respective impact to the regional transit system is anticipated to be less than significant. Furthermore, although the Project and Alternative 4 (and other cumulative development projects) each would cumulatively add transit ridership, it is assumed that public transit providers would add additional service when required in order to accommodate cumulative demand in the region. Therefore, the Project's and Alternative 4's respective contribution to cumulative impacts on public transit would be less than significant.

No mitigation measures are required, as no significant impacts associated with a congestion management plan have been identified.

Utilities and Service Systems – Wastewater

Under CEQA's Guidelines, a project would have a potentially significant wastewater impact if it were to result in one or more of the following: (a) exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board; (b) require or result in the construction of new wastewater treatment facility or expansion of existing facilities, the construction of which would 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 would cause significant environmental effects; or (d) 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.

Under the L.A. CEQA Thresholds Guide, a determination of significance with respect to wastewater should consider the following: (a) whether the project would cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; and (b) whether the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its amendments.

Wastewater Generation and Infrastructure

Neither Alternative 4 nor the Project would require or result in the construction of new water or wastewater treatment facilities, the construction of which would cause significant environmental impacts. City regulations and incorporation of Project Design Feature PDF-M.1-3 would ensure the Project's impacts associated with wastewater infrastructure remain less than significant.

It is estimated that operation of the Project would generate a net total of approximately 102,933 gallons per day (gpd) (or 0.103 mgd) of wastewater. This total was reduced by the amount of wastewater that is currently being generated by the existing uses on the Project Site, which would be removed.

The Project Site is currently developed and adequately served by the existing wastewater conveyance system. As part of the building permit process, the City will confirm and ensure that there is sufficient capacity in the local and trunk lines to accommodate the Project's wastewater flows. Further detailed gauging and evaluation would be needed as part of the permit process to identify the specific sewer connection point. If the public sewer is found to have insufficient capacity, then the Project Applicant would be required to build new sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit would be made at that time. During the construction phase of the Project, an application for a sewer connection permit and Sewer Capacity Availability Review (SCAR) must be submitted to the City. The Project Applicant would also pay any required sewer connection fees.

The potential construction of larger capacity sewer lines, or sewer connections, would not result in significant impacts as the construction would be of short duration and would occur with the implementation of best practices, such as the use of a flagman during work within the public right of way, to avoid significantly impacting traffic or emergency access. This is included as Project Design Feature WW-PDF-1.

The Project's 0.103 mgd net increase in wastewater generation over the existing Project Site uses would represent approximately 0.12 percent of the existing remaining capacity at the Hyperion Treatment Plant (HTP). Therefore, the HTP has enough remaining capacity to accommodate the Project.

The wastewater generated by the Project would be similar to that of other existing residential, office, and retail uses in the area. No industrial discharge into the wastewater or drainage system would occur. As HTP complies with the state's wastewater treatment requirements and the Project's wastewater generation is well within the plant's existing capacity, the Project would not exceed the wastewater treatment requirements of LAWQCB. Therefore, no significant impacts with regard to wastewater treatment requirements or treatment plant outflow quality would occur.

Further, the City's implementation of the Sewer Allocation Ordinance assures that sufficient capacity is available at the HTP at the time a building permit is issued by the City for a project. The 0.103 mgd increase in wastewater generation of the Project also represents approximately 2.1 percent of the annual sewage allotment of 5.0 mgd. The Project's additional wastewater flows would not substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or the General Plan and its amendments. Project impacts upon wastewater treatment capacity would therefore be less than significant.

Since Alternative 4 would generate 13,371 gpd less wastewater than the Project, Alternative 4's wastewater impacts would also be less than significant.

No mitigation measures are required, as no significant impacts associated with new water or wastewater treatment facilities have been identified.

Stormwater

The Project would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. The impact would be less than significant. Alternative 4 would also not require new stormwater facilities and its impacts would be less than significant.

Neither Alternative 4 nor the Project would create or contribute to runoff water that would result in the need for any additional storm water drainage facilities. In 2011, the City amended the City's Stormwater Ordinance (LAMC 64.70) and expanded on the City's existing Standard Urban Stormwater Mitigation Plan ("SUSMP") to implement Low Impact Development ("LID"), a storm water management strategy that seeks to prevent impacts of runoff and storm water pollution as close to its source as possible. Since the Project will add more than 500 feet of square feet of impervious area, it must comply with the LID Ordinance, including the LID's Best management Practices as determined on a case by case basis by public works. If the LID's Best Management Practices are not feasible, the City's SUSMP Best Management Practices would apply. The Project would also be required to obtain a National Pollution Discharge Elimination System ("NDPES") water quality permit from the LARWQCB. Further, implementation of appropriate project design features and compliance with local, State, and federal regulations, code requirements, and permit provisions would prevent significant impacts related to the release of potentially polluted discharge into surface water. Construction activities would also be subject to the City's inspection and implementation of storm water Best management Practices. The Project and Alternative 4 would also comply with the California Building Standards Commission requirements for irrigation systems. Based on its compliance with all those requirements, neither Alternative 4 nor the Project would result in construction of new storm water drainage facilities or expansion of existing facilities. Therefore, impacts would be less than significant.

No mitigation measures are required, as no significant impacts associated with new storm drainage facilities or expansion of existing facilities have been identified.

Cumulative Impacts

Neither Alternative 4 nor the Project, in conjunction with the Related Projects, would contribute to a significant cumulatively considerable impact associated with wastewater or stormwater. Therefore, impacts would be less than significant.

Implementation of either Alternative 4 or the Project in conjunction with the Related Projects would increase demand for wastewater services provided by the City's sewer system. The Related Projects within the City are served by the same sewer system as the Project Site, and thus are counted as part of the cumulative analysis.

The cumulative development projects in combination with the Project would generate approximately 9,707,043 gpd (9.71 mgd) of wastewater, with the Project accounting for approximately 1.1 percent of that projected increase in wastewater generation. As with the Project, the cumulative projects would rely on the wastewater treatment services provided by the HTP, as all of the projects are within the service boundaries of the HTP. However, existing wastewater-generating uses at each of the cumulative project sites have not been factored into this analysis. The existing remaining capacity of the HTP is approximately 88 million gpd. The cumulative sewage generation of the Project and the cumulative projects within the surrounding area would be well within the design capacity of the HTP, representing about 11 percent of the remaining capacity. As such, the Project's incremental effect on cumulative impacts to wastewater treatment capacity would not be cumulatively considerable. Since Alternative 4

would generate less wastewater than the Project, Alternative 4 would have similar impacts, which would also be less than significant.

No mitigation measures are required, as no significant cumulative impacts associated with wastewater or storm water drainage have been identified.

Utilities and Service Systems – Water Supplies

Under CEQA's Guidelines (Appendix G), a project would have a significant impact on water if: (a) the project would require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; or (b) there were insufficient water supplies available to serve the Project from existing entitlements and resources, and new or expanded facilities were needed.

Under the L.A. CEQA Thresholds Guide, the determination of impact significance on water must be made on a case-by-case basis, considering the following factors: (a) the total estimated water demand for the project (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing, or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

Water Demand, Supplies, and Infrastructure

Sufficient water supplies are available to serve the Project or Alternative 4 from existing entitlements and resources. Incorporation of Project Design Feature WAT-PDF-1 would ensure that either Alternative 4 or the Project's impacts associated with water infrastructure remain less than significant. Therefore, impacts would be less than significant.

Certain construction activities for the Project would consume water, such as soil watering (i.e. for fugitive dust control), clean up, masonry, painting, and other related activities. Typically, fugitive dust watering is provided by private purveyors and not provided by on-site water sources. Reclaimed water can also be used for dust control. Since the Project's construction would occur in various stages, construction activities would occur intermittently and would be short-term and temporary in nature. Further, the activities requiring water would not create substantial water demand. Overall, construction activities would require minimal water consumption and would not be expected to have adverse impacts on available water supplies or existing water distribution systems.

As part of the building permit process, the City would confirm that there is sufficient capacity in the water supply and infrastructure to accommodate the Project's water needs. If there is a deficiency that would prevent the Project from receiving an adequate level of service, the Project Applicant will fund the required upgrades to adequately serve the Project. To reduce that potential impact, Project Design Features WAT-PDF-1 would facilitate the flow of traffic and reduce those impacts to a less than significant level. Impacts would be less than significant.

Water consumption for the Project was estimated by LADWP in its Water Supply Assessment for the Proposed Project. The Project is estimated to consume a net total of approximately 128,666 gallons per day (gpd) (or 0.129 mgd). This total was reduced by the demand of the existing uses, which would be removed.

The Los Angeles Aqueduct Filtration Plant (LAAFP) currently has the capacity to treat and convey an additional 125 mgd of water. The Project's net increase of 0.129 mgd represents

approximately 0.1 percent of the LAAFP available capacity, and would be accommodated within the LAAFP's existing treatment capacity. The Project's water demand is accounted for in the City's future projected demands. Therefore, the current treatment plant capacity of LAAFP is estimated to be adequate to accommodate future demands. The Project would not require the construction or expansion of new water treatment facilities that could cause a significant environmental effect.

Additionally, given the incremental increase in water consumption for the Project, and compliance with applicable water conservation ordinance and regulations such as California Code of Regulations (CCR), Title 20, Section 1604; CCR Title 22; City Ordinances 165,004 and 166,080; the Project would not require or result in the construction of new water treatment facilities. The 2015 LADWP Urban Water Management Plan takes into account drought conditions. After adjusting for economy and drought conditions, projected water demands can vary by approximately ± 5 percent in any given year due to average historical weather variability. This means that water demands under cool/wet weather conditions could be as much as 5 percent lower than normal demands on average; while water demands under hot/dry weather conditions could be as much as 5 percent higher than normal demands on average. Therefore, the Project's anticipated operational water demand would be considered to have a less than significant impact.

The Los Angeles Department of Water and Power (LADWP) Board of Commissioners approved a Water Supply Assessment for the Project. The WSA anticipated that the maximum 144.14 AF per year of total additional annual water demanded from the Project would fall within the UWMP's projected water supplies for normal, single-dry and multiple-dry years through the year 2040 and falls within the UWMP's 25-year water demand growth projection. Therefore, the Project is consistent with the 2015 UWMP, and a less than significant impact would occur with respect to City water supplies.

The Project Applicant has committed to include a number of water conserving features in the design of the Project in addition to those required under applicable City ordinances. These features are included as Project Design Feature WAT-PDF-2. In addition, the Project would be required to comply with the City of Los Angeles Low Impact Development Ordinance (City Ordinance No. 181,899) and to implement Best Management Practices that have stormwater recharge or reuse benefits for the Project (as applicable).

Since Alternative 4 would generate 17,182 gpd less water demand than the Proposed Project, Alternative 4's impact to water supplies and infrastructure would also be less than significant.

No mitigation measures are required, as no significant impacts associated with impacts to water demand, supply, or infrastructure have been identified.

Project Design Feature

WAT-PDF-1 – In the event of full or partial public street closures, such as during the construction of new water lines, the Construction Traffic Management Plan shall be implemented.

WAT-PDF-2 – The Project design shall include, at a minimum, the water conserving features identified in Table II (on page 9) of the Water Supply Assessment prepared by LADWP for the Project.

Alternative 4 would incorporate these Project Design Features.

Fireflow

The Project would not have significant impacts to the water conveyance system for fireflows. The impact would be less than significant. Alternative 4 would also have less than significant impacts.

The Project design includes design features to increase the capacity of existing water infrastructure in accordance with LADWP standards, which take into account LAFD fire flow and pressure requirements. Furthermore, the Water Operations Division of the LADWP would perform a detailed fire flow study at the time of permit review in order to ascertain whether further water system or site-specific improvements would be necessary. Hydrants, water lines, and water tanks would be installed per Fire Code requirements for the Project. In addition, the Project Applicant would be required to submit the proposed plot plans for the Project to the LAFD for review for compliance with applicable Los Angeles Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, thereby ensuring that the Project would not create any undue fire hazard. For the same reasons, since Alternative 4 would include the same design features and comply with the same regulations, Alternative 4 would also not result in any significant impacts.

No mitigation measures are required, as no significant impacts associated with the water conveyance system for water flows have been identified.

Cumulative Impacts

Neither Alternative 4 nor the Project, in conjunction with the Related Projects, would contribute to a significant cumulatively considerable impact associated with water supplies. Therefore, impacts would be less than significant.

Implementation of either Alternative 4 or the Project in conjunction with the Related Projects would increase demand for water services provided by the City's water supply system. The Related Projects within the City are served by the same system as the Project Site (LADWP), and thus are counted as part of the cumulative analysis. For a conservative analysis, the City analyzed all of the Related Projects. Based on a cumulative estimated water demand, the Related Projects in the City in combination with the Project would demand approximately 11,653,400 gpd (11.7 mgd) of water, with the Project accounting for approximately 1.1 percent of that projected increase in water demand.

Through its UWMP, the LADWP anticipates its projected water supplies will meet demand through the year 2040, including anticipated growth projections and demographic changes. In terms of the City's overall water supply condition, the water requirement for any Related Project that is consistent with the City's' General Plan has been accounted for in the planned growth of the City's water system. Additionally, any Related Project that conforms to the demographic projections from SCAG's Regional Transportation Plan ("RTP") and is located in the service area is considered to have been included in LADWP's water supply planning efforts. Therefore, projected water supplies would meet projected demands. Similar to the Project, each Related Project would also be required to comply with City and state water code and conservation programs for both water supply and infrastructure. All Related Projects would also comply with the Governor's Executive Order on drought conditions. Further, each of the Related Projects is required to be consistent with the SCAG RTP projections in order to be accounted for the City's 2010 Urban Water Management Plan's current and projected available water demands. As the Related Projects must be consistent with and accounted for in those projections, no significant cumulative water supply impact is anticipated from development of the Project and the Related Projects, and the LAAFP would have adequate capacity to treat the cumulative water demand from the Project and Related Projects.

In addition, the potential need for the Related Projects to upgrade water lines to accommodate their water needs is site-specific and there is little, if any, relationship between development of the Project and the Related Projects in relation to this issue. Therefore, no cumulative water infrastructure impacts or water treatment facilities impacts are anticipated for the development of the Project and the Related Projects. Also, Citywide water conservation efforts would be expected to partially offset the cumulative demand for water. For example, LADWP undertakes expansion or modification of water services infrastructure to serve future growth in the City as required in the normal process of providing water service. For all of those reasons, the Project would not contribute to a cumulatively considerable effect on water service and supply. Therefore, the cumulative impacts of the Related Projects in combination with the Project would be less than significant. Since Alternative 4 would generate less water demand than the Project, it also would not cause a significant cumulative impact.

No mitigation measures are required, as no significant cumulative impacts associated with water service and supply have been identified.

Utilities and Service Systems – Solid Waste

Under CEQA's Guidelines (Appendix G), a project could have a significant environmental impact if the project would result in the following: (a) be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs; or (b) an impact related to compliance with federal, state, and local statutes and regulations related to solid waste.

Under the City's CEQA Thresholds Guide, a determination of significance relative to solid waste and infrastructure shall be made on a case-by-case basis, considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for an additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objects in the City's Source Reduction and Recycling Element ("SRRE") or its updates, the City Solid Waste Management Policy Plan ("CiSWMPP"), Framework Element or Curbside Recycling Program, including consideration of the land-use specific waste diversion goals contained in Volume 4 of the SRRE.

Construction

The Project would be served by landfills with sufficient permitted capacity to accommodate the solid waste disposal needs from the Project's construction. The impact would be less than significant. Alternative 4 would also have less than significant impacts.

During the 30 month construction period, Project demolition and construction activities would generate an average of approximately 9.17 tons per day of construction waste. The Project's demolition and construction debris would primarily be classified as inert waste and would be recycled in accordance with the California Green Building Standards Code, which requires 50 percent of C&D debris be recycled, as well as the LAMC Section 66.32 which requires 70 percent of solid waste (including C&D debris) generated in the City to be recycled.

Assuming a 70 percent diversion/recycling rate, the development of the Project would result in the generation of 2,476 tons of construction waste, with an average of 2.75 tons per day over the Project buildout. The remaining waste would be disposed of in a Class III landfill or a mixed debris recycling facility. The projected total amount of daily Project construction waste (after diversion) would equate to 0.008 percent of the combined existing daily intake of the available landfills.

Thus, as existing landfills and waste facilities have sufficient capacity to handle the Project's amount of construction waste, construction related solid waste impacts would be less than significant. Since Alternative 4 would generate the same amount of solid waste during construction, its impacts would also be less than significant.

No mitigation measures are required, as no significant impacts associated with solid waste from construction have been identified.

Operation

The Project would be served by landfills with sufficient permitted capacity to accommodate the solid waste disposal needs from the Project's operations. Therefore, this impact would be less than significant. Alternative 4 would also be served by landfills with sufficient permitted capacity and would have less than significant impacts.

The Project is estimated to generate a net total of approximately 7,184 pounds per day of solid waste. This total is a conservative, worst-case scenario and does not account for the effectiveness of the recycling efforts that the Project would implement. The Project would be required to provide adequate space for disposing of recyclable materials. While landfills have a finite amount of space, proposals for expansions of existing landfills, the opening of new facilities, and the development of new waste disposal technologies would facilitate solid waste disposal facilities and other waste management options to continue to be available to the Project. Thus, solid waste generated during operation of the Project would result in a less than significant impact.

The City is served by the Sunshine Canyon City/County Landfill and the Chiquita Canyon Landfill. The Sunshine Canyon Landfill currently accepts 9,000 tpd on weekdays and 3,000 tpd on Saturday, but can accept 12,100 tpd. Therefore, the Sunshine Canyon City Landfill could accommodate the additional estimated 8.76 tons per day increase in solid waste resulting from the Project's operation.

Additionally, pursuant to AB 939, each city and county in the state must divert 50% of its solid waste from landfill disposal through source reduction, recycling, and composting. The City achieved a waste diversion rate of 76.40 percent in FY 2013 and is on track toward its goal to achieve a 90 percent diversion by 2025.

The Project would be served by landfills with sufficient permitted capacity to accommodate the Project's solid waste disposal needs and would not require an additional solid waste collection route or recycling or disposal facility. Operation of the Project would not require the need for additional solid waste facilities, the construction of which could cause significant environmental effects or substantially or incrementally exceed the future scheduled capacity of any landfill. Further the Project would comply with existing regulations for solid waste recycling and diversion. Operational solid waste impacts would be less than significant for the Project.

Since Alternative 4 would generate 1,129 fewer pounds solid waste than the Project, its solid waste impacts would also be less than significant.

Mitigation Measures. No mitigation measures are required, as no significant impacts associated with solid waste have been identified.

Cumulative Impacts

Neither Alternative 4 nor the Proposed Project, in conjunction with Related Projects, would contribute to a significant cumulatively considerable impact associated with solid waste.

Implementation of either Alternative 4 or the Project in conjunction with the Related Projects would increase solid waste generation. All of the Related Projects are served by the same landfills as the Project (Puente Hills MRF and Sunshine Canyon). The Related Projects in combination with the Project would generate approximately 309,178,000 pounds (or 154,589 tons) of construction solid waste, with the Project accounting for approximately 5.3 percent of that projected increase in construction solid waste generation. It is reasonable to assume that cumulative construction of the Related Projects could happen over two years (at a minimum, given the sizes of some of the larger projects). The total square footage of all the related projects was added together and multiplied by a solid waste generation factor. The total tons were then divided by a reasonable number of working days over a two-year period. Using that calculation, construction would generate approximately 322 tons per day of cumulative construction waste. The landfills would have adequate capacity to accept the cumulative project's construction waste. The cumulative construction debris generated by the Project combined with the Related Projects would constitute a small percentage of remaining inert landfill capacity. Therefore, cumulative impacts related to disposal of demolition and construction debris would not be cumulatively considerable.

With respect to operation, the Related Projects in combination with the Project would generate approximately 762,040 pounds (381.02 tons) of solid waste per day, with the Project accounting for approximately 0.94 percent of that projected amount. Similar to the Project, the Related Projects would participate in regional source reduction and recycling programs pursuant to AB 939, further reducing the amount of solid waste to be disposed of at the landfills serving the City. Related Projects would also be required to participate in recycling programs, thus reducing the amount of solid waste to be disposed of at the landfills servicing the City. To provide a conservative estimate, the City assumed that all solid waste generated by the Related Projects would be delivered to the Sunshine Canyon Landfill, which can accommodate the additional daily increase in solid waste resulting from the cumulative projects.

The County has also supported State legislation that encourages the development of waste conversion technologies (i.e. AB 1939 in 2000 and AB 2770 in 2002). The ongoing process of improving solid waste facilities and advancing disposal techniques and strategies would further minimize the already less than significant impact on cumulative solid waste generation and disposal. The Related Projects would also act to implement the applicable City and County Waste diversion goals and policies, including the City's Solid Waste Management Policy Plan, the Source Reduction Recycling Element, the Framework Element, the Solid Resources Infrastructure Strategy Facilities Plan, the City's Municipal Code, and the County's Integrated Waste Management Plan, and Source Reduction Recycling Element.

For all of those reasons, cumulative impacts associated with solid waste will be less than significant for the Project. Since Alternative 4 would generate less solid waste, its cumulative impacts would also be less than significant.

No mitigation measures are required, as no significant cumulative impacts associated with solid waste have been identified.

Utilities and Service Systems – Energy Conservation

Under CEQA's Guidelines (Appendix F), an EIR should include the following: (a) the project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed; (b) the effects of the project on local and regional energy supplies and on requirements for additional capacity; (c) the effects of the project on peak and base period demands for electricity and other forms of energy; (d) the degree to which the project complies with existing energy standards; (e) the effects of the

project on energy resources; and (f) the project's protected transportation energy use requirements and its overall use of efficient transportation alternatives.

Under the City's CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following: (a) the extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities; (b) whether and when the needed infrastructure was anticipated by adopted plans; and (c) the degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements. Based on those factors, a project would have a significant impact if: (i) the project would result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capacities; or (ii) the design of the project fails to incorporate energy conservation measures that go beyond existing requirements.

Construction

The Project's construction would not require new energy supply facilities; would not lead to wasteful, inefficient, or unnecessary consumption of energy; would comply with all applicable energy conservation measures; and would incorporate energy conservation measures. Impacts related to energy conservation and energy resources from the Project's construction would be less than significant, as would the impacts from Alternative 4.

The Project's demolition, site clearing, grading, excavation, and trenching would last for approximately five months. Heavy-duty construction equipment associated with these activities would include diesel fuel haul trucks, excavators, skid steer loaders, tractors, and water trucks. It is estimated that up to 376 haul truck trips per day would be required to haul the material to off-site reuse and disposal facilities. The Project would require the use of haul trucks with double trailers to increase the overall average capacity per trip, which would minimize the total number of trips and fuel required to transport the debris. Heavy-duty construction equipment associated with building construction would include air compressors, concrete pumps, forklifts, lifts, and welders. Heavy-duty construction equipment associated with outdoor hardscape and landscaping would include air compressors, backhoes, dozers, forklifts, lifts, loaders, and rollers. The majority of the equipment will likely be diesel-fuels; however, smaller equipment such as air compressors and lifts may be electric-, gas-, or natural-gas fuels. Construction equipment fuels (diesel, gas, or natural gas) would be provided by local regional suppliers and vendors. The transportation fuel required by construction workers would depend on the total number of worker trips estimated for the duration of construction activity. Assuming construction worker vehicles have an average fuel economy consistent with a Caltrans study, based on the maximum projected number of workers during each phase, the Project would use approximately 50,031 gallons of gasoline and 97,378 gallons of diesel, assuming heavy-duty construction equipment (such as haul route trucks) is primarily diesel-fueled. This would represent 0.00035 percent of the statewide gasoline consumption and 0.0037 percent of the statewide diesel consumption. The expected construction gasoline and diesel fuel gas for the Project would be negligible compared with statewide supplies and would be accommodated by local or regional suppliers and vendors. Therefore, gas impacts during construction would be less than significant.

The Project would have short-term construction impacts, as construction activities would consume relatively minor quantities of electricity, including temporary use of lighting and small power tools. These tools and lighting would be powered with charging stations supplied by portable generators. There would be no use of any permanent infrastructure for the delivery of electricity until after construction of the buildings. The electrical demand generated by these tools and lighting is substantially less than the Project's operational demand. Electricity for the Project's construction, when needed, would be supplied by the local utility provider (LADWP) via

existing on-site connections. This would be consistent with suggested measures in the City's CEQA Thresholds Guide to reduce air pollution by using electricity from power poles rather than from temporary diesel or gasoline powered generators. Electricity used to provide temporary power for lighting and electronic equipment (e.g., computers, etc.) inside temporary construction trailers and for lighting when necessary for general construction and renovation activity would generally not result in a net increase in on-site electricity use over existing conditions since the Project Site is occupied. Therefore, electricity impacts during construction would be less than significant.

Further, the Project would use construction contractors who demonstrate compliance with applicable California Air Resources Board ("CARB") regulations governing the accelerated retrofitting, reporting, or replacement of heavy-duty diesel on- and off-road equipment. Compliance with CARB's anti-idling and emission regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy.

Since the construction of Alternative 4 would be carried out in a similar fashion to the Project, its energy impact during construction would also be less than significant.

No mitigation measures are required, as no significant impacts associated with energy conservation have been identified from the Project's construction.

Operation

The Project's operation would not require new energy supply facilities; would not lead to wasteful, inefficient, or unnecessary consumption of energy; would comply with all applicable energy conservation measures; and would incorporate energy conservation measures. Impacts related to energy conservation and energy resources from the Project's operation would be less than significant, as would impacts from Alternative 4.

For the Project's electricity demands, electrical conduits, wiring, and associated infrastructure would be conveyed to the Project from existing LADWP lines in the surrounding streets to the Project during construction. The Project would likely require transformer vaults, which are common for buildings of its size. However, construction of those vaults is part of the overall building construction and would not constitute unusual or unplanned infrastructure that would cause a significant impact on the environment. The Project would demand approximately 5,539,170 kWh per year. The Project's annual electricity consumption would represent approximately 0.009 percent of the forecasted electricity demand in 2020-2021. Thus, the Project is within the anticipated demand of the LADWP system. Further, the Project's estimated electricity consumption is based on usage rates that do not account for the Project's energy conservation features or updates to the Los Angeles Building Code. This represents a conservative, worst-case scenario approach, as the actual electricity consumption from the Project would likely be lower than forecasted. LADWP's current and planned electricity supplies would be sufficient to support the Project's electricity consumption. The Project would be in compliance with Title 24 of the California Code of Regulations (Calgreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code. Electrical service would be provided in accordance with LADWP's Rules Governing Water and Electric Service. Based on the above analysis, no operational impacts associated with the consumption of electricity would occur.

The Project is estimated to demand approximately 10,576,050 cubic feet/year of natural gas. The total was reduced by the demand of existing uses, which would be removed. The Project's natural gas demand would represent approximately 0.005 percent of Southern California Gas Company's peak demand in 2020. As such, there is adequate supply capacity and no impacts.

Further, the Project would be responsible for paying connection costs to connect its on-site service meters to existing infrastructure. The Project would not result in the construction of natural gas facilities (i.e., natural gas distribution lines) that would cause significant environmental impacts. Project design features for building efficiency would also help alleviate natural gas demand. Therefore, the Project would not lead to impacts on natural gas infrastructure and Project impacts related to natural gas would be less than significant.

The Project would also not lead to wasteful, inefficient, or unnecessary consumption of transportation energy. The Project's location takes advantage of existing transportation alternatives in the vicinity that could reduce energy (gasoline, electric, or natural gas, depending on the mode of travel). The Metro Red Line Little Tokyo/Arts District Station is 0.7 mile from the Project Site. Additionally, a number of Metro and LADOT bus routes are within reasonable walking distance (less than one-quarter mile) of the Project Site. As such, the Project Site is located in proximity to numerous Metro bus routes, thereby providing access for employees, patrons, and residents. These services provide an alternative to driving individual vehicles both into the Project Site from the surrounding areas as well as for residents, guests, and visitors at the Project Site to travel to surrounding areas. Project-related vehicles would require a negligible fraction of the state's total transportation fuel consumption. With compliance with regulatory measures, the Project's operations would not result in wasteful, inefficient, or unnecessary consumption of transportation energy.

The Project's potential to use energy provided by alternative resources to meet the Project's operational demands is constrained by the energy portfolio mix managed by the Los Angeles Department of Water and Power ("LADWP", the Project's service provider) and by limitations on the availability or feasibility of on-site energy generation. LADWP has committed to meetings the requirements under the California Renewable Energy Resources Act by procuring at least 33 percent of its renewable energy portfolio from renewable sources by 2020 from by the procurement of energy from eligible renewable resources to the extent permitted by fiscal constraints, renewable energy pricing, system integration limits, and transmission constraints. LADWP's existing renewable energy resources included small hydro, wind, solar, and biogas, which accounted for 20 percent of its overall energy mix. This represents the available off-site renewable sources of energy that would meet the Project's demand. With respect to on-site renewable energy sources, due to the Project's location, there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydro, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Geothermal energy requires the installation of a heat exchanger consisting of a network of below-ground pipes to convey heated or cooled air into a building. Methane can be a renewable derived biogas, but it is not available on the Project Site in commercially viable quantities or form, and its extraction and treatment for energy purposes would result in secondary impacts. Methane is also currently regulated as a hazardous material by the City. Solar and wind power could be used to augment, but not replace, natural gas-fired energy power generation. However, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. The Project Site was not identified in a study by the California Energy Commission as an area with wind resource potential. Also, there are no viable sites within the Project Site for placement and operation of a wind turbine. With respect to solar energy, the California Energy Commission determined Los Angeles County has a relatively high photovoltaic potential. However, most of the high potential areas in Los Angeles County are located in the northeastern corner of the County, approximately 65 miles from the Project Site. Additionally, the California Energy Commission determined inland counties are more suitable for large-scale solar power generation.

Since Alternative 4 would incorporate the same project design features as the Project, use less electricity than the Project, and comply with all codes and regulations, Alternative 4's impacts would be less than significant.

No mitigation measures are required, as no significant impacts associated with energy conservation have been identified from the Project's operation. However, Project Design Feature EN-PDF-1 shall be required so the Project's impacts associated with energy conservation remain less than significant.

Project Design Feature

EN-PDF-1 – The Project shall use Energy Star appliances where available.

Alternative 4 shall comply with this Project Design Feature.

Cumulative Impacts

Neither Alternative 4 nor the Project, in conjunction with Related Projects, would contribute to a significant cumulatively considerable impact associated with energy conservation.

The Project in conjunction with the Related Projects would increase demand for electricity. CalEEMod model runs are not available for each related project, thus, a more macro approach to cumulative projected impacts is discussed. Overall, LADWP estimates that electricity demand in 2021-22 to be roughly 5,718 MW of electricity. The Project would account for roughly 0.09 percent of the forecasted demand in the City. Although future development would result in the use of renewable and non-renewable energy during Project construction and operation, the use of such resources would be generally consistent with the growth expectations for the LADWP service area. Each Related Project would also be required to comply with Title 24 of the California Code of Regulations ("CalGreen") requiring building energy efficiency standards and would be in compliance with the City's Green Building Code. Further, each project would need to be consistent with how the LADWP serves each location with its existing distribution infrastructure. Thus, the cumulative projects are within the anticipated demand of the LADWP system and, accordingly, there is adequate energy capacity to service the Project and the cumulative projects. Therefore, cumulative impacts would be less than significant.

Implementation of the Proposed Project in conjunction with the Related Projects would also increase demand for natural gas. It should be noted that CalEEMod model runs are not available for each related project. As mentioned above, the SCG retail core peak day demand in 2020 (the expected year of Project completion) is forecasted at 2,899 million cf/day. The Project's 0.27 million cf/day represents approximately 0.005 percent of the expected 2020 peak demand. These forecasts consider projected population growth and development based on local and regional plans. Although future development projects would result in the irreversible use of natural gas resources which could limit future availability, the use of such resources would be consistent with regional and local growth expectations for SoCalGas's service area.

Also, forecasted growth would incorporate design features and energy conservation measures, as required by Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code, which would reduce the impact on natural gas demand. It is also anticipated that future developments would upgrade distribution facilities, commensurate with their demand, in accordance with all established policies and procedures. There would be sufficient statewide supplies to accommodate the statewide requirements from 2020-2035. Therefore, cumulative impacts would be less than significant.

For these same reasons and because its electricity usage would be less than the Project, Alternative 4 would also result in less than significant cumulative impacts.

No mitigation measures are required, as no significant cumulative impacts associated with energy conservation have been identified.

1.0 NO IMPACT OR LESS THAN SIGNIFICANT IMPACTS WITHOUT MITIGATION

Impacts of the Project and Alternative 4 that were determined to have no impact or be less than significant in the EIR (including having a less than significant impact as a result of implementation of project design features and regulatory compliance measures) and that require no mitigation are identified below. The City has reviewed the record and agrees with the conclusion that the following environmental issues would not be significantly affected by the Project and therefore, no additional findings are needed.

These findings do not repeat the full discussions of environmental impacts contained in the EIR. The City ratifies, adopts, and incorporates the analysis, explanation, findings, responses to comments, and conclusions of the EIR. The City adopts the reasoning of the EIR, City staff reports, and presentations regarding the Project.

Aesthetics

Under CEQA's Guidelines (Appendix G), a project could have a potentially significant impact related to aesthetics if it were to: (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; or (c) substantially degrade the existing visual character or quality of the site and is surroundings.

Under the L.A. CEQA Thresholds Guide, the determination of significance for the Project's impacts on visual resources and views shall be made on a case-by-case basis, considering factors related to visual resources and views.

Senate Bill (SB) 743, effective January 1, 2014, amended CEQA to provide that aesthetic impacts of mixed-use projects on an urban infill site within a transit priority area "shall not be considered significant impacts on the environment." On February 10, 2016, the City circulated Zoning Information File No. 2451 to clarify the locations of Transit Priority Areas within the City, and reaffirm that aesthetic impacts shall not be considered a significant impact on the environment when the provisions of SB 743 apply. The Project Site is located on an infill site, is a mixed-use project, and is located in a Transit Priority Area because it is within 0.5 mile of the intersection of Metro Bus Routes 18 and 60 at 7th Street and Alameda Street, which is defined as a Major Transit Stop. Accordingly, the Project's and Alternative 4's aesthetic impacts (including views, shade and shadow, and light and glare) are not considered significant because aesthetic impacts in transit priority areas are no longer considered to be an impact under CEQA. However, solely for informational purposes, this section provides an analysis of impacts and evaluates those impacts against the City's significance thresholds for such impacts applicable to areas of the City not designated as a transit priority areas.

Scenic Vistas

The Proposed Project's impacts with respect to scenic vistas would be less than significant. Alternative 4 would also have less than significant impacts. While the Project would increase building heights on the Project Site when compared to existing conditions, it would not substantially affect existing scenic vistas available from the 4th Street Bridge as there are no dominant visual features that would be obscured by development of the Project when viewed

from this location. The Project Site and surrounding area are characterized by dense urban development. Due to existing industrial buildings, views toward the San Gabriel Mountains and Elysian Hills/Mount Washington to the north are currently partially obstructed. Views of the Los Angeles River are not available from the Project Site due to its placement within a flood control channel and development of the Project would not affect views of the river from the 4th Street Bridge. Therefore, no impact with respect to scenic vistas would occur with development of the Project.

Although Alternative 4 would construct a taller building than the Proposed Project, it would still not affect scenic vistas or views of the River. Therefore, Alternative 4's impacts to scenic vistas would be less than significant. No mitigation measures are required, as no significant impacts associated with scenic vistas have been identified.

Scenic Resources

The Proposed Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. Therefore, no impact would occur. Nor would Alternative 4 cause such an impact for the same reasons.

A project may have a significant impact on scenic resources if the project would damage or remove scenic resources. The Project Site does not contain trees with scenic significance or rock outcroppings and is not located within a state scenic highway according to the California Scenic Highway Mapping System for Los Angeles County. In addition, no nearby scenic resources would be damages or removed by the Project. Therefore, as no scenic resources would be damaged or removed by the Project, no impact would occur with respect to a scenic resource. Similarly, Alternative 4 would cause no such impacts since it would not damage or remove any scenic resource. No mitigation measures are required because no significant impacts associated with scenic resources have been identified.

Visual Character of the Project Site During Construction

No impacts associated with visual character would occur during the construction of the Proposed Project or Alternative 4.

Construction activities at the Project Site associated with either the Proposed Project or Alternative 4 would be mostly visible from the surrounding uses, and are estimated to occur over approximately 30 months. Construction would involve three basic activities: (1) demolition, (2) excavation and grading, and (3) building construction. Construction activity would vary on a weekly basis, depending largely on the number of workers and construction trucks needed for the activities during each time period. Temporary fencing would be installed around the Project Site during construction, which would partially shield views of construction activities and equipment. Though construction activities under the Project would be visible from adjacent public and private vantage points, changes to the appearance of the Project Site would be temporary in nature. Temporary construction changes are necessary for the development of the Site and would not rise to the level of a change that would substantially degrade the existing visual character. Therefore, no significant aesthetic impacts would occur during construction of either the Proposed Project or Alternative 4. Alternative 4's impacts would be substantially similar and less than significant. No mitigation measures are required because no significant impacts associated with visual character of the Project Site during construction have been identified.

Visual Character of the Project's Design

Impacts to visual character of the design of either the Proposed Project or Alternative 4 would be less than significant. Under the L.A. CEQA Thresholds Guide, there are no aesthetic standards that apply to all areas of the City given the size and diversity of the City, including an extraordinary range of aesthetic characteristics and contrasts. The L.A. CEQA Thresholds Guide defers to the LAMC, community plans, and other applicable local land use plans for specific guidelines and requirements related to aesthetics. Under the L.A. CEQA Thresholds Guide, aesthetic impact assessments should generally address the issue of visual contrast, or the degree to which elements of the environment differ visually. The L.A. CEQA Thresholds Guide also states that a degree of discretionary judgment may be required to determine the "value" of an aesthetic resource and potential project impacts.

With respect to architecture, both the Project and Alternative 4 would be designed in a modern architectural style, with articulated building facades and accent colors to provide visual interest. Building materials would be complementary and appropriate to the scale of the Project and adjacent existing buildings. Building materials such as metal panels, glass curtain walls, spandrel glass, stucco, stone veneer, perforated metal, and tile, which provide a rich texture to the buildings, enhancing a modern approach. Compliance with the design features listed below will provide further guidance to ensure variations in façade treatment and the use of high quality materials that add scale, texture, and variety. All mechanical and electrical equipment that is located on rooftops would be screened from public view. Areas of landscaping, outdoor plaza space, and other amenities would provide visual breaks in the view of the project buildings from Mateo Street and Santa Fe Avenue. Pedestrian-oriented paseos would be located on both the north and south sides of the Project Site, with the latter paseo activating a passageway between Mateo Street and Santa Fe Avenue providing access to various retail and restaurant uses. Overall, both the Project and Alternative 4 would result in less than significant impact with respect to architectural design.

Although no buildings in the vicinity are of a comparable height as the Project or Alternative 4, several proposals have been submitted to the City, including projects with 58-story towers and buildings 30 stories in height. The massing of the Project buildings would be softened by varying façade relief and would include landscaping to provide a visual break between the buildings. The principal difference in the bulk and visual massing associated with Alternative 4 as compared to the Proposed Project would rest in its perception from the Mateo Street streetscape adjacent to the Project Site on the west. Existing residential uses border this side of the site. The overall bulk of the building would be slimmer with Alternative 4 than with the Proposed Project, which would spread out the building's bulk horizontally across the entire site. Landscaping along the street edge would aid in softening this building frontage.

On the other hand, viewers from Santa Fe Avenue and 4th Street Bridge would perceive Alternative 4 as a high-rise structure. While this would also be true with the Proposed Project, it would be more so with the taller structure contemplated under Alternative 4. Even so, the application of the proposed design elements of the building's façade would work together to create a unified design. The use of recessed windows and open form structure would provide visual interest, and these architectural features would enhance the visual appeal of the proposed building and articulate the skyline when the structure is viewed from a distance. These materials and design features would create visual interest both vertically and horizontally on all building facades, further serving to break up visual massing.

Both Alternative 4 and the Project propose the creation of new live/work units and productive space designed to preserve the surrounding industrial and artistic character by mixing the typical industrial spaces with new productive uses. Considering the existing visual character of the Project Site and the continuing transformation of the surrounding Arts District, the architectural detail, building configuration, and design that would be constructed with development of the Project or Alternative 4, the height and massing would not be considered as

detracting from the existing style or image of the area. Overall, development of the Project or Alternative 4 would result in less than significant impacts with respect to height and massing.

Under either Alternative 4 or the Proposed Project, extensive landscaped areas along the pedestrian paseo at the southern boundary of the Project Site, shaded walking paths, seating areas, other common gathering areas, as well as seating, communal tables and public art, would be provided. Outdoor courtyards and open space amenities that would include outdoor gathering and recreation areas such as a pool, spa, lounge, greenhouse, and barbecue for those working and living on-site would also be provided. On the rooftop level, amenities would include a pool, urban garden, lounge, petanque court, and sunset deck. In sum, the proposed landscaping and open space would complement the visual character of the Project Site and surrounding area, and no impacts would occur.

Because redevelopment of a site located in the River Improvement Overlay (RIO) District, it will need to obtain administrative clearance from the Department of City Planning illustrating compliance with the RIO landscaping and design standards. The landscaping proposed for the Project and Alternative 4 has been designed to comply with the design standards identified in the RIO.

No mitigation measures are required because impacts to visual character will be less than significant.

Views and Viewsheds

The Proposed Project's impacts to views and viewsheds would be less than significant. Alternative 4 would also have less than significant impacts to views and viewsheds. No officially designated or eligible State- or City-designated scenic highways are located adjacent to, or within view of, the Project Site. Furthermore, the Project Site and the surrounding area are characterized by dense urban development, and no views would be significantly changes or obstructed. Both the Project and Alternative 4 would be consistent with the policies contained in the Central City North Community Plan and also the design policies contained in Chapter V. of the Community Plan related to multi-family residential and commercial uses. As such, neither the Project nor Alternative 4 would result in any significant impact related to applicable policies and regulations relating to aesthetics or views. No mitigation measures are required because no significant impacts associated with views and viewsheds have been identified. The following Project Design Features would reduce impacts:

Project Design Features

AES-PDF-1 – All mechanical and electrical equipment that is located on the rooftops would be screened from public view.

AES-PDF-3 – Utility equipment would be placed underground, screened from public view, or incorporated into the design of the Project.

Alternative 4 would comply with these Project Design Features.

Shade and Shadows

The Proposed Project would not lead to impacts with respect to shading or shadows. Nor would Alternative 4 lead to any such significant impacts. The Project Site is located on an infill site, is a mixed-use project, and is located in a Transit Priority Area. Accordingly, aesthetic impacts are not considered significant because in accordance with SB 743 aesthetic impacts in transit priority areas are no longer considered to be an impact under CEQA. However, solely for

informational purposes, this section provides an analysis of impacts to shading and shadows and evaluates those impacts against the City's significance thresholds for such impacts applicable to areas of the City not designated as a transit priority area.

Under the L.A. CEQA Thresholds Guide, a project may have a significant shadow impact if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time (between October and early April) or for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time (between early April and late October). Shadow effects are dependent on several factors, including local topography, the height and bulk of a project's structural elements, sensitivity of surrounding uses, season, and duration of shadow projection. In determining the effects of shading, the locations of sensitive uses (such as residential uses and recreational areas) in the surrounding area are identified and the shading effects are considered according to standard criteria. Impacts are determined according to the proposed building heights and the distance from the light obstructing structures to the sensitive uses.

For the Project's summer shadows, no sensitive uses would be shaded for more than four hours between the hours of 9:00 AM and 5:00 PM. For the spring/fall shadows, no sensitive uses would be shaded for more than four hours between the hours of 8:00 AM and 4:00 PM. For the Project's winter shadows, no sensitive uses would be shaded for more than three hours between the hours of 9:00 AM and 3:00 PM. As such, the Project would have no impacts with respect to summer shadows, shadows during the spring and fall equinox, or with respect to winter shadows.
With respect to cumulative impacts, the Proposed Project would fully shade Cumulative Project No. 86 during the winter solstice, but would only provide minimal shading on the summer solstice. Restaurant uses are not typically considered shade sensitive, with the exception of any outdoor dining areas that may be included in the cumulative project. Since it is unknown whether or not exterior dining spaces are to be included as part of Cumulative Project No. 86, or whether such spaces would be in use during the wintertime, it cannot be determined whether or not the Proposed Project would create a significant shadow impact at this location. However, in the event that this project would include an outdoor dining area that would be in use on a year-round basis, it can be assumed that the Proposed Project would cast shadows onto this sensitive use in excess of the City's wintertime three-hour threshold. However, since the Proposed Project falls within the applicable definitions in SB 743, the Project's shading impacts at this location would not be considered significant and no mitigation would be required.

Overall, the summer and winter shading impacts of Alternative 4 would affect neighboring shade-sensitive land uses to a greater degree than with the Proposed Project, but Alternative 4 would still not exceed the City's significance thresholds. No mitigation measures are required because no significant impacts associated with shadows have been identified.

Nighttime Light and Daytime Glare

Incorporation of Project Design Features would ensure that potential impacts to nighttime light remain less than significant. Impacts related to nighttime light would be less than significant. Alternative 4 would also have less than significant impacts. Senate Bill (SB) 743, effective January 1, 2014, amended CEQA to provide that aesthetic impacts of mixed-use projects on an urban infill site within a transit priority area "shall not be considered significant impacts on the environment." The City circulated Zoning Information File No. 2451 to clarify the locations of Transit Priority Areas within the City, and reaffirm that aesthetic impacts shall not be considered a significant impact on the environment when the provisions of SB 743 apply. The Project Site is located on an infill site, is a mixed-use project, and is located in a Transit Priority. Accordingly, aesthetic impacts are not considered significant because aesthetic impacts in transit priority areas are no longer considered to be an impact under CEQA. However, solely for informational

purposes, this section provides an analysis of impacts to light and glare and evaluates those impacts against the City's significance thresholds for such impacts applicable to areas of the City not designated as a transit priority area.

Under the CEQA Guidelines, a project could have a significant impact related to light and glare if it would create a new source of substantial light or glare which would adversely affect the day or nighttime views the area. Under the L.A. City CEQA Thresholds Guide, a project's potential impacts related to light and glare should be made on a case-by-case basis considering the following two factors: (1) the change in ambient illumination levels as a result of project sources; and (2) the extent to which project lighting would spill off the project site and affect adjacent light-sensitive areas.

As Project Design Features, the Project would include lighting designed to highlight architectural elements of the structure. Security lighting would be installed to deter criminal activity on the Project Site. The lights associated with the Project would be directed toward the interior of the Project Site so as not to create impacts to surrounding land uses or motorists traveling on surrounding roadways. All exterior lighting would be designed with internal and/or external glare control and would also be designed, arranged, directed, or shielded to contain direct illumination on-site, thereby preventing exceed illumination and light spillover onto adjacent land uses and/or roadways (see also Project Design Feature AES-PDF-4). Blinking, flashing, or oscillating lights would be prohibited. As such, the potential impact resulting from lighting associated with architectural elements, security, and signage would be less than significant and no mitigation is required.

Due to its scale in relation to existing development in the Project vicinity, light generated from the interior of the proposed building could potentially be seen from substantial distances from the Project Site. However, the increase in light that would be generated would not be out-of-character with the existing light sources in the Project vicinity. Furthermore, it is anticipated that the light generated from the Project would not be bright enough to affect the nearby residences. Per the Project Design Features, the exterior of the proposed building would be articulated and constructed of materials such as metal, concrete, and glass with low-reflectivity, which would not be expected to affect daytime views. The Project's sources of glare that would be introduced into the Project area would not result in hazardous conditions to motorists or result in substantial glare due to the various features designed to minimize glare-related impacts, and impacts would be less than significant.

Since Alternative 4 would incorporate the same Project Design Features, Alternative 4 would not cause significant impacts due to nighttime lighting or glare.

Nighttime views and daytime glare within the Project vicinity would not be affected and impacts would be less than significant. Therefore no mitigation is required. However, Project Design Features AES-PDF-4 through 6 will ensure impacts associated with the Project or Alternative 4 would remain less than significant.

Project Design Features

AES-PDF-4 – The Project shall include security lighting. Lighting associated with the Project shall be directed downward or toward the interior of the Project Site. All exterior residential lighting shall be designed with internal and/or external glare control and shall be designed, arranged, directed, or shielded to contain direct illumination on-site, thereby preventing excessive illumination and light spillover onto adjacent land uses and/or roadways.

AES-PDF-5 – The exterior of the proposed structures shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

AES-PDF-6 – Tenant signs for the ground-floor retail and restaurant uses shall not include blinking, flashing, or oscillating lights.

These same Project Design Features shall apply to Alternative 4.

Cumulative Impacts

Neither the Proposed Project nor Alternative 4, in conjunction with the Related Projects, would not have significant cumulative impacts associated with aesthetics. With respect to the visual character of the Project Site, the Related Projects are subject to applicable development standards and environmental review. Two of these cumulative projects would be located close enough to the Project Site to potentially combine with the Project to produce substantial illumination and/or glare visible from the surrounding vicinity. One of these projects would produce some nighttime lighting but would not affect any existing residences as the Proposed Project or Alternative 4 would be located in between this cumulative project and the nearest residences.

Due to its scale in relation to existing development in the area, light generated from the interior of the Project could potentially be seen from more distant areas around the Project Site. As such, the Project and cumulative projects would contribute to ambient light levels within the surrounding area. However, as discussed above, this is a heavily urbanized area and the presence of additional nighttime illumination resulting from the Proposed and cumulative projects would not represent an alteration to the existing nighttime visual environment. Additionally, the potential increase in nighttime light resulting from the Project would not be bright enough to substantially affect nearby sensitive uses. Therefore, the contribution of the Project to this potential cumulative impact would not be substantial, and a less than significant impact would occur.

As discussed above, the Project's architectural features and facades would not be constructed of highly reflective materials. Furthermore, the Project's sources of glare that would be introduced into the Project area would not result in hazardous conditions due to the various features designed to minimize glare-related impacts. Therefore, the Project's contribution to cumulative glare would not be substantial and a less than significant impact would occur. Alternative 4's contribution to cumulative glare and nighttime lighting would be less than significant. No mitigation measures are required because no significant cumulative impacts associated with aesthetics have been identified.

Agricultural and Forestry Resources

The Proposed Project would cause no impacts on agricultural or forestry resources. Similarly, Alternative 4 would cause no such impacts. Under the CEQA Guidelines, a project may have a significant impact on agricultural or forestry resources if it were to result in (a) the conversion of state-designated agricultural land from agricultural use to another non-agricultural use; (b) conflicts with zoning for agricultural use; (c) conflicts with existing zoning or cause rezoning of forest/timber land; (d) result in the loss of forest land; or (e) other changes in the existing environment that could result in conversion of Farmland to non-agricultural use. The Project Site is currently developed with a warehouse distribution center. The Project Site does not contain any agricultural uses, and is not delineated as such on any maps prepared pursuant to the state's Farmland Mapping and Monitoring Program. The Site is zoned Heavy Industrial (M3-1-RIO). No Williamson Act Contract applies to the Project Site. Therefore, no impact would occur.

Since Alternative 4 would be constructed on the same Project Site, it would similarly result in no impacts on agricultural or forestry resources.

No mitigation measures are required, as no significant impacts associated with agricultural or forestry resources have been identified.

Air Quality

Under CEQA's Guidelines, a project may have a significant air quality impact if the project would cause any of the following: (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 in non-attainment under an applicable federal or State ambient air quality standard; (d) expose sensitive receptors to substantial pollutant concentrations; or (e) create objectionable odors affecting a substantial number of people.

The City has not adopted specific citywide significance thresholds, but instead relies on regional significance thresholds identified by the South Coast Air Quality Management District ("SCAQMD") in its CEQA Air Quality Handbook ("SCAQMD CEQA Handbook") as revised in November 1993 for construction and operational emissions impacts. The City's analysis of air quality impacts was prepared consistent with applicable SCAQMD guidance as well CalEEMod guidance, including the User's Guide.

Construction Phase Impacts – Regional Impacts

The Proposed Project's construction would lead to less than significant regional impacts during construction. Alternative 4 would also lead to less than significant impacts during construction. Construction could impact air quality through the use of heavy-duty construction equipment on- and off-site, heavy-duty trucks hauling material to and from the site, as well as vehicle trips generated by construction workers traveling to and from the Project Site. The Project's daily construction emissions would not exceed any of the SCAQMD regional pollutant thresholds during the construction process and therefore would cause a less than significant impact. Similarly, Alternative 4's daily construction emissions would not exceed SCAQMD thresholds and would only cause a less than significant impact. No mitigation measures are required because no significant regional impacts related to construction have been identified.

Construction Phase Impacts – Toxic Air Contaminants

The Proposed Project's construction would cause no impacts related to toxic air contaminants. Likewise, Alternative 4 would cause no such impacts. For Toxic Air Contaminants ("TAC"), the greatest potential for TAC emissions during construction would be diesel particulate emissions associated with heavy-duty equipment operations. Health effects from carcinogenic air toxics are usually described in terms of individual cancer risk, which is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the short-term construction schedule of approximately two years, construction of neither Alternative 4 nor the Project would represent a long-term (i.e., 70 years) source of TAC emission. No residential emission and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period during construction, construction-related TAC emission would not produce chronic exposure to TACs, and no significant impact would occur.

The Draft EIR's analysis of potential health risks from TAC emissions during the construction phase is consistent with SCAQMD's guidance on this topic and their comment letter in response to the Notice of Preparation (attached as Appendix C to the Draft EIR). Specifically, as pertinent to the Project and Alternative 4, SCAQMD recommends that health risk assessments ("HRA")

be considered for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions. But since neither the Project nor Alternative 4 are the type that would emit substantial amount of diesel PM, a HRA is not required under the applicable SCAQMD guidance.

Therefore, no mitigation measures are required because no significant impacts related to toxic air contaminants from construction have been identified.

Construction Phase Impacts – Odors

The Proposed Project's construction would cause no impacts related odors. Similarly, Alternative 4 would cause no such impacts. Potential sources that may emit odors during construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the immediate area surrounding the Project Site. Given the current density of commercial development and auto traffic from major and minor arterials adjacent to Mateo Street, any odor impacts from the construction phase will likely not adversely impacts local residents or sensitive receptors. Both Alternative 4 and the Project would utilize typical construction techniques, and odors would be typical of most construction sites and temporary in nature. Because construction of neither Alternative 4 nor the Project is expected to cause an odor nuisance, no significant impact would occur. No mitigation measures are required, as no significant impacts related to odors from construction have been identified.

Operational Phase Impacts – Regional Impacts

The Proposed Project's operation would lead to less than significant regional impacts. Alternative 4 would also less to less than significant regional impacts on air quality. Both Alternative 4 and the Project would produce long-term air quality impacts to the region primarily from motor vehicles that access the Project Site. However, regional net operational emissions of Alternative 4 or the Proposed Project would not exceed any of the applicable SCAQMD significance thresholds. Therefore, impact on regional air quality is considered less than significant. No mitigation measures are required because no significant regional impacts related to the Project's operation have been identified.

Operational Phase Impacts – Local Impacts

Neither Alternative 4's nor the Project's localized emissions would approach the SCAQMD's localized significance thresholds for human health impacts at nearby sensitive receptors during long-term operations. Impacts would be less than significant. With regards to local air quality impacts, both Alternative 4 and the Proposed Project would generate only negligible pollutant concentrations of CO, NO2, PM2.5, or PM10 at sensitive receptors and would be considered less than significant. In addition, long-term operations of the Project or Alternative 4 would not result in exceedances of CO air quality standards at roadways in the area. Thus, both the Project and Alternative 4 would have less than significant impacts. No mitigation measures are required because no significant impacts related to localized air emissions from the Project's operation have been identified.

Operational Phase Impacts –Toxic Air Contaminants

Neither operation of the Proposed Project nor Alternative 4 will include typical sources of acutely and chronically hazardous TAC emissions such as industrial manufacturing processes or automotive repair facilities and therefore the Project is not expected to result in significant TAC emissions. Per SCAQMD guidance, a health risk assessment is not required to assess

operational impacts for either the Project or Alternative 4, since neither include typical sources of TAC, and neither are the type that would emit substantial amount of diesel PM. Nor is the Proposed Project anticipated to generate a substantial number of truck trips, which can be a source of TAC emissions. Based on the limited activity of TAC sources, any minimal TAC impacts from the Project would be less than significant. For the same reasons, Alternative 4 would not cause any significant impacts due to TAC emissions. This conclusion, and the Draft EIR's methodology supporting it, are consistent with applicable SCAQMD guidance and the agency's comment letter in response to the Notice of Preparation (attached as Appendix C to the Draft EIR).

The Project includes live/work units that could be exposed to existing sources of TACs in the local area. Localized air pollution impacts from incompatible land uses can occur when polluting sources (e.g., heavily trafficked roadways, warehousing facilities, or industrial facilities) are located near a land use where sensitive individuals are planned (e.g., school, hospital, or homes). None of the industrial, commercial, or residential uses near the Project Site are known to be incompatible with the proposed residential uses. As a result, the Project would not locate residential or other sensitive uses near existing sources of TACs in the Project area, and no impacts would occur. For the same reasons, Alternative 4's impacts would be substantially similar and less than significant. No mitigation measures are required because no significant impacts related to toxic air contaminants from the Project's operation have been identified.

Operational Phase Impacts – Odors

Impacts related to odors from the Project's operation would be less than significant. Alternative 4 would also have less than significant impacts. Neither Alternative 4 nor the Project would include land uses and industrial operations typically associated with odor complaints, such as agricultural uses, wastewater treatment plants, good processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Any unpleasant odors from the restaurants can be ad-dressed by SCAQMD's Rule 402, which governs nuisances. Therefore, neither Alternative 4 nor the Project would have no impact with respect to odors. No mitigation measures are required because no significant impacts related to odors from the Project's operation have been identified.

Biological Resources

The Proposed Project would cause no impacts on biological resources. Similarly, Alternative 4 would cause no such impacts. Under the CEQA Guidelines, a project may have a significant impact on biological resources if it (a) has a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or the U.S. Fish and Wildlife Service; (b) has a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, or regulations by the California Department of Fish and Game or the U.S. Fish and Wildlife service; (c) has a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means; (d) may 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) may conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or (f) may conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

The Project Site is located in an urbanized area of the City and is currently developed with a warehouse and minimal landscaping. The Project Site does not contain any natural open spaces, act as a wildlife corridor, or possess any areas of significant biological value. No

hydrological features are present on the Site and there are no sensitive habitats present. Due to the lack of biotic resources, no candidate, sensitive, or special status species identified in local plans, policies, or regulations by the California Department of Fish and Wildlife, the California Native Plant Society, or the U.S. Fish and Wildlife Service would be expected to occur on the Project Site. There are also no riparian areas located on or adjacent to the Project Site. The Project would not involve changes in the existing environment that could interfere with the movement of migratory birds or other wildlife species. No bodies of water exist on the Project Site to provide habitat for fish. The Project Site is also not located in or adjacent to an existing or proposed Significant Ecological Area. Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that applies to the Project Site. Based on the conditions on and surrounding the Project Site and the proposed work on the Project Site, the Project will have no impact on biological resources with respect to candidate, sensitive, or special status species, riparian habitat, wetlands, migratory fish or bird species, or adopted conservation plans.

Local ordinances protecting biological resources are limited to the City of Los Angeles Protected Tree Ordinance, as modified by Ordinance 177,404. No protected trees are located on or adjacent to the Project Site. If the Project proposes the removal of the City of Los Angeles right-of-way trees along Santa Fe Avenue, a permit would need to be obtained from the City's Urban Forestry Division. Further, any tree removal would need to comply with the ordinance. Therefore, the Project would not conflict with any tree preservation policy or ordinance, and no impacts would occur. For the same reasons, Alternative 4 would also result in no impacts to biological resources because it would be constructed on the same Project Site.

No mitigation measures are required, as no significant impacts associated with biological resources have been identified.

Cultural Resources

The Proposed Project would not cause a significant impact to historical resources, archaeological resources, paleontological resources, cultural resources or human remains. For the same reasons discussed below, Alternative 4 would result in less than significant impacts to such resources. Under the CEQA Guidelines, a project may have a significant impact on cultural resources if it (a) will cause a substantial adverse change in significance of a historical resource as defined in CEQA Guidelines section 15064.5; (b) will cause a substantial adverse change in significance of an archaeological resource pursuant to CEQA Guidelines section 15064.5; (c) will directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or (d) will disturb any human remains, including those interred outside of formal cemeteries.

For historical resources, the State Office of Historic Preservation recommends that properties over 45 years of age be evaluated for their potential as historic resources. The building on the Project Site is approximately 29 years old. Thus, the existing building is neither listed nor expected to be listed in an historical register. No nearby historical resources would be impacted by the Project.

For archaeological resources, the search of the California Historical Resources Information System (CHRIS) resulted in the identification of 10 previously recorded historic archaeological resources —all of which are located outside the Project Site. While four of the study areas intersected the Project Site, none included an archaeological assessment of the Project Site. Archival research identified other nearby historical water conveyance features including Zanja No. 1, historically located approximately 70 feet west of the Project Site along the west side of Mateo Street. Review of historical maps and descriptions of Zanja No. 1 suggest it is very unlikely any material remains are preserved within the Project Site. It is therefore concluded that the Project Site has a low sensitivity for containing archaeological resources attributable to

Zanja No. 1. Additionally, a Sacred Lands File Search was performed by the NAHC for the Project Site on December 20, 2016. The results of this search were negative.

Under California Public Resources Code Section 21083.2, development projects that involve excavations are required to implement the following measures: If any archaeological materials are encountered during the course of Project development, all further development activity in the vicinity of the materials shall halt and: (a) The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. (b) The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource. (c) The Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report. (d) Project development activities may resume once copies of the archaeological survey, study or report are submitted to: SCCIC Department of Anthropology, McCarthy Hall 477, CSU Fullerton, 800 North State College Boulevard, Fullerton, CA 92834. (e) Prior to the issuance of any building permit, the Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered. (f) A covenant and agreement binding the Applicant to this condition shall be recorded prior to the issuance of a grading permit. Implementation of these requirements pursuant to Public Resources Code Section 21083.2 would ensure that Project impacts to unknown archaeological resources would be less than significant. Based upon the recommendation of the NAHC, the following Conditions of Project Approval will also be applied by the City to the Project to ensure that unknown archaeological resources, if encountered, are properly identified and handled. (1) The Project Applicant shall retain a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Standards for professional archaeology, during the excavation phase to carry out the measures related to archaeological resources described below. (2) Prior to the commencement of demolition and excavation, an Archaeological Resources Monitoring Plan (Monitoring Plan) shall be prepared. The Monitoring Plan shall include, but not be limited to, a construction worker training program; monitoring protocol for excavation activities; and discovery and processing protocol for inadvertent discoveries of archaeological resources. The plan should identify areas with moderate to high sensitivity determined for archaeological resources that require monitoring and detail a protocol for determining circumstances in which additional or reduced levels of monitoring (e.g. spot checking) may be appropriate. Specifically, the Monitoring Plan should include a framework for assessing the geoarchaeological setting to determine whether sediments capable of preserving archaeological remains are present, and the depth at which these sediments would no longer be capable of containing archaeological material. (3) Prior to excavation, a qualified archaeologist shall be retained to monitor excavation activities as stipulated in the Monitoring Plan. Specifically, field observations regarding the geoarchaeological setting should be taken to determine whether undisturbed sediments capable of preserving archaeological remains, and the depth at which these sediments would no longer be capable of containing archaeological material. The duration and timing of the monitoring shall be determined by the qualified archaeologist in consultation with the Los Angeles Department of City Planning and the Project Applicant. The archaeological monitor shall work under the supervision of the qualified archaeologist. At the conclusion of monitoring activities, a technical report will be prepared by a qualified archaeologist documenting the methods and results of all work completed under the Monitoring Plan and submitted to City Planning and the SCCIC.

For paleontological resources, according to the Natural History Museum of Los Angeles County, there are no known paleontological resources within the Project Site. However, the excavation for the subterranean parking levels has the potential to affect unknown paleontological resources. Although the younger Quaternary alluvium deposits underlying the Project Site do

not contain significant fossil vertebrates at shallow levels, the underlying older Quaternary deposits found at varying depths may contain vertebrate fossils. Under California Public Resources Code Sections 5097.5, development projects that involve excavations are required to implement the following measures, which will ensure that if any such resources are found during construction of the Project, they would be handled according to the proper regulations, and impacts to potential paleontological resources that may exist beneath the Project Site would be less than significant. If any paleontological materials are encountered during the course of project development, all further development activities in the vicinity of the materials shall halt and: (a) The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. (b) The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource. (c) The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study, or report. (d) Project development activities may resume once copies of the paleontological survey, study, or report are submitted to the Los Angeles County Natural History Museum. (e) Prior to the issuance of any building permit, the Applicant shall submit a letter to the case file indicating what, if any, paleontological reports have been submitted, or a statement indicating that no material was discovered. (f) A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

For human remains, the Project Site is located in a heavily urbanized area, and is currently developed with a warehouse building. The likelihood of encountering human remains on the Project Site is minimal. According to the Native American Heritage Commission, the Sacred Lands File search did not indicate the presence of any resources within the Project Site. However, during the construction and excavation of the Project Site, there is a possibility that human remains could be encountered. Under California Health and Safety Code Section 7050.5 and Native American Heritage Commission (NAHC) regulations (Public Resource Code Section 5097), development projects that involve excavations are required to implement the following measures: In the event that human remains are discovered during excavation activities, the following procedure shall be observed: (a) Stop excavation immediately in the vicinity of the remains and contact the County Coroner at: 1104 N. Mission Road, Los Angeles, CA 90033, 323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or 323-343-0714 (After Hours, Saturday, Sunday, and Holidays). (b) The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission. (c) The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American. (d) The most likely descendent has 48 hours after being allowed access to the site to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. (e) If the most likely descendent does not make recommendations within 48 hours after being allowed access to the site, the Applicant shall reinter the remains in an area of the property secure from further disturbance. (f) If the Applicant does not accept the most likely descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission. Implementation of these requirements pursuant to California Health and Safety Code Section 7050.5 and Native American Heritage Commission (NAHC) regulations (Public Resource Code Section 5097) would ensure that Project impacts to unknown human remains or tribal cultural resources would be less than significant. Based upon the recommendation of the NAHC, the Conditions of Project Approval shown above would also be implemented to ensure that unknown human remains or tribal cultural resources, if encountered, are properly identified and handled.

The City complied with the requirements of AB 52 and SB 18 by issuing notification letters concerning the Proposed Project to all California Native American Tribes that are traditionally and culturally affiliated with the Los Angeles area. These letters were sent on November 15, 2016. The City did not receive any requests from Tribal organizations to initiate formal consultation regarding the Proposed Project.

Since Alternative 4 would involve similar excavation work at the same Project Site, as well as incorporate the same measures described above, Alternative 4 would not cause any significant impacts to cultural resources.

No mitigation measures required, as the Project will not lead to significant impacts related to cultural resources. The regulatory requirements set forth above will ensure that impacts are less than significant.

Geology and Soils

Under CEQA's Guidelines, a project may have a significant impact to geology and soils if the project would result in one or more of the following: (a) exacerbate existing environmental conditions so as to increase the potential to expose people or structures to potential substantial adverse effects, including risk of loss, injury, or death involving – (i) rupture of a known earthquake fault, (ii) strong seismic ground-shaking, (iii) seismic-related ground failure, including liquefaction, or (iv) landslides; (b) result in substantial soil erosion or the loss of topsoil; (c) be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially resulting in on- or off-site landslide, lateral spreading, subsistence, liquefaction, or collapse caused in whole or in part by the project's exacerbation of the existing environmental conditions; (d) be located on expansive soil, creating substantial risks to life or property caused in whole or in part by the project exacerbating the expansive soil conditions; or (e) have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

The L.A. CEQA Thresholds Guide requires the geotechnical analysis to address the following areas of study (1) geologic hazards; (2) sedimentation and erosion; (3) landform alternation; and (4) mineral resources. The City concluded in the initial study that the Project would not result in impacts related to mineral resources, as discussed further above in Section 4.1.4.

Fault Rupture

Neither the Proposed Project nor the Alternative 4 would lead to significant impacts related to fault rupture. Fault rupture is defined as the surface displacement that occurs along the surface of a fault during an earthquake. The City of Los Angeles Seismic Safety Element does not include the Project Site within an Alquist-Priolo Special Study Zone or Fault Rupture Study Area. The nearest fault, the Puente Hills Blind Thrust Fault, is approximately 1.7 miles away.

Both Alternative 4 and the Project would comply with the CGS Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California (1997), which provides guidance for the evaluation and mitigation of earthquake-related hazards, and with the seismic safety requirements in the UBC and the LAMC. Further, the City of Los Angeles Building Code contains construction requirements to ensure that structures are built to a level such that they can withstand acceptable seismic risk. Therefore, by virtue of compliance with regulations requiring implementation of the recommendations in the geotechnical investigation for the Project, neither Alternative 4 nor the Project would expose people or structures to substantial adverse effects associated with fault rupture, and no significant impact would occur. Because Alternative 4 would be built on the same Site, and would equally comply with existing regulations, its impacts would also be less than significant.

No mitigation measures are required because no significant impacts related to fault rupture have been identified.

Strong Seismic Ground Shaking

Compliance with existing regulations will ensure that the Proposed Project would have no impacts related to strong seismic ground shaking. No significant impacts would occur. Similarly, Alternative 4 would cause no such impacts. A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region.

Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the southern California region and would minimize the potential to expose people or structures to substantial risk, loss, or injury. Therefore, no impacts related to seismic ground shaking would occur. Since Alternative 4 would also comply with such codes and practices, Alternative 4 would not cause any such significant impacts.

No mitigation measures are required because no significant impacts related to strong seismic shaking have been identified.

Liquefaction

The Proposed Project's impacts with respect to liquefaction would be less than significant. Alternative 4 would also have less than significant impacts with respect to liquefaction. Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when certain types of soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Low groundwater table and the presence of loose medium dense sand and silty sand are factors that could contribute to the potential for liquefaction. The Project Site is not identified by ZIMAS and the State Seismic Hazard Zone Map as being within a liquefaction zone. In addition, the City of Los Angeles Seismic Safety Element does not identify the Project Site as being located within a potentially liquefiable area. As explained in Appendix H, Report of Geotechnical Investigation, attached to the Draft EIR, a review of data from nearby water monitoring wells indicates that groundwater occurs at a depth of approximately 100 feet in the vicinity of the Project Site. In addition, no groundwater was encountered in the test borings performed up to 50 feet below existing grade for this investigation. The lowest excavation proposed for the Project and Alternative 4 would be well above the lowest estimated groundwater. Thus, the potential for liquefaction to occur at the site is considered to be low and Project impacts related to liquefaction would be less than significant. Because Alternative 4 would be constructed on the same Site, its impacts would also be less than significant.

No mitigation measures are required because no significant impacts with respect to liquefaction have been identified.

Landslide

The Proposed Project would not lead to significant impacts related to landslides. Similarly, Alternative 4 would not cause any such impact. A significant adverse effect may occur if a project is located in a hillside area with soil conditions that would suggest high potential for sliding. Landslides can occur on slopes under normal gravitational forces and during

earthquakes when strong ground motion can cause failure. Landslides tend to occur in loosely consolidated, wet soil, and/or rock on unstable sloping terrain. The Project Site is relatively flat and not near any hillside areas. The Project Site is not classified as a landslide hazard zone in the State Seismic Hazard Zones Map. The Project Site is also not identified by ZIMAS as being within a landslide hazard zone. Finally, the City of Los Angeles Seismic Safety Element shows that the Site is not within a landslide area. Therefore, no impact with respect to landslides would occur. For the same reasons, Alternative 4 would also cause no significant impacts due to landslide.

No mitigation measures are required because no significant impacts related to landslides have been identified.

Substantial Soil Erosion or Loss of Topsoil

The Proposed Project's impacts to substantial erosion or the loss of topsoil would be less than significant. Alternative 4 would also have less than significant impacts. A project may have a significant impact if it exposes large areas to the erosional effects of wind or water for a protracted period of time. The Project Site is located in an urbanized portion of Los Angeles and is completely paved and developed with an industrial warehousing facility. Any topsoil that may exist on the site was previously blended with other on-site soils during previous site preparation/grading activities. As such, neither development of Alternative 4 nor the Project would result in substantial loss of topsoil.

Construction activities such as grading and excavation could create the potential for soil erosion. Yet the potential for soil erosion on the Project Site is low due to the general level topography of the Project Site and the presence of existing off-site drainage facilities. Construction would require the removal of existing pavement and grading earth and excavation. Conformance with the City Building Code Sections 91.7000 through 91.7016, which include construction requirements for grading, excavation, and use of fill, would reduce the potential for wind or waterborne erosion. Additionally, the City's Building Code requires an erosion control plan to be reviewed by the Department of Building and Safety prior to construction if grading exceeds 200 cubic yards and occurs during the rainy season. As the Project would comply with all mandatory Code requirements, project impacts related to soil erosion during construction would be minimal. The potential for soil erosion during operation would be relatively low due to the urban nature of the Project area and the general level of topography of the Project Site. The Project would develop the entire Project Site with new buildings, paving, and surface treatment. As such, no significant impacts would occur. Since Alternative 4 would comply with the same regulations and be built on the same site, Alternative 4 would not cause any significant impact.

No mitigation measures are required because no significant impacts related to substantial soil erosion or loss of topsoil have been identified.

Soil Stability

The Proposed Project's impacts on soil stability will be less than significant. Alternative 4's impacts would also be less than significant. A project may have a significant impact related to soil stability if the Project is built in an unstable area without proper site preparation or design features to provide adequate foundations for the project buildings, thus posing a hazard to life and property. Construction activities must comply with the City's Building Code, which is designed to ensure safe construction, including building foundation requirements appropriate to site conditions. The Project Site is not at risk for landslides, as the Project Site is relatively level with very little elevation change. The potential for slope stability hazards is considered low.

Some seismically-induced settlement of the proposed structures should be expected as a result of strong ground-shaking. However, due to the uniform nature of the underlying geologic materials, excessive differential settlements are not expected to occur. Preliminary geotechnical studies and exploratory borings on the Project Site indicate that the site's geology is stable and can support the Project's proposed structure using spread foundation systems that are founded in the dense, naturally deposited soils expected to occur at the lowest level of construction. As noted above, the Project would be required to conform to the Uniform Building Code seismic standards as approved by the Department of Building and Safety. Overall, Project impacts with respect to soil stability would be less than significant. Alternative 4's impacts would be substantially similar and less than significant since it would comply with the same regulations and be built on the same site.

No mitigation measures are required because no significant impacts related to soil stability have been identified.

Septic Tanks

The Proposed Project would not lead to significant impacts related to septic tanks. Alternative 4 would also lead to no such impacts. A project may have a significant impact related to septic tanks if the project is located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City, which is served by a wastewater collection, conveyance, and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no significant impacts would occur. The same is true for Alternative 4.

No mitigation measures are required because no significant impacts related to septic tanks have been identified.

Cumulative Impacts

The Proposed Project's impacts in conjunction with the Related Projects related to geology and soils would be less than significant. For similar reasons, the same finding is made as to Alternative 4. Geotechnical impacts related to the Related Projects in the development area would involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. The impacts on each site would be specific to that site and its users and would not be common or contribute to (or shared with, in an additive sense) the impacts on other sites. Thus, neither Alternative 4 nor the Project, together with the Related Projects would create an impact that is cumulatively considerable.

None of the cumulative projects has elements or activities that would cause or accelerate geologic hazards off-site that would contribute to increased geological hazards on the Project Site. In addition, the design and construction of the Project, Alternative 4 and the cumulative projects shall conform to the Uniform Building Code seismic standards as approved by the Department of Building and Safety. In addition, development on each site would be subject to uniform site development and construction standards that are designed to protect public safety, which includes a geotechnical report. Therefore, incremental impacts related to geology and soils would not be cumulatively considerable. Alternative 4's impacts would be substantially similar and therefore would not be cumulatively considerable.

No mitigation measures are required because no significant cumulative impacts related to geology and soil have been identified.

Greenhouse Gas Emissions

Under CEQA's Guidelines, as amended in 2010, a project could have a significant impact related to greenhouse gases ("GHGs") if it would: (1) generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or (2) conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

CEQA Guidelines section 15064.4 also assists lead agencies in determining the significance of the impacts of GHGs. That section states that lead agencies shall have discretion to determine, in the context of a particular project, whether: (1) to use a model or methodology to quantify a project's greenhouse gas emissions; and/or (2) to rely on a qualitative analysis or performance based standards. Section 15064.4 further states that a lead agency should consider specific factors, among others, when assessing the significance of GHG emission on the environment, including: (a) the extent to which the project may increase or reduce GHG emissions as comparted to the existing environmental setting; (b) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and (c) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHGs. CEQA Guidelines section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds.

Under CEQA, the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impacts. Although GHG emissions can be quantified, neither CARB, nor SCAQMD, nor the City of Los Angeles has adopted a quantitative significance threshold for GHG emissions that would be applicable to the Project. Per CEQA Guidelines section 15064(h)(3), a project's incremental contribution to a cumulative impact can be considered not to be cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative impact within the geographic area of the project. Therefore, CEQA Guidelines section 15064(h)(3) allows a lead agency to make a finding of less than significant for GHG emissions if a project complies with program and/or other regulatory schemes designed to reduce GHG emissions.

In the absence of any adopted, numeric threshold, the City evaluated the significance of the Project's potential GHG emissions consistent with CEQA Guidelines section 15064.4(b)(2) by considering whether the Project complies with applicable regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction of mitigation of greenhouse gas emissions.

The City recognizes that the state's AB 32 Scoping Plan, which calls for a return to 1990 levels of GHG emissions by 2020, represents the most significant statewide plan for reducing GHG emissions. Demonstrating consistency with AB 32 Statewide targets is considered to be conservative, as other plans are less aggressive.

The California Environmental Protection Agency updated the AB 32 Scoping Plan in May 2014 in a document called the "First Update to the Climate Change Scoping Plan" ("2014 Scoping Plan Update"). The 2014 Scoping Plan Update forecasts that the state's CO2e emission inventory in 2020 will be approximately 509 million metric tons. This estimate incorporates growth forecasts for population, housing, and jobs, along with growth in emissions from the range of industries that produce greenhouse gas emissions. However, the estimate does not assume implementation of AB 32 and SB 375-related programs.

Goals and targets within the 2014 Scoping Plan Update call for a 15.3 percent reduction in 2020 forecasts emissions from 509 to 431 million metric tons of CO2e emissions. These reductions are necessary to achieve the state's objective of ensuring that 2020 emissions meet the 1990

statewide levels. These reductions are to come from a variety of sectors, including energy, transportation, high-global warming potential sources, waste, and the state's cap-and-trade emissions program. In the energy sector, the recommended actions include reducing the state's electric and energy utility emissions, reducing emissions from large industrial facilities, controlling fugitive emissions from oil and gas producing, and reducing leaks from industrial facilities. In the transportation sector, the recommended actions include implementing phase 2 heavy-duty truck GHG standards, the zero-vehicle emission action plan for trucks, constructing the High Speed rail system from San Francisco to Los Angeles, coordinating land use planning, and implementing a sustainable freight strategy. With respect to high global warming potential sources, the recommended actions include reducing the high global warming potential compounds from refrigeration, air conditioning, and aerosols. In the waste sector, the recommended actions include eliminating disposal of organic materials at landfills, developing in-state infrastructure, addressing challenges with composting and anaerobic digestion, and implementing additional methane control at landfills. With respect to the cap-and-trade emissions program, the recommended actions include reducing emissions from regulated entities through performance-based targets.

Under the 2014 Scoping Plan Update, nearly all of the reductions are to come from sources that are controlled at the statewide level by state agencies, including the Air Resources Board, Public Utilities Commission, High Speed Rail Authority, and California Energy Commission. The few actions that are directly or indirectly associated with local government control are in the transportation sector, which is charged with reducing 4.5% of baseline 2020 emissions. Of those recommended actions to reduce emissions in the transportation sector, the 2014 Scoping Plan Update specifically identifies local and governments as the responsible agency for one action — reducing GHG emissions through coordinated planning.

On April 6, 2016, the Southern California Association of Governments ("SCAG") adopted its 2016-2040 RTP/SCS update, calling for a continuation of integrated planning for land use and transportation that will help achieve the state's goal of reducing per capita GHG emissions by eight percent by 2020 compared to 2005 levels, by 18 percent by 2035, and 21 percent by 2040. The Plan calls for public transportation improvements that will reduce GHG emissions per household by up to 30 percent, one percent reduction in GHG from having zero emission vehicles, neighborhood vehicles, and carsharing/ridesourcing make up two percent of the vehicle fleet by 2040.

Project Construction and Operation

The Proposed Project's construction and operation would not cause significant impacts with respect to GHG emissions. Alternative 4 would also have less than significant impacts. The Project's construction would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. Since there are no defined thresholds of significance for temporary emission of GHGs, construction emissions are considered as part of the long-term GHG impacts of the Proposed Project.

As one approach to gauging the significance of the Proposed Project's emissions, the Project's GHG emissions were compared to the Project in the absence of any GHG reduction measures (i.e., the No Action Taken ("NAT") Scenario. This approach mirrors the concepts used in the CARB's Climate Change Scoping Plan for the implementation of AB 32. This methodology is used to analyze consistency with applicable GHG reduction plans and policies and demonstrate the efficacy of the measures contained therein, but it is not a threshold of significance.

The NAT scenario is used to establish a comparison with project-generated GHG emissions. The NAT scenario does not consider site-specific conditions, project design features, or

prescribed mitigation measures. The net emissions for the Project and its associated CARB 2020 NAT scenario are estimated to be 11,369 and 17,398 MTCO2e per year, respectively, which shows the Project will reduce emissions by 33 percent from the CARB 2020 NAT scenario, through Project Design Features, the Project's design, sustainability, site, and land use characteristics, combined with compliance with regulatory requirements.

The proposed emissions would represent a net 5,496 metric ton reduction in annual emissions from the NAT scenario when accounting for existing emissions from current development. Based on these results, the Project is consistent with the reduction target as a numeric threshold (15.3 percent) set forth in the 2014 Revised AB 32 Scoping Plan. This analysis discloses potential emissions under both scenario and uses the 2014 Revised AB 32 Scoping Plan's statewide goals as one approach to evaluate the Project's impact.

Note that much of the vehicle-generated CO2 emissions attributed to the Project are attributable to vehicles at an existing location moving to the Project Site, and not from new vehicle emissions sources relative to global climate change. Therefore, although it is not possible to calculate the net contribution of vehicle-generated CO2, CH4, and N2O emissions from the Proposed Project (i.e., Project generated emissions minus current emissions from vehicles that would move to the Project Site), the net contribution would likely be much less than the estimated emissions.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project. Executive Orders S-3-05 and B-30-15, the AB 32 scoping Plan, SCAG's Sustainable Communities Strategy, and the City of Los Angeles's plans and policies all apply to the Project and are intended to reduce GHG emissions, and support statewide targets set in AB 32.

The Project would be consistent with the state's Executive Orders S-3-05 and B-30-15, which are orders from the Executive Branch for the purpose of reducing GHG emissions. These strategies call for developing more efficient land-use patterns to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. The Project includes elements of smart land use as it is located in an urban infill area that is well served by transportation infrastructure, including public transit provided by Metro. The Project's post-2020 emissions trajectory are expected to follow a declining trend, consistent with the 2030 and 2050 targets and Executive Order S-3-05 and B-30-15.

The Project would also be consistent with all feasible and applicable actions and strategies recommended in the AB 32 Scoping Plan (summarized in Table 4.E-5 of the Draft EIR). For example, the Project will also comply with the applicable provisions of the California Green Building Standards, which offer enhanced windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses. The Project will also be consistent with the applicable strategies for energy emissions sources, including utilizing a utility provider with goals to comply with the state's renewable portfolio standard program for a certain percentage of energy received and generated to be from eligible renewable energy sources. Both construction and operational activities from the Project site would generate transportation-related emissions from combustion of fossil fuels that are covered in the state's Cap and Trade program.

The Project would also be consistent with the applicable goals and principles set forth in the 2012–2035 RTP/SCS and the Compass Growth Vision Report. Therefore, the Project would be consistent with the GHG reduction related actions and strategies contained in the 2012–2035 RTP/SCS (summarized in Table.E-6 of the Draft EIR). Further, the inclusion of electric vehicle

charging infrastructure (see Project Design Feature GHG-PDF-1) will support the penetration of electric zero-emission vehicles into the vehicle fleet.

The Proposed Project is an infill development that is also consistent with all applicable actions and strategies in the 2016 RTP/SCS and its focus on integrated land use planning (summarized in Table.E-7). As a land use development project, 2016-2040 RTP/SCS is a directly applicable adopted regulatory plan to reduce GHG emissions. Specifically, the site's location near substantial local transit bus services, and within one-quarter mile of a Metro Red Line station places it in a High Quality Transit Area (HQTA). The 2016 RTP/SCS projects that these areas, while comprising only three percent of land area in the region make up 46 percent of future household growth and 55 percent of future job growth. Further, the vertical integration of land uses on the site will produce substantial reductions in auto mode share to and from the site that will help the region accommodate growth and promote public transit ridership that minimizes GHG emission increases and reduces per capita emissions consistent with the RTP/SCS. As an urban infill development that would promote per capita reductions in vehicle travel, the Project is also consistent with SCAG's 2016-2040 RTP goal of reducing per capita VMT by 7.4 percent over time. The Project would also be consistent with the applicable goals and principles set forth in the 2016-2040 RTP/SCS and the Compass Growth Vision Report. Therefore, the Project would be consistent with the GHG reduction related actions and strategies contained in the 2016-2040 RTP/SCS.

With respect to the City of Los Angeles plans and policies, construction of the Proposed Project is consistent with the "ClimateLA" plan's goal of reducing or recycling 70 percent of trash (including construction waste) by 2015. The Project is also consistent with the Plan's focus on reducing emissions from private vehicle use. The mixed-use nature of the Project is consistent with the Plan's land use policies that promote high density near transportation, transit-oriented development, and making underutilized land available for housing and mixed-use development, especially when near transit. The Project would also comply with the City of Los Angeles' Green Building Ordinance standards that would reduce emissions beyond a NAT scenario, and are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the State's codes.

Therefore, the Project's impacts on GHG emissions would be less than significant.

Alternative 4 would produce about 3,087 fewer metric tons of CO2e per year compared to the Project. Alternative 4 would also be consistent with all the plans, regulations and orders described above. Therefore, Alternative 4 would not cause a significant impact due to GHG emissions.

No mitigation measures are required, as the Project or Alternative 4 will have a less than significant impact related to GHG emissions. With implementation of Project Design Features, the Project's design, sustainability, site, and land use characteristics, combined with compliance with regulatory requirements, impacts related to GHG emissions would be less than significant. Those designs, features, and reductions are ensured through the conditions of approval for the Project's entitlements and through Section 4, Mitigation Monitoring Program, of the Final EIR. In addition, regulatory processes are in place to ensure compliance with other regulatory requirements. The following Project Design Feature will also be implemented to ensure that the Project's and Alternative 4's impacts to GHG emissions are less than significant.

Project Design Feature

GHG-PDF-1 – The Project would encourage carpooling and the use of electric vehicles by providing that at least 20 percent of the total code-required parking spaces provided for all types of parking facilities, but in no case less than one location, shall be capable of supporting future

electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20 percent results in a fractional space, round up to the next whole number. A label stating "EV CAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

At least five percent of the total code-required parking spaces shall be equipped with EV charging stations. Plans shall indicate the proposed type and location(s) of charging stations. Plan design shall be based on Level 2 or greater EVSE at its maximum operating capacity. When the application of the five percent requirement results in a fractional space, round up to the next whole number.

Alternative 4 would incorporate the same Project Design Features.

Cumulative Impacts

The Proposed Project, in conjunction with the Related Projects, would not result in significant cumulative GHG emissions impacts. Alternative 4 would also not result in significant cumulative impacts with respect to GHG emissions.

Given the global nature of GHG emissions, the analysis of GHG emissions is by its nature a cumulative impacts analysis. The City's analysis of the Project's GHG impacts accounted for the Project's potential to contribute to the cumulative impact of global climate change. The Project would be consistent with a number of relevant plans and policies that govern climate change. For example, the Project is consistent with the State's Executive Order S-3-05, which calls for reducing GHG emissions statewide to 1990 levels, including 15 percent reductions by 2020. The Project is also consistent with SCAG's RTP/SCS, which calls for regional growth and transportation emissions to be consistent with regional and state air pollution objectives. The 2016-2040 RTP/SCS is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. The Project would also comply with the City's Green Building Ordinance standards that reduce emissions beyond a "business-as-usual" scenario. Finally, as discussed further above, the Project would be consistent with and will help achieve all feasible and applicable strategies as recommended in the AB 32 Scoping Plan, which provides the basis for policies that will reduce cumulative GHG emission within California to 1990 levels by 2020. As a result, the Project's cumulative impact on climate change is considered less than significant. Since Alternative 4 is also consistent with the above plans, codes and orders, its cumulative impact on climate change is less than significant.

No mitigation measures are required, as no significant cumulative impacts associated with GHG emissions impacts have been identified.

Hazards and Hazardous Materials

Under CEQA's Guidelines, a project could have a potentially significant impact on hazards and hazardous materials if it would result in one or more of the following: (a) create a significant hazards 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 emission 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 include on a list of hazardous materials sites; (e) the project would result in a safety hazard for people residing or working in the project area for a project located within an airport land use plan, or where such plan has not been adopted, within two miles of a public airport; (f) for a project located within the vicinity of a private airstrip, if the project would result in a safety hazard for people residing or working the project area; (g) impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and (h) expose people or structures to a significant risk of loss, injury or death involving wildland fires.

The L.A. CEQA Thresholds Guide requires the hazardous analysis to address (1) risk of upset/emergency preparedness and (2) human health hazard.

Transport, Use, or Disposal of Hazardous Materials

The Proposed Project will not result in significant impacts related to the transport, use, or disposal of hazardous materials. Alternative 4 would also not result in any significant impacts. The Project's construction would involve the temporary transport, use, or disposal of potentially hazardous materials, including paints, adhesives, surface coatings, cleaning agents, fuels, and oils. All of those materials would only be used in a short-term nature during construction activities. All potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which would ensure that impacts would be less than significant. Any emission from the use of such materials would be minimal and localized to the Project Site. Since the Project's construction would comply with applicable regulations and would not expose persons to substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards, no impacts associated with the potential release of hazardous substances during the Project's construction would occur.

The Project's operation would include the development of live work, office, retail, restaurant, and cultural uses that would involve the limited use of hazardous materials. Operation of the residential uses would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, paints, and pesticides for landscaping. Hazardous materials to be used, stored, and disposed of by the Project's commercial uses would vary depending on the commercial use but could include cleaning solvents, waxes, dyes, toners, paints, bleach, grease, and petroleum products. With implementation of hazardous waste reduction efforts on-site (i.e., the City's Green Building Ordinance and through source reduction, recycling, on-site treatment, etc.) as well as the proper treatment and disposal of such wastes at licensed resource recovery facilities, the Project would not generate significant amounts of hazardous wastes.

The transport of any hazardous materials and wastes during the Project's operation would occur in accordance with federal and state regulations, including the Resource Conservation and Recovery Act ("RCRA"), Title 49 of the Code of Federal Regulations, the California Vehicle Code, and the California Health and Safety Code. In accordance with those regulations, the transport of hazardous materials and wastes would only occur with transporters who have received training and appropriate licensing, and hazardous waste transporters would be required to complete and carry hazardous waste manifests. As a result, there would be no significant impact to the transport of hazardous materials.

During the Project's operation, hazardous waste releases through use or disposal may result in potential injury if exposure takes place, and, if not mitigated, result in soil and/or groundwater impacts. Compliance with applicable City, state, and federal regulations related to the handling, storage and disposal of hazardous waste would ensure that such impacts would be less than

significant. Additionally, implementation of the Project could incrementally decrease the transport of hazardous materials and waste to/from the Project Site when compared to existing conditions, since the existing auto-related service uses would not be included as part of the Project.

Overall, with compliance with federal, state, and local regulations, the transport of hazardous materials and wastes during Project construction and operation would not create a hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials consistent with existing regulatory framework. The same is true for Alternative 4.

No mitigation measures are required, as no significant impacts associated with the transport, use or handling of hazardous materials have been identified.

Upset Conditions Involving the Release of Hazardous Materials

The Project's impacts from upsetting conditions involving the release of hazardous materials would be less than significant. Alternative 4 would also not result in significant impacts. The structures on the Project Site were constructed in 1988. Therefore, no Asbestos-Containing Materials are presumed to exist on-site and the Project would have no impact with respect to ACMs. The structures on the Project Site were constructed in 1988. Therefore, no Lead-Based Paint is presumed to exist on-site and the Project would have no impact with respect to LBP. There is one transformer located on-site, which appears to be in good condition with no visible signs of hazardous material spills or leaks. As no staining or indications of releases were noted relative to the transformer, impacts related to Polychlorinated Biphenyls would be less than significant. No storage tanks or containers are known to exist on the Project Site. Therefore, impacts related to on-site storage of hazardous materials would be less than significant. The same is true for Alternative 4.

No mitigation measures are required, since no significant impacts associated have been identified.

Emergency Response Plan or Emergency Evacuation Plan

The Proposed Project's construction and operation would not lead to significant impacts related to an emergency response plan or evacuation plan. Similarly, Alternative 4 would not lead to significant impacts. The removal of the existing on-site buildings and the construction of the Project would occur within the property boundaries of the Project Site. Temporary pedestrian or vehicular public right-of-way closures may be necessary during the construction phase for construction staging, equipment access, and pedestrian safety. In particular, partial lane closures would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if partial closures to streets surrounding the Project Site become necessary, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete. As such, the construction of the Project would not substantially impede public access, travel upon a public right-of-way, or interfere with an adopted emergency response or evacuation plan, and impacts would be less than significant.

The Project would include live/work, office, retail, restaurant, and cultural land uses and would be required to establish, implement, and maintain on file an emergency response plan, which would be inspected annually by the LAFD. As part of this emergency response plan, evacuation signs would be located in every elevator lobby above and below ground, in other conspicuous floor locations, and in each office area and restaurant, as required by Code. All emergency plans, procedures, and evacuation signs would be submitted to the LAFD for inspection and approval prior to their implementation and would be properly maintained.

The Project's operation would include retail, restaurant, office, and residential land uses and would be required to establish, implement, and maintain on file an emergency response plan. The Los Angeles Fire Department would inspect the emergency response plan annually, which would require that evacuation signs be located in every elevator lobby above and below ground, in other conspicuous floor locations, and in each office and restaurant area as required by Code. Existing regulations require that all emergency plans, procedures, and evacuation signs would be submitted to the Los Angeles Fire Department for inspection and approval prior to their implementation and would be properly maintained. In sum, the Project's construction would not substantially impede public access, travel upon a public right-of-way, or interfere with an adopted emergency response or evacuation plan, and impacts would be less than significant.

Since Alternative 4 would comply with the same codes and regulations and be built and operated similar to the Project as described in this finding, Alternative 4 would not cause any significant impacts in this area.

No mitigation measures are required because no significant impacts associated with emergency response plans or emergency evacuation plans have been identified.

Release of Hazardous Materials Within One-Quarter Mile of Schools

The Project's operation would at most involve minimal amounts of hazardous materials, and structures and roadways currently act as a buffer between the Project Site and the two schools located within 0.25 miles of the Project Site. Impacts would be less than significant. Alternative 4, which would be constructed on the same Site, would also have less than significant impacts.

The Project Site is located within 0.25 miles of two schools: Korpus School of Art and Gallery, 1300 Factory Place (700 feet southwest); Southern California Institute of Architecture, 960 E. 3rd Street (900 feet north).While the Project would be operational during school hours, the Project would use, at most, minimal amounts of hazardous materials for routine cleaning and maintenance. There are also intervening structures and roadways between the schools and the Project Site. Therefore, the Project would not pose a significant risk involving the routine transport, use, and disposal of hazardous materials or the accidental release of hazardous materials, and impacts associated with the emission of hazardous materials near an existing or proposed school would be less than significant. For the same reasons, Alternative 4 would also have less than significant impact.

No mitigation measures are required, as no significant impacts associated with the release of hazardous materials within 0.25 miles of existing or proposed schools have been identified.

Listed Hazardous Materials Sites

The risk of environmental contamination affecting the Project Site from surrounding land uses is minimal and thus no significant impacts would occur. For the same reasons, Alternative 4 would also not cause any such impacts. As part of the Phase I ESA, a review was performed of reported environmental conditions within ASTM-recommended search distances of the Site. The report identified a number of facilities within the specified search radii from the Site which are listed on governmental databases. A review of these facilities determined that none of the identified facilities presents an environmental concern to the Project Site due to its distance from the Project Site, down-gradient or cross-gradient position with respect to the site, and/or the nature of the environmental conditions at the facilities. Based upon the information obtained through interview and observations as part of the Phase I ESA, the risk of the site being affected by an environmental impact from surrounding land uses is minimal, and as such, no significant impact would occur. Implementation of Mitigation Measure HAZ-MM-1 below would ensure that

any soil contaminants present on-site would be handled in accordance with applicable regulations.

No mitigation measures are required as no significant impacts associated with listed hazardous materials sites have been identified.

Airport Land Use Plan, Or Two Miles Of A Public Airport Or Vicinity Of Private Airstrip

The Proposed Project is not within two miles of a public airport or within the vicinity of a private airstrip. Therefore, neither Alternative 4 nor the Project would have significant impacts related to an airport land use plan or nearby public airports or private airstrips. A project may have a significant impact if a project is located within two miles of a public airport, and subject to a safety hazard or within the vicinity of a private airstrip. The Project Site is also not located within two miles of public airport and is not in the vicinity of a private airstrip. Therefore, no significant impacts would occur under the Project or Alternative 4.

No mitigation measures are required, as no significant impacts associated with a public or public use airport have been identified.

Wildland Fires

The Project Site is not located in proximity to wildland areas and does not pose a potential fire hazard. Therefore, neither the Proposed Project nor Alternative 4 would cause any significant impacts related to wildland fires.

A project may have a significant impact related to wildland fires if the project is located in proximity to wildland areas and poses a potential fire hazard, which would affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone as identified through the City's ZIMAS Parcel Profile Report. The project Site is also not located within a designated Fire Buffer Zone or Mountain Fire District as identified in the Safety Element of the City's 1996 General Plan. Therefore, no significant impact would occur under the Project or Alternative 4.

No mitigation measures are required, as no significant impacts associated with wildland fires have been identified.

Cumulative Impacts

Neither Alternative 4 nor the Proposed Project, in conjunction with the Related Projects, would result in a significant cumulative impact related to hazards and hazardous materials. The City considered the cumulative growth in the Project area, including the known development projects on the Related Projects list as well as the general ambient growth projected to occur. Some of this growth is anticipated to occur on or around properties in the Project area known to contain hazardous or potentially hazardous conditions, such as hazardous waste generation or handling, or the presence of leaking underground storage tanks. While impacts associated with hazards and hazardous materials are typically site-specific and do not cumulatively affect off-site areas, conditions such as contaminated groundwater can affect down-gradient properties. In addition, operation of many of the cumulative projects can reasonably be expected to involve the limited use of potentially hazardous materials typical of those used in residential and commercial developments, including cleaning agents, paints, pesticides, and other materials used for landscaping. Further, some of the cumulative projects propose manufacturing, industrial, and warehouse uses that may also utilize, handle, store, or generate hazardous materials. However, regardless of the number and location of the Related Projects, neither

Alternative 4 nor the Project, together with the Related Project would create an impact that is cumulatively considerable. Each development project would have to comply with site specific development standards and state hazardous materials handling and transporting regulations. Compliance with these standards would ensure that the related projects would further the objectives of applicable community and regional plans. Therefore, neither Alternative 4 nor the Project's cumulative impacts related to hazards and hazardous materials would be significant.

No mitigation measures are required, as no significant cumulative impacts associated with hazards and hazardous materials have been identified.

Hydrology and Water Quality

Under the CEQA Guidelines, a project may have a significant impact if the project would result in one or more of the following: (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; (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 offsite; (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; or (j) expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow.

Under the City's CEQA Thresholds Guide, the hydrology analysis must address: (1) surface water hydrology; and (2) groundwater level.

Water Quality

The Proposed Project would not violate any water quality standards, waste discharge requirements, or otherwise substantially degrade water quality. The impact would be less than significant. For the same reasons, Alternative 4's impacts would be less than significant.

Runoff from the Project Site does not directly discharge into Los Angeles River (or any other water body). Accordingly, runoff from the Project Site is considered a non-point source discharge for potential pollutants. Thus, the Proposed Project would not result in any impacts related to point-source discharge that could violate water quality standards.

The Project Site is nearly 100 percent impervious. Some existing undeveloped areas of the Project Site, including the paved parking areas and small areas of vegetation, would be replaced by new buildings and surfaces. The Project Site would be required to obtain a National Pollutant Discharge Elimination System ("NPDES") water quality permit from the Los Angeles Regional Water Quality Control Board. Implementation of appropriate project design features and compliance with local, state, and federal regulations, code requirements, and permit provisions would prevent both short term (construction) and long-term (operational) impacts to water quality.

During the Project's construction, sediment is usually the constituent of greatest potential concern, especially for construction activities during wet weather periods. The greatest risk of soil erosion during the construction phase occurs when the site disturbance peaks due to grading activity and removal and re-compaction or replacement of fill areas. Other pollutants that could affect surface-water quality during the Project construction phase include petroleum products (gasoline, diesel, kerosene, oil, and grease), hydrocarbons from asphalt paving, paints and solvents, detergents, fertilizers, and pesticides (including insecticides, fungicides, herbicides, and rodenticides). The Project Applicant would comply with the applicable requirements of the City's Building Code, which requires wet weather erosion control measures for construction during the rainy season.

To further minimize potential water quality impacts during the construction phase, the Project Applicant would be required to prepare and implement a Stormwater Pollution Prevention Plan ("SWPPP") in accordance with the NPDES General Permit for Discharges of Stormwater Associated with Construction Activity and Land Disturbance Activities. The SWPPP would include Best Management Practices ("BMPs") and erosion control measures to prevent pollution and avoid creating substantial additional sources of polluted runoff in storm water discharges during construction. The SWPPP would be subject to review and approval by the City for compliance with the City's Best Management Practices Handbook. All Project construction activities must also comply with the City's grading, excavation, and fill regulations, which require the implementation of grading and dust control measures. Since the Project's construction would disturb more than one acre of land, the Project Applicant would also be required to obtain coverage under the General Construction Activity Storm Water Permit ("GCASP"), which requires development and implementation of a SWPPP. Construction projects that include grading during the rainy season must also develop a Wet Weather Erosion Control Plan ("WWECP"). Through compliance with NPDES requirements and City Grading regulations, Project impacts related to water quality during construction would be less than significant.

With respect to the Project's operation, the Project's urban runoff could include the contaminants typically associated with urban development, including trace metals from pavement runoff and landscape maintenance debris that may be mobilized in storm runoff from driveway areas and landscaping, and in dry-season "nuisance flows" from landscape irrigation. Under the existing conditions, storm water runoff from the Project Site contains similar types of urban pollutants and is currently uncontrolled and under treated. Under the post-Project conditions, in accordance with NPDES requirements, the Project Applicant would be required to have a Project-specific storm water quality plan in place during the operational life of the Project to address the management of urban runoff from the Project Site. The storm water quality plan would include site design, source control, low-impact development, and treatment control BMPs. Final selection of BMPs in the plan would be coordinated with the City. The storm water quality plan would also be subject to the City's review and approval for compliance with the City's Development Best management Practices Handbook, Part B, Planning Activities. Given that the Project Site likely does not currently meet water quality standards because of the site's current uses, the quality of storm water drainage would likely improve at the Project Site with the Project's development. In sum, implementation of the storm water quality plan, and overall compliance with NPDES requirements would ensure that the Project's water quality impacts during operation would be less than significant. Since Alternative 4 would be built on the same site and comply with the same regulations, Alternative 4's impacts to water quality would be less than significant.

No mitigation measures are required, as no significant impacts associated with water quality have been identified.

Groundwater

Neither Alternative 4 nor the Proposed Project would 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. Therefore, no significant impact would occur.

Since the Project Site is nearly completely impervious, there is limited to no groundwater recharge currently occurring on the Project Site. The Project would not substantially change the impervious surface of the Project Site. Construction of the Project is not anticipated to require temporary dewatering for the approximately 36-foot deep excavations that would be required for the below-grade parking levels. Groundwater levels in the vicinity are noted to be approximately 100 feet below ground surface; thus, excavations for the Project would not be expected to encounter groundwater. However, if unanticipated groundwater is encountered during Project excavation work, the Project Applicant would be required to comply with the terms of Order No. R4-2013-0095, NPDES No. CAG994004 governing construction-related dewatering discharges. The Project will also be served by the municipal water and sewer system and no production wells as a water source would be installed. The Project would also not substantially deplete groundwater supplies or interfere substantially with groundwater recharge, yields, or flow directions. Therefore, no impacts to groundwater would occur. Since Alternative 4 would be constructed on the same Project Site and comply with the same regulations, its impacts would be similar and less than significant.

No mitigation measures are required, as no significant impacts associated with groundwater have been identified.

Drainage

Neither Alternative 4 nor the Proposed Project would substantially alter the existing drainage pattern of the Project Site or area that would result in substantial erosion or siltation on- or off-site. Therefore, no significant impact would occur.

The Project Site does not contain any water features, streams, or rivers. Similarly, runoff from the Project Site discharges to the local existing storm drain infrastructure and does no directly discharge to a stream or river. The Project would not alter the course of any stream or river. The Project would alter the on-site drainage patterns due to the development of buildings, podiums, and open space areas that would modify the elevations of the Project Site. However, this alteration would not result in on-site erosion or siltation because all runoff would be directed to areas of BMPs and/or storm drain infrastructure. The current drainage pattern from the Project Site includes the discharge of storm water runoff from the paved areas directly to the sidewalk and street via surface flow. The Project would not substantially alter the existing drainage pattern of the surrounding area in a manner that would result in substantial flooding on- or off-site. Therefore, no impacts related to drainage would occur. For the same reasons, Alternative 4's impacts to drainage would be substantially similar and less than significant.

No mitigation measures are required, as no significant impacts associated drainage have been identified.

Runoff

Neither Alternative 4 nor the Proposed Project would create or contribute to runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. Through compliance with existing regulations governing stormwater management, the impact would be less than significant.

A significant impact may occur if a project would increase the volume of storm water runoff to a level that exceeds the capacity of the storm drain system serving a Project Site. A Project-related significant adverse effect would also occur if a project would substantially increase the probability that polluted runoff would reach storm drains. There are three general sources of potential short-term construction-related storm water pollution association with the Project: (1) the handling, storage, and disposal of construction materials containing pollutants; (2) the maintenance and operation of construction equipment; and (3) earth-moving activities which, when not controlled, may generate soil erosion and the transportation of pollutants via storm runoff or mechanical equipment. Earth-moving activities that can greatly increase erosion processes are another source of stormwater pollution contamination. Generally, routine safety precautions for handling and storing construction materials can effectively mitigate the potential pollution of stormwater by these materials. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed, including applying water or other dust palliatives as necessary and reducing runoff into the storm drains through temporary diversions and barriers. Second, the area should be secured to control off-site migration of pollutants. These BMPs are part of existing regulatory requirements. When properly designed and implemented, these "good-housekeeping" practices would reduce short-term construction-related impacts to a less than significant level by controlling dust and erosion that may occur onsite and leaks from any construction equipment. The Project is also required to comply with the City's Low Impact Development BMPs, which are determined on a case by case basis by the Department of Public Works. Approval for development project and building/grading permits would not be granted or issued until appropriate and applicable stormwater BMPs are incorporated into the Project design plans.

With respect to the Project's operation, the Project would generate substances that could degrade the quality of water runoff. For example, chemical deposits by cars in the parking area could have the potential to contribute to metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, impacts to water quality would be reduced, as the Project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles and State Water Resources Control Board. Design criteria would also be incorporated into the Project to minimize the off-site conveyance of pollutants. Compliance with existing regulations would ensure that water quality impacts remain less than significant.

The Project is required to comply with the NPDES program as well as the requirements set forth in the LAMC. These regulations control water pollution by regulating point sources that discharge pollutants. Therefore, through compliance with existing regulations, the Project's impacts to runoff would be less than significant. Since Alternative 4 would be constructed and operated on the same site and comply with the same regulations, Alternative 4's impacts concerning runoff would be substantially similar and less than significant.

No mitigation measures are required, as no significant impacts related to runoff have been identified.

Place Housing Or Structure Within A 100-Year Flood Hazard Area

Neither Alternative 4 nor the Proposed Project would not 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. Therefore, no significant impact would occur.

The Project Site is not located within an area identified by the Federal Emergency Management Agency ("FEMA") as potentially subject to 100-year floods. The Project Site is not located within a City-designated 100-year or 500-year flood plain. The Project would not introduce people or

structures to an area of high flood risk. Therefore, the project would not contain any significant risks of flooding and would not have the potential to impede or redirect floodwater flows, and no impact would occur. Because Alternative 4 would be constructed on the same site, the impacts would be the same and less than significant.

No mitigation measures are required, as no impacts associated with placing housing within a 100-year flood hazard area have been identified.

Flooding, Including From Failure Of A Levee or Dam

Neither Alternative 4 nor the Proposed Project would expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of a failure of a levee or dam. Therefore, the impact would be less than significant.

The Project Site is located approximately 600 feet west of the Los Angeles River, which is contained in a flood control channel. The Project Site is within the City-designated potential inundation area of Los Angeles River flood control channel, as is much of Downtown and Central Los Angeles. The Project Site and the surrounding areas could be inundated with flood waters if the levees along the Los Angeles River channel were to fail, which is a remote possibility. According to the City of Los Angeles Safety Element, dams and reservoirs are monitored during storms and measures are instituted in the event of potential overflow. These measures apply to facilities within the City's borders and facilities owned and operated by the City within other jurisdictions. The Safety Element recognizes that inundation due to water storage facility failure is a potential hazard. However, the Baldwin Hills dam failure of December 14, 1963 and near collapse of the Van Norman Dam during the 1971 San Fernando earthquake resulted in strengthening of the federal, state and local design standards and retrofitting of existing facilities. No dams or reservoirs are located within the Project Site area. The Los Angeles River flood control channel is maintained by the U.S. Army Corps of Engineers (USACE), which is responsible for periodically analyzing its facilities for earthquake safety and potential failures. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing channel and drainage infrastructure are intended to ensure that all such facilities are capable of withstanding the maximum credible earthquake for the site. Flooding from other sources is not expected; thus the minimal risk of flooding from potential levee failure would not be exacerbated by the development of the Project. Thus, the failure of the Los Angeles River flood control channel is considered remote and does not present a significant risk of loss, injury or death to people or structures. Therefore, no impact related to risk of loss involving inundation resulting from the failure of a levee or dam would occur. Because Alternative 4 would be constructed on the same site, the impacts would be the same and less than significant.

No mitigation measures are required, as no significant impacts associated with flooding as a result of a failure of a levee or a dam have been identified.

Inundation by Seiche, Tsunami, or Mudflow

No impact would occur related to inundation by seiche, tsunami, or mudflow for the Project or Alternative 4.

A significant impact may occur if a project is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami) or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. The Project Site is not located in a Tsunami Hazard Area as identified in the Safety Element of the City's General plan. The Project Site is also not located in a Tsunami Inundation Zone as identified in the City's ZIMAS

Parcel Profile Report, and is located approximately 14 miles inland from the Pacific Ocean and not near nay other major water bodies. Therefore, risks associated with seiches or tsunamis would be considered extremely low at the Project Site. The Site is also not in or near a hillside area that could become a mudflow. No impact would occur. Because Alternative 4 would be constructed on the same site, the impacts would be the same and less than significant.

No mitigation measures are required, as no significant impacts associated with inundation by seiche, tsunami, or mudflows have been identified.

Cumulative Impacts

Neither Alternative 4 nor the Proposed Project, in conjunction with the Related Projects, would not result in a cumulative hydrology, water quality, and groundwater impact. Both Alternative 4 and the Project would have a less than significant impact with respect to all hydrology and water quality issues and its associated incremental impacts are therefore not considered cumulatively considerable. The project would implement new BMPs that would control storm water runoff quantity and quality. Other Related Projects in the area would also be required to adhere to regulatory requirements that control storm water and pollutant discharges and would be required to prepare and implement a SWPPP and/or Standard Urban Stormwater Mitigation Plan ("SUSMP"). Compliance with these standards would ensure that the Related Projects would further the objectives of applicable regional water quality plans. Further, the Project Site and surrounding areas are serviced by an MS4 system that is designed with capacity to handle 50 year storm flows from all areas in the developed condition. While Alternative 4, the Project and Related Projects may change the onsite land uses, they would remain urban developments planned or by the existing MS4 system. Also, future development projects within the Project area are likely to be subject to more stringent BMPS than what are in use under the existing conditions, and generally improve existing stormwater flows that discharge from currently vacant parcels or surface parking lots. As such, cumulative impacts to hydrology and water quality would not be cumulatively considerable.

No mitigation measures are required, as no significant cumulative impacts associated with hydrology, water quality, and groundwater impact have been identified.

Land Use and Planning

Under CEQA's Guidelines, a project could have a potentially significant impact related to land use and planning if it were to: (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 adopted for the purpose of avoiding or mitigating an environmental effect; or (c) conflict with any applicable habitat conservation plan or natural community conservation plan.

Under the L.A. CEQA Thresholds Guide, a project's potential impacts related to land use and planning must be made on a case-by-case basis considering the project's consistency with applicable land use plans and compatibility with the type of land uses within the project area.

Physically Divide An Established Community

Neither Alternative 4 nor the Proposed Project would not physically divide an established community. Therefore, no significant impact would occur. A significant impact may occur if a project is sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. For example, a project could divide an established community if it involved a continuous right-of-way such as a roadway which would divide a community and impeded access between parts of the community. Neither Alternative 4 nor the

Project is of a size or type to physically divide a community. Therefore, no significant impact would occur.

No mitigation measures are required, as no significant impacts associated with dividing an established community have been identified.

Consistency With Applicable Land Use Plans, Policies, And Regulations

The Proposed Project would not 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. The impact would be less than significant. Similarly, Alternative 4 would not conflict with applicable plans and have less than significant impacts.

The legal standard that governs consistency determinations with applicable land use plans states that a project must only be in "harmony" with the applicable land use plan to be consistent with that plan. (See *Sequoyah Hills Homeowners Assn. v. City of Oakland* ("Sequoyah Hills") (1993) 23 Cal.App.4th 704, 717-18.) As the Court explained in *Sequoyah Hills,* "state law does not require an exact match between a proposed subdivision and the applicable general plan." (Id. at p. 717.) To be "consistent" with a general plan, a project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning, the project must be "in agreement or harmony with the applicable plan." (*Id.* at pp. 717-18; see also *Greenbaum v. City of Los Angeles* (1984) 153 Cal.App.3d 391, 406; *San Franciscans Upholding the Downtown Plan v. the City and County of San Francisco* (2002) 102 Cal.App.4th 656, 678.) Further, "[a]n action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment." (*Friends of Lagoon Valley v. City of Vacaville* (2007) 154 Cal.App.4th 807, 817.)

As explained in Section 4.H, Land Use and Planning, and Section 6, Alternatives, of the Draft EIR, both Alternative 4 and the Proposed Project will be consistent with the following applicable policies **and**/or regulations and, therefore, no significant land use impacts would occur:

15. *Southern California Association of Governments ("SCAG") Compass Blueprint Growth Vision/Compass Blueprint 2% Strategy Areas ("Compass Blueprint 2% Strategy).*

16. *SCAG Regional Comprehensive Plan*. Both Alternative 4 and the Project are consistent or partially consistent with applicable policies in the SCAG Regional Comprehensive Plan, including policies related to (i) land use and housing; (ii) open space and habitat; (iii) water; (iv) energy; and solid waste.

17. *SCAG Regional Transportation Plan/Sustainable Communities Strategy ("SCAG 2012-RTP/SCS").* The SCAG 2012-2035 RTP/SCS plans to concentrate future development and provide higher intensity development in proximity to transit hubs to reduce vehicle miles traveled and GHG emissions from personal vehicles. While the RTP/SCS focuses on transportation investments in the SCAG region, the Project and Alternative 4 would be consistent with the applicable 2016-2040 RTP/SCS policies.

18. *City of Los Angeles General Plan – Framework Element Land Use Policies.* The Project and Alternative 4 would be consistent with many of the applicable policies.

19. *City of Los Angeles General Plan – Health and Wellness Element.* The Project and Alternative 4 would be consistent with many of the applicable policies.

20. *City of Los Angeles General Plan – Housing Element.* The Project and Alternative 4 would be consistent with many of the applicable policies.

21. *Central City North Community Plan.* The Project Site is designated for Limited Manufacturing land uses. Since the Project would include a mix of live/work, office, cultural, and retail/restaurant uses, the Project would be inconsistent with the existing Heavy Manufacturing land use designation. Therefore, as part of the Project, the Applicant is seeking a General Plan Amendment to change the land use designation from Heavy Manufacturing to Regional Center Commercial. Of the 30 Community Plan policies that are applicable to the Project, the Project would be consistent with 26 policies and either inconsistent or partially consistent with the remaining four policies. Because state law does not require an exact match, the Project is sufficiently consistent with the Community Plan. Alternative 4 would be consistent with the same policies in the Community Plan.

22. *Central City North Community Plan – Design Policies*. The Project and Alternative 4 would implement and be consistent with the applicable Community Plan design policies, including the applicable commercial, multiple residential, and community design and landscaping policies.

23. *City of Los Angeles General Provisions and Zoning Code*. The Project Site is located in the M3 (Heavy Industrial) zone. The Project would include a mix of live/work, office, cultural, and retail/restaurant land uses that would be inconsistent with the existing M3 zoning for the Project Site, because of the proposed live/work uses. Therefore, as part of the Project, the Applicant is seeking a Zone Change from M3-1-RIO to C2-2-RIO, which would allow for the Project's proposed mix of uses. With respect to height and density limitations, with approval of the Project's requested entitlements, the Project's and Alternative 4's maximum height and FAR would be consistent with the zoning for the Project Site.

24. *Los Angeles River Improvement Overlay District*. Prior to issuance of a building permit, the Project Applicant would be required to consult with the Department of City Planning to obtain an Administrative Clearance for compliance with all of the applicable regulations of the Los Angeles River Improvement Overlay District. As such, the Project and Alternative 4 would be required to comply with the Los Angeles River Improvement Overlay District.

25. *Parking.* With approval of the requested ZAD, the Project and Alternative 4 would be designed and constructed to meet the Code required vehicular and bicycle parking spaces, and as such, no impact would occur with respect to parking.

26. *Walkability Checklist*. The Project and Alternative 4 would be consistent with all of the guidelines in the walkability checklist.

27. *Citywide Design Guidelines*. The Project and Alternative 4 would be consistent with most of the Citywide Design Guidelines.

28. *City of Los Angeles Do Real Planning Principles.* The Project and Alternative 4 are compatible with the applicable good-planning practices set forth in the City's Do Real Planning publication. The Project and Alternative 4 will be consistent with those principles as it would provide a live/work mixed-use development in close walking and biking proximity to the Little Tokyo/Arts District Metro Gold Line Station and in close proximity to existing bus lines and other commercial uses located in the Arts District. Further, the Project and Alternative 4 would incorporate sustainable building practices to

eliminate pollution and reduce waste. The Project and Alternative 4 would also provide approximately 78 short-term and 621 long-term bicycle parking spaces that would encourage alternative modes of transportation to and from the Project Site.

Thus, as set forth fully in the Draft EIR, the Project and Alternative 4 would be in agreement and harmony with applicable plans. Therefore, no mitigation measures are required, as no significant impacts associated with applicable land use plans, policies, or regulations have been identified.

Habitat Conservation Plan Or Natural Community Conservation Plan

Neither Alternative 4 nor the Project would conflict with a habitat conservation plan or natural community conservation plan. The Project Site has been previously developed and is located in an urbanized area. There is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that apply to the Project Site. Therefore, implementation of the Project and Alternative 4 would not conflict with any habitat conservation plans and no impacts would occur.

No mitigation measures are required, as no significant impacts associated with an applicable habitat conservation plan or natural community conservation plan have been identified.

Compatibility Analysis

The Project would be compatible with its surrounding environment. Therefore, no significant impact would occur. Alternative 4 would similarly cause no significant impacts.

The physical compatibility of the Project with its surrounding environs is based on an analysis of proposed uses and improvements and their potential for on- and off-site impacts. As described in the findings for those substantive areas elsewhere in this document, the Project is physically compatible with its environs. A project's functional compatibility is defined as the capacity for adjacent, yet dissimilar land uses to maintain and provide services, amenities, and/or environmental quality associated with such uses. Potentially significant functional land use compatibility impacts may be generated when a project hinders the functional patterns of use and relationships associated with existing land uses. While the Project would change the land use character of the Project Site by replacing the warehouse that exists on the Project Site, the Project would increase both the housing and employment opportunities in the area and would provide greater density near transit service. The Project is consistent with its surrounding community, the Arts District, because it will provide substantial employment opportunities and live/work units, consistent with the historical uses of the Arts District. Although the Project would alter the visual character of the Project area by removing the existing industrial building and redeveloping the Project site with a mixed-use building, this alteration in the visual character would not equate to a degradation. As explained in Section 4.B, Aesthetics, and Section 6, Alternatives, of the Draft EIR, neither the Project nor Alternative 4 would create significant impacts related to aesthetics. The pedestrian paseo and commercial uses along ground floor frontages are also consistent with the Arts District community, and are consistent with many policies set forth in the City's Walkability Checklist. Alternative 4's design with a taller live/work tower would be consistent with the surrounding community because it will be constructed away from street frontages, will reduce pedestrian-level massing, and will further facilitate access to ground-level uses, consistent with the Arts District's historical uses and the City's Walkability Checklist. Under the Project site's existing zoning (M3-1), which corresponds to height district 1, there is no existing height limit for the Project site. The new zoning requested for the Project site (C2-2D), which corresponds to height district 2, does not have any height limits. The Project would be limited, however, to a height of 370 feet through the "D" limitation under LAMC section 12.32-G. Therefore the Project and Alternative 4 would be consistent with the City's

development standards with respect to height. With implementation of mitigation, the Project's local construction emissions to below SCAQMD's significance thresholds, and would ensure that Project air quality impacts related to sensitive receptors would be less than significant. Mitigation would also reduce the noise levels associated with construction of the Project to the maximum extent that is technically feasible, and temporary and intermittent construction noise levels at the location of sensitive receptors near the Project Site would be less than significant. The Project will not hinder the functional patterns of use and relationships associated with the existing land uses. The Project and Alternative 4 would be in agreement and harmony with policies and objectives of the City's General Plan, including the Central City North Community Plan, as explained in Section 4.H, Land Use and Planning, and Section 6, Alternatives, of the Draft EIR. Thus, the Project and Alternative 4 would be substantially compatible with the surrounding land uses and impacts related to land use incompatibility would be less than significant.

No mitigation measures are required, as no significant impacts associated with compatibility have been identified.

Cumulative Impacts

Neither Alternative 4 nor the Proposed Project, in conjunction with the Related Projects, would not result in a significant cumulative land use impact.

Cumulative land use impacts could occur if the other Related Projects would result in incompatible land uses, or result in land uses that are inconsistent with adopted land use plans when combined with the impacts of the Project or Alternative 4. Given the build-out conditions of the greater Los Angeles region, including the Project area, cumulative development likely would convert existing underutilized properties in the Los Angeles area to revitalized higher-density development to respond to the need for housing, sources of employment, and associated retail land uses. Both Alternative 4 and the Project would implement important local and regional goals and policies for the Los Angeles area, which would assist the City in achieving short- and long-term planning goals and objectives. Likewise, future development associated with the Related Projects would support the furtherance of the build out of Los Angeles and the surrounding area. This is consistent with SCAG and other regional policies for promoting more intense land uses adjacent to transit stations and job centers, providing a variety of housing options, and increasing the number of retail and commercial uses. Further, all related projects in the City would be subject to the same local development and mitigation standards as the Projects. Therefore, neither Alternative 4 nor the Proposed Project would combine with any of the Related Projects to create a cumulatively significant land use impact and cumulative impacts.

No mitigation measures are required, as no significant cumulative impacts associated with land use have been identified.

Mineral Resources

The Proposed Project would cause no impacts to mineral resources. Similarly, Alternative 4 would cause no such impacts. Under the CEQA Guidelines, a project may have an impact to mineral resources if it will (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; or (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.

The Project Site is located within an area classified as MRZ-2, defined as areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence. Although no oil wells exist or are known to

have previously existed on or immediately adjacent to the Project Site, plugged wells do exist within a 1,500-foot radius of the site. The Project Site is not located within an Oil Drilling/Surface Mining Supplemental Use District. Should any future mineral resource be discovered on or near the Project Site, development of the Project would not preclude the mineral's extraction, nor would it alter the potential utility of any minerals located beneath the Site. Furthermore, the Project Site is developed and located in an urbanized area. Therefore, the Project would have no impact with respect to loss of availability of a known regionally-important mineral resource or locally-important mineral resource. Therefore, no impacts would occur. Because Alternative 4 would be constructed on the same Project Site, it would also not cause any impacts to mineral resources.

No mitigation measures are required because no significant impacts related to mineral resources have been identified.

Noise

Under CEQA's Guidelines (Appendix G), a project would have a significant impact on noise if it would cause any of the following conditions to occur: (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 projects; (d) a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project; (e) for a project located within an airborne land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airstrip, expose people residing or working in the project area to excessive noise levels; or (f) for a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels.

Under the L.A. CEQA Thresholds Guide, a project would normally have a significant impact on noise levels from construction if the following occurs: (a) construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use; (b) construction activities lasting more than ten days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or (c) construction activities would exceed the ambient noise levels by 5dBA at a noise sensitive use between the hours of 9:00 PM and 7:00 AM Monday through Friday, before 8:00 AM or after 6:00 PM on Saturday, or anytime on Sunday. Additionally, a project would normally have a significant impact on noise levels from project operations if the project causes the ambient noise levels measured at the property line of affected uses to increase by 3dBA in Community Noise Equivalent Level ("CNEL") to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase.

Operational Noise

The Project's operation will not expose persons to or generate noise levels in excess of applicable standards of the applicable CEQA thresholds of significance. Impacts would be less than significant. Similarly, impacts for Alternative 4 would be less than significant.

The Project's operations would produce both direct and indirect noise impacts on the Project Site from residential-related activities, as well as direct noise impacts from stationary noises associated with building operations, such as heating, ventilation, and air conditioning (HVAC) systems, and indirect noise impacts from vehicles traveling on local roads to access the Project Site. Parking noise can typically generate an instantaneous noise level of up to an approximate 58.1 dBA at 50 feet. The Proposed Project would provide enclosed subterranean, at-grade, and second level parking. Enclosed parking noise, such as door slams, is typically not audible from

exterior at- or above-grade sensitive receptors. However, there may be a slight increase in the frequency of parking noise from street parking. Given the ambient noise levels of the surrounding sensitive receptors, the increase in noise at each sensitive receptor would be less than 3 dBA, and would not normally be audible. Specifically, the nearest sensitive land use, Molino Lofts residences, are located 60 feet west of the Project site. At 60 feet of distance, the Project's parking garage-related noise levels would be 51.8 dBA Leq. The existing ambient noise level at this receptor is 62.5 dBA Leq. With the addition of parking garage-related noise, the composite noise level at this receptor would be 62.9 dBA Leq, only a 0.4 dBA increase. This potential noise impact is considered less than significant. The Project's peak hour traffic would not cause any roadway segment to experience a noise increase of 3 dBA to or within its respective "normally unacceptable" or "clearly unacceptable" noise category, or any 5 dBA or greater noise increase overall, the Project's off-site operational noise impact would be considered less than significant.

For direct noise, section 41.40 and Chapter XI, Articles 1 through 6, of the LAMC require that noise generated by mechanical equipment not exceed 5 dBA ambient noise levels at adjacent property lines. Large ground level heating, ventilation, and HVAC systems typically generate noise levels between 50 and 65 dBA at 50 feet. Rooftop equipment typically produces noise levels of up to approximately 56 dBA at 50 feet. The nearest land use would be the residences located approximately 20 feet west of the Project Site, across Mateo Street. Due to the proximity of the nearby sensitive receptors, HVAC systems could increase noise levels marginally if mounted on the ground level. However, the height difference between the Proposed Project and nearby sensitive receptors (with the Proposed Project being significantly taller than surrounding receptors) makes significant noise increases unlikely since HVAC systems will be mounted on the Project rooftop. For example, the existing ambient noise level of the receptor was measured to be 62.9 dBA Leq. With the addition of HVAC noise, the noise level at this receptor would be 63.0 dBA, a 0.1 dBA increase and a less than significant impact. Given the proposed location of HVAC units on the roof of the Proposed Project, this noise impact from stationary sources is considered less than significant.

Since the sources of operational noise for Alternative 4 are the same as described above in this finding, Alternative 4 would not cause any significant impacts due to operational noise.

No mitigation measures are required, as no significant noise impacts associated with the Project's operation have been identified. Project Design Feature NOI-PDF-1 will ensure operational impacts are less than significant:

Project Design Feature

NOI-PDF-1 – The HVAC system and associated mechanical equipment proposed for the Project will be located on the roof of the building and not at ground level.

Construction Groundborne Vibration

The Project's construction would not generate vibration levels that would expose persons to excessive groundborne vibration or groundborne noise levels. The impact would be less than significant. For the same reason, Alternative 4 would also have less than significant impacts.

There are no major stationary sources of vibration near the Project Site. The Project's construction activities would generate groundborne vibration. The nearest residential structures to the Project Site would be approximately 20 feet from occasional heavy equipment activity and could experience vibration levels up to 0.106 inches per second. Vibration levels at this and other receptors would not exceed the potential building damage threshold of 0.2 inches per second for non-engineered buildings. Thus, the impact of construction-related groundborne

vibration at nearby residential land uses is therefore considered less than significant. Best practices will minimize any impacts that could annoy local residents and workers. Since construction of Alternative 4 would be similar, Alternative 4's impacts would be less than significant.

No mitigation measures are required, as no significant impacts associated with vibration from construction have been identified. However, Mitigation Measures NOI-MM-10 and NOI-MM-11 would further reduce the Project's less than significant construction related groundborne vibration levels. These mitigation measures are best management practices that will minimize impacts at nearby sensitive receptors.

Mitigation Measures

NOI-MM-10 – Construction activities shall utilize rubber tired equipment in place of steel-track equipment whenever feasible.

NOI-MM-11 – The noise disturbance coordinator identified in Mitigation Measure NOI-MM-8 shall also be responsible for receiving local complaints about construction vibration. The disturbance coordinator shall determine the cause of the vibration complaints and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs, legible at a distance of 50 feet, at the construction site shall list the telephone number for the disturbance coordinator.

Alternative 4 will comply with these Mitigation Measures.

Operational Vibration Levels

The Project's operation would not generate vibration levels that would expose persons to excessive groundborne vibration or groundborne noise levels. The impact would be less than significant. Alternative 4 would similarly result in less than significant impacts.

Neither Alternative 4 nor the Proposed Project would include significant stationary sources of groundborne vibration, such as heavy equipment operations. Operational groundborne vibration in the Project vicinity would be generated by vehicular travel on the local roadways. However, similar to existing conditions, traffic-related vibration levels would not be perceptible by sensitive receptors. Therefore, the Project's operational vibration impacts would be considered less than significant. For the same reasons, Alternative 4's impacts would be less than significant.

No mitigation measures are required, as no significant impacts associated with vibration from operation of the Project or Alternative 4 have been identified.

Within Airport Land Use Plan or 2 Miles of a Public Airport/Private Airstrip

Neither Alternative 4 nor the Proposed Project would not expose people working or residing in the project area to excessive noise associated with an airport land use plan or within two miles of a public airport. Therefore, no significant impact would occur.

There are no airports or private airstrips within a two-mile radius of the Project Site, and the Project Site is not within any airport land use plan or airport hazard zone. Neither Alternative 4 nor the Project would expose people to excessive noise levels associated with airport uses. Therefore, no significant impact would occur.

No mitigation measures are required, as no significant impacts associated with excessive noise associated with an airport land use plan have been identified.

Population and Housing

Under CEQA's Guidelines (Appendix G), a project may have a significant environmental impact if the project would result in one or more of the following: (a) induce substantial 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; or (c) displace substantial numbers of people, necessitating the construction or replacement housing elsewhere.

Under the L.A. CEQA Thresholds Guide, the determination of significance for a project's impacts on population, housing, and employment shall be determined on a case-by-case basis considering the following factors: (a) the degree to which the project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; (c) the extent to which growth would occur without implementation of the project; (d) the total number of residential units to be demolished, converted to market rate, or removed through other means as a result of the project, in terms of net loss of market-rate and affordable units; and (e) the current and anticipated housing demand and supply of market rate and affordable housing in the project area.

Construction

Neither the construction of the Project nor Alternative 4 would induce substantial population or housing growth, either directly or indirectly. There would be no significant impacts.

Construction of the Project or Alternative 4 would result in increased employment opportunities in the construction field, which could potentially result in increased permanent population and demand for housing in the vicinity of the Project Site. However, the employment patterns of construction workers in Southern California are such that it is not likely that they would relocate their households as a consequence of the construction employment associated with the Project. The construction industry differs from most other industry sectors. For example, there is no regular place of work in the construction industry, many construction workers are highly specialized and move between job sites as dictated by demand for their skills, and workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process. Therefore, Project-related construction workers would not be likely to relocate their place of residence as a consequence of working on the Project or Alternative 4. Such construction would not represent a permanent or substantial new employment generator that would cause growth. There would be no significant housing or population impacts from construction of the Project or Alternative 4 and, therefore, no impact related to construction-related population growth would occur.

No mitigation measures are required, as no significant impacts associated with substantial population or housing growth related to construction have been identified.

Operation

Neither Alternative 4 nor the Proposed Project would induce substantial population or housing growth, either directly or indirectly. Therefore, this impact would be less than significant.

The proposed office, retail, and restaurant land uses within the Project would generate a net increase of approximately 43 employees after the existing warehouse uses on-site are removed. Alternative 4's non-residential uses would generate a net increase of 303 employees. It is likely that the existing availability of employees in the Project area would fill these new jobs and would not draw new people to the City to fill the jobs. Thus, operation of the Project or Alternative 4 would not cause an increase in population. Therefore, no significant impact related to operation-related indirect population growth would occur.

The Project would not induce substantial growth that exceeds growth forecasted for the area, nor would it introduce unplanned infrastructure or accelerate development in an undeveloped area that would result in an adverse physical change in the environment. The Project Site is currently developed with an industrial building and is located within an urbanized area in the City. Thus, the construction of a potential growth-inducing roadway or other infrastructure extensions would not be required. As development of the Project would not induce substantial indirect population growth and would be supported by the existing infrastructure such as roadways, no impact would occur.

With respect to direct population and housing growth, the Project's construction of 600 additional live-work units at the Project Site would result in an increase in up to approximately 1,662 new permanent residents in the City of Los Angeles at the Site. Alternative 4 would result in an increase of 1,316 new residents at the Site. This proposed increase in housing units and population would be consistent with the SCAG forecast of 364,800 additional households and approximately 763,900 additional persons in the City of Los Angeles between 2012 and 2040. During the 2015 to 2020 forecast timeframe, the population and housing pf the Project and Alternative 4 would represent approximately 2 to 3 percent of the City's projected population and housing growth (respectively). During the 2012 to the 2040 forecast timeframe, the population and housing of the Project and Alternative 4 would represent less than one percent of the City's projected growth. The Project would contribute 600 dwelling units toward the projected need of 11,490 dwelling units in the Community Plan area, while Alternative 4 would contribute 475 dwelling units toward this projected need. It should be noted that the Project's percentage of forecast citywide population growth conservatively assumes that all 1,662 projected residents of the Project would be in-migrants to the City and would not be relocating to the Project from elsewhere within the City of Los Angeles. In addition to being consistent with household growth forecasts for the City and the Community Plan and the population growth associated with the projected housing growth, the Project and Alternative 4 would be consistent with all of the applicable residential policies set forth in Community Plan. The Project and Alternative 4 responds to the unmet housing demand in both the City and Community Plan area. Thus, while Alternative 4 and the Project would generate a residential population at the Site through the development of new housing, neither Alternative 4 nor the Project would substantially induce housing growth beyond forecasted levels. Therefore, impacts related to population and housing growth would be less than significant

No mitigation measures are required, as no significant impacts associated with substantial population or housing growth related to the Project's operation have been identified.

Displace Housing or Persons

Neither Alternative 4 nor the Proposed Project would displace substantial numbers of existing housing, necessitating the construction of replacement housing. Therefore, no significant impact would occur. The Project Site does not include existing residential uses and would not displace any existing housing or displace people. Therefore, no impact would occur. Because Alternative 4 would be constructed on the same Site, it would also cause no such impacts. No mitigation measures are required, as no significant impacts associated with displacing existing housing or requiring new housing have been identified.

Cumulative Impacts

Neither Alternative 4 nor the Proposed Project, in conjunction with the Related Projects, would contribute to significant cumulative impacts associated with population and housing or employment growth.

The City analyzed the Project's cumulative impacts on population and housing considering the Related Projects located within the City, since that is the jurisdiction where the Project is located. A total of 183 cumulative projects were identified in the study area. These projects include the development of approximately 51,676 dwelling units in the downtown Los Angeles area. It is possible that some of these cumulative project sites already include residential land uses that would be removed with implementation of the cumulative projects, and as such, the total net number of dwelling units to be developed would be smaller. However, for a conservative analysis, it is assumed that all 51,676 dwelling units would be net new units. With the Proposed Project added to this total, the number of cumulative housing units would be 52,276 units, generating approximately 144,805 cumulative residents (using the 2.77 persons per household rate as an average). That number would be slightly less under Alternative 4 since fewer live/work units would be developed. For a conservative analysis, it is assumed that these cumulative residents would be new to the City. This cumulative housing and associated residential population increase would represent approximately 14.3 percent and 19 percent (respectively) of the projected increase in housing and population between the years 2012 and 2040. This cumulative housing growth would further the City's objective of providing 95,023 housing units within the City by 2021. Thus, cumulative housing and population growth would fall within projected levels for the City. Therefore, cumulative impacts related to population and housing would be less than significant.

No mitigation measures are required, as no significant cumulative impacts associated with housing or employment growth have been identified.

Public Services – Fire Protection Facilities

Under CEQA's Guidelines (Appendix G), a project would have a significant impact if the project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection.

Under the City's CEQA Thresholds Guide, the determination of significance levels for a project's impact on fire protection services shall be made on a case-by-case basis considering whether the project would require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service.

Construction

Neither the construction of Alternative 4 nor the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts would be less than significant. Alternative 4 would also not result in significant impacts.

Construction activities associated with the Project or Alternative 4 may temporarily increase demand for fire protection and emergency medical services, and may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding

activities, and chemical reactions in combustible materials and coatings. However, in compliance with Occupational Safety and Health Administration and Fire and Building Code requirements, construction managers and personnel would be trained in fire prevention and emergency response. Fire suppression equipment specific to construction would be maintained on-site. Additionally, construction would comply with applicable existing codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Therefore, in light of State and City regulations and code requirements that would in part require personnel trained in fire prevention and emergency response, maintenance of fire suppression equipment, and implementation of proper procedures for storage and handling of flammable materials, construction impacts on fire protection and emergency medical services would be less than significant.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and by necessitating partial lane closures during street improvements and utility installations. These impacts, while potentially adverse, are considered to be less than significant because the impacts are temporary, will be minimized through good housekeeping procedures by construction crews, and any temporary lane closure impacts will be addressed through the Construction Traffic Management Plan. Even with the Construction Traffic Management Plan, it is accepted that the Project would incrementally increase traffic, which could potentially delay emergency response times. As noted above, there are a number of factors that influence emergency response times in addition to traffic, including alarm transfer time, alarm answering and processing time, mobilization time, risk appraisal, geography, distance, traffic signals, and roadway characteristics.

Overall, construction is not considered to be a high-risk activity, and the LAFD is equipped and prepared to deal with construction-related traffic and fires should they occur. Project construction would not be expected to tax fire-fighting and emergency services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD, due to the limited duration of construction activities and compliance with applicable codes. Therefore, impacts associated with construction of the Project or Alternative 4 would be less than significant.

No mitigation measures are required, as no significant impacts associated with fire protection facilities from construction have been identified.

Operation

Neither Alternative 4 nor the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Therefore, no significant impacts would occur.

Both Alternative 4 and the Project would generate new residents, visitors, and employees and would also increase the amount of developed square footage on the Project Site. Therefore, both Alternative 4 and the Project could result in an increased need for fire protection and emergency medical services at the Project Site. However, neither Alternative 4 nor the Project would create the need for new or physically altered fire protection facilities. Further, an analysis of the criteria for determining a project's impacts to fire protection services (e.g. fire flow, response distance and time, and emergency action) demonstrated that the operation of the Project or Alternative 4 will have less than significant impacts. With respect of fire flow, the Los Angeles Department of Water and Power's Water Operations Division would perform a detailed fire flow study at the time of permit review to determine whether further water system or site-specific improvements would be necessary. Hydrants, water lines, and water tanks would be

installed per Division 7, Section 57.09.06 of the Fire Code requirements for the Project. The Project Applicant would also be required to submit the proposed plot plans for the LAFD to review for compliance with the City's Fire Code, California Fire Code, City's Building Code, and National Fire Protection Association standards to ensure no undue fire hazard would be created. The Project Site is not located within an Inadequate Fire Hydrant Service Area recognized by the City. As such, with respect to fire flows, fire protection services would be adequate and the associated impact would be less than significant.

With respect to response distance and time, the nearest fire station with an engine is Station No. 4, approximately 0.9 mile away from the Project Site. The LAFD's ability to provide adequate fire protection and emergency response services to a site is determined by the response distance and the degree to which emergency response vehicles can successfully navigate the given accessways and adjunct circulation system, which is largely dependent on roadway congestion and intersection level of service (LOS) along the response route. The Project Site is located within the maximum acceptable response distances for both fire engines and truck companies shown in Table 4.K.1-2 and fire protection would be considered adequate by LAFD standards. Therefore, the impact of the Project and Alternative 4 upon emergency response distance would be less than significant.

Further, LAFD has recently been taking a number of steps to improve their related systems, processes and practices. Upgrades underway or pending include: installation of automated vehicle locating systems on all LAFD apparatus; replacement of fire station alerting systems that control fire station dispatch audio, signal lights, and other fire station alerting hardware and software; development of a new computer aided dispatch system to manage fire and emergency medical service incidents from initial report to conclusion of an incident; and, use of traffic pre-emption systems. A traffic pre-emption system allows the normal operation of traffic lights to be preempted by an emergency vehicle to improve response times by stopping conflicting traffic in advance, providing the emergency vehicle the right-of-way. In addition to these improvements, emergency response is also routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternate routes, and multiple station response. With these mobility features that can reduce traffic delays, impacts on response times are considered less than significant.

For emergency access, the Project Applicant is required to submit the proposed plot plans for the Project to LAFD for review and compliance with the City's Fire Code, the California Fire Code, the City's Building Code, and National Fire Protection Association standards to ensure that the Project would not create an undue fire hazard. The Project Applicant would consult with neighboring land uses and the emergency response plan would include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. Additionally, the Project Site is located within one mile of two hospitals, which house 24-hour emergency departments.

Neither Alternative 4 nor the Project would conflict with, or impede implementation of, any of the policies or goals related to fire protection described in the Los Angeles Fire Protection and Prevention Plan, or the Central City North Community Plan, which describes the planning of facilities. Both Alternative 4 and the Project will also generate revenue into the City's General Fund, which would help the LAFD achieve progress toward its goal to ensure adequate fire facilities and protective services for existing and future population and land uses.

LAFD review and compliance with applicable regulations is a legal prerequisite, and Mitigation Measure FIR-MM-1 restates this requirement. The Project would also generate revenues to the City's General Fund (e.g., in the form of property taxes and sales tax revenue) that could be applied toward the provision of new fire facilities and related staffing, as deemed appropriate.

Thus, the impact of the Project and Alternative 4 upon emergency response distances would be less than significant.

Furthermore, the Project Applicant would be required to submit an emergency response plan for approval by the LAFD, to help ensure that construction and operations would not impede fire access to and from the Project Site, which would create the need for new or physically altered facilities. For the reasons listed above, impacts related to emergency access and performance objectives would be less than significant.

To ensure that fire protection services are adequate within the proposed buildings and around the Project Site, Project Design Features FIR-PDF-1 through FIR-PDF-4 would be included. These features allow the LAFD to ensure that neither the Project nor Alternative 4 will increase demand on the fire department to the extent that a new or significantly expanded facility is needed, the construction of which may cause a significant impact on the environment. Mitigation Measure FIR-MM-1 contains the recommendations made by the LAFD during their initial review of the Proposed Project.

Overall, as described above, neither Alternative 4 nor the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection.

As a legal prerequisite, LAFD review and compliance with applicable regulations is requires as set forth in Mitigation Measure FIR-MM-1. Furthermore, to ensure that fire protection services are adequate within the proposed buildings and around the Project Site, Project Design Features FIR-PDF-1 through FIR-PDF-4 would be included.

Mitigation Measure

FIR-MM-1 – Submittal of a plot plan for approval by the LAFD either prior to the recordation of a final map or the approval of a building permit shall be required. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

In addition, the following recommendations of the LAFD relative to fire safety shall be incorporated into the building plans:

- Access for Fire Department apparatus and personnel to and into all structures shall be required.

- The entrance to a residence lobby must be within 50 feet of the desired street address curb face.

- Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units.

- The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

- No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

- The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.

- Building designs for multi-storied residential buildings shall incorporate at least one access stairwell off the main lobby of the building; but, in no case greater than 150 feet horizontal travel distance from the edge of the public street, private street or Fire Lane. This stairwell shall extend unto the roof.

- Entrance to the main lobby shall be located off the address side of the building.

- Any required Fire Annunciator panel or Fire Control Room shall be located within 50 feet of the visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department.

- Where rescue window access is required, provide conditions and improvements necessary to meet accessibility standards as determined by the Los Angeles Fire Department.

- Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

- The width of private roadways for general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky.

- Fire lanes, where required, and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

- Submit plot plans indicating access road and turning area for Fire Department approval.

- Adequate public and private fire hydrants shall be required.

- Standard cut-corners will be used on all turns.

- Any roof elevation changes in excess of three feet may require the installation of ships ladders.

- The Fire Department may require additional roof access via parapet access roof ladders where buildings exceed 28 feet in height, and when overhead wires or other obstructions block aerial ladder access.

- All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued.

- Plans showing areas to be posted and/or painted “FIRE LANE NO PARKING” shall be submitted and approved by the Fire Department prior to building permit application sign-off.

- Electric Gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety granting a Certificate of Occupancy.

- All new buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety communication systems of the jurisdiction at the exterior of the building. This section shall not require improvement of the existing public safety communication systems.

- Helicopter landing facilities are required on all high-rise buildings in the City in accordance with the recently revised Fire Protection Bureau Requirement 10.

- Each standpipe in a new high-rise building shall be provided with two remotely located fire department connections (FDCs) for each zone in compliance with NFPA 14-2013, Section 7.12.2.

Alternative 4 would comply with this measure.

Project Design Features

FIR-PDF-1 – The construction contractors and work crews shall properly maintain the mechanical equipment according to best practices and the manufacturers' procedures, ensure proper storage of flammable materials, and cleanup of spills of flammable liquid.

FIR-PDF-2 – If there are partial closures to streets surrounding the Project Site, flagmen shall be used to facilitate the traffic flow until the street closure around the construction is complete.

FIR-PDF-3 – During demolition and construction, LAFD access from major roadways shall remain clear and unobstructed.

FIR-PDF-4 – The design of the Project Site shall provide adequate access for LAFD equipment and personnel to the structures.

Alternative 4 will also incorporate these Project Design Features.

Cumulative Impacts

Neither Alternative 4 nor the Proposed Project would result in cumulatively considerable adverse physical impacts associated with the provision of new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Cumulative impacts would be less than significant.

Development of either Alternative 4 or the Project in conjunction with the Related Projects would increase demand for fire protection services based on an increase in residential population and employees in the Project area. However, due to the large geographic scope of the location of the Related Projects, some would be served by additional LAFD stations that differ from the Project. Cumulative development requires LAFD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. The Related Projects within the City would also be required to consult with the LAFD and would be subject to the requirements of the City's Fire Code, including the requirement to install automatic fire sprinkler systems if a project is located at a distance to the nearest fire station that exceeds the LAFD required response distance. The Related Projects would also contribute to funding fire protection services in the area by generating annual revenue to be deposited into the City's General Fund. While the Related Projects may create demand on fire protection staffing,

equipment, or facilities such that a new station would be required, since the Project does not create such demand, its contribution to those impacts is not cumulatively considerable.

No mitigation measures are required, as no cumulative significant impacts associated with fire protection facilities have been identified.

Public Services – Police Services

Under CEQA's Guidelines (Appendix G), a project could have a significant environmental impact if the project would result in substantial adverse physical impacts with the provision of new or physically altered police protection facilities, need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection.

Under the City's CEQA Thresholds Guide, the determination of significance for the Project's impacts on police protection shall be made on a case-by-case basis, considering the following factors: (a) the population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for police services anticipated at the time of project buildout compared to the expected level of service available; (c) whether the project includes security and/or design features that would reduce the demand for police services.

Cumulative Impacts

Neither Alternative 4 nor the Proposed Project, in conjunction with the Related Projects, would result in cumulatively considerable adverse physical impacts associated with the provision of new or physically altered police protection facilities in order to maintain acceptable service rations, response times, or other performance objectives. Therefore, this impact would be less than significant.

Implementation of either Alternative 4 or the Project in conjunction with the Related Projects would increase demand for police protection services based on an increase in resident population. It is estimated that the cumulative projects would generate approximately 144,805 residents and 52,276 housing units. Many of the cumulative projects listed would be served by the Central Community Police Station. However, due to the relatively large geographic scope of the cumulative project locations, some would be served by other police stations. In order to maintain existing officer-to-resident ratios, and assuming that all of the cumulative projects would be served by the Central Community Police Station, this cumulative residential population growth within the study area would result in a need for 934 additional officers within the Central Area. The Central Community Police Station has 397 sworn police officers. The addition of 934 officers to maintain the existing ratio would more than double existing Central Area staff levels. Consequently, the demand for 934 additional officers to maintain current resident service ratios would likely require the expansion of the existing station or construction of a supplemental station.

The cumulative projects would generate approximately 3,071,894 square feet of retail, 7,361,659 square feet of office, 548,794 square feet of restaurant, and 32,140 square feet of museum uses. These uses (retail, office, restaurant, and museum/cultural) are the same uses as the Project or Alternative 4, and thus may combine to create an impact via the generation of new employment within the study area. Other employee generators proposed for the study area include hotel, manufacturing/industrial, market/pharmacy/health club, and sports complex uses. Because the reported crime data does not reflect crimes committed only by residents, the nonresident (employee) population is also used when projecting crime statistics. Therefore, the cumulative population increase of approximately 144,805 persons and approximately 33,883

employees plus the Proposed Project's population and employee generation (1,662 persons and 43 employees) would equate, based on past crimes-per-resident rates, to an increase of approximately 23,812 crimes, compared to the 8,161 crimes in the Central Area in 2014.

Any new or expanded police station within the Central Area would be funded via existing mechanisms (e.g., property and sales tax revenue) to which both the Project and the cumulative projects would contribute and would be required to undergo City environmental review to identify any potential adverse environmental impact associated with its construction and/or operation and to identify mitigation for any significant impacts. Each of the cumulative projects would be individually subject to LAPD review, and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands.

In addition, the cumulative projects would contribute to funding police protection services in the area by generating annual revenue from property taxes that would be deposited into the City's General Fund and could potentially be used to fund the construction of future police protection facilities and support hiring more officers. This would further ensure that the incremental effect of either the Project or Alternative 4 on police protection services would not be cumulatively considerable. Because it would not result in a substantial incremental contribution to the cumulative demand for police protection services, neither the Project nor Alternative 4 would have a cumulatively considerable impact on police protection services.

No mitigation measures are required, as no cumulatively significant impacts associated with police services have been identified.

Public Services – Public Schools

Under CEQA's Guidelines (Appendix G), a project may have a significant environmental impact related to schools if it will result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which would cause significant environmental impact, in order to maintain acceptable service ratios or performance objectives for the school district.

Under the City's CEQA Thresholds Guide, the determination of a project's impacts on schools must be made on a case-by-case basis considering the following factors: (a) the population increase resulting from the proposed project, based on the increase in residential units or square footage of non-residential floor area; (b) the demand for school services anticipated at the time of project buildout compared to the expected level of service available, considering (as applicable) scheduled improvements to Los Angeles Unified School District ("LAUSD") services (facilities, equipment and personnel) and the project's proportional contribution to the demand; (c) whether (and the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the schools; and (d) whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

Construction

Neither construction of Alternative 4 nor the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities in order to maintain acceptable service ratios or other performance objectives. Therefore, impacts would be less than significant.

The Project Site is not in close proximity to any schools. The nearest school is the Korpus School of Art and Gallery, located approximately 700 feet to the southwest and separated from the Project Site by intervening development. The presence of these buildings would ensure that Project construction does not affect the school. The Project Site is accessed via a heavily used transportation corridor (4th Street and Santa Fe Avenue) and is located near the Hollywood Freeway (US 101), which would be used by haul trucks and for other regional access needs during Project construction. Although the potential exists for periodic sidewalk closures resulting from Project construction activities, no such closures are expected to occur near any schools. No haul trucks would pass any nearby schools. Therefore, impacts to schools during Project construction would be less than significant. Because Alternative 4 would be constructed on the same Site, its impacts would be less than significant for the same reasons.

No mitigation measures are required, as no significant impacts associated with school facilities from the Project's construction have been identified.

Operation

Operation of neither Alternative 4 nor the Proposed Project would result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities in order to maintain acceptable service ratios or other performance objectives.

Both Alternative 4 and the Project would increase the number of residents and employees resulting from the Project and the potential need to enroll school-aged children residing at the Project into LAUSD schools would increase the demand for school services. The LAUSD provides five-year projections on the total number of students living in the school's attendance area and who would be eligible to attend the school. There are no projections provided beyond that timeframe. With the addition of project-generated students to potential/eligible school enrollments, 9th Street Elementary would operate under capacity by 33 students, Hollenbeck Middle would operate under capacity by 153 students, and the Boyle Heights Zone of Choice schools (Roosevelt High, Mendez High, and Boyle Heights STEM) would operate under capacity by 2,079 students. With the addition of Project-generated students to potential school enrollments, none of the schools serving the Project would be over projected student capacity. In addition, pursuant to the California Government Code, mandatory payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Mandatory compliance with the provisions of SB 50 regarding payment of school fees is deemed to provide full and complete mitigation of school facilities impacts and no mitigation is required. Therefore, Project impacts to school services would be less than significant.

Neither Alternative 4 nor the Project would conflict with, or impede implementation of, any of the policies or goals related to schools described in the Framework Element of the General Plan or Central City North Community Plan, which describe the planning of facilities. The Project, through the payment of fees, would help the LAUSD achieve progress toward its goal to ensure adequate school facilities for existing and future population.

Alternative 4 would have reduced impacts on schools in that it would also have to pay SB 50 fees and would generate less students given the fewer number of live/work units. Therefore, Alternative 4's impacts to schools would be less than significant.

No mitigation measures are required, as no significant impacts associated with school facilities operation have been identified.

Cumulative Impacts

Neither Alternative 4 nor the Proposed Project, in conjunction with the Related Projects, would contribute to significant cumulative impacts associated with schools.

LAUSD's facility planning assumptions are based on overall demographic trends, and although not specifically based upon new development projects, are intended to address changes in student enrollment arising from area population trends from various sources, including new development. Implementation of the Project in conjunction with the cumulative development projects would generate students based on an increase in dwelling units and non-residential uses (employees' students). It is estimated that the cumulative projects would generate approximately 144,805 residents and 52,276 housing units. It is estimated that the cumulative projects would generate approximately 33,883 employees. All of the cumulative development projects would be served by the LAUSD and a portion of them would be located within the same school service zones as the Project, and thus would be impacting the same schools as the Project. This increase in the residential population of the area is estimated to generate a total of approximately 36,593 students (20,910 elementary, 5,228 middle, and 10,455 high school students). Depending on their location, the cumulative projects would be served by a variety of LAUSD schools located in the area. In addition, the students could be enrolled in private schools or one of the LAUSD charter or magnet schools located in the area. All other future projects would be required to pay a school fee to the LAUSD to help reduce cumulative impacts that they may have on school services. Compliance with the provisions of SB 50 is deemed to provide full and complete mitigation of school facilities impacts. Therefore, with the full payment of all applicable school fees, the Project coupled with expected cumulative growth would reduce potential projected cumulative impacts to schools. As neither Alternative 4 nor the Project would result in a substantial incremental contribution to the cumulative demand for school services.

No mitigation measures are required, as no significant cumulative impacts associated with school facilities have been identified.

Public Services – Parks

Under CEQA's Guidelines (Appendix G), a project may have a significant environmental impact if it were to: (a) result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks; (b) 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; and (c) include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Under the City's CEQA Thresholds Guide, the determination of significance for a Project's impacts on parks and recreation shall be made on a case-by-case basis, considering the following factors: (a) the net population increase resulting from the project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available, considering (as applicable) scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for recreation and park services (e.g., on-site recreation, facilities, land dedication or direct financial support to the Department of Recreation and Parks).

Operation

The Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks and recreational facilities. Therefore, impacts would be less than significant. Alternative 4 would have similar less than significant impacts.

A project's impacts with respect to parks and recreational facilities are determined based on the ability of existing parks and recreational facilities in the project area to accommodate the project's need for such facilities. The Project would generate approximately 1,662 residents and a net increase of approximately 43 employees (after removal of the existing uses). Employees generated by the office/retail/commercial uses of the Project would not typically enjoy long periods of time during the workday to visit parks and/or recreational facilities, and would therefore not contribute to the future demand on park services. In addition, the Project would include an amenity area in the center of the site (at the podium level), which would provide passive lounge area uses for employees to enjoy on breaks or before or after work.

Under the City's Public Recreation Plan ("PRP") within the City's General Plan, the City's standard ratio of neighborhood and community parks to population is four acres per 1,000 persons and the City's standard ratio of regional parks to population is six acres per 1,000 persons. Based on those ratios, the Project would generate a demand of approximately 6.65 acres of new neighborhood and community parkland and 9.97 acres of regional parkland. However, the Project includes a pool and spa, as well as barbecue and lounging areas, on the podium level, and rooftop lounge and deck with a pool. In addition, recreational rooms and workout/gym facilities would be provided for the use of the live/work unit occupants on various floors of the Project. The proposed landscaped pedestrian paseos would provide additional open space on the north and south sides of the Project. The Draft EIR noted that the applicant was in negotiations to purchase a strip of land, which would contribute to the public paseo. The applicant has since obtained title to that property, ensuring the public paseo as designed would be included as part of the Project and Alternative 4. These amenities would serve to reduce the Project's demand for and use of existing recreation and park facilities in the local area. The Project would provide at least the code-required open space, in the form of various common open space areas, landscaping, and private open space (unit balconies) as permitted by LAMC Article 2, 12.21(G). That provision of open space amenities would serve to reduce the Project's demands and use upon existing recreation and park facilities in the local area.

The Project would not conflict with, or impede implementation of, any of the policies or goals related to parks described in the Framework Element of the General Plan or Central City North Community Plan, which describe the planning of facilities. The Project, through the payment of the required Quimby fees and/or Parkland fees, would help the LADRP achieve progress toward its goal of ensuring adequate park facilities for existing and future residential populations within the Central City North community.

Because the Proposed Project was deemed fully vested by the City prior to the effective date of the 2016 Park Fee ordinance, the Project is not subject to the requirements of this ordinance. However, the Project is required to comply with the sections of the LAMC pertaining to the payment of Quimby and Parkland fees that were in place prior to the effective date of the new Park Fee ordinance. If a final map is recorded or there is a zone change (the Project is seeking a zone/height district change), then the Project is subject to Quimby Fees and/or Finn Fees. However, if a final map is not recorded and apartments are pursued (to a certificate of occupancy), the Project would instead be subject to the Dwelling Unit Construction Tax (DUCT) and applicable Finn Fees. The Project's compliance with the above-referenced Code requirements collectively address the Project's future demand upon recreation and park facilities by contribution of funds to be placed in a City-controlled account to be used to acquire and develop new parkland areas within the Project's service area. Project features (public space, pedestrian paseos, and open space) would also reduce the Project's impact to a less than

significant level. Since Alternative 4 would construct similar recreational amenities and pay the same fees, its impacts to parks would be less than significant.

No mitigation measures are required, as no significant impacts associated with parks and recreational facilities have been identified.

Cumulative Impacts

Neither Alternative 4 nor the Proposed Project would result in significant cumulative impacts associated with the provision of new or physically altered parks and recreational facilities. Therefore, impacts would be less than significant.

The extent to which the residential Related Projects include parks or recreational amenities s unknown. However, each residential project in the City will be required to comply with the City's Quimby Ordinance and/or Dwelling Unit Construction Tax payment. Compliance with these ordinances would mitigate potential park and recreational facility impacts associated with the construction of these projects. Additionally, the City can use General Fund revenues from these projects to help meet its target parkland planning ratios in order to meet the needs of existing and future development.

Under CEQA Guidelines section 15130(a)(3), a project's contribution to cumulative impacts is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure designed to alleviate the cumulative impact. Since the Project would be required to mitigate its impacts upon public recreation and park facilities by paying mandatory Quimby/Park fees and/or Recreation and Park Fees in addition to providing the mandatory code-required open space areas and on-site recreational amenities, the Project's impacts would not be considered cumulatively considerable. Those fees are mandatory and proportionate based on the Project's residential density.

No mitigation measures are required, as no significant cumulative impacts associated with parks and recreational facilities have been identified.

Public Services – Libraries

Under CEQA's Guidelines, a project may have a significant environmental impact if the project would: (a) 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 library services.

Under the L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following factors: (a) the net population increase resulting from the project; (b) the demand for library services anticipated at the time of project buildout compared to the expected level of service available, considering (as applicable) scheduled improvements to library services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct support to the Los Angeles Public Library).

Operation

Neither Alternative 4 nor the Proposed Project would result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities in order to

maintain acceptable service ratios or other performance objectives. Therefore, impacts would be less than significant.

The Project would generate approximately 1,662 residents and approximately 43 employees (net after removal of the existing uses). Employees generated by the office/retail/commercial uses of the Project would not typically enjoy long periods of time during the workday to visit libraries during work hours, as they are more likely to use libraries near their homes during non-work hours, and so are not included for purposes of determining a service impact to libraries.

The Project is served by three nearby LAPL library branches as well as the LAPL's Central Library, with a combined 574,656 square feet of floor area. The library service population areas overlap so there is no discrete population analysis for library service. However, the LAPL has confirmed that there is no need for any planned improvements, either under its Strategic Plan or otherwise, to add capacity through expansion to any identified branch or build any new libraries in the Project area. The City's CEQA Thresholds Guide considers features (on-site library facilities, direct support to LAPL) that would reduce the demand for library services. It is likely that the residents of the Project would have individual access to internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations. Further, Measure L has provided funds to restore adequate services to the existing library system. For all of these reasons, it is not anticipated that the Project or Alternative 4 would result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services. Consequently, impacts to library service would be less than significant.

Neither Alternative 4 nor the Project would conflict with, or impede implementation of, any of the policies or goals related to libraries described in the Los Angeles General Plan Framework, Los Angeles Public Library Strategic Plan 2015–2020, and Central City North Community Plan. The Project, through the generation of revenue into the City's General Fund, would help the LAPL achieve Objective 9.21, which seeks to ensure library service for current and future residents and businesses; achieve progress toward Goal 1, which seeks to improve communities by updating the Library Facilities Master Plan, planning new libraries, and increasing service hours, among other activities; and achieve progress toward its goal to ensure adequate library facilities and service, including new libraries or expansion of existing libraries.

Although the Project would increase the demand for library services through its resident population, it would not result in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. The Project population is estimated to be 1,662 persons, and the LAPL has confirmed that there are no planned improvements to add capacity through expansion to any identified branch or build any new libraries in the area. Thus, impacts to library services as a result of the Project would be less than significant. Alternative 4's impacts would be substantially similar and would be less than significant. Since Alternative 4 would develop fewer live/work units and therefore generate less demand on library services, its impact is also less than significant.

No mitigation measures are required, as no significant impacts associated with library facilities have been identified.

Cumulative Impacts

Neither Alternative 4 nor the Project, in conjunction with the Related Projects, would result in a significant cumulative impact associated with library facilities.

Implementation of the Project in conjunction with the Related Projects would generate approximately 144,805 residents and 52,276 housing units. Employees generated by the cumulative projects would not typically enjoy long periods of time during the workday to visit library facilities, and would, therefore, not contribute to the future demand on library services, and so are not included for purposes of determining a service impact to libraries. Depending on their location, the cumulative development projects would also be served by the same libraries as the Project, although some would be served by additional branches.

The increase in demand for library facilities as a result of these additional residents would be spread among the many libraries that are within a two-mile radius of each individual project. The LAPL has indicated that no improvements are either planned or have been identified as necessary to add capacity through expansion to any branch or to build any new libraries in the Project vicinity. Also, Measure L has provided funding to restore adequate services to the existing library system. Furthermore, the cumulative projects, through the generation of revenue into the City's General Fund, would help the LAPL achieve progress toward its goal to ensure adequate library facilities and service, including new libraries or expansion of existing libraries. As such, cumulative impacts would be less than significant.

Since Alternative 4 would develop fewer live/work units and therefore generate less demand for library services, it would not cause a significant cumulative impact on such services.

No mitigation measures are required, as no significant cumulative impacts associated with library facilities have been identified.

Transportation and Traffic

Under CEQA's Guidelines (Appendix G), a project would have a significant impact on traffic or transportation if it would cause any of the following conditions to occur: (a) conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit; (b) conflict with an applicable congestion management program, including but not limited to level of service 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; or (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.

Under the City's L.A. CEQA Thresholds Guide, a project would have significant impacts on traffic or transportation if it would cause any of the following conditions to occur: (a) would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections); (b) would the project exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways. The City's CEQA Thresholds Guide requires the transportation analysis to address the following areas of study: (1) intersection capacity; (2) street segment capacity; (3) freeway capacity; (4) neighborhood intrusion impacts; (5) project access; (6) transit system capacity; (7) parking; and (8) in-street construction impacts.

The Project's traffic analysis study area is generally bounded by 1st Street to the north, Soto Street to the east, Olympic Boulevard to the south, and Central Avenue to the west. A traffic analysis study area generally comprises those intersections with the greatest potential to experience significant traffic impacts due to the project, as defined by the City of Los Angeles. The Project's study area was established in consultation with LADOT, based on the above criteria, as well as peak hour Project trip generation, the anticipated distribution of Project traffic, and the existing intersections/corridor operations. It contains those 21 intersections with a reasonable potential to experience significant traffic impacts due to the Project. The same study area was used to evaluate the traffic impacts of the project alternatives, including Alternative 4.

New traffic counts for 17 of the 20 study intersections were conducted in the 2013-2015 time frame which is within the two-year window that LADOT considers acceptable. New intersection turning movement counts were collected at 17 of the 20 study intersections in 2013, 2014, and 2015. Based on discussions with LADOT staff, however, the collection of new traffic counts beyond the 2013-15 data already collected was not recommended, as new traffic counts would not reflect typical traffic patterns within the Study Area, since recent demolition of the 6th Street Viaduct and the resulting closure of 6th Street between Mateo Street and US-101 has shifted traffic to detour routes, specifically 4th Street and 7th Street. Based on discussions with LADOT staff, the collection of new traffic counts was not recommended, as new traffic counts would not reflect typical traffic patterns within the study area. Therefore, historical traffic count data from 2008 to 2015 were utilized, and an ambient growth rate of 1 percent per year was applied to the traffic counts to reflect regional growth and development between the year of the traffic count and 2016. The traffic counts conducted as part of this analysis (17 locations) or collected from City files (3 locations) were increased by a growth rate of between 1% and 8% to reflect 2016 conditions, and the calculated 2016 conditions were again expanded by 4% more to reflect year 2020 conditions. Although the turning movement counts were conducted during different days and months of the year, a review of the data and existing conditions indicated that the traffic volumes were consistent. Thus, for the purposes of this analysis, the Existing Conditions traffic volumes represent conditions as of the issuance of the Project's MOU. Local schools were in session when the traffic counts were conducted.

The Traffic Study also evaluated the Project's potential traffic impacts by considering the following traffic conditions, consistent with the LADOT's Traffic Study Policies and Procedures:

- Existing Conditions (Year 2016) – the analysis of existing traffic conditions provides a basis for the assessment of future traffic conditions.

- Existing with Project Conditions (Year 2016) – this analysis evaluates the potential Project-related traffic impacts as compared to Existing Conditions.

- Future without Project Conditions (Year 2020) – This analysis condition projects the potential intersection operating conditions that could be expected as a result of regional growth and related project traffic in the Study Area by the year 2020.

- Future with Project Conditions (Year 2020) – This analysis condition projects the potential intersection operating conditions that could be expected if the Project were occupied in the projected buildout year.

Intersection Impacts to Existing Conditions With the Project

The Proposed Project's traffic impacts would not exceed the significance threshold at the intersections studied in the Study Area. The Project's impacts will be less than significant levels. Similarly, Alternative 4 would result in less than significant impacts.

All 21 study intersections are expected to continue to operate at LOS D or better during both the morning and afternoon peak hours under Existing with Project Conditions. Additionally, all of the projected increases in intersection volume/capacity (V/C) ratios caused by Project-generated traffic would be less than the threshold for a significant impact to occur. Therefore, the Project would not cause any significant traffic impacts in either the morning or afternoon peak hour when compared to existing conditions. Likewise, Alternative 4's impacts would be less than significant since, among other factors, Alternative 4 would generate 538 fewer total daily trips than the Proposed Project.

No mitigation is needed because the impacts will be less than significant.

Congestion Management Program

The Proposed Project would not conflict with an applicable congestion management program ("CMP"). The impact would be less than significant. Alternative 4 would have similar impacts and would be less than significant.

The Los Angeles County Congestion Management Program requires that a traffic impact analysis be performed for all CMP arterial monitoring intersections where a project would add 50 or more trips during either the weekday morning or afternoon peak hours. A significant impact requiring mitigation occurs if project traffic causes an incremental increase in intersection volume to capacity ("V/C") ratio of 0.02 or greater to a facility projected to operate at level of service ("LOS") F after the addition of project traffic. The CMP identifies the following one arterial monitoring intersections within approximately two miles of the Study Area: (i) Alameda Street & Washington Boulevard (1.5 miles southwest of the Project Site). Both Alternative 4 and the Project would add fewer than 50 peak hour trips at the arterial monitoring intersection nearest the Project study area. Therefore, the Project's and Alternative 4's CMP arterial intersection impacts are considered to be less than significant and no further analysis is required.

The CMP also requires that a traffic impact analysis be performed for all CMP mainline freeway monitoring locations where a project would add 150 or more trips (in either direction) during the weekday morning or afternoon peak hours. The CMP identifies the following one mainline freeway monitoring locations within the vicinity of the Project Site: (i) US 101 North of North Vignes Street. The Project and Alternative each would add fewer than 150 peak hour trips in each direction during both the morning and afternoon peak hours at the mainline freeway monitoring location nearest the Project study area. Therefore, the Project's and Alternative 4's CMP mainline freeway impacts are considered to be less than significant and no further analysis is required.

The CMP also requires that a transit system analysis be performed to determine whether a project would increase transit ridership beyond the current capacity of the transit system. The Project morning and afternoon peak hour person trips by transit are projected at 28 and 37 trips, respectively, or less than 3.7 percent of the total residual capacity of the bus lines within the study area during the morning and afternoon peak. Alternative 4's morning and afternoon peak hour person trips by transit are projected at 28 and 33 trips, respectively, or less than 3.7 percent of the total residual capacity of the bus lines within the study area during the morning and afternoon peak. Although the maximum ridership may currently exceed capacity along a specific local route (e.g., Metro Local 62) during both the morning and afternoon peak hours, overall the total transit capacity of the numerous bus lines can accommodate the Project's transit trips, with and without the promotion of transit usage with implementation of the Project's mitigation measures. Therefore, the Project's and Alternative 4's respective impact to the regional transit system is anticipated to be less than significant. Furthermore, although the Project and Alternative 4 (and other cumulative development projects) each would cumulatively

add transit ridership, it is assumed that public transit providers would add additional service when required in order to accommodate cumulative demand in the region. Therefore, the Project's and Alternative 4's respective contribution to cumulative impacts on public transit would be less than significant.

No mitigation measures are required, as no significant impacts associated with a congestion management plan have been identified.

Utilities and Service Systems – Wastewater

Under CEQA's Guidelines, a project would have a potentially significant wastewater impact if it were to result in one or more of the following: (a) exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board; (b) require or result in the construction of new wastewater treatment facility or expansion of existing facilities, the construction of which would 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 would cause significant environmental effects; or (d) 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.

Under the L.A. CEQA Thresholds Guide, a determination of significance with respect to wastewater should consider the following: (a) whether the project would cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; and (b) whether the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its amendments.

Wastewater Generation and Infrastructure

Neither Alternative 4 nor the Project would require or result in the construction of new water or wastewater treatment facilities, the construction of which would cause significant environmental impacts. City regulations and incorporation of Project Design Feature PDF-M.1-3 would ensure the Project's impacts associated with wastewater infrastructure remain less than significant.

It is estimated that operation of the Project would generate a net total of approximately 102,933 gallons per day (gpd) (or 0.103 mgd) of wastewater. This total was reduced by the amount of wastewater that is currently being generated by the existing uses on the Project Site, which would be removed.

The Project Site is currently developed and adequately served by the existing wastewater conveyance system. As part of the building permit process, the City will confirm and ensure that there is sufficient capacity in the local and trunk lines to accommodate the Project's wastewater flows. Further detailed gauging and evaluation would be needed as part of the permit process to identify the specific sewer connection point. If the public sewer is found to have insufficient capacity, then the Project Applicant would be required to build new sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit would be made at that time. During the construction phase of the Project, an application for a sewer connection permit and Sewer Capacity Availability Review (SCAR) must be submitted to the City. The Project Applicant would also pay any required sewer connection fees.

The potential construction of larger capacity sewer lines, or sewer connections, would not result in significant impacts as the construction would be of short duration and would occur with the implementation of best practices, such as the use of a flagman during work within the public

right of way, to avoid significantly impacting traffic or emergency access. This is included as Project Design Feature WW-PDF-1.

The Project's 0.103 mgd net increase in wastewater generation over the existing Project Site uses would represent approximately 0.12 percent of the existing remaining capacity at the Hyperion Treatment Plant (HTP). Therefore, the HTP has enough remaining capacity to accommodate the Project.

The wastewater generated by the Project would be similar to that of other existing residential, office, and retail uses in the area. No industrial discharge into the wastewater or drainage system would occur. As HTP complies with the state's wastewater treatment requirements and the Project's wastewater generation is well within the plant's existing capacity, the Project would not exceed the wastewater treatment requirements of LAWQCB. Therefore, no significant impacts with regard to wastewater treatment requirements or treatment plant outflow quality would occur.

Further, the City's implementation of the Sewer Allocation Ordinance assures that sufficient capacity is available at the HTP at the time a building permit is issued by the City for a project. The 0.103 mgd increase in wastewater generation of the Project also represents approximately 2.1 percent of the annual sewage allotment of 5.0 mgd. The Project's additional wastewater flows would not substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or the General Plan and its amendments. Project impacts upon wastewater treatment capacity would therefore be less than significant.

Since Alternative 4 would generate 13,371 gpd less wastewater than the Project, Alternative 4's wastewater impacts would also be less than significant.

No mitigation measures are required, as no significant impacts associated with new water or wastewater treatment facilities have been identified.

Stormwater

The Project would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. The impact would be less than significant. Alternative 4 would also not require new stormwater facilities and its impacts would be less than significant.

Neither Alternative 4 nor the Project would create or contribute to runoff water that would result in the need for any additional storm water drainage facilities. In 2011, the City amended the City's Stormwater Ordinance (LAMC 64.70) and expanded on the City's existing Standard Urban Stormwater Mitigation Plan ("SUSMP") to implement Low Impact Development ("LID"), a storm water management strategy that seeks to prevent impacts of runoff and storm water pollution as close to its source as possible. Since the Project will add more than 500 feet of square feet of impervious area, it must comply with the LID Ordinance, including the LID's Best management Practices as determined on a case by case basis by public works. If the LID's Best Management Practices are not feasible, the City's SUSMP Best Management Practices would apply. The Project would also be required to obtain a National Pollution Discharge Elimination System ("NDPES") water quality permit from the LARWQCB. Further, implementation of appropriate project design features and compliance with local, State, and federal regulations, code requirements, and permit provisions would prevent significant impacts related to the release of potentially polluted discharge into surface water. Construction activities would also be subject to the City's inspection and implementation of storm water Best management Practices. The Project and Alternative 4 would also comply with the California Building Standards

Commission requirements for irrigation systems. Based on its compliance with all those requirements, neither Alternative 4 nor the Project would result in construction of new storm water drainage facilities or expansion of existing facilities. Therefore, impacts would be less than significant.

No mitigation measures are required, as no significant impacts associated with new storm drainage facilities or expansion of existing facilities have been identified.

Cumulative Impacts

Neither Alternative 4 nor the Project, in conjunction with the Related Projects, would contribute to a significant cumulatively considerable impact associated with wastewater or stormwater. Therefore, impacts would be less than significant.

Implementation of either Alternative 4 or the Project in conjunction with the Related Projects would increase demand for wastewater services provided by the City's sewer system. The Related Projects within the City are served by the same sewer system as the Project Site, and thus are counted as part of the cumulative analysis.

The cumulative development projects in combination with the Project would generate approximately 9,707,043 gpd (9.71 mgd) of wastewater, with the Project accounting for approximately 1.1 percent of that projected increase in wastewater generation. As with the Project, the cumulative projects would rely on the wastewater treatment services provided by the HTP, as all of the projects are within the service boundaries of the HTP. However, existing wastewater-generating uses at each of the cumulative project sites have not been factored into this analysis. The existing remaining capacity of the HTP is approximately 88 million gpd. The cumulative sewage generation of the Project and the cumulative projects within the surrounding area would be well within the design capacity of the HTP, representing about 11 percent of the remaining capacity. As such, the Project's incremental effect on cumulative impacts to wastewater treatment capacity would not be cumulatively considerable. Since Alternative 4 would generate less wastewater than the Project, Alternative 4 would have similar impacts, which would also be less than significant.

No mitigation measures are required, as no significant cumulative impacts associated with wastewater or storm water drainage have been identified.

Utilities and Service Systems – Water Supplies

Under CEQA's Guidelines (Appendix G), a project would have a significant impact on water if: (a) the project would require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; or (b) there were insufficient water supplies available to serve the Project from existing entitlements and resources, and new or expanded facilities were needed.

Under the L.A. CEQA Thresholds Guide, the determination of impact significance on water must be made on a case-by-case basis, considering the following factors: (a) the total estimated water demand for the project (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing, or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

Water Demand, Supplies, and Infrastructure

Sufficient water supplies are available to serve the Project or Alternative 4 from existing entitlements and resources. Incorporation of Project Design Feature WAT-PDF-1 would ensure that either Alternative 4 or the Project's impacts associated with water infrastructure remain less than significant. Therefore, impacts would be less than significant.

Certain construction activities for the Project would consume water, such as soil watering (i.e. for fugitive dust control), clean up, masonry, painting, and other related activities. Typically, fugitive dust watering is provided by private purveyors and not provided by on-site water sources. Reclaimed water can also be used for dust control. Since the Project's construction would occur in various stages, construction activities would occur intermittently and would be short-term and temporary in nature. Further, the activities requiring water would not create substantial water demand. Overall, construction activities would require minimal water consumption and would not be expected to have adverse impacts on available water supplies or existing water distribution systems.

As part of the building permit process, the City would confirm that there is sufficient capacity in the water supply and infrastructure to accommodate the Project's water needs. If there is a deficiency that would prevent the Project from receiving an adequate level of service, the Project Applicant will fund the required upgrades to adequately serve the Project. To reduce that potential impact, Project Design Features WAT-PDF-1 would facilitate the flow of traffic and reduce those impacts to a less than significant level. Impacts would be less than significant.

Water consumption for the Project was estimated by LADWP in its Water Supply Assessment for the Proposed Project. The Project is estimated to consume a net total of approximately 128,666 gallons per day (gpd) (or 0.129 mgd). This total was reduced by the demand of the existing uses, which would be removed.

The Los Angeles Aqueduct Filtration Plant (LAAFP) currently has the capacity to treat and convey an additional 125 mgd of water. The Project's net increase of 0.129 mgd represents approximately 0.1 percent of the LAAFP available capacity, and would be accommodated within the LAAFP's existing treatment capacity. The Project's water demand is accounted for in the City's future projected demands. Therefore, the current treatment plant capacity of LAAFP is estimated to be adequate to accommodate future demands. The Project would not require the construction or expansion of new water treatment facilities that could cause a significant environmental effect.

Additionally, given the incremental increase in water consumption for the Project, and compliance with applicable water conservation ordinance and regulations such as California Code of Regulations (CCR), Title 20, Section 1604; CCR Title 22; City Ordinances 165,004 and 166,080; the Project would not require or result in the construction of new water treatment facilities. The 2015 LADWP Urban Water Management Plan takes into account drought conditions. After adjusting for economy and drought conditions, projected water demands can vary by approximately ± 5 percent in any given year due to average historical weather variability. This means that water demands under cool/wet weather conditions could be as much as 5 percent lower than normal demands on average; while water demands under hot/dry weather conditions could be as much as 5 percent higher than normal demands on average. Therefore, the Project's anticipated operational water demand would be considered to have a less than significant impact.

The Los Angeles Department of Water and Power (LADWP) Board of Commissioners approved a Water Supply Assessment for the Project. The WSA anticipated that the maximum 144.14 AF per year of total additional annual water demanded from the Project would fall within the UWMP's projected water supplies for normal, single-dry and multiple-dry years through the year 2040 and falls within the UWMP's 25-year water demand growth projection. Therefore, the

Project is consistent with the 2015 UWMP, and a less than significant impact would occur with respect to City water supplies.

The Project Applicant has committed to include a number of water conserving features in the design of the Project in addition to those required under applicable City ordinances. These features are included as Project Design Feature WAT-PDF-2. In addition, the Project would be required to comply with the City of Los Angeles Low Impact Development Ordinance (City Ordinance No. 181,899) and to implement Best Management Practices that have stormwater recharge or reuse benefits for the Project (as applicable).

Since Alternative 4 would generate 17,182 gpd less water demand than the Proposed Project, Alternative 4's impact to water supplies and infrastructure would also be less than significant.

No mitigation measures are required, as no significant impacts associated with impacts to water demand, supply, or infrastructure have been identified.

Project Design Feature

WAT-PDF-1 – In the event of full or partial public street closures, such as during the construction of new water lines, the Construction Traffic Management Plan shall be implemented.

WAT-PDF-2 – The Project design shall include, at a minimum, the water conserving features identified in Table II (on page 9) of the Water Supply Assessment prepared by LADWP for the Project.

Alternative 4 would incorporate these Project Design Features.

Fireflow

The Project would not have significant impacts to the water conveyance system for fireflows. The impact would be less than significant. Alternative 4 would also have less than significant impacts.

The Project design includes design features to increase the capacity of existing water infrastructure in accordance with LADWP standards, which take into account LAFD fire flow and pressure requirements. Furthermore, the Water Operations Division of the LADWP would perform a detailed fire flow study at the time of permit review in order to ascertain whether further water system or site-specific improvements would be necessary. Hydrants, water lines, and water tanks would be installed per Fire Code requirements for the Project. In addition, the Project Applicant would be required to submit the proposed plot plans for the Project to the LAFD for review for compliance with applicable Los Angeles Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, thereby ensuring that the Project would not create any undue fire hazard. For the same reasons, since Alternative 4 would include the same design features and comply with the same regulations, Alternative 4 would also not result in any significant impacts.

No mitigation measures are required, as no significant impacts associated with the water conveyance system for water flows have been identified.

Cumulative Impacts

Neither Alternative 4 nor the Project, in conjunction with the Related Projects, would contribute to a significant cumulatively considerable impact associated with water supplies. Therefore, impacts would be less than significant.

Implementation of either Alternative 4 or the Project in conjunction with the Related Projects would increase demand for water services provided by the City's water supply system. The Related Projects within the City are served by the same system as the Project Site (LADWP), and thus are counted as part of the cumulative analysis. For a conservative analysis, the City analyzed all of the Related Projects. Based on a cumulative estimated water demand, the Related Projects in the City in combination with the Project would demand approximately 11,653,400 gpd (11.7 mgd) of water, with the Project accounting for approximately 1.1 percent of that projected increase in water demand.

Through its UWMP, the LADWP anticipates its projected water supplies will meet demand through the year 2040, including anticipated growth projections and demographic changes. In terms of the City's overall water supply condition, the water requirement for any Related Project that is consistent with the City's' General Plan has been accounted for in the planned growth of the City's water system. Additionally, any Related Project that conforms to the demographic projections from SCAG's Regional Transportation Plan ("RTP") and is located in the service area is considered to have been included in LADWP's water supply planning efforts. Therefore, projected water supplies would meet projected demands. Similar to the Project, each Related Project would also be required to comply with City and state water code and conservation programs for both water supply and infrastructure. All Related Projects would also comply with the Governor's Executive Order on drought conditions. Further, each of the Related Projects is required to be consistent with the SCAG RTP projections in order to be accounted for the City's 2010 Urban Water Management Plan's current and projected available water demands. As the Related Projects must be consistent with and accounted for in those projections, no significant cumulative water supply impact is anticipated from development of the Project and the Related Projects, and the LAAFP would have adequate capacity to treat the cumulative water demand from the Project and Related Projects.

In addition, the potential need for the Related Projects to upgrade water lines to accommodate their water needs is site-specific and there is little, if any, relationship between development of the Project and the Related Projects in relation to this issue. Therefore, no cumulative water infrastructure impacts or water treatment facilities impacts are anticipated for the development of the Project and the Related Projects. Also, Citywide water conservation efforts would be expected to partially offset the cumulative demand for water. For example, LADWP undertakes expansion or modification of water services infrastructure to serve future growth in the City as required in the normal process of providing water service. For all of those reasons, the Project would not contribute to a cumulatively considerable effect on water service and supply. Therefore, the cumulative impacts of the Related Projects in combination with the Project would be less than significant. Since Alternative 4 would generate less water demand than the Project, it also would not cause a significant cumulative impact.

No mitigation measures are required, as no significant cumulative impacts associated with water service and supply have been identified.

Utilities and Service Systems – Solid Waste

Under CEQA's Guidelines (Appendix G), a project could have a significant environmental impact if the project would result in the following: (a) be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs; or (b) an impact related to compliance with federal, state, and local statutes and regulations related to solid waste.

Under the City's CEQA Thresholds Guide, a determination of significance relative to solid waste and infrastructure shall be made on a case-by-case basis, considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could

reduce typical waste generation rates; (b) need for an additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objects in the City's Source Reduction and Recycling Element ("SRRE") or its updates, the City Solid Waste Management Policy Plan ("CiSWMPP"), Framework Element or Curbside Recycling Program, including consideration of the land-use specific waste diversion goals contained in Volume 4 of the SRRE.

Construction

The Project would be served by landfills with sufficient permitted capacity to accommodate the solid waste disposal needs from the Project's construction. The impact would be less than significant. Alternative 4 would also have less than significant impacts.

During the 30 month construction period, Project demolition and construction activities would generate an average of approximately 9.17 tons per day of construction waste. The Project's demolition and construction debris would primarily be classified as inert waste and would be recycled in accordance with the California Green Building Standards Code, which requires 50 percent of C&D debris be recycled, as well as the LAMC Section 66.32 which requires 70 percent of solid waste (including C&D debris) generated in the City to be recycled.

Assuming a 70 percent diversion/recycling rate, the development of the Project would result in the generation of 2,476 tons of construction waste, with an average of 2.75 tons per day over the Project buildout. The remaining waste would be disposed of in a Class III landfill or a mixed debris recycling facility. The projected total amount of daily Project construction waste (after diversion) would equate to 0.008 percent of the combined existing daily intake of the available landfills.

Thus, as existing landfills and waste facilities have sufficient capacity to handle the Project's amount of construction waste, construction related solid waste impacts would be less than significant. Since Alternative 4 would generate the same amount of solid waste during construction, its impacts would also be less than significant.

No mitigation measures are required, as no significant impacts associated with solid waste from construction have been identified.

Operation

The Project would be served by landfills with sufficient permitted capacity to accommodate the solid waste disposal needs from the Project's operations. Therefore, this impact would be less than significant. Alternative 4 would also be served by landfills with sufficient permitted capacity and would have less than significant impacts.

The Project is estimated to generate a net total of approximately 7,184 pounds per day of solid waste. This total is a conservative, worst-case scenario and does not account for the effectiveness of the recycling efforts that the Project would implement. The Project would be required to provide adequate space for disposing of recyclable materials. While landfills have a finite amount of space, proposals for expansions of existing landfills, the opening of new facilities, and the development of new waste disposal technologies would facilitate solid waste disposal facilities and other waste management options to continue to be available to the Project. Thus, solid waste generated during operation of the Project would result in a less than significant impact.

The City is served by the Sunshine Canyon City/County Landfill and the Chiquita Canyon Landfill. The Sunshine Canyon Landfill currently accepts 9,000 tpd on weekdays and 3,000 tpd

on Saturday, but can accept 12,100 tpd. Therefore, the Sunshine Canyon City Landfill could accommodate the additional estimated 8.76 tons per day increase in solid waste resulting from the Project's operation.

Additionally, pursuant to AB 939, each city and county in the state must divert 50% of its solid waste from landfill disposal through source reduction, recycling, and composting. The City achieved a waste diversion rate of 76.40 percent in FY 2013 and is on track toward its goal to achieve a 90 percent diversion by 2025.

The Project would be served by landfills with sufficient permitted capacity to accommodate the Project's solid waste disposal needs and would not require an additional solid waste collection route or recycling or disposal facility. Operation of the Project would not require the need for additional solid waste facilities, the construction of which could cause significant environmental effects or substantially or incrementally exceed the future scheduled capacity of any landfill. Further the Project would comply with existing regulations for solid waste recycling and diversion. Operational solid waste impacts would be less than significant for the Project.

Since Alternative 4 would generate 1,129 fewer pounds solid waste than the Project, its solid waste impacts would also be less than significant.

Mitigation Measures. No mitigation measures are required, as no significant impacts associated with solid waste have been identified.

Cumulative Impacts

Neither Alternative 4 nor the Proposed Project, in conjunction with Related Projects, would contribute to a significant cumulatively considerable impact associated with solid waste.

Implementation of either Alternative 4 or the Project in conjunction with the Related Projects would increase solid waste generation. All of the Related Projects are served by the same landfills as the Project (Puente Hills MRF and Sunshine Canyon). The Related Projects in combination with the Project would generate approximately 309,178,000 pounds (or 154,589 tons) of construction solid waste, with the Project accounting for approximately 5.3 percent of that projected increase in construction solid waste generation. It is reasonable to assume that cumulative construction of the Related Projects could happen over two years (at a minimum, given the sizes of some of the larger projects). The total square footage of all the related projects was added together and multiplied by a solid waste generation factor. The total tons were then divided by a reasonable number of working days over a two-year period. Using that calculation, construction would generate approximately 322 tons per day of cumulative construction waste. The landfills would have adequate capacity to accept the cumulative project's construction waste. The cumulative construction debris generated by the Project combined with the Related Projects would constitute a small percentage of remaining inert landfill capacity. Therefore, cumulative impacts related to disposal of demolition and construction debris would not be cumulatively considerable.

With respect to operation, the Related Projects in combination with the Project would generate approximately 762,040 pounds (381.02 tons) of solid waste per day, with the Project accounting for approximately 0.94 percent of that projected amount. Similar to the Project, the Related Projects would participate in regional source reduction and recycling programs pursuant to AB 939, further reducing the amount of solid waste to be disposed of at the landfills serving the City. Related Projects would also be required to participate in recycling programs, thus reducing the amount of solid waste to be disposed of at the landfills servicing the City. To provide a conservative estimate, the City assumed that all solid waste generated by the Related Projects

would be delivered to the Sunshine Canyon Landfill, which can accommodate the additional daily increase in solid waste resulting from the cumulative projects.

The County has also supported State legislation that encourages the development of waste conversion technologies (i.e. AB 1939 in 2000 and AB 2770 in 2002). The ongoing process of improving solid waste facilities and advancing disposal techniques and strategies would further minimize the already less than significant impact on cumulative solid waste generation and disposal. The Related Projects would also act to implement the applicable City and County Waste diversion goals and policies, including the City's Solid Waste Management Policy Plan, the Source Reduction Recycling Element, the Framework Element, the Solid Resources Infrastructure Strategy Facilities Plan, the City's Municipal Code, and the County's Integrated Waste Management Plan, and Source Reduction Recycling Element.

For all of those reasons, cumulative impacts associated with solid waste will be less than significant for the Project. Since Alternative 4 would generate less solid waste, its cumulative impacts would also be less than significant.

No mitigation measures are required, as no significant cumulative impacts associated with solid waste have been identified.

Utilities and Service Systems – Energy Conservation

Under CEQA's Guidelines (Appendix F), an EIR should include the following: (a) the project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed; (b) the effects of the project on local and regional energy supplies and on requirements for additional capacity; (c) the effects of the project on peak and base period demands for electricity and other forms of energy; (d) the degree to which the project complies with existing energy standards; (e) the effects of the project on energy resources; and (f) the project's protected transportation energy use requirements and its overall use of efficient transportation alternatives.

Under the City's CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following: (a) the extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities; (b) whether and when the needed infrastructure was anticipated by adopted plans; and (c) the degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements. Based on those factors, a project would have a significant impact if: (i) the project would result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capacities; or (ii) the design of the project fails to incorporate energy conservation measures that go beyond existing requirements.

Construction

The Project's construction would not require new energy supply facilities; would not lead to wasteful, inefficient, or unnecessary consumption of energy; would comply with all applicable energy conservation measures; and would incorporate energy conservation measures. Impacts related to energy conservation and energy resources from the Project's construction would be less than significant, as would the impacts from Alternative 4.

The Project's demolition, site clearing, grading, excavation, and trenching would last for approximately five months. Heavy-duty construction equipment associated with these activities would include diesel fuel haul trucks, excavators, skid steer loaders, tractors, and water trucks. It is estimated that up to 376 haul truck trips per day would be required to haul the material to

off-site reuse and disposal facilities. The Project would require the use of haul trucks with double trailers to increase the overall average capacity per trip, which would minimize the total number of trips and fuel required to transport the debris. Heavy-duty construction equipment associated with building construction would include air compressors, concrete pumps, forklifts, lifts, and welders. Heavy-duty construction equipment associated with outdoor hardscape and landscaping would include air compressors, backhoes, dozers, forklifts, lifts, loaders, and rollers. The majority of the equipment will likely be diesel-fuels; however, smaller equipment such as air compressors and lifts may be electric-, gas-, or natural-gas fuels. Construction equipment fuels (diesel, gas, or natural gas) would be provided by local regional suppliers and vendors. The transportation fuel required by construction workers would depend on the total number of worker trips estimated for the duration of construction activity. Assuming construction worker vehicles have an average fuel economy consistent with a Caltrans study, based on the maximum projected number of workers during each phase, the Project would use approximately 50,031 gallons of gasoline and 97,378 gallons of diesel, assuming heavy-duty construction equipment (such as haul route trucks) is primarily diesel-fueled. This would represent 0.00035 percent of the statewide gasoline consumption and 0.0037 percent of the statewide diesel consumption. The expected construction gasoline and diesel fuel gas for the Project would be negligible compared with statewide supplies and would be accommodated by local or regional suppliers and vendors. Therefore, gas impacts during construction would be less than significant.

The Project would have short-term construction impacts, as construction activities would consume relatively minor quantities of electricity, including temporary use of lighting and small power tools. These tools and lighting would be powered with charging stations supplied by portable generators. There would be no use of any permanent infrastructure for the delivery of electricity until after construction of the buildings. The electrical demand generated by these tools and lighting is substantially less than the Project's operational demand. Electricity for the Project's construction, when needed, would be supplied by the local utility provider (LADWP) via existing on-site connections. This would be consistent with suggested measures in the City's CEQA Thresholds Guide to reduce air pollution by using electricity from power poles rather than from temporary diesel or gasoline powered generators. Electricity used to provide temporary power for lighting and electronic equipment (e.g., computers, etc.) inside temporary construction trailers and for lighting when necessary for general construction and renovation activity would generally not result in a net increase in on-site electricity use over existing conditions since the Project Site is occupied. Therefore, electricity impacts during construction would be less than significant.

Further, the Project would use construction contractors who demonstrate compliance with applicable California Air Resources Board ("CARB") regulations governing the accelerated retrofitting, reporting, or replacement of heavy-duty diesel on- and off-road equipment. Compliance with CARB's anti-idling and emission regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy.

Since the construction of Alternative 4 would be carried out in a similar fashion to the Project, its energy impact during construction would also be less than significant.
No mitigation measures are required, as no significant impacts associated with energy conservation have been identified from the Project's construction.

Operation

The Project's operation would not require new energy supply facilities; would not lead to wasteful, inefficient, or unnecessary consumption of energy; would comply with all applicable energy conservation measures; and would incorporate energy conservation measures. Impacts

related to energy conservation and energy resources from the Project's operation would be less than significant, as would impacts from Alternative 4.

For the Project's electricity demands, electrical conduits, wiring, and associated infrastructure would be conveyed to the Project from existing LADWP lines in the surrounding streets to the Project during construction. The Project would likely require transformer vaults, which are common for buildings of its size. However, construction of those vaults is part of the overall building construction and would not constitute unusual or unplanned infrastructure that would cause a significant impact on the environment. The Project would demand approximately 5,539,170 kWh per year. The Project's annual electricity consumption would represent approximately 0.009 percent of the forecasted electricity demand in 2020-2021. Thus, the Project is within the anticipated demand of the LADWP system. Further, the Project's estimated electricity consumption is based on usage rates that do not account for the Project's energy conservation features or updates to the Los Angeles Building Code. This represents a conservative, worst-case scenario approach, as the actual electricity consumption from the Project would likely be lower than forecasted. LADWP's current and planned electricity supplies would be sufficient to support the Project's electricity consumption. The Project would be in compliance with Title 24 of the California Code of Regulations (Calgreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code. Electrical service would be provided in accordance with LADWP's Rules Governing Water and Electric Service. Based on the above analysis, no operational impacts associated with the consumption of electricity would occur.

The Project is estimated to demand approximately 10,576,050 cubic feet/year of natural gas. The total was reduced by the demand of existing uses, which would be removed. The Project's natural gas demand would represent approximately 0.005 percent of Southern California Gas Company's peak demand in 2020. As such, there is adequate supply capacity and no impacts. Further, the Project would be responsible for paying connection costs to connect its on-site service meters to existing infrastructure. The Project would not result in the construction of natural gas facilities (i.e., natural gas distribution lines) that would cause significant environmental impacts. Project design features for building efficiency would also help alleviate natural gas demand. Therefore, the Project would not lead to impacts on natural gas infrastructure and Project impacts related to natural gas would be less than significant.

The Project would also not lead to wasteful, inefficient, or unnecessary consumption of transportation energy. The Project's location takes advantage of existing transportation alternatives in the vicinity that could reduce energy (gasoline, electric, or natural gas, depending on the mode of travel). The Metro Red Line Little Tokyo/Arts District Station is 0.7 mile from the Project Site. Additionally, a number of Metro and LADOT bus routes are within reasonable walking distance (less than one-quarter mile) of the Project Site. As such, the Project Site is located in proximity to numerous Metro bus routes, thereby providing access for employees, patrons, and residents. These services provide an alternative to driving individual vehicles both into the Project Site from the surrounding areas as well as for residents, guests, and visitors at the Project Site to travel to surrounding areas. Project-related vehicles would require a negligible fraction of the state's total transportation fuel consumption. With compliance with regulatory measures, the Project's operations would not result in wasteful, inefficient, or unnecessary consumption of transportation energy.

The Project's potential to use energy provided by alternative resources to meet the Project's operational demands is constrained by the energy portfolio mix managed by the Los Angeles Department of Water and Power ("LADWP", the Project's service provider) and by limitations on the availability or feasibility of on-site energy generation. LADWP has committed to meetings the requirements under the California Renewable Energy Resources Act by procuring at least 33 percent of its renewable energy portfolio from renewable sources by 2020 from by the

procurement of energy from eligible renewable resources to the extent permitted by fiscal constraints, renewable energy pricing, system integration limits, and transmission constraints. LADWP's existing renewable energy resources included small hydro, wind, solar, and biogas, which accounted for 20 percent of its overall energy mix. This represents the available off-site renewable sources of energy that would meet the Project's demand. With respect to on-site renewable energy sources, due to the Project's location, there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydro, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Geothermal energy requires the installation of a heat exchanger consisting of a network of below-ground pipes to convey heated or cooled air into a building. Methane can be a renewable derived biogas, but it is not available on the Project Site in commercially viable quantities or form, and its extraction and treatment for energy purposes would result in secondary impacts. Methane is also currently regulated as a hazardous material by the City. Solar and wind power could be used to augment, but not replace, natural gas-fired energy power generation. However, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. The Project Site was not identified in a study by the California Energy Commission as an area with wind resource potential. Also, there are no viable sites within the Project Site for placement and operation of a wind turbine. With respect to solar energy, the California Energy Commission determined Los Angeles County has a relatively high photovoltaic potential. However, most of the high potential areas in Los Angeles County are located in the northeastern corner of the County, approximately 65 miles from the Project Site. Additionally, the California Energy Commission determined inland counties are more suitable for large-scale solar power generation.

Since Alternative 4 would incorporate the same project design features as the Project, use less electricity than the Project, and comply with all codes and regulations, Alternative 4's impacts would be less than significant.

No mitigation measures are required, as no significant impacts associated with energy conservation have been identified from the Project's operation. However, Project Design Feature EN-PDF-1 shall be required so the Project's impacts associated with energy conservation remain less than significant.

Project Design Feature

EN-PDF-1 – The Project shall use Energy Star appliances where available.

Alternative 4 shall comply with this Project Design Feature.

Cumulative Impacts

Neither Alternative 4 nor the Project, in conjunction with Related Projects, would contribute to a significant cumulatively considerable impact associated with energy conservation.

The Project in conjunction with the Related Projects would increase demand for electricity. CalEEMod model runs are not available for each related project, thus, a more macro approach to cumulative projected impacts is discussed. Overall, LADWP estimates that electricity demand in 2021-22 to be roughly 5,718 MW of electricity. The Project would account for roughly 0.09 percent of the forecasted demand in the City. Although future development would result in the use of renewable and non-renewable energy during Project construction and operation, the use of such resources would be generally consistent with the growth expectations for the LADWP service area. Each Related Project would also be required to comply with Title 24 of the California Code of Regulations ("CalGreen") requiring building energy efficiency standards and

would be in compliance with the City's Green Building Code. Further, each project would need to be consistent with how the LADWP serves each location with its existing distribution infrastructure. Thus, the cumulative projects are within the anticipated demand of the LADWP system and, accordingly, there is adequate energy capacity to service the Project and the cumulative projects. Therefore, cumulative impacts would be less than significant.

Implementation of the Proposed Project in conjunction with the Related Projects would also increase demand for natural gas. It should be noted that CalEEMod model runs are not available for each related project. As mentioned above, the SCG retail core peak day demand in 2020 (the expected year of Project completion) is forecasted at 2,899 million cf/day. The Project's 0.27 million cf/day represents approximately 0.005 percent of the expected 2020 peak demand. These forecasts consider projected population growth and development based on local and regional plans. Although future development projects would result in the irreversible use of natural gas resources which could limit future availability, the use of such resources would be consistent with regional and local growth expectations for SoCalGas's service area.

Also, forecasted growth would incorporate design features and energy conservation measures, as required by Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code, which would reduce the impact on natural gas demand. It is also anticipated that future developments would upgrade distribution facilities, commensurate with their demand, in accordance with all established policies and procedures. There would be sufficient statewide supplies to accommodate the statewide requirements from 2020-2035. Therefore, cumulative impacts would be less than significant.

For these same reasons and because its electricity usage would be less than the Project, Alternative 4 would also result in less than significant cumulative impacts.

No mitigation measures are required, as no significant cumulative impacts associated with energy conservation have been identified.

2.0 LESS THAN SIGNIFICANT IMPACTS WITH MITIGATION

The EIR determined that the Project has potentially significant environmental impacts in the areas discussed below. The EIR identified feasible mitigation measures to avoid or substantially reduce the environmental impacts in these areas to a level of less than significant. Based on the information and analysis set forth in the EIR, the Project would not have any significant environmental impacts in these areas, as long as all identified feasible mitigation measures are incorporated into the Project. The City again ratifies, adopts, and incorporates the full analysis, explanation, findings, responses to comments, and conclusions of the EIR.

Air Quality

Description of Effects

Construction Phase Impacts – Local Impacts

At a local level, construction of the Project and Alternative 4 could produce emissions that potentially impact air quality near the Project Site. To assess the air quality impact of localized construction emissions of PM2.5, PM10, CO, and NO2, the SCAQMD's recommended LST methodologies were used. Neither Alternative 4 nor the Project would produce significant emissions that exceed the SCAQMD's recommended localized standards of significance for the criteria pollutants, with the exception of PM10 and PM2.5, the impacts of which can be reduced to less than significant levels through regulatory compliance and implementation of mitigation.

Cumulative Impacts

Both Alternative 4 and the Proposed Project would produce construction emissions that contribute to cumulative emissions in the local vicinity during the construction period. Other projects that are scheduled for construction during that time could also contribute to cumulative impacts. There are 11 potential construction projects within one-third mile of the Project Site that could produce construction impacts that, in combination with the Proposed Project or Alternative 4, could contribute to cumulative air quality impacts. However, even if construction activities at these 11 sites were to occur simultaneously with the development of the Proposed Project or Alternative 4, cumulative local air quality impacts are expected to be less than significance because the thresholds are designed to ensure that a development project does not contribute to localized exceedances of CO, NOx, PM10, or PM2.5 concentrations.

With respect to operation, the Project and Alternative 4 could contribute to two types of cumulative impacts on local air quality. First, the Project and Alternative 4 would generate minimal on-site emissions of localized pollutants (PM2.5, PM10, and NOx) from area and energy sources that are typical of residential and commercial development in the area. However, the cumulative development of other projects in the area would produce similar area and energy source emissions that would not result in localized exceedances of ambient air quality standards. Second, the long-term operation of the Project or Alternative 4 with the 183 other cumulative projects could contribute to cumulative, localized air quality impacts that are considered to be less than significant.

The Project and Alternative 4 would also be consistent with assumption in the SCAQMD's 2016 Air Quality Management Plan, and would be consistent the City's General Plan Air Quality Element. Impacts would be less than significant.

Mitigation Measure

AIR-MM-1 – During site preparation activities, limit simultaneous operation of off-road equipment to no more than five pieces of equipment.

The Mitigation Measure also applies to Alternative 4.

Finding

With respect to the potential impacts regarding air quality construction-phase local impacts and cumulative impacts associated with the Project and Alternative 4, each decision-making body of the City adopts the first possible finding as outline above in Section III, which states that "changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (CEQA Guidelines Section 15091(a)(1)).

Rationale for Finding

With respect to the construction phase, compliance with existing SCAQMD regulations would substantially reduce localized emissions of particulates from fugitive dust sources, including for the nearby Molino residential lofts and other developments on local streets. These are required by SCAQMD Rule 403, which calls for the application of best available control measures to all construction activities. Compliance with Rule 403 would reduce PM2.5 and PM10 emissions associated with construction activities by approximately 61 percent. In addition, Mitigation Measure AIR-MM-1 would mitigate localized emissions of PM2.5 and PM10. The air quality analysis throughout the Draft EIR was conducted consistent with applicable SCAQMD guidance and CalEEMod, including the CalEEMod User's Guide. Through regulatory compliance and implementation of Mitigation Measure AIR-MM-1, both Alternative 4's and the Project's localized emissions of PM2.5 and PM10 during the construction phase would be reduced below the

SCAQMD's applicable thresholds. Therefore, impacts would be reduced to a less than significant level.

With respect to the cumulative construction scenario, even if nearby projects were to be constructed simultaneously with the Project or Alternative 4, impacts would be less than significant for at least four reasons. First, each construction site would be required to meet SCAQMD's applicable LST thresholds at nearby sensitive receptors, which are designed to ensure that a development project does not contribute to localized exceedances of CO, NOx, PM10, or PM2.5 concentrations. Second, CO hotspots are not expected from cumulative growth in the Project area as described in Section 4.C, Air Quality, of the Draft EIR. Third, neither Alternative 4 nor the Project would exceed the LST thresholds set by the SCAQMD for PM emissions. Fourth, future development that contributes to cumulative growth would be required to address LST thresholds and perform dispersion modeling if potential violations of health standards were to occur. For these reasons, neither Alternative 4's nor the Project's contribution to cumulative construction air quality impacts would be significant.

With respect to long-term cumulative operational impacts, neither the Project nor Alternative 4 in conjunction with nearby development projects would cause significant impacts, since they would generate only minimal on-site emissions of localized pollutants, and since they would not cause exceedances of CO air quality standards at roadways in the area, as described in Section 4.C, Air Quality, of the Draft EIR.

With respect to cumulative regional air emissions, since both the Project and Alternative 4 would create emissions beneath applicable SCAQMD regional emissions thresholds, they are not considered to have a significant cumulative contribution to regional air quality impacts. Thus, cumulative regional impacts are also less than significant.

Further, in the South Coast Air Basin, per SCAQMD guidance, cumulative impacts on regional ozone air quality are judged by a project's consistency with the SCAQMD's 2016 Air Quality Management Plan (AQMP). The proposed live/work, office, and commercial land uses will neither conflict with the SCAQMD's 2016 Air Quality Management Plan (AQMP) nor jeopardize the region's attainment of air quality standards. The regional ozone attainment plan centers on accommodating population growth forecasts by the Southern California Association of Governments (SCAG). Specifically, SCAG's growth forecasts from the 2016 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are largely built off local growth forecasts from local governments like the City of Los Angeles. The RTP/SCS accommodates up to 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs in the City of Los Angeles by 2040. The population associated with either the Project or Alternative 4 would be less than 1 percent of projected population growth and less than 1 percent of household growth in the City of Los Angeles through 2040. As such, the Project and Alternative 4 would not conflict with the growth assumptions for the City in the AQMP. This impact is considered less than significant.

Finally, with respect to the City's Air Quality Element (which relies on SCAQMD guidance and requirements in this area to determine the significance of development on air quality), based on the above analysis, through compliance with SCAQMD regulations and with implementation of Mitigation Measure AIR-MM-1, the Proposed Project and Alternative 4 would be consistent with the City's General Plan Air Quality Element and would not contribute to a cumulatively significant impact on air quality.

With implementation of Mitigation Measure AIR-MM-1 and through compliance with applicable regulations, the Project's and Alternative 4's air quality impacts would be less than significant.

Reference

For a complete discussion of the Project's impacts associated with air quality, see Section 4.C, Air Quality, of the Draft EIR. For a complete discussion of Alternative 4's impacts, see Section 6, Alternatives, of the Draft EIR. See also Section II, Responses to Comments, of the Final EIR.

Geology and Soils

Description of Effects

Expansive Soils

The on-site geologic materials examined from the test borings are in the very low to low expansion range. Such soils are not subject to measures to mitigate expansive soils. However, given that test borings in portions of the site were not able to be drilled due to the presence of the existing building, additional expansion tests must be performed when the excavation work is nearing completion in order to determine the expansion potential of the soils exposed near the final grade. Thus, the Project's and Alternative 4's impacts with respect to expansive soils are potentially significant. With implementation of Mitigation Measure GEO-MM-1, impacts would be reduced to less than significant.

Mitigation Measure

GEO-MM-1 – The Project shall comply with the recommendations found on pages 6 through 23 of the Report of Geotechnical Investigation, R.T. Frankian & Associates, September 25, 2014 (included as Appendix H to the Draft EIR), to the satisfaction of the Bureau of Engineering.

The Mitigation Measure also applies to Alternative 4.

Finding

With respect to the Project's and Alternative 4's potential impacts regarding expansive soils, each decision-making body of the City adopts the first possible finding as outlined above in Section III, which states that "changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (CEQA Guidelines Section 15091(a)(1)).

Rationale for Finding

Both Alternative 4 and the Project have potential for significant impacts with respect to expansive soils. However, with incorporation of Mitigation Measures GEO-MM-1, impacts would be less than significant. Mitigation Measure GEO-MM-1 would ensure that the Project and Alternative 4 are feasible from a geotechnical engineering standpoint with respect to soil expansion and stability. With implementation of Mitigation Measure GEO-MM-1, potential impacts of the Project and Alternative 4 relating to expansive soils would be reduced to a less than significant level.

Reference

For a complete discussion of the Project's impacts associated with expansive soils, see Section 4.D, Geology and Soils, of the Draft EIR. For a complete discussion of Alternative 4's impacts, see Section 6, Alternatives, of the Draft EIR.

Hazards and Hazardous Materials

Description of Effects

Soil Contamination

A Phase I Environmental Site Assessment and limited Phase II assessment were conducted for the Project site (see Appendices I-1 and I-2 of the Draft EIR). The results of those assessments are described in Section 4.F, Hazards and Hazardous Materials, of the Draft EIR. As described therein, and in Section 2, Responses to Comments, of the Final EIR, soil contaminant levels are below applicable state and federal limits across the majority of the Project site, with only one sample taken showing elevated levels of lead and arsenic above applicable regulatory limits. Based upon the available data, the soil contaminants on-site appear to be limited to a specific area of the property and do not appear to constitute a threat for off-site migration. However, the presence of that contamination at that area represents a potentially significant impact if not

remedied. With incorporation of Mitigation Measures HAZ-MM-1, impacts would be less than significant for the Project and Alternative 4.

Mitigation Measure

HAZ-MM-1 – Following demolition of the existing structures and removal of the debris from the Project Site, a full Phase II Environmental Site Assessment of the Project Site shall be performed. If soil and/or groundwater contamination is encountered, a detailed Soil Management Plan for the segregation of contaminated soils and materials shall be developed and implemented in accordance with applicable laws and regulations. The Soil Management Plan shall be submitted to the Department of Building and Safety Grading Division for approval prior to the issuance of a grading permit.

Alternative 4 will comply with this Mitigation Measure.

Finding

With respect to the Project's and Alternative 4's potential impacts regarding soil contamination, each decision-making body of the City adopts the first possible finding as outlined above in Section III, which states that "changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (CEQA Guidelines Section 15091(a)(1)).

Rationale for Finding

Erring on the conservative side a Phase II assessment will be required following demolition of the existing structure in order to fully characterize soil quality and the extent of soil contamination. In order to ensure that potential impacts associated with excavation and grading are reduced to a less than significant level, Mitigation Measure HAZ-MM-1 requires a complete Phase II ESA to be performed to fully characterize the soils beneath the site following the demolition of the existing structure on-site and prior to the commencement of soil removal activities, and the implementation of all soil remediation and/or disposal recommendations contained within the complete Phase II report. As part of this required mitigation, if soil containing contaminants above regulatory levels are found to exist, a detailed Soil Management Plan must be developed for review and approval by the City. This Plan will specify procedures for segregating contaminated materials and removing the contaminated materials from the site to proper disposal or remediation facilities in accordance with applicable regulations, thus ensuring that offsite migration of contaminated materials does not occur. The Project site does not directly discharge to the Los Angeles River (or any other water body) and potential soil contamination impacts on water bodies are less than significant for that reason as well.

Mitigation Measure HAZ-MM-1 is being required as a cautionary step to ensure that the soil is remediated prior to construction of the Proposed Project. Any remediation work would be governed by established law and regulation, which provide the pertinent standards and thresholds to ensure that implementation of Mitigation Measure HAZ-MM-1 will reduce impacts below significance. To ensure compliance, the City has conditioned the grading permit on compliance with this mitigation. Thus, with implementation of Mitigation Measure HAZ-MM-1, all impacts related to soil contamination from the Project would be less than significant. Since Alternative 4 proposes to develop the same site, with incorporation of Mitigation Measure HAZ-MM-1, impacts would also be less than significant.

Reference

For a complete discussion of the Project's impacts associated with soil contamination, see Section 4.F, Hazards and Hazardous Materials, of the Draft EIR, and Appendices I-1 and I-2 attached thereto. For a complete discussion of Alternative 4's impacts, see Section 6, Alternatives, of the Draft EIR. See also Section 2, Responses to Comments, of the Final EIR.

Noise

Description of Effects

Construction Noise

Construction activity would result in temporary increases in ambient noise levels in the Project area on an intermittent basis. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers. Construction activities for either Alternative 4 or the Proposed Project would occur between the hours of 7:00 AM and 9:00 PM in accordance with the City of Los Angeles Municipal Code. Construction noise levels could exceed 75 dBA at two of the four monitored sites, with ambient noise level increases of 5 dBA for more than 10 days in a 3-month period, as well as an increase of 10 dBA at some of the sensitive receptors. The greatest impact would occur at the 544 Mateo Street location. Therefore, construction noise impacts would be considered significant prior to the implementation of mitigation. However, Mitigation Measures NOI-MM-1 through NOI-MM-9 would reduce the Project's and Alternative 4's construction noise impact to a less than significant level.

Cumulative Impacts

Both the Proposed Project and Alternative 4 would produce construction-related noise that contributes to cumulative noise in the local vicinity during the construction period. Other projects that are scheduled for construction during that time could also contribute to cumulative impacts. There are three cumulative development projects located within 500 feet of the Project Site:

555 S. Mateo Street (At Mateo). Development with 153,000 square feet of retail space and 50,000 square feet of office approximately 50 feet southwest of the Project Site.

540 S. Santa Fe Avenue. Office development consisting of 65,812 square feet approximately 200 feet southeast of the Project Site.

500 S. Mateo Street. Restaurant containing 12,882 square feet approximately 50 feet north of the Project Site.

Concurrent construction of the three cumulative projects and the Proposed Project, if unmitigated, could potentially create a significant cumulative impact at the sensitive receptors located at 544 Mateo Street and the Barker Block Lofts. However, Mitigation Measures NOI-MM-1 through NOI-MM-9 would reduce the Project's and Alternative 4's construction noise impact to a less than significant level. Implementation of Mitigation Measures NOI-MM-1 through NOI-MM-7 would also reduce the Project's and Alternative 4's respective contribution to any potential cumulative construction impacts. With the incorporation of these measures, cumulative construction noise impacts for the Project and Alternative 4 would be less than significant.

Mitigation Measures

Mitigation Measures NOI-MM-1 through NOI-MM-9 would reduce the Project's and Alternative 4's construction noise impact to a less than significant level. Implementation of Mitigation

Measures NOI-MM-1 through NOI-MM-7 would also reduce the Project's and Alternative 4's respective contribution to any potential cumulative construction impacts.

NOI-MM-1 – The construction staging area shall be located as far from sensitive receptors, particularly the Molino Lofts and Barker Block residences, as possible.

NOI-MM-2 – Temporary sound barriers, capable of achieving a sound attenuation of at least 10 dBA (e.g., construction sound wall or sound blankets), and capable of blocking the line-of-sight between the adjacent sensitive receptors, shall be installed. If the At Mateo project, 540 S. Santa Fe project, and/or the 500 S. Mateo project performs mass grading at its site at the same time as the Proposed Project, temporary sound barriers shall achieve attenuation of at least 15 dBA at the Project Site.

NOI-MM-3 – Power construction equipment (including combustion engines), fixed or mobile, shall be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards), including solar and electric options. All equipment shall be properly maintained to assure that no additional noise due to worn or improperly maintained parts would be generated.

NOI-MM-4 – Two weeks prior to the commencement of construction, notification shall be provided to the immediate surrounding off-site residential and noise-sensitive commercial uses that discloses the construction schedule, including the types of activities and equipment that would be occurring/operating throughout the duration of the construction period.

NOI-MM-5 – Equipment warm-up areas, water tanks, and equipment storage areas shall be located a minimum of 50 feet from abutting sensitive receptors.

NOI-MM-6 – Construction haul trucks shall avoid accessing residential streets. Haul trucks shall enter and exit the Project Site via Santa Fe Avenue.

NOI-MM-7 – Construction workers shall park at designated locations and shall be prohibited from parking on nearby residential streets.

NOI-MM-8 – A noise disturbance coordinator shall be established to respond to local complaints about *construction* noise. The disturbance coordinator shall determine the cause of the noise complaints and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs, legible at a distance of 50 feet, at the construction site shall list the telephone number for the disturbance coordinator.

NOI-MM-9 – All residential units located within 2,000 feet of the construction site shall be sent a notice informing the residences of the construction schedule of the Proposed Project. A sign shall also be posted at the construction site notifying residences of construction activities. All notices and signs shall display the dates of construction activities, as well as provide a telephone number where residents can contact the noise disturbance coordinator about the construction process and register complaints.

Alternative 4 would be required to comply with these same Mitigation Measures.

Finding

With respect to the Project's and Alternative 4's potential impacts regarding noise, each decision-making body of the City adopts the first possible finding as outline above in Section III, which states that "changes or alterations have been required in, or incorporated into, the project

which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (CEQA Guidelines Section 15091(a)(1)).

Rationale for Finding

Both the Project's and Alternative 4's construction-related activities, although temporary, would potentially expose sensitive receptors or the surrounding area to noise levels in excess of the City's CEQA thresholds of significance. With incorporation of Mitigation Measures NOI-MM-1 through NOI-MM-9, impacts would be less than significant. Mitigation Measure NOI-MM-2, for example, would install sound walls capable of reducing temporary construction noise levels at off-site receptors by at least 10 dBA. Mitigation Measure NOI-MM-3 would ensure that powered construction equipment are properly outfitted with exhaust mufflers and other noise-reduction devices. Other mitigation measures would further reduce the Project's construction noise impact. Since the Proposed Project or Alternative 4 could lead to impacts associated with noise in excess of applicable standards, the Mitigation Measure NOI-MM-1 through NOI-MM-9 shall be required to reduce those associated impacts to a less than significant level.

With respect to cumulative impacts, construction of the Proposed Project and Alternative 4 would significantly elevate noise levels at the Molino Lofts and the 544 Mateo Street media facility during the grading portion of the construction process. These impacts would be greatest where they front the Proposed Project site. Concurrent construction of the three cumulative projects nearby the Project Site, if it were to occur, would also impact noise levels at the Molino Lofts, though impacts would be greatest on different frontages for these receptors, given the locations of the three other projects. As such, both Alternative 4 and the Project would need to implement source-reduction measures, such as Mitigation Measures NOI-MM-1 through NOI-MM-7 that call for the use of noise mufflers on off-road equipment and the erection of temporary sound barriers. Even so, the immediate proximity of the potential construction sites to the Molino Lofts and the 544 Mateo Street site would still produce cumulative noise increases exceeding 5 dBA at both receptor locations, even after mitigation, if construction of the three projects were to proceed simultaneously. If the At Mateo project and/or 500 S. Mateo Street project were to conduct grading and earthmoving work at the same time as the Proposed Project, an additional 5 dBA of reduction from temporary sound barriers would be needed to ensure there are no significant noise increases at local sensitive receptors. Mitigation Measure NOI-MM-2, requiring the installation of temporary sound barriers capable of achieving a sound attenuation of at least 10 dBA (and at least 15 dBA in the event that Project grading and earthmoving occurs at the same time as that of the At Mateo project) would ensure that local receptors are protected from significant noise increases in either construction scenario. With implementation of this mitigation, cumulative impacts would be reduced to a less than significant level for the Project and Alternative 4.

Construction activities beyond a distance of 500 feet are unlikely to create any incremental impacts on any of the receptors analyzed in this study for two reasons. First, the logarithmic relationship between distance and sound waves makes the potential for audible increases in ambient noise beyond 500 feet unlikely. Second, there are many intervening structures between the more distant cumulative projects and any sensitive receptors related to the Proposed Project and Alternative 4. Each structure would further block the sound path to any of the receptors and significantly attenuate noise. Because this noise would not be audible at any of the sensitive receptors, this cumulative impact is considered less than significant.

The majority of the Project's long-term noise impact would result from vehicular traffic traveling to and from the Project. Thus, the addition of future traffic from any new developments in the Project area, as well as overall ambient traffic growth, would elevate ambient noise levels surrounding local roadways. However, the Project's and Alternative 4's respective contribution to permanent cumulative off-site ambient noise level increases would be marginal, specifically,

less than 3 dBA (i.e., within their respective "normally unacceptable" or "clearly unacceptable" noise categories), or by 5 dBA or greater, with or without the addition of Project traffic. As a result, the Project's and Alternative 4's respective long-term and cumulative operational noise impacts would be considered less than significant.

The predominant vibration source near the Project Site is heavy trucks traveling on the local roadways. The Project and Alternative 4 could generate vibration from heavy haul trucks traveling on local roadways, though this impact would not be considered significant as the volume of such truck traffic would be minimal and on-road truck vibration is not typically perceptible. As also discussed earlier, three other development projects have been proposed for locations within 500 feet of the Project. Construction activities at the 555 S. Mateo Street project, the 540 S. Santa Fe Avenue project, and the 500 S. Mateo Street project would also be expected to generate haul trips on local roads. However, it is not expected that these haul trips, in addition to the Project's haul trips, would cause a substantial cumulative increase in haul truck trips and related vibrations for the following reasons. The 555 S. Mateo Street project is expected to have balanced cut and fill, and would therefore not require a considerable number of haul trips to export excavated or graded materials. The 540 S. Santa Fe Avenue has completed its major grading and demolition phases. Further building construction work would not require a substantial number of haul trips. Lastly, the 500 S. Mateo Street project proposes to renovate and reuse an existing office building, which would not require extensive demolition and grading activities that necessitate the mass export of debris and soils. The Proposed Project's and Alternative 4's respective contribution to cumulative vibration in the vicinity of the Project would thus be considered less than significant.

Mitigation Measures NOI-MM-1 through NOI-MM-9 would reduce the Project's and Alternative 4's construction noise impact to a less than significant level. Implementation of Mitigation Measures NOI-MM-1 through NOI-MM-7 would also reduce the Project's and Alternative 4's respective contribution to any potential cumulative construction impacts. With the incorporation of these measures, cumulative construction noise impacts would be less than significant.

Reference

For a complete discussion of the Project's impacts associated with noise, see Section 4.I, Noise, of the Draft EIR. For a complete discussion of Alternative 4's impacts, see Section 6, Alternatives, of the Draft EIR.

Public Services – Police Services

Description of Effects

Construction

Construction sites could be sources of attractive nuisances, providing hazards and inviting theft and vandalism that could result in an increase in demand for police protection services. The Project Site is generally open to access except on the south side, where it is shielded by existing adjacent buildings. Given the ease of potential illicit access during the construction period, the Site would need to be secured during construction in order to avoid a potentially significant impact. Although minor traffic delays due to temporary lane closures needed to facilitate specific construction activities could occur, particularly during the construction of utilities and street improvements, impacts to police response times are considered to be less than significant. With the Project Design Features and incorporation of the Mitigation Measures, impacts from the Project and Alternative 4 would be less than significant.

Operation

Both Alternative 4 and the Project would generate new residents, visitors, and employees, and would also increase the amount of developed square footage on the Project Site. The LAPD does not maintain minimum officer-to-resident population ratio objectives, however, the data can serve as a useful metric to gauge the effect of a proposed project on service levels and response times. The Project's additional 1,662 residents would require approximately 11 additional officers to maintain the current ratio. The demand for 11 additional officers to maintain current resident service ratios would not require the expansion, consolidation, or relocation of this station. Alternative 4 would generate fewer residents since fewer live/work units would be developed. Therefore, no expansion, consolidation, or relocation of this station would be necessary.

To address the potential additional crime in the Project area due to the population growth and the employee increase in daytime population, the Project and Alternative 4 would include security features within the parking facilities and along exterior building areas and the north and south paseo areas, such as appropriate lighting and gated access to the private areas of the Project. No additional mitigation measures are required, as no significant impacts associated with police services have been identified. However, compliance with Mitigation Measure POL-MM-3 and Project Design Feature POL-PDF-2 shall ensure that the Project's and Alternative 4's impacts to police services will remain less than significant.

Project Design Features

POL-PDF-1 – Emergency access shall be maintained to the Project Site during construction through marked emergency access points approved by the LAPD.

POL-PDF-2 – The Project shall provide for on-site security measures and controlled access systems for residents and tenants to minimize the demand for police protection services. These measures include, but are not limited to, the following:

- Perimeter lighting to supplement the street lighting and to provide increased visibility and security;
- On-site security personnel, commensurate to similar/comparable residential and retail projects of its size, as needed;
- Parking Garage Access Control; and
- Residential Units Access Control.

Mitigation Measures

POL-MM-1 – Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

The perimeter fence shall have gates installed to facilitate the ingress and egress of equipment and the work force. The bottom of the fence, when necessary, shall have filter fabric to prevent silt run off. Straw hay bales shall be utilized around catch basins when located within the construction zone. The perimeter and silt fence shall be maintained while in place. Where applicable, the construction fence shall be incorporated with a pedestrian walkway. Temporary lighting shall be installed and maintained at the pedestrian walkway. Should sections of the site fence have to be removed to facilitate work in process, barriers and or K-rail shall be utilized to isolate and protect the public from unsafe conditions.

POL-MM-2 – The Project Applicant shall provide for the deployment of a private security guard to monitor and patrol the Sites, appropriate to the phase of construction throughout the construction period. The patrol shall be deployed at times that are typical within the local-area construction industry for a Project of this size.

POL-MM-3 – The Project Applicant shall provide the LAPD with a diagram of each portion of the Project Site, showing access routes and additional access information as requested by the LAPD, to facilitate police response.

Alternative 4 would comply with these same mitigation measures and project design features.

Finding

With respect to the Project's and Alternative 4's potential impacts regarding the police services, each decision-making body of the City adopts the first possible finding as outline above in Section III, which states that "changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (CEQA Guidelines Section 15091(a)(1)).

Rationale for Finding

During the construction phase, both the Project and Alternative 4 could result in adverse physical impacts associated with the provision of new or physically altered police protection facilities in order to maintain acceptable service rations, response times, or other performance objectives. However, incorporation of mitigation Measures POL-MM-1 and POL-MM-2 would reduce those impacts to less than significant levels. The impact would be less than significant for the Project and Alternative 4.

Fencing and other security features, as necessary, would be provided at the Project Site during construction under Mitigation Measures POL-MM-1 and POL-MM-2. Security measures would ensure that valuable materials (e.g., building supplies and metals such as copper wiring), as well as construction equipment are not easily stolen or abused. This is especially important since the Project Site is located at the intersection of multiple streets which have an active walking and/or driving environment. While there is the potential for the construction to create an increase in demand for police protection services, the Project would provide security on the Project Site as needed and appropriate during the phases and course of the construction process. This security would include perimeter fencing, lighting, and security guards, thereby reducing the demand for LAPD services. These security features are listed as Mitigation Measures POL-MM-1 and POL-MM-2. The specific type and combination of construction site security features would depend on the phase of construction. Therefore, with implementation of these security features, construction impacts as they relate to increased on-site demand for police services during construction would be less than significant.

Construction of the Project or Alternative 4 would not be expected to affect the LAPD's ability to respond to emergencies to the extent that there would be a need for any additional new or expanded police facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the LAPD. Thus, construction-related impacts to police protection services would be less than significant with the implementation of Mitigation Measures POL-MM-1 and POL-MM-2. Alternative 4 would have similar impacts, which would also be less than significant with implementation of mitigation.

Since the Proposed Project's or Alternative 4's construction could impact on police protection services, the following mitigation measures POL-MM-1 and POL-MM-2 shall be required to reduce those impacts to a less than significant level. Project Design Feature POL-PDF-1 shall

also be required to ensure construction impacts related to police protection services remain less than significant.

The Proposed Project's operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities in order to maintain acceptable service rations, response times, or other performance objectives. Implementation of Project Design Feature POL-PDF-2 would ensure the Project's operational impacts related to police protection remain less than significant. Impacts would be less than significant. Alternative 4 would have similar impacts and would be less than significant with implementation of mitigation.

By providing natural surveillance (visibility from streets and sidewalks) and natural access control (landscaping buffers and other distinctions between public and private spaces), both Alternative 4 and the Project can be designed to reduce crime. Both Alternative 4 and the Project would have defensible spaces designed to reduce opportunity crimes and ensure safety and security. In addition, the lighting and landscaping design would ensure high visibility, and the Project would provide for on-site security measures and controlled access systems for residents and tenants to minimize the demand for police protection services. Both Alternative 4 and the Project would incorporate crime prevention features into the design of the buildings and public spaces, such as lighting of entryways and public areas. Through Project Design Feature POL-PDF-2, the Project and Alternative 4 would incorporate crime prevention features into the design. The Project Applicant would also provide the LAPD with a diagram of each portion of the Project Site, showing access routes and additional access information as requested by the LAPD to facilitate police response. Emergency access to the Project Site would be provided by the existing street system.

Neither Alternative 4 nor the Project would also conflict with, or impede implementation of, any of the policies or goals related to police protection described in the Framework Element of the City's General Plan or the Central City North Community Plan, which describe planning of facilities. Additionally, the Project would contribute to the City's General Fund through the generation of revenue, which would help LAPD achieve progress toward its goal to ensure adequate police facilities and protective services for existing and future population and land uses.

Overall, neither Alternative 4 nor the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for police protection. Due to the Project's direct population increase and associated demand for police protection services, as well as its construction phase, there would be a potential impact on police protection services. Therefore, to reduce the Project's potential impacts on police protection services to less than significant levels, a combination of project design features and mitigation measures described below and above would be required. Alternative 4's impacts would be substantially similar and less than significant with implantation of mitigation and project design features.

Reference

For a complete discussion of the Project's impacts associated with police services, see Section 4.K.2, Public Services – Police Protection, of the Draft EIR. For a complete discussion of Alternative 4's impacts, see Section 6, Alternatives, of the Draft EIR.

Transportation and Traffic

Description of Effects

Project Ramp Queue Impacts

An analysis of Caltrans facilities, including freeway mainline segments, Caltrans intersections, and off-ramp queuing was performed. The Project exceeds the screening thresholds identified in the Caltrans Agreement at the freeway off-ramps. Thus, further analyses of Caltrans facilities were conducted. Caltrans does not identify specific incremental criteria by which to measure the significance of impacts to freeway mainline segments or intersections with ramp termini and, therefore, it is not possible to identify whether a specific facility would be significantly impacted under Caltrans criteria. Mitigation Measure TR-MM-3, requiring the Project Applicant to contribute its fair share toward off-ramp improvements to increase the storage length on the three off-ramps where capacities are projected to be exceeded, would reduce the Project's ramp queuing impact to a less than significant level. With implementation of this same mitigation, Alternative 4's impacts would also be reduced to less than significant levels.

Construction

The City's CEQA Thresholds Guide identifies four types of in-street construction impacts, including: (1) temporary traffic impacts – potential impacts on vehicular travelers on roadways; (2) temporary loss of access – potential impacts on visitors entering and leaving sites; (3) temporary loss of bus stops or rerouting of bus lines – potential impacts on bus travelers; (4) temporary loss of on-street parking – potential impacts on parkers. Traffic impacts from construction activities could occur as a result of the following types of activities: (i) increases in truck traffic associated with export of fill materials and delivery of construction materials; (ii) increases in automobile traffic associated with construction workers traveling to and from the site; (iii) reductions in existing street capacity or on-street parking from temporary lane closures necessary for the construction of roadway improvements, utility relocation, and drainage facilities; and (iv) blocking existing vehicle or pedestrian access to other parcels fronting street.

Grading Component

The peak period of truck activity during construction would occur during excavation and grading of the Project Site. Based on projections compiled for both Alternative 4 and the Project, approximately 105,000 cubic yards (CY) of material would be excavated and removed from the Project Site over this 40-workday period. That equates to approximately 2,625 CY of material exported each workday, requiring 188 haul trucks per work day based on an anticipated haul truck capacity of 14 CY each. Thus, up to 376 daily truck trips (188 inbound, 188 outbound) are forecast to occur during the excavation and grading period, with approximately 48 trips per hour (24 inbound, 24 outbound) uniformly over a typical eight-hour workday.NOx

Construction Component

Construction activities are planned over a 21-month period and include a maximum of 200 employees per day. 200 workers would result in a total of 176 vehicles that would arrive and depart from the Project Site each day. The estimated number of daily trips associated with the construction workers is approximately 152 (176 inbound and 176 outbound trips), but nearly all of those trips would occur outside of the peak hours, as described above.

The use of the public right-of-way along Mateo Street and Santa Fe Avenue would require temporary rerouting of pedestrian traffic as the sidewalks fronting the Project Site would be closed. The Construction Management Plan would include measures to ensure pedestrian safety along the affected sidewalks and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering).

Since the construction of either Alternative 4 or the Project could temporarily cause potentially short-term significant impacts, a Construction Management Plan shall be required to ensure construction impacts related to traffic remain less than significant. With incorporation of the following Construction Management Plan for Alternative 4 or the Project, impacts will be less than significant.

Mitigation Measure

TR-MM-3 – The Applicant shall consult with Caltrans in order to determine and provide its fair share contribution toward the funding of off-ramp improvements necessary to increase the storage length on the three off-ramps where Project-generated traffic would contribute to forecast traffic volumes in excess of available ramp storage capacities.

Alternative 4 would comply with the Mitigation Measure.

Regulatory Measure

Construction Management Plan – A detailed Construction Management Plan, including street closure information, detour plans, haul routes, and staging plans would be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and should include the following elements as appropriate:

- Advance notification of adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction.

- Prohibition of construction worker parking on adjacent residential streets.

- Temporary pedestrian and vehicular traffic controls during all construction activities adjacent to Mateo Street and Santa Fe Avenue to ensure traffic safety on public right of ways. These controls shall include, but are not limited to, flag people trained in pedestrian and student safety.

- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flagmen).

- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.

- Construction-related vehicles shall not park on surrounding public streets.

- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate, including along all identified LAUSD pedestrian routes to nearby schools.

- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible, and so as to not impede school drop-off and pick-up activities and students using LAUSD's identified pedestrian routes to nearby schools.

- Coordination with public transit agencies to provide advanced notifications of stop relocations and durations.

- Advanced notification of temporary parking removals and duration of removals.

Alternative 4 would comply with this regulatory measure.

Finding

With respect to the Project's and Alternative 4's potential impacts regarding the construction and project ramp queue impacts, each decision-making body of the City adopts the first possible finding as outline above in Section III, which states that "changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (CEQA Guidelines Section 15091(a)(1)).

Rationale for Finding

Project traffic would add to a projected background condition in which the queue already would extend onto the mainline lanes. Yet, improvements to Caltrans freeway facilities tend to be beyond the feasibility of any individual project to implement; therefore, Appendix B of the Caltrans TIS Guide provides a methodology to identify a project's proportionate share of the future traffic growth on the Caltrans freeways facilities. The fair share is calculated as the Project's percentage of the total projected traffic growth on a freeway mainline segment up to 2035. The Project alone would not result in significant impacts at any of the analyzed freeway mainline segments, but would contribute to the cumulative future traffic volumes. As calculated in the Draft EIR, the average of the Project's and Alternative 4's respective proportionate share of the growth on the 40 segments tested is less than 1 percent. Since the Project could contribute to cumulative off-ramp queue impacts, the Project applicant would be required to contribute its fair share of improvements to increase storage length, as set forth in Mitigation Measure TR-MM-3. Thus, as described in 4.L, Transportation – Traffic, of the Draft EIR, Caltrans has identified a methodology to determine a project's fair share percentage towards the eventual costs of improvements towards Caltrans' facilities, and the Project will contribute that fair share percentage. This mitigation is feasible and will mitigate the Project's and Alternative 4's respective impacts to off-ramp queues to less than significant levels. Therefore, the Project's and Alternative 4's impacts would be less than significant with implementation of mitigation.

The construction of either Alternative 4 or the Project could lead to potential traffic impacts during construction. However, those impacts will be temporary. With incorporation of the Construction Management Plan impacts associated with traffic from construction of either Alternative 4 or the Project would be less than significant.

With respect to the grading component, assuming minimal carpooling amongst workers, the 20 workers would result in a total of 18 vehicle trips to and from the Project Site on a daily basis. With the implementation of the Construction Management Plan, it is anticipated that almost all haul truck activity to and from the Project Site would occur outside of the morning and afternoon peak hours. In addition, worker trips to and from the Project Site would also occur outside of the peak hours. Further, construction-related trips are anticipated to be fewer than the trips associated with the existing uses of the Project Site that would be removed from the study area during construction. Therefore, no peak hour construction traffic impacts for either Alternative 4 or the Project are expected during the excavation and grading phase of construction.

With respect to the construction component, construction-related trips are anticipated to be fewer than the trips associated with the existing uses of the Project Site that would be removed

from the study area during construction. As such, the building phase of construction for either Alternative 4 or the Project is not expected to cause a significant traffic impact at any of the study intersections.

During construction, adequate parking for construction workers would be secured in the vicinity of the Project Site. Restrictions against workers parking in the public right-of-way in the vicinity of (or adjacent to) the Project Site will be identified as part of the Construction Management Plan. Construction parking may require the temporary use of off-site parking areas for materials storage and truck staging.

With respect to parking during construction, construction employees would be required to park on the Project Site and would not be allowed to park on adjacent surface streets. As part of the Construction Management Plan and in consultation with the City's Building and Safety Department, it might be determined that off-site parking and shuttling of construction employees would be a better option for getting construction employees to and from the Project Site. Under either parking option, Alternative 4's and the Project's respective impacts related to traffic construction will remain less than significant.

There are no bus stops adjacent to the Project Site and, therefore, no temporary impacts to transit are expected. Parking is allowed adjacent to the Project Site on Mateo Street so the construction fences could result in the temporary loss of up to six unmetered parking spaces.

Construction of either Alternative 4 or the Project is not expected to create hazards for roadway travelers, bus riders, or parkers, so long as commonly practiced safety procedures for construction are followed. Such procedures and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, etc.) are incorporated into the Construction Management Plan. The construction-related impacts associated with access and transit are anticipated to be less than significant, and the implementation of the Construction Management Plan described below would further reduce those impacts.

With respect to cumulative impacts, any possible overlap of construction, and impacts attributable to construction traffic from concurrent construction, would be addressed through the City's ongoing Construction Management Plans, which would also be required for each of the Related Projects.

Since the construction of either Alternative 4 or the Project could temporarily cause potentially short-term significant impacts, a Construction Management Plan shall be required to ensure construction impacts related to traffic remain less than significant. With incorporation of the Construction Management Plan for Alternative 4 or the Project, impacts will be less than significant.

Reference

For a complete discussion of the Project's impacts associated with traffic, see Section 4.L, Transportation – Traffic, of the Draft EIR. For a complete discussion of Alternative 4's impacts, see Section 6, Alternatives, of the Draft EIR. See also Appendices L-1 through L-3 of the Draft EIR, and Section 2, Responses to Comments, of the Final EIR.

3.0 Significant and Unavoidable Impacts

The Final EIR determined that the environmental impacts set forth below are significant and unavoidable. In order to approve the project with significant unmitigated impacts, the City is required to adopt a Statement of Overriding Considerations, which is set forth in Section XI below. No additional environmental impacts other than those identified below will have a

significant effect or result in a substantial or potentially substantial adverse effect on the environment as a result of the construction or operation of the project. The City finds and determines that:

a) All significant environmental impacts that can be feasibly avoided have been eliminated, or substantially lessened through implementation of the project design features and/or mitigation measures; and

b) Based on the Final EIR, the Statement of Overriding Considerations set forth below, and other documents and information in the record with respect to the construction and operation of the project, all remaining unavoidable significant impacts, as set forth in these findings, are overridden by the benefits of the project as described in the Statement of Overriding Considerations for the construction and operation of the project and implementing actions.

Transportation and Traffic

Description of Effects

Cumulative Impacts (Future Year 2020 Conditions with Project)

Estimates of future traffic conditions both with and without the Project, representing cumulative conditions, were developed to evaluate the potential impacts of the Project on the local street system. This discussion details the assumptions used to develop the Future without Project conditions in 2020, which corresponds to projected completion and occupancy of the Project. The same analysis was performed for Alternative 4.

Existing traffic is expected to increase as a result of regional growth and development outside of the study area. Based on discussions with LADOT through the MOU process, an ambient growth factor of 1 percent per year, compounded annually, was used to adjust the existing traffic volumes to reflect the effects of the regional growth and development by 2020. The total adjustment applied over the four-year period was 4.06 percent. This growth factor accounts for increases in traffic due to potential projects not yet proposed or in the early stages of development, as well as projects outside the downtown Los Angeles area.

In accordance with CEQA requirements, the Project Traffic Study also considers the effects of the Project in relation to other known proposed development projects within the vicinity. The list of cumulative development projects is based on information provided by the Department of City Planning and LADOT, as well as recent studies of projects in the area. There are 183 Related Projects that were considered for purposes of this analysis. Approximately 30 of these projects are within or in the immediate vicinity of the Arts District. Though the buildout years of many of these projects are uncertain and may be well beyond the buildout year of the Proposed Project, and notwithstanding that some may never be approved or developed, they were all considered as part of this traffic study and conservatively assumed to be completed by the Project buildout year of 2020. The traffic growth due to the development of these cumulative development projects considered in this analysis is highly conservative and, by itself, overestimates the actual traffic volume growth in downtown Los Angeles that would likely occur prior to Project buildout year. With the addition of the 1 percent per year ambient growth factor previously discussed, the future cumulative condition is conservative.

Nine of the 21 study intersections would continue to operate at LOS D or better during both the morning and afternoon peak hours under Future with Project Conditions. The remaining 12 intersections would operate at LOS E or F during at least one of the peak hours. Under future (2020) with Project Conditions, the Project is expected to result in significant impacts at 10 of the 21 study intersections, prior to the implementation of mitigation measures. The remaining 11

intersections are not expected to be significantly impacted by the Project under Future with Project Conditions.

With respect to Alternative 4, 9 of the 21 study intersections would continue to operate at LOS D or better during both the morning and afternoon peak hours under Future with Project Conditions. The remaining 12 intersections would operate at LOS E or F during at least one of the peak hours. Under future (2020) with Project Conditions, Alternative 4 is expected to result in significant impacts at 10 of the 21 study intersections, prior to the implementation of mitigation measures. The remaining 11 intersections are not expected to be significantly impacted by Alternative 4 under Future with Project Conditions.

Although significant impacts are identified at the western boundary of the study area under Future with Project Conditions, the Project trips entering and exiting the study area to/from the west are not anticipated to result in a significant impact at the signalized intersections outside of the study area. The signalized intersections of San Pedro Street & 6th Street and San Pedro Street & 7th Street are located to the west of the study area boundary and operate with a total intersection capacity of 1,500 (two-phase signal) and 1,425 vehicles per hour per lane (three-phase signal), respectively. Assuming the Project trips are added to the critical moves of each intersection, the incremental change in V/C ratio with the addition of the Project trips would not result in a significant impact at either intersection, regardless of the LOS. Therefore, the analysis of additional study intersections is not required.

Implementation of Mitigation Measures TR-MM-1 and TR-MM-2 would result in peak hour trip reductions from both the implementation of the TDM program and as a result of the TMO activities. The effectiveness of the proposed traffic mitigation program was analyzed by applying the appropriate trip generation reductions and capacity enhancements from the implementation of the TDM program and the TMO activities that collectively comprise the mitigation measures. Because the continued operation of the TMO after the end of the initial 10-year financial contribution provided by the Project Applicant under Mitigation Measure TR-MM-2 would be dependent upon the participation of other property owners within the designated area, this analysis considers the mitigation of Project traffic impacts under the TDM program and the TMO separately.

The incremental increase in the V/C ratios as a result of the Project would exceed the thresholds of the LADOT significant impacts criteria at a number of study intersections. However, with implementation of mitigation, the Project's cumulative impacts would be significant and unavoidable with at only one intersection. After the implementation of mitigation, Alternative 4 would also cause significant and unavoidable impacts at the same intersection.

Mitigation Measures

TR-MM-1 – The Project shall develop and implement a Transportation Demand Management (TDM) program to promote non-auto travel, reduce the use of single-occupant vehicle trips, etc. The TDM program shall be subject to review and approval by the City of Los Angeles (Department of City Planning and LADOT). The strategies in the TDM program can include, but are not necessarily limited to, the following:

- Transportation Information Center, educational programs, kiosks and/or other measures
- Promotion and support of carpools and rideshare
- Bicycle amenities such as racks and showers
- Guaranteed ride home (GRH) program

- Incentives for using alternative travel modes
- Parking incentives and administrative support for formation of carpools/vanpools
- On-site TDM coordinator
- Contribution to the City of Los Angeles Bicycle Plan Trust Fund for implementation of bicycle improvements in the Project area
- Mobility hub support

The TDM program outlined below details a set of strategies proposed for the Project designed to reduce peak hour vehicular traffic to and from the Project Site. It is a comprehensive program of design features, transportation services, education programs, and incentive programs intended to reduce the impact of traffic from employees and visitors to the Project Site during the most congested time periods of the day. The following provides further information and description of the above-listed TDM program strategies.

Educational Programs. A key component of a successful TDM program is to make residents, employers, and employees at the Project Site aware of the various programs offered. To this end, a TDM coordinator on the building management staff would reach out to residents, employers, and employees directly to promote the benefits of TDM.

A Transportation Information Center is a centrally-located commuter information center where project employees, tenants, and patrons can obtain information regarding commute programs, and individuals can obtain real-time information for planning travel without using an automobile. A Transportation Information Center will support orientation for new residents and employees as well as providing information about transit schedules, commute planning, rideshare, telecommuting, and bicycle and pedestrian plans.

Project Design Features to Promote Bicycling and Walking. A significant and growing number of people in the City prefer to ride bicycles or walk to their employment given sufficient facilities to make the commute feel safe and convenient. The Project would incorporate features for bicyclists and pedestrians, such as exclusive access points, secured bicycle parking facilities or a bicycle valet system, a bicycle sharing or rental program, or showers. Additionally, the Project Site would be designed to be a friendly and convenient environment for pedestrians.

The Project would contribute a one-time fixed fee to be deposited into the Bicycle Plan Trust Fund to implement bicycle improvements in the Arts District.

Ridesharing Services and Transportation Assurance Programs. The TDM program would provide services to match employees together to establish carpools and vanpools, and encourage their use by providing a GRH program. Carpools/vanpools provide the potential for employees to come to work relaxed and/or work during the commute and reduce the number of vehicle trips to and from the Project Site. A GRH program assures transportation service to individuals who commute without their personal automobiles. This program overcomes one of the primary objections of those who could choose alternative modes of transportation, which is how to get home or to a child's school in the case of an emergency. The GRH program would cover all employees participating in the carpool/vanpool program or using transit to and from the Project Site in the event of personal or family emergencies. The individual would be reimbursed for a taxi ride or short-term car rental. A support service such as GRH is an important part of TDM implementation that assures an individual he or she will not be "stuck" depending on a ridesharing or transit schedule in the event of an emergency.

Short-Term Car Rentals. The Project would partner with short-term car rental services such as Zip-Car or Car-to-Go, which would provide vehicles available to users for hourly rentals at strategic locations within the downtown Los Angeles area. Similar to the GRH program, this service offers assurance to users of alternative modes of transit that they have options should the need arise to leave at an unscheduled time. Short-term car rentals can be used to travel to business meetings, lunch, or in emergencies, and can provide the source of emergency transportation for those using the GRH program.

Incentives for Using Alternative Travel Modes. The TDM program could incorporate various incentives for use of its programs. For example, eligible employees could be provided with *discounted* monthly transit passes for Metro rail and bus service. Carpool and vanpool users could be offered preferential load/unload areas or convenient designated parking spaces. Those who choose not to drive their own cars and park them at the Project Site could receive a "parking cash-out" subsidy, returning a fee that would otherwise cover the cost of parking. Unbundled parking is a program wherein parking spaces are rented separately from the building space, which allows for a separate charge for parking and the flexibility to vary the number of spaces rented. Unbundling parking is an essential first step toward getting people to understand the economic cost of parking. Without unbundled parking, tenants often assume that parking is free.

Mobility Hub Support. The Project would support existing and/or future efforts by LADOT to provide *first*-mile and last-mile service for transit users through the mobility hub program. Mobility hubs, typically located at or near public transit centers, would provide amenities such as, but not limited to, bicycle parking and rentals, short-term vehicle rentals, and transit information. In cooperation with the proposed Transportation Management Organization (TMO) in the Arts District detailed under Mitigation Measure L-4 below, the Project could provide space for similar amenities at the Project Site to complement future mobility hubs in the study area.

Bikeway Improvements. The Project would contribute $100,000 toward the implementation of bicycle *improvements* within the study area as identified in the 2010 Bicycle Plan and Mobility Plan.

TR-MM-2 – The Project Applicant shall initiate, fund, and market an Arts District Transportation Management Organization (TMO)/Arts District portion of a Downtown TMO to oversee the development, implementation, and operation of TDM strategies and help alleviate current and future traffic congestion throughout the area. The TMO services shall be available to anyone within the general Arts District community, not just residents and tenants of the Proposed Project. The Project Applicant shall agree to initiate and provide seed funding for either the Arts District TMO or the Arts District portion of a Downtown TMO following approval of the Proposed Project by funding TMO operations and marketing efforts. While the City of Los Angeles is still in the early stages of establishing the Downtown/Arts District TMO, similar TMO organizations in Los Angeles have initial budgets of $200,000 to set up and run the first year and an additional $100,000 to maintain and operate each year thereafter. These costs include development of the TMO, the salary of a part-time TMO manager, and marketing. The Project Applicant shall commit the $200,000 required in the first year to cover the cost of launching the Arts District TMO/Arts District portion of a Downtown TMO and shall commit to nine additional years (10 years in total) as a charter member at annual dues of $25,000. It is anticipated that with almost 30 projects proposed for the Arts District, other major projects will want to join the TMO and participate in the trip-reducing programs of the organization.

A TMO is an organization that oversees the development, implementation, and operation of TDM strategies within a particular study area. Developers, building owners, and businesses are members of the TMO, paying annual dues to support the activities of the TMO. The City

of Los Angeles is in the process of forming a Downtown Los Angeles TMO and there is discussion as to whether the TMO would treat downtown Los Angeles as one study area or whether the area would be divided into separate districts. Under either approach, the Arts District would be covered by a TMO.

The Arts District community is a strong candidate for alternative modes of transportation, including walking and bicycling, carpooling and vanpooling, use of public transit, short-term automobile rentals, etc. At present, there is no organization to administrate and promote these options to the public. The Downtown/Arts District TMO would be an organization that helps to promote these services to the community by providing information about available public transportation options and matching people into ridesharing services.

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

These same mitigation measures would apply to Alternative 4.

Finding

Each decision making body of the City finds that all feasible mitigation measures to substantially reduce or avoid the project's traffic impacts have been incorporated into the project.

In accordance with CEQA Guidelines Section 15091, the City finds that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen these significant environmental impacts. The City also finds that specific economic, legal, social, technological or other considerations, including provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or project alternatives. However, while implementation of mitigation measures will reduce the impacts, the project's traffic impact will be significant and unavoidable.

Rationale for Finding

TDM Program Trip Reduction (Mitigation Measure TR-MM-1)

The combined effect of the various strategies implemented as part of the TDM program would result in a reduction in peak hour trip generation by offering services, actions, specific facilities, etc., aimed at encouraging use of alternative transportation modes (e.g., transit, bus, walking, bicycling, carpool, etc.) Trip Generation Handbook, 3nd Edition provides a summary of research of TDM programs at many different employers. Case studies of TDM program implementations are detailed in Appendix E of the Project Traffic Study (see Appendix L-1 to the Draft EIR). At places that had the most comprehensive programs, including both economic incentives (e.g., transit passes, etc.) and support services, the programs resulting in an average 24 percent reduction in commuter vehicles. Thus, as an achievable but conservative performance standard, an overall TDM trip reduction credit of 20 percent was assumed for implementation of Mitigation Measure TR-MM-1.

Thus, the TDM program is expected to result in a reduction of 883 daily trips, including 78 morning peak hour trips and 90 afternoon peak hour trips. The Project, when fully built and occupied and with implementation of the TDM program, would generate a total of 4,112 daily trips, including 299 morning peak hour trips (123 inbound, 176 outbound) and 407 afternoon peak hour trips (229 inbound, 178 outbound). Alternative 4, when fully built and occupied and with implementation of the TDM program, would generate a total of 3,618 daily trips, including 314 morning peak hour trips (172 inbound, 142 outbound) and 376 afternoon peak hour trips (175 inbound, 201 outbound).

The Project and Alternative 4 would be subject to annual monitoring to ensure that the actual trips reductions are consistent with the TDM performance standards. The monitoring program would continue until the Project or Alternative 4 have shown that achievement of the standards have been met consistently for the duration of time determined by LADOT. Exceedances would trigger additional measures to ensure the performance standards are met, and would include for example enhancements to the components of the TDM program to increase the effectiveness of TDM in meeting trip reduction goals, the purchasing of additional transit passes, or monetary payments to fund area-wide transportation improvements that will ensure impacts are mitigated below significance. As detailed in the LADOT Assessment Letter, the preliminary TDM program would be prepared and provided for LADOT review prior to the issuance of the first building permit, and a final TDM program approved by LADOT is required prior to the issuance of the first certificate of occupancy for the Project. These requirements will ensure compliance.

TMO Trip Reduction (Mitigation Measure TR-MM-2)

As noted above, an operating TMO within the study area could lead to as much as a 10 percent reduction in vehicular traffic for trips originating or ending within the Downtown/Arts District TMO area. The Federal Grant supporting the formation of the Downtown TMO was approved on January 15, 2018. The Articles of Incorporation were signed by LADOT and FASTLinkDTLA in April 2018. As detailed in Response to Comment No. B4-24 of the Final EIR, the Downtown TMO would provide or promote on an area-wide scale, including the Arts District and the Project site, services such as employee flex time and modified work schedules, vanpool/carpool programs, non-vehicular commuting, information on alternative travel modes, multi-employer vanpools, promotion and implementation of pedestrian, and bicycle and transit stop enhancements. The TMO would therefore promote the use of transit and the City's bike share and car share programs. Travel analyses in urban Los Angeles show that more than half of the trips within a specific urban zone have a trip length of less than five miles. Thus, approximately 50% of trips in the Downtown/Arts District area have the potential to be directly reduced by the TMO programs. Areas such as the Warner Center, Century City, and Burbank have all run successful TMO's where single-passenger vehicle trips have been reduced substantially and would be expected to reduce single-passenger vehicle trips by as much as 15 percent while increasing transit ridership, use of ridesharing, and non-automotive modes of transportation such as walking and bicycling. Overall, since the Downtown/Arts District TMO is expected to approach the effectiveness of those TMOs, the Downtown/Arts District TMO would be anticipated to reduce vehicular traffic for trips originating or ending within area by 10 percent. Recognizing that some of the trips on the streets in the Arts District are trips merely passing through, the 10 percent trip reduction was conservatively reduced to a 7 percent performance standard for overall reductions in vehicular traffic.

Given the Project Applicant's commitment (under Mitigation Measure TR-MM-2) to fund the start-up of the TMO for the Arts District, the Proposed Project and Alternative 4 each would receive credit from LADOT for a 1 percent increase in the intersection capacity of the study area intersections as a result of the trip reduction programs operated by the TMO. That credit conservatively assumes a lower rate of overall trip reduction than the 7 percent reduction discussed above. Other major projects within the study area could make similar initial

contributions to the TMO and similar commitments to annual dues and receive similar credits for trip reductions/intersection capacity increases.

Future (2020) with Project Traffic Conditions with Mitigation

The Project-only with Mitigation traffic volumes were also added to the Future (2020) without Project morning and afternoon peak hour traffic volumes. The changes in the V/C ratios at all but one of the 21 study intersections during the weekday morning and afternoon peak hours would be reduced to less than significant levels with implementation of the mitigation program (with the Arts District TMO). Study Intersection No. 15 (Santa Fe Avenue & 7th Street) would continue to have a significant impact even with implementation of the proposed Mitigation Measures for either the Project or Alternative 4. As determined upon consultation with LADOT, no intersection or signalization improvements are available at this intersection. Thus, both Alternative 4 and the Project would have a significant and unavoidable impact at this intersection.

If the proposed TMO in Mitigation Measure TR-MM-2 is not continued past the end of the initial funding period provided by the Project Applicant, as shown in Table 4.L-23, nine of the 10 significantly impacted intersections would remain as significant and unavoidable impacts for either Alternative 4 or the Project.

Since either Alternative 4 or the Project would have significant cumulative impacts associated with traffic, Mitigation Measures TR-MM-1 and TR-MM-2 shall be required to reduce those impacts. With implementation of those mitigation measures, impacts will remain significant and unavoidable at one of the 21 study intersections for either Alternative 4 or the Project.

Reference

For a complete discussion of the project's impacts associated with traffic, see Section 4.L, Transportation and Traffic, and Appendices L-1 through L-3, of the Draft EIR. For a complete discussion of Alternative 4's impacts, see Section 6, Alternatives, of the Draft EIR. See also Appendices L-1 through L-3 of the Draft EIR, and Section 2, Responses to Comments, of the Final EIR.

4.0 ALTERNATIVES

CEQA requires that an EIR analyze a reasonable range of feasible alternatives that could substantially reduce or avoid the significant impacts of a project while also meeting the project's basic objectives. An EIR must identify ways to substantially reduce or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1). Accordingly, the discussion of alternatives shall focus on alternatives to a project or its location which are capable of avoiding or substantially reducing any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The alternative analysis included in the Draft EIR, therefore, identified a reasonable range of project alternatives focused on avoiding or substantially reducing the project's significant impacts.

Summary of Findings

Based upon the following analysis, the City finds, pursuant to CEQA Guidelines Section 15096(g)(2), that no feasible alternative or mitigation measure will substantially lessen any significant effect of the project, reduce the significant unavoidable impacts of the project to a level that is less than significant, or avoid any significant effect the project would have on the environment.

Project Objectives

Section 15124(b) of the California Environmental Quality Act (CEQA) Guidelines states that a project description shall contain "a statement of the objectives sought by the proposed project." In addition, Section 15124(b) of the State CEQA Guidelines further states that "the statement of objectives should include the underlying purpose of the project." The objectives of the Proposed Project are as follows:

1. Redevelop a currently underutilized site into a mixed-use development that combines complementary uses, such as community serving retail and live/work uses.

Supporting objectives of the Project are as follows:

2. Improve the aesthetic quality of the site by removing older structures and developing new efficient buildings that are consistent with others within the burgeoning Arts District.

3. Create a range of construction and permanent jobs.

4. Improve public safety by creating a development that provides the level of density and mix of uses necessary to activate the area both day and night.

5. To meet the demand for urban housing within the general Downtown area and specifically within the Arts District.

6. Provide housing in proximity to the Metro Gold Line Station and other mass transit opportunities.

7. To develop an economically feasible project featuring a high level of quality in architectural design and building construction that can serve as a northern gateway to the Arts District.

Alternatives Analyzed in the Draft EIR and Final EIR

CEQA requires that an EIR analyze a reasonable range of feasible alternatives that could substantially reduce or avoid the significant impacts of a project while also meeting a project's basic objectives.

Each decision-making body of the City finds that given the potential impacts of the project, the Final EIR considered a reasonable range of alternatives to the project to provide informed decision-making in accordance with Section 15126.6 of the CEQA Guidelines.

Based on the significant environmental impacts of the project and the objectives established for the project, the following alternatives to the project were evaluated in the Final EIR:

- Alternative 1: No Project
- Alternative 2: Reconfigured/Reduced Project
- Alternative 3: Reduced Commercial Density
- Alternative 4: Reduced Residential/Increased Commercial Density

- Alternative 5: Apartments/Increased Commercial

Alternative 1 - No Project

Description of Alternative

Under the No Project Alternative, the Project would not be implemented and the Project Site would remain in its existing conditions. The No Project Alternative assumes the Related Projects would move forward. Future on-site activities would be limited to the continued operation and maintenance of existing land uses, specifically the warehouse distribution center.

Impact Summary of Alternative

The No Project Alternative's impact would have no impacts on aesthetics, as the alternative would not create a change in the visual character of the Project Site, block view sheds, create shadows on adjacent land uses, or create new sources of glare and lighting. For the same reasons as the Project and Alternative 4, the No Project Alternative would have no impact to agricultural and forestry resources. This Alternative would also have no impact with respect to air quality since as no demolition, grading, or construction would occur and no new vehicle trips would be generated under this Alternative. Alternative 1 would also have no impact with respect to biological resources, as the Project Site is currently developed and does not contain any natural open spaces, act as a wildlife corridor, contain riparian habitat, wetland habitat, migratory corridors, and does not possess any significant biological resources. Alternative 1 would have no impacts to significant historical, cultural or tribal resources since no demolition or other construction would occur. Alternative 1 would have slightly greater impacts with respect to geology because this alternative would not involve new construction of seismically superior buildings on the Project Site due to updates in the Building Code.

Further, this Alternative would not be expected to result in increased GHG emissions, as it would not increase electricity and natural gas consumption, vehicle miles traveled, water use, or solid waste generation. Alternative 1 would have no impact to hazards and hazardous materials, since there would be no demolition or construction and the alternative would not have the potential to encounter contaminated soil, asbestos, and lead-based pain at the Project Site. Alternative 1 would not involve any impacts to hydrology and water quality since no new development would occur. Alternative 1 would result in no impacts to land use and planning, as the alternative is consistent with existing zoning and land use plans. Alternative 1 would have no impact to mineral resources, as the Project Site is not located within a designated oil drilling area or a designed Mineral Resource Zone. Alternative 1 would have no impact with respect to noise, as no new sources of noise or vibration would be created because no demolition or construction would occur. Alternative 1 would have no impact to population and housing, as there would be no development would add population, housing, or employment to the Project Site. Alternative 1 would have no impact on public services, as no additional demand for public services beyond the existing demand from land uses currently on the Project Site would occur. Alternative 1 would result in no impacts to transportation and traffic, as no traffic would be generated beyond the traffic already associated with land uses currently at the Project Site. Alternative 1 would result in no impact with respect to utilities, as it would not lead to impacts related to wastewater, water, solid waste, electricity, or natural gas beyond the existing demand associated with the land uses currently on the Project Site.

Finding

With respect to Alternative 1, each decision making body of the City adopts the third possible finding as outlined above in Subsection III, which states that "specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR." (CEQA Guidelines Section 15091(a)(3)).

Rationale for Finding

No new development would occur under the No Project Alternative and the project site would continue to operate as it does currently. As such, Alternative 1 would not meet the underlying purpose of the project or the project objectives. While the No Project Alternative would not result in the significant impact related to traffic, it would not satisfy any of the Project's objectives. Accordingly, each decision making body of the City rejects the No Project as infeasible.

Reference

For a complete discussion of impacts associated with Alternative 1, see Section 6, Alternatives, of the Draft EIR.

Alternative 2 – Reconfigured/Reduced Project

Description of Alternative

Alternative 2 would involve the demolition of all existing buildings on the Project Site. The Reconfigured/Reduced Project Alternative (Alternative 2) would develop nearly the same land uses and densities as the Proposed Project with the only difference being a reduction of 10 live/work units, but would configure the development differently across the Project Site. Alternative 2 would develop 590 live/work units, as well as the same amount of office (20,000 square feet), retail (15,000 square feet), restaurant (15,000 square feet), and cultural (10,000 square feet) space. Alternative 2 would develop the live/work units in a tower building above a two-and-a-half level (above street grade) podium base that would contain the commercial, office, and cultural uses and parking space. Under Alternative 2, the live/work units would be bunched largely in the northeastern portion of the site such that the tower building would be configured in a C shape, open to the south, with the western and north-central portions of the tower being 22 stories and 240 feet in height above street grade and the north-eastern and eastern portions of the tower being 10 stories and 109 feet in height above street grade. Although the main building would be built to a height of 240 feet, a provision for facilities serving the rooftop amenities would project an additional 12 feet for a total maximum building height of 252 feet.

Essentially, the majority of the live/work units would be grouped in the center of the Project Site under Alternative 2. The height of the podium base would remain the same as with the Proposed Project, with the result being that, under Alternative 2, building heights along the west, southwest, and northwest edges of the site would reflect the height of the podium only, ranging from approximately 20 to 33 feet above street grade.

Impact Summary of Alternative

Alternative 2's impacts related to aesthetics would be less than significant, as Alternative 2 would not affect any scenic vistas or significant view corridors and the architecture, height and massing would be compatible with the surrounding properties. Also, Alternative 2 would not cause any significant impacts associated with nighttime lighting or signage. Alternative 2 would have no impact to agricultural and forestry resources, as the Project Site does not contain any agricultural or forestry uses. After implementation of mitigation measures, construction and operation of Alternative 2 would not cause any significant impacts related to localized or regional air quality. Alternative 2 would also have no impact with respect to biological resources, as the Project Site is currently developed and does not contain any natural open spaces, act as a wildlife corridor, contain riparian habitat, wetland habitat, migratory corridors, and does not possess any areas of significant biological resources. Alternative 2 would not cause any significant impacts to cultural, tribal or historical resources, and conditions of approval and regulatory measures would address any unknown resources encountered during construction. Alternative 2 would have the same potential impacts to geology and soils, as the Project Site presents the same potential geologic and geotechnical conditions regardless of the type of development, and Alternative 2 would be required to conform to the City's building code standards. With respect to GHG emissions, construction and operation of Alternative 2 would

cause less than significant impact since it would be consistent with all applicable plans and regulations concerning GHG emissions.

Alternative 2 would have similar impacts as the Project to hazards and hazardous materials, as Alternative 2 would have the potential to result in impacts with respect to contaminated soil, asbestos, and lead-based paint at the Project Site. However, those impacts can be mitigated, in addition to other measures, by the development and implementation of a Soil Management Plan. Alternative 2 would also develop uses on the Project Site that involve the transport, use, or disposal of hazardous materials that are typical for retail use, but would not cause any significant impacts. Alternative 2 would result in less than significant impacts to water hydrology and water quality since runoff from the Site does not discharge to the Los Angeles River and all applicable regulations concerning water quality would be satisfied. Further, Alternative 2 would be consistent with applicable land use policies for the same reasons as the Project and Alternative 4.

Alternative 2's noise impacts attributable to construction and operation would be less than significant, and similar to the Project and Alternative 4, after implementation of mitigation measures. For the same reasons as with the Project and Alternative 4, Alternative 2 would not cause a significant impact as to housing and employment. Alternative 2's impacts to public services would be less than significant with respect to fire protection, police protection, schools, parks and recreation, and libraries since Alternative 2 proposes only 10 fewer live/work units than the Project and the Project's impacts in those areas are less than significant. Alternative 2 would generate slightly fewer daily vehicle trips since ten fewer live/work units would be developed. However, after implementation of mitigation measures, Alternative 2 would result in a significant and unavoidable traffic impact to the intersection that would be significantly impacted by the Project as well as Alternative 4. Alternative 2 would generate a similar amount of wastewater, demand less water, and generate less solid waste as compared to the Proposed Project, and such impacts would be less than significant.

In sum, Alternative 2 would not avoid the significant traffic impact related to the Project's operation of the Project or Alternative 4.

Finding

With respect to Alternative 2, each decision making body of the City finds pursuant to CEQA Guidelines section 15126.6 that Alternative 2 would be consistent with all of the secondary Project Objectives to the same degree as the Proposed Project with the exception of the objective to meet the demand for urban housing within the Downtown/Arts District, which Alternative 2 would achieve but to a slightly lesser degree than would the Proposed Project.

Rationale for Finding

Alternative 2 would meet the basic project objective to revitalize and redevelop the Project Site with a mixed-use development that combines complementary uses, such as community serving retail and live/work uses. Alternative 2 would attain this basic project objective to the same degree as the Project and Alternative 4.

With respect to the secondary Project objectives, Alternative 2 would improve the aesthetic quality of the site by removing older structures and developing new efficient buildings that are consistent with others within the Arts District. Alternative 2 would provide a range of construction and permanent jobs and would improve public safety by creating a development that provides the level of density and mix of uses necessary to activate the area both day and night. Alternative 2 would also meet the demand for urban housing within the general Downtown area and specifically within the Arts District, although Alternative 2 would not create as much housing as the Proposed Project. Alternative 2 would provide housing in proximity to the Metro Gold Line Station and other mass transit opportunities. Alternative 2 would develop an economically

feasible project featuring a high level of quality in architectural design and building construction that can serve as a northern gateway to the Arts District.

Reference

For a complete discussion of impacts associated with Alternative 2, see Section 6, Alternatives, of the Draft EIR.

Alternative 3 – Reduced Commercial Density

Description of Alternative

Alternative 3 would involve demolition of all existing buildings on the Project Site and would consist of the Reduced Commercial Density Project Alternative (Alternative 3) and would develop the same mix of land uses, but would reduce the number of proposed live/work units from 600 to 500 and would reduce the proposed commercial space from 60,000 square feet to 20,000 square feet, eliminating the cultural space and the office space and reducing the retail and restaurant space from 15,000 square feet each to 10,000 square feet each. In addition, the development would be configured differently with a single 85-foot high, eight-story building surrounding an interior elevated courtyard. Under Alternative 3, the podium base (Levels 1-3) would consist of concrete frame construction, while the upper levels containing the live/work units (Levels 4-8) would consist of wood frame construction.

Alternative 3 would develop 500 live/work units, as well as retail (10,000 square feet), and restaurant (10,000 square feet) space. Alternative 3 would develop the live/work units in a tower building above a two-and-a-half level (above street grade) podium base that would contain the commercial and office uses and parking space. However, as noted above, under Alternative 3, the live/work units would surround a central courtyard area that would be located on top of the podium base. No portion of this courtyard area would be visible from off-site as the upper floors would completely surround it. The height of the podium base would be lower (approximately 17 feet above street grade) than with the Proposed Project, although the upper floors would rise consistently above the base to the roofline on all four sides of the Project Site. Thus, when viewed from any direction, the proposed building would be 85 feet above street grade along the perimeter of the Project Site.

Impact Summary of Alternative

Alternative 3's impacts related to aesthetics would be less than significant, as Alternative 3 would not affect any scenic vistas or significant view corridors and the architecture, height and massing would be compatible with the surrounding properties. Also, Alternative 3 would not cause any significant impacts associated with nighttime lighting or signage. Alternative 3 would have no impact to agricultural and forestry resources, as the Project Site does not contain any agricultural or forestry uses. After implementation of mitigation measures, construction and operation of Alternative 3 would not cause any significant impacts related to localized or regional air quality. Alternative 3 would also have no impact with respect to biological resources, as the Project Site is currently developed and does not contain any natural open spaces, act as a wildlife corridor, contain riparian habitat, wetland habitat, migratory corridors, and does not possess any areas of significant biological resources. Alternative 3 would not cause any significant impacts to cultural, tribal or historical resources, and conditions of approval and regulatory measures would address any unknown resources encountered during construction. Alternative 3 would have the same potential impacts to geology and soils, as the Project Site presents the same potential geologic and geotechnical conditions regardless of the type of development, and Alternative 3 would be required to conform to the City's building code standards. With respect to GHG emissions, construction and operation of Alternative 3 would cause less than significant impact since it would be consistent with all applicable plans and regulations concerning GHG emissions.

Alternative 3 would have similar impacts as the Project to hazards and hazardous materials, as Alternative 3 would have the potential to result in impacts with respect to contaminated soil,

asbestos, and lead-based paint at the Project Site. However, those impacts can be mitigated, in addition to other measures, by the development and implementation of a Soil Management Plan. Alternative 3 would also develop uses on the Project Site that involve the transport, use, or disposal of hazardous materials that are typical for retail use, but would not cause any significant impacts. Alternative 3 would result in less than significant impacts to water hydrology and water quality since runoff from the Site does not discharge to the Los Angeles River and all applicable regulations concerning water quality would be satisfied. Further, Alternative 3 would be consistent with applicable land use policies for the same reasons as the Project and Alternative 4.

Alternative 3's noise impacts attributable to construction and operation would be less than significant, and similar to the Project and Alternative 4, after implementation of mitigation measures. For the same reasons as with the Project and Alternative 4, Alternative 3 would not cause a significant impact as to housing and employment. Alternative 2's impacts to public services would be less than significant with respect to fire protection, police protection, schools, parks and recreation, and libraries since Alternative 3 proposes less residential and commercial uses. Alternative 3 would generate fewer daily vehicle trips given its reduced density, and, therefore, Alternative 3 would avoid the significant traffic impact to the intersection that would be significantly impacted by the Project as well as Alternative 4. Alternative 3 would generate less wastewater, demand less water, and generate less solid waste as compared to the Proposed Project or Alternative 4 given its reduced density, and such impacts would be less than significant.

In sum, Alternative 3 would avoid one significant traffic impact related to operation of the Project or Alternative 4.

Finding

With respect to Alternative 3, each decision making body of the City finds pursuant to CEQA Guidelines section 15126.6 that Alternative 3 would be consistent with the Project Objectives but to a lesser degree than the Proposed Project since it would completely eliminate office uses and reduce other uses.

Rationale for Finding

Alternative 3 would meet the basic project objective to revitalize and redevelop the Project Site with a mixed-use development that combines complementary uses, such as community serving retail and live/work uses, although Alternative 3 would meet this basic project objective to a lesser degree given the elimination of the office space and reduction in restaurant and retail space.

With respect to the secondary project objectives, Alternative 3 would improve the aesthetic quality of the site by removing older structures and developing new efficient buildings that are consistent with others within the Arts District. Alternative 3 would provide a range of construction jobs, but far fewer permanent jobs than the Project or Alternative 4 due largely to the elimination of the office space and reduction in restaurant and retail space. Alternative 3 would improve public safety by creating a development that provides the level of density and mix of uses necessary to activate the area both day and night. Alternative 3 would also meet the demand for urban housing within the general Downtown area and specifically within the Arts District, although Alternative 3 would not create as much housing as the Proposed Project. Alternative 3 would provide housing in proximity to the Metro Gold Line Station and other mass transit opportunities. Alternative 3 would develop an economically feasible project featuring quality architectural design that can serve as a northern gateway to the Arts District, although the aesthetic appearance of the architectural features necessitated by the change to wood-frame construction may be less appealing to some and the loss of the cultural space would lessen the development's ability to serve the needs of local artists.

Reference

For a complete discussion of impacts associated with Alternative 3, see Section 6, Alternatives, of the Draft EIR.

Alternative 4 – Reduced Residential/Increased Commercial Density

Description of Alternative

Alternative 4 would involve the demolition of all existing buildings on the Project Site. The Reduced Residential/Increased Commercial Density (Alternative 4) would develop 125 fewer live/work units (475) and 85,000 square feet more office space (105,000) than the Proposed Project. The amount of retail and restaurant space built under Alternative 4 would be reduced by 5,000 square feet each, or 10,000 total square feet, as compared to the Project, and the cultural space would be eliminated. Alternative 4 would be configured differently across the Project Site than the Proposed Project. Alternative 4 would develop 475 live/work units, as well as 105,000 square feet of office, 10,000 square feet of retail, and 10,000 square feet of restaurant space. As with the Proposed Project, Alternative 4 would develop the live/work units in a tower building above a two-and-a-half level (above street grade) podium base that would contain the commercial uses and the above-grade parking spaces. However, under Alternative 4, the live/work units would be contained in a rectangular tower building occupying the east-central portion of the Project Site. The live/work tower would be 370 feet in height above street grade, including the rooftop penthouse. An elevated courtyard on top of the podium base would occupy the southeastern portion of the site and would contain a variety of open space amenities for the use of residents, tenants, guests, and visitors. This courtyard would be located approximately 35 feet above street grade. The office portion of the Project would be contained in a separate six-story tower on top of the podium base to the west of the live/work tower on the Mateo Street side of the site. The office component would have a height of approximately 91 feet above street grade, excluding mechanical rooftop extensions.

Impact Summary of Alternative

Detailed Findings are made in Sections IV through VI above, with respect to the potential environmental impacts of Alternative 4.

Finding

With respect to Alternative 4, each decision making body of the City finds pursuant to CEQA Guidelines section 15126.6 that Alternative 4 would be consistent with all of the secondary Project Objectives to the same degree as the Proposed Project with the exception of the objective to meet the demand for urban housing within the Downtown/Arts District, which Alternative 4 would achieve to a lesser degree than would the Proposed Project due to a reduction in the total number of dwelling units. However, Alternative 4 meets almost all of the Project Objectives to the same extent of the Proposed Project, would not cause any significant and unavoidable impacts not caused by the Proposed Project, and would not significantly worsen the Project's one significant traffic impact at Santa Fe Avenue and 7th Street. Therefore, Alternative 4 can be approved by the City as the project.

Rationale for Finding

Alternative 4 would meet the basic project objective to revitalize and redevelop the Project Site with a mixed-use development that combines complementary uses, such as commercial, community serving retail, office, and live/work uses. Alternative 4 would attain this basic project objective to essentially same degree as the Proposed Project.

With respect to the secondary Project objectives, Alternative 4 would improve the aesthetic quality of the site by removing older structures and developing new efficient buildings that are consistent with others within the Arts District. Alternative 4 would provide a range of construction and permanent jobs and would improve public safety by creating a development that provides the level of density and mix of uses necessary to activate the area both day and night. Alternative 4 would also meet the demand for urban housing within the general Downtown area

and specifically within the Arts District, although Alternative 4 would not create as much housing as the Proposed Project. Alternative 4 would provide housing in proximity to the Metro Gold Line Station and other mass transit opportunities. Alternative 4 would develop an economically feasible project featuring a high level of quality in architectural design and building construction that can serve as a northern gateway to the Arts District.

Reference

For a complete discussion of impacts associated with Alternative 4, see Section 6, Alternatives, of the Draft EIR.

Alternative 5 – Apartments/Increased Commercial Density

Description of Alternative

The Apartments/Increased Commercial Density (Alternative 5) would develop the same number of residential units (600) as the Proposed Project; however, the units would be traditional apartments rather than live/work units. Alternative 5 would also increase the amount of commercial office space from 20,000 to 105,000 square feet. The amount of retail and restaurant space built under Alternative 5 would be reduced by 5,000 square feet each, or 10,000 total square feet as compared to the Project, and the cultural space would be eliminated. Alternative 5 would be configured differently across the Project Site than the Proposed Project and would have the same maximum height as Alternative 4. Alternative 5 would develop 600 apartment units, as well as 105,000 square feet of office, 10,000 square feet of retail, and 10,000 square feet of restaurant space. Alternative 5 would develop the apartment units in a tower building above a two-and-a-half level (above street grade) podium base that would contain the commercial uses and the above-grade parking spaces. Under Alternative 5, the apartment units would be contained in a rectangular tower building occupying the east-central portion of the Project Site. The residential tower would be 370 feet in height above street grade. An elevated courtyard on top of the podium base would occupy the eastern portion of the site and would contain a variety of open space amenities for the use of residents, tenants, guests, and visitors. This courtyard would be located approximately 35 feet above street grade. The office portion of the Project would be contained in five levels on top of the podium base to the west of the apartment tower on the Mateo Street side of the site. The office component would have a height of approximately 91 feet above street grade.

Impact Summary of Alternative

Alternative 5's impacts related to aesthetics would be less than significant, as Alternative 5 would not affect any scenic vistas or significant view corridors and the architecture, height and massing would be compatible with the surrounding properties. Also, Alternative 5 would not cause any significant impacts associated with nighttime lighting or signage. Alternative 5 would have no impact to agricultural and forestry resources, as the Project Site does not contain any agricultural or forestry uses. After implementation of mitigation measures, construction and operation of Alternative 5 would not cause any significant impacts related to localized or regional air quality. Alternative 5 would also have no impact with respect to biological resources, as the Project Site is currently developed and does not contain any natural open spaces, act as a wildlife corridor, contain riparian habitat, wetland habitat, migratory corridors, and does not possess any areas of significant biological resources. Alternative 5 would not cause any significant impacts to cultural, tribal or historical resources, and conditions of approval and regulatory measures would address any unknown resources encountered during construction. Alternative 5 would have the same potential impacts to geology and soils, as the Project Site presents the same potential geologic and geotechnical conditions regardless of the type of development, and Alternative 5 would be required to conform to the City's building code standards. With respect to GHG emissions, construction and operation of Alternative 5 would cause less than significant impact since it would be consistent with all applicable plans and regulations concerning GHG emissions.

Alternative 5 would have similar impacts as the Project to hazards and hazardous materials, as Alternative 5 would have the potential to result in impacts with respect to contaminated soil, asbestos, and lead-based paint at the Project Site. However, those impacts can be mitigated, in addition to other measures, by the development and implementation of a Soil Management Plan. Alternative 5 would also develop uses on the Project Site that involve the transport, use, or disposal of hazardous materials that are typical for retail use, but would not cause any significant impact. Alternative 5 would result in less than significant impacts to water hydrology and water quality since runoff from the Site does not discharge to the Los Angeles River and all applicable regulations concerning water quality would be satisfied. Further, Alternative 5 would be consistent with applicable land use policies for the same reasons as the Project and Alternative 4.

Alternative 5's noise impacts attributable to construction and operation would be less than significant, and similar to the Project and Alternative 4, after implementation of mitigation measures. For the same reasons as with the Project and Alternative 4, Alternative 5 would not cause a significant impact as to housing and employment. Alternative 5's impacts to public services would be less than significant with respect to fire protection, police protection, schools, parks and recreation, as is the case with the Proposed Project and Alternative 4. Similarly, Alternative 5 would generate a similar amount of wastewater demands for water, and solid waste as compared to the Proposed Project and Alternative 4, and such impacts would be less than significant. Alternative 5 would generate daily vehicle trips such that Alternative 5 would result in the significant and unavoidable traffic impact to the intersection that would be significantly impacted by the Project as well as Alternative 4.

Finding

With respect to Alternative 5, each decision making body of the City finds pursuant to CEQA Guidelines section 15126.6 that Alternative 5 would attain the basic project objective to a lesser degree than the Proposed Project due to the replacement of the live/work uses with traditional apartments, and would be consistent with the secondary Project Objectives to the same degree as the Proposed Project, except for objective 2 and 5 since live/work uses are more consistent with Arts District development than traditional apartments.

Rationale for Finding

Alternative 5 would meet the basic project objective to revitalize and redevelop the Project Site with a mixed-use development that combines complementary uses, such as community serving retail, office, and residential uses. Alternative 5 would attain this basic project objective to a lesser degree than the Proposed Project due to the replacement of the live/work uses with traditional apartments.

With respect to the secondary Project objectives, Alternative 5 would improve the aesthetic quality of the site by removing older structures and developing new efficient buildings that are consistent with others within the Arts District. Alternative 5 would provide a range of construction and permanent jobs and would improve public safety by creating a development that provides the level of density and mix of uses necessary to activate the area both day and night. Alternative 5 would also meet the demand for urban housing within the general Downtown area and specifically within the Arts District. Alternative 5 would provide housing in proximity to the Metro Gold Line Station and other mass transit opportunities. Alternative 5 would develop an economically feasible project featuring a high level of quality in architectural design and building construction that can serve as a northern gateway to the Arts District.

Reference

For a complete discussion of impacts associated with Alternative 5, see Section 6, Alternatives, of the Draft EIR.

Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives. An environmentally superior alternative is an alternative to a project that would reduce and/or eliminate the significant, unavoidable environmental impacts associated with the project without creating other significant impacts and without substantially reducing and/or eliminating the environmental benefits attributable to the project.

Alternative 1 (No Project Alternative) would have the fewest environmental impacts and would not result in any significant and unavoidable impacts. However, the CEQA Guidelines section 15126.6 states that if the No Project Alternative is the environmentally superior alternative, the lead agency must consider another environmentally superior alternative from the remaining list of alternatives considered.

Alternative 3 (Reduced Commercial Density) was selected as the Environmentally Superior Alternative because this alternative would reduce the sole significant and unavoidable impact of the Proposed Project and Alternative 4 (traffic impacts at the intersection of Santa Fe Avenue and 7th Street) to a less than significant level. Alternative 3, however, would not meet the Project Objectives to the same **degree** as either the Project or Alternative 4 because it would develop less commercial space, reducing the multiple environmental benefits that arise from mixed-use development in an urban location.

Alternatives Rejected as Being Infeasible

Section 15126.6(c) of the CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible, and briefly explain the reasons underlying the lead agency's determination. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives can be rejected by the City for specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, that make infeasible the project alternatives identified in the final EIR. Alternatives to the project that have been considered and rejected as infeasible include the following:

Alternative Off-Site Location: An alternative that would develop the Project on a different site (Alternative Site Alternative) was initially considered but rejected as infeasible. Under the Alternative Site Alternative, the Project would be constructed on a site other than the Project Site. This alternative was deemed infeasible as the Project Applicant does not own or control another site of comparable size on a major street within the downtown area of the City of Los Angeles and in close proximity to major transit facilities. Accordingly, any alternative site location would not meet the Project objectives.

5.0 OTHER CEQA FINDINGS

Summary of Significant and Unavoidable Impacts
Pursuant to Section 15126.2(b) of the CEQA Guidelines, the City finds that the Project and Alternative 4 would result in significant and unavoidable environmental impacts with respect to traffic.

Traffic

Project-generated traffic, in combination with traffic generated by other proposed development and growth within the general vicinity of the Project Site, would result in an exceedance of the City's significant impact threshold with respect to level of service (LOS) at the Santa Fe Avenue/7th Street intersection in both the morning and afternoon peak periods. No mitigations are available to either increase intersection capacity or further reduce Project-generated trips at this location beyond what is achievable through Mitigation Measures TR-MM-1 and TR-MM-2. Thus, this would represent a potentially significant and unavoidable impact for the Proposed Project and Alternative 4.

Significant Irreversible Environmental Changes
Pursuant to section 15126.2(c) of the CEQA Guidelines, the City considered the potential significant irreversible environmental changes that could result from the Project. The Project would consume limited, slowly renewable and non-renewable resources. This consumption would occur during the Project's construction and would continue throughout its operational lifetime. Development of the Project or Alternative 4 would require a commitment of resources that would include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and people to and from the Project Site.

Demolition of the buildings on the Project Site would result in production of waste material. However, the Project would recycle and salvage demolition and construction debris, including asphalt, wood, drywall, metals, and other miscellaneous and composite materials. Proper separation of demolition debris would assist environmental clean-up and allow for proper disposal of hazardous materials that may be found within existing buildings. Further, the City passed an ordinance in 2010 that requires all mixed Construction and Demolition ("C&D") waste generated within the City to be taken to certified C&D waste processors. Some of the City's C&D facilities that reuse or recycle C&D waste have already reached a 100 percent recycling rate.

The Project's construction would require consumption of resources that cannot be replenished or which may renew slowly as to be considered non-renewable, including certain types of lumber and other forest products, aggregate materials used in concrete and asphalt, metals, petrochemical construction materials, and water. Fossil fuels, such as gasoline and oil, would also be consumed in the use of construction vehicles and equipment. The commitment of resources required for the type and level of proposed development would limit the availability of these resources for future generations for other uses during operation of the Project. However, this resource consumption would be consistent with growth and anticipated change in the Los Angeles Region.

With respect to operation, the Project would be developed in a densely populated urban area and would provide greater density in close proximity to existing transit, as well as proximate to the Metro Gold Line Little Tokyo/Arts District Station, thereby reducing vehicle miles traveled. This would also potentially reduce, rather than increase, the need for additional infrastructure. Additionally, the Project would incorporate sustainable design features to reduce the Project's environmental impacts.

As a result of the Project's compliance with the applicable conservation and sustainable measures, no significant irreversible environmental changes would result from the Project. The same is true of Alternative 4.

Growth-Inducing Impacts

Pursuant to section 15126.2(d) of the CEQA Guidelines, the City considered the Project's potential growth-inducing impacts, as well as impacts from Alternative 4. Generally, a Project may foster or encourage population growth in a geographic area if it meets any of the following criteria: (i) economic expansion or growth (e.g., changes in revenue base, employment expansion, etc.); (ii) removal of an impediment to growth (e.g., establishment of an essential public service or the provision of new access to an area); (iii) establishment of a precedent-setting action (e.g., an innovation, a change in zoning, or general plan amendment approval); or (iv) development of or encroachment on an isolated adjacent area of open space (being distinct from an "infill" type of encroachment).

Although the Project would provide new live/work, commercial, cultural, and office uses, it would not necessitate the extension of roads or other infrastructure. The Project would be developed in a densely populated urban area and would provide greater density around existing and planned transit. The Project's location would reduce vehicle miles traveled and would potentially reduce, rather than increase, the need for additional infrastructure. Street access and utilities are fully built-out in the area.

The Project responds to the unmet housing demand in both the Central City North Community Plan Area and the City of Los Angeles as a whole. Specifically, the Project would help achieve a portion of the household growth forecast for the City while also being consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of vehicle miles traveled. Thus, while the Project does propose additional housing units, it would not substantially induce housing growth beyond forecasted levels.

The Project's addition of employees could come from the Project area and other areas in the City, especially since the types of land uses are not specialized to compel a net increase in employees from a region outside the local area (or Los Angeles). Employees are assumed to be housed in the local area or Los Angeles, and can access the Site through multiple modes of transit.

The roadways and other infrastructure associated with the Project would not induce growth because they would only serve the Project. The Project Site is already developed and connected to all local utility infrastructures, including water, wastewater, electricity, and natural gas. Therefore, utility infrastructure would not be expanding into a new area as a result of the Project.

Finally, the Project would not provide for the removal of an impediment to growth and will not develop or encroach on an isolated or adjacent area of open space. The Project would not be a public service or provide access to a new area or encroach on open space. The Project would be located on an already developed site in the City that is densely urban and served by roadways.

For all those reasons, the Project and Alternative 4 would not result in a direct significant growth-inducing impact in the project area.

6.0 OTHER CEQA CONSIDERATIONS

1. The City, acting through the Planning Department, is the "Lead Agency" for the Project evaluated in the Final EIR. The City finds that the Final EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the Final EIR, and that the Final EIR reflects the independent judgment of the City.

2. The City finds that the Final EIR provides objective information to assist the decision-makers and the public at large in their consideration of the environmental consequences of the Project. The public review period provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft EIR. The Final EIR was prepared after the review period and adequately responds to comments made during the public review period.

3. The Planning Department evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the Planning Department prepared written responses describing the disposition of significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned responses to the comments. The Planning Department reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR as defined under CEQA. The lead agency has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the Final EIR.

4. The mitigation measures which have been identified for the Project were identified in the text and summary of the Final EIR. The final mitigation measures are described in the Mitigation Monitoring Program. Each of the mitigation measures identified in the Mitigation Monitoring Program, and contained in the Final EIR, is incorporated into conditions of approval for the Project. The City finds that the impacts of the Project have been mitigated to the extent feasible by the mitigation measures identified in the Mitigation Monitoring Program and contained in the Final EIR.

5. CEQA requires the lead agency approving a project to adopt a Mitigation Monitoring Program and make that Program a condition of project approval in order to ensure compliance with project implementation. The mitigation measures included in the Final EIR as certified by the City and included in the Mitigation Monitoring Program as adopted by the City serve that function. The Mitigation Monitoring Program includes all the mitigation measures identified in the Final EIR and has been designed to ensure compliance during implementation of the Project. In accordance with CEQA, the Mitigation Monitoring Program provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of Public Resources Code section 21081.6, the City hereby adopts the Mitigation Monitoring Program.

6. In accordance with the requirements of Public Resources Code section 21081.6, the City hereby adopts each of the mitigation measures expressly set forth herein as conditions of approval for the Project.

7. The custodian of the documents or other materials which constitute the record of proceedings upon which the City's decision is based is the Department of City Planning, City of Los Angeles.

8. The City finds and declares that substantial evidence for each and every finding made herein is contained in the Final EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.

9. The citations provided as references in the Final and Draft EIR for each impact area discussed in these Findings are for reference purposes only and are not intended to represent an exhaustive listing of all evidence that supports these Findings.

10. The City is certifying the EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the Final EIR. It is contemplated that there may be a variety of actions undertaken by other State and local agencies (who might be referred to as "responsible agencies" under CEQA). Because the City is the lead agency for the Project, the Final EIR is intended to be the basis for compliance with CEQA for each of the possible discretionary actions by other State and local agencies to carry out the Project.

7.0 CONSIDERATION AND APPROVAL OF THE FINAL EIR

Pursuant to Article 7 of the CEQA Guidelines, these Findings have been prepared for the consideration and approval of the Final EIR and the analysis contained herein. The Final EIR was completed in accordance with CEQA; and the decision-making body has reviewed and considered the information contained in the Final EIR prior to the action. Since Alternative 4 (as well as the Proposed Project) will result in a significant and unavoidable impact related to traffic, a Statement of Overriding Considerations will be required.

8.0 STATEMENT OF OVERRIDING CONSIDERATIONS

The Final EIR for the Project has identified an unavoidable and significant impact that will result from implementation of the Project as well as Alternative 4. Section 21081 of the Public Resources Code and Section 15093(b) of the CEQA Guidelines provide that when a public agency's decision allows the occurrence of a significant impact identified in a Final EIR that is not at least substantially mitigated to an insignificant level or eliminated, the lead agency must state in writing the reasons to support its action based on the completed EIR and/or other information in the record. Article I of the City of Los Angeles CEQA Guidelines incorporates all of the State CEQA Guidelines contained in title 15, California Code of Regulations, sections 15000 et seq., and hereby requires, pursuant to CEQA Guidelines Section 15093(b) that the decision-maker adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that significant adverse environmental effects have been identified in the Final EIR that cannot be substantially mitigated to an insignificant level or be eliminated. These Findings and the Statement of Considerations are based on the record of proceedings, including, but not limited to, the Final EIR, and other documents and materials that constitute the record of proceedings.

The following impact of the Project and Alternative 4 cannot be mitigated to less than significant levels with incorporation of all feasible mitigation measures:

Traffic
The Project's cumulative traffic impacts for the Future Year 2020 Plus Project conditions in conjunction with the Related Projects would be significant and unavoidable at the intersection of Santa Fe Avenue and 7th Street. The same significant impact would occur with the implementation of Alternative 4.

Accordingly, the City adopts this Statement of Overriding Considerations. Having (i) adopted all feasible mitigation measures; (ii) rejected as infeasible Alternative 1, and determined that

Alternatives 2, 3 and 5 would not meet the Project objectives to the same degree, as discussed above; (iii) recognized the significant and unavoidable impact; and (iv) balanced the benefits of Alternative 4 against its significant and unavoidable impact, the City hereby finds that the benefits outweigh and override the significant unavoidable impacts for the reasons stated below.

The below stated reasons summarize the benefits, goals, and objectives of Alternative 4 and provide the rationale for the benefits of Alternative 4. Any one of the overriding considerations of economic, social, aesthetic and environmental benefits listed below would be sufficient to outweigh the adverse environmental impacts of Alternative 4 and justify its approval.

1. Implementation of Alternative 4 will redevelop a currently underutilized, industrial site in a Transit Priority Area into a mixed-use development that combines complementary uses, such as community retail, office, and residential uses.

2. Implementation of Alternative 4 will create affordable housing units.

3. Implementation of Alternative 4 will further local and regional objectives of reducing vehicle miles traveled and greenhouse gas emissions by providing a mix of uses and increased density in close proximity to existing bus and transit systems.

4. Implementation of Alternative 4 will encourage pedestrian and bicycle activity by providing bicycle parking and pedestrian linkages within the Project.

5. Implementation of Alternative 4 will improve the aesthetic quality of the site by removing older structures and developing new efficient buildings that are more sensitive to adjacent uses.

6. Implementation of Alternative 4 will incorporate sustainable and green building design and construction to promote resource conservation, including waste reduction, efficient water management techniques, and conservation of electricity and energy.

7. During Alternative 4's construction phase, planned construction would generate on-site, full-time jobs. At full development, business activities generated will generate permanent full-time jobs.

8. Implementation of Alternative 4 would increase the amount of annual tax revenue generated by the Project Site.

9. Implementation of Alternative 4 will generate construction-related one-time revenues to the City.

10. Provide a reasonably significant amount of housing along a major public transportation corridor in furtherance of City's goals and policies and in close proximity to a Gold Line Station.

V. LESS THAN SIGNIFICANT IMPACTS WITH MITIGATION

The EIR determined that the Project has potentially significant environmental impacts in the areas discussed below. The EIR identified feasible mitigation measures to avoid or substantially reduce the environmental impacts in these areas to a level of less than significant. Based on the information and analysis set forth in the EIR, the Project would not have any significant environmental impacts in these areas, as long as all identified feasible mitigation measures are

incorporated into the Project. The City again ratifies, adopts, and incorporates the full analysis, explanation, findings, responses to comments, and conclusions of the EIR.

Air Quality

Description of Effects

Construction Phase Impacts – Local Impacts

At a local level, construction of the Project and Alternative 4 could produce emissions that potentially impact air quality near the Project Site. To assess the air quality impact of localized construction emissions of PM2.5, PM10, CO, and NO2, the SCAQMD's recommended LST methodologies were used. Neither Alternative 4 nor the Project would produce significant emissions that exceed the SCAQMD's recommended localized standards of significance for the criteria pollutants, with the exception of PM10 and PM2.5, the impacts of which can be reduced to less than significant levels through regulatory compliance and implementation of mitigation.

Cumulative Impacts

Both Alternative 4 and the Proposed Project would produce construction emissions that contribute to cumulative emissions in the local vicinity during the construction period. Other projects that are scheduled for construction during that time could also contribute to cumulative impacts. There are 11 potential construction projects within one-third mile of the Project Site that could produce construction impacts that, in combination with the Proposed Project or Alternative 4, could contribute to cumulative air quality impacts. However, even if construction activities at these 11 sites were to occur simultaneously with the development of the Proposed Project or Alternative 4, cumulative local air quality impacts are expected to be less than significance because the thresholds are designed to ensure that a development project does not contribute to localized exceedances of CO, NOx, PM10, or PM2.5 concentrations.

With respect to operation, the Project and Alternative 4 could contribute to two types of cumulative impacts on local air quality. First, the Project and Alternative 4 would generate minimal on-site emissions of localized pollutants (PM2.5, PM10, and NOx) from area and energy sources that are typical of residential and commercial development in the area. However, the cumulative development of other projects in the area would produce similar area and energy source emissions that would not result in localized exceedances of ambient air quality standards. Second, the long-term operation of the Project or Alternative 4 with the 183 other cumulative projects could contribute to cumulative, localized air quality impacts that are considered to be less than significant.

The Project and Alternative 4 would also be consistent with assumption in the SCAQMD's 2016 Air Quality Management Plan, and would be consistent the City's General Plan Air Quality Element. Impacts would be less than significant.

Mitigation Measure

AIR-MM-1 – During site preparation activities, limit simultaneous operation of off-road equipment to no more than five pieces of equipment.

The Mitigation Measure also applies to Alternative 4.

Finding

With respect to the potential impacts regarding air quality construction-phase local impacts and cumulative impacts associated with the Project and Alternative 4, each decision-making body of the City adopts the first possible finding as outline above in Section III, which states that

"changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (CEQA Guidelines Section 15091(a)(1)).

Rationale for Finding

With respect to the construction phase, compliance with existing SCAQMD regulations would substantially reduce localized emissions of particulates from fugitive dust sources, including for the nearby Molino residential lofts and other developments on local streets. These are required by SCAQMD Rule 403, which calls for the application of best available control measures to all construction activities. Compliance with Rule 403 would reduce PM2.5 and PM10 emissions associated with construction activities by approximately 61 percent. In addition, Mitigation Measure AIR-MM-1 would mitigate localized emissions of PM2.5 and PM10. The air quality analysis throughout the Draft EIR was conducted consistent with applicable SCAQMD guidance and CalEEMod, including the CalEEMod User's Guide. Through regulatory compliance and implementation of Mitigation Measure AIR-MM-1, both Alternative 4's and the Project's localized emissions of PM2.5 and PM10 during the construction phase would be reduced below the SCAQMD's applicable thresholds. Therefore, impacts would be reduced to a less than significant level.

With respect to the cumulative construction scenario, even if nearby projects were to be constructed simultaneously with the Project or Alternative 4, impacts would be less than significant for at least four reasons. First, each construction site would be required to meet SCAQMD's applicable LST thresholds at nearby sensitive receptors, which are designed to ensure that a development project does not contribute to localized exceedances of CO, NOx, PM10, or PM2.5 concentrations. Second, CO hotspots are not expected from cumulative growth in the Project area as described in Section 4.C, Air Quality, of the Draft EIR. Third, neither Alternative 4 nor the Project would exceed the LST thresholds set by the SCAQMD for PM emissions. Fourth, future development that contributes to cumulative growth would be required to address LST thresholds and perform dispersion modeling if potential violations of health standards were to occur. For these reasons, neither Alternative 4's nor the Project's contribution to cumulative construction air quality impacts would be significant.

With respect to long-term cumulative operational impacts, neither the Project nor Alternative 4 in conjunction with nearby development projects would cause significant impacts, since they would generate only minimal on-site emissions of localized pollutants, and since they would not cause exceedances of CO air quality standards at roadways in the area, as described in Section 4.C, Air Quality, of the Draft EIR.

With respect to cumulative regional air emissions, since both the Project and Alternative 4 would create emissions beneath applicable SCAQMD regional emissions thresholds, they are not considered to have a significant cumulative contribution to regional air quality impacts. Thus, cumulative regional impacts are also less than significant.

Further, in the South Coast Air Basin, per SCAQMD guidance, cumulative impacts on regional ozone air quality are judged by a project's consistency with the SCAQMD's 2016 Air Quality Management Plan (AQMP). The proposed live/work, office, and commercial land uses will neither conflict with the SCAQMD's 2016 Air Quality Management Plan (AQMP) nor jeopardize the region's attainment of air quality standards. The regional ozone attainment plan centers on accommodating population growth forecasts by the Southern California Association of Governments (SCAG). Specifically, SCAG's growth forecasts from the 2016 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are largely built off local growth forecasts from local governments like the City of Los Angeles. The RTP/SCS accommodates up to 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs in the City

of Los Angeles by 2040. The population associated with either the Project or Alternative 4 would be less than 1 percent of projected population growth and less than 1 percent of household growth in the City of Los Angeles through 2040. As such, the Project and Alternative 4 would not conflict with the growth assumptions for the City in the AQMP. This impact is considered less than significant.

Finally, with respect to the City's Air Quality Element (which relies on SCAQMD guidance and requirements in this area to determine the significance of development on air quality), based on the above analysis, through compliance with SCAQMD regulations and with implementation of Mitigation Measure AIR-MM-1, the Proposed Project and Alternative 4 would be consistent with the City's General Plan Air Quality Element and would not contribute to a cumulatively significant impact on air quality.

With implementation of Mitigation Measure AIR-MM-1 and through compliance with applicable regulations, the Project's and Alternative 4's air quality impacts would be less than significant.

Reference

For a complete discussion of the Project's impacts associated with air quality, see Section 4.C, Air Quality, of the Draft EIR. For a complete discussion of Alternative 4's impacts, see Section 6, Alternatives, of the Draft EIR. See also Section II, Responses to Comments, of the Final EIR.

Geology and Soils

Description of Effects

Expansive Soils

The on-site geologic materials examined from the test borings are in the very low to low expansion range. Such soils are not subject to measures to mitigate expansive soils. However, given that test borings in portions of the site were not able to be drilled due to the presence of the existing building, additional expansion tests must be performed when the excavation work is nearing completion in order to determine the expansion potential of the soils exposed near the final grade. Thus, the Project's and Alternative 4's impacts with respect to expansive soils are potentially significant. With implementation of Mitigation Measure GEO-MM-1, impacts would be reduced to less than significant.

Mitigation Measure

GEO-MM-1 – The Project shall comply with the recommendations found on pages 6 through 23 of the Report of Geotechnical Investigation, R.T. Frankian & Associates, September 25, 2014 (included as Appendix H to the Draft EIR), to the satisfaction of the Bureau of Engineering.

The Mitigation Measure also applies to Alternative 4.

Finding

With respect to the Project's and Alternative 4's potential impacts regarding expansive soils, each decision-making body of the City adopts the first possible finding as outlined above in Section III, which states that "changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (CEQA Guidelines Section 15091(a)(1)).

Rationale for Finding

Both Alternative 4 and the Project have potential for significant impacts with respect to expansive soils. However, with incorporation of Mitigation Measures GEO-MM-1, impacts would

be less than significant. Mitigation Measure GEO-MM-1 would ensure that the Project and Alternative 4 are feasible from a geotechnical engineering standpoint with respect to soil expansion and stability. With implementation of Mitigation Measure GEO-MM-1, potential impacts of the Project and Alternative 4 relating to expansive soils would be reduced to a less than significant level.

Reference

For a complete discussion of the Project's impacts associated with expansive soils, see Section 4.D, Geology and Soils, of the Draft EIR. For a complete discussion of Alternative 4's impacts, see Section 6, Alternatives, of the Draft EIR.

Hazards and Hazardous Materials

Description of Effects

Soil Contamination

A Phase I Environmental Site Assessment and limited Phase II assessment were conducted for the Project site (see Appendices I-1 and I-2 of the Draft EIR). The results of those assessments are described in Section 4.F, Hazards and Hazardous Materials, of the Draft EIR. As described therein, and in Section 2, Responses to Comments, of the Final EIR, soil contaminant levels are below applicable state and federal limits across the majority of the Project site, with only one sample taken showing elevated levels of lead and arsenic above applicable regulatory limits. Based upon the available data, the soil contaminants on-site appear to be limited to a specific area of the property and do not appear to constitute a threat for off-site migration. However, the presence of that contamination at that area represents a potentially significant impact if not remedied. With incorporation of Mitigation Measures HAZ-MM-1, impacts would be less than significant for the Project and Alternative 4.

Mitigation Measure

HAZ-MM-1 – Following demolition of the existing structures and removal of the debris from the Project Site, a full Phase II Environmental Site Assessment of the Project Site shall be performed. If soil and/or groundwater contamination is encountered, a detailed Soil Management Plan for the segregation of contaminated soils and materials shall be developed and implemented in accordance with applicable laws and regulations. The Soil Management Plan shall be submitted to the Department of Building and Safety Grading Division for approval prior to the issuance of a grading permit.

Alternative 4 will comply with this Mitigation Measure.

Finding

With respect to the Project's and Alternative 4's potential impacts regarding soil contamination, each decision-making body of the City adopts the first possible finding as outlined above in Section III, which states that "changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (CEQA Guidelines Section 15091(a)(1)).

Rationale for Finding

Erring on the conservative side a Phase II assessment will be required following demolition of the existing structure in order to fully characterize soil quality and the extent of soil contamination. In order to ensure that potential impacts associated with excavation and grading are reduced to a less than significant level, Mitigation Measure HAZ-MM-1 requires a complete Phase II ESA to be performed to fully characterize the soils beneath the site following the

demolition of the existing structure on-site and prior to the commencement of soil removal activities, and the implementation of all soil remediation and/or disposal recommendations contained within the complete Phase II report. As part of this required mitigation, if soil containing contaminants above regulatory levels are found to exist, a detailed Soil Management Plan must be developed for review and approval by the City. This Plan will specify procedures for segregating contaminated materials and removing the contaminated materials from the site to proper disposal or remediation facilities in accordance with applicable regulations, thus ensuring that offsite migration of contaminated materials does not occur. The Project site does not directly discharge to the Los Angeles River (or any other water body) and potential soil contamination impacts on water bodies are less than significant for that reason as well.

Mitigation Measure HAZ-MM-1 is being required as a cautionary step to ensure that the soil is remediated prior to construction of the Proposed Project. Any remediation work would be governed by established law and regulation, which provide the pertinent standards and thresholds to ensure that implementation of Mitigation Measure HAZ-MM-1 will reduce impacts below significance. To ensure compliance, the City has conditioned the grading permit on compliance with this mitigation. Thus, with implementation of Mitigation Measure HAZ-MM-1, all impacts related to soil contamination from the Project would be less than significant. Since Alternative 4 proposes to develop the same site, with incorporation of Mitigation Measure HAZ-MM-1, impacts would also be less than significant.

Reference

For a complete discussion of the Project's impacts associated with soil contamination, see Section 4.F, Hazards and Hazardous Materials, of the Draft EIR, and Appendices I-1 and I-2 attached thereto. For a complete discussion of Alternative 4's impacts, see Section 6, Alternatives, of the Draft EIR. See also Section 2, Responses to Comments, of the Final EIR.

Noise

Description of Effects

Construction Noise

Construction activity would result in temporary increases in ambient noise levels in the Project area on an intermittent basis. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers. Construction activities for either Alternative 4 or the Proposed Project would occur between the hours of 7:00 AM and 9:00 PM in accordance with the City of Los Angeles Municipal Code. Construction noise levels could exceed 75 dBA at two of the four monitored sites, with ambient noise level increases of 5 dBA for more than 10 days in a 3-month period, as well as an increase of 10 dBA at some of the sensitive receptors. The greatest impact would occur at the 544 Mateo Street location. Therefore, construction noise impacts would be considered significant prior to the implementation of mitigation. However, Mitigation Measures NOI-MM-1 through NOI-MM-9 would reduce the Project's and Alternative 4's construction noise impact to a less than significant level.

Cumulative Impacts

Both the Proposed Project and Alternative 4 would produce construction-related noise that contributes to cumulative noise in the local vicinity during the construction period. Other projects that are scheduled for construction during that time could also contribute to cumulative impacts. There are three cumulative development projects located within 500 feet of the Project Site:

555 S. Mateo Street (At Mateo). Development with 153,000 square feet of retail space and 50,000 square feet of office approximately 50 feet southwest of the Project Site.

540 S. Santa Fe Avenue. Office development consisting of 65,812 square feet approximately 200 feet southeast of the Project Site.

500 S. Mateo Street. Restaurant containing 12,882 square feet approximately 50 feet north of the Project Site.

Concurrent construction of the three cumulative projects and the Proposed Project, if unmitigated, could potentially create a significant cumulative impact at the sensitive receptors located at 544 Mateo Street and the Barker Block Lofts. However, Mitigation Measures NOI-MM-1 through NOI-MM-9 would reduce the Project's and Alternative 4's construction noise impact to a less than significant level. Implementation of Mitigation Measures NOI-MM-1 through NOI-MM-7 would also reduce the Project's and Alternative 4's respective contribution to any potential cumulative construction impacts. With the incorporation of these measures, cumulative construction noise impacts for the Project and Alternative 4 would be less than significant.

Mitigation Measures

Mitigation Measures NOI-MM-1 through NOI-MM-9 would reduce the Project's and Alternative 4's construction noise impact to a less than significant level. Implementation of Mitigation Measures NOI-MM-1 through NOI-MM-7 would also reduce the Project's and Alternative 4's respective contribution to any potential cumulative construction impacts.

NOI-MM-1 – The construction staging area shall be located as far from sensitive receptors, particularly the Molino Lofts and Barker Block residences, as possible.

NOI-MM-2 – Temporary sound barriers, capable of achieving a sound attenuation of at least 10 dBA (e.g., construction sound wall or sound blankets), and capable of blocking the line-of-sight between the adjacent sensitive receptors, shall be installed. If the At Mateo project, 540 S. Santa Fe project, and/or the 500 S. Mateo project performs mass grading at its site at the same time as the Proposed Project, temporary sound barriers shall achieve attenuation of at least 15 dBA at the Project Site.

NOI-MM-3 – Power construction equipment (including combustion engines), fixed or mobile, shall be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards), including solar and electric options. All equipment shall be properly maintained to assure that no additional noise due to worn or improperly maintained parts would be generated.

NOI-MM-4 – Two weeks prior to the commencement of construction, notification shall be provided to the immediate surrounding off-site residential and noise-sensitive commercial uses that discloses the construction schedule, including the types of activities and equipment that would be occurring/operating throughout the duration of the construction period.

NOI-MM-5 – Equipment warm-up areas, water tanks, and equipment storage areas shall be located a minimum of 50 feet from abutting sensitive receptors.

NOI-MM-6 – Construction haul trucks shall avoid accessing residential streets. Haul trucks shall enter and exit the Project Site via Santa Fe Avenue.

NOI-MM-7 – Construction workers shall park at designated locations and shall be prohibited from parking on nearby residential streets.

NOI-MM-8 – A noise disturbance coordinator shall be established to respond to local complaints about *construction* noise. The disturbance coordinator shall determine the cause of the noise complaints and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs, legible at a distance of 50 feet, at the construction site shall list the telephone number for the disturbance coordinator.

NOI-MM-9 – All residential units located within 2,000 feet of the construction site shall be sent a notice informing the residences of the construction schedule of the Proposed Project. A sign shall also be posted at the construction site notifying residences of construction activities. All notices and signs shall display the dates of construction activities, as well as provide a telephone number where residents can contact the noise disturbance coordinator about the construction process and register complaints.

Alternative 4 would be required to comply with these same Mitigation Measures.

Finding

With respect to the Project's and Alternative 4's potential impacts regarding noise, each decision-making body of the City adopts the first possible finding as outline above in Section III, which states that "changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (CEQA Guidelines Section 15091(a)(1)).

Rationale for Finding

Both the Project's and Alternative 4's construction-related activities, although temporary, would potentially expose sensitive receptors or the surrounding area to noise levels in excess of the City's CEQA thresholds of significance. With incorporation of Mitigation Measures NOI-MM-1 through NOI-MM-9, impacts would be less than significant. Mitigation Measure NOI-MM-2, for example, would install sound walls capable of reducing temporary construction noise levels at off-site receptors by at least 10 dBA. Mitigation Measure NOI-MM-3 would ensure that powered construction equipment are properly outfitted with exhaust mufflers and other noise-reduction devices. Other mitigation measures would further reduce the Project's construction noise impact. Since the Proposed Project or Alternative 4 could lead to impacts associated with noise in excess of applicable standards, the Mitigation Measure NOI-MM-1 through NOI-MM-9 shall be required to reduce those associated impacts to a less than significant level.

With respect to cumulative impacts, construction of the Proposed Project and Alternative 4 would significantly elevate noise levels at the Molino Lofts and the 544 Mateo Street media facility during the grading portion of the construction process. These impacts would be greatest where they front the Proposed Project site. Concurrent construction of the three cumulative projects nearby the Project Site, if it were to occur, would also impact noise levels at the Molino Lofts, though impacts would be greatest on different frontages for these receptors, given the locations of the three other projects. As such, both Alternative 4 and the Project would need to implement source-reduction measures, such as Mitigation Measures NOI-MM-1 through NOI-MM-7 that call for the use of noise mufflers on off-road equipment and the erection of temporary sound barriers. Even so, the immediate proximity of the potential construction sites to the Molino Lofts and the 544 Mateo Street site would still produce cumulative noise increases exceeding 5 dBA at both receptor locations, even after mitigation, if construction of the three projects were to proceed simultaneously. If the At Mateo project and/or 500 S. Mateo Street project were to conduct grading and earthmoving work at the same time as the Proposed Project, an additional 5 dBA of reduction from temporary sound barriers would be needed to ensure there are no significant noise increases at local sensitive receptors. Mitigation Measure NOI-MM-2, requiring

the installation of temporary sound barriers capable of achieving a sound attenuation of at least 10 dBA (and at least 15 dBA in the event that Project grading and earthmoving occurs at the same time as that of the At Mateo project) would ensure that local receptors are protected from significant noise increases in either construction scenario. With implementation of this mitigation, cumulative impacts would be reduced to a less than significant level for the Project and Alternative 4.

Construction activities beyond a distance of 500 feet are unlikely to create any incremental impacts on any of the receptors analyzed in this study for two reasons. First, the logarithmic relationship between distance and sound waves makes the potential for audible increases in ambient noise beyond 500 feet unlikely. Second, there are many intervening structures between the more distant cumulative projects and any sensitive receptors related to the Proposed Project and Alternative 4. Each structure would further block the sound path to any of the receptors and significantly attenuate noise. Because this noise would not be audible at any of the sensitive receptors, this cumulative impact is considered less than significant.

The majority of the Project's long-term noise impact would result from vehicular traffic traveling to and from the Project. Thus, the addition of future traffic from any new developments in the Project area, as well as overall ambient traffic growth, would elevate ambient noise levels surrounding local roadways. However, the Project's and Alternative 4's respective contribution to permanent cumulative off-site ambient noise level increases would be marginal, specifically, less than 3 dBA (i.e., within their respective "normally unacceptable" or "clearly unacceptable" noise categories), or by 5 dBA or greater, with or without the addition of Project traffic. As a result, the Project's and Alternative 4's respective long-term and cumulative operational noise impacts would be considered less than significant.

The predominant vibration source near the Project Site is heavy trucks traveling on the local roadways. The Project and Alternative 4 could generate vibration from heavy haul trucks traveling on local roadways, though this impact would not be considered significant as the volume of such truck traffic would be minimal and on-road truck vibration is not typically perceptible. As also discussed earlier, three other development projects have been proposed for locations within 500 feet of the Project. Construction activities at the 555 S. Mateo Street project, the 540 S. Santa Fe Avenue project, and the 500 S. Mateo Street project would also be expected to generate haul trips on local roads. However, it is not expected that these haul trips, in addition to the Project's haul trips, would cause a substantial cumulative increase in haul truck trips and related vibrations for the following reasons. The 555 S. Mateo Street project is expected to have balanced cut and fill, and would therefore not require a considerable number of haul trips to export excavated or graded materials. The 540 S. Santa Fe Avenue has completed its major grading and demolition phases. Further building construction work would not require a substantial number of haul trips. Lastly, the 500 S. Mateo Street project proposes to renovate and reuse an existing office building, which would not require extensive demolition and grading activities that necessitate the mass export of debris and soils. The Proposed Project's and Alternative 4's respective contribution to cumulative vibration in the vicinity of the Project would thus be considered less than significant.

Mitigation Measures NOI-MM-1 through NOI-MM-9 would reduce the Project's and Alternative 4's construction noise impact to a less than significant level. Implementation of Mitigation Measures NOI-MM-1 through NOI-MM-7 would also reduce the Project's and Alternative 4's respective contribution to any potential cumulative construction impacts. With the incorporation of these measures, cumulative construction noise impacts would be less than significant.

Reference

For a complete discussion of the Project's impacts associated with noise, see Section 4.I, Noise, of the Draft EIR. For a complete discussion of Alternative 4's impacts, see Section 6, Alternatives, of the Draft EIR.

Public Services – Police Services

Description of Effects

Construction

Construction sites could be sources of attractive nuisances, providing hazards and inviting theft and vandalism that could result in an increase in demand for police protection services. The Project Site is generally open to access except on the south side, where it is shielded by existing adjacent buildings. Given the ease of potential illicit access during the construction period, the Site would need to be secured during construction in order to avoid a potentially significant impact. Although minor traffic delays due to temporary lane closures needed to facilitate specific construction activities could occur, particularly during the construction of utilities and street improvements, impacts to police response times are considered to be less than significant. With the Project Design Features and incorporation of the Mitigation Measures, impacts from the Project and Alternative 4 would be less than significant.

Operation

Both Alternative 4 and the Project would generate new residents, visitors, and employees, and would also increase the amount of developed square footage on the Project Site. The LAPD does not maintain minimum officer-to-resident population ratio objectives, however, the data can serve as a useful metric to gauge the effect of a proposed project on service levels and response times. The Project's additional 1,662 residents would require approximately 11 additional officers to maintain the current ratio. The demand for 11 additional officers to maintain current resident service ratios would not require the expansion, consolidation, or relocation of this station. Alternative 4 would generate fewer residents since fewer live/work units would be developed. Therefore, no expansion, consolidation, or relocation of this station would be necessary.

To address the potential additional crime in the Project area due to the population growth and the employee increase in daytime population, the Project and Alternative 4 would include security features within the parking facilities and along exterior building areas and the north and south paseo areas, such as appropriate lighting and gated access to the private areas of the Project. No additional mitigation measures are required, as no significant impacts associated with police services have been identified. However, compliance with Mitigation Measure POL-MM-3 and Project Design Feature POL-PDF-2 shall ensure that the Project's and Alternative 4's impacts to police services will remain less than significant.

Project Design Features

POL-PDF-1 – Emergency access shall be maintained to the Project Site during construction through marked emergency access points approved by the LAPD.

POL-PDF-2 – The Project shall provide for on-site security measures and controlled access systems for residents and tenants to minimize the demand for police protection services. These measures include, but are not limited to, the following:

- Perimeter lighting to supplement the street lighting and to provide increased visibility and security;

- On-site security personnel, commensurate to similar/comparable residential and retail projects of its size, as needed;
- Parking Garage Access Control; and
- Residential Units Access Control.

Mitigation Measures

POL-MM-1 – Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

The perimeter fence shall have gates installed to facilitate the ingress and egress of equipment and the work force. The bottom of the fence, when necessary, shall have filter fabric to prevent silt run off. Straw hay bales shall be utilized around catch basins when located within the construction zone. The perimeter and silt fence shall be maintained while in place. Where applicable, the construction fence shall be incorporated with a pedestrian walkway. Temporary lighting shall be installed and maintained at the pedestrian walkway. Should sections of the site fence have to be removed to facilitate work in process, barriers and or K-rail shall be utilized to isolate and protect the public from unsafe conditions.

POL-MM-2 – The Project Applicant shall provide for the deployment of a private security guard to monitor and patrol the Sites, appropriate to the phase of construction throughout the construction period. The patrol shall be deployed at times that are typical within the local-area construction industry for a Project of this size.

POL-MM-3 – The Project Applicant shall provide the LAPD with a diagram of each portion of the Project Site, showing access routes and additional access information as requested by the LAPD, to facilitate police response.

Alternative 4 would comply with these same mitigation measures and project design features.

Finding

With respect to the Project's and Alternative 4's potential impacts regarding the police services, each decision-making body of the City adopts the first possible finding as outline above in Section III, which states that "changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (CEQA Guidelines Section 15091(a)(1)).

Rationale for Finding

During the construction phase, both the Project and Alternative 4 could result in adverse physical impacts associated with the provision of new or physically altered police protection facilities in order to maintain acceptable service rations, response times, or other performance objectives. However, incorporation of mitigation Measures POL-MM-1 and POL-MM-2 would reduce those impacts to less than significant levels. The impact would be less than significant for the Project and Alternative 4.

Fencing and other security features, as necessary, would be provided at the Project Site during construction under Mitigation Measures POL-MM-1 and POL-MM-2. Security measures would ensure that valuable materials (e.g., building supplies and metals such as copper wiring), as well as construction equipment are not easily stolen or abused. This is especially important since the Project Site is located at the intersection of multiple streets which have an active

walking and/or driving environment. While there is the potential for the construction to create an increase in demand for police protection services, the Project would provide security on the Project Site as needed and appropriate during the phases and course of the construction process. This security would include perimeter fencing, lighting, and security guards, thereby reducing the demand for LAPD services. These security features are listed as Mitigation Measures POL-MM-1 and POL-MM-2. The specific type and combination of construction site security features would depend on the phase of construction. Therefore, with implementation of these security features, construction impacts as they relate to increased on-site demand for police services during construction would be less than significant.

Construction of the Project or Alternative 4 would not be expected to affect the LAPD's ability to respond to emergencies to the extent that there would be a need for any additional new or expanded police facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the LAPD. Thus, construction-related impacts to police protection services would be less than significant with the implementation of Mitigation Measures POL-MM-1 and POL-MM-2. Alternative 4 would have similar impacts, which would also be less than significant with implementation of mitigation.

Since the Proposed Project's or Alternative 4's construction could impact on police protection services, the following mitigation measures POL-MM-1 and POL-MM-2 shall be required to reduce those impacts to a less than significant level. Project Design Feature POL-PDF-1 shall also be required to ensure construction impacts related to police protection services remain less than significant.

The Proposed Project's operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities in order to maintain acceptable service rations, response times, or other performance objectives. Implementation of Project Design Feature POL-PDF-2 would ensure the Project's operational impacts related to police protection remain less than significant. Impacts would be less than significant. Alternative 4 would have similar impacts and would be less than significant with implementation of mitigation.

By providing natural surveillance (visibility from streets and sidewalks) and natural access control (landscaping buffers and other distinctions between public and private spaces), both Alternative 4 and the Project can be designed to reduce crime. Both Alternative 4 and the Project would have defensible spaces designed to reduce opportunity crimes and ensure safety and security. In addition, the lighting and landscaping design would ensure high visibility, and the Project would provide for on-site security measures and controlled access systems for residents and tenants to minimize the demand for police protection services. Both Alternative 4 and the Project would incorporate crime prevention features into the design of the buildings and public spaces, such as lighting of entryways and public areas. Through Project Design Feature POL-PDF-2, the Project and Alternative 4 would incorporate crime prevention features into the design. The Project Applicant would also provide the LAPD with a diagram of each portion of the Project Site, showing access routes and additional access information as requested by the LAPD to facilitate police response. Emergency access to the Project Site would be provided by the existing street system.

Neither Alternative 4 nor the Project would also conflict with, or impede implementation of, any of the policies or goals related to police protection described in the Framework Element of the City's General Plan or the Central City North Community Plan, which describe planning of facilities. Additionally, the Project would contribute to the City's General Fund through the generation of revenue, which would help LAPD achieve progress toward its goal to ensure adequate police facilities and protective services for existing and future population and land uses.

Overall, neither Alternative 4 nor the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for police protection. Due to the Project's direct population increase and associated demand for police protection services, as well as its construction phase, there would be a potential impact on police protection services. Therefore, to reduce the Project's potential impacts on police protection services to less than significant levels, a combination of project design features and mitigation measures described below and above would be required. Alternative 4's impacts would be substantially similar and less than significant with implantation of mitigation and project design features.

Reference

For a complete discussion of the Project's impacts associated with police services, see Section 4.K.2, Public Services – Police Protection, of the Draft EIR. For a complete discussion of Alternative 4's impacts, see Section 6, Alternatives, of the Draft EIR.

Transportation and Traffic

Description of Effects

Project Ramp Queue Impacts

An analysis of Caltrans facilities, including freeway mainline segments, Caltrans intersections, and off-ramp queuing was performed. The Project exceeds the screening thresholds identified in the Caltrans Agreement at the freeway off-ramps. Thus, further analyses of Caltrans facilities were conducted. Caltrans does not identify specific incremental criteria by which to measure the significance of impacts to freeway mainline segments or intersections with ramp termini and, therefore, it is not possible to identify whether a specific facility would be significantly impacted under Caltrans criteria. Mitigation Measure TR-MM-3, requiring the Project Applicant to contribute its fair share toward off-ramp improvements to increase the storage length on the three off-ramps where capacities are projected to be exceeded, would reduce the Project's ramp queuing impact to a less than significant level. With implementation of this same mitigation, Alternative 4's impacts would also be reduced to less than significant levels.

Construction

The City's CEQA Thresholds Guide identifies four types of in-street construction impacts, including: (1) temporary traffic impacts – potential impacts on vehicular travelers on roadways; (2) temporary loss of access – potential impacts on visitors entering and leaving sites; (3) temporary loss of bus stops or rerouting of bus lines – potential impacts on bus travelers; (4) temporary loss of on-street parking – potential impacts on parkers. Traffic impacts from construction activities could occur as a result of the following types of activities: (i) increases in truck traffic associated with export of fill materials and delivery of construction materials; (ii) increases in automobile traffic associated with construction workers traveling to and from the site; (iii) reductions in existing street capacity or on-street parking from temporary lane closures necessary for the construction of roadway improvements, utility relocation, and drainage facilities; and (iv) blocking existing vehicle or pedestrian access to other parcels fronting street.

Grading Component

The peak period of truck activity during construction would occur during excavation and grading of the Project Site. Based on projections compiled for both Alternative 4 and the Project,

approximately 105,000 cubic yards (CY) of material would be excavated and removed from the Project Site over this 40-workday period. That equates to approximately 2,625 CY of material exported each workday, requiring 188 haul trucks per work day based on an anticipated haul truck capacity of 14 CY each. Thus, up to 376 daily truck trips (188 inbound, 188 outbound) are forecast to occur during the excavation and grading period, with approximately 48 trips per hour (24 inbound, 24 outbound) uniformly over a typical eight-hour workday.NOx

Construction Component

Construction activities are planned over a 21-month period and include a maximum of 200 employees per day. 200 workers would result in a total of 176 vehicles that would arrive and depart from the Project Site each day. The estimated number of daily trips associated with the construction workers is approximately 152 (176 inbound and 176 outbound trips), but nearly all of those trips would occur outside of the peak hours, as described above.

The use of the public right-of-way along Mateo Street and Santa Fe Avenue would require temporary rerouting of pedestrian traffic as the sidewalks fronting the Project Site would be closed. The Construction Management Plan would include measures to ensure pedestrian safety along the affected sidewalks and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering).

Since the construction of either Alternative 4 or the Project could temporarily cause potentially short-term significant impacts, a Construction Management Plan shall be required to ensure construction impacts related to traffic remain less than significant. With incorporation of the following Construction Management Plan for Alternative 4 or the Project, impacts will be less than significant.

Mitigation Measure

TR-MM-3 – The Applicant shall consult with Caltrans in order to determine and provide its fair share contribution toward the funding of off-ramp improvements necessary to increase the storage length on the three off-ramps where Project-generated traffic would contribute to forecast traffic volumes in excess of available ramp storage capacities.

Alternative 4 would comply with the Mitigation Measure.

Regulatory Measure

Construction Management Plan – A detailed Construction Management Plan, including street closure information, detour plans, haul routes, and staging plans would be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and should include the following elements as appropriate:

- Advance notification of adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction.
- Prohibition of construction worker parking on adjacent residential streets.
- Temporary pedestrian and vehicular traffic controls during all construction activities adjacent to Mateo Street and Santa Fe Avenue to ensure traffic safety on public right of

ways. These controls shall include, but are not limited to, flag people trained in pedestrian and student safety.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flagmen).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Construction-related vehicles shall not park on surrounding public streets.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate, including along all identified LAUSD pedestrian routes to nearby schools.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible, and so as to not impede school drop-off and pick-up activities and students using LAUSD's identified pedestrian routes to nearby schools.
- Coordination with public transit agencies to provide advanced notifications of stop relocations and durations.
- Advanced notification of temporary parking removals and duration of removals.

Alternative 4 would comply with this regulatory measure.

Finding

With respect to the Project's and Alternative 4's potential impacts regarding the construction and project ramp queue impacts, each decision-making body of the City adopts the first possible finding as outline above in Section III, which states that "changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (CEQA Guidelines Section 15091(a)(1)).

Rationale for Finding

Project traffic would add to a projected background condition in which the queue already would extend onto the mainline lanes. Yet, improvements to Caltrans freeway facilities tend to be beyond the feasibility of any individual project to implement; therefore, Appendix B of the Caltrans TIS Guide provides a methodology to identify a project's proportionate share of the future traffic growth on the Caltrans freeways facilities. The fair share is calculated as the Project's percentage of the total projected traffic growth on a freeway mainline segment up to 2035. The Project alone would not result in significant impacts at any of the analyzed freeway mainline segments, but would contribute to the cumulative future traffic volumes. As calculated in the Draft EIR, the average of the Project's and Alternative 4's respective proportionate share of the growth on the 40 segments tested is less than 1 percent. Since the Project could contribute to cumulative off-ramp queue impacts, the Project applicant would be required to contribute its fair share of improvements to increase storage length, as set forth in Mitigation Measure TR-MM-3. Thus, as described in 4.L, Transportation – Traffic, of the Draft EIR, Caltrans has identified a methodology to determine a project's fair share percentage towards the eventual costs of improvements towards Caltrans' facilities, and the Project will contribute that fair share percentage. This mitigation is feasible and will mitigate the Project's and Alternative 4's respective impacts to off-ramp queues to less than significant levels. Therefore, the Project's and Alternative 4's impacts would be less than significant with implementation of mitigation.

The construction of either Alternative 4 or the Project could lead to potential traffic impacts during construction. However, those impacts will be temporary. With incorporation of the

Construction Management Plan impacts associated with traffic from construction of either Alternative 4 or the Project would be less than significant.

With respect to the grading component, assuming minimal carpooling amongst workers, the 20 workers would result in a total of 18 vehicle trips to and from the Project Site on a daily basis. With the implementation of the Construction Management Plan, it is anticipated that almost all haul truck activity to and from the Project Site would occur outside of the morning and afternoon peak hours. In addition, worker trips to and from the Project Site would also occur outside of the peak hours. Further, construction-related trips are anticipated to be fewer than the trips associated with the existing uses of the Project Site that would be removed from the study area during construction. Therefore, no peak hour construction traffic impacts for either Alternative 4 or the Project are expected during the excavation and grading phase of construction.

With respect to the construction component, construction-related trips are anticipated to be fewer than the trips associated with the existing uses of the Project Site that would be removed from the study area during construction. As such, the building phase of construction for either Alternative 4 or the Project is not expected to cause a significant traffic impact at any of the study intersections.

During construction, adequate parking for construction workers would be secured in the vicinity of the Project Site. Restrictions against workers parking in the public right-of-way in the vicinity of (or adjacent to) the Project Site will be identified as part of the Construction Management Plan. Construction parking may require the temporary use of off-site parking areas for materials storage and truck staging.

With respect to parking during construction, construction employees would be required to park on the Project Site and would not be allowed to park on adjacent surface streets. As part of the Construction Management Plan and in consultation with the City's Building and Safety Department, it might be determined that off-site parking and shuttling of construction employees would be a better option for getting construction employees to and from the Project Site. Under either parking option, Alternative 4's and the Project's respective impacts related to traffic construction will remain less than significant.

There are no bus stops adjacent to the Project Site and, therefore, no temporary impacts to transit are expected. Parking is allowed adjacent to the Project Site on Mateo Street so the construction fences could result in the temporary loss of up to six unmetered parking spaces.

Construction of either Alternative 4 or the Project is not expected to create hazards for roadway travelers, bus riders, or parkers, so long as commonly practiced safety procedures for construction are followed. Such procedures and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, etc.) are incorporated into the Construction Management Plan. The construction-related impacts associated with access and transit are anticipated to be less than significant, and the implementation of the Construction Management Plan described below would further reduce those impacts.

With respect to cumulative impacts, any possible overlap of construction, and impacts attributable to construction traffic from concurrent construction, would be addressed through the City's ongoing Construction Management Plans, which would also be required for each of the Related Projects.

Since the construction of either Alternative 4 or the Project could temporarily cause potentially short-term significant impacts, a Construction Management Plan shall be required to ensure construction impacts related to traffic remain less than significant. With incorporation of the

Construction Management Plan for Alternative 4 or the Project, impacts will be less than significant.

Reference

For a complete discussion of the Project's impacts associated with traffic, see Section 4.L, Transportation – Traffic, of the Draft EIR. For a complete discussion of Alternative 4's impacts, see Section 6, Alternatives, of the Draft EIR. See also Appendices L-1 through L-3 of the Draft EIR, and Section 2, Responses to Comments, of the Final EIR.

VI. Significant and Unavoidable Impacts

The Final EIR determined that the environmental impacts set forth below are significant and unavoidable. In order to approve the project with significant unmitigated impacts, the City is required to adopt a Statement of Overriding Considerations, which is set forth in Section XI below. No additional environmental impacts other than those identified below will have a significant effect or result in a substantial or potentially substantial adverse effect on the environment as a result of the construction or operation of the project. The City finds and determines that:

a) All significant environmental impacts that can be feasibly avoided have been eliminated, or substantially lessened through implementation of the project design features and/or mitigation measures; and

b) Based on the Final EIR, the Statement of Overriding Considerations set forth below, and other documents and information in the record with respect to the construction and operation of the project, all remaining unavoidable significant impacts, as set forth in these findings, are overridden by the benefits of the project as described in the Statement of Overriding Considerations for the construction and operation of the project and implementing actions.

Transportation and Traffic

Description of Effects

Cumulative Impacts (Future Year 2020 Conditions with Project)

Estimates of future traffic conditions both with and without the Project, representing cumulative conditions, were developed to evaluate the potential impacts of the Project on the local street system. This discussion details the assumptions used to develop the Future without Project conditions in 2020, which corresponds to projected completion and occupancy of the Project. The same analysis was performed for Alternative 4.

Existing traffic is expected to increase as a result of regional growth and development outside of the study area. Based on discussions with LADOT through the MOU process, an ambient growth factor of 1 percent per year, compounded annually, was used to adjust the existing traffic volumes to reflect the effects of the regional growth and development by 2020. The total adjustment applied over the four-year period was 4.06 percent. This growth factor accounts for increases in traffic due to potential projects not yet proposed or in the early stages of development, as well as projects outside the downtown Los Angeles area.

In accordance with CEQA requirements, the Project Traffic Study also considers the effects of the Project in relation to other known proposed development projects within the vicinity. The list of cumulative development projects is based on information provided by the Department of City

Planning and LADOT, as well as recent studies of projects in the area. There are 183 Related Projects that were considered for purposes of this analysis. Approximately 30 of these projects are within or in the immediate vicinity of the Arts District. Though the buildout years of many of these projects are uncertain and may be well beyond the buildout year of the Proposed Project, and notwithstanding that some may never be approved or developed, they were all considered as part of this traffic study and conservatively assumed to be completed by the Project buildout year of 2020. The traffic growth due to the development of these cumulative development projects considered in this analysis is highly conservative and, by itself, overestimates the actual traffic volume growth in downtown Los Angeles that would likely occur prior to Project buildout year. With the addition of the 1 percent per year ambient growth factor previously discussed, the future cumulative condition is conservative.

Nine of the 21 study intersections would continue to operate at LOS D or better during both the morning and afternoon peak hours under Future with Project Conditions. The remaining 12 intersections would operate at LOS E or F during at least one of the peak hours. Under future (2020) with Project Conditions, the Project is expected to result in significant impacts at 10 of the 21 study intersections, prior to the implementation of mitigation measures. The remaining 11 intersections are not expected to be significantly impacted by the Project under Future with Project Conditions.

With respect to Alternative 4, 9 of the 21 study intersections would continue to operate at LOS D or better during both the morning and afternoon peak hours under Future with Project Conditions. The remaining 12 intersections would operate at LOS E or F during at least one of the peak hours. Under future (2020) with Project Conditions, Alternative 4 is expected to result in significant impacts at 10 of the 21 study intersections, prior to the implementation of mitigation measures. The remaining 11 intersections are not expected to be significantly impacted by Alternative 4 under Future with Project Conditions.

Although significant impacts are identified at the western boundary of the study area under Future with Project Conditions, the Project trips entering and exiting the study area to/from the west are not anticipated to result in a significant impact at the signalized intersections outside of the study area. The signalized intersections of San Pedro Street & 6th Street and San Pedro Street & 7th Street are located to the west of the study area boundary and operate with a total intersection capacity of 1,500 (two-phase signal) and 1,425 vehicles per hour per lane (three-phase signal), respectively. Assuming the Project trips are added to the critical moves of each intersection, the incremental change in V/C ratio with the addition of the Project trips would not result in a significant impact at either intersection, regardless of the LOS. Therefore, the analysis of additional study intersections is not required.

Implementation of Mitigation Measures TR-MM-1 and TR-MM-2 would result in peak hour trip reductions from both the implementation of the TDM program and as a result of the TMO activities. The effectiveness of the proposed traffic mitigation program was analyzed by applying the appropriate trip generation reductions and capacity enhancements from the implementation of the TDM program and the TMO activities that collectively comprise the mitigation measures. Because the continued operation of the TMO after the end of the initial 10-year financial contribution provided by the Project Applicant under Mitigation Measure TR-MM-2 would be dependent upon the participation of other property owners within the designated area, this analysis considers the mitigation of Project traffic impacts under the TDM program and the TMO separately.

The incremental increase in the V/C ratios as a result of the Project would exceed the thresholds of the LADOT significant impacts criteria at a number of study intersections. However, with implementation of mitigation, the Project's cumulative impacts would be

significant and unavoidable with at only one intersection. After the implementation of mitigation, Alternative 4 would also cause significant and unavoidable impacts at the same intersection.

Mitigation Measures

TR-MM-1 – The Project shall develop and implement a Transportation Demand Management (TDM) program to promote non-auto travel, reduce the use of single-occupant vehicle trips, etc. The TDM program shall be subject to review and approval by the City of Los Angeles (Department of City Planning and LADOT). The strategies in the TDM program can include, but are not necessarily limited to, the following:

- Transportation Information Center, educational programs, kiosks and/or other measures
- Promotion and support of carpools and rideshare
- Bicycle amenities such as racks and showers
- Guaranteed ride home (GRH) program
- Incentives for using alternative travel modes
- Parking incentives and administrative support for formation of carpools/vanpools
- On-site TDM coordinator
- Contribution to the City of Los Angeles Bicycle Plan Trust Fund for implementation of bicycle improvements in the Project area
- Mobility hub support

The TDM program outlined below details a set of strategies proposed for the Project designed to reduce peak hour vehicular traffic to and from the Project Site. It is a comprehensive program of design features, transportation services, education programs, and incentive programs intended to reduce the impact of traffic from employees and visitors to the Project Site during the most congested time periods of the day. The following provides further information and description of the above-listed TDM program strategies.

Educational Programs. A key component of a successful TDM program is to make residents, employers, and employees at the Project Site aware of the various programs offered. To this end, a TDM coordinator on the building management staff would reach out to residents, employers, and employees directly to promote the benefits of TDM.

A Transportation Information Center is a centrally-located commuter information center where project employees, tenants, and patrons can obtain information regarding commute programs, and individuals can obtain real-time information for planning travel without using an automobile. A Transportation Information Center will support orientation for new residents and employees as well as providing information about transit schedules, commute planning, rideshare, telecommuting, and bicycle and pedestrian plans.

Project Design Features to Promote Bicycling and Walking. A significant and growing number of people in the City prefer to ride bicycles or walk to their employment given sufficient facilities to make the commute feel safe and convenient. The Project would incorporate features for bicyclists and pedestrians, such as exclusive access points, secured bicycle parking facilities or a bicycle valet system, a bicycle sharing or rental program, or showers. Additionally, the Project Site would be designed to be a friendly and convenient environment for pedestrians.

The Project would contribute a one-time fixed fee to be deposited into the Bicycle Plan Trust Fund to implement bicycle improvements in the Arts District.

Ridesharing Services and Transportation Assurance Programs. The TDM program would provide services to match employees together to establish carpools and vanpools, and

encourage their use by providing a GRH program. Carpools/vanpools provide the potential for employees to come to work relaxed and/or work during the commute and reduce the number of vehicle trips to and from the Project Site. A GRH program assures transportation service to individuals who commute without their personal automobiles. This program overcomes one of the primary objections of those who could choose alternative modes of transportation, which is how to get home or to a child's school in the case of an emergency. The GRH program would cover all employees participating in the carpool/vanpool program or using transit to and from the Project Site in the event of personal or family emergencies. The individual would be reimbursed for a taxi ride or short-term car rental. A support service such as GRH is an important part of TDM implementation that assures an individual he or she will not be "stuck" depending on a ridesharing or transit schedule in the event of an emergency.

Short-Term Car Rentals. The Project would partner with short-term car rental services such as Zip-Car or Car-to-Go, which would provide vehicles available to users for hourly rentals at strategic locations within the downtown Los Angeles area. Similar to the GRH program, this service offers assurance to users of alternative modes of transit that they have options should the need arise to leave at an unscheduled time. Short-term car rentals can be used to travel to business meetings, lunch, or in emergencies, and can provide the source of emergency transportation for those using the GRH program.

Incentives for Using Alternative Travel Modes. The TDM program could incorporate various incentives for use of its programs. For example, eligible employees could be provided with *discounted* monthly transit passes for Metro rail and bus service. Carpool and vanpool users could be offered preferential load/unload areas or convenient designated parking spaces. Those who choose not to drive their own cars and park them at the Project Site could receive a "parking cash-out" subsidy, returning a fee that would otherwise cover the cost of parking. Unbundled parking is a program wherein parking spaces are rented separately from the building space, which allows for a separate charge for parking and the flexibility to vary the number of spaces rented. Unbundling parking is an essential first step toward getting people to understand the economic cost of parking. Without unbundled parking, tenants often assume that parking is free.

Mobility Hub Support. The Project would support existing and/or future efforts by LADOT to provide *first*-mile and last-mile service for transit users through the mobility hub program. Mobility hubs, typically located at or near public transit centers, would provide amenities such as, but not limited to, bicycle parking and rentals, short-term vehicle rentals, and transit information. In cooperation with the proposed Transportation Management Organization (TMO) in the Arts District detailed under Mitigation Measure L-4 below, the Project could provide space for similar amenities at the Project Site to complement future mobility hubs in the study area.

Bikeway Improvements. The Project would contribute $100,000 toward the implementation of bicycle *improvements* within the study area as identified in the 2010 Bicycle Plan and Mobility Plan.

TR-MM-2 – The Project Applicant shall initiate, fund, and market an Arts District Transportation Management Organization (TMO)/Arts District portion of a Downtown TMO to oversee the development, implementation, and operation of TDM strategies and help alleviate current and future traffic congestion throughout the area. The TMO services shall be available to anyone within the general Arts District community, not just residents and tenants of the Proposed Project. The Project Applicant shall agree to initiate and provide seed funding for either the Arts District TMO or the Arts District portion of a Downtown TMO following approval of the Proposed Project by funding TMO operations and marketing efforts. While the City of Los Angeles is still in the early stages of establishing the Downtown/Arts District TMO, similar TMO organizations in Los Angeles have initial budgets

of $200,000 to set up and run the first year and an additional $100,000 to maintain and operate each year thereafter. These costs include development of the TMO, the salary of a part-time TMO manager, and marketing. The Project Applicant shall commit the $200,000 required in the first year to cover the cost of launching the Arts District TMO/Arts District portion of a Downtown TMO and shall commit to nine additional years (10 years in total) as a charter member at annual dues of $25,000. It is anticipated that with almost 30 projects proposed for the Arts District, other major projects will want to join the TMO and participate in the trip-reducing programs of the organization.

A TMO is an organization that oversees the development, implementation, and operation of TDM strategies within a particular study area. Developers, building owners, and businesses are members of the TMO, paying annual dues to support the activities of the TMO. The City of Los Angeles is in the process of forming a Downtown Los Angeles TMO and there is discussion as to whether the TMO would treat downtown Los Angeles as one study area or whether the area would be divided into separate districts. Under either approach, the Arts District would be covered by a TMO.

The Arts District community is a strong candidate for alternative modes of transportation, including walking and bicycling, carpooling and vanpooling, use of public transit, short-term automobile rentals, etc. At present, there is no organization to administrate and promote these options to the public. The Downtown/Arts District TMO would be an organization that helps to promote these services to the community by providing information about available public transportation options and matching people into ridesharing services.

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

These same mitigation measures would apply to Alternative 4.

Finding

Each decision making body of the City finds that all feasible mitigation measures to substantially reduce or avoid the project's traffic impacts have been incorporated into the project.

In accordance with CEQA Guidelines Section 15091, the City finds that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen these significant environmental impacts. The City also finds that specific economic, legal, social, technological or other considerations, including provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or project alternatives. However, while implementation of mitigation measures will reduce the impacts, the project's traffic impact will be significant and unavoidable.

Rationale for Finding

TDM Program Trip Reduction (Mitigation Measure TR-MM-1)

The combined effect of the various strategies implemented as part of the TDM program would result in a reduction in peak hour trip generation by offering services, actions, specific facilities, etc., aimed at encouraging use of alternative transportation modes (e.g., transit, bus, walking, bicycling, carpool, etc.) Trip Generation Handbook, 3nd Edition provides a summary of research of TDM programs at many different employers. Case studies of TDM program implementations are detailed in Appendix E of the Project Traffic Study (see Appendix L-1 to the Draft EIR). At places that had the most comprehensive programs, including both economic incentives (e.g., transit passes, etc.) and support services, the programs resulting in an average 24 percent reduction in commuter vehicles. Thus, as an achievable but conservative performance standard, an overall TDM trip reduction credit of 20 percent was assumed for implementation of Mitigation Measure TR-MM-1.

Thus, the TDM program is expected to result in a reduction of 883 daily trips, including 78 morning peak hour trips and 90 afternoon peak hour trips. The Project, when fully built and occupied and with implementation of the TDM program, would generate a total of 4,112 daily trips, including 299 morning peak hour trips (123 inbound, 176 outbound) and 407 afternoon peak hour trips (229 inbound, 178 outbound). Alternative 4, when fully built and occupied and with implementation of the TDM program, would generate a total of 3,618 daily trips, including 314 morning peak hour trips (172 inbound, 142 outbound) and 376 afternoon peak hour trips (175 inbound, 201 outbound).

The Project and Alternative 4 would be subject to annual monitoring to ensure that the actual trips reductions are consistent with the TDM performance standards. The monitoring program would continue until the Project or Alternative 4 have shown that achievement of the standards have been met consistently for the duration of time determined by LADOT. Exceedances would trigger additional measures to ensure the performance standards are met, and would include for example enhancements to the components of the TDM program to increase the effectiveness of TDM in meeting trip reduction goals, the purchasing of additional transit passes, or monetary payments to fund area-wide transportation improvements that will ensure impacts are mitigated below significance. As detailed in the LADOT Assessment Letter, the preliminary TDM program would be prepared and provided for LADOT review prior to the issuance of the first building permit, and a final TDM program approved by LADOT is required prior to the issuance of the first certificate of occupancy for the Project. These requirements will ensure compliance.

TMO Trip Reduction (Mitigation Measure TR-MM-2)

As noted above, an operating TMO within the study area could lead to as much as a 10 percent reduction in vehicular traffic for trips originating or ending within the Downtown/Arts District TMO area. The Federal Grant supporting the formation of the Downtown TMO was approved on January 15, 2018. The Articles of Incorporation were signed by LADOT and FASTLinkDTLA in April 2018. As detailed in Response to Comment No. B4-24 of the Final EIR, the Downtown TMO would provide or promote on an area-wide scale, including the Arts District and the Project site, services such as employee flex time and modified work schedules, vanpool/carpool programs, non-vehicular commuting, information on alternative travel modes, multi-employer vanpools, promotion and implementation of pedestrian, and bicycle and transit stop enhancements. The TMO would therefore promote the use of transit and the City's bike share and car share programs. Travel analyses in urban Los Angeles show that more than half of the trips within a specific urban zone have a trip length of less than five miles. Thus, approximately 50% of trips in the Downtown/Arts District area have the potential to be directly reduced by the TMO programs. Areas such as the Warner Center, Century City, and Burbank have all run successful TMO's where single-passenger vehicle trips have been reduced substantially and would be expected to reduce single-passenger vehicle trips by as much as 15 percent while increasing transit ridership, use of ridesharing, and non-automotive modes of transportation such as walking and bicycling. Overall, since the Downtown/Arts District TMO is expected to

approach the effectiveness of those TMOs, the Downtown/Arts District TMO would be anticipated to reduce vehicular traffic for trips originating or ending within area by 10 percent. Recognizing that some of the trips on the streets in the Arts District are trips merely passing through, the 10 percent trip reduction was conservatively reduced to a 7 percent performance standard for overall reductions in vehicular traffic.

Given the Project Applicant's commitment (under Mitigation Measure TR-MM-2) to fund the start-up of the TMO for the Arts District, the Proposed Project and Alternative 4 each would receive credit from LADOT for a 1 percent increase in the intersection capacity of the study area intersections as a result of the trip reduction programs operated by the TMO. That credit conservatively assumes a lower rate of overall trip reduction than the 7 percent reduction discussed above. Other major projects within the study area could make similar initial contributions to the TMO and similar commitments to annual dues and receive similar credits for trip reductions/intersection capacity increases.

Future (2020) with Project Traffic Conditions with Mitigation

The Project-only with Mitigation traffic volumes were also added to the Future (2020) without Project morning and afternoon peak hour traffic volumes. The changes in the V/C ratios at all but one of the 21 study intersections during the weekday morning and afternoon peak hours would be reduced to less than significant levels with implementation of the mitigation program (with the Arts District TMO). Study Intersection No. 15 (Santa Fe Avenue & 7th Street) would continue to have a significant impact even with implementation of the proposed Mitigation Measures for either the Project or Alternative 4. As determined upon consultation with LADOT, no intersection or signalization improvements are available at this intersection. Thus, both Alternative 4 and the Project would have a significant and unavoidable impact at this intersection.

If the proposed TMO in Mitigation Measure TR-MM-2 is not continued past the end of the initial funding period provided by the Project Applicant, as shown in Table 4.L-23, nine of the 10 significantly impacted intersections would remain as significant and unavoidable impacts for either Alternative 4 or the Project.

Since either Alternative 4 or the Project would have significant cumulative impacts associated with traffic, Mitigation Measures TR-MM-1 and TR-MM-2 shall be required to reduce those impacts. With implementation of those mitigation measures, impacts will remain significant and unavoidable at one of the 21 study intersections for either Alternative 4 or the Project.

Reference

For a complete discussion of the project's impacts associated with traffic, see Section 4.L, Transportation and Traffic, and Appendices L-1 through L-3, of the Draft EIR. For a complete discussion of Alternative 4's impacts, see Section 6, Alternatives, of the Draft EIR. See also Appendices L-1 through L-3 of the Draft EIR, and Section 2, Responses to Comments, of the Final EIR.

i. ALTERNATIVES

CEQA requires that an EIR analyze a reasonable range of feasible alternatives that could substantially reduce or avoid the significant impacts of a project while also meeting the project's basic objectives. An EIR must identify ways to substantially reduce or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1). Accordingly, the discussion of alternatives shall focus on alternatives to a project or its location which are capable of avoiding or substantially reducing any significant effects of the project,

even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The alternative analysis included in the Draft EIR, therefore, identified a reasonable range of project alternatives focused on avoiding or substantially reducing the project's significant impacts.

Summary of Findings

Based upon the following analysis, the City finds, pursuant to CEQA Guidelines Section 15096(g)(2), that no feasible alternative or mitigation measure will substantially lessen any significant effect of the project, reduce the significant unavoidable impacts of the project to a level that is less than significant, or avoid any significant effect the project would have on the environment.

Project Objectives

Section 15124(b) of the California Environmental Quality Act (CEQA) Guidelines states that a project description shall contain "a statement of the objectives sought by the proposed project." In addition, Section 15124(b) of the State CEQA Guidelines further states that "the statement of objectives should include the underlying purpose of the project." The objectives of the Proposed Project are as follows:

2. Redevelop a currently underutilized site into a mixed-use development that combines complementary uses, such as community serving retail and live/work uses.

Supporting objectives of the Project are as follows:

- Improve the aesthetic quality of the site by removing older structures and developing new efficient buildings that are consistent with others within the burgeoning Arts District.
- Create a range of construction and permanent jobs.
- Improve public safety by creating a development that provides the level of density and mix of uses necessary to activate the area both day and night.
- To meet the demand for urban housing within the general Downtown area and specifically within the Arts District.
- Provide housing in proximity to the Metro Gold Line Station and other mass transit opportunities.
- To develop an economically feasible project featuring a high level of quality in architectural design and building construction that can serve as a northern gateway to the Arts District.

Alternatives Analyzed in the Draft EIR and Final EIR

CEQA requires that an EIR analyze a reasonable range of feasible alternatives that could substantially reduce or avoid the significant impacts of a project while also meeting a project's basic objectives.

Each decision-making body of the City finds that given the potential impacts of the project, the Final EIR considered a reasonable range of alternatives to the project to provide informed decision-making in accordance with Section 15126.6 of the CEQA Guidelines.

Based on the significant environmental impacts of the project and the objectives established for the project, the following alternatives to the project were evaluated in the Final EIR:

- Alternative 1: No Project
- Alternative 2: Reconfigured/Reduced Project

- Alternative 3: Reduced Commercial Density
- Alternative 4: Reduced Residential/Increased Commercial Density
- Alternative 5: Apartments/Increased Commercial

Alternative 1 - No Project

Description of Alternative

Under the No Project Alternative, the Project would not be implemented and the Project Site would remain in its existing conditions. The No Project Alternative assumes the Related Projects would move forward. Future on-site activities would be limited to the continued operation and maintenance of existing land uses, specifically the warehouse distribution center.

Impact Summary of Alternative

The No Project Alternative's impact would have no impacts on aesthetics, as the alternative would not create a change in the visual character of the Project Site, block view sheds, create shadows on adjacent land uses, or create new sources of glare and lighting. For the same reasons as the Project and Alternative 4, the No Project Alternative would have no impact to agricultural and forestry resources. This Alternative would also have no impact with respect to air quality since as no demolition, grading, or construction would occur and no new vehicle trips would be generated under this Alternative. Alternative 1 would also have no impact with respect to biological resources, as the Project Site is currently developed and does not contain any natural open spaces, act as a wildlife corridor, contain riparian habitat, wetland habitat, migratory corridors, and does not possess any significant biological resources. Alternative 1 would have no impacts to significant historical, cultural or tribal resources since no demolition or other construction would occur. Alternative 1 would have slightly greater impacts with respect to geology because this alternative would not involve new construction of seismically superior buildings on the Project Site due to updates in the Building Code.

Further, this Alternative would not be expected to result in increased GHG emissions, as it would not increase electricity and natural gas consumption, vehicle miles traveled, water use, or solid waste generation. Alternative 1 would have no impact to hazards and hazardous materials, since there would be no demolition or construction and the alternative would not have the potential to encounter contaminated soil, asbestos, and lead-based pain at the Project Site. Alternative 1 would not involve any impacts to hydrology and water quality since no new development would occur. Alternative 1 would result in no impacts to land use and planning, as the alternative is consistent with existing zoning and land use plans. Alternative 1 would have no impact to mineral resources, as the Project Site is not located within a designated oil drilling area or a designed Mineral Resource Zone. Alternative 1 would have no impact with respect to noise, as no new sources of noise or vibration would be created because no demolition or construction would occur. Alternative 1 would have no impact to population and housing, as there would be no development would add population, housing, or employment to the Project Site. Alternative 1 would have no impact on public services, as no additional demand for public services beyond the existing demand from land uses currently on the Project Site would occur. Alternative 1 would result in no impacts to transportation and traffic, as no traffic would be generated beyond the traffic already associated with land uses currently at the Project Site. Alternative 1 would result in no impact with respect to utilities, as it would not lead to impacts related to wastewater, water, solid waste, electricity, or natural gas beyond the existing demand associated with the land uses currently on the Project Site.

Finding

With respect to Alternative 1, each decision making body of the City adopts the third possible finding as outlined above in Subsection III, which states that "specific economic, legal, social,

technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR." (CEQA Guidelines Section 15091(a)(3)).

Rationale for Finding

No new development would occur under the No Project Alternative and the project site would continue to operate as it does currently. As such, Alternative 1 would not meet the underlying purpose of the project or the project objectives. While the No Project Alternative would not result in the significant impact related to traffic, it would not satisfy any of the Project's objectives. Accordingly, each decision making body of the City rejects the No Project as infeasible.

Reference

For a complete discussion of impacts associated with Alternative 1, see Section 6, Alternatives, of the Draft EIR.

Alternative 2 – Reconfigured/Reduced Project

Description of Alternative

Alternative 2 would involve the demolition of all existing buildings on the Project Site. The Reconfigured/Reduced Project Alternative (Alternative 2) would develop nearly the same land uses and densities as the Proposed Project with the only difference being a reduction of 10 live/work units, but would configure the development differently across the Project Site. Alternative 2 would develop 590 live/work units, as well as the same amount of office (20,000 square feet), retail (15,000 square feet), restaurant (15,000 square feet), and cultural (10,000 square feet) space. Alternative 2 would develop the live/work units in a tower building above a two-and-a-half level (above street grade) podium base that would contain the commercial, office, and cultural uses and parking space. Under Alternative 2, the live/work units would be bunched largely in the northeastern portion of the site such that the tower building would be configured in a C shape, open to the south, with the western and north-central portions of the tower being 22 stories and 240 feet in height above street grade and the north-eastern and eastern portions of the tower being 10 stories and 109 feet in height above street grade. Although the main building would be built to a height of 240 feet, a provision for facilities serving the rooftop amenities would project an additional 12 feet for a total maximum building height of 252 feet.

Essentially, the majority of the live/work units would be grouped in the center of the Project Site under Alternative 2. The height of the podium base would remain the same as with the Proposed Project, with the result being that, under Alternative 2, building heights along the west, southwest, and northwest edges of the site would reflect the height of the podium only, ranging from approximately 20 to 33 feet above street grade.

Impact Summary of Alternative

Alternative 2's impacts related to aesthetics would be less than significant, as Alternative 2 would not affect any scenic vistas or significant view corridors and the architecture, height and massing would be compatible with the surrounding properties. Also, Alternative 2 would not cause any significant impacts associated with nighttime lighting or signage. Alternative 2 would have no impact to agricultural and forestry resources, as the Project Site does not contain any agricultural or forestry uses. After implementation of mitigation measures, construction and operation of Alternative 2 would not cause any significant impacts related to localized or regional air quality. Alternative 2 would also have no impact with respect to biological resources, as the Project Site is currently developed and does not contain any natural open spaces, act as a wildlife corridor, contain riparian habitat, wetland habitat, migratory corridors, and does not

possess any areas of significant biological resources. Alternative 2 would not cause any significant impacts to cultural, tribal or historical resources, and conditions of approval and regulatory measures would address any unknown resources encountered during construction. Alternative 2 would have the same potential impacts to geology and soils, as the Project Site presents the same potential geologic and geotechnical conditions regardless of the type of development, and Alternative 2 would be required to conform to the City's building code standards. With respect to GHG emissions, construction and operation of Alternative 2 would cause less than significant impact since it would be consistent with all applicable plans and regulations concerning GHG emissions.

Alternative 2 would have similar impacts as the Project to hazards and hazardous materials, as Alternative 2 would have the potential to result in impacts with respect to contaminated soil, asbestos, and lead-based paint at the Project Site. However, those impacts can be mitigated, in addition to other measures, by the development and implementation of a Soil Management Plan. Alternative 2 would also develop uses on the Project Site that involve the transport, use, or disposal of hazardous materials that are typical for retail use, but would not cause any significant impacts. Alternative 2 would result in less than significant impacts to water hydrology and water quality since runoff from the Site does not discharge to the Los Angeles River and all applicable regulations concerning water quality would be satisfied. Further, Alternative 2 would be consistent with applicable land use policies for the same reasons as the Project and Alternative 4.

Alternative 2's noise impacts attributable to construction and operation would be less than significant, and similar to the Project and Alternative 4, after implementation of mitigation measures. For the same reasons as with the Project and Alternative 4, Alternative 2 would not cause a significant impact as to housing and employment. Alternative 2's impacts to public services would be less than significant with respect to fire protection, police protection, schools, parks and recreation, and libraries since Alternative 2 proposes only 10 fewer live/work units than the Project and the Project's impacts in those areas are less than significant. Alternative 2 would generate slightly fewer daily vehicle trips since ten fewer live/work units would be developed. However, after implementation of mitigation measures, Alternative 2 would result in a significant and unavoidable traffic impact to the intersection that would be significantly impacted by the Project as well as Alternative 4. Alternative 2 would generate a similar amount of wastewater, demand less water, and generate less solid waste as compared to the Proposed Project, and such impacts would be less than significant.

In sum, Alternative 2 would not avoid the significant traffic impact related to the Project's operation of the Project or Alternative 4.

Finding

With respect to Alternative 2, each decision making body of the City finds pursuant to CEQA Guidelines section 15126.6 that Alternative 2 would be consistent with all of the secondary Project Objectives to the same degree as the Proposed Project with the exception of the objective to meet the demand for urban housing within the Downtown/Arts District, which Alternative 2 would achieve but to a slightly lesser degree than would the Proposed Project.

Rationale for Finding

Alternative 2 would meet the basic project objective to revitalize and redevelop the Project Site with a mixed-use development that combines complementary uses, such as community serving retail and live/work uses. Alternative 2 would attain this basic project objective to the same degree as the Project and Alternative 4.

With respect to the secondary Project objectives, Alternative 2 would improve the aesthetic quality of the site by removing older structures and developing new efficient buildings that are consistent with others within the Arts District. Alternative 2 would provide a range of construction and permanent jobs and would improve public safety by creating a development that provides the level of density and mix of uses necessary to activate the area both day and night. Alternative 2 would also meet the demand for urban housing within the general Downtown area and specifically within the Arts District, although Alternative 2 would not create as much housing as the Proposed Project. Alternative 2 would provide housing in proximity to the Metro Gold Line Station and other mass transit opportunities. Alternative 2 would develop an economically feasible project featuring a high level of quality in architectural design and building construction that can serve as a northern gateway to the Arts District.

Reference

For a complete discussion of impacts associated with Alternative 2, see Section 6, Alternatives, of the Draft EIR.

Alternative 3 – Reduced Commercial Density

Description of Alternative

Alternative 3 would involve demolition of all existing buildings on the Project Site and would consist of the Reduced Commercial Density Project Alternative (Alternative 3) and would develop the same mix of land uses, but would reduce the number of proposed live/work units from 600 to 500 and would reduce the proposed commercial space from 60,000 square feet to 20,000 square feet, eliminating the cultural space and the office space and reducing the retail and restaurant space from 15,000 square feet each to 10,000 square feet each. In addition, the development would be configured differently with a single 85-foot high, eight-story building surrounding an interior elevated courtyard. Under Alternative 3, the podium base (Levels 1-3) would consist of concrete frame construction, while the upper levels containing the live/work units (Levels 4-8) would consist of wood frame construction.

Alternative 3 would develop 500 live/work units, as well as retail (10,000 square feet), and restaurant (10,000 square feet) space. Alternative 3 would develop the live/work units in a tower building above a two-and-a-half level (above street grade) podium base that would contain the commercial and office uses and parking space. However, as noted above, under Alternative 3, the live/work units would surround a central courtyard area that would be located on top of the podium base. No portion of this courtyard area would be visible from off-site as the upper floors would completely surround it. The height of the podium base would be lower (approximately 17 feet above street grade) than with the Proposed Project, although the upper floors would rise consistently above the base to the roofline on all four sides of the Project Site. Thus, when viewed from any direction, the proposed building would be 85 feet above street grade along the perimeter of the Project Site.

Impact Summary of Alternative

Alternative 3's impacts related to aesthetics would be less than significant, as Alternative 3 would not affect any scenic vistas or significant view corridors and the architecture, height and massing would be compatible with the surrounding properties. Also, Alternative 3 would not cause any significant impacts associated with nighttime lighting or signage. Alternative 3 would have no impact to agricultural and forestry resources, as the Project Site does not contain any agricultural or forestry uses. After implementation of mitigation measures, construction and operation of Alternative 3 would not cause any significant impacts related to localized or regional air quality. Alternative 3 would also have no impact with respect to biological resources, as the Project Site is currently developed and does not contain any natural open spaces, act as a wildlife corridor, contain riparian habitat, wetland habitat, migratory corridors, and does not

possess any areas of significant biological resources. Alternative 3 would not cause any significant impacts to cultural, tribal or historical resources, and conditions of approval and regulatory measures would address any unknown resources encountered during construction. Alternative 3 would have the same potential impacts to geology and soils, as the Project Site presents the same potential geologic and geotechnical conditions regardless of the type of development, and Alternative 3 would be required to conform to the City's building code standards. With respect to GHG emissions, construction and operation of Alternative 3 would cause less than significant impact since it would be consistent with all applicable plans and regulations concerning GHG emissions.

Alternative 3 would have similar impacts as the Project to hazards and hazardous materials, as Alternative 3 would have the potential to result in impacts with respect to contaminated soil, asbestos, and lead-based paint at the Project Site. However, those impacts can be mitigated, in addition to other measures, by the development and implementation of a Soil Management Plan. Alternative 3 would also develop uses on the Project Site that involve the transport, use, or disposal of hazardous materials that are typical for retail use, but would not cause any significant impacts. Alternative 3 would result in less than significant impacts to water hydrology and water quality since runoff from the Site does not discharge to the Los Angeles River and all applicable regulations concerning water quality would be satisfied. Further, Alternative 3 would be consistent with applicable land use policies for the same reasons as the Project and Alternative 4.

Alternative 3's noise impacts attributable to construction and operation would be less than significant, and similar to the Project and Alternative 4, after implementation of mitigation measures. For the same reasons as with the Project and Alternative 4, Alternative 3 would not cause a significant impact as to housing and employment. Alternative 2's impacts to public services would be less than significant with respect to fire protection, police protection, schools, parks and recreation, and libraries since Alternative 3 proposes less residential and commercial uses. Alternative 3 would generate fewer daily vehicle trips given its reduced density, and, therefore, Alternative 3 would avoid the significant traffic impact to the intersection that would be significantly impacted by the Project as well as Alternative 4. Alternative 3 would generate less wastewater, demand less water, and generate less solid waste as compared to the Proposed Project or Alternative 4 given its reduced density, and such impacts would be less than significant.

In sum, Alternative 3 would avoid one significant traffic impact related to operation of the Project or Alternative 4.

Finding

With respect to Alternative 3, each decision making body of the City finds pursuant to CEQA Guidelines section 15126.6 that Alternative 3 would be consistent with the Project Objectives but to a lesser degree than the Proposed Project since it would completely eliminate office uses and reduce other uses.

Rationale for Finding

Alternative 3 would meet the basic project objective to revitalize and redevelop the Project Site with a mixed-use development that combines complementary uses, such as community serving retail and live/work uses, although Alternative 3 would meet this basic project objective to a lesser degree given the elimination of the office space and reduction in restaurant and retail space.

With respect to the secondary project objectives, Alternative 3 would improve the aesthetic quality of the site by removing older structures and developing new efficient buildings that are consistent with others within the Arts District. Alternative 3 would provide a range of construction jobs, but far fewer permanent jobs than the Project or Alternative 4 due largely to the elimination of the office space and reduction in restaurant and retail space. Alternative 3 would improve public safety by creating a development that provides the level of density and mix of uses necessary to activate the area both day and night. Alternative 3 would also meet the demand for urban housing within the general Downtown area and specifically within the Arts District, although Alternative 3 would not create as much housing as the Proposed Project. Alternative 3 would provide housing in proximity to the Metro Gold Line Station and other mass transit opportunities. Alternative 3 would develop an economically feasible project featuring quality architectural design that can serve as a northern gateway to the Arts District, although the aesthetic appearance of the architectural features necessitated by the change to wood-frame construction may be less appealing to some and the loss of the cultural space would lessen the development's ability to serve the needs of local artists.

Reference

For a complete discussion of impacts associated with Alternative 3, see Section 6, Alternatives, of the Draft EIR.

Alternative 4 – Reduced Residential/Increased Commercial Density

Description of Alternative

Alternative 4 would involve the demolition of all existing buildings on the Project Site. The Reduced Residential/Increased Commercial Density (Alternative 4) would develop 125 fewer live/work units (475) and 85,000 square feet more office space (105,000) than the Proposed Project. The amount of retail and restaurant space built under Alternative 4 would be reduced by 5,000 square feet each, or 10,000 total square feet, as compared to the Project, and the cultural space would be eliminated. Alternative 4 would be configured differently across the Project Site than the Proposed Project. Alternative 4 would develop 475 live/work units, as well as 105,000 square feet of office, 10,000 square feet of retail, and 10,000 square feet of restaurant space. As with the Proposed Project, Alternative 4 would develop the live/work units in a tower building above a two-and-a-half level (above street grade) podium base that would contain the commercial uses and the above-grade parking spaces. However, under Alternative 4, the live/work units would be contained in a rectangular tower building occupying the east-central portion of the Project Site. The live/work tower would be 370 feet in height above street grade, including the rooftop penthouse. An elevated courtyard on top of the podium base would occupy the southeastern portion of the site and would contain a variety of open space amenities for the use of residents, tenants, guests, and visitors. This courtyard would be located approximately 35 feet above street grade. The office portion of the Project would be contained in a separate six-story tower on top of the podium base to the west of the live/work tower on the Mateo Street side of the site. The office component would have a height of approximately 91 feet above street grade, excluding mechanical rooftop extensions.

Impact Summary of Alternative

Detailed Findings are made in Sections IV through VI above, with respect to the potential environmental impacts of Alternative 4.

Finding

With respect to Alternative 4, each decision making body of the City finds pursuant to CEQA Guidelines section 15126.6 that Alternative 4 would be consistent with all of the secondary Project Objectives to the same degree as the Proposed Project with the exception of the

objective to meet the demand for urban housing within the Downtown/Arts District, which Alternative 4 would achieve to a lesser degree than would the Proposed Project due to a reduction in the total number of dwelling units. However, Alternative 4 meets almost all of the Project Objectives to the same extent of the Proposed Project, would not cause any significant and unavoidable impacts not caused by the Proposed Project, and would not significantly worsen the Project's one significant traffic impact at Santa Fe Avenue and 7th Street. Therefore, Alternative 4 can be approved by the City as the project.

Rationale for Finding

Alternative 4 would meet the basic project objective to revitalize and redevelop the Project Site with a mixed-use development that combines complementary uses, such as commercial, community serving retail, office, and live/work uses. Alternative 4 would attain this basic project objective to essentially same degree as the Proposed Project.

With respect to the secondary Project objectives, Alternative 4 would improve the aesthetic quality of the site by removing older structures and developing new efficient buildings that are consistent with others within the Arts District. Alternative 4 would provide a range of construction and permanent jobs and would improve public safety by creating a development that provides the level of density and mix of uses necessary to activate the area both day and night. Alternative 4 would also meet the demand for urban housing within the general Downtown area and specifically within the Arts District, although Alternative 4 would not create as much housing as the Proposed Project. Alternative 4 would provide housing in proximity to the Metro Gold Line Station and other mass transit opportunities. Alternative 4 would develop an economically feasible project featuring a high level of quality in architectural design and building construction that can serve as a northern gateway to the Arts District.

Reference

For a complete discussion of impacts associated with Alternative 4, see Section 6, Alternatives, of the Draft EIR.

Alternative 5 – Apartments/Increased Commercial Density

Description of Alternative

The Apartments/Increased Commercial Density (Alternative 5) would develop the same number of residential units (600) as the Proposed Project; however, the units would be traditional apartments rather than live/work units. Alternative 5 would also increase the amount of commercial office space from 20,000 to 105,000 square feet. The amount of retail and restaurant space built under Alternative 5 would be reduced by 5,000 square feet each, or 10,000 total square feet as compared to the Project, and the cultural space would be eliminated. Alternative 5 would be configured differently across the Project Site than the Proposed Project and would have the same maximum height as Alternative 4. Alternative 5 would develop 600 apartment units, as well as 105,000 square feet of office, 10,000 square feet of retail, and 10,000 square feet of restaurant space. Alternative 5 would develop the apartment units in a tower building above a two-and-a-half level (above street grade) podium base that would contain the commercial uses and the above-grade parking spaces. Under Alternative 5, the apartment units would be contained in a rectangular tower building occupying the east-central portion of the Project Site. The residential tower would be 370 feet in height above street grade. An elevated courtyard on top of the podium base would occupy the eastern portion of the site and would contain a variety of open space amenities for the use of residents, tenants, guests, and visitors. This courtyard would be located approximately 35 feet above street grade. The office portion of the Project would be contained in five levels on top of the podium base to the west of the apartment tower on the Mateo Street side of the site. The office component would have a height of approximately 91 feet above street grade.

Impact Summary of Alternative

Alternative 5's impacts related to aesthetics would be less than significant, as Alternative 5 would not affect any scenic vistas or significant view corridors and the architecture, height and massing would be compatible with the surrounding properties. Also, Alternative 5 would not cause any significant impacts associated with nighttime lighting or signage. Alternative 5 would have no impact to agricultural and forestry resources, as the Project Site does not contain any agricultural or forestry uses. After implementation of mitigation measures, construction and operation of Alternative 5 would not cause any significant impacts related to localized or regional air quality. Alternative 5 would also have no impact with respect to biological resources, as the Project Site is currently developed and does not contain any natural open spaces, act as a wildlife corridor, contain riparian habitat, wetland habitat, migratory corridors, and does not possess any areas of significant biological resources. Alternative 5 would not cause any significant impacts to cultural, tribal or historical resources, and conditions of approval and regulatory measures would address any unknown resources encountered during construction. Alternative 5 would have the same potential impacts to geology and soils, as the Project Site presents the same potential geologic and geotechnical conditions regardless of the type of development, and Alternative 5 would be required to conform to the City's building code standards. With respect to GHG emissions, construction and operation of Alternative 5 would cause less than significant impact since it would be consistent with all applicable plans and regulations concerning GHG emissions.

Alternative 5 would have similar impacts as the Project to hazards and hazardous materials, as Alternative 5 would have the potential to result in impacts with respect to contaminated soil, asbestos, and lead-based paint at the Project Site. However, those impacts can be mitigated, in addition to other measures, by the development and implementation of a Soil Management Plan. Alternative 5 would also develop uses on the Project Site that involve the transport, use, or disposal of hazardous materials that are typical for retail use, but would not cause any significant impact. Alternative 5 would result in less than significant impacts to water hydrology and water quality since runoff from the Site does not discharge to the Los Angeles River and all applicable regulations concerning water quality would be satisfied. Further, Alternative 5 would be consistent with applicable land use policies for the same reasons as the Project and Alternative 4.

Alternative 5's noise impacts attributable to construction and operation would be less than significant, and similar to the Project and Alternative 4, after implementation of mitigation measures. For the same reasons as with the Project and Alternative 4, Alternative 5 would not cause a significant impact as to housing and employment. Alternative 5's impacts to public services would be less than significant with respect to fire protection, police protection, schools, parks and recreation, as is the case with the Proposed Project and Alternative 4. Similarly, Alternative 5 would generate a similar amount of wastewater demands for water, and solid waste as compared to the Proposed Project and Alternative 4, and such impacts would be less than significant. Alternative 5 would generate daily vehicle trips such that Alternative 5 would result in the significant and unavoidable traffic impact to the intersection that would be significantly impacted by the Project as well as Alternative 4.

Finding

With respect to Alternative 5, each decision making body of the City finds pursuant to CEQA Guidelines section 15126.6 that Alternative 5 would attain the basic project objective to a lesser degree than the Proposed Project due to the replacement of the live/work uses with traditional apartments, and would be consistent with the secondary Project Objectives to the same degree as the Proposed Project, except for objective 2 and 5 since live/work uses are more consistent with Arts District development than traditional apartments.

Rationale for Finding

Alternative 5 would meet the basic project objective to revitalize and redevelop the Project Site with a mixed-use development that combines complementary uses, such as community serving retail, office, and residential uses. Alternative 5 would attain this basic project objective to a lesser degree than the Proposed Project due to the replacement of the live/work uses with traditional apartments.

With respect to the secondary Project objectives, Alternative 5 would improve the aesthetic quality of the site by removing older structures and developing new efficient buildings that are consistent with others within the Arts District. Alternative 5 would provide a range of construction and permanent jobs and would improve public safety by creating a development that provides the level of density and mix of uses necessary to activate the area both day and night. Alternative 5 would also meet the demand for urban housing within the general Downtown area and specifically within the Arts District. Alternative 5 would provide housing in proximity to the Metro Gold Line Station and other mass transit opportunities. Alternative 5 would develop an economically feasible project featuring a high level of quality in architectural design and building construction that can serve as a northern gateway to the Arts District.

Reference

For a complete discussion of impacts associated with Alternative 5, see Section 6, Alternatives, of the Draft EIR.

Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives. An environmentally superior alternative is an alternative to a project that would reduce and/or eliminate the significant, unavoidable environmental impacts associated with the project without creating other significant impacts and without substantially reducing and/or eliminating the environmental benefits attributable to the project.

Alternative 1 (No Project Alternative) would have the fewest environmental impacts and would not result in any significant and unavoidable impacts. However, the CEQA Guidelines section 15126.6 states that if the No Project Alternative is the environmentally superior alternative, the lead agency must consider another environmentally superior alternative from the remaining list of alternatives considered.

Alternative 3 (Reduced Commercial Density) was selected as the Environmentally Superior Alternative because this alternative would reduce the sole significant and unavoidable impact of the Proposed Project and Alternative 4 (traffic impacts at the intersection of Santa Fe Avenue and 7th Street) to a less than significant level. Alternative 3, however, would not meet the Project Objectives to the same **degree** as either the Project or Alternative 4 because it would develop less commercial space, reducing the multiple environmental benefits that arise from mixed-use development in an urban location.

Alternatives Rejected as Being Infeasible

Section 15126.6(c) of the CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible, and briefly explain the reasons underlying the lead agency's determination. According to the CEQA Guidelines, among the

factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives can be rejected by the City for specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, that make infeasible the project alternatives identified in the final EIR. Alternatives to the project that have been considered and rejected as infeasible include the following:

Alternative Off-Site Location: An alternative that would develop the Project on a different site (Alternative Site Alternative) was initially considered but rejected as infeasible. Under the Alternative Site Alternative, the Project would be constructed on a site other than the Project Site. This alternative was deemed infeasible as the Project Applicant does not own or control another site of comparable size on a major street within the downtown area of the City of Los Angeles and in close proximity to major transit facilities. Accordingly, any alternative site location would not meet the Project objectives.

i. OTHER CEQA FINDINGS

Summary of Significant and Unavoidable Impacts

Pursuant to Section 15126.2(b) of the CEQA Guidelines, the City finds that the Project and Alternative 4 would result in significant and unavoidable environmental impacts with respect to traffic.

Traffic

Project-generated traffic, in combination with traffic generated by other proposed development and growth within the general vicinity of the Project Site, would result in an exceedance of the City's significant impact threshold with respect to level of service (LOS) at the Santa Fe Avenue/7th Street intersection in both the morning and afternoon peak periods. No mitigations are available to either increase intersection capacity or further reduce Project-generated trips at this location beyond what is achievable through Mitigation Measures TR-MM-1 and TR-MM-2. Thus, this would represent a potentially significant and unavoidable impact for the Proposed Project and Alternative 4.

Significant Irreversible Environmental Changes

Pursuant to section 15126.2(c) of the CEQA Guidelines, the City considered the potential significant irreversible environmental changes that could result from the Project. The Project would consume limited, slowly renewable and non-renewable resources. This consumption would occur during the Project's construction and would continue throughout its operational lifetime. Development of the Project or Alternative 4 would require a commitment of resources that would include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and people to and from the Project Site.

Demolition of the buildings on the Project Site would result in production of waste material. However, the Project would recycle and salvage demolition and construction debris, including asphalt, wood, drywall, metals, and other miscellaneous and composite materials. Proper separation of demolition debris would assist environmental clean-up and allow for proper disposal of hazardous materials that may be found within existing buildings. Further, the City passed an ordinance in 2010 that requires all mixed Construction and Demolition ("C&D") waste generated within the City to be taken to certified C&D waste processors. Some of the City's C&D facilities that reuse or recycle C&D waste have already reached a 100 percent recycling rate.

The Project's construction would require consumption of resources that cannot be replenished or which may renew slowly as to be considered non-renewable, including certain types of lumber and other forest products, aggregate materials used in concrete and asphalt, metals, petrochemical construction materials, and water. Fossil fuels, such as gasoline and oil, would also be consumed in the use of construction vehicles and equipment. The commitment of resources required for the type and level of proposed development would limit the availability of these resources for future generations for other uses during operation of the Project. However, this resource consumption would be consistent with growth and anticipated change in the Los Angeles Region.

With respect to operation, the Project would be developed in a densely populated urban area and would provide greater density in close proximity to existing transit, as well as proximate to the Metro Gold Line Little Tokyo/Arts District Station, thereby reducing vehicle miles traveled. This would also potentially reduce, rather than increase, the need for additional infrastructure. Additionally, the Project would incorporate sustainable design features to reduce the Project's environmental impacts.

As a result of the Project's compliance with the applicable conservation and sustainable measures, no significant irreversible environmental changes would result from the Project. The same is true of Alternative 4.

Growth-Inducing Impacts

Pursuant to section 15126.2(d) of the CEQA Guidelines, the City considered the Project's potential growth-inducing impacts, as well as impacts from Alternative 4. Generally, a Project may foster or encourage population growth in a geographic area if it meets any of the following criteria: (i) economic expansion or growth (e.g., changes in revenue base, employment expansion, etc.); (ii) removal of an impediment to growth (e.g., establishment of an essential public service or the provision of new access to an area); (iii) establishment of a precedent-setting action (e.g., an innovation, a change in zoning, or general plan amendment approval); or (iv) development of or encroachment on an isolated adjacent area of open space (being distinct from an "infill" type of encroachment).

Although the Project would provide new live/work, commercial, cultural, and office uses, it would not necessitate the extension of roads or other infrastructure. The Project would be developed in a densely populated urban area and would provide greater density around existing and planned transit. The Project's location would reduce vehicle miles traveled and would potentially reduce, rather than increase, the need for additional infrastructure. Street access and utilities are fully built-out in the area.

The Project responds to the unmet housing demand in both the Central City North Community Plan Area and the City of Los Angeles as a whole. Specifically, the Project would help achieve a portion of the household growth forecast for the City while also being consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of vehicle miles traveled. Thus, while the Project does propose additional housing units, it would not substantially induce housing growth beyond forecasted levels.

The Project's addition of employees could come from the Project area and other areas in the City, especially since the types of land uses are not specialized to compel a net increase in employees from a region outside the local area (or Los Angeles). Employees are assumed to be housed in the local area or Los Angeles, and can access the Site through multiple modes of transit.

The roadways and other infrastructure associated with the Project would not induce growth because they would only serve the Project. The Project Site is already developed and connected to all local utility infrastructures, including water, wastewater, electricity, and natural gas. Therefore, utility infrastructure would not be expanding into a new area as a result of the Project.

Finally, the Project would not provide for the removal of an impediment to growth and will not develop or encroach on an isolated or adjacent area of open space. The Project would not be a public service or provide access to a new area or encroach on open space. The Project would be located on an already developed site in the City that is densely urban and served by roadways.

For all those reasons, the Project and Alternative 4 would not result in a direct significant growth-inducing impact in the project area.

IX. OTHER CEQA CONSIDERATIONS

11. The City, acting through the Planning Department, is the "Lead Agency" for the Project evaluated in the Final EIR. The City finds that the Final EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the Final EIR, and that the Final EIR reflects the independent judgment of the City.

12. The City finds that the Final EIR provides objective information to assist the decision-makers and the public at large in their consideration of the environmental consequences of the Project. The public review period provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft EIR. The Final EIR was prepared after the review period and adequately responds to comments made during the public review period.

13. The Planning Department evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the Planning Department prepared written responses describing the disposition of significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned responses to the comments. The Planning Department reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR as defined under CEQA. The lead agency has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the Final EIR.

14. The mitigation measures which have been identified for the Project were identified in the text and summary of the Final EIR. The final mitigation measures are described in the Mitigation Monitoring Program. Each of the mitigation measures identified in the Mitigation Monitoring Program, and contained in the Final EIR, is incorporated into conditions of approval for the Project. The City finds that the impacts of the Project have been mitigated to the extent feasible by the mitigation measures identified in the Mitigation Monitoring Program and contained in the Final EIR.

15. CEQA requires the lead agency approving a project to adopt a Mitigation Monitoring Program and make that Program a condition of project approval in order to ensure compliance with project implementation. The mitigation measures included in the Final EIR as certified by the City and included in the Mitigation Monitoring Program as

adopted by the City serve that function. The Mitigation Monitoring Program includes all the mitigation measures identified in the Final EIR and has been designed to ensure compliance during implementation of the Project. In accordance with CEQA, the Mitigation Monitoring Program provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of Public Resources Code section 21081.6, the City hereby adopts the Mitigation Monitoring Program.

16. In accordance with the requirements of Public Resources Code section 21081.6, the City hereby adopts each of the mitigation measures expressly set forth herein as conditions of approval for the Project.

17. The custodian of the documents or other materials which constitute the record of proceedings upon which the City's decision is based is the Department of City Planning, City of Los Angeles.

18. The City finds and declares that substantial evidence for each and every finding made herein is contained in the Final EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.

19. The citations provided as references in the Final and Draft EIR for each impact area discussed in these Findings are for reference purposes only and are not intended to represent an exhaustive listing of all evidence that supports these Findings.

20. The City is certifying the EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the Final EIR. It is contemplated that there may be a variety of actions undertaken by other State and local agencies (who might be referred to as "responsible agencies" under CEQA). Because the City is the lead agency for the Project, the Final EIR is intended to be the basis for compliance with CEQA for each of the possible discretionary actions by other State and local agencies to carry out the Project.

X. CONSIDERATION AND APPROVAL OF THE FINAL EIR

Pursuant to Article 7 of the CEQA Guidelines, these Findings have been prepared for the consideration and approval of the Final EIR and the analysis contained herein. The Final EIR was completed in accordance with CEQA; and the decision-making body has reviewed and considered the information contained in the Final EIR prior to the action. Since Alternative 4 (as well as the Proposed Project) will result in a significant and unavoidable impact related to traffic, a Statement of Overriding Considerations will be required.

XI. STATEMENT OF OVERRIDING CONSIDERATIONS

The Final EIR for the Project has identified an unavoidable and significant impact that will result from implementation of the Project as well as Alternative 4. Section 21081 of the Public Resources Code and Section 15093(b) of the CEQA Guidelines provide that when a public agency's decision allows the occurrence of a significant impact identified in a Final EIR that is not at least substantially mitigated to an insignificant level or eliminated, the lead agency must state in writing the reasons to support its action based on the completed EIR and/or other information in the record. Article I of the City of Los Angeles CEQA Guidelines incorporates all of the State CEQA Guidelines contained in title 15, California Code of Regulations, sections 15000 et seq., and hereby requires, pursuant to CEQA Guidelines Section 15093(b) that the decision-maker adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that significant adverse environmental effects have been identified in the Final

EIR that cannot be substantially mitigated to an insignificant level or be eliminated. These Findings and the Statement of Considerations are based on the record of proceedings, including, but not limited to, the Final EIR, and other documents and materials that constitute the record of proceedings.

The following impact of the Project and Alternative 4 cannot be mitigated to less than significant levels with incorporation of all feasible mitigation measures:

Traffic
The Project's cumulative traffic impacts for the Future Year 2020 Plus Project conditions in conjunction with the Related Projects would be significant and unavoidable at the intersection of Santa Fe Avenue and 7th Street. The same significant impact would occur with the implementation of Alternative 4.

Accordingly, the City adopts this Statement of Overriding Considerations. Having (i) adopted all feasible mitigation measures; (ii) rejected as infeasible Alternative 1, and determined that Alternatives 2, 3 and 5 would not meet the Project objectives to the same degree, as discussed above; (iii) recognized the significant and unavoidable impact; and (iv) balanced the benefits of Alternative 4 against its significant and unavoidable impact, the City hereby finds that the benefits outweigh and override the significant unavoidable impacts for the reasons stated below.

The below stated reasons summarize the benefits, goals, and objectives of Alternative 4 and provide the rationale for the benefits of Alternative 4. Any one of the overriding considerations of economic, social, aesthetic and environmental benefits listed below would be sufficient to outweigh the adverse environmental impacts of Alternative 4 and justify its approval.

1. Implementation of Alternative 4 will redevelop a currently underutilized, industrial site in a Transit Priority Area into a mixed-use development that combines complementary uses, such as community retail, office, and residential uses.
2. Implementation of Alternative 4 will create 53 affordable housing units.
3. Implementation of Alternative 4 will further local and regional objectives of reducing vehicle miles traveled and greenhouse gas emissions by providing a mix of uses and increased density in close proximity to existing bus and transit systems.
4. Implementation of Alternative 4 will encourage pedestrian and bicycle activity by providing bicycle parking and pedestrian linkages within the Project.
5. Implementation of Alternative 4 will improve the aesthetic quality of the site by removing older structures and developing new efficient buildings that are more sensitive to adjacent uses.
6. Implementation of Alternative 4 will incorporate sustainable and green building design and construction to promote resource conservation, including waste reduction, efficient water management techniques, and conservation of electricity and energy.
7. During Alternative 4's construction phase, planned construction would generate on-site, full-time jobs. At full development, business activities generated will generate 791 permanent full-time jobs.
8. Implementation of Alternative 4 would increase the amount of annual tax revenue generated by the Project Site by generating an annual sales tax revenue equal to $309,180.
9. Implementation of Alternative 4 will generate construction-related one-time revenues to the City in the amount of $821,970 from Construction Materials Sales Tax, Contractor Gross Receipts Tax and Residential Development Tax.
10. Provide a reasonably significant amount of housing along a major public transportation corridor in furtherance of City's goals and policies and in close proximity to a Gold Line Station.

FINDINGS OF FACT (SUBDIVISION MAP ACT)

In connection with the approval of Vesting Tentative Tract Map No. 74529, the Advisory Agency of the City of Los Angeles, pursuant to Sections 66473.1, 66474.60, .61 and .63 of the State of California Government Code (the Subdivision Map Act), makes the prescribed findings as follows:

(a) THE PROPOSED MAP IS CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

The Vesting Tentative Tract Map was prepared by a Registered Professional Engineer and contains the required components, dimensions, areas, notes, legal description, ownership, applicant, and site address information as required by the Los Angeles Municipal Code ("LAMC").

The Project Site is located within the adopted Central City North Community Plan area and is classified with the Heavy Manufacturing land use designation with the corresponding zone of M3-1-RIO. The project site is not located in a Specific Plan Area. The project site contains 2.23 acres and is located in an area designated as "Artists-in-Residence" in the Central City North Community Plan District, otherwise known as the Arts District. The M3-1 zone corresponds to Height District 1. Pursuant to LAMC Section 12.21.1(A)(1), Height District 1 allows a maximum floor area ratio (FAR) of 1.5:1 and does not limit the height of structures in M designated zones.

In conjunction with the Vesting Tentative Tract Map, the applicant is requesting a General Plan Amendment from "Heavy Manufacturing" to "Regional Center Commercial" and a Vesting Zone Change and Height District Change from M3-1-RIO to C2-2-RIO, under concurrent Case No. CPC-2016-3853-GPA-VZC-HD-ZAD-SPR, including approval of the following requests: 1) Pursuant to LAMC Section 11.5.6, a General Plan Amendment to the Central City North Community Plan to change the project site's land use designation from "Heavy Manufacturing" to "Regional Center Commercial"; 2) Pursuant to LAMC Sections 12.32-F and 12.32-Q, a Vesting Zone and Height District Change from M3-1-RIO to C2-2-RIO; 3) Pursuant to LAMC Section 12.24 X.13, a Zoning Administrators Determination to reduce parking for Joint Living and Work Quarters; 4) Pursuant to LAMC Section 16.05, Site Plan Review for a project that would result in an increase of 50 or more dwelling units. If not approved, the subdivider shall submit a tract map modification. The project will provide 475 dwelling units, have an FAR of 6:1, and will be 370 feet in height, consistent with the C2 Zone. The proposed development is contingent upon the approval of Case No. CPC-2016-3853-GPA-VZC-HD-ZAD-SPR.

The merger and resubdivision for condominium purposes of a 2.23-acre site into one master lot and 14 airspace lots (15 lots total), in conjunction with the construction of a proposed mixed-use development consisting of 475 live/work units (459,760 square feet) and approximately 125,000 square feet of commercial retail and office floor area, is consistent with the General Plan and demonstrates compliance with Sections 17.06 of the Los Angeles Municipal Code as well as with the intent and purpose of the General Plan, with regard to density and use. The project site is not governed by a specific plan.

Although designated and zoned for Heavy Manufacturing uses, the subject site is located within a unique area of the City known as the Arts District. While the Community Plan encourages the protection of industrially zoned properties, it recognizes that due to the location of the site, there may be more appropriate uses for the site. The Community Plan "encourages the continued and expanded development of a thriving artists-in-

residence community in the plan and proposed redevelopment areas." In addition, the proposed project would be consistent with the General Plan Framework's land use objectives for the Regional Center Commercial designation.

Goal 3F:	Mixed-use centers that provide jobs, entertainment, culture, and serve the region.
Policy 3.10.2:	Accommodate and encourage the development of multi-family transportation centers, where appropriate.
Policy 3.10.3:	Promote the development of high-activity areas in appropriate locations that are designed to induce pedestrian activity, in accordance with Pedestrian-Oriented District Policies 3.16.1 through 3.16.3, and to provide adequate transitions with adjacent residential uses at the edges of the centers.

The project would integrate housing with commercial uses and amenities in close proximity to local and regional public transit, including 0.8 miles from the Little Tokyo/Arts District Metro Gold Line Station and less than 1,500 feet from Local/Limited, and Commuter Express Bus line routes. The project would be pedestrian-oriented with access to Mateo Street and Santa Fe Avenue via paseos and landscaped open space, providing linkages to the Little Tokyo/Arts District Station and other surrounding uses. This would ensure complementary and supportive uses within the regional center designation. Generally, regional centers are characterized by 6- to 20-story (or higher) mid- and high-rise buildings as determined in the community plan. The Alternative 4 of the DEIR (ENV-2016-1795-EIR) project proposes a 35-story mixed-use podium style building. The proposed commercial uses would not only provide easier access to amenities for residences of the Arts District, but the proposed office use will bring in an additional employment opportunity to the area. Locating live/work mixed-use development close to transit and incorporating office and commercial shopping areas with retail services and restaurants encourages pedestrian activity and provides an incentive for residents not to use their cars for commuting errands, dining, entertainment and employment, thereby reducing vehicle trips.

In addition, the General Plan Framework contains the following text as it relates to industrially zoned properties:

Economic Development: The mirror of these examples is the deteriorating industrial area with limited future industrial potential, which market forces could recycle into more viable land uses.

As indicated in the Economic Development Chapter of the Framework Element, some existing industrially zoned lands may be inappropriate for new industries and should be converted for other land uses. Where such lands are to be converted, their appropriate use shall be the subject of community wide planning efforts. To that end, the Community Plan Update for Central City North envisions the Arts District as a hybrid industrial mixed-use district with creative office, residential live-work and production activities. The Economic Development Chapter provides for the consideration of a broader array of uses within the industrial zones than has traditionally been acceptable to facilitate the clustering of uses, which may include retail.

The proposed map would also lead to a development that would be consistent with the residential and commercial objectives of the adopted Central City North Community

Plan, a part of the Land Use Element of the City's General Plan. Relevant Policies and Objectives of the Plan include the following:

Central City North Community Plan

Goal 1:	A safe, secure and high quality residential environment for all economic, age and ethnic segments of the plan area.
Policy 1-1.1:	Designate specific lands to provide for adequate multi-family residential development.
Objective 1-2:	To locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities.
Objective 1-4:	To promote and insure the provision of adequate housing for all persons regardless of income, age, or ethnic background.
Policy 1-4.2:	1-4.2 Ensure that new housing opportunities minimize displacement of the existing residents.
Goal 2:	A strong and competitive commercial sector which best serves the needs of the community through maximum efficiency and accessibility while preserving the historic commercial and cultural character of the district.
Objective 2-1:	To conserve and strengthen viable commercial development in the Community and to provide additional opportunities for new commercial development and services.
Objective 2-2:	To attract uses which strengthen the economic base and expand market opportunities for existing and new businesses.
Policy 2-2.3:	Require that the first floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses.
Goal 3:	Sufficient land for a variety of industrial uses, with maximum employment opportunities which are safe for the environment and the work force, and which have minimal adverse impact on adjacent uses.
Objective 3-2:	Encourage the continued development and maintenance of the artists-in-residence community in industrial areas of the proposed redevelopment plan areas and of the plan, as appropriate.
Goal 12:	Encourage alternative modes of transportation to the use of single occupant vehicles (SOV) in order to reduce vehicular trips.

The project helps achieve these goals by providing a mix of land uses by re-designating an underutilized industrial property for development of new live/work units and office space. The proposed project prioritizes jobs and housing by providing live/work units built to Building Code standards, with a mix of Arts and Productive (non-residential) floor area, including an on-site resident production/art gallery museum space, adjacent to the City's largest jobs hub, Downtown Los Angeles, thereby reducing vehicle trips and utilizing existing readily available public transportation.

The 2013-2021 Housing Element of the General Plan is the City's blueprint for meeting housing and growth challenges. The Housing Element identifies a need for more housing while Chapter 6 of the Housing Element lists the goals, objectives, policies and programs that "embody the City's commitment to meeting housing needs." The applicable housing goals, objectives and policies are as follows:

Goal 1:	A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy and affordable to people of all income levels, races, ages, and suitable for their various needs.
Objective 1.1:	Produce an adequate supply of rental and ownership housing in order to meet current and projected needs.
Policy 1.1.2:	Expand affordable rental housing for all income groups that need assistance.
Policy 1.1.3:	Facilitate new construction and preservation of a range of different housing types that address the particular needs of the city's households.
Policy 1.1.4:	Expand opportunities for residential development, particularly in designated Centers, Transit Oriented Districts and along Mixed-Use Boulevards.
Goal 2:	A City in which housing helps to create safe, livable and sustainable neighborhoods.
Objective 2.2:	Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit.
Policy 2.2.5:	Provide sufficient services and amenities to support the planned population while preserving the neighborhood for those currently there.
Objective 2.3:	Promote sustainable buildings, which minimize adverse effects on the environment and minimize the use of non-renewable resources.
Policy 2.3.2:	Promote and facilitate reduction of water consumption in new and existing housing.
Policy 2.3.3:	Promote and facilitate reduction of energy consumption in new and existing housing.

Policy 2.3.4: Promote and facilitate reduction of waste in construction and building operations.

Objective 2.4: Promote livable neighborhoods with a mix of housing types, quality design and a scale and character that respects unique residential neighborhoods in the City.

Policy 2.4.1: Promote preservation of neighborhood character in balance with facilitating new development.

The project is consistent with the above goals, objectives and policies because the project will provide 475 new live/work units, adding to the citywide housing supply for current and future residents of the Central City North Community Plan area within the Arts District area. Additionally, the project includes set aside for affordable units. The project will also expand commercial opportunities, with ground-floor, commercial uses along the Project's pedestrian paseo and frontages along Mateo Street and Santa Fe Avenue.

Therefore, as conditioned, the proposed vesting tract map is consistent with the intent and purpose of the applicable General and Community Plans.

(b) THE DESIGN AND IMPROVEMENT OF THE PROPOSED SUBDIVISION ARE CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

Section 66418 of the Subdivision Map Act defines the term "design" as follows: "Design" means: (1) street alignments, grades and widths; (2) drainage and sanitary facilities and utilities, including alignments and grades thereof; (3) location and size of all required easements and rights-of-way; (4) fire roads and firebreaks; (5) lot size and configuration; (6) traffic access; (7) grading; (8) land to be dedicated for park or recreational purposes; and (9) such other specific physical requirements in the plan and configuration of the entire subdivision as may be necessary to ensure consistency with, or implementation of, the general plan or any applicable specific plan. Further, Section 66427 of the Subdivision Map Act expressly states that the "Design and location of buildings are not part of the map review process for condominium, community apartment or stock cooperative projects."

Section 17.05-C of the Los Angeles Municipal Code enumerates design standards for Subdivisions and requires that each Tentative Map be designed in conformance with the Street Design Standards and in conformance to the General Plan. Section 17.05-C, third paragraph, further establishes that density calculations include the areas for residential use and areas designated for public uses, except for land set aside for street purposes ("net area"). The requested map meets the required components of a tentative map. The project site is not located in a flood zone, Very High Fire Hazard severity zone, or a landslide area.

The design and layout of the map is consistent with the design standards established by the Subdivision Map Act and Division of Land Regulations of the Los Angeles Municipal Code. Several public agencies (including the Bureau of Engineering, Bureau of Sanitation, Bureau of Street Lighting, Department of Water and Power, Fire Department, Department of Building and Safety, and Department of Transportation, Department of Recreation and Parks) have reviewed the map and found the subdivision design satisfactory and have imposed improvement requirements and/or conditions of approval. Sewers are available and have been inspected and deemed adequate in accommodating the proposed project's sewerage needs. Fire and traffic access, as well

as site grading, have been reviewed and deemed appropriate. Additional traffic improvement or control measures for adjacent roadways and nearby intersections have been included for traffic and pedestrian safety.

The subdivision will be required to comply with all regulations pertaining to grading, building permits, and street improvement permit requirements. Conditions of Approval for the design and improvement of the subdivision are required to be performed prior to the recordation of the tentative map, building permit, grading permit, or certificate of occupancy.

The proposed project includes a requested General Plan Amendment to change the land use designation of the Subject Property from Heavy Manufacturing to Regional Commercial, and includes a zone change to the corresponding C2 Zone. The proposed Regional Center Land Use Designation, including the proposed corresponding C2 Zone, permit commercial, mixed-use and residential development subject to a minimum lot area of 5,000 square feet. The project provides lot areas greater than the minimum.

Therefore, as conditioned, the design and improvement of the proposed subdivision is consistent with the intent and purpose of the applicable General Plan.

(c) THE SITE IS PHYSICALLY SUITABLE FOR THE PROPOSED TYPE OF DEVELOPMENT.

The subject property is located on a level, relatively flat, irregular parcel, comprised of four parcels located on a block bounded by 4th Place to the north, Santa Fe Avenue to the east, a former rail right-of-way to the south, and Mateo Street to the west. On the north side of the site, 4th Place rises along a viaduct to join the elevated roadway of 4th Street where it passes over Santa Fe Avenue. The former rail right-of-way along the south side of the site is undeveloped and separates the site from the adjacent industrial/commercial properties to the south, which front to the south on Palmetto Street. The project site's easterly boundary has an approximately 300-foot frontage along Santa Fe Avenue, its northern boundary, 4th Place is approximately 379.05 linear feet and its westerly boundary has an approximately 200-foot frontage along Mateo Street. The project site is legally described as a portion of Lots A (Arb 2) of Tract 35, and "Unnumbered Lot" (Arb 215) of Tract City Lands of Los Angeles. The project site is not located within a Methane Zone and would be not be subject to the requirements of the City Methane Requirements. The subject site is not located in any other hazardous zone but does contain known hazards (lead, arsenic, and PCBs). In order to ensure that potential impacts associated with excavation and grading of the Project Site to accommodate the project are reduced to a less than significant level, Mitigation Measure HAZ-MM-1 requires a complete Phase II Environmental Site Assessment to be performed to fully characterize the soils beneath the site following the demolition of the existing structure on-site and prior to the commencement of soil removal activities, and the implementation of all soil remediation and/or disposal recommendations contained within the complete Phase II report. The site is relatively level and is not located in a slope stability study area, high erosion hazard area, or Alquist-Priolo Fault Zone.

The site is in a substantially developed urban area. Surrounding properties are within the M3-1-RIO Zones. The property located to the north of the Subject Property and separated by the 4th Street bridge is within the M3-1-RIO Zone and improved with a one-story red brick industrial warehouse building. The property appears to be unoccupied. The properties located to the west of the Subject Property across Mateo Street are within the M3-1-RIO Zone and are improved with two-story concrete industrial buildings reutilized as live/work units, and are occupied by the Molino Street Lofts. The

properties located to the south of the Subject Property, are within the M3-1-RIO Zone, improved with one- to three-story industrial warehouse brick buildings. The property located to the east of the Subject Property, across Santa Fe Avenue, is within the M3-1-RIO Zone and is currently unimproved and unoccupied. However, a Determination Letter was issued on January 5, 2016 for the development of the site into a 98,825 SF, five-story office building.

The EIR prepared for the project identifies no potential adverse impacts on fish or wildlife resources. The project site, as well as the surrounding area are presently developed with residential, office, industrial and commercial structures and do not provide a natural habitat for either fish or wildlife. The project site is presently improved with an existing building and surface parking area and does not contain any natural open spaces, act as a wildlife corridor, contain riparian habitat, wetland habitat, migratory corridors, conflict with any protected tree ordinance, conflict with a Habitat Conservation Plan, nor possess any areas of significant biological resource value.

The tract has been approved contingent upon the satisfaction of the Department of Building and Safety, Grading Division prior to the recordation of the map and issuance of any permits. Therefore, the site will be physically suitable for the proposed type of development.

(d) THE SITE IS PHYSICALLY SUITABLE FOR THE PROPOSED DENSITY OF DEVELOPMENT.

The General Plan identifies (through its Community and Specific Plans) geographic locations where planned and anticipated densities are permitted. Zoning applying to subject sites throughout the City are allocated based on the type of land use, physical suitability, and population growth that is expected to occur.

The adopted Central City North Community Plan currently designates the subject property for a Heavy Manufacturing land use, corresponding to the M3 Zone. The site is zoned M3-1-RIO, which is consistent with its current land use designation. The applicant has requested a General Plan Amendment to the Central City North Community Plan from a Heavy Manufacturing to Regional Center Commercial land use designation and a Zone Change and Height District Change from M3-1-RIO to [T][Q]C2-2-RIO under Case No. CPC-2016-3853-GPA-ZC-ZAD-SPR. The requested Regional Center Commercial land use designation corresponds to the CR, C1.5, C2, C4, RAS3, RAS4, R3, R4, and R5 Zones. Thus, the requested C2 Zone would be consistent with the requested land use designation of Regional Commercial.

The requested C2-2-RIO Zone would permit a maximum floor area ratio (FAR) of 6:1. The net lot area of the site after dedications is 97,460 square feet. The total square footage of the site is limited to six times the net lot area, or buildable lot area. As such, the applicant would be permitted to construct a maximum 584,760 square-foot building. The project proposes a total of 584,760 square feet, or a 6:1 FAR and is thus consistent with the maximum allowable FAR of the proposed C2-2-RIO Zone. The proposed development of 584,760 total square feet is contingent upon the approval of CPC-2016-3853-GPA-ZC-ZAD-SPR. The LAMC does not limit the number of condominium units for commercial developments; however, the approval of the vesting tentative tract map limits the project to a total of 475 live/work commercial condominium units.

There are no known physical impediments or hazards that would be materially detrimental to the public welfare or injurious to the property or improvements in the same zone or vicinity in which the property is located. Therefore, the project site is physically

suitable for the proposed density of development.

(e) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SUBSTANTIAL ENVIRONMENTAL DAMAGE OR SUBSTANTIALLY AND AVOIDABLY INJURE FISH OR WILDLIFE OR THEIR HABITAT.

The EIR prepared for the project identifies no potential adverse impacts on fish or wildlife resources. The project site, as well as the surrounding area are presently developed with residential, office, industrial and commercial structures and do not provide a natural habitat for either fish or wildlife. The project site is presently improved with an existing building and surface parking area and does not contain any natural open spaces, act as a wildlife corridor, contain riparian habitat, wetland habitat, migratory corridors, conflict with any protected tree ordinance, conflict with a Habitat Conservation Plan, nor possess any areas of significant biological resource value. Therefore, the design of the subdivision would not cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.

(f) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SERIOUS PUBLIC HEALTH PROBLEMS.

The proposed subdivision and subsequent improvements are subject to the provisions of the Los Angeles Municipal Code (e.g., the Fire Code, Planning and Zoning Code, Health and Safety Code) and the Building Code. Other health and safety related requirements as mandated by law would apply where applicable to ensure the public health and welfare (e.g., asbestos abatement, seismic safety, flood hazard management).

The project is not located over a hazardous materials site, flood hazard area and is not located on unsuitable soil conditions. The project would not place any occupants or residents near a hazardous materials site or involve the use or transport of hazardous materials or substances.

The development is required to be connected to the City's sanitary sewer system, where the sewage will be directed to the Hyperion Treatment Plant, which has been upgraded to meet Statewide ocean discharge standards. The Bureau of Engineering has reported that the proposed subdivision does not violate the existing California Water Code because the subdivision will be connected to the public sewer system and will have only a minor incremental impact on the quality of the effluent from the Hyperion Treatment Plant. Additionally, the Project would lead to one significant and unmitigated cumulative significant impacts with respect to traffic. No adverse impacts to the public health or safety would occur as a result of the design and improvement of the site. Therefore, the design of the subdivision and the proposed improvements are not likely to cause serious public health problems.

(g) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS WILL NOT CONFLICT WITH EASEMENTS ACQUIRED BY THE PUBLIC AT LARGE FOR ACCESS THROUGH OR USE OF PROPERTY WITHIN THE PROPOSED SUBDIVISION.

There are no recorded instruments identifying easements encumbering the project site for the purpose of providing public access. The site is surrounded by private properties that adjoin improved public streets and sidewalks designed and improved for the specific purpose of providing public access throughout the area. The project site does not adjoin or provide access to a public resource, natural habitat, Public Park, or any officially

recognized public recreation area. Necessary public access for roads and utilities will be acquired by the City prior to recordation of the proposed map. Therefore, the design of the subdivision and the proposed improvements would not conflict with easements acquired by the public at large for access through or use of property within the proposed subdivision.

(h) THE DESIGN OF THE PROPOSED SUBDIVISION WILL PROVIDE, TO THE EXTENT FEASIBLE, FOR FUTURE PASSIVE OR NATURAL HEATING OR COOLING OPPORTUNITIES IN THE SUBDIVISION. (REF. SECTION 66473.1)

In assessing the feasibility of passive or natural heating or cooling opportunities in the proposed subdivision design, the applicant has prepared and submitted materials which consider the local climate, contours, configuration of the parcel(s) to be subdivided and other design and improvement requirements.

Providing for passive or natural heating or cooling opportunities will not result in reducing allowable densities or the percentage of a lot which may be occupied by a building or structure under applicable planning and zoning in effect at the time the tentative map was filed.

The topography of the site has been considered in the maximization of passive or natural heating and cooling opportunities.

In addition, prior to obtaining a building permit, the subdivider shall consider building construction techniques, such as overhanging eaves, location of windows, insulation, exhaust fans; planting of trees for shade purposes and the height of the buildings on the site in relation to adjacent development.

These findings shall apply to both the tentative and final maps for Vesting Tentative Tract Map No. 74529.