

I. Executive Summary

I. Executive Summary

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (EIR) contains a summary of the 2143 Violet Street Project (Project) and its potential environmental effects, along with a listing of the proposed Project design features and mitigation measures. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included herein are an overview of the purpose, focus, and organization of this Draft EIR; an overview of the Project; a brief discussion of areas of controversy; a description of the public review process to date for the Project; and a summary of the alternatives to the Project evaluated in this Draft EIR.

1. Purpose of this Draft EIR

As described in CEQA Guidelines Sections 15123(a) and 15362, an EIR is an informational document intended to inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this Draft EIR is to evaluate the Project's potential environmental effects that the City of Los Angeles (City), as the Lead Agency, has determined may be significant. Feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

This Draft EIR serves as the environmental document for all actions associated with the Project. This EIR is a "Project EIR" as defined by CEQA Guidelines Section 15161. Furthermore, this Draft EIR complies with CEQA Guidelines Section 15064, which addresses the significance determinations of the environmental effects caused by a project.

2. Draft EIR Focus and Effects Found Not to Be Significant

In accordance with CEQA Guidelines Section 15128, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and therefore were not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning

and Research, responsible agencies, and other interested parties on May 25, 2018, for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City determined through the Initial Study the potential for significant impacts in the following environmental issue areas:¹

- Air Quality
- Cultural Resources
- Energy²
- Geology and Soils—Paleontological Resources³
- Greenhouse Gas (GHG) Emissions
- Land Use
- Noise
- Public Services (including fire protection, police protection, schools, libraries, and parks and recreation)
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems (water supply, wastewater, and energy infrastructure)⁴

¹ At the time the NOP was issued, the Appendix G checklist did not include a category about Wildfire. Refer to Section 4, *Thresholds of Significance*, below for further details on the December 2018 updates to Appendix G. Wildfire impacts are addressed in Section VI, *Other CEQA*, of this Draft EIR.

² At the time the NOP was issued, the Appendix G checklist did not include a question about Energy Infrastructure. The Initial Study prepared for the Project did, however, note that energy would be evaluated in the Draft EIR in accordance with Appendix F of the CEQA Guidelines. Refer to Section 4, *Thresholds of Significance*, below for further details on the December 2018 updates to Appendix G.

³ At the time the NOP was issued, paleontological resources were evaluated under Cultural Resources. The Appendix G checklist now evaluates paleontological resources as part of Geology and Soils. Refer to Section 4, *Thresholds of Significance*, below for further details on the December 2018 updates to Appendix G.

In addition, the Initial Study identified potential impacts related to visual character and light/glare. However, subsequent to the publication of the Initial Study, it was determined the Project is located in a Transit Priority Area pursuant to Senate Bill (SB) 743 and City of Los Angeles Zoning Information (ZI) File No. 2452. SB 743 adds Public Resources Code (PRC) Section 21099, which provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center Project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.”⁵ A “transit priority area” is defined as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.”⁶ PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the A.M. and P.M. peak commute periods.”⁷

The Project proposes the construction of a mixed-use residential development consisting of 347 new live-work units, and approximately 187,374 square feet of new office space, 21,858 square feet of new commercial floor area, and a 926-square-foot community room that residents could use for art creation. Public transit service in the vicinity of the Project Site is currently provided by multiple local and regional bus lines, several of which provide connections to Downtown subway stations, including the Metro Red/Purple Lines Pershing Square Station and the Metro Red/Purple/Blue/Expo Lines 7th Street/Metro Center Station. In particular, the Los Angeles County Metropolitan Transportation Authority (Metro) provides a bus stop for Metro Local Line 60 located at the corner of South Santa Fe Avenue and Violet Street, which is the closest bus stop approximately 200 feet west of the Project Site. Other nearby transit lines include Metro Local Line 18, which provides service east/west from the City of Montebello to the Wilshire Center area, and Metro Local Line 62, which provides service from Downtown Los Angeles, east to Santa Fe Springs, and south to Hawaiian Gardens. A bus stop for both Local Lines 18 and 62 is located at 7th Street and Santa Fe Avenue, approximately 700 feet northwest of the Project Site. Additionally, the Greyhound Bus Terminal is located approximately 0.4 mile northwest of the Project Site on 7th Street, which provides inter-city bus service to various locations outside of the Los Angeles metropolitan area. Therefore, the Project is located in a TPA as defined in

⁴ *At the time the NOP was issued, the Appendix G checklist did not include a question about Energy Infrastructure. Refer to Section 4, Thresholds of Significance, below for further details on the December 2018 updates to Appendix G.*

⁵ *PRC Section 21099(d)(1).*

⁶ *PRC Section 21099(a)(7).*

⁷ *PRC Section 21064.3.*

PRC Section 21099 and confirmed by the City of Los Angeles Zone Information Map Access System (ZIMAS).⁸ As such, the Project's aesthetic and parking impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. Nevertheless, an analysis of the Project's potential aesthetics impacts is included in Section VI, Other CEQA Considerations, of this Draft EIR, for informational purposes only.

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to agricultural and forest resources; objectionable odors; biological resources; geology and soils (other than paleontological resources); hazards and hazardous materials; hydrology and water quality; physical division of an established community; conflict with an applicable conservation plan; mineral resources; airport or airstrip-related noise; population and housing; change in air traffic patterns; hazardous geometric design features; inadequate emergency access; storm water drainage; and solid waste. Therefore, these areas are not analyzed in this Draft EIR. The Initial Study demonstrating that no significant impacts would occur for these issue areas is included in Appendix A of this Draft EIR.

3. Draft EIR Organization

This Draft EIR is comprised of the following sections:

- I. **Executive Summary.** This section describes the purpose of this Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, Project summary, areas of controversy and issues to be resolved, public review process, summary of alternatives, and a summary of environmental impacts and mitigation measures.
- II. **Project Description.** This section describes the Project location, existing conditions, Project objectives, and characteristics of the Project.
- III. **Environmental Setting.** This section contains a description of the existing physical and built environment and a list of related projects anticipated to be built within the Project vicinity.
- IV. **Environmental Impact Analysis.** This section contains the environmental setting, Project and cumulative impact analyses, mitigation measures (where necessary), and conclusions regarding the level of significance after mitigation

⁸ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 2141 Violet Street, <http://zimas.lacity.org/>, accessed April 8, 2020. The address 2143 Violet Street is not listed in ZIMAS. However, the Project Site includes 2117-2147 E. Violet Street and 2118-2142 E. 7th Place.

for each of the following environmental issues: air quality; cultural resources; energy; greenhouse gas emissions; land use; noise; public services (fire protection, police protection, schools, parks and recreation, and libraries); transportation; tribal cultural resources; and utilities and service systems (water supply, wastewater, and energy infrastructure).

- V. Alternatives.** This section provides an analysis of a reasonable range of alternatives to the Project including: No Project/No Build Alternative; Zoning Compliant All Commercial Alternative; Reduced Density, FAR, and Programming Alternative; and the DTLA 2040 Community Plan Update Mixed-Use Alternative.
- VI. Other CEQA Considerations.** This section provides a discussion of significant unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the Project is also presented here. This section also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the Project's mitigation measures. Lastly, a summary of the possible effects of the Project that were determined not to be significant within the Initial Study is provided.
- VII. References.** This section lists the references and sources used in the preparation of this Draft EIR.
- VIII. Acronyms and Abbreviations.** This section provides a list of acronyms and abbreviations used in this Draft EIR.
- IX. List of Preparers.** This section lists the persons, public agencies, and organizations that were consulted or contributed to the preparation of this Draft EIR.

This Draft EIR includes following appendices that were used to prepare the environmental analysis for the Project:

- Appendix A—Initial Study, NOP, and NOP Comment Letters
 - Appendix A.1—Initial Study
 - Appendix A.2—NOP
 - Appendix A.3—NOP Comment Letters

- Appendix B—Technical Appendix for Air Quality and Greenhouse Gas Emissions
- Appendix C—Cultural Resources Appendix
 - Appendix C.1—Historical Resource Report
 - Appendix C.2—Archaeological Resources Memo
- Appendix D—Energy Calculations
- Appendix E—Utility Report
- Appendix F—Paleontological Records Search
- Appendix G—Land Use Consistency Tables
- Appendix H—Noise Calculation Worksheets
- Appendix I—LAFD Response Letter
- Appendix J—LAPD Response Letter
- Appendix K—LAUSD Response Letter
- Appendix L—DRP Response Letter
- Appendix M—LAPL Response Letter
- Appendix N—Transportation Appendix
 - Appendix N.1—Transportation Study
 - Appendix N.2—LADOT Assessment Letter
 - Appendix N.3—Construction Clarification Memo
- Appendix O—Tribal Cultural Resources Report
- Appendix P—Water Supply Assessment
- Appendix Q—Alternatives Traffic Analysis

4. Thresholds of Significance

In 2006, the City published the *L.A. CEQA Thresholds Guide* (Thresholds Guide) as a guidance document for preparing CEQA analyses for projects within the City. The Thresholds Guide includes two sets of criteria to evaluate project impacts: screening

criteria, which provide direction in determining the appropriate environmental document required for a project; and significance thresholds, which assist in determining whether a project's impacts generally would be significant under normal circumstances and would therefore require mitigation. Although intended as a voluntary tool, the Thresholds Guide offers a consistent set of evaluation criteria applicable to most discretionary projects in the City, and the Los Angeles Department of City Planning (DCP) has typically used both the screening criteria and significance thresholds as the basis for project analyses in its CEQA documents. However, the Thresholds Guide clearly indicates the Lead Agency—in this case, the DCP—retains the authority to determine significance thresholds on a case-by-case basis, dependent upon unique environments, evolving regulatory requirements, and the nature of each project. In addition, the Thresholds Guide states it is not intended as a substitute for the use of independent judgment to determine significance or the evaluation of the evidence in the record. Moreover, it states “because evaluation practices continue to evolve due to changing regulations, scientific methods, and court decisions, the project evaluator and lead City agency should always use the best information and evaluation methods available, including those from sources other than the Thresholds Guide.”⁹

In light of an evolving regulatory environment, recent case law, new topics such as greenhouse gas emissions and tribal cultural resources that are now addressed in Appendix G of the State CEQA Guidelines (Appendix G), and the age of the Thresholds Guide, the DCP has begun to update its CEQA guidance. At this point in time, the DCP has chosen to rely on the Appendix G questions as thresholds of significance. As noted above, the City has discretion in choosing appropriate significance thresholds. Therefore, throughout this Draft EIR, the thresholds contained in Appendix G are used. The factors and considerations set forth in the Thresholds Guide are utilized where appropriate to assist in answering the Appendix G threshold questions.

In January 2018, OPR proposed comprehensive updates to the CEQA Guidelines which revised thresholds for aesthetics, air quality, cultural resources, geology and soils, hydrology and water quality, land use and planning, noise, population and housing, transportation, and utilities and service systems. The update also added energy and wildfire questions to Appendix G. The updated CEQA Guidelines became effective on December 28, 2018 and are reflected throughout this Draft EIR.

5. Existing Project Site Conditions

The Project Site is located in the Arts District area of the City of Los Angeles (City), approximately 14 miles east of the Pacific Ocean. Primary regional access is provided by

⁹ *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, p. 3.*

the Hollywood Freeway (US-101), the Santa Monica Freeway (I-10), and the golden State Freeway (I-5), which are all accessible within less than 1 mile of the Project Site. Major arterials providing regional access to the Project Site include South Santa Fe Avenue, East 7th Street, East Olympic Boulevard, and South Alameda Street. The 96,523-square-foot (approximately 2.2-acre) Project Site is specifically bounded by East 7th Place to the north, East Violet Street to the south, an alley to the west, and properties to the east used primarily for parking. Further to the east are railroad tracks and the Los Angeles River.

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

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

The Project Site is also located within the East Los Angeles State Enterprise Zone, the Central Industrial Redevelopment Project area, and a TPA pursuant to SB 743 and ZI File No. 2452.

6. Description of the Proposed Project

a. Project Overview

The Project proposes a new mixed-use development on a 96,523 square-foot (2.2-acre) site located in Arts District. Proposed new uses would include 347 live-work units, of which five percent of the total proposed units (18 units) would be set aside for Extremely Low Income Households, and 11 percent of the total proposed units (39 units)

would be set aside for Very Low Income Households,, approximately 187,374 square feet of office space, square 21,858 feet of commercial retail/restaurant floor area, and 926-square-foot community room that residents could use for art creation. These new uses would be located in two new buildings: a 36-story residential tower with a maximum height of 425 feet located on the western portion of the Project Site, and an eight-story office building with a maximum height of 131 feet located on the eastern portion of the Project Site. In addition, five existing buildings within the northern portion of the Project Site that comprise approximately 56,686 square feet would be retained with office, retail, restaurant, warehouse, and six live-work units. Two buildings that comprise approximately 6,844 square feet and four live-work units, as well as two open sheds and surface parking spaces, would be removed. the City has recently issued permits for the conversion of approximately 5,055 square feet of existing retail and warehouse uses to restaurant uses.¹⁰ For purposes of providing a conservative evaluation of the Project, conversion of these uses is also accounted for as part of the Project. Upon completion, approximately 569,448 square feet of floor area would be located within the Project Site. The proposed uses would be supported by 828 parking spaces that would be distributed within six subterranean levels.

The existing commercial uses and six live-work units located within the northern portion of the Project Site along the Site's East 7th Place frontage would remain and would be linked to the two proposed new buildings to create a unified development via an extensive pedestrian paseo system that connects to each of the Project's street frontages, including the abutting alley. The ground level of the proposed residential tower would include retail/restaurant space, back of house uses (e.g., storage, equipment, etc.), and a residential lobby. Residential units, which range from one-bedroom units with approximately 598 square feet to three-bedroom units with approximately 1,045 square feet, would be located on Levels 2 through 36. Approximately 2,008 square feet of residential amenities would be located on Level 9 of the residential tower. Level 9 would also feature a pedestrian bridge that would connect the residential tower to Level 8 of the proposed office building and lead to additional residential amenities.

The ground level of the proposed office building includes retail/restaurant space oriented along Violet Street with a ground floor lobby entrance on East 7th Place, office space, and a 926-square-foot community room that residents could use for art creation. Levels 2 through 6 of the office building would contain approximately 150,000 square feet of office space. At Level 4, the height of the office building along the East 7th Place frontage is stepped back to create approximately 3,499 square feet of outdoor residential

¹⁰ *Los Angeles Department of Building and Safety Permit No. 16016-10000-14951 and Planning Case No. ZA-2017-1185-CUB allows for future restaurant use by an operator. As shown in Table III-1 of Section III Environmental Setting, of this Draft EIR, this is now included as Related Project No. 74.*

and office amenity space. Level 7 would contain approximately 25,111 square feet of office space and mechanical equipment. Level 8 would contain 7,593 square feet of indoor residential amenities that would be accessible via the pedestrian bridge from the residential tower, a pool, and approximately 28,063 square feet of outdoor residential and office amenity space.

The Project would require a General Plan Amendment to the Central City North Community Plan to change the land use designation from Heavy Industrial to Regional Center Commercial and a Vesting Zone and Height District Change from M3-1-RIO to C2-2-RIO.¹¹ Under the proposed General Plan Amendment, the Project would be required to comply with the construction labor standards for residency, wage, and training set forth in LAMC Section 11.5.6 B.2 and satisfy the requisite affordable housing provisions set forth in LAMC Section 11.5.11, both of which were added by Measure JJJ. LAMC Section 11.5.11 requires the Project to set aside a minimum of 5 percent of the total units for Extremely Low Income households and 11 percent of the total units for Very Low Income households. The proposed Zone and Height District Change would permit a maximum 6.0:1 FAR. With a buildable area of 94,946 square feet, a 6.0:1 FAR would permit a total of 569,448 square feet of floor area within the Project Site. As set forth above, the Project proposes a floor area of 569,448 square feet, which would not exceed the maximum 6.0:1 FAR.

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

b. Building Design

The Project design would create an active, transparent street edge along both Violet Street and East 7th Place through the placement of commercial uses, streetscape improvements, and integration with internal paseos and plazas. The contemporary architectural style of the proposed buildings would reflect the industrial character of the surrounding area by utilizing a repetition of stacked components to imitate the structural rhythm and cadence of stacked pallets. Materials used on the building exteriors would include concrete, glass, and metal. Each building level would be staggered to break up the

¹¹ *The proposed C2 zone and the proposed Regional Center Commercial land use designation permits density equivalent to the R5 (Multiple Residential) zone, or 1 dwelling unit per 200 square feet of lot area. Based on the requested Zone and Height Change and General Plan Amendment, the Project Site would be permitted a maximum of 475 dwelling units. The proposed total 347 live/work units is less than the number of residential units permitted within the proposed C2 zone.*

building façades, creating distinct and offset planes to reduce the building's perceived scale and massing, as well as large projection balconies that provide functional outdoor open space. Recessed window elements would be used to produce a pattern of void and solid, which would articulate the building facades, create texture, and reduce massing.

c. Open Space and Landscaping

The Project would incorporate open space and recreational amenities, particularly within the ground level, on Level 9 of the residential tower, and on Levels 4 and 8 of the office building. The primary open space amenity would be a ground-level pedestrian paseo that connects the existing buildings and the proposed buildings. This would consist of a central paseo between the proposed residential tower and office building featuring planters and various gathering spaces that would lead to Violet Street to the south and two smaller pedestrian corridors to the north. These smaller pedestrian corridors would contain art exhibition spaces, planters, and various seating areas, and would connect to East 7th Place to the north and the alleyway to the west.

Other open space and recreational amenities would include residential indoor common amenity spaces on Level 9 of the residential tower and on Level 8 of the office building, and outdoor amenities for both residents and office tenants on Levels 4 and 8 of the office building. Outdoor amenities are located on Levels 4 and 8 of the office building, these include a variety of amenities, a pool, and landscaped and programmed open space. In addition, private residential balconies would be dispersed throughout the residential tower. Based on the proposed dwelling unit types, the Project would be required to provide a total of 42,775 square feet of usable open space. The Project would provide approximately 71,719 square feet of open space, consisting of 54,369 square feet of common open space (e.g., swimming pool, lounge areas, fitness centers) and 17,350 square feet of private open space (e.g., patios, balconies) for its residents.

Landscaped planters containing trees and drought-tolerant plants would be installed throughout the ground-level pedestrian paseo system and within the outdoors spaces on Levels 4 and 8 of the office building. A total of 129 trees would be provided on the Project Site.

d. Access, Public Transit, and Parking

Vehicular access to the residential subterranean parking would be provided via a driveway accessible through the alleyway on the western side of the Project Site. Residential loading docks and loading area are located immediately south of the residential parking entrance. Vehicular access to the office subterranean parking would be provided via a driveway located at the southeastern corner of the Project Site along Violet Street.

Commercial loading dock and loading area are located immediately adjacent to the office parking entrance.

Pedestrian access would be provided from adjacent sidewalks. Internally, pedestrian access would be provided via a new paseo that connects the existing buildings with the proposed buildings. The entrance to the residential lobby would be located on the eastern side of the residential tower. Primary pedestrian access to the office component would be from an office lobby located along Violet Street within the northeastern corner of the Project site. Access to the retail/restaurant spaces would be provided via several entrances along the paseo system.

There are no existing bicycle facilities within 0.5 mile of the Project Site. However, the Project would provide 257 bicycle parking spaces (47 short-term and 210 long-term) as required by the LAMC. These parking spaces would be located within six subterranean parking levels.

Public transit service in the vicinity of the Project Site is currently provided by multiple local and regional bus lines, several of which provide connections to Downtown subway stations including Pershing Square and 7th Street/Metro Center. In particular, Metro provides a bus stop for Metro Local Line 60 located at the corner of South Santa Fe Avenue and Violet Street, which is the closest bus stop approximately 200 feet west of the Project Site.¹² Other nearby transit lines include Metro Local Line 18, which provides service east/west from the City of Montebello to the Wilshire Center area, and Metro Local Line 62, which provides service from Downtown Los Angeles, east to Santa Fe Springs, and south to Hawaiian Gardens. A bus stop for both Local Lines 18 and 62 is located at 7th Street and Santa Fe Avenue, approximately 700 feet northwest of the Project Site. Additionally, the Greyhound Bus Terminal is located approximately 0.4 mile northwest of the Project Site on 7th Street, which provides inter-city bus service to various locations outside of the Los Angeles.

Based on LAMC requirements for the proposed land uses and existing uses to remain, the Project would be required to provide 783 vehicle parking spaces. The Project would provide 828 vehicle parking spaces located within six subterranean parking levels. The Project would also comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking area.

¹² *Metro, Nextrip Service (Route 60 Downtown LA—Artesia Station via Long Beach, Stop: Santa Fe/Violet), www.metro.net/riding/nextrip/.*

e. Lighting and Signage

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

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

f. Sustainability Features

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

g. Anticipated Construction Schedule

Construction of the Project would commence with demolition of two of the existing industrial structures and the two open sheds. This phase would be followed by grading and excavation for the subterranean parking garage. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to begin in early 2021 and be completed early 2024. It is estimated that approximately 239,500 cubic yards of export material (e.g., concrete and asphalt surfaces) and soil would be hauled from the Project Site during the demolition and excavation phase.

h. Requested Permits and Approvals

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

- Pursuant to LAMC Section 11.5.6, General Plan Amendment to the Central City North Community Plan to change the land use designation from Heavy Industrial to Regional Center Commercial;
- Pursuant to LAMC Section 12.32 Q, a Vesting Zone and Height District Change from M3-1-RIO to C2-2-RIO;
- Pursuant to LAMC Section 12.24 T and 12.24 W.19, a Vesting Conditional Use Permit to permit floor area averaging and residential density transfer within a unified development;
- Pursuant to LAMC Section 12.24 W,1, a Master Conditional Use Permit for the on-site sale of a full-line of alcoholic beverages within 10 of the Project's commercial areas;
- Pursuant to LAMC Section 11.5.11 E (Measure JJJ) and Government Code Section 65915(k), an affordable housing development incentive to permit a zero-foot side yard in lieu of the 16 feet otherwise required for the residential levels along the eastern property line;
- Pursuant to LAMC Section 16.05, Site Plan Review for a maximum of 347 net new live-work units and a maximum of 210,158 square feet of net new non-residential floor area;
- Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map for the merger and re-subdivision of the Project Site into three (3) lots and for 353 residential and eight commercial condominiums and including Haul Route approval for 239,500 cubic yards of export;
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, Redevelopment Plan approvals, and building permits.

i. Project Objectives

CEQA Guidelines Section 15124(b) states that the project description shall contain “a statement of the objectives sought by the proposed project.” CEQA Guidelines Section 15124(b) further states that “the statement of objectives should include the underlying purpose of the project.” The underlying purpose of the Project is to redevelop vacant parcels into a high-density, mixed-use development that provides housing and jobs in the Arts District within the Central City North Community Plan area. The Project’s specific objectives are as follows:

- To support the Central City North Community Plan’s Objective 1-4 to promote and ensure the provision of adequate housing for all persons, by providing new market-rate and affordable live-work units in various types and configurations.
- To support the Central City North Community Plan Objective 2-1 to conserve and strengthen viable commercial development by retaining the existing retail/restaurant and office spaces, and developing new office space and new retail/restaurant space.
- To promote local and regional mobility objectives by providing a mix of residential and neighborhood-serving commercial and office uses in an area that is in close proximity to public transportation in order to reduce vehicular trips.
- To create a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of commercial uses on the ground floor level and the incorporation of a pedestrian paseo and courtyard/plaza to connect the existing uses with the new development.

7. Areas of Controversy

Potential areas of controversy and issues to be resolved by the City’s decision-makers may include those environmental issue areas where the potential for a significant and unavoidable impact has been identified. Based on the analysis in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with regard to on-site construction noise, on-site construction vibration associated with human annoyance, and vehicles miles traveled. Implementation of the Project would result in significant cumulative impacts that cannot be feasibly mitigated with regard to on-site construction noise and off-site operational noise.

8. Public Review Process

As previously indicated, the City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on May 28, 2018, for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR.

This Draft EIR is being circulated for a 45-day public comment period in accordance with CEQA requirements. Following the public comment period, a Final EIR will be prepared that will include responses to any comments raised regarding this Draft EIR.

9. Summary of Environmental Impacts

Table I-1 on page I-17 provides a summary of the Project's environmental impacts, which are summarized further in the sections that follow.

**Table I-1
Summary of Project Impacts**

Environmental Issue	Project Impact ^a
A. AIR QUALITY	
Conflicts with Applicable Air Quality Plans	Less Than Significant
Cumulative Emissions	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Sensitive Receptors	
<i>Construction</i>	
Regional Emissions	Less Than Significant
Localized Emissions	Less Than Significant
Toxic Air Contaminants	Less Than Significant
<i>Operation</i>	
Regional Emissions	Less Than Significant
Localized Emissions	Less Than Significant
Toxic Air Contaminants	Less Than Significant
Odors	Less Than Significant
B. CULTURAL RESOURCES	
Historic Resources	Less Than Significant
Archaeological Resources	Less Than Significant with Mitigation
C. ENERGY	
Construction	Less Than Significant
Operation	Less Than Significant
D. GEOLOGY AND SOILS	
Paleontological Resources	Less Than Significant with Mitigation
E. GREENHOUSE GAS EMISSIONS	
	Less Than Significant
F. LAND USE	
Physically Divide a Community	Less Than Significant
Conflict with Land Use Plans	Less Than Significant
G. NOISE	
Construction	
<i>On-Site Noise</i>	Significant and Unavoidable
<i>Cumulative On-Site Noise</i>	Significant and Unavoidable
<i>Off-Site Noise</i>	Less Than Significant
<i>On-Site Vibration (Building Damage)</i>	Less Than Significant with Mitigation
<i>On-Site Vibration (Human Annoyance)</i>	Significant and Unavoidable
<i>Off-Site Vibration (Building Damage)</i>	Less Than Significant
<i>Off-Site Vibration (Human Annoyance)</i>	Less Than Significant

Table I-1 (Continued)
Summary of Project Impacts

Environmental Issue	Project Impact ^a
Operation	
<i>On-Site Noise</i>	Less Than Significant
<i>Off-Site Noise</i>	Less Than Significant
<i>Cumulative Off-Site Noise</i>	Significant and Unavoidable
<i>Operational Vibration</i>	Less Than Significant
H. PUBLIC SERVICES	
Fire Protection	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Police Protection	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Schools	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Parks and Recreation	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Libraries	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
I. TRANSPORTATION	
Conflict with Plans	Less Than Significant
Vehicle Miles Traveled	Significant and Unavoidable
Hazardous Design Features	Less Than Significant
Emergency Access	Less Than Significant
J. TRIBAL CULTURAL RESOURCES	
	Less Than Significant
K. UTILITIES AND SERVICE SYSTEMS	
Water Supply and Infrastructure	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Wastewater	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Energy Infrastructure	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant

Table I-1 (Continued)
Summary of Project Impacts

Environmental Issue	Project Impact ^a
<p>^a <i>Cumulative impacts are listed separately if more severe than the corresponding Project impact or if the Project impact is significant and unavoidable but the cumulative impact is not.</i></p> <p>Source: <i>Eyestone Environmental, 2020.</i></p>	

a. Less Than Significant Impacts

(1) Air Quality

(a) Conflicts with Applicable Air Quality Plans

(i) SCAQMD CEQA Air Quality Handbook Policy Analysis

The following analysis addresses the Project's consistency with applicable SCAQMD and SCAG policies, inclusive of regulatory compliance. In accordance with the procedures established in SCAQMD's *CEQA Air Quality Handbook*, the following criteria are required to be addressed in order to determine the Project's consistency with applicable SCAQMD and SCAG policies:

- Would the project result in any of the following:
 - An increase in the frequency or severity of existing air quality violations; or
 - Cause or contribute to new air quality violations; or
 - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Would the project exceed the assumptions utilized in preparing the AQMP?
 - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
 - Does the Project include air quality mitigation measures; or
 - To what extent is Project development consistent with the AQMP control measures?

(1) Criterion 1

With respect to the first criterion, as discussed below, localized concentrations of NO₂ as NO_x, CO, PM₁₀, and PM_{2.5} have been analyzed for the Project. SO₂ emissions would be negligible during construction and long-term operations and, therefore, would not have the potential to cause or affect a violation of the SO₂ ambient air quality standard. Since VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. Due to the role VOCs play in O₃ formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established.

As shown in Table IV.A-5 in Section IV.A, Air Quality of this Draft EIR, and in the analysis below, the increases in PM₁₀ and PM_{2.5} emissions during construction would not exceed the SCAQMD-recommended significance thresholds at sensitive receptors in proximity to the Project Site. Additionally, the Project's maximum potential NO_x and CO daily emissions during construction were analyzed to ascertain potential effects on localized concentrations and to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard. As shown in Table IV.A-7 in Section IV.A, Air Quality of this Draft EIR, and in the analysis below, and detailed in Appendix B (CalEEMod Construction Output file) of this Draft EIR, **NO_x and CO would not exceed the SCAQMD-recommended localized significance thresholds. Therefore, Project construction would not result in a significant impact with regard to localized air quality.**

Because the Project would not introduce any substantial stationary sources of emissions (e.g., gasoline stations, dry cleaners, chrome plating operations), CO is the preferred benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations.¹³ As indicated below, no intersections would require a CO hotspot analysis, and impacts would be less than significant. **Therefore, the Project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations.**

An analysis of potential localized operational impacts from on-site activities was also conducted. As shown in Table IV.A-8 in Section IV.A, Air Quality of this Draft EIR, and in the analysis below, localized NO₂ as NO_x, CO, PM₁₀, and PM_{2.5} operational impacts would be less than significant. **Therefore, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants and would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.**

¹³ SCAQMD, *CEQA Air Quality Handbook*, 1993, Chapter 12, *Assessing Consistency with Applicable Regional Plans*.

(2) Criterion 2

With respect to the second criterion for determining consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2016–2040 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) Project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

- Is the project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2016 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the City of Los Angeles General Plan and SCAG's 2016–2040 RTP/SCS.

As described in Section IV.F, Land Use, of this Draft EIR, the General Plan of the City of Los Angeles serves as a comprehensive, long-term plan for future development of the City. Refer to the analysis below for a discussion of the Project's consistency with applicable goals, objectives, and policies of the City's General Plan Air Quality Element.

The 2016–2040 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. Economic assumptions, including employment rates and migration due to jobs, are also included as part of the 2016–2040 RTP/SCS forecast projections. According to the 2016–2040 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2018 is approximately 4,009,193 persons.¹⁴ In 2024, the projected year of full Project occupancy, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,172,886 persons.¹⁵ Based on a household size factor of 2.42 persons per household, the

¹⁴ *Based on a linear interpolation of 2012–2040 data.*

¹⁵ *Based on a linear interpolation of 2012–2040 data.*

Project is estimated to generate a residential population of 840 persons at full buildout.¹⁶ The estimated new residents generated by the Project would represent approximately 0.51 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2018 and 2024.¹⁷ Based on employee generation factors provided by the Los Angeles Unified School District, development of the Project would result in approximately 961 employment positions on the Project Site.¹⁸ According to the 2016–2040 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2018 is approximately 1,797,693 employees.¹⁹ In 2024, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,898,986 employees.²⁰ Thus, the Project’s estimated 961 employees would constitute approximately 0.95 percent of the employment growth forecasted between 2018 and 2024.²¹ **As similar population and employment projections form the basis of the 2016 AQMP, the Project would be consistent with the projections in the AQMP.** Refer to Section IV.F, Land Use, of this Draft EIR, for additional information regarding potential conflicts with the 2016–2040 RTP/SCS.

The Project Site is located in the Arts District area, which is undergoing rapid transformation with many mixed-use infill projects replacing industrial and warehousing uses. It is anticipated that the development of these mixed-use projects will increase population and housing within the Arts District area. Specifically, the Project is located within the Central City North Community Plan area, which encourages mixed-use developments along commercial corridors in the area.²² As discussed previously, the AQMP is based on the 2016–2040 RTP/SCS, which incorporates data from General Plans as well as local land use data, such as the Community Plan. While the Project would require a General Plan Amendment, Specific Plan, and Vesting Zone Change, as discussed above, the Project-related population and employment growth would be well

¹⁶ Based on a rate of 2.42 persons per multi-family unit based on the 2017 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.

¹⁷ $840 \div 163,693 = 0.51$ percent

¹⁸ LAUSD, *Developer Fee Justification Study*, March 2018, Table 14. Based on 0.00479 employee per square foot for Standard Commercial Office and 0.00271 employee per square foot for Neighborhood Shopping Centers, the Project’s 187,374 square feet of office uses, 21,858 square feet of retail restaurant uses, and 926 square feet of artist production space would result in 961 employees ($(187,374 * 0.00479) + (21,858 * 0.00271) + (926 * 0.00479) = 961$). The LAUSD Developer Fee Justification Study does not include an employee generation rate for artist production space. To provide a conservative estimate, the highest generation rate (i.e., Standard Commercial Office) was used.

¹⁹ Based on a linear interpolation of 2012–2040 data.

²⁰ Based on a linear interpolation of 2012–2040 data.

²¹ $961 \div 101,293 = 0.95$ percent

²² Goal 1, Objective 1-2.1 of the Central City North Community Plan.

within the Citywide growth projections. As such, the Project would be consistent with the growth projections in the AQMP.

- Does the project implement feasible air quality mitigation measures?

The Project would comply with all applicable regulatory standards (e.g., SCAQMD Rule 403, etc.) as required by SCAQMD, as summarized above. The Project also would incorporate project design features to support and promote environmental sustainability as discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. While these features are designed primarily to reduce GHG emissions, they would also serve to reduce the criteria air pollutants discussed herein. Furthermore, with compliance with the regulatory requirements identified above and in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, no significant air quality impacts would occur. Therefore, the Project is not required to implement air quality mitigation measures. **As such, the Project meets this AQMP consistency criterion.**

- To what extent is project development consistent with AQMP control measures?

With regard to land use developments, such as the Project, the 2016–2040 RTP/SCS land use control measures (i.e., goals and policies) focus on locating future growth within HQTAs and the reduction of vehicle trips and VMT.

As discussed in detail in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the 2016–2040 RTP/SCS includes, for the SCAG region as a whole, a daily 22.8 Total VMT per capita for the 2012 Base Year, and a daily 20.5 Total VMT per capita for the 2040 Plan Year. For Los Angeles County, the 2012 Base Year projected daily Total VMT per capita is 21.5 and 18.4 daily Total VMT per capita for the 2040 Plan Year. To analyze the Project's consistency with this aspect of the 2016–2040 RTP/SCS, the Project's Total Daily VMT was divided by the Project's service population to arrive at the Daily VMT per capita. As shown in Table IV.E-7 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project VMT per capita of 7.7 VMT per day for residents and 7.5 VMT per day for employees would be well below the Los Angeles County goals provided in the 2016–2040 RTP/SCS.

The Project represents an infill development within an existing urbanized area that would concentrate new residential, retail and office uses within a high-quality transit area (HQTA).²³ Therefore, the Project would be consistent with SCAG's 2016–2040 RTP/SCS

²³ *Defined by the 2016–2040 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.*

as it is located within an HQTAs. The Project would be designed and constructed with sustainability and transit orientation as guiding principles. Future rail transit service in the area would also include the West Santa Ana Branch corridor, which is currently being studied by Metro, including potential alignments along Alameda Street with potential station locations in the Arts District. Metro is also considering the potential extension of the Red and Purple Lines' revenue service to the east and south from Union Station to the Arts District, with potential stations at 3rd Street and 6th Street. The Project Site is also located approximately 1.5 miles from the Metro Gold Line Little Tokyo/Arts District Station. In addition, three Metro Local bus routes run within 0.25 mile of the Project Site, including Local Routes 18, 60 and 62. The Project would also provide required short- and long-term bicycle parking spaces in compliance with the requirements of the Los Angeles Municipal Code (LAMC). As further discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project design includes characteristics that would reduce trips and VMT as compared to a standard project within the Air Basin as measured by CalEEMod.²⁴ While these Project characteristics primarily reduce GHG emissions, they would also reduce criteria air pollutants discussed herein. These relative reductions in vehicle trips and VMT from a standard project within the Air Basin help quantify the criteria air pollutant emissions reductions achieved by locating the Project in any infill, HQTAs area that promotes alternative modes of transportation.

Previously, trip generation for land uses was calculated based on survey data collected by the Institute of Transportation Engineers (ITE). However, these ITE trip generation rates were based on data collected at suburban, single-use, free standing sites, which may not be representative of urban mixed-use environments. Beginning in 2019, the USEPA has sponsored a study to collect travel survey data from mixed-use developments in order provide a more representative trip generation rate for multi-use sites. Results of the USEPA survey indicate that trip generation and VMT are affected by factors such as resident and job density, availability of transit, and accessibility of biking and walking paths. Based on these factors, the USEPA has developed equations known as the EPA Mixed-Use Development (MXD) model to calculate trip reductions for multi-use developments.²⁵ The LADOT VMT Calculator incorporates the USEPA MXD model and accounts for project features such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites. As shown in Appendix B, incorporation of USEPA MXD VMT reduction features applicable to the Project results in a 23-percent reduction in overall VMT and resultant pollutant emissions compared to

²⁴ "Standard Project" refers to a Project that would be developed under statewide average conditions (assumed analogous to an ITE baseline). Consistent with statewide average conditions, this assumes that a development would not be located in an urban setting in close proximity to job centers or major transit stations.

²⁵ Environmental Protection Agency, *Mixed-Use Trip Generation Model*. www.epa.gov/smartgrowth/mixed-use-trip-generation-model, accessed on May 4, 2020.

baseline ITE trip generation rates. Furthermore, with implementation of Mitigation Measure TR-MM-1, implementation of a TDM program, the Project would result in a 28-percent reduction in overall VMT and associated emissions. As discussed above, using the LADOT VMT calculator, the Project daily per capita VMT is 7.7 miles for residents, which represents a reduction of 66 percent in daily per capita VMT when compared to the SCAG regional baseline of 22.8 daily per capita VMT. Project employee daily per capita VMT is 7.5 miles, which is a 67-percent reduction in comparison to SCAG baseline. This reduction in VMT is substantially better than the goals of the 2016–2040 RTP/SCS with an estimated 18-percent decrease in per capita GHG emissions from passenger vehicles by 2035 and 21-percent decrease in per capita GHG emissions from passenger vehicles by 2040.²⁶ Implementation of these sustainability features would contribute to a reduction in air quality emissions via a reduction in VMT. **Accordingly, as the Project would support SCAG’s and SCAQMD’s objectives of reducing VMT and the related vehicular air emissions, the Project is consistent with the control measures of the AQMP.**

In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of the Project on air quality in the Air Basin. The Project represents an infill development near transit within an existing urbanized area that would concentrate new residential, retail, and office uses within an HQTA, thus reducing VMT. The Project would not have a significant long-term impact on the region’s ability to meet State and federal air quality standards. The Project would comply with SCAQMD Rule 403 and would implement measures for control of NO_x, PM₁₀, and PM_{2.5}. The Project would also be consistent with the goals and policies of the AQMP for the control of fugitive dust. As discussed above, the Project would be consistent with the goals and policies of the AQMP.

(ii) City of Los Angeles Policies

The Air Quality Element of the City’s General Plan was adopted on November 24, 1992, and sets forth the goals, objectives, and policies, which guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City’s mobility and air quality goals.

To achieve the goals of the Air Quality Element, performance-based standards have been adopted to provide flexibility in implementation of its policies and objectives. The following Air Quality Element goals, objectives, and policies are relevant to the Project:

²⁶ CARB updated the SB 375 targets for the SCAG region, requiring a 19-percent decrease in VMT by 2035. Implementation of the 2016 RTP/SCS or the next plan is expected to fulfill and exceed the region’s obligations under SB 375 with respect to meeting the State’s VMT and related GHG emission reduction goals.

Goal 2—Less reliance on single-occupant vehicles with fewer commute and non-work trips.

Objective 2.1—It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.

Policy 2.1.1—Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce Vehicle Trips and/or Vehicle Miles Traveled (VMT) as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.

Goal 4—Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.

Objective 4.1—It is the objective of the City of Los Angeles to include regional attainment of ambient air quality standards as a primary consideration in land use planning.

Policy 4.1.1—Coordinate with all appropriate regional agencies in the implementation of strategies for the integration of land use, transportation, and air quality policies.

Objective 4.2—It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle miles traveled associated with land use patterns.

Policy 4.2.2—Improve accessibility for the City’s residents to places of employment, shopping centers, and other establishments.

Policy 4.2.3—Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

Policy 4.2.4—Require that air quality impacts be a consideration in the review and approval of all discretionary projects.

Policy 4.2.5—Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.

The Project would promote the City of Los Angeles General Plan Air Quality Element goals, objectives and policies discussed above in the regulatory framework. Specifically, the Project includes 257 bicycle parking spaces, consisting of 47 short-term spaces and 210 long-term spaces. The Project would provide opportunities for the use of

alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking to nearby destinations, such as the ROW DTLA and additional destinations including retail and restaurant uses in the northern part of the Arts District, thereby facilitating a reduction in VMT. In addition, the Project would be consistent with the developing land use pattern in the vicinity (i.e., Arts District) that features greater concentration of urban density along major arterials and near transit options. The Project also includes primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and within 0.5 mile of major transit stops. Additionally, as discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project would comply with the City's EV charging requirements which specifies that 10 percent of new parking spaces would require EV charging equipment. In addition, 30 percent of all new parking spaces would be required to be EV "ready" which will be capable of supporting future EV charging equipment.²⁷ Provisions of the EVSE and EV parking spaces would help to facilitate and encourage use of alternative fueled vehicles.

Based on the above, the Project is consistent with applicable policies of the City of Los Angeles Air Quality Element. Refer to Section IV.F, Land Use, of this Draft EIR, for an analysis of the Project's potential conflicts with the City's General Plan.

(iii) Conclusion

In conclusion, analysis of Threshold (a) was based on the Project's consistency with the AQMP, as well as the City of Los Angeles plans and policies. The determination of AQMP consistency is primarily concerned with the long-term influence of the Project on air quality in the Air Basin. As discussed above, the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any of the State and federal standards, the Project would also not delay the timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, because the Project is consistent with growth projections that form the basis of the 2016 AQMP, the Project would be consistent with the emissions forecasts in the AQMP. Furthermore, while the Project does not implement any air quality mitigation measures, the Project would comply with all applicable regulatory standards and would incorporate the project design features identified in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, that would serve to reduce the criteria air pollutants discussed herein. Additionally, as the Project would support the City of Los Angeles and SCAQMD's objectives of reducing VMT and the related vehicular air emissions, the Project would be consistent with AQMP control measures. **Thus, the Project would not conflict with or obstruct implementation of the AQMP. With regard**

²⁷ *City of Los Angeles Ordinance No. 186485. December 11, 2019.*

to City policies, as discussed above, the Project would serve to implement applicable policies of the City pertaining to air quality. Based on the above, impacts to Threshold (a) would be less than significant.

(b) Cumulatively Considerable Increases in Criteria Pollutants

(i) Regional Emissions

(1) Construction

Project construction would occur in sequential phases (e.g., demolition, then grading, then building construction), with buildout expected to be completed in 2024. Construction of the Project would commence with demolition of two of the existing industrial structures and open sheds. This phase would be followed by grading and excavation for the subterranean parking garage. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Approximately 239,500 cubic yards of export material (e.g., concrete and asphalt surfaces) and soil would be hauled from the Project Site during excavation.

Construction of the Project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from haul trucks and construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. Mobile source emissions, primarily NO_x, would result from the use of construction equipment, such as dozers, loaders, and cranes. During the finishing phase of the Project, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs. The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions. Construction assumptions, including construction schedule, heavy-duty construction equipment mix, and the number of employee and delivery and haul truck trips, are included in Appendix B (CalEEMod Construction Output file).

The emissions levels in Table IV.A-5 in Section IV.A, Air Quality, of this Draft EIR, represent the highest daily emissions projected to occur during each year of construction. As presented in Table IV.A-5, construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions) without mitigation would not exceed the SCAQMD daily significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}.

Therefore, regional construction emissions resulting from the Project would result in a less-than-significant impact.

(2) Operation

SCAQMD's CalEEMod was used to calculate regional area, energy, mobile source, and stationary emissions. The Project would incorporate project design features to support and promote environmental sustainability, as discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. While these features are designed primarily to reduce GHG emissions relative to a standard project as analyzed by CalEEMod within the Air Basin, the features would also likely serve to reduce relative criteria air pollutants discussed herein. For purposes of the air quality analysis, such project design features incorporated in this analysis include the Project Site's increase in accessibility to transit and increase in diversity of uses and density. In addition, as provided in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project includes Project Design Feature GHG-PDF-1, which requires incorporating a variety of sustainability features, including energy-efficient design methods and technologies such as a centralized chiller plant with rooftop ventilation, high performance window glazing, passive design and façade shading devices, high efficiency domestic water heaters, and enhanced insulation to minimize solar heat gain.

Table IV.A-6 in Section IV.A, Air Quality, of this Draft EIR, provides Project operational emissions. As discussed in Section II, Project Description, two buildings that comprise approximately 6,844 square feet and four live-work units, as well as two open sheds and surface parking spaces, would be removed while the remaining existing uses would be reconfigured. As a conservative assumption, the existing uses to be reconfigured and associated operational emissions were accounted for as part of the Project. Existing credit was not taken for the four live-work units removed with the Project. As shown in Table IV.A-6, regional emissions resulting from operation of the Project would not exceed any of SCAQMD's daily regional operational thresholds.

Therefore, regional operational emissions resulting from the Project would result in a less-than-significant impact.

(ii) Localized Emissions

(1) Construction

Project-related localized construction impacts are evaluated based on SCAQMD LST methodology which takes into account ambient pollutant concentrations. Based on SCAQMD methodology, localized emissions which exceed LSTs would also cause an exceedance of ambient air quality standards. As analyzed in Threshold (c) below, Project-related construction emissions would not exceed localized thresholds. **Therefore, localized construction emissions resulting from the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Localized construction emissions resulting from the Project would result in a less-than-significant air quality impact.**

(2) Operation

Project-related operational emissions were also evaluated based on SCAQMD LST methodology from on-site sources (e.g., water heaters, cooking appliances, HVAC). The potential to cause or contribute to CO hotspots (potential exceedances of ambient air quality standards) from post-construction motor vehicle operations was also evaluated. As analyzed in Threshold (c) below, Project-related operational emissions from on-site and off-site sources would not exceed localized thresholds. **Therefore, localized operational emissions resulting from the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Localized operational emissions resulting from the Project would result in a less-than-significant air quality impact.**

(iii) Conclusion

According to SCAQMD guidance, individual projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would have a cumulatively considerable contribution to emissions for those pollutants for which the Air Basin is in non-attainment. As shown in Tables IV.A-5 and IV.A-6 in Section IV.A, Air Quality, of this Draft EIR, respectively, Project construction and operational daily emissions at the Project Site would not exceed any of SCAQMD's regional thresholds, respectively. Therefore, the Project's contribution to cumulative construction-related and operation-related regional emissions would not be cumulatively considerable and, therefore, would be less than significant. In addition, construction and operational emissions from the Project would not exceed any of SCAQMD's localized significance thresholds at Project buildout, as shown in Tables IV.A-7 and IV.A-8 in Section IV.A, Air Quality, of this Draft EIR, respectively, below. Thus, construction and operation of the Project would have less-than-significant impacts with regard to localized emissions as well. **Therefore, the Project's contribution to localized cumulative air quality impacts also would not be cumulatively considerable and, thus, would be less than significant.**

(c) Exposure of Sensitive Receptors to Substantial Pollutant Concentrations

(i) Construction

(1) On-Site Construction Activities (Criteria Pollutants)

The localized construction air quality analysis was conducted using the methodology promulgated by SCAQMD. Look-up tables provided by SCAQMD were used to determine localized construction emissions thresholds for the Project.²⁸ LSTs represent the maximum

²⁸ SCAQMD, *LST Methodology Appendix C—Mass Rate LST Look-Up Table*, revised October 2009.

emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are based on the most recent background ambient air quality monitoring data (2016–2018) for the Project area presented in Table IV.A-2 in Section IV.A, Air Quality of this Draft EIR. Although the trend shown therein demonstrates that ambient air quality is improving in the area, the localized construction emissions analysis conservatively did not apply an expected reduction in background pollutant concentrations for subsequent years of construction (i.e., 2021–2024). By doing so, the allowable exceedance of an ambient air quality standard is more stringent, thus making this analysis more conservative. The analysis is based on existing background ambient air quality monitoring data (2016–2018).

Maximum on-site daily construction emissions for NO_x, CO, PM₁₀, and PM_{2.5} were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for SRA 1 based on a 2.2-acre site. Potential impacts were evaluated at the closest off-site sensitive receptor, which are residential uses located to the south, approximately 20 meters from the Project Site. Ambient air quality standards for NO_x and CO have averaging times of 1-hour and 8-hour respectively. The localized analysis also takes into account non-residential (commercial) uses at which sensitive individuals may reside for short durations (1 to 8 hours). The closest receptor distance on the SCAQMD mass rate LST look-up tables is 25 meters. Based on SCAQMD LST methodology, projects with boundaries located closer than 25 meters to the nearest receptor (such as the Project) should use the LSTs for receptors located at 25 meters.²⁹

The maximum daily localized emissions from Project construction and LSTs are presented in Table IV.A-7 of Section IV.A, Air Quality, of this Draft EIR. As presented therein, maximum construction emissions would not exceed the SCAQMD localized screening thresholds; therefore, **impacts would be less than significant impact with regard to localized emissions.**

(2) Off-Site Construction Activities (CO “Hot Spots” Analysis)

Consistent with the CO methodology above, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis.

The highest average daily trips at an intersection under the Existing Condition would be approximately 36,300 vehicles per day at the 7th Street and South Alameda Street intersection.³⁰ Project construction would result in a maximum of 1,044 passenger car

²⁹ SCAQMD, *Final Localized Significance Threshold Methodology*, revised July 2008.

³⁰ Assumes that maximum hour intersection volumes represent 10 percent of the daily volumes.

equivalent (PCE) trips per day, which includes employee, delivery, and haul truck trips during building construction.³¹

Conservatively assuming that all of the Project construction would drive through this intersection, it would result in approximately 37,344 vehicles per day, which is significantly below the daily traffic volumes of 400,000 vehicles per day that would be expected to generate CO exceedances as evaluated in the 2003 AQMP. This daily trip estimate is based on the peak hour conditions of the intersection. **The Project off-site construction activities, including the highest average daily trips, would not expose sensitive receptors to substantial CO concentrations. As a result, impacts related to localized construction mobile-source CO emissions are considered less than significant**

(3) Off-Site Construction Activities (Toxic Air Contaminants)

The greatest potential for TAC emissions during construction would be from diesel particulate emissions associated with heavy equipment operations. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" 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 four years, the Project would not result in a long-term (i.e., 70-year) source of TAC emissions. Additionally, SCAQMD's CEQA guidance does not require a health risk assessment (HRA) for short-term construction emissions. It is, therefore, not necessary to evaluate long-term cancer impacts from construction activities, which occur over a relatively short duration. **The Project construction activities, including generation of TACs, would not expose sensitive receptors to substantial pollutant concentrations. Project-related TAC impacts during construction would be less than significant.**

(ii) Operation

(1) On-Site Operational Activities (Criteria Pollutants)

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. Emissions estimates for criteria air pollutants from on-site sources are presented in Table IV.A-8 in Section IV.A, Air Quality, of this Draft EIR. The SCAQMD LST mass rate look-up tables were used to evaluate potential localized impacts. As shown in Table IV.A-8, on-site operational emissions would not exceed any of the LSTs. **The**

³¹ *Fehr and Peers Transportation Impact Study for the 2143 Violet Street, City of Los Angeles, October 2018.*

Project on-site operational activities, including generation of criteria pollutants, would not expose sensitive receptors to substantial pollutant concentrations. Therefore, localized operational emissions resulting from the Project would result in a less-than-significant air quality impact.

(2) Off-Site Operational Activities (CO “Hot Spots” Analysis)

Consistent with the CO methodology above, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis.

At buildout of the Project, the highest average daily trips at an intersection would be approximately 60,000 vehicles per day at the 7th Street and Alameda Street,³² which is below the daily traffic volumes of 400,000 vehicles per day that would be expected to generate CO exceedances as evaluated in the 2003 AQMP.³³ This daily trip estimate is based on the peak hour conditions of the intersection. There is no reason unique to the Air Basin meteorology to conclude that the CO concentrations at the 7th Street and Alameda Street intersection would exceed the 1-hour CO standard if modeled in detail, based on the studies undertaken for the 2003 AQMP. In addition, CO background concentrations within the vicinity of the modeled intersection have substantially decreased since preparation of the 2003 AQMP primarily due to ongoing fleet turn over of older on-road light duty vehicles and cleaner fuels.³⁴ In 2003, the 1-hour background CO concentration was 5 ppm and has decreased to 2 ppm in 2018.³⁵ Therefore, the Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots. The supporting data for this analysis is included in Appendix B of this Draft EIR. **The Project off-site operational activities, including the highest average daily trips, would not expose sensitive receptors to substantial CO concentrations. As a result, impacts related to localized mobile-source CO emissions are considered less than significant.**

³² Assumes that peak hour intersection volumes represent 10 percent of the daily volumes.

³³ The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.

³⁴ SCAQMD, Carbon Monoxide Redesignation Request and Maintenance Plan, February 2005.

³⁵ SCAQMD, 2018 Air Quality Data Table.

(3) Toxic Air Contaminants

(a) On-Site Sources

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit TACs. CARB has published and adopted the *Air Quality and Land Use Handbook: A Community Health Perspective*, which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).³⁶ SCAQMD adopted similar recommendations in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*.³⁷ Together, CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

The primary sources of potential air toxics associated with Project operations include DPM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and to a lesser extent facility operations (e.g., natural gas fired boilers). However, these activities, and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions based on review of the air toxic sources listed in SCAQMD's and CARB's guidelines.

The Project would only result in minimal emissions of TACs from the use of consumer products and landscape maintenance activities, among other things. As a result, toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the proposed Project.

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The Project would not include these types of potential industrial manufacturing process sources. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides, etc.) for the types of proposed land uses would be below thresholds warranting further study under the California Accidental Release Program (CalARP).

³⁶ CARB, *Air Quality and Land Use Handbook, a Community Health Perspective*, April 2005.

³⁷ SCAQMD, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, May 6, 2005.

As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of ten in 1 million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

(b) Off-Site Sources

As discussed above, the CARB Land Use Handbook recommends buffer distances between sensitive uses and certain sources of TACs. An initial search was performed using the SCAQMD FIND database which contains public information about SCAQMD-regulated facilities required to have an air permit. A FIND search was conducted in the vicinity of the Project site which indicated that no major sources of TACs are located within 0.25 mile of the Project Site. Minor emissions sources such as boilers or emergency generators are located within the Project vicinity, but the CARB Land Use Handbook does not identify these as major sources of TACs.

The CARB Land Use Handbook also identifies a buffer distance of 1 mile for major rail yards. The Union Pacific Los Angeles Transportation Center (LATC) rail yard is located approximately 1.7 miles northeast of the Project Site, greater than the 1-mile buffer distance recommended by CARB. Sources of TAC emissions at the LATC rail yard include diesel exhaust from locomotives and heavy duty trucks transporting cargo to and from the site. A Metro rail yard (Division 20) is located approximately 0.6 mile north of the Project Site. This rail yard is currently used for maintenance of the Metro Red/Purple lines, which are subway trains powered by electricity. Sources of TAC emissions from the Metro rail yard would be minimal as trains at this yard are powered by electric propulsion and would not generate emissions on-site.³⁸ Therefore, emissions and other TACs from this rail yard are not expected to affect future on-site sensitive receptors.

As discussed previously, a search of the SCAQMD FIND database did not show any permitted sources of TACs in the Project vicinity. Also, a site survey was performed to identify non-permitted sources of TACs. The site survey did not identify any sources of TACs in the Project vicinity.

As the Project would not place sensitive uses near substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of future on-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of ten in 1

³⁸ Los Angeles County Metropolitan Transportation Authority, *Division 20 Portal Widening and Turnback Facility Project Final Environmental Impact Report, September 2018.*

million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

Based on the above, impacts would be less than significant.

(d) Generation of Odors

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and in the Initial Study prepared for the Project, which is included as Appendix A of this Draft EIR, the Project would not create or result in other emissions, such as those leading to objectionable odors, that may impact a substantial number of people. **Impacts would be less than significant.**

(2) Cultural Resources

(a) Historical Resources

(i) Direct Impacts

The Project would demolish Buildings D, E, F, and H in order to develop the proposed residential, office, and retail/restaurant uses on the Project Site. However, these buildings are not historical resources defined by CEQA. Therefore, the demolition of these buildings would not cause a direct impact to historical resources.

As discussed under Subsection 2.b.(1)(c) in Section IV.B, Cultural Resources, of this Draft EIR, there is one historical resource on the Project Site. Building C (front building at 2140 E. 7th Place) was previously identified by SurveyLA as a historical resource. Therefore, potential direct impacts on Building C are discussed below.

The proposed Project design would retain the pedestrian-level, street-facing setting of Buildings A, B, and C along East 7th Place to the driveway along the eastern side of Building C. These buildings would be incorporated into the overall Project, retaining the fabric of the neighborhood, and no changes are proposed to the use of these buildings as live-work lofts. The proposed Project design is compatible with Building C, which, as noted above, is being treated as a historical resource for purposes of this analysis. The proposed Project design is also compatible with the existing streetscape along East 7th Place. The buildings that would be retained do not exceed three stories in height. At East 7th Place, new construction would be three stories in height and step back to eight stories at the rear portion. Both new buildings would be physically separated from the older buildings that would be retained. The proposed Project would integrate new construction with design sympathetic to existing building heights and irregular site plans. Therefore, the proposed

Project would not cause a direct impact to the setting of the existing buildings, including Building C.

Based on the above, the Project would not directly cause a substantial adverse change in the significance of a historical resource.

(ii) Indirect Impacts

Potential indirect impacts were also analyzed to determine if the Project would cause a “material impairment” to the significance of the three identified historical resources in the study area. Material impairment would occur if a project demolishes or alters the physical characteristics that convey the significance of a historical resource and that justify its inclusion in or eligibility for inclusion in national, state, or local landmark or historic district programs pursuant to the requirements of CEQA. Such an effect would only occur if the historical resources in the study area no longer retained sufficient integrity to convey their significance as a result of the Project.

As discussed above, there are seven aspects of integrity: feeling, association, workmanship, location, design, setting, and materials. Because the Project would not alter the physical features of the historical resources in the study area, the only relevant aspect with respect to the indirect impact of the new buildings on these historical resources is setting. Setting refers to the character of the place in which the historical resource is situated within the boundaries of the property or historic district as well as the resource’s broader surroundings. The analysis of indirect impacts considers whether the integrity of setting of the historical resources in the study area would be diminished by the new construction to the degree they would no longer qualify as historical resources under national, state, or local landmark or historic district programs.

The Project would construct a 36-story residential tower and an eight-story office building on the Project Site. Development of the residential tower would introduce a new visual element to the setting of the identified historical resources. However, the overall integrity of setting in the study area is relatively low due to the substantial amount of development occurring in the study area. Thus, new construction on the Project Site would not cause further impairment of the integrity of setting of the identified historical resources. In addition, the Project is physically separated from all of the identified historical resources. Because the physical distance between these historical resources and the Project site would be maintained, the relationship of the buildings to the streetscape would remain intact and would not be altered by the Project. The Project does not share street frontage with any of the historical resources in the study area and would not have the potential to obstruct views of the historical resources in the study area. Although the Project introduces a new visual element to the area east of these historical resources, the relationships between the buildings, other significant features, and surrounding streets would remain

largely intact overall. Furthermore, although the Project would cast shadows to the study area, these shadows would not alter the physical features of the historical resources in the study area, and no publicly visible elevations of the historical resources would be physically obscured by the Project. Therefore, the Project would not have any impact on the physical characteristics that convey the historic significance of the three identified historical resources and justify their inclusion in, or eligibility for, applicable landmark and historic district designation programs. **As such, the Project would not indirectly cause a substantial adverse change in the significance of a historical resource.**

Based on the above, and as discussed in more detail in the Historical Resource Report, the demolition of existing buildings on the Project Site and the construction of the two proposed buildings would not directly or indirectly cause a change in the significance of a historical resource as defined in Section 15064.5. Therefore, impacts to historical resources would be less than significant.

(b) Human Remains

The Project Site is located within an urbanized area and has been subject to previous grading and development. Furthermore, no known traditional burial sites have been identified on the Project Site. If human remains were discovered during construction of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.91 and 5097.98, as amended. **With the implementation of regulatory requirements, the Project would not disturb any human remains. Impacts related to human remains would be less than significant.**

(3) Energy

(a) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

The Draft EIR analysis considers the eight criteria identified in the Thresholds of Significance subsection in Section IV.C, Energy to determine whether this significance threshold would be exceeded.

- (i) 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*

The Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas

consumption, and transportation fuels, such as diesel and gasoline. The analysis below includes the Project's energy requirements and energy use efficiencies by fuel type for each stage of the Project (construction, operations, maintenance, and removal activities).³⁹

For purposes of this analysis, Project maintenance would include activities, such as repair of structures, landscaping and architectural coatings. Energy usage related to Project maintenance activities are assumed to be included as part of Project operations. Project removal activities of the structures constructed under this Project would include demolition or abandonment of the Project Site. However, it is not known when the Project would be removed. Therefore, analysis of energy usage related to Project removal activities would be speculative. For this reason, energy usage related to Project removal was not analyzed.

(1) Construction

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. As discussed below, construction activities, including the demolition of existing structures, construction of new buildings, and facilities, typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities).

As shown in Table IV.C-1 in Section IV.C, Energy, of this Draft EIR, a total of 64.7 MWh of electricity, 147,727 gallons of gasoline, and 351,168 gallons of diesel is estimated to be consumed during Project construction.

(a) Electricity

During construction of the Project, electricity would be consumed to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Electricity would be supplied to the Project Site by existing electrical services within the Project Site and would not affect other services.

³⁹ *Removal activities relate to the life of a project.*

As shown in Table IV.C-1, a total of approximately 64,697 kWh of electricity is anticipated to be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (longer than 120 days) providing illumination for the site and staging areas would also comply with applicable Title 24 requirements, which includes limits on the wattage allowed per specific area, which result in the conservation of energy.⁴⁰ As such, the demand for electricity during construction would not cause wasteful, inefficient, and unnecessary use of energy.

The estimated construction electricity usage represents approximately one percent of the estimated net annual operational demand, which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP.⁴¹ Moreover, construction electricity usage would replace some of the existing electricity usage at the Project Site during construction.

(b) Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus, there would be no demand generated by construction.

(c) Transportation Energy

The petroleum-based fuel use summary provided in Table IV.C-1 in Section IV.C, Energy, of this Draft EIR, represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions, provided in Appendix D, of this Draft EIR. As shown, on- and off-road vehicles would consume an estimated 147,727 gallons of gasoline and approximately 351,168 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.002 percent of the 2024 annual on-road gasoline-related energy consumption and

⁴⁰ *California Building Energy Efficiency Standards, Title 24, Part 6, §110.9, §130.0, and §130.2.*

⁴¹ *The percentage is derived by taking the total amount of electricity usage during construction (64,697 kWh) and dividing that number by the total amount of net electricity usage during operation (5,996,153 kWh) to arrive at 1 percent.*

0.03 percent of the 2024 annual diesel fuel-related energy consumption in Los Angeles County, as shown in Appendix D, of this Draft EIR.

Trucks and equipment used during proposed construction activities would comply with CARB's anti-idling regulations, as well as the In-Use Off-Road Diesel-Fueled Fleets regulation.⁴² In addition to reducing criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy and reduce fuel consumption. Anti-idling regulations would limit the amount of fuel wasted in equipment and trucks that are not in operation. Emissions regulations to control DPM and NOx emissions would require that engines be more efficient, which results in reduced fuel consumption. In addition, on-road vehicles (i.e., haul trucks, worker vehicles) would be subject to Federal fuel efficiency requirements. Therefore, Project construction activities would comply with existing energy standards with regard to transportation fuel consumption. As such, the demand for petroleum-based fuel during construction would not cause wasteful, inefficient, and unnecessary use of energy.

(d) Construction Materials

The energy analysis does not include a full life cycle analysis of energy usage that would occur over the production/transport of materials used during the construction of the Project or used during the operational life of the Project, or the end of life for the materials and processes that would occur as an indirect result of the Project. Estimating the energy usage associated with these processes would be too speculative for meaningful consideration, would require analysis beyond the current state-of-the-art in impact assessment, and may lead to a false or misleading level of precision in reporting. Manufacture and transport of materials related to Project construction and operation are expected to be regulated under regulatory energy efficiency requirements. Therefore, it is assumed that energy usage related to construction and operational materials would be consistent with current regulatory requirements regarding energy usage

⁴² *The Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (Title 13, California Code of Regulations, Division 3, Chapter 10, Section 2485) was primarily adopted to reduce diesel air toxic pollutant emissions from heavy-duty trucks but also indirectly encourages the use of petroleum-based fuel in a more efficient manner by not allowing diesel trucks to idle for greater than 5 minutes at any location. The Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles (Title 13, CCR, Division 3, Chapter 1, Section 2025) was primarily adopted to reduce pollutant emissions but also indirectly encourages the use of petroleum-based fuel in a more efficient manner by requiring retirement, replacement, or repower of older less efficient, dirtier engines.*

(2) Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to, heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. As shown in Table IV.C-2 of Section IV.C, Energy, of this Draft EIR, the Project's net new energy demand would be approximately 5,996 MWh of electricity per year, 9,294,200 cf of natural gas per year, 681,701 gallons of gasoline per year, and 124,347 gallons of diesel fuel per year.

(a) Electricity

As shown in Table IV.C-2 in Section IV.C, Energy, of this Draft EIR, with compliance with 2019 Title 24 standards and applicable 2019 CALGreen requirements, buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 5,996 MWh per year. In addition to complying with CALGreen Code requirements, the Applicant would also implement GHG-PDF-1 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, which states that the design of new buildings would include features so as to be capable of exceeding Title 24 energy efficiency requirements, use of Energy Star-labeled appliances, a reduction of indoor water use by at least 20 percent, use of plumbing fixtures and fitting that exceed the performance requirements specified in the LAMC, and use of a weather-based irrigation system and water efficient landscaping with use of drought tolerant plants in up to 60 percent of the proposed landscaping. These measures would further reduce the Project's energy demand. It should be noted that the CalEEMod energy (electricity and natural gas) calculations are based on 2016 Title 24 energy efficiency standards and has not been updated to 2019 Title 24 standards. This analysis conservatively includes a 10-percent reduction in the CalEEMod calculated energy use to account for compliance with 2019 Title 24 standards.

In addition, LADWP is required to procure at least 33 percent of their energy portfolio from renewable sources by 2020. The current sources procured by LADWP include wind, solar, and geothermal sources. These sources account for 32 percent of LADWP's overall energy mix in 2018, the most recent year for which data are available.⁴³ This represents the available off-site renewable sources of energy that would meet the Project's energy demand. The use of renewable energy would indirectly reduce use of fossil fuels required for electricity generation (e.g., natural gas, coal, oil). While the electricity usage rate for a given land use would not be directly affected by the availability of

⁴³ CEC, 2018 Power Content Label, Los Angeles Department of Water and Power, July 2019.

renewable energy, the consumption of fossil fuels required for electricity generation would be reduced.

Furthermore, the Project would comply with Section 110.10 of Title 24, which includes mandatory requirements for solar-ready buildings and, as such, would not preclude the potential use of alternate fuels.

Based on LADWP's 2017 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2024–2025 fiscal year (the Project's buildout year) will be 23,286 GWh of electricity.^{44,45} As such, the Project-related net increase in annual electricity consumption of 5,996 MWh per year would represent less than 0.03 percent of LADWP's projected sales in 2024. In addition, as previously described, the Project would incorporate a variety of energy conservation measures to reduce energy usage.

(b) Natural Gas

As provided in Table IV.C-2 in Section IV.C, Energy, of this Draft EIR, with compliance with 2019 Title 24 standards and applicable 2019 CALGreen Code requirements, buildout of the Project is projected to generate a net increase in the on-site demand for natural gas totaling approximately 9,294,200 cf per year. As discussed above, in addition to complying with applicable regulatory requirements regarding energy conservation (e.g., California Building Energy Efficiency Standards and CALGreen Code), the Project would implement project design features to further reduce energy use. The Project would implement GHG-PDF-1 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, which would include features so as to be capable of exceeding Title 24 energy efficiency requirements by implementing conservation features to reduce natural gas usage. In order to meet the energy performance requirement, the Project may include use of efficient water heaters, cooking equipment and other major support appliances.

As stated above, the Project's estimated net increase in demand for natural gas is 9,294,200 cf per year, which translates to 25,464 cf per day. Based on the 2018 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2.47 billion cf per day in 2024 (the Project's buildout year).⁴⁶ The Project would account for approximately 0.001 percent of

⁴⁴ LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

⁴⁵ LADWP, 2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A, Table A-1.

⁴⁶ California Gas and Electric Utilities, 2018 California Gas Report p. 100. Interpolated between 2025 and 2030 estimates.

the 2024 forecasted consumption in SoCalGas' planning area. In addition, as also previously described, the Project would incorporate a variety of energy conservation measures to reduce energy usage.

(c) Transportation Energy

Based on the Project trip-generation estimates provided in Section IV.I, Transportation, of this Draft EIR, the Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. The Project Site is located in an HQTAs designated by SCAG, which indicates that the Project Site is an appropriate site for increased density and employment opportunities from a "smart growth," regional planning perspective.⁴⁷ As discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project Site is located within 0.25 mile of three Metro Local bus routes with stops along Santa Fe Avenue and 7th Street, including a stop adjacent to the Project Site on Santa Fe Avenue. Metro Rapid 720 bus route runs within 0.5 mile of the Project Site, with a stop at the corner of 7th Street and Decatur Street. The Project Site is also located 1.5 miles from the Metro Gold Line Little Tokyo/Arts District and Pico/Aliso Stations. Furthermore, the Project would provide short- and long-term bicycle parking spaces as required by the LAMC in addition to bicycle-serving amenities that would further encourage biking.

Previously, trip generation for land uses was calculated based on survey data collected by the Institute of Transportation Engineers (ITE). However, these ITE trip generation rates were based on data collected at suburban, single-use, free standing sites, which may not be representative of urban mixed-use environments. Beginning in 2019, the USEPA has sponsored a study to collect travel survey data from mixed-use developments in order provide a more representative trip generation rate for multi-use sites. Results of the USEPA survey indicate that trip generation and VMT are affected by factors such as resident and job density, availability of transit, and accessibility of biking and walking paths. Based on these factors, the USEPA has developed equations known as the EPA Mixed-Use Development (MXD) model to calculate trip reductions for multi-use developments.⁴⁸ The LADOT VMT Calculator incorporates the USEPA MXD model and accounts for project features such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites. As shown in Appendix D, incorporation of USEPA MXD VMT reduction features applicable to the Project results in a

⁴⁷ *The City's Zoning Information and Map Access System (ZIMAS) also shows the Project Site in a Transit Priority Area (TPA). However, transit headways do not appear to meet the requirements for a TPA.*

⁴⁸ *Environmental Protection Agency, Mixed-Use Trip Generation Model, www.epa.gov/smartgrowth/mixed-use-trip-generation-model, accessed April 9, 2020.*

23 percent reduction in overall VMT and resultant transportation fuel consumption compared to the baseline ITE trip generation rates.

As such, the Project's siting would minimize transportation fuel consumption through the reduction of VMT, as described above and discussed further in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR.

As summarized in Table IV.C-2, when accounting for the measures that would be implemented to reduce VMT, the Project's estimated petroleum-based fuel usage would be approximately 681,701 gallons of gasoline and 124,347 gallons of diesel per year, or a total of 806,049 gallons of petroleum-based fuels annually, compared to 1,044,049 gallons of petroleum-based fuels annually for a project without reduction features.

(3) Summary of Energy Requirements and Energy Use Efficiencies

CEQA Guidelines Appendix F recommends quantification of a project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of a project's life cycle including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed. The Project's energy requirements were calculated based on the methodology contained in CalEEMod for electricity and natural gas usage. The calculations also took into account energy efficiency measures, such as Title 24, CALGreen Code, and vehicle fuel economy standards. Tables IV.C-1 and IV.C-2 in Section IV.C, Energy, of this Draft EIR, respectively, provide a summary of Project construction and operational energy usage, respectively. During Project construction activities, a total of 64,697 kWh of electricity would be consumed along with 498,894 gallons of transportation fuel (gasoline and diesel). During Project operations, a total of 5,996 MWh of electricity, 9,294,200 cf of natural gas, and 806,049 gallons of transportation fuel would be consumed on an annual basis. When accounting for project design features and increased energy efficiency measures, operational electricity usage would be reduced by 10 percent, and transportation fuel usage would be reduced by 23 percent when compared to the Project without energy efficiency measures. With implementation of Mitigation Measure TR-MM-1 (TDM Program), transportation fuel would be further reduced by approximately 38,175 gallons of gasoline and 6,963 gallons of diesel per year. This mitigation measure would further support that the Project would not result in wasteful, inefficient or unnecessary consumption of energy resources. Details are provided in Appendix D of this Draft EIR.

(ii) *The effects of the project on local and regional energy supplies and on requirements for additional capacity*

(1) Construction

As discussed above, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. The estimated construction electricity usage represents approximately 1 percent of the estimated net annual operational demand which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP.⁴⁹ Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus, there would be no demand generated by construction, resulting in a net decrease when compared to existing operations. Transportation fuel usage during Project construction activities would represent approximately 0.002 percent of gasoline usage and 0.02 percent of diesel usage within Los Angeles County, respectively. As energy consumption during Project construction activities would be relatively negligible, the Project would not likely affect regional energy consumption in years during the construction period.

(2) Operation

Based on LADWP's 2017 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2024–2025 fiscal year (the Project's buildout year) will be 23,286 GWh of electricity.^{50,51} As such, the Project-related net increase in annual electricity consumption of 5,996 MWh per year would represent less than 0.03 percent of LADWP's projected sales in 2024.⁵² Furthermore, LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project

⁴⁹ *The percentage is derived by taking the total amount of electricity usage during construction (64,697 kWh) and dividing that number by the total amount of net electricity usage during operation (5,996 MWh) to arrive at 1 percent.*

⁵⁰ *LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.*

⁵¹ *LADWP, 2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A, Table A-1.*

⁵² *LADWP, 2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A.*

area.⁵³ Therefore, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand.

As stated above, the Project's estimated net decrease in demand for natural gas is 9,294,200 cf per year, which translates to 25,464 cf per day. Based on the 2018 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2.47 billion cf per day in 2024 (the Project's buildout year).⁵⁴ The Project would account for approximately 0.001 percent of the 2024 forecasted consumption in SoCalGas' planning area. Furthermore, SoCalGas has confirmed that the Project's natural gas demand can be served by the facilities in the Project area.⁵⁵

As energy consumption during Project operation would be relatively negligible and energy requirements are within LADWP's and SoCalGas' service provision, Project operation would not likely affect regional energy consumption.

(iii) The effects of the project on peak and base period demands for electricity and other forms of energy

As discussed above, electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. With regard to peak load conditions, the LADWP power system experienced an all time high peak of 6,432 MW on August 31, 2017.⁵⁶ LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2017, the base case peak demand for the power grid is 5,854 MW.⁵⁷ Under peak conditions, the Project would consume a total of 5,996 MWh on an annual basis, which is equivalent to a daily peak load of 1,229 kW. In comparison to the LADWP power grid base peak load of 5,854 MW in 2017, the Project would represent approximately 0.02 percent of the LADWP base peak load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.4 percent would be sufficient to account for future electrical

⁵³ KPFF Consulting Engineers, *Utility Technical Report: Water, Wastewater, and Energy, February 27, 2018, refer to Appendix E of this Draft EIR.*

⁵⁴ *California Gas and Electric Utilities, 2018 California Gas Report p. 100. Interpolated between 2025 and 2030 estimates.*

⁵⁵ KPFF Consulting Engineers, *Utility Technical Report: Water, Wastewater, and Energy, February 27, 2018, refer to Appendix E of this Draft EIR.*

⁵⁶ *LADWP, 2017 Retail Electric Sales and Demand Forecast. p. 6.*

⁵⁷ *LADWP, 2017 Retail Electric Sales and Demand Forecast. p. 6.*

demand by the Project.⁵⁸ As shown in Table IV.K-1, electricity usage during Project construction activities would be lower than the operational activities. As Project operational electricity usage demands would be met by the LADWP supplies, construction electricity usage would not significantly impact the electrical grid. Therefore, Project electricity consumption during construction and operational activities would have a negligible effect on peak load conditions of the power grid.

(iv) The degree to which the project complies with existing energy standards

Construction equipment would comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act or previous Energy Policy Acts for electrical motors and equipment.⁵⁹ Electricity and natural gas usage during Project operations presented in Table IV.C-1 of Section IV.C, Energy, of this Draft EIR, would comply with 2019 Title 24 standards and applicable 2019 CALGreen Code and Los Angeles Green Building Code requirements. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

With regard to transportation fuels, the Project would comply with CARB's anti-idling regulations, as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. During Project operations, vehicles traveling to and from the Project Site are assumed to comply with CAFE fuel economy standards, as required.

Based on the above, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage, as well as transportation fuel consumption.

(v) Effects of the Project on Energy Resources

As discussed above, LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal wind and hydropower. The LADWP's most recently adopted 2017 Power Strategic Long-Term Resources Plan identifies adequate resources (natural gas, coal) to support future generation capacity.

⁵⁸ LADWP, 2017 Retail Electric Sales and Demand Forecast. p. 6.

⁵⁹ Energy Independence and Security Act of 2007. Pub.L. (110-140).

Natural gas supplied to Southern California is mainly sourced from out of state with a small portion originating in California. Sources of natural gas for the Southern California region are obtained from locations throughout the western United States as well as Canada.⁶⁰ According to the U.S. Energy Information Administration (EIA), the United States currently has over 80 years of natural gas reserves based on 2015 consumption.⁶¹ Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Therefore, Project construction and operation activities would have a negligible effect on natural gas supply.

With regard to on-site energy resources, the Project Site does not contain any significant sources of renewable (i.e., water, solar, wind, geothermal) or non-renewable energy, such as coal, natural gas, and petroleum. In addition, the Project would not generate power using non-renewable sources or associated energy transmission lines. Therefore, the Project construction and operation activities would not conflict with existing or planned energy resources.

Transportation fuels (gasoline and diesel) are produced from crude oil, which is imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.⁶² The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). The Project would also include adequate alternative modes of transportation by providing for bicycle parking spaces and preferred parking for fuel efficient vehicles, resulting in a reduction of transportation fuel usage. Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

One of the objectives of SB 350 is to increase procurement of California's electricity from renewable sources from 33 percent to 50 percent by 2030. However, as of September 2018, SB 100 was signed, which would require retail sellers of electric services to increase procurement from eligible renewable energy resources to 50 percent renewable resources target by December 31, 2026, and 60 percent by December 31, 2030. Accordingly, LADWP is required to procure at least 60 percent of their energy portfolio from renewable sources by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources account for

⁶⁰ *California Gas and Electric Utilities, 2018 California Gas Report.*

⁶¹ *U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed April 9, 2020.*

⁶² *BP Global, Oil Reserves, www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil/oil-reserves.html, accessed April 9, 2020.*

32 percent of LADWP's overall energy mix in 2018, the most recent year for which data are available.⁶³ This represents the available off-site renewable sources of energy that would meet the Project's energy demand. The Project's use of renewable energy would indirectly reduce use of fuels required for electricity generation (e.g., natural gas, coal, oil). While the Project's electricity usage rate would not be directly affected by the availability of renewable energy, the Project's usage of renewable energy would indirectly avoid consumption of fossil fuels.

With regard to on-site renewable energy sources, the Project would comply with Title 24 requirements for "Solar Ready Buildings" which requires a certain area of rooftop to be set aside for installation of solar panels. However, due to the Project Site's location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, methane, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.⁶⁴

(vi) The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives

As discussed above, the Project would include project features to reduce VMT during operational activities. The Project includes dedicated bicycle parking facilities and encourages non-automotive forms of transportation, such as walking or biking to destinations. In addition, the Project represents an infill development within an existing urbanized area that would concentrate new residential, office, retail/restaurant, and community room that residents could use for art production within an HQT. Specifically, three Metro Local bus routes run within 0.25 mile of the Project Site, including Metro Local Routes 18, 60, and 62, with stops along Santa Fe Avenue and 7th Street. Metro Local Route 60 stops adjacent to the Project Site along Santa Fe Avenue. Metro Rapid 720 bus route also runs within 0.5 mile of the Project Site, with a stop at the corner of 7th Street and Decatur Street. The Project Site is also located approximately 1.5 miles away from the Metro Gold Line Little Tokyo/Arts District and Pico/Aliso Stations. As further discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, these measures would reduce Project-related VMT in comparison to a standard project without convenient access to

⁶³ CEC, 2018 Power Content Label, Los Angeles Department of Water and Power, July 2019.

⁶⁴ CEC, Wind Resource Area & Wind Resources, www.energy.ca.gov/maps/renewable/wind.html, updated August 3, 2018.

mass transit, with a corresponding reduction in the Project's petroleum-based fuel usage. Therefore, the Project would encourage the use of efficient transportation alternatives.

(vii) The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements

The current City of Los Angeles Green Building Code requires compliance with CALGreen Code and Title 24. In addition, the Project would implement measures to further reduce energy consumption during operations such as use of energy efficient appliances and water saving measures. Therefore, the Project would incorporate measures that are consistent with or better than current state and City energy conservation requirements.

The City has also adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), and the Exclusive Franchise System Ordinance (Ordinance No. 182,986). These solid waste reduction programs and ordinances help to reduce the number of trips associated with hauling solid waste, thereby reducing the amount of petroleum-based fuel consumed. Furthermore, recycling efforts indirectly reduce the energy necessary to create new products made of raw material, which is an energy-intensive process. As discussed in the Initial Study included as Appendix A of this Draft EIR, the Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with Ordinance No. 171,687, which requires that development projects include an on-site recycling area or room of specified size.⁶⁵ The Project would also comply with State and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Thus, through compliance with the City's construction-related solid waste recycling programs, the Project would contribute to reduced fuel-related energy consumption.

With implementation of these features along with complying with state and local energy efficiency standards, the Project would meet and/or exceed all applicable energy conservation policies and regulations.

(viii) Whether the Project conflicts with adopted energy conservation plans

As discussed in Section IV.E, Greenhouse Gas Emissions, the City has published the LA Green Plan/ClimateLA in 2007, which outline goals and actions by the City to

⁶⁵ Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

reduce GHG emissions. To facilitate implementation of the LA Green Plan/Climate LA, the City adopted the Green Building Code. The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and Title 24, which have been incorporated into the City's Green Building Code.

With regard to transportation uses, the Project design would reduce VMT throughout the region and encourage use of alternative modes of transportation. The Project would be consistent with regional planning strategies that address energy conservation. As discussed above and in Section IV.F, Land Use, of this Draft EIR, SCAG's 2016–2040 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the 2016–2040 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Project would be consistent with the energy efficiency policies emphasized in the 2016–2040 RTP/SCS. Most notably, the Project would be an infill development within an existing urbanized area that would concentrate new residential, office, retail/restaurant, and artist production amenity uses within an HQTAs⁶⁶, which is defined by the 2016–2040 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours (see Section IV.F, Land Use, of this Draft EIR for further details). Specifically, three Metro Local bus routes run within 0.25 mile of the Project site including Metro Local Routes 18, 60, and 62, with stops along Santa Fe Avenue and 7th Street. Metro Local Route 60 stops adjacent to the Project Site along Santa Fe Avenue. Metro Rapid 720 bus route also runs within 0.5 mile of the Project Site, with a stop at the corner of 7th Street and Decatur Street. The Project Site is also located approximately 1.5 miles away from the Metro Gold Line Little Tokyo/Arts District and Pico/Aliso Stations. Furthermore, the Project would provide short- and long-term bicycle parking spaces as required by the LAMC. Development of the Project within an HQTAs would encourage the use of transit and reduce the transportation fuel associated with VMT.

The introduction of new housing and job opportunities within an HQTAs, as proposed by the Project, is consistent with numerous policies in the 2016–2040 RTP/SCS. The 2016–2040 RTP/SCS is estimated to result in an 8-percent decrease in VMT by 2020, an 18-percent decrease in VMT by 2035, and a 21-percent decrease in VMT by 2040. In March 2018, CARB adopted updated targets requiring a 19-percent decrease in VMT for the SCAG region by 2035. As the CARB targets were adopted after the 2016–2040 RTP/SCS, it is expected that the updated targets will be incorporated into the next

⁶⁶ SCAG, 2016–2040 RTP/SCS, Exhibit 5.1, dated April 2016.

RTP/SCS. The 2016–2040 RTP/SCS and/or the next RTP/SCS are expected to fulfill and exceed SB 375 compliance with respect to meeting the State’s GHG emission reduction goals. Consistent with both the 2016–2040 RTP/SCS and CARB’s updated targets adopted in March 2018, the Project would reduce VMT by 23 percent, thereby reducing fuel usage.

These VMT reducing measures are also consistent with the goals of the Sustainable City pLAn/L.A.’s Green New Deal, which targets GHG emissions generated by city-owned buildings and properties. Although the Sustainable City pLAn/L.A.’s Green New Deal targets City-generated GHG emissions, the Project would also comply with or not conflict with measures to reduce GHG emission. In addition, as previously discussed, the Project would exceed state energy efficiency requirements and would use electricity from LADWP, which had a renewable energy mix of 32 percent in 2018, the most recent year for which data are available. All of these features would serve to reduce the consumption of electricity, natural gas, and transportation fuel. Based on the above, the Project would be consistent with adopted energy conservation plans.

(ix) Conclusion Regarding Significance Threshold No. 1

As demonstrated in the analysis above, the Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation. Project Design Feature GHG-PDF-1, would allow the Project to exceed Title 24, Part 6, California Energy Code baseline standard requirements for energy efficiency. The Project would also reduce VMT by 23 percent in comparison to a Project without trip reduction features (transit accessibility, mix of uses, proximity to job centers), thereby reducing fuel usage. The Project’s energy requirements would not significantly affect local or regional supplies or capacity. The Project’s energy usage during base and peak periods would be consistent with electricity and natural gas future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would be sufficient to meet the needs of Project-related construction and operational activities. During construction the Project would comply with on-road fuel economy Title 24 energy efficiency standards where applicable resulting in efficient use of energy. During operations, the Project would comply with applicable energy efficiency requirements, such as CALGreen Code, as well as include energy conservation measures beyond such requirements. **In summary, the Project would comply with relevant energy efficiency standards and would not cause wasteful, inefficient, or unnecessary use of energy. Therefore, Project impacts related to energy use would be less than significant during construction and operation.**

(b) Conflicts with Plans for Renewable Energy or Energy Efficiency

Energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2019 CALGreen building code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City of Los Angeles Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency. In addition, the Project would implement measures to exceed Title 24 energy efficiency requirements.

With regard to transportation related energy usage, the Project would comply with goals of the SCAG's 2016–2040 RTP/SCS, which incorporates VMT targets established by SB 375. The Project's mixed-use development and proximity to major job centers and public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during Project operations would comply with CAFE fuel economy standards. During construction activities, the Project would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations.

Based on the above, the Project would not conflict with adopted energy conservation plans, or violate state or federal energy standards. **Therefore, Project impacts associated with regulatory consistency would be less than significant.**

(4) Greenhouse Gas Emissions

(a) Consistency with Applicable Plans and Policies

Compliance with applicable GHG emissions reduction plans would result in a less-than-significant Project-level and cumulative impact. The following section describes the extent the Project complies with or exceeds the performance-based standards included in the regulations outlined in the *Climate Change Scoping Plan* and subsequent updates, the 2016–2040 RTP/SCS, and the Sustainable City pLAn/L.A.'s Green New Deal. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

(i) Climate Change Scoping Plan

The *Climate Change Scoping Plan* sets forth a range of GHG reduction actions which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the program. The following discussion demonstrates how the pertinent reduction actions relate to and reduce project-related GHG emissions.

Project GHG emissions are quantified further below in the document. As shown in Table IV.E-10 in Section IV.E, Greenhouse Gas Emissions of this Draft EIR, the Project would result in 8,040 MTCO₂e annually. The breakdown of the Project's GHG emissions by source category shows approximately 1 percent from area sources; 25 percent from energy consumption; 66 percent from mobile sources; less than 1 percent from stationary sources; 1 percent from solid waste generation; 4 percent from water supply, treatment, and distribution; and 3 percent from construction activities. Provided in Table IV.E-5 in Section IV.E, Greenhouse Gas Emissions of this Draft EIR is an evaluation of applicable reduction actions/strategies by emissions source category outlined in the *Climate Change Scoping Plan* that through implementation would serve to indirectly reduce Project GHG emissions. Further evaluation of project design features and specific applicable policies and measures in the Climate Change Scoping Plan is provided in Table IV.E-6 in Section IV.E, Greenhouse Gas Emissions of this Draft EIR. As shown therein, the Project would not conflict with the policies included in the *Climate Change Scoping Plan*. Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets.

(ii) 2016–2040 RTP/SCS

The purpose of SB 375 is to implement the state's GHG emissions reduction goals by integrating land use planning with the goal of reducing car and light-duty truck travel. Under SB 375, the primary goal of the SCS is to provide a framework for future growth that will decrease per capita GHG emissions from cars and light-duty trucks based on land use planning and transportation options. To accomplish this goal, the SCS identifies various strategies to reduce per capita VMT.

The 2016–2040 RTP/SCS is expected to help SCAG reach its GHG reduction goals, as identified by CARB, with reductions in per capita transportation for specified target years. In March 2018, CARB updated the SB 375 targets to require 8-percent reduction by 2020 and a 19-percent reduction by 2035 in per capita passenger vehicle GHG emissions.⁶⁷ As this reduction target was updated after the 2016–2040 RTP/SCS, it is expected that the next iteration of the RTP/SCS will be updated to include this target.

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2016–2040 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and

⁶⁷ CARB, *SB 375 Regional Greenhouse Gas Emissions Reduction Targets*.

transportation demands. Thus, successful implementation of the 2016–2040 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. With regard to individual developments, such as the Project, strategies and policies set forth in the 2016–2040 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved energy efficiency. These strategies and policies are addressed below.

(1) Consistency with Integrated Growth Forecast

The 2016–2040 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG’s Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. According to the 2016–2040 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2018 is approximately 4,009,193 persons.⁶⁸ In 2024, the projected year of full Project occupancy, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,172,886 persons.⁶⁹ Based on a household size factor of 2.42 persons per household, the Project is estimated to generate a new residential population of 840 persons at full buildout.⁷⁰ The estimated new residents generated by the Project would represent approximately 0.51 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2018 and 2024.⁷¹ Based on employee generation factors provided by the Los Angeles Unified School District, development of the Project would result in approximately 961 new employment positions on the Project Site.⁷² According to the 2016–2040 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2018 is approximately 1,797,693 employees.⁷³ In 2024, the projected occupancy year of the Project, the City of Los Angeles Subregion is

⁶⁸ Based on a linear interpolation of 2012–2040 data.

⁶⁹ Based on a linear interpolation of 2012–2040 data.

⁷⁰ Based on a rate of 2.42 persons per multi-family unit based on the 2017 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.

⁷¹ $840 \div 163,693 = 0.51$ percent

⁷² LAUSD, *Developer Fee Justification Study*, March 2018, Table 14. Based on 0.00479 employee per square foot for Standard Commercial Office and 0.00271 employee per square foot for Neighborhood Shopping Centers, the Project’s 187,374 square feet of office uses, 21,858 square feet of retail restaurant uses, and 926-square-foot community room residents could use for art creation would result in 961 employees ($(187,374 * 0.00479) + (21,858 * 0.00271) + (926 * 0.00479) = 961$). The LAUSD Developer Fee Justification Study does not include an employee generation rate for artist production space. To provide a conservative estimate, the highest generation rate (i.e., Standard Commercial Office) was used.

⁷³ Based on a linear interpolation of 2012–2040 data.

anticipated to have approximately 1,898,986 employees.⁷⁴ Thus, the Project's estimated 961 new employees would constitute approximately 0.95 percent of the employment growth forecasted between 2018 and 2024.⁷⁵

Similar projections form the basis of the 2016 AQMP, which provides emissions inventories, ambient measurements, meteorological episodes, and air quality modeling tools. The AQMP also provides policies and measures to guide responsible agencies in meeting National Ambient Air Quality Standards as expeditiously as practicable, but no later than the statutory attainment deadlines. Because the 2016 AQMP and growth forecasts discussed above are both based on the 2016–2040 RTP/SCS, it can be concluded that the Project would be consistent with the projections in the AQMP and would not conflict with its regional air quality goals. Please refer to Section IV.F, Land Use, of this Draft EIR, for additional information regarding consistency with the 2016–2040 RTP/SCS.

(2) Consistency with VMT Reduction Strategies and Policies

The 2016–2040 RTP/SCS includes, for the SCAG region as a whole, a daily 22.8 Total VMT per capita for the 2012 Base Year, and a daily 20.5 Total VMT per capita for the 2040 Plan Year.⁷⁶ For Los Angeles County, the 2012 Base Year daily Total VMT per capita is 21.5 and the daily Total VMT per capita is 18.4 for the 2040 Plan Year.⁷⁷ To analyze the consistency of the Project with the 2016–2040 RTP/SCS, the Project's VMT was calculated separately for households and workers to arrive at the per capita Total Daily VMT estimates. The estimate of 7.7 VMT per capita for Project residents and 7.5 VMT per capita for Project employees, as provided in Table IV.E-7 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, was compared to SCAG's VMT data for the region and Los Angeles County provided by the 2016–2040 RTP/SCS, which in both instances the Project's per capita Total VMT estimate was lower. As shown in Appendix B of the Draft EIR, the Project design includes characteristics that would reduce trips and VMT as compared to the Project without implementation of VMT reducing measures within the Air Basin as measured by CalEEMod. These relative reductions in vehicle trips and VMT from the Project without implementation of VMT reducing measures within the Air Basin help quantify the GHG emissions reductions achieved by locating the Project in an infill, HQTAs area that promotes alternative modes of transportation. Specifically, the Project would increase density on the Project Site from five dwelling units per acre to 157 dwelling units per acre and from 48 jobs per acre to approximately 434 jobs per acre; introduce a mix of

⁷⁴ Based on a linear interpolation of 2012–2040 data.

⁷⁵ $961 \div 101,293 = 0.95$ percent

⁷⁶ SCAG, 2016–2040 RTP/SCS, April 2016, p. 155.

⁷⁷ SCAG, 2016–2040 RTP/SCS, April 2016, p. 155.

residential, retail, and office uses on the Project Site in proximity to other existing off-site residential, office, retail, restaurant, and industrial uses which would reduce VMT by encouraging walking and non-automotive forms of transportation; introduce new housing and jobs in close proximity to densely populated areas including Downtown Los Angeles; and increase transit accessibility by locating new housing and jobs within 0.25 mile of existing bus routes and approximately 1.5 miles of the Metro Gold Line Little Tokyo/Arts District station.

The LADOT VMT Calculator incorporates the USEPA MXD model and accounts for project features discussed above (e.g., increased density and proximity to transit), which would reduce VMT and associated fuel usage in comparison to free-standing sites. As shown in Appendix B, incorporation of USEPA MXD VMT reduction features applicable to the Project results in a 23-percent reduction in overall VMT and resultant pollutant emissions compared to baseline ITE trip generation rates. Furthermore, with implementation of Mitigation Measure TR-MM-1, implementation of a TDM program, the Project would result in a 28-percent reduction in overall VMT and associated emissions.

As shown in Table IV.E-7, the Total Project VMT per capita of 7.6 per day would be below the overall SCAG region's daily 20.5 Total VMT per capita for the 2040 Plan Year and Los Angeles County's 18.4 daily Total VMT per capita for the 2040 Plan Year. As discussed above, the Project daily per capita VMT is 7.7 miles for residents, which represents a reduction of 67 percent in daily per capita VMT when compared to the SCAG regional baseline of 22.8 daily per capita VMT. Project employee daily per capita VMT is 7.5 miles, which is a 67-percent reduction in comparison to SCAG baseline. This reduction in VMT is substantially better than the goals of the 2016–2040 RTP/SCS with an estimated 18-percent decrease in per capita GHG emissions from passenger vehicles by 2035 and 21-percent decrease in per capita GHG emissions from passenger vehicles by 2040.⁷⁸ This reduction is attributable to the Project characteristics of being an infill project near transit that supports multi-modal transportation options. It should be noted that the VMT per capita calculation is for informational purposes to demonstrate consistency with the 2016–2040 RTP/SCS.

The Project would also be consistent with the following key GHG reduction strategies in SCAG's 2016–2040 RTP/SCS, which are based on changing the region's land use and travel patterns:

⁷⁸ CARB updated the SB 375 targets for the SCAG region, requiring a 19-percent decrease in VMT by 2035. Implementation of the 2016 RTP/SCS or the next plan is expected to fulfill and exceed the region's obligations under SB 375 with respect to meeting the State's VMT and related GHG emission reduction goals.

- Compact growth in areas accessible to transit;
- More multi-family housing;
- Jobs and housing closer to transit;
- New housing and job growth focused in HQTAs; and
- Biking and walking infrastructure to improve active transportation options and transit access.

The Project represents an infill development within an existing urbanized area that would concentrate new residential, office, and restaurant/retail uses within an HQTA, which is defined by the 2016–2040 RTP/SCS as a generally walkable transit village or corridor that is within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours (see Section IV.F, Land Use, of this Draft EIR for further discussion). Specifically, three Metro Local bus routes run within 0.25 mile of the Project Site. The Project Site is also located 1.5 miles from the Metro Little Tokyo/Arts District station. Furthermore, the Project would provide short- and long-term bicycle parking spaces as required by the LAMC. These and other measures would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG’s 2016–2040 RTP/SCS.

(3) Increased Use of Alternative Fueled Vehicles Policy Initiative

The second goal of the 2016–2040 RTP/SCS, with regard to individual development projects, such as the Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions. The 2016–2040 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies. The Project would provide at least 30 percent of the total Code-required parking spaces provided to be capable of supporting future EVSE and provide at least 10 percent of the total Code-required parking spaces provided with EV charging stations as dictated by City codes.

(4) Energy Efficiency Strategies and Policies

The third important goal within the 2016–2040 RTP/SCS for individual developments, such as the Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions. The 2016–2040 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where possible. As discussed above, the Project will incorporate energy efficient lighting and electricity consumption in compliance with 2019 Title 24 Standards which ensure that builders use the most energy efficient and energy conserving technologies and construction practices.

In total, Project GHG emissions from electricity and natural gas usage would be reduced by 6 percent with implementation of project design features.

(5) Land Use Assumptions

At the regional level, the 2016–2040 RTP/SCS is a plan adopted for the purpose of reducing GHGs. In order to assess the Project’s potential to conflict with the 2016–2040 RTP/SCS, this Draft EIR also analyzes the Project’s land use assumptions for consistency with those utilized by SCAG in its RTP/SCS. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as the 2016–2040 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The Project’s consistency with the applicable goals and principles set forth in the 2016–2040 RTP/SCS is analyzed in Table IV.E-5 on page IV.E-63 of Section IV.F, Land Use, of the Draft EIR. As shown in Table IV.E-5 the Project is consistent with the goals and principles set forth in the 2016–2040 RTP/SCS.⁷⁹

In sum, the Project is the type of land use development that is encouraged by the 2016–2040 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the state’s long-term climate policies.⁸⁰ By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with state regulatory requirements.

Therefore, the Project would be consistent with the GHG reduction-related actions and strategies contained in the 2016–2040 RTP/SCS. Overall, the Project would be consistent with the 2016–2040 RTP/SCS, which is intended to reduce GHG emissions.

(iii) City of Los Angeles Sustainable City pLAN/L.A.’s Green New Deal

The Sustainable City pLAN/L.A.’s Green New Deal, a mayoral initiative, includes both short-term and long-term aspirations through the year 2050 in various topic areas, including: water, renewable energy, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. While not a plan adopted solely to reduce GHG emissions, within

⁷⁹ As discussed in the 2016–2040 RTP/SCS, the actions and strategies included in the 2016–2040 RTP/SCS remain unchanged from those adopted in the 2012–2035 RTP/SCS.

⁸⁰ As discussed above, SB 375 legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32.

L.A.'s Green New Deal (Sustainable City pLAN 2019), climate mitigation is one of eight explicit benefits that help define its strategies and goals.

The Sustainable City pLAN/L.A.'s Green New Deal provides information as to what the City will do with buildings and infrastructure in their control, and provides specific targets related to housing and development as well as mobility and transit, including the reduction of vehicle miles traveled per capita by 5 percent by 2025, and increasing trips made by walking, biking or transit by at least 35 percent by 2025. As noted above, the Sustainable City pLAN was updated in April 2019 and renamed as L.A.'s Green New Deal which has established targets such as 100 percent renewable energy by 2045, diversion of 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035. Although the Sustainable City pLAN/L.A.'s Green New Deal mainly targets GHG emissions related to City owned buildings and operations, certain reductions would also benefit the Project. Such measures include increasing renewable energy usage; reduction of per capita water usage; promotion of walking and biking to work, promotion of high density housing close to major transportation stops; and various recycling and trash diversion goals. Table IV.E-8 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, provides a discussion of the Project's consistency with applicable GHG-reducing actions from L.A.'s Green New Deal. As discussed therein, the Project would be consistent with the applicable goals and actions of L.A.'s Green New Deal.

The Project would generally comply with these targets as the Project is an infill development infill development within an existing urbanized area that is within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Specifically, three Metro Local bus routes run within 0.25 mile of the Project Site. The Project Site is also located 1.5 miles from the Metro Gold Line Little Tokyo/Arts District station. Furthermore, the Project would comply with CALGreen, implement various project design features to reduce energy usage, including Project Design Feature GHG-PDF-1 and Project Design Feature WAT-PDF-1, and would comply with the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the targets included in the Sustainable City pLAN/L.A.'s Green New Deal with regard to energy-efficient buildings and waste and landfills. The Project would also provide secure short- and long-term bicycle storage areas for Project employees and guests. **Therefore, the Project would be consistent with the Sustainable City pLAN/L.A.'s Green New Deal.**

(iv) Post-2030 Analysis

Recent studies show that the State's existing and proposed regulatory framework will put the State on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050 if additional appropriate

reduction measures are adopted.⁸¹ Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the Statewide emissions level to remain very low through 2050.

Subsequent to the findings of these studies, SB 32 was passed on September 8, 2016, which would require the State board to ensure that Statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. As discussed above, the new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries. The Project's design features advance these goals by reducing VMT, increasing the use of electric vehicles, improving energy efficiency and reducing water usage.

Further, the Project's consistency with SCAG's RTP/SCS demonstrates that the Project will be consistent with post-2020 GHG reduction goals. The 2016–2040 RTP/SCS would result in an estimated 8-percent decrease in per capita GHG emissions by 2020, 18-percent decrease in per capita GHG emissions from passenger vehicles by 2035, and 21-percent decrease in per capita GHG emissions from passenger vehicles by 2040. In March 2018, CARB adopted updated targets requiring a 19-percent decrease in VMT for the SCAG region by 2035. As the CARB targets were adopted after the 2016–2040 RTP/SCS, it is expected that the updated targets will be incorporated into the next RTP/SCS. The 2016–2040 RTP/SCS and/or the next RTP/SCS are expected to fulfill and exceed SB 375 compliance with respect to meeting the State's GHG emission reduction goals.

The Project is the type of land use development that is encouraged by the RTP/SCS to reduce VMT and expand multi-modal transportation options. As shown in Table IV.E-7 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the 7.7 Total Project VMT per capita for residential uses is below the overall SCAG region's daily average of

⁸¹ *Energy and Environmental Economics (E3). "Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios" (April 2015); Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158–172). The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved, as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation and electricity sectors.*

20.5 Total VMT per capita for the 2040 Plan Year and Los Angeles County's daily average of 18.4 VMT per capita for the 2040 Plan Year.

As discussed above, the Project daily per capita VMT for residents represents a reduction of 67 percent in daily per capita VMT when compared to the SCAG regional baseline of 22.8 daily per capita VMT. Project employee daily per capita using LADOT's VMT calculator is VMT is 7.5 miles which is a 67-percent reduction in comparison to SCAG baseline which is consistent with the reduction in transportation emission per capita provided in the 2016–2040 RTP/SCS. By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with State climate targets beyond 2020.

The emissions modeling in the 2017 Update has projected 2030 statewide emissions which take into account known commitments (reduction measures) such as SB 375, SB 350, and other measures shown in Table IV.E-6 in Section IV.E-6, Greenhouse Gas Emissions, of this Draft EIR. The emissions inventory identified an emissions gap, meaning that emissions reductions due to known commitments do not decline fast enough to achieve the 2030 target. In order to fill this gap, the 2017 Update assumed a scenario in which the Cap-and-Trade Program would deliver the reductions necessary to achieve the 2030 emissions target. Although the Project is consistent with the 2017 Update, additional measures to achieve the 2030 targets and beyond are outside of the City or the Project's control. Therefore, any evaluation of post-2030 Project GHG emissions would be speculative.

(v) Conclusion

Because the Project's location, land use characteristics, and design render it consistent with statewide and regional climate change mandates, plans, policies, and recommendations, and with the City's Green Building Code and the Sustainability pLAN/L.A.'s Green New Deal, the Project would not conflict with any applicable plan, policy, regulation or recommendation to reduce GHG emissions and its impacts would be less than significant.

(b) Project Emissions

CEQA Guidelines Section 15064.4 recommends quantification of a Project's GHG emissions. However, the quantification is being done for informational purposes only and Project GHG emissions are not evaluated against any numeric threshold. The Project would result in direct and indirect GHG emissions generated by different types of emissions sources, including:

- Construction: emissions associated with demolition of the existing buildings and surface parking areas, shoring, excavation, grading, and construction-related equipment and vehicular activity;
- Area source: emissions associated with landscaping equipment and consumer products;
- Energy source (building operations): emissions associated with space heating and cooling, water heating, energy consumption, and lighting;
- Mobile source: emissions associated with vehicles accessing the Project Site;
- Stationary source: emissions associated with stationary equipment (e.g., emergency generators);
- Solid Waste: emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon; and
- Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.

The Project would generate an incremental contribution to and cumulative increase in GHG emissions. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

(i) Construction

As described in Section II, Project Description, of this Draft EIR, the timing of construction of specific elements of the Project would depend on the business needs at the time. Project construction could occur in sequential phases (e.g. demolition, then grading, then building construction), with buildout expected to be completed in 2024. Construction activities would include demolition of some existing uses, grading and excavation, mat foundation pouring, construction of new structures and related infrastructure. Approximately 239,500 cubic yards of export material (e.g., concrete and asphalt surfaces) and soil would be hauled from the Project Site during excavation. The emission of GHGs associated with construction of the Project were calculated for each year of construction activity. A summary of GHG emissions for each year of construction is presented in Table IV.E-9 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR.

As presented in Table IV.E-9, construction of the Project is estimated to generate a total of 6,806 MTCO_{2e}. As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions

estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.⁸² This results in annual Project construction emissions of 227 MTCO_{2e}. A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in Appendix B of this Draft EIR.

(ii) Operation

(1) Area Source Emissions

Area source emissions were calculated using the CalEEMod emissions inventory model, which includes landscape maintenance equipment, consumer products, and fireplaces. As shown in Table IV.E-10, Greenhouse Gas Emissions, of this Draft EIR, the Project, at full buildout, is expected to result in 81 MTCO_{2e} per year from area sources. Please refer to Appendix B of this Draft EIR for the supporting calculations that reflect the emission reduction measures.

(2) Electricity and Natural Gas Generation Emissions

GHGs are emitted as a result of activities in buildings when electricity and natural gas are used as energy sources. Combustion of any type of fuel emits CO₂ and other GHGs directly into the atmosphere; when this occurs in a building or property, it is a direct emission source associated with that building or property. GHGs are also emitted during the generation of electricity from fossil fuels. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant; accordingly, electricity use in a building generally causes emissions in an indirect manner.

Electricity and natural gas emissions were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the energy usage by applicable emissions factors chosen by the utility company. GHG emissions from electricity use are directly dependent on the electricity utility provider. In this case, GHG intensity factors for LADWP were selected in CalEEMod. The carbon intensity (lbs/MWh) for electricity generation was calculated for the Project buildout year based on LADWP projections for year 2024. LADWP's carbon intensity projections also take into account SB 350 RPS requirements for renewable energy.

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building,

⁸² SCAQMD Governing Board Agenda Item 31, December 5, 2008.

such as plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., heating, ventilation, and air conditioning [HVAC] system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting.

CalEEMod electricity and natural gas usage rates are based on the CEC-sponsored California Commercial End-Use Survey (CEUS) and California Residential Appliance Saturation Survey (RASS) studies.⁸³ The data are specific for climate zones. Zone 12 was selected for the Project Site based on the zip code tool. Since these studies are based on older buildings, adjustments have been made to CalEEMod default energy use assumptions to account for changes to Title 24 building codes.

The Project would implement a number of project design features that would reduce Project energy consumption. Specifically, Project Design Feature GHG-PDF-1, which would require the Project to incorporate features to reduce overall energy usage beyond Title 24 requirements.

As shown in Table IV.E-10, Greenhouse Gas Emissions, of this Draft EIR, Project GHG emissions from electricity and natural gas usage would result in a total of 1,971 MTCO_{2e} per year and accounts for a 6-percent reduction in energy source emissions with implementation of Project Design Feature GHG-PDF-1 as compared to the Project without implementation of this project design feature. Please refer to Appendix B of this Draft EIR for the supporting calculations that reflect the emission reduction measures.

(3) Mobile Source Emissions

Mobile-source emissions were calculated using the SCAQMD-recommended CalEEMod emissions inventory model. CalEEMod calculates the emissions associated with on-road mobile sources associated with residents, employees, visitors, and delivery vehicles visiting the Project Site based on the number of daily trips generated and VMT.

Mobile source operational GHG emissions were calculated using CalEEMod based on the Project trip-generation estimates provided in the Transportation Study prepared for the Project and included as Appendix N.1 of this Draft EIR.⁸⁴ As discussed in Section IV.H, Transportation, of this Draft EIR, the LADOT VMT Calculator was used to calculate Project VMT and trip estimates based on the number of residential units and amount of building

⁸³ CEC, *Commercial End-Use Survey, March 2006, and California Residential Appliance Saturation Survey, October 2010.*

⁸⁴ *Fehr and Peers, 2143 Violet Street Project Transportation Impact Analysis, City of Los Angeles, February 2020.*

area for the commercial retail, restaurant, and office uses. Pass-by trips were determined using applicable trip-generation rates based on the Institute of Transportation Engineers' (ITE) *Trip Generation, 10th Edition*.

As discussed above, the Project design also includes characteristics that would reduce trips and VMT as compared to a project without VMT reducing measures within the Air Basin as measured by the air quality model (i.e., CalEEMod).

The Project represents an infill development within an existing urbanized area that would concentrate new residential, office, and restaurant/retail uses within an HQTAs, which is defined by the 2016–2040 RTP/SCS as a generally walkable transit village or corridor that is within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours (see Section IV.F, Land Use, of this Draft EIR for further discussion). Specifically, three Metro Local bus routes run within 0.25 mile of the Project site. The Project Site is also located 1.5 miles from the Metro Gold Line Little Tokyo/Arts District station.

As shown in Table IV.E-10 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, Project GHG emissions from mobile sources would result in a total of 5,350 MTCO_{2e} per year, which accounts for a 23-percent reduction in mobile source emissions with implementation of VMT reducing measures as compared to the Project without implementation of VMT reducing measures. Project-related mobile source emissions also take into account City code required EV charging spaces, which would provide for 10 percent of Code-required parking being equipped with EV charging stations. Please refer to Appendix B of this Draft EIR for the supporting calculations that reflect the emission reduction measures.

(4) Stationary Source Emissions

Emissions related to stationary sources were calculated using the CalEEMod emissions inventory model. It is anticipated that the Project would include an emergency generator on-site that would be tested and used infrequently. As shown in Table IV.E-10, the Project scenario is expected to result in two MTCO_{2e} per year from stationary sources.

(5) Solid Waste Generation Emissions

Emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the waste generated by applicable emissions factors provided in Section 2.4 of USEPA's AP-42, *Compilation of Air Pollutant Emission Factors*. CalEEMod solid waste generation rates for each applicable land use were selected for this analysis. As shown in Table IV.E-10, Project GHG emissions from solid waste generation would result in a total of 72 MTCO_{2e} per year which accounts for a

76-percent reduction in solid waste generation emissions due to the City's recycling/diversion rate of 76 percent.

(6) Water Usage and Wastewater Generation Emissions

GHG emissions are related to the energy used to convey, treat, and distribute water and wastewater. Thus, these emissions are generally indirect emissions from the production of electricity to power these systems. Three processes are necessary to supply potable water; these include: (1) supply and conveyance of the water from the source; (2) treatment of the water to potable standards; and (3) distribution of the water to individual users. After use, energy is used as the wastewater is treated and reused by the City as reclaimed water.

Emissions related to water usage and wastewater generation were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the water usage by the applicable energy intensity factor⁸⁵ to determine the embodied energy necessary to supply potable water. GHG emissions are then calculated based on the amount of electricity consumed multiplied by the GHG intensity factors for the utility provider. In this case, embodied energy for Southern California supplied water and GHG intensity factors for LADWP were selected in CalEEMod. Water usage rates were calculated consistent with the requirements under City of Los Angeles Ordinance No. 184,248, 2016 California Plumbing Code, 2019 CALGreen code, 2017 Los Angeles Plumbing Code, and 2020 Los Angeles Green Building Code and reflects approximately a 20-percent reduction as compared to the base demand.

As shown in Table IV.E-10, Project GHG emissions from water/wastewater usage would result in a total of 338 MTCO₂e per year, which takes into account a 20-percent reduction in water/wastewater emissions as required by the 2020 Los Angeles Green Building Code and with implementation of Project Design Feature WAT-PDF-1 included in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR.

(iii) Combined Construction and Operational Impacts

As shown in Table IV.E-10 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, when taking into consideration implementation of project design features provided throughout this Draft EIR, including the requirements set forth in the City of Los Angeles Green Building Code and the full implementation of current state mandates, the GHG emissions for the Project in 2024 would equal 227 MTCO₂e per year (amortized over

⁸⁵ *The intensity factor reflects the average pounds of CO₂e per megawatt generated by a utility company.*

30 years) during construction and 7,813 MTCO₂e per year during operation of the Project with a combined total of 8,040 MTCO₂e per year. It should be noted that Project-related GHG emissions presented above are provided for informational purposes as numeric thresholds have not yet been formally adopted for CEQA evaluations.

(c) Conclusion

In summary, the plan consistency analysis provided above demonstrates that the Project complies with or exceeds the plans, policies, regulations and GHG reduction actions/strategies outlined in the *Climate Change Scoping Plan* and subsequent updates, the 2016–2040 RTP/SCS, and the Sustainable City pLAN/L.A.'s Green New Deal. As the Project would not conflict with relevant plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs, impacts related to regulatory consistency would be less than significant. **Therefore, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs. Furthermore, because the Project is consistent and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, Project-specific impacts with regard to climate change would be less than significant.**

(5) Land Use

(a) Physically Divide a Community

The Project Site is located at the southern edge of the Arts District, a highly urbanized area that has experienced substantial residential and commercial growth over the past decade. This area is currently characterized by a mixture of low- and mid-rise industrial and warehouse buildings that have been restored and converted to commercial uses and live/work units. The Project does not propose a freeway or other large infrastructure that would divide a community. All proposed development would occur within the boundaries of the Project Site, a private plot of land which does not intersect the public right of way, as it currently exists. Therefore, the Project would not physically divide an established community.

As discussed above, the Project would retain four existing buildings and replace the remaining buildings with a new infill mixed-use project containing new live/work units, community room residents could use for art production, and office and retail/restaurant uses.

The Project would not have a long-term effect of adversely altering a neighborhood or community through on-going disruption, division, or isolation of the uses. **As such, the**

Project would not physically divide, disrupt, or isolate an established community, and Project impacts would be less than significant.

(b) Conflict with any land use plan, policy, or regulation

(i) Local Plans and Applicable Policies

Various local plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the goals, objectives, and policies of the General Plan, including the Framework Element, Mobility Plan 2035, Housing Element, and Conservation Element; the Community Plan; the LAMC; the Redevelopment Plan; the River Improvement Overlay District; Citywide Design Guidelines; and the Walkability Checklist that were specifically adopted for the purpose of avoiding or mitigating an environmental effect. It also includes, for informational purposes, a discussion of the Project's consistency with certain goals, objectives, and policies of the General Plan Framework Element and Community Plan pertaining to industrial preservation and conversion.

(1) Los Angeles General Plan

(a) City of Los Angeles General Plan Framework Element

The Project's general consistency with the applicable goals, objectives, and policies set forth in the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 1 of Appendix G of this Draft EIR. Provided below is a general discussion of whether the Project would conflict with any applicable goals, objectives, and policies of the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect.

(i) Land Use Chapter

The Project would support and would be consistent with the applicable goals, objectives, and policies of the Land Use Chapter adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would develop a diversity of uses on the Project Site to support the housing, employment, and commercial needs of existing and future residents, businesses, and visitors of the Arts District. Development of the Project would require the re-designation of an industrial site for a mixed-use development that would be consistent and compatible with other surrounding uses in the Arts District. In addition, the building design and heights would be generally consistent with the scale and character of the existing and proposed developments in the Arts District.

The Project Site is in an area well-served by public transit, including multiple local and regional Metro bus lines, and the Greyhound Bus Terminal, and has adequate public

services and utility infrastructure to service the Project. The Project would enhance pedestrian activity by siting retail and restaurant uses on the ground level of the proposed new buildings, installing new landscaping and streetscape improvements around the Project Site, and providing an extensive paseo system that would connect to East 7th Place and Violet Street and include a variety of pedestrian amenities. The Project would also provide bicycle parking spaces on the Project Site. Thus, the Project would provide opportunities for walking and biking, thereby promoting an improved quality of life and facilitating a reduction in vehicle trips, vehicle miles traveled, and air pollution.

Therefore, the Project would not conflict with the applicable goals, objectives, and policies in the Land Use Chapter of Framework Element.

(ii) Housing Chapter

The Project would support the objectives and policies of the Housing Chapter by developing up to 347 new live/work units on the Project Site in a designated HQTAs and TPAs. There are multiple local and regional bus lines that operate in the vicinity of the Project Site. In addition, the Greyhound Bus Terminal, which provides inter-city bus service to various locations outside of the Los Angeles, is located approximately 0.3 mile west of the Project Site on 7th Street. The Project's location near transit will serve to reduce VMT. Therefore, the Project would not conflict with the applicable objectives and policies in the Housing Chapter of the Framework Element.

(iii) Open Space and Conservation Chapter

The Project would provide approximately 71,719 square feet of open space and recreational amenities on the Project Site for residents and visitors. On the ground floor, the Project would provide a publicly accessible pedestrian paseo system with art exhibition spaces, landscaped planters, and various gathering and seating areas. Other open space and recreational amenities would include residential indoor common amenity spaces on Level 9 of the residential tower and on Level 8 of the office building, and outdoor amenities for both residents and office tenants on Levels 4 and 8 of the office building. Therefore, the Project would not conflict with the applicable objectives and policies in the Open Space and Conservation Chapter of the Framework Element.

(iv) Economic Development Chapter

The Economic Development Chapter contains economic development policies that were not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The Project would develop new commercial and residential uses in an area that would have convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips, VMT, and air pollution to ensure maximum feasible environmental

quality. Thus, the Project would provide residents with a range of housing opportunities, access to local services, and access to transportation, which would allow future residents to both live and work in the Project vicinity. Moreover, the Project Site currently contains only a small amount of warehouse uses (2,109 square feet), all of which would be retained. Therefore, the Project would not displace and existing industrial uses. In addition, the Project would meet the criteria to change the site's industrial land use designation. As such, the Project would not conflict with the applicable objectives and policies in the Economic Development Chapter of the Framework Element.

(v) Infrastructure and Public Services Chapter

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, the Project would support the City's objective for reducing stormwater runoff and protecting water quality by implementing a SWPPP during construction that would include BMPs to minimize the discharge of pollutants in stormwater runoff and managing stormwater runoff during operation in accordance with the City's LID Ordinance requirements. In addition, as discussed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, LADWP would be able to meet the water demand for the Project, as well as existing and planned water demands of its future service area. Furthermore, the Project would incorporate appropriate lighting that would be designed to minimize light trespass from the Project Site and would comply with all LAMC requirements. Therefore, the Project would not conflict with the applicable goals, objectives, and policies in the Infrastructure and Public Services Chapter of the Framework Element.

(vi) Conclusion

Based on the analysis above, the Project would not conflict with the relevant goals, objectives, and policies of the Framework Element.

(b) Mobility Plan 2035

The Project's general consistency with the applicable goals, objectives, and policies set forth in Mobility Plan 2035 adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 2 of Appendix G of this Draft EIR. Provided below is a general discussion of whether the Project would conflict with any applicable goals, objectives, and policies of Mobility Plan 2035 adopted for the purpose of avoiding or mitigating an environmental effect.

The Project would support the City's policy to provide for safe passage of all modes of travel during construction by implementing a construction traffic management plan that incorporates safety measures around the construction site to reduce the risk to pedestrian activity near the work area; minimizes the potential conflicts between construction activities,

street traffic, transit stops, and pedestrians; and reduces congestion to public streets and highways. The Project would also support the City's policy to ensure high quality pedestrian access and to provide a safe and comfortable walking environment by installing landscaping and streetscape improvements and providing an extensive pedestrian paseo system on the Project Site with a variety of pedestrian amenities. In addition, the Project would promote the City's policy to recognize all modes of travel by providing adequate vehicular and pedestrian access and providing bicycle facilities. Furthermore, given the Project's proximity to multiple public transit options, the Project would provide all residents, employees, and visitors convenient access to transit services. These measures would serve to reduce VMT. **Therefore, the Project would not conflict with the applicable policies in Mobility Plan 2035.**

(c) Los Angeles General Plan Housing Element

The Project's consistency with the applicable policies set forth in the Housing Element of the General Plan is detailed in Table 3 of Appendix G of this Draft EIR. Specifically, as discussed therein, the Project would provide up to 347 market rate and affordable units in close proximity to commercial uses and transit, which would serve to reduce VMT. The Project would also promote the construction of sustainable buildings that would incorporate design features to reduce energy and water usage, and reduce solid waste. **Therefore, the Project would not conflict with the applicable policies and objectives in the Los Angeles General Plan Housing Element.**

(d) Los Angeles General Plan Conservation Element

The City's Conservation Element primarily addresses preservation, conservation, protection, and enhancement of the City's natural resources. These include agricultural lands, archaeological and paleontological resources, endangered species, habitat areas, and mineral resource areas. As discussed in the Initial Study, included as Appendix A, and in Section VI, Other CEQA Considerations, of this Draft EIR, the Project would have no impact on agricultural lands, endangered species, habitat areas, or mineral resource areas. In addition, as discussed in Section IV.B, Cultural Resources, of this Draft EIR, Building C was previously identified by SurveyLA as a historic resource, but as evaluated therein, the Project would not result in direct impacts to this historic resource or indirect impacts to any nearby historic resources. The Project would comply with regulatory requirements to protect archaeological resources and would implement mitigation to reduce potential impacts to paleontological resources. Therefore, the Project would not conflict with Section 5 of the Conservation Element. Furthermore, as analyzed in Section VI, Other CEQA Considerations, the Project would not obstruct existing public views of any scenic vistas or visual resources. Thus, the Project would not conflict with Section 15 of the Conservation Element, which encourages protection of scenic vistas and the preservation of public views of visual resources. **As such, the Project would not conflict with the applicable policies and objectives Conservation Element.**

(e) Central City North Community Plan

The Project's consistency with the applicable goals, objectives, and policies set forth in the Community Plan is discussed in detail on Table 4 of Appendix G of this Draft EIR. Specifically, the Project would not conflict with Objective 1-2 which calls for locating new housing in a manner that reduces vehicular trips and makes it accessible to services and facilities by constructing 347 new live/work units within an HQTAs and TPAs. The Project would also provide additional opportunities for new commercial development and services by developing approximately 187,374 square feet of new office space and 21,858 square feet of new retail/restaurant floor area.

The Project design and improvements would enhance pedestrian activity and promote walkability consistent with Policies 2-2.2 and 2-2.3. The Project would not conflict with Goal 12 of the Community Plan which encourages alternative modes of transportation because of the Project Site's proximity to a various of public transit options and to nearby commercial and offices uses, and the provision of bicycle parking spaces on site would also promote alternative modes of transportation that would reduce vehicle trips. Furthermore, the Project would implement a TDM Program to promote non-auto travel and reduce the use of single-occupant vehicle trips consistent with Policy 12-1.3. **Based on the analysis above, the Project would not conflict with the goals, objectives, and policies of the Community Plan adopted for the purpose of avoiding or mitigating an environmental effect.**

(2) Los Angeles Municipal Code

The Project Site is zoned M3-1-RIO (Heavy Industrial, Height District 1, River Improvement Overlay). The M3 designation permits a wide variety of industrial, manufacturing, and storage uses, as well as office and commercial uses, but does not allow for residential uses. The "1" indicates that the Project Site is located in Height District 1, which does not specify a building height limit, but limits the Floor Area Ratio (FAR) to 1.5:1. The RIO designation indicates that the Project Site is located within the River Improvement Overlay (RIO) District.

The Project would develop new live-work units, and new office and retail/restaurant uses on the Project Site. These new uses would be located in a 36-story residential tower with a maximum height of 425 feet and an eight-story office building with a maximum height of 131 feet. In addition, five existing buildings containing office, retail, restaurant, and warehouse uses, as well as live-work units would be retained. Upon completion, up to 569,448 square feet of floor area would be located within the Project Site, including the existing floor area to remain, resulting in a maximum FAR of 6.0:1.

Development of the Project would require a Vesting Zone and Height District Change from M3-1-RIO to C2-2-RIO and a corresponding General Plan Amendment to the Community Plan to change the land use designation from Heavy Industrial to Regional Center Commercial. The proposed C2-2-RIO zone would permit construction of the proposed live-work units. The C2 zone in conjunction with the proposed Regional Center Commercial land use designation permits 1 dwelling unit per 200 square feet of lot area for mixed-use developments such as the Project. The Project Site is 94,946 square feet after street dedications, which would permit a maximum of 474 dwelling units. The Project would construct up to 347 new live/work units and retain 6 existing units, which would result in a total unit count of 353 dwelling units. The total number of units would be below the maximum number of units permitted. The proposed C2-2-RIO zone would permit a 6:1 FAR, which equates to a total of 569,676 square feet of floor area based on 94,946 square feet of lot area after street dedications. The 569,448 square feet of floor area proposed by the Project would be below the maximum floor area permitted by the 6:1 FAR restriction.

Based on LAMC requirements for the proposed land uses and existing uses to remain, the Project would be required to provide 783 vehicle parking spaces and 257 bicycle parking spaces (47 short-term and 210 long term).⁸⁶ The Project would provide 828 vehicle parking spaces and 257 bicycle parking spaces, which would exceed LAMC requirements. Vehicular parking spaces would be located within six subterranean parking levels. Short-term bicycle parking spaces would be provided on the ground level while long-term bicycle parking spaces would be provided within six subterranean parking levels. The Project also would comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking area.

The Project would also seek the approval of a Vesting Tentative Tract Map for the merger and re-subdivision of the Project Site into three lots and for residential and commercial condominiums; a Vesting Conditional Use Permit to permit floor area averaging and residential density transfer within a unified development; a Master Conditional Use Permit for the on-site sale of a full-line of alcoholic beverages within the Project's commercial areas; and an affordable housing development incentive to permit zero-foot side yards in lieu of 16 feet otherwise required for the residential levels along the eastern property line. The Project would to set aside a minimum of 5 percent of the total units for Extremely Low-Income households and 11 percent of the total units for Very Low Income households to comply with LAMC 11.5.11.

⁸⁶ *The Project is requesting to utilize LAMC residential parking standards in lieu of the residential condominium parking standards of the Deputy Advisory Agency's parking policy.*

With approval of the requested discretionary actions, the Project would be consistent with applicable LAMC requirements.

(3) Redevelopment Plan for the Central Industrial Redevelopment Project

The Project Site is designated for Light Industrial land uses according to Exhibit No. 1, Redevelopment Plan Map, in the Redevelopment Plan, and is subject to a base 3:1 FAR limit according to Section 512.1 of the Redevelopment Plan. However, Section 502 of the Redevelopment Plan clarifies that “the land uses permitted in the Project Area shall be those permitted by the General Plan, the applicable Community Plan, and any applicable City zoning ordinance, all as they now exist or are hereafter amended and/or supplemented from time to time. In the event the General Plan, the applicable Community Plan, or any applicable City zoning ordinance is amended or supplemented with regard to any land use in the Project Area, the land use provisions of this Plan, including without limitation, all Exhibits attached hereto, shall be automatically modified accordingly without the need for any formal plan amendment process.” Thus, with approval of the requested General Plan Amendment and Vesting Zone and Height District Change, the Project Site would be re-designated for Regional Center Commercial land uses and zoned M3-1-RIO and would be subject to the permitted uses, height, and densities of the Regional Center Commercial and C2-2-RIO designations. Nonetheless, the Project is subject to review by CRA/LA for conformance with the Redevelopment Plan goals. Table 5 in Appendix G of this Draft EIR evaluates the Project’s consistency with the relevant goals of the Redevelopment Plan. **Therefore, the Project would not conflict with the applicable objectives of the Redevelopment Plan for the Central Industrial Redevelopment Project.**

(4) River Improvement Overlay District

The Project Site is located within the RIO District and would be required to comply with the Los Angeles River Design Guidelines, which establishes best practices for designing development projects located within the RIO District. The Los Angeles River Design Guidelines illustrate options, solutions, and techniques to improve the aesthetic quality of the Los Angeles River and its surrounding communities. The Los Angeles River Design Guidelines consist of overarching objectives followed by a list of specific implementation strategies. These strategies specifically address river-adjacent development. Although the Project is located within the boundaries of the RIO District, the Project Site is separated from the Los Angeles River by existing rail lines and is not immediately adjacent to the River. Nevertheless, the Project would further the relevant objectives, including employing high quality, attractive and distinguishable architecture (Objective 2) and minimizing the quantity and appearance of parking and loading areas by locating all parking and loading areas underground or screened from public view (Objective 4). **Therefore, the Project would not conflict with the River Improvement Overlay District.**

(5) Citywide Design Guidelines

The Citywide Design Guidelines are intended as performance goals and not zoning regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. As detailed below, the Project would not conflict with the applicable Citywide Design Guidelines.

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

Pedestrian access would be provided from adjacent sidewalks. Internally, pedestrian access would be provided via a new paseo that connects the existing buildings with the proposed buildings. The entrance to the residential lobby would be located on the eastern side of the residential tower. Primary pedestrian access to the office component would be from an office lobby located along Violet Street within the northeastern corner of the Project site. Access to the retail/restaurant spaces would be provided via several entrances along the paseo system.

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

Vehicular access to the residential subterranean parking would be provided via a driveway accessible through the alleyway on the western side of the Project Site. Residential loading docks and loading area are located immediately south of the residential parking entrance. Vehicular access to the office subterranean parking would be provided via a driveway located at the southeastern corner of the Project Site along Violet Street. The commercial loading dock and loading area are located immediately adjacent to the office parking entrance. All parking would be enclosed and driveways designed in accordance with all applicable requirements so as to not degrade the pedestrian experience.

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

The Project would provide landscape improvements and streetscape amenities, including landscaped planters and street trees along Violet Street. Pedestrian access within the Project Site would be provided via a new paseo that connects the existing buildings with the proposed buildings. The entrance to the residential lobby would be located on the eastern side of the residential tower. Primary pedestrian access to the office component would be from an office lobby located along Violet Street within the northeastern corner of the Project site. Access to the retail/restaurant spaces would be provided via several entrances along the paseo system. This paseo also provides pedestrian access to the East 7th Place, Violet Street, and the abutting alley. The

enhanced pedestrian environment would encourage non-automobile travel and reduce VMT.

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

As discussed in the Project's Initial Study included as Appendix A of this Draft EIR, the Project Site is located in an urbanized area and is currently developed with seven buildings that comprise approximately 63,530 square feet of floor area and range in height from one to three stories. Landscaping is limited, consisting of 16 ornamental trees and ornamental shrubs within portions of the Project Site. Of the on-site tree species, only one tree, a *Platanus Racemosa* (Sycamore), is of a species that is protected by the LAMC.⁸⁷ The removal of this protected tree is subject to City approval under Ordinance No. 177404, which also requires that this tree be replaced on a 2:1 basis in accordance with the City's requirements set forth in Ordinance No. 177404. The remaining on-site trees would be replaced on a 1:1 basis in accordance with the Department of City Planning's policy.

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

As discussed in Section II, Project Description, of this Draft EIR, the Project's design would incorporate energy-efficient design methods and technologies, such as high performance window glazing; passive energy efficiency strategies, such as façade shading, roof overhangs, and porches; high efficiency domestic heaters; and enhanced insulation to minimize solar heat gain. The Project would also include operable windows, shading of unit fenestration through balcony overhangs to prevent excess heat, use of natural light and installation of photovoltaic panels.

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

As discussed in the Project's Initial Study included as Appendix A of this Draft EIR, the Project would implement either a capture and use system, or biofiltration planters for managing stormwater runoff in accordance with current LID requirements.

Objective 3: Augment the Streetscape Environment with Pedestrian Amenities/ Provide Pedestrian Connections Within and Around the Project.

The Project would provide landscape improvements and streetscape amenities, including landscaped planters and street trees along Violet Street. Pedestrian access

⁸⁷ Carter, Romanek Landscape Architects, Inc., 2143 Violet St. Los Angeles, Existing Tree Survey, April 16, 2018. Refer to Appendix IS-1 of the Initial Study, which is included in Appendix A of this Draft EIR..

within the Project Site would be provided via a new paseo that connects the existing buildings with the proposed buildings. The entrance to the residential lobby would be located on the eastern side of the residential tower. Primary pedestrian access to the office component would be from an office lobby located along Violet Street within the northeastern corner of the Project site. Access to the retail/restaurant spaces would be provided via several entrances along the paseo system. This paseo also provides pedestrian access to the East 7th Place, Violet Street, and the abutting alley. The enhanced pedestrian environment would encourage non-automobile travel and reduce VMT.

Objective 5: Include Open Space to Create Opportunities for Public Gathering/
Utilize Open Areas and Landscape Opportunities to their Full Potential

The Project would provide a publicly accessible pedestrian paseo system on the ground level with art exhibition spaces, landscaped planters, and various gathering and seating areas. Other open space and recreational amenities would include residential indoor common amenity spaces on Level 9 of the residential tower and on Level 8 of the office building, and outdoor amenities for both residents and office tenants on Levels 4 and 8 of the office building. The outdoor amenities on Level 4 of the office building would be comprised of seating areas, an outdoor kitchen, and a fire pit, and Level 8 of the office building would include a swimming pool, lounge areas with fire pits and BBQs, and a variety of other landscaped and programmed open spaces. In addition, private residential balconies would be provided throughout the residential tower. Overall, the Project would provide approximately 71,719 square feet of open space, which exceeds the open space requirements set forth by LAMC Section 12.21 G. In addition, the Project would install street trees and landscaped planters along Violet Street.

Objective 6: Improve the Streetscape Experience by Reducing Visual Clutter.

All proposed signage on the Project Site would be designed in conformance to applicable LAMC requirements. The Project would include low-level exterior lights on the proposed building for security and way-finding purposes. Project lighting would be designed to minimize light trespass from the Project Site. Low-level accent lighting to accent signage, architectural features, and landscape elements would also be incorporated. The Project would also screen any necessary rooftop equipment and locate trash enclosures and utility areas within the building so as not to detract from the visual character of the Project Site. In addition, all major utilities would be placed underground and all equipment and trash areas would be required to be screened from public view. The enhanced pedestrian environment would encourage non-automobile travel and reduce VMT.

(6) City of Los Angeles Walkability Checklist

The Walkability Checklist consists of a list of design elements intended to improve the pedestrian environment, protect neighborhood character, and promote high quality urban form. As stated within the Walkability Checklist, while each of the implementation strategies should be considered for a project, not all will be appropriate for every project, and each project will involve a unique approach. The Walkability Checklist is tailored primarily for the new construction of residential and commercial mixed-use use projects. The Walkability Checklist addresses the following topics, each of which is discussed further below, as applicable: sidewalks; crosswalks/street crossings; on-street parking; utilities; building orientation; off-street parking and driveways; on-site landscaping; building façade; and building signage and lighting.

The Project would incorporate, where applicable, many of the implementation strategies presented in the Walkability Checklist and would implement a number of relevant design elements in order to foster a visually appealing pedestrian environment. The primary objectives defined for sidewalks address facilitating pedestrian movement and enriching the quality of the public realm by providing appropriate connections and street furnishings in the public right-of-way. Recommended implementation strategies that would be incorporated into the Project include creating a continuous and predominantly straight sidewalk and open space; creating a buffer between pedestrians and moving vehicles by the use of landscape and street furniture (i.e., street trees and landscaped planters along Violet Street) providing adequate sidewalk widths; and incorporating closely planted shade-producing street trees.

The Walkability Checklist strategies regarding crosswalks and street crossings do not apply to the Project because the Project does not include crosswalks or street crossings. In addition, the Walkability Checklist strategies regarding on-street parking do not apply to the Project because no internal roadways are located or proposed within the Project Site. Furthermore, as discussed above, sufficient off-street parking would be provided to meet applicable LAMC parking requirements.

The objective of the Walkability Checklist's utilities section is to minimize the disruption of views and visual pollution created by utility lines and equipment. The Project would screen rooftop equipment and locate trash enclosures and utility areas within the building, so as not to detract from the visual character of the Project Site. In addition, all major utilities would be installed underground or within the alley north of the Project Site. Utilities would also be located away from building entrances. As such, the Project would support the implementation strategies related to the undergrounding and screening of utilities.

Within the Walkability Checklist, building orientation addresses the relationship between buildings and the street as a means of improving neighborhood character and the pedestrian environment. In accordance with the recommended implementation strategies, the Project would designate grade level entrances from the public right-of-way for pedestrians. In addition, the primary building entrance would be visible from adjacent streets and accessible from the sidewalk. The Project's extensive window walls on the Project street frontages would create an inviting pedestrian experience to activate the street. Furthermore, the street frontage would also include landscaped planters, street trees, and appropriate lighting, thus creating a visually interesting, comfortable, and safe pedestrian environment.

In terms of off-street parking and driveways, the primary objective of the Walkability Checklist is to ensure pedestrian safety. Recommended implementation strategies that would be incorporated into the Project include maintaining the continuity of the sidewalk; accommodating vehicle access to and from the Project Site with as few driveways as possible; and illuminating all parking areas and pedestrian walkways. The Project would provide a residential parking entrance from the alley and an office parking entrance off of Violet Street. All vehicular parking would be located within the six subterranean parking levels.

The Walkability Checklist also calls for the use of on-site landscaping to contribute to the environment, add beauty, increase pedestrian comfort, add visual relief to the street, and extend the sense of the public right-of-way. As previously described, the Project would install street trees and landscaped planters along Violet Street. In addition, the Project would provide a ground-level landscaped pedestrian paseo system that would connect the existing commercial, office, and residential uses to the new buildings and provide pedestrian access to each of the Project's street frontages, as well as to the abutting alley. In so doing, the Project would achieve the following implementation strategies: providing planting that complements pedestrian movement or views and providing planting that complements the character of the built environment.

The Walkability Checklist objective related to building façades is to create/reinforce neighborhood identity and a richer pedestrian environment. The Project would address many of the relevant implementation strategies, including incorporating different textures, colors, materials, and distinctive architectural features that add visual interest; adding scale and interest to the building façade through articulated massing; reinforcing the existing façade rhythm along the street with architectural elements; discouraging blank walls; contributing to neighborhood safety by providing windows at the street that act as "eyes on the street;" and utilizing the building wall for security between the structure and the street, eliminating the need for fences at the street.

In addition, as intended in the Walkability Checklist, building signage and lighting would be designed to strengthen the pedestrian experience, neighborhood identity, and visual coherence. Project signage and lighting would be designed to achieve the following in support of the Walkability Checklist: including signage at a height and of a size that is visible to pedestrians, assists in identifying the structure and its use, and facilitates access to building entrances; providing adequate lighting levels to safely light pedestrian paths; utilizing adequate, uniform, and glare-free lighting to avoid uneven light distribution, harsh shadows, and light spillage; and using fixtures that are “dark sky” compliant.

Based on the Project elements described above and the analysis herein, the Project would support the applicable Walkability Checklist objectives and implement relevant strategies which would serve to reduce VMT. As such, the Project would be consistent with relevant aspects of the Walkability Checklist

(ii) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS)

The Project’s general consistency with the applicable goals and principles set forth in the 2016–2040 RTP/SCS is analyzed in Table 6 of Appendix G of this Draft EIR. As detailed therein, the Project would not conflict with the applicable goals set forth in the 2016–2040 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2016–2040 RTP/SCS to maximize the productivity of the region’s transportation system as well as protect the environment and health of the region’s residents by improving air quality and encouraging active transportation (e.g., bicycling and walking). The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby transit options. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site’s location within a SCAG-designated HQTAs and TPAs, as defined in the City’s Zoning Information File No. 2452. In addition, the Project would provide bicycle parking spaces for the proposed uses that would serve to promote walking and use of bicycles. The Project would also include adequate parking to serve the proposed uses and would provide charging stations to serve electric vehicle. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and opportunities for walking and biking. **Therefore, the Project would not conflict with the applicable objectives of the 2016–2040 RTP/SCS.**

(iii) Conclusion

Based on the analysis above, the Project would be substantially consistent with applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site. Therefore, the Project would not conflict with applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts related to Threshold (b) and land use policy consistency would be less than significant.

(iv) Spot Zoning

The *L.A. CEQA Thresholds Guide* includes as one its land use screening criteria: “Would the project result in a ‘spot’ zone.” If the answer to the screening question is yes, further analysis is required. However, a spot zone does not in and of itself result in a significant land use impact; it merely requires further analysis. This Chapter includes such further analysis and assesses whether the Project would result in a significant impact under the Appendix G thresholds set forth above. As set forth herein, the Project would not physically divide an established community or, conflict with an applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, or conflict with any applicable habitat conservation plan or natural community conservation plan. **Therefore, the project would not result in a significant land use impact as a result of a spot zone.**

(v) Industrial Displacement

The City has policies and objectives within various documents, which discourage the displacement of industrial land. These policies and objectives are not adopted for the purposes of avoiding an environmental effect; nonetheless, they are discussed in Appendix G of this Draft EIR. The potential impacts from industrial displacement to the physical environment could include, but are not limited to an increase in criteria air pollutants, VMT, and numerous site specific impacts from new construction. These impacts are speculative, as it is beyond the scope of this analysis to determine future possible impacts from a myriad of economic conditions. However, the Project Site currently developed primarily with live/work, office, and commercial uses, and the 2,109 square feet of existing warehouse uses would be retained.

According to the Central City North Community Plan, there are 1,180 acres (approximately 60 percent of the 2,005-acre total) of industrially zoned property in the Community Plan area. The Project Site comprises 2.2 acres, or only approximately 0.2 percent of the industrially zoned land and approximately 0.11 percent of the total land in the Community Plan area. The conversion of industrial land is an economic issue that is not within the scope of CEQA review. As discussed above, these impacts would be speculative, and no industrial uses are currently located on site to be displaced.

Therefore, the Project would not displace any industrial uses, and impacts would be less than significant.

(6) Noise

(a) Construction Noise

(i) Off-Site Noise

In addition to on-site construction noise sources, other noise sources may include materials delivery, concrete mixing, and haul trucks (construction trucks), as well as construction worker vehicles accessing the Project Site during construction. Typically, construction trucks generate higher noise levels than construction worker vehicles. The major noise sources associated with off-site construction trucks would be associated with delivery/haul trucks. Construction delivery/haul trucks would travel between the Project Site and I-10 via Santa Fe Avenue and Violet Street. Trucks leaving the Project Site would exit the Project Site onto Violet Street to Santa Fe Avenue, head south on Santa Fe Avenue to I-10. Trucks coming to the Project Site would exit I-10 westbound at the Santa Fe Avenue exit, make a right on 8th Street, then turn northbound onto Santa Fe Avenue, continue to Violet Street, make a right-turn toward the Project Site.

The peak period of construction with the highest number of construction trucks would occur during the mat foundation phase, which would last approximately four days. During this phase, there would be a maximum of 156 concrete trucks coming to and leaving the Project Site (equal to 312 total truck trips) per day. In addition, there would be a total of 150 worker trips to and from the Project Site on a daily basis during the mat foundation phase. There would also be construction haul/delivery truck trips (up to 272 delivery truck trips per day) during other construction phases of the Project, but such trips would be less than the 312 truck trips under the mat foundation phase.

Table IV.G-13 in Section IV.G, Noise, of this Draft EIR provides the estimated number of construction-related trips, including haul/delivery trucks and worker vehicles, and the estimated noise levels along the anticipated haul route(s). As indicated in Table IV.G-13, the noise levels generated by construction trucks during all stages of Project construction would be below the existing daytime ambient noise levels along Santa Fe Avenue and, therefore, would be below the threshold of significance of 5 dBA above ambient noise level (based on the measured ambient at R2). Therefore, temporary noise impacts from off-site construction traffic would be less than significant.

(b) *Operational Noise*

(i) *On-Site Stationary Noise Sources*

(1) Mechanical Equipment

As part of the Project, new mechanical equipment (e.g., HVAC equipment) would be located at the roof level and within the building structure (e.g., mechanical equipment room). Although operation of this equipment would generate noise, Project-related outdoor mechanical equipment would be designed so as not to increase the existing ambient noise levels by 5 dBA in accordance with the City's Noise Regulations. Specifically, the Project would comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. In addition, as provided above in Project Design Feature NOI-PDF-2, all outdoor mounted mechanical equipment would be enclosed or screened from off-site noise-sensitive receptors. Table IV.G-14 in Section IV.G, Noise, of this Draft EIR, presents the estimated noise levels at the off-site receptor locations from operation of the Project mechanical equipment. As indicated in Table IV.G-14, the estimated noise levels from the mechanical equipment would range from 41.4 dBA (L_{eq}) at receptor location R1 to 45.1 dBA (L_{eq}) at receptor location R2, which would be well below the existing ambient noise levels. As such, the estimated noise levels at all off-site receptor locations would be below the thresholds of significance of 5 dBA (L_{eq}) above ambient noise levels. **Therefore, noise impacts from mechanical equipment would be less than significant.**

(2) Outdoor Spaces

As discussed in Section II, Project Description, of this Draft EIR, the Project would include various outdoor open space areas, including a pedestrian paseo at the ground level; outdoor amenities (seating areas, outdoor kitchen, and a fire pit) on Level 4; and an outdoor deck on Level 8 of the office building, which would include a swimming pool and lounge areas. Noise sources associated with outdoor uses typically include noise from people gathering and conversing. For this operational noise analysis, reference noise levels of 65 dBA for a male and 62 dBA for a female speaking in a raised voice were used for analyzing potential noise impacts from people gathering at the outdoor spaces.⁸⁸ In order to analyze a typical noise scenario, it was assumed that up to 50 percent of the people (half of which would be male and the other half female) would be talking at the same time. In addition, the hours of operation for use of the outdoor areas were assumed to be from 7:00 A.M. to 10:00 P.M.

⁸⁸ Harris, Cyril M., *Handbook of Acoustical Measurements and Noise Control*, Third Edition, 1991, Table 16.1.

An additional potential noise source associated with outdoor uses would be the use of an outdoor sound system (e.g., with music or other sounds broadcast through an outdoor mounted speaker system). As set forth in Project Design Feature NOI-PDF-3, the amplified sound system used in outdoor areas would be designed so as not to exceed the maximum noise levels of 75 to 90 dBA L_{eq} as indicated in Table IV.G-15 in Section IV.G, Noise, of this Draft EIR, thereby ensuring that the amplified sound system would not exceed the significance criteria (i.e., an increase of 5 dBA L_{eq}) at any off-site noise-sensitive receptor location. Table IV.G-15 presents the anticipated number of people at each of the outdoor spaces and the Project's maximum amplified sound levels. To represent a conservative noise scenario, the noise levels from the use of the Project's outdoor spaces were calculated based on the assumption of concurrent use of all the outdoor spaces with the maximum number of people as well as simultaneous use of the amplified sound systems. This represents a conservative, worst case analysis because the Project would not be expected to have all the outdoor spaces at maximum capacity concurrently.

Table IV.G-16 in Section IV.G, Noise, of this Draft EIR, presents the estimated noise levels at the off-site sensitive receptors resulting from the use of outdoor areas. The estimated noise levels were calculated with the assumption that all of the outdoor spaces would be fully occupied and operating concurrently to represent a worst-case noise analysis. As presented in Table IV.G-16, the estimated noise levels from the outdoor spaces would range from 50.5 dBA (L_{eq}) at receptor R3 to 57.9 dBA (L_{eq}) at receptor R1 and would be below the thresholds of significance of 5 dBA (L_{eq}) above ambient noise levels. **As such, noise impacts from the use of the outdoor areas would be less than significant.**

(3) Parking Facilities

As discussed in Section II, Project Description, of this Draft EIR, the Project would provide 828 vehicular parking spaces within six subterranean levels. Sources of noise within the parking garage would primarily include vehicular movements and engine noise, doors opening and closing, and intermittent car alarms. Noise levels within the parking garage would fluctuate with the amount of automobile and human activity. Since the subterranean parking levels would be fully enclosed on all sides, noise generated within the subterranean parking garage would be effectively shielded from off-site sensitive receptor locations in the immediate vicinity of the Project Site. Table IV.G-17 in Section IV.G, Noise, of this Draft EIR, presents the estimated noise levels from the parking operation (mainly noise from vehicle entering/leaving subterranean parking driveways) at the off-site receptor locations. As indicated in Table IV.G-17, the estimated noise levels from the Project parking operation would be well below the thresholds of significance of 5 dBA (L_{eq}) above the ambient noise levels (based on the lowest measured ambient). **Therefore, noise impacts from the parking garage would be less than significant.**

(4) Loading Dock and Trash Collection Areas

The Project would include two loading dock areas at Level 1, one for residential use and one for commercial use. The residential loading docks and loading area would be located at the western side of the residential building, immediately south of the residential parking entrance. The commercial loading dock and loading area would be located immediately to the east of the office building at the southeastern corner of the Project Site along Violet Street. The Project trash rooms would be located in the subterranean parking Level P1 and at the ground level near the residential and commercial loading docks. Noise sources associated with the loading dock and trash collection area would include delivery/trash collection trucks and operation of the trash compactor. Based on measured noise levels from typical loading dock facilities and trash compactors, delivery/trash collection trucks and trash compactors could generate noise levels of approximately 71 dBA (L_{eq}) and 66 dBA (L_{eq}), respectively, at a distance of 50 feet.⁸⁹ The trash rooms (trash compactors) would be effectively buffered from the off-site sensitive receptors as they are located within an enclosed room and within the subterranean parking level. As provided above in Project Design Feature NOI-PDF-4, all loading docks adjacent to off-site sensitive receptors will be designed to be integrated into the building and thus shielded from view by off-site sensitive receptors. Table IV.G-18 in Section IV.G, Noise, of this Draft EIR, presents the estimated noise levels at the off-site receptor locations from operation of the loading docks. As indicated therein, the estimated noise from the loading dock operation range from 32.7 dBA (L_{eq}) at receptor location R1 to 52.3 dBA (L_{eq}) at receptor location R4. The estimated noise levels from the loading dock and trash compactor at all off-site receptor locations would be well below the thresholds of significance of 5 dBA (L_{eq}) above ambient daytime noise levels. **Therefore, noise impacts from loading dock and trash compactor operations would be less than significant.**

(ii) Off-Site Mobile Noise Sources

(1) Future Plus Project

Future roadway noise levels were calculated along the nine roadway segments in the vicinity of the Project Site. The roadway noise levels were calculated using the traffic data provided in the Transportation Study prepared for the Project, which is included in Appendix N.1 of this Draft EIR. As discussed in the Transportation Study, prior to the implementation of TDM measures, the Project is expected to generate 5,318 daily trips. As such, Project-related traffic would increase the existing traffic volumes along the roadway segments in the study area when compared with Future without Project conditions. This increase in roadway traffic was analyzed to determine if any traffic-related noise impacts would result from operation of the Project. Table IV.G-19 in Section IV.G, Noise, of this

⁸⁹ RK Engineering Group, Inc., *Wal-Mart/Sam's Club Reference Noise Level Study, 2003.*

Draft EIR, provides a summary of the roadway noise impact analysis. The calculated CNEL levels are conservatively calculated along the roadways and do not account for the presence of any physical sound barriers or intervening structures. As shown therein, the Project would result in a maximum of a 4.7 dBA (CNEL) increase in traffic noise along the roadway segment of Violet Street (east Santa Fe Avenue). As there is no noise-sensitive receptor along this segment, there are no significant traffic noise impacts along this segment. At other analyzed roadway segments, the increase in traffic-related noise levels would be 1.3 dBA or less. The increase in traffic noise levels would be well below the applicable 3 dBA or 5 dBA CNEL thresholds of significance for off-site noise-sensitive receptors. **Therefore, traffic noise impacts under Future Plus Project conditions would be less than significant.**

(2) Baseline Plus Project

The analysis of traffic noise impacts provided above was based on the incremental increase in traffic noise levels attributable to the Project as compared to Baseline without Project conditions. An additional analysis was performed to determine the potential noise impacts based on the increase in noise levels due to Project-related traffic compared with the baseline traffic noise conditions. As shown in Table IV.G-20 in Section IV.G, Noise, of this Draft EIR, when compared with baseline conditions, the Project would result in a maximum increase of 10.7 dBA (CNEL) in traffic noise along Violet Street (east of Santa Fe Avenue). However, there is no noise-sensitive receptor along this segment, and therefore there are no significant traffic noise impacts along this segment. At other analyzed roadway segments, the increase in traffic-related noise levels would be 1.3 dBA or lower. The estimated increase in traffic noise levels as compared to existing conditions would be well below the relevant 3 dBA CNEL thresholds of significance. Therefore, traffic noise impacts under Baseline plus Project conditions would be less than significant.

(iii) Composite Noise Level Impacts from Project Operations

In addition to considering the potential noise impacts to neighboring noise-sensitive receptors from each specific on-site and off-site noise source (e.g., mechanical equipment, outdoor areas, parking facilities, loading dock and trash compactor, and off-site traffic), an evaluation of potential composite noise level increases (i.e., noise levels from all on-site noise sources combined) at the analyzed sensitive receptor locations was also performed. This evaluation of composite noise levels from all on-site Project-related noise sources, evaluated using the CNEL noise metric, was conducted to determine the contributions at the noise-sensitive receptor locations in the vicinity of the Project Site.

Table IV.G-21 in Section IV.G, Noise, of this Draft EIR, presents the estimated composite noise levels in terms of CNEL at the off-site sensitive receptor locations from the Project-related noise sources. As indicated in Table IV.G-21, the Project would result in an

increase in composite noise levels ranging from 0.4 dBA at receptor location R3 to 2.2 dBA at receptor location R1. The composite noise levels from Project operation at the off-site receptor location R2 would be below the 3-dBA significance criteria as the composite (Project plus ambient) noise level falls within the normally unacceptable (70 to 75 CNEL) land use categories. The composite noise levels at receptor locations R1, R3, and R4 would be below the 5-dBA thresholds of significance as the composite noise levels fall within the conditionally acceptable (60 to 70 CNEL) land use category. As such, composite noise level impacts due to Project operations would be less than significant.

Therefore, Project operations would not result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Operational noise impacts from on- and off-site sources would be less than significant.

(c) Off-Site Construction Vibration

Construction delivery/haul trucks would travel between the Project Site and I-10 via Santa Fe Avenue and Violet Street. Trucks would exit the Project Site onto Violet Street, head west to Santa Fe Avenue, and head south on Santa Fe to I-10. Incoming trucks would exit I-10 at the Santa Fe Avenue off-ramp, turn right onto 8th Street, head north on Santa Fe Avenue, and turn right onto Violet Street to the Project Site. Heavy-duty construction trucks would generate ground-borne vibration as they travel along the Project's anticipated haul route(s). Thus, an analysis of potential vibration impacts using the building damage and human annoyance criteria for ground-borne vibration along the anticipated local haul routes was conducted.

Regarding building damage, based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.00566 PPV) at a distance of 50 feet from the truck.⁹⁰ According to the FTA “[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads.” Nonetheless, there are existing buildings along the Project's anticipated haul route that are situated approximately 20 feet from the right-of-way and would be exposed to ground-borne vibration levels of approximately 0.022 PPV, as provided in the noise calculation worksheets included in Appendix H of this Draft EIR. This estimated vibration generated by construction trucks traveling along the anticipated haul route(s) would be well below the most stringent building damage criteria of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, vibration impacts (pursuant to the thresholds of significance for

⁹⁰ FTA, “Transit Noise and Vibration Impact Assessment,” September 2018, Figure 5-4.

building damage) from off-site construction activities (i.e., construction trucks traveling on public roadways) would be less than significant.

Per FTA guidance, the thresholds of significance for human annoyance is 72 VdB for residential and hotel and 65 VdB for studio (recording/broadcast) uses. It should be noted that buses and trucks rarely create vibration that exceeds 70 VdB at 50 feet from the receptor unless there are bumps in the road.⁹¹ There are no vibration sensitive uses (i.e., residential, hotel and recording studios) along Violet Street (between the Project Site and Santa Fe). The estimated vibration levels generated by construction trucks traveling along Santa Fe Avenue were assumed to be within 30 feet of the sensitive use (future hotel use at receptor R4). As indicated in the noise calculation worksheets included in Appendix H of this Draft EIR, the temporary vibration levels could reach approximately 70 VdB periodically as trucks pass sensitive receptors along the anticipated haul route(s) (at 30 feet). Therefore, the future hotel uses (receptor R4) along Santa Fe Avenue would be exposed to ground-borne vibration up to 70 VdB, which would be below the 72-VdB threshold of significance from the construction trucks. In addition, the recording studio (receptor R3) is located approximately 160 feet from the haul routes. The estimated vibration level from construction trucks along the haul routes would be 48 VdB at receptor R3, which would be well below the 65 VdB significance threshold. Therefore, potential vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the anticipated haul route(s) would be less than significant.

Based on the above, the estimated vibration levels associated with temporary and intermittent vibration from off-site construction activities (i.e., construction trucks traveling along the anticipated haul route(s)) would be well below the most stringent 0.12 PPV significance threshold pursuant to building damage (for buildings along the anticipated haul route(s)) and below the human annoyance significance threshold of 72 VdB at the future hotel use (receptor R4). Therefore, vibration impacts associated with off-site construction activities would be less than significant with respect to both building damage and human annoyance at all receptors.

(d) Operational Vibration

Sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. As also discussed above, vehicular-induced vibration, including vehicle circulation within the subterranean parking area, would not generate perceptible vibration levels at off-site sensitive uses. Building

⁹¹ FTA, "Transit Noise and Vibration Impact Assessment," September 2018, p. 113.

mechanical equipment installed as part of the Project would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission so vibration would not be perceptible at the off-site sensitive receptors. **Therefore, operation of the Project would not increase the existing ambient vibration levels in the immediate vicinity of the Project Site and would not result in the generation of excessive ground-borne vibration levels. As such, vibration impacts associated with operation of the Project would be less than significant.**

(7) Public Services—Fire Protection

(a) Construction

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. In most cases, implementation of good housekeeping procedures by the construction contractors and work crews would minimize these hazards. Construction activities also have the potential to affect fire protection services by adding construction traffic to the street network and by necessitating partial lane closures during street improvements and utility installations, including the required upgrades to the water mains in 7th Place and Violet Street. These impacts would be less than significant for the following reasons:

- Construction impacts are inherently temporary in nature and do not cause lasting effects that would impact LAFD fire protection services.
- In accordance with OSHA regulations set forth in 29 CFR, Part No. 1926, construction managers and personnel would be trained in emergency response and fire safety operations and fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.
- Partial lane closures would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for dealing with traffic pursuant to California Vehicle Code (CVC) Section 21806, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic.
- Impacts that could temporarily affect emergency response are addressed through the Construction Traffic Management Plan, prepared for the Project pursuant to Project Design Feature TR-PDF-1 in Section IV.I, Transportation, of this Draft EIR. Project Design Feature TR-PDF-1 will ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Project would also employ temporary traffic controls, such as flag persons to control traffic movement during temporary traffic flow

disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way.

Based on the above, Project construction would not affect fire protection services to the extent that new or physically altered fire facilities would be needed in order to maintain acceptable service ratios, response distances, or other performance objectives for fire protection services. Therefore, construction-related impacts on fire protection would be less than significant.

(b) Operation

(i) Facilities and Equipment

The Project Site would continue to be served by Fire Station No. 17, the “first-in” station for the Project Site, located approximately 0.6 mile south of the Project Site. Fire Station No. 17 is equipped with an assessment engine, paramedic rescue ambulance, foam tender, HazMat tender, arson investigation unit, and a staff of eight. In addition, Fire Station No. 9, located 1.4 miles northwest of the Project Site, is equipped with an assessment engine, assessment truck, BLS rescue ambulance, and staff of 12. As such, the Project Site is located within the required 1.0-mile engine company and 1.5-mile truck company response distances and the LAFD considers fire protection to be adequate.⁹² Furthermore, as shown in Table IV.H.1-1 in Section IV.H.1, Public Services—Fire Protection, although located beyond the specified response distance requirements, Fire Station Nos. 4 and 2 have been identified by the LAFD as capable of initial responses needed at the Project Site.

The Project’s development of 347 new live-work units would introduce a new residential population of 840 persons, based on the most recent estimated household size of 2.42 persons per unit for multi-family housing units in the City of Los Angeles.⁹³ When accounting for the removal of four existing live-work units on the Project Site, the net population increase would be 830 persons. In addition, based on employee generation rates included in the Los Angeles Unified School District’s (LAUSD) Developer Fee

⁹² *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 16, 2018*

⁹³ *Based on a rate of 2.42 persons per multi-family unit based on the 2017 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019*

Justification Study, the Project's 187,374 square feet of new office space, 21,858 square feet of new retail/restaurant floor area, and 926 square-foot community room that residents could use for art creation would generate approximately 961 employees.⁹⁴ Therefore, the Project's population would increase the demand for LAFD fire protection services, which could, in turn, result in a need for new or physically altered government facilities.

However, the Project would implement Los Angeles Building and Fire Code requirements, including, but not limited to, structural design, building materials, site access, clearances, hydrants, fire flow, storage and management of hazardous materials, alarm and communications systems, and building sprinkler systems. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, prior to the issuance of a building permit. In addition, as described above, the Project, which would include high-rise structures, is required by the LAMC Section 57.4705.4 to provide an EHLF, as described in Subsection 2.a.(3)(e) or to implement one of two alternate options to an EHLF. The Project would comply with Option 2 of LAFD Requirement No. 10 and acquire approval from the Fire Marshal for this option. In compliance with Option 2, the Project would provide all applicable life safety features, including automatic fire sprinklers, a video camera surveillance system, egress stairways, fire service access elevators, stairways with roof access, enclosed elevator lobbies, and escalator openings or stairways.

(ii) Emergency Access

Operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access within and in the vicinity of the Project Site. Furthermore, the area surrounding the Project Site includes an established street system, consisting of freeways, primary and secondary arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation within the Project's traffic study area. Based on the Project Site's location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard. Additionally, drivers of emergency vehicles have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel, pursuant to CVC Section 21806. As such, emergency access to the Project Site and surrounding uses would be maintained at all times, and the increase in traffic

⁹⁴ *The 2018 LAUSD Developer Fee Justification Study does not include an employee generation rate for artist production space. To provide a conservative estimate, the highest generation rate (i.e., Standard Commercial Office) was used.*

generated by the Project would not significantly impact emergency vehicle response to the Project Site and surrounding uses, including along City-designated disaster routes. Furthermore, the Project's driveway and internal circulation would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access.

Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit.

(iii) Fire Flow

As described in Section IV.K.1, Utilities and Service Systems—Water Supply, of this Draft EIR, domestic and fire water service to the Project Site would continue to be supplied by LADWP. Fire flow to the Project would be required to meet City fire flow requirements. As previously discussed, LAMC Section 57.507.3.1 establishes fire flow standards by development type. The Project falls within the Industrial and Commercial category, which has a required minimum fire flow of 6,000 gpm to 9,000 gpm from four to six adjacent fire hydrants flowing simultaneously with a minimum pressure of 20 psi at full flow, which translates to 1,500 gpm per hydrant. Additionally, hydrants must be spaced to provide adequate coverage of the building exterior.

As discussed in the Utility Report, included as Appendix E of this Draft EIR, the Information of Fire Flow Availability Report (IFFAR) submitted to LADWP shows six nearby hydrants flowing simultaneously for a combined 7,000 gpm. Therefore, under existing conditions, the Project Site does not currently have adequate fire flow to demonstrate compliance with LAMC Section 57.507.3. However, the Project would include necessary upgrades to improve the surrounding water mains that would facilities flow and pressure requirements. Specifically, as discussed in the Utility Report included as Appendix E of this Draft EIR, the Project may require construction of new public water mains within the public right of way. This work would include replacing the existing 6-inch mains in both 7th Place and Violet Street and may require supplementary water main construction in Santa Fe Avenue.

Furthermore, in accordance with LAFD Regulation No. 10 Option 2, the Project will incorporate a fire sprinkler suppression system to reduce or eliminate public hydrant demands, which will be subject to LAFD review and approval during the design and permitting phase of the Project. The maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gpm. As part of the Utility Report, a Service Advisory Report (SAR) was submitted to LADWP to determine if the existing public water

infrastructure could meet the demands of the Project. Based upon the SAR results, LADWP outlined potential improvements to the water supply infrastructure that may be necessary. The planned upgrades to the water mains near the Project Site would be sufficient to provide the necessary flow and pressure.

(iv) Conclusion

Based on the above analysis, the Project is not anticipated to generate a demand for additional fire facilities. Project operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. Therefore, impacts to fire protection during Project operation would be less than significant, and no mitigation measures are required.

(8) Public Services—Police Protection

(a) Construction

Project construction would not generate a permanent population on the Project Site that would substantially increase the police service population of the Newton Area. The existing residential and commercial uses on the Project Site currently generate a residential and daytime population that may require police protection services. The demand for police protection services during construction of the Project Site would be offset by the removal of four existing live/work units on the Project Site. Furthermore, the daytime population at the Project Site during construction would be temporary in nature. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Pursuant to Project Design Feature POL-PDF-1, the Applicant would implement temporary security measures including security fencing, lighting, and locked entry to secure the Project Site during construction. With implementation of these measures, potential impacts associated with theft and vandalism during construction activities would be reduced, resulting in less demand for police protection services and associated government facilities.

Project construction activities could also potentially impact LAPD police protection services and response within the Newton Area due to construction impacts on the surrounding roadways. As discussed in Section IV.I, Transportation, of this Draft EIR, access to the Project Site and the surrounding vicinity could be impacted by Project-related construction activities, roadway/access improvements, utility line construction, and the generation of traffic as a result of construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic.

Although construction activities would be short-term and temporary for the area, Project construction activities could affect police response to sites along Violet Street, Santa Fe Avenue, and other main connectors due to travel time delays caused by traffic during the construction phase. However, Violet Street does not provide through traffic near the Project Site. Also, given the permitted hours of construction and nature of construction projects, most, if not all, of the construction worker trips would occur outside the typical weekday commuter A.M. and P.M. peak periods, reducing the potential for traffic-related conflicts. In addition, a construction traffic management plan, including a worksite traffic control plan, would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 in Section IV.I, Transportation a construction management plan to be prepared for the project, to ensure that adequate and safe access is available within and near the Project Site during construction activities. Features of the construction traffic management plan would be developed in consultation with the Los Angeles Department of Transportation (LADOT) and may include narrowing lanes adjacent to the Project Site and scheduling the receipt of construction materials during non-peak travel periods. Appropriate construction traffic control measures (e.g., signs, flag persons, etc.) would also be utilized to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, construction-related traffic generated by the Project would not significantly impact LAPD response within the Project vicinity as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806.

Based on the above analysis, compliance with state law, construction-related impacts would be minimized and would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site. Project construction would not necessitate the provision of new or physically altered government facilities in order to maintain the LAPD's capability to serve the Project Site; accordingly, the Project would not result in adverse physical impacts associated with the construction of new or altered facilities. Therefore, impacts on police protection services during Project construction would be less than significant.

(b) Operation

As discussed in Section II, Project Description, of this Draft EIR, upon buildout, the Project Site would include 353 live-work residential units, 194,357 square feet of office space, 47,597 square feet of retail and restaurant uses, 2,109 square feet of warehouse space, and a 926 square-foot community room that residents could use for art creation. As

such, the Project would introduce a new residential, employee, and visitor population to the Project Site and increase the police service population of the Newton Area.⁹⁵

As discussed above, the Project Site is served by the Newton Community Police Station located at 3400 South Central Avenue, approximately 2.8 miles southwest of the Project Site. The Newton Community Police Station is staffed by 323 sworn officers and a 32-person civilian support staff. As shown in Table IV.H.2-2 in Section IV.H.2 Public Services—Police Protection, of this Draft EIR, the Project's estimated net police service population would be 1,801 persons, including permanent residents and daytime workers. Of this total, the Project would generate approximately 1,089 residents, which would increase the existing LAPD residential service population in the Newton Area from approximately 150,000 persons to 151,089 persons. The increase in residential police service population would result in an officer-to-resident ratio of 2.14 officers per 1,000 residents for the Newton Area, which currently has 2.15 officers per 1,000 residents. Therefore, the Project would not cause a significant change to the officer-per-resident ratio for the Newton Area.

As shown in Table IV.H.2-1 in Section IV.H.2 Public Services—Police Protection, of this Draft EIR, 5,917 crimes were reported in the Newton Area in 2019, which equates to a crime rate of approximately 39.5 crimes per 1,000 residents or 0.0395 crime per capita. Based on the assumption that the annual crime rate would remain constant at 0.0395 crime per capita, the Project's net residential service population could potentially generate approximately 43 new crimes per year.⁹⁶ This would increase the annual number of crimes reported in the Newton Area from 5,917 to 5,960 reported crimes per year, an increase of approximately 0.7 percent.

As provided above in Project Design Features POL-PDF-2 through POL-PDF-7, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site. Specifically, as set forth in Project Design Feature POL-PDF-2, the Project would include a closed circuit camera system and keycard entry for the residential buildings and the residential parking areas. In addition, pursuant to Project Design Features POL-PDF-3 and POL-PDF-4, the Project would include proper lighting of buildings and walkways to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. The Project would also design entrances to and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding

⁹⁵ *When calculating service ratios, LAPD considers only the residential service population of the service area.*

⁹⁶ *Total crimes generated by the Project = estimated crime rate of 0.0395 crime per capita × net Project residential service population of 1,089 persons = approximately 43 crimes.*

sites, as provided in Project Design Feature POL-PDF-5. Furthermore, as specified in Project Design Features POL-PDF-6, the Applicant would submit a diagram of the Project Site to the LAPD showing access routes and other information that might facilitate police response. The Project's design features would help offset the Project-related increase in demand for police services and minimize the need for new or altered facilities. Therefore, the Project's impact on police services would be less than significant. In addition to the implementation of these project design features, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate.

The Project would introduce new uses to the Project Site which would generate additional traffic in the Project vicinity. Project-related traffic would have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. Drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Accordingly, Project operation, including traffic generated by the Project, would not cause a substantial delay in emergency response to the Project area due to traffic congestion. In addition, as is the case under existing conditions, emergency vehicles would access the Project Site directly from the surrounding roadways. Operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding uses would be maintained at all times. Therefore, the Project would not cause a substantial adverse impact on emergency response and impacts would be less than significant.

Based on the above analysis, the Project operation would not necessitate the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain LAPD's capability to serve the Project Site. Thus, impacts to police protection services would be less than significant.

Furthermore, as described in Subsection 3.b.(1), consistent with *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project and the protection of the public safety is the first responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Thus, the need for additional police protection services is not an environmental impact that CEQA requires a project proponent to mitigate.

(9) Public Services—Schools

(a) Construction

The Project would generate part-time and full-time jobs associated with construction of the Project between the start of construction and Project buildout. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. Therefore, the construction employment generated by the Project would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. **Therefore, it is not anticipated that new or physically altered government facilities, the construction of which would cause significant environmental impacts, would be required and impacts would be less than significant.**

(b) Operation

The Project would directly generate students through the development of live-work units. As noted above, the Project would retain a portion of existing live-work units and warehouse uses and develop new office uses, retail/restaurant uses, and artist production amenity space. Such non-residential components of the Project could generate students as employees of the non-residential uses may relocate to the Project Site vicinity. As shown in Table IV.H.3-3 on in Section IV.H.3, Public Services—Schools, of this Draft EIR, using the applicable LAUSD student generation rates for the Project's land uses, the Project would generate approximately 388 new students consisting of 211 elementary school students, 57 middle school students, and 120 high school students. As also shown in Table IV.H.3-3, the existing uses within the Project Site currently generate approximately 27 students consisting of 15 elementary school students, 4 middle school students, and 8 high school students. Thus, when accounting for the removal of the existing on-site uses, buildout of the Project would result in a net increase of 361 students consisting of 196 elementary school students, 53 middle school students, and 112 high school students.

It should be noted that the number of Project-generated students who could attend LAUSD schools serving the Project Site would likely be less than the above estimate because this analysis does not include LAUSD options that would allow students generated by the Project to enroll at other LAUSD schools located away from their home attendance area, or students who may enroll in private schools or participate in home-schooling. In addition, this analysis does not account for Project residents who may already reside in the school attendance boundaries and would move to the Project Site. Other LAUSD options, some of which are discussed above, that may be available to Project students include the following:

- Open enrollment that enables students anywhere within the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats;
- Magnet schools and magnet centers such as Hollenbeck Middle School (Law/Public Service; Science/Technology/Engineering/Math/Medicine), Theodore Roosevelt High School (Science/Technology/Math), Euclid Avenue Elementary School (Gifted/Science/Technology/Engineering/Arts/Math), and Stevenson Middle School (Communication Arts, Gifted), which are open to qualified students in the LAUSD;
- The Permits With Transportation Program, which allows students to continue to go to the schools within the same feeder pattern of the school they were enrolled in from elementary through high school.⁹⁷ The LAUSD provides transportation to all students enrolled in the Permits With Transportation Program regardless of where they live within the LAUSD;
- Intra-district parent employment-related transfer permits that allow students to enroll in a school that serves the attendance area where the student's parent is regularly employed if there is adequate capacity available at the school;
- Sibling permits that enable students to enroll in a school where a sibling is already enrolled; and
- Child care permits that allow students to enroll in a school that serves the attendance area where a younger sibling is cared for every day after school hours by a known child care agency, private organization, or a verifiable child care provider.

Based on capacity and existing enrollment data from LAUSD, 9th Street Elementary School, Hollenbeck Middle School, and Boyle Heights Zone of Choice high schools would not have adequate capacity to accommodate the new students generated by the Project under existing conditions. Specifically, with the addition of Project-generated students, the 9th Street Elementary School would have a seating shortage of 113 students (i.e., existing seating availability for 83 students minus the Project student generation of 196 students), Hollenbeck Middle School would have a seating shortage of 454 students (i.e., existing shortage of 401 students in addition to the Project student generation of 53 students), and Boyle Heights Zone of Choice high schools would have a seating shortage of 799 students (i.e., existing shortage of 687 students in addition to the Project student generation of 112 students).

⁹⁷ A feeder pattern is the linkage from elementary school, middle school, and high school.

In considering projected future enrollment data from LAUSD, similar to existing conditions, none of the Project-serving schools would have adequate capacity to accommodate the new students generated by the Project under projected future conditions. Specifically, 9th Street Elementary School would have a seating shortage of 174 students (i.e., future seating availability for 22 students minus the Project student generation of 196 students), Hollenbeck Middle School would have a seating shortage of 316 students (i.e., future shortage of 263 students in addition to the Project student generation of 53 students), and Boyle Heights Zone of Choice high schools would have a seating shortage of 557 students (i.e., future shortage of 445 students in addition to the Project student generation of 112 students) under projected future conditions. However, LAUSD does not have a capital improvement plan to address future facility needs and has not established a threshold for provision of these new facilities. LAUSD may consider presenting a local bond measure to voters in the near future to raise capital for facility modernization and new construction.⁹⁸ In addition, no new school construction is currently planned.⁹⁹

Even if new schools were to be required, pursuant to SB 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of the Project's building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered full and complete mitigation of Project-related school impacts. Therefore, payment of the applicable development school fees to the LAUSD would offset the potential impact of additional student enrollment at schools serving the Project Site.

As such, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.

(10) Public Services—Parks and Recreation

(a) Facilities

(i) Public Recreation Plan

As discussed in Section II, Project Description of this Draft EIR, the Project Site is currently developed with seven buildings that comprise approximately 63,530 square feet

⁹⁸ LAUSD, *Facilities Services Division, 2017 Facilities Services Division Strategic Execution Plan*.

⁹⁹ *Letter from Rena Perez, Director of Master Planning & Demographics, LAUSD Facilities Services Division, dated July 25, 2018. See Appendix K of this Draft EIR.*

of floor area and range in height from one to three stories and are used for 6,983 square feet of office, 25,739 square feet of retail, 2,109 square feet of warehouse use, and 10 live-work units comprised of 28,699 square feet. The Project Site also includes two sheds and surface parking areas. As the Project would remove four existing live-work units, an estimated 10 fewer people would be located on-site.¹⁰⁰ However, the Project proposes to develop 347 new live-work units within the Project Site, which would generate 840 residents. Thus, the Project would result in a net residential population of 830 residents. Therefore, the population increase associated with the Project would generate additional demand for parks and recreational facilities in the Project vicinity.

As previously stated, the Public Recreation Plan parkland guidelines are Citywide goals and do not constitute requirements for individual development projects. Based on the estimated 830 residents that would be generated by the Project, the Project would need to provide approximately 1.7 acres of neighborhood parkland to meet the Public Recreation Plan's long-range standard of 2 acres per 1,000 residents and approximately 0.8 acre to meet the Public Recreation Plan's more attainable short- and intermediate-range standard of 1 acre per 1,000 residents. Similarly, the Project would need to provide 1.7 acres of community parkland to meet the Public Recreation Plan's long-range standard for community parks of 2 acres per 1,000 residents and approximately 0.8 acre to meet the Public Recreation Plan's more attainable short- and intermediate-range standard of 1 acre per 1,000 residents.

The Project would include approximately 1.25 acres (54,369 square feet) of common open space, which would consist of a variety of open space features and recreational amenities that serve the needs of residents. The Project's 1.25 acres of common open space would fall short of the acreage required to meet the Public Recreation Plan's long-, intermediate-, and short-range standards for neighborhood and community parks. However, due to the Project's inclusion of common open space and recreational opportunities such as seating areas, outdoor kitchens, BBQs, and landscaped areas, the use of such amenities existing community parks in the area would be reduced. Notwithstanding, Project residents would still be expected to utilize neighborhood and community park amenities, including sports facilities, open space, and children's play areas.

Compliance with regulatory requirements would ensure that the intent of the Public Recreation Plan's parkland standards would be met through compliance with State law as enforced through applicable LAMC requirements related to the provision and/or funding of

¹⁰⁰ *Based on a rate of 2.42 persons per multi-family unit based on the 2017 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.*

parks and recreational spaces. Such requirements include the provision of on-site open space; payment of the Dwelling Unit Construction Tax; and with the Project requiring approval of a Vesting Tentative Tract Map, as well as a zone change, compliance with the City's Quimby Act requirements through the dedication of parkland, payment of in-lieu fees, or provision of on-site recreational amenities and open space areas, or through a combination of these methods.

(ii) Los Angeles Municipal Code

LAMC Section 12.21-G requires that residential developments containing six or more dwelling units on a lot provide a minimum square footage of usable open space per dwelling unit. Based on the proposed dwelling unit types, the Project would be required to provide a total of 42,775 square feet of usable open space, as shown in Table IV.H.4-2 in Section IV.H.4, Public Services—Parks and Recreation, of this Draft EIR. The Project would provide a total of 71,719 square feet of usable open space consisting of 54,369 square feet of common open space (e.g., swimming pool, lounge areas, fitness centers) and 17,350 square feet of private open space (e.g., patios, balconies) for its residents. Thus, the Project would exceed the LAMC's requirement for the provision of usable open space.

According to LAMC Section 12.21-G, common open space must constitute at least 50 percent of the total required usable open space requirement. Therefore, the Project would be required to provide a minimum of 21,388 square feet of common open space. The Project would exceed the requirements of LAMC Section 12.21-G via the provision of 54,369 square feet of common open space, which would constitute approximately 76 percent of the total usable open space provided. The Project would also include a ground-level pedestrian paseo that connects the existing and proposed buildings.

Additionally, pursuant to LAMC Section 12.21-G, a minimum of 25 percent of the required common open space must be planted with ground cover, shrubs, and trees. Therefore, the Project would be required to provide a minimum of 5,347 square feet of landscaped common open space. The Project would provide approximately 8,491 square feet of landscaping within the ground level pedestrian paseo and within the outdoor amenity spaces on Levels 4 and 8 of the office building. Therefore, the Project would be consistent with this provision of the LAMC. Furthermore, Section 12.21-G requires one 24-inch box tree per four dwelling units. Based on the new 347 dwelling units proposed by the Project, 87 trees would be required. As the Project would provide a total of 129 trees on-site, the Project would be consistent with this provision of the LAMC.

In addition, LAMC Section 12.21-G generally requires that common open space be open to the sky; however, enclosed recreation rooms of at least 600 square feet or greater may count as common open space but cannot qualify for more than 25 percent of the total

required usable open space. The Project would provide 2,008 square feet of indoor residential amenities on Level 9 of the residential tower, 926-square-foot community room on the ground level of the office building, and additional indoor amenities on Level 8 of the office building. These indoor amenities would meet the minimum 600-square-foot size requirement set forth in LAMC Section 12.21-G. In total, the Project would provide 10,527 square feet of indoor common areas, or approximately 24.6 percent of the total open space required. Therefore, these enclosed areas would not exceed the 25 percent maximum, and the Project would be consistent with this provision of the LAMC.

As previously stated, the City's current Park Fee Ordinance, including amendments to LAMC Sections 12.33 and 17.12, was adopted in order to mitigate the park- and open space-related impacts of new residential development projects. Although the Project would not include dedicated parkland, as stated above, LAMC Section 12.33 provides that certain on-site recreational facilities may be credited against a project's land dedication requirement if approved by the Advisory Agency. However, there is the potential that some or all of the Project's recreational amenities may not be credited toward the Project's land dedication requirement, in which case the Project would be required to pay in-lieu fees as determined by the City. Through one or a combination of these methods, as determined by the City, impacts with regard to compliance with LAMC Sections 12.33 and 17.12 would be less than significant.

(iii) Central City North Community Plan

The Project would support the objectives and policies of the Central City North Community Plan through the provision of new on-site open space, recreational amenities, and landscaping, as discussed above, which would offset the demand that would be generated by Project residents for public parks and recreational facilities in the Community Plan area. In the absence of public land in the surrounding developed area, the Project would develop and provide a feasible use of recreational sites and facilities for its residents. In addition, as suggested in the Community Plan, the Project would incorporate lighting and safety features in its design. Low-level exterior lights would be installed on the building and along pathways for security and wayfinding features. During Project operation, 24-hour security would monitor entrances and exits, manage and monitor the fire/life/safety systems, patrol the perimeter of the property, and control and monitor activities in the public spaces and private outdoor areas. As such, the Project would support Community Plan objectives and policies to ensure accessibility, security, and safety to users of the recreational amenities and open space. In addition, Project development would not diminish the quality or accessibility of, or result in the removal of, existing parks or recreational facilities in the Community Plan area. As such, impacts with respect to consistency with the Central City North Community Plan would be less than significant.

(iv) Conclusion

In determining the Project's potential impacts to parks and recreational facilities, this analysis evaluates the potential demand of Project residents for public parks and recreational facilities, as well as the Project's consistency with applicable plans, policies, and regulations related to parks and recreational facilities. As discussed above, due to the amount, variety, and availability of the Project's proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site open space to meet their recreational needs. Furthermore, the Project would meet the applicable requirements set forth in LAMC Sections 12.21, 17.12, 12.33, and 21.10.3(a)(1) regarding the provision of useable open space and the dedication of parkland or the payment of in-lieu fees. The Project would not meet the parkland provision goals set forth in the Public Recreation Plan. However, as previously indicated, these are Citywide goals and are not intended to be requirements for individual development projects. Furthermore, the Project would ensure that the intent of the Public Recreation Plan's parkland standards would be met through compliance with State law as enforced through applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces. **Thus, the Project would not result in the need for new or physically altered parks and recreation facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios and standards. Impacts would be less than significant, and no mitigations measures are required.**

*(b) Use of Existing Parks**(i) Construction*

Construction of the Project would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on the Project is negligible.

During Project construction, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. There is a potential for construction workers to spend their lunch breaks at parks and recreational facilities that may be located in proximity to the Project Site (i.e., less than 0.5 mile). However, any resulting increase in the use of such parks and recreational facilities would be temporary and negligible. Furthermore, it is unlikely that workers would utilize parks and recreational facilities beyond a 0.5-mile radius from the Project Site, as lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes). All parks within a 2-mile radius of the Project are at least 0.5 mile from the

Project Site. Therefore, it is unlikely that construction workers would utilize any parks and recreational facilities near the Project during Project construction.

There are no parks or recreational facilities adjacent to the Project Site along Violet Street or Santa Fe Avenue. Therefore, Project construction would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site or interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity. As described in Section IV.I, Transportation, of this Draft EIR, the Project's proposed haul route option from the Project Site would include use of Violet Street and Santa Fe Avenue to/from I-10 and I-605. The haul route would not travel on streets adjacent to any public park or recreational facility. Therefore, use of this haul route would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site or interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity.

Thus, based on the above, Project construction would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity. **Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population of the Project vicinity or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site, and, as such, a substantial physical deterioration of parks and recreational facilities would not occur or be accelerated. Accordingly, impacts on parks and recreational facilities during Project construction would be less than significant.**

(ii) Operation

The Project would introduce a net new residential population of approximately 830 persons, based on the most recent estimated household size of 2.42 persons per unit for multi-family housing units in the City of Los Angeles area.¹⁰¹

The Project would include various open space and recreational amenities to serve residents and guests. Specifically, on the ground floor, the Project would feature a 12,280-square-foot pedestrian paseo system as well as 926-square-foot community room within

¹⁰¹ Based on a rate of 2.42 persons per multi-family unit based on the 2017 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.

the office building. In the office building, Level 4 would include 3,499 square feet of outdoor amenities, while Level 8 would include 28,063 square feet of additional outdoor amenities. Level 8 of the office building would also provide 7,593 square feet of indoor amenities. In the residential tower, Level 9 would also include 2,008 square feet of indoor residential amenities. The Project would provide amenities such as a swimming pool, seating areas with barbecues and fire pits, a fitness center, and lounge space. In addition, the Project would provide 17,350 square feet of private residential patios/balconies. In total, the Project would provide 71,719 square feet of open space, exceeding the 42,775 square feet required by LAMC Section 12.21-G.

Due to the amount, variety, and availability of the proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site open space to meet their recreational needs. Thus, while the Project's 830 net new residents would be expected to utilize off-site public parks and recreational facilities to some degree, the amenities included in the Project would reduce demand for these facilities and as a result, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities. Similarly, while the Project's non-residential components could result in indirect demand for parks and recreational facilities, such indirect demand would be partially off-set by the removal of the Project Site's existing uses and the provision of on-site open space which would be available to employees. Furthermore, as discussed below, the Project would pay in-lieu parkland fees in accordance with LAMC Sections 12.33 and 17.12. **Therefore, the Project would not 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. As such, impacts would be less than significant.**

(c) Construction of Recreational Facilities

The Project does not include the construction or expansion of a park or recreational facility. In addition, as detailed above, the Project would comply with regulations regarding open space and recreational facilities. Furthermore, although the Project would introduce a residential population that would generate a demand for parks and recreational facilities, Project residents would be anticipated to utilize the Project's on-site open space and recreational facilities to a greater extent than off-site facilities, thereby reducing demand for these off-site facilities. **Therefore, the Project would not include or require the construction or expansion of recreational facilities that would result in adverse physical effects on the environment. As such, impacts would be less than significant.**

(11) Public Services—Libraries

(a) Construction

Construction of the Project would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, Project-related construction workers would not result in a notable increase in the resident population within the service area of the Benjamin Franklin Branch Library, Little Tokyo Branch Library, Robert Louis Stevenson Branch Library, or the Central Library or an overall corresponding demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers would visit Project-area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (i.e., 30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Furthermore, it is unlikely that construction workers would utilize library facilities at the end of the work day, and would instead likely use library facilities local to their place of residence. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible.

As such, construction of the Project would not exceed the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the LAPL. Project construction would not substantially increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. **Therefore, Project construction would not result in the need for new or physically altered governmental facilities, and impacts would be less than significant.**

(b) Operation

Based on information provided by the LAPL, the Project Site is located within the service areas of the Benjamin Franklin Branch Library, Little Tokyo Branch Library, Robert Louis Stevenson Branch Library, and the Central Library.¹⁰² These four libraries are

¹⁰² *Written communication from Tom Jung, Senior Management Analyst I, Los Angeles Public Library, September 27, 2018. See Appendix M of this Draft EIR.*

located within a 2-mile radius of the Project Site, the distance that is generally considered to comprise the service area of a library.¹⁰³

As discussed in the Initial Study prepared for the Project, which is included as Appendix A of this Draft EIR, according to the Department of City Planning, the most recent estimated household size for multi-family housing units in the City of Los Angeles area is 2.42 persons per unit.¹⁰⁴ The Project Site currently includes 10 live-work units. With application of this factor, the Project Site currently includes approximately 24 residents. Development of 347 live-work units would result in an increase of approximately 840 new residents.¹⁰⁵ The Project would remove four of the ten existing units on the Project Site, which would reduce the existing residential population on-site to 15 residents.¹⁰⁶ Therefore, the Project would result in a net residential population of 830 persons.¹⁰⁷ As such, the Project's population would increase the demand for library services as compared to existing conditions. However, as noted above, the recommended building size standards are not a threshold under CEQA or LAPL and there is no requirement to build new facilities or expand when the recommended building size standards are not met and LAPL does not make new building decisions based on any one project, but rather on the overall needs of the community.

According to the LAPL, the Benjamin Franklin Branch Library's current service population is approximately 40,319 persons. With the addition of the Project's 830 new residents, the service population of the Benjamin Franklin Branch Library would increase to 41,149 persons. As noted above, under existing conditions, the Benjamin Franklin Branch Library does not currently meet the building size recommendations set forth in the 2007 Branch Facilities Plan. The facility would, therefore, continue to be undersized with the addition of the Project's 830 new residents. Since there are currently no plans to expand this library or develop additional facilities to serve the area, this library will continue to operate without meeting the recommended building size standards.

The Little Tokyo Branch Library's current service population is approximately 45,796 persons. With the addition of the Project's 830 new residents, the service

¹⁰³ *L.A. CEQA Thresholds Guide, Section K.5, pg. K.5-2.*

¹⁰⁴ *Based on a rate of 2.42 persons per multi-family unit based on the 2017 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.*

¹⁰⁵ *347 live-work units × 2.42 persons per unit = 840 persons.*

¹⁰⁶ *10 live-work units × 2.42 persons per unit = 24 persons. The Project would remove 4 existing units (4 units × 2.42 persons per unit = 10 persons).*

¹⁰⁷ *840 new persons – 10 existing persons to be removed = 830 net population.*

population would increase to 46,626 persons. As noted above, under existing conditions, the Little Tokyo Branch Library does not currently meet the building size recommendations set forth in the 2007 Branch Facilities Plan. The facility would, therefore, continue to be undersized with the addition of the Project's 830 new residents. Since there are currently no plans to expand this library or develop additional facilities to serve the area, this library will continue to operate without meeting the recommended building size standards.

The Robert Louis Stevenson Branch Library's current service population is approximately 35,629 persons. With the addition of the Project's 830 new residents, the service population would increase to 36,459 persons. As noted above, under existing conditions, the Robert Louis Stevenson Branch Library does not currently meet the building size recommendations set forth in the 2007 Branch Facilities Plan. Therefore, the facility would continue to be undersized with the addition of the Project's 830 new residents. Since there are currently no plans to expand this library or develop additional facilities to serve the area, this library will continue to operate without meeting the recommended building size standards.

The Central Library's current service population is approximately 3,792,662 persons. With the addition of the Project's 830 new residents, the service population would increase to 3,793,492 persons. The 2007 Branch Facilities Plan recommends the addition of a second branch for communities with populations above 90,000 persons. However, as previously stated, there are three other branch libraries within a 2-mile radius of the Project Site. As also discussed above, because it serves as the LAPL headquarters and is not a branch library, the 2007 Branch Facilities Plan's recommended building size standards are not used to evaluate the Central Library.

With regard to anticipated library service at Project buildout, as discussed in the Initial Study prepared for the Project, which is included in Appendix A of this Draft EIR, the Southern California Association of Governments (SCAG) projects population growth for the City of Los Angeles Subregion. According to SCAG's 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), the population of the City of Los Angeles Subregion is projected to grow by approximately 4.08 percent between 2018 (the Project's baseline year) and 2024 (the Project's build-out year).¹⁰⁸ As shown in Table IV.H.5-4 in Section IV.H.5, Public Services—Libraries, of this Draft EIR, applying this same growth rate to the service area of the Benjamin Franklin Branch Library, Little Tokyo Branch Library, and Robert Louis Stevenson Branch Library, and Central Library,

¹⁰⁸ According to SCAG's 2016–2040 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2018 was approximately 4,009,193 persons (based on a linear interpolation of 2012–2040 data). In 2024, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,172,886 persons (based on a linear interpolation of 2012–2040 data).

the estimated service populations for these libraries in 2024 would be 41,965 persons, 47,665 persons, 37,083 persons, and 3,947,403 persons, respectively. This future service population estimate is conservative, considering that all four libraries would provide library services to the new residents generated by 2024, and not all new residents would utilize the four libraries equally.

Thus, with the addition of the Project's 830 new residents, the service population of the 9,656-square-foot Benjamin Franklin Branch Library would be 42,795 persons in 2024. The 6,000-square-foot Robert Louis Stevenson Branch Library would have an estimated service population of 37,913 persons in 2024. The 12,500-square-foot Little Tokyo Branch Library would have an estimated service population of 48,495 persons in 2024. As such, as is the case under existing conditions, these libraries would continue their operations without meeting the recommended building size standards (i.e., 12,500 square feet for a service population of less than 45,000 persons and 14,500 square feet for a service population of more than 45,000 persons).

With the addition of the Project's 830 new residents, the service population of the 538,000-square-foot Central Library would be 3,948,233 persons in 2024. However, as discussed above, because it serves as the LAPL headquarters and is not a branch library, the 2007 Branch Facilities Plan's recommended building size standards are not used to evaluate the Central Library.

The *L.A. CEQA Thresholds Guide* also considers whether a project includes features that would reduce the demand for library services. The Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities that studies have shown to reduce demand at physical library locations, thus reducing the need for new or physically altered government facilities.^{109,110} Furthermore, there is no requirement to build new facilities or expand when the recommended building size standards are not met and LAPL does not make new building decisions based on any one project, but rather on the overall needs of the community.

With regard to the potential for the employees of the proposed uses to utilize nearby library facilities, based on employee generation rates included in the 2018 LAUSD Developer Fee Justification Study, the Project's 187,374 square feet of new office space, 21,858 square feet of new retail/restaurant floor area, and 926-square-foot community

¹⁰⁹ *Troll, Denise A., How and Why Libraries are Changing: What We Know and What We Need to Know, Carnegie Mellon University, 2002.*

¹¹⁰ *Tenopir, Carol, "Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies," 2003.*

room would generate approximately 961 employees.¹¹¹ These proposed uses would include a range of full-time and part-time positions that are typically filled by persons already residing in the vicinity of their workplace, and who already generate a demand for the libraries in the vicinity of the Project Site. As such, any indirect or direct new demand for library services generated by employees of the proposed neighborhood-serving commercial uses would be negligible.

Based on the above, and pursuant to the library sizing standards recommended in the 2007 Branch Facilities Plan, operation of the Project would not create any new exceedance of the capacity of the Benjamin Franklin Branch Library, Little Tokyo Branch Library, and Robert Louis Stevenson Branch Library, and Central Library. Under both existing and future conditions, without or with the Project, the Benjamin Franklin Branch Library and Robert Louis Stevenson Branch Library would continue operations without meeting the recommended building standards. LAPL has indicated there are currently no plans to expand these facilities or construct new library facilities in the area, and the LAPL does not have a capital infrastructure plan. However, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, and business tax, etc.)¹¹² that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project area, as deemed appropriate. The Project's revenue to the General Fund would help offset the Project-related increase in demand for library services. **Therefore, the Project would not result in the need for new or altered facilities, the construction of which would cause significant environmental impacts. As such, impacts on library facilities during operation of the Project would be less than significant.**

(12) Transportation

(a) Consistency with Applicable Programs, Plans, Ordinances, and Policies

Table 2.1-2 in the TAG provides screening questions to determine which plans, policies, and programs apply to a project. Based on those questions, the following apply to the Project: Mobility Plan policies 2.1, 2.3, 2.4, 2.10, 2.17, 3.2, 3.5, 3.8, 3.9, 3.10, 4.1, 4.13, 5.1, 5.4, and 5.5; Mobility Plan Transit Enhanced Network, Pedestrian Enhanced Network, and Bicycle Enhanced Network Programs; Mobility Plan programs ENG.9, ENG.19, PK.1, PK.7, PK.8, PL.1, PL.13, and PS.3; Mobility Plan Chapter 3 Access for All; Transit Oriented Community Guidelines; and LADOT MPP Section 321. In addition, an

¹¹¹ *The 2018 LAUSD Developer Fee Justification Study does not include an employee generation rate for artist production space. To provide a conservative estimate, the highest generation rate (i.e., Standard Commercial Office) was used.*

¹¹² *City of Los Angeles, Budget for the Fiscal Year 2018–19.*

analysis of the Central City North Community Plan is also provided. The Project's potential to conflict with these programs, plans, ordinances, and policies are analyzed below.

(i) *Mobility Plan 2035*

(1) Mobility Plan Policies

Policy 2.1 Adaptive Reuse of Streets—Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands: The Project will not alter adjacent streets or the right-of-way in a manner that would preclude or conflict with future changes by various City departments. Therefore, the Project would not conflict with Mobility Plan Policy 2.1.

Policy 2.3 Pedestrian Infrastructure—Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment: As discussed above, the Project is not located in a Pedestrian Enhanced District, but the Project would improve pedestrian infrastructure with the addition of new sidewalks around the Project Site perimeter, pedestrian lighting, and a paseo within the Project Site. Therefore, the Project would not conflict with Mobility Plan Policy 2.3.

Policy 2.4 Neighborhood Enhanced Network—Provide a slow speed network of locally serving streets: The Project frontages are not on streets that are part of the Neighborhood Enhanced Network. Therefore, the Project would not conflict with Mobility Plan Policy 2.4.

Policy 2.10 Loading Areas—Facilitate the provision of adequate on and off-street loading areas: The Project proposes curbside passenger loading zones along Violet Street, which is a cul-de-sac east of the intersection of Violet Street and Santa Fe Avenue. As such, passenger loading activity would likely have a minimal impact on the surrounding street network. The Project also proposes a loading dock for residential uses off of the alleyway and a loading dock for the office and restaurant uses immediately adjacent to the office parking entrance. The loading docks would be accessed on the Project Site, which would result in a minimal impact on the surrounding street network and the loading docks would not encroach on or block the public right-of-way. Therefore, the Project would not conflict with Mobility Plan Policy 2.10.

Policy 2.17 Street Widenings—Carefully consider the overall implications (cost, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, even when the existing right of way does not include a curb and gutter or the resulting roadway would be less than the standard dimension: While this is a citywide policy that does not apply directly to the Project, the Project would not conflict with its

implementation. The Project is dedicating three feet of right-of-way along the Violet Street and 7th Place frontages to conform with the street classifications in the Mobility Plan, but no street widening is proposed. Therefore, the Project would not conflict with Mobility Plan Policy 2.17.

Policy 3.2 People with Disabilities—Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way: There are no pedestrian sidewalks along Violet Street between the Project Site and Santa Fe Avenue, and the adjacent parcel currently utilizes this area for parking. However, the Project proposes to add new Americans with Disabilities Act (ADA)-compliant sidewalks along the perimeter of the Project. The Project would not inhibit the future ability of the adjacent parcel or the City to provide sidewalks along the adjacent parcel's frontage. Therefore, the Project would not conflict with Mobility Plan Policy 3.2.

Policy 3.5 Multi-Modal Features—Support “first-mile, last-mile solutions” such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders: The Project Site does not include a transit station or bus stop. Nevertheless, the Project would support multi-modal travel with bicycle amenities such as bicycle parking and a self-service bicycle repair area, as well as pedestrian amenities such as the addition of new sidewalks and a paseo within the Project Site. Therefore, the Project would not conflict with Mobility Plan Policy 3.5.

Policy 3.8 Bicycle Parking—Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities: The Project will provide short- and long-term bicycle parking in accordance with LAMC requirements. Specifically, the Project is required to provide and would provide 47 short-term bicycle parking spaces and 210 long-term bicycle parking spaces. Therefore, the Project would not conflict with Mobility Plan Policy 3.8.

Policy 3.9 Increased Network Access—Discourage the vacation of public rights-of-way: The Project Site is adjacent to an alley located along its western edge. The Project will not restrict alley access, proposes to dedicate 2.5 feet along the alley, and proposes a full-access residential driveway off of the alley. The Project does not propose vacation of the alley. Therefore, the Project would not conflict with Mobility Plan Policy 3.9.

Policy 3.10 Cul-de-sacs—Discourage the use of cul-de-sacs that do not provide access for active transportation options: The Project Site is located on Violet Street, which is a cul-de-sac east of the intersection of Violet Street and Santa Fe Avenue. The current cul-de-sac cannot provide bicycle and pedestrian access due to the railroad tracks located east of the Project Site; the Project would not modify this cul-de-sac and no new cul-de-sacs are proposed. Therefore, the Project would not conflict with Mobility Plan Policy 3.10.

Policy 4.1 New Technologies—Support new technology systems and infrastructure to expand access to transportation choices: The Project does not propose elements that would limit or preclude the City’s ability to offer or introduce new technology systems or infrastructure. Therefore, the Project would not conflict with Mobility Plan Policy 4.1.

Policy 4.13 Parking and Land Use Management—Balance on-street and off-street parking supply with other transportation and land use objectives: The Project would provide subterranean parking within the Project Site. The Project is required to provide and would provide 759 vehicle parking spaces, which is reduced from 817 due to the provision of bicycle parking spaces. The Project will also implement TDM program, as discussed further under Threshold (b), below. This program is intended to reduce vehicle trips and would include unbundled residential parking, which lowers the cost of purchasing or renting a dwelling unit and can function as an incentive to minimize auto ownership. Therefore, the Project would not conflict with Mobility Plan Policy 4.13.

Policy 5.1 Sustainable Transportation—Encourage the development of a sustainable transportation system that promotes environmental and public health: As discussed above in the analyses for Policies 3.5 and 3.8, the Project would encourage the development of a sustainable transportation system with its provision of bicycle parking, self-service bicycle parking area, addition of new sidewalks, and pedestrian paseo. Therefore, the Project would not conflict with Policy 5.1.

Policy 5.4 Clean Fuels and Vehicles—Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure: While this is a citywide policy that does not apply directly to the Project, the Project would not conflict with its implementation. As discussed in Section IV.C, Greenhouse Gas Emissions, of this Draft EIR, the Project would comply with the City’s EV charging requirements which specify that 10 percent of new parking spaces would require EV charging equipment. In addition, 30 percent of all new parking spaces would be required to be EV “ready” meaning they will be capable of supporting future EV charging equipment. Therefore, the Project would not conflict with Mobility Plan Policy 5.4.

(2) Transit Enhanced Network, Pedestrian Enhanced Districts, and Bicycle Enhanced Network

As discussed above, the Project Site is not located within a Pedestrian Enhanced District or along a Transit Enhanced Network or Bicycle Enhanced Network. Nevertheless, as discussed above in the analyses for Policies 2.3 and 3.8, the Project would encourage pedestrian and bicycle activity. With respect to transit, the Project is located within walking distance of multiple bus stops and approximately 1.5 miles south of the Metro Gold Line Little Tokyo/Arts District Station and the Metro Gold Line Pico/Aliso Station. In addition, Metro is evaluating the West Santa Ana Branch Transit Corridor which will connect

Downtown Los Angeles to southeast Los Angeles County via a new light rail line.¹¹³ Current proposals include a station in the Arts District, located near the intersection of Alameda Street and 7th Street, approximately 0.5 mile northwest of the Project Site. Given the distance between the Project Site and the proposed rail line and station, Project construction would not interfere with its development. Therefore, the Project would not conflict with Mobility Plan policies related to the Transit Enhanced Network, Pedestrian Enhanced Districts, and the Bicycle Enhanced Network.

(3) Mobility Plan Programs

Mobility Plan Program ENG.9 directs the city to continue the Green Alleys program to introduce low-impact development stormwater features and improve the overall quality and safety of neighborhood alleys. The Project does not propose any features that would preclude the City from adding green elements to the public right-of-way. Therefore, the Project would not conflict with Mobility Plan Program ENG.9.

Mobility Plan Program ENG.19 discusses first/last mile improvements near transit stops that could include measures such as landscaping, lighting, signage, and midblock crosswalks, among other options. The Project would contribute to first/last mile enhancements with bicycle parking and the addition of new sidewalks. Therefore, the Project would not conflict with Mobility Plan Program ENG.19.

Mobility Plan Program PK.1 directs the Department of City Planning, LADOT, and council offices to work with communities, businesses, and organizations to identify and implement creative strategies to resolve parking conflicts in areas with high parking demand, which currently do not include the Arts District. Based on LAMC requirements for the proposed land uses and existing uses to remain, the Project would be required to provide 783 vehicle parking spaces and the Project would provide 828 vehicle parking spaces located within six subterranean parking levels. Therefore, the Project would not conflict with Mobility Plan Program PK.1.

Mobility Plan Program PK.7 requires off-street dock and/or loading facilities for all new non-residential buildings and for existing non-residential buildings undergoing extensive renovations and/or expansion whenever practical in non-industrial areas. While the Arts District is an industrial area, as discussed above in the analysis for Policy 2.10, the Project would provide a loading dock off the alleyway and a loading dock for the office and restaurant uses immediately adjacent to the office parking entrance. The loading docks will

¹¹³ *Metro, West Santa Ana Branch Transit Corridor, www.metro.net/projects/west-santa-ana/, accessed April 20, 2020.*

not encroach on or block the public right-of-way. Therefore, the Project would not conflict with Mobility Plan Program PK.7.

Mobility Plan Program PK.8 encourages the designation of on-street loading areas, through removal of curb parking, in established industrial areas where off-street loading facilities are lacking. As discussed above in the analysis for Policy 2.10 and Program PK.7, the Project's loading docks would be located within the Project Site and will not encroach on or block the public right-of-way. Therefore, the Project would not conflict with Mobility Plan Program PK.8.

Mobility Plan Program PL.1 requires driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement. The proposed residential driveway is located in the alleyway and the commercial driveway is located on Violet Street, which is a collector street. Therefore, the Project would not conflict with Mobility Plan Program PL.1.

Mobility Plan Program PL.13 is a citywide program to explore the use of special materials use within public rights-of-way. This program does not apply to the Project because no changes to the adjacent rights-of-way are proposed as part of the Project. Therefore, the Project would not conflict with Mobility Plan Program PL.13.

Mobility Plan Program PS.3 is a citywide program to explore the development of a connected network of walking passageways utilizing both public and private spaces, local streets, and alleyways to facilitate circulation. The Project improves pedestrian circulation by adding new sidewalks and a paseo within the Project Site. Therefore, the Project would not conflict with Mobility Plan Program PS.3.

(4) Mobility Plan Chapter 3: Access for All

Chapter 3 of the Mobility Plan emphasizes the importance of multi-modal networks as integral components of the City's transportation system. The Project location and design are intended to leverage proximity to multiple Metro bus routes that also connect to Metro rail stations. The Project's design is providing vehicle parking, bicycle parking, improved pedestrian access, and on-site loading areas for passenger loading and deliveries. Therefore, the Project would not conflict with Mobility Plan Chapter 3.

(ii) Transit Oriented Community Guidelines

The Transit Oriented Community (TOC) Guidelines provide the eligibility standards, incentives, and other necessary components of the TOC program. While the Project Site is located in a Tier 3 TOC, the Project is not seeking incentives under the TOC program. Therefore, the TOC Guidelines do not apply to the Project.

(iii) LADOT Manual of Policies and Procedures Section 321

MPP Section 321 provides the basic criteria for review of driveway designs. MPP Section 321 recommends that two-way driveways for multi-family residential developments with more than 25 spaces and commercial developments are 30 feet in width. The proposed driveways will comply with the City's applicable requirements. MPP 321 also allows up to two driveways for up to 400 feet of street frontage. The Project proposes two driveways, and thus does not propose more driveways than allowed by the City's maximum standard. Therefore, the Project would not conflict with MPP Section 321.

(iv) Central City North Community Plan

(1) Policies

Policy 2-2.2 and Policy 2-3.1 New Development needs to add to and enhance the existing pedestrian street activity: The Project would add new sidewalks around the perimeter of the Project Site. Therefore, the Project would not conflict with Community Plan Policies 2-2.2 and 2-3.1.

Policy 2-2.3 and Policy 2-3.4 Require that the first floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses: Although the Project is not located in a pedestrian oriented district, the Project proposes commercial uses for the ground floor of the building. Therefore, the Project would not conflict with Community Plan Policies 2-2.3 and 2-3.4.

Policy 12-1.1 Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex time, bicycles, and walking, etc.). As discussed further below, Mitigation Measure TR-MM-1 requires the development of a TDM Program for the Project. Specific strategies included for the Project's office component include a required commute trip reduction program and promotions and marketing regarding alternative modes of transportation. Therefore, the Project would not conflict with Policy 12-1.1.

Policy 12-1.3 Require that proposals for new non-residential development projects included submission of a TDM Plan to the City. As discussed above under Policy 12-1.1, Mitigation Measure TR-MM-1 requires the development of a TDM Program for the Project. The final TDM program will be approved by LADOT prior to the City's issuance of a certificate of occupancy for the Project. Therefore, the Project would not conflict with Policy 12-1.3.

Policy 12-1.4 TDM measures in Central City North should be consistent with adopted City policy. One of the TDM strategies recommended for the Community Plan

area aims to limit vehicle trip generation for new development by requiring new commercial and industrial development projects to limit peak period vehicle trips to 85 percent of that forecasted for the project (i.e., as compared to trip generation rates used to determine project traffic impacts) or to achieve a 1.5 peak period Average Vehicle ridership among employees. As discussed in the Transportation Study included as Appendix N.1 of this Draft EIR, LADOT's VMT Calculator was used to quantify the potential VMT reduction for the Project due to implementation of the TDM measures proposed for the Project. The VMT Calculator incorporates research conducted by Fehr & Peers under contract to the California Air Pollution Control Officers Association (CAPCOA, 2010) and elsewhere. It considers a variety of TDM strategies and the setting in which they may apply, estimates effectiveness for each, and applies caps when appropriate (for example, simply aggregating the effectiveness of individual TDM measures can sometimes yield a result that is overestimated since more than one measure may be targeting the same trip). As shown in Table 14 in the Transportation Study, with the TDM program, the daily work VMT per employee associated with the commercial office component of the Project is estimated to be reduced by 18 percent. Therefore, the Project would not conflict with Policy 12-1.4.

Policy 13.1.4 Encourage the provision of changing rooms, showers, and bicycle storage at new and existing and non-residential developments and public places [sic]. While the Project does not propose changing rooms or showers, the Project is required to provide and would provide 47 short-term and 210 long-term bicycle parking spaces, and will also provide a self-service bike repair area. Therefore, the Project would not conflict with Policy 13.1.4.

(2) Transportation Improvement and Mitigation Plan

Street Reclassifications: The TIMP proposes implementation a new street classification, local industrial, in the Central City North area. None of the streets along the Project frontages are classified as local industrial. Therefore, the Project would not conflict with the TIMP's street reclassification program.

Transportation Demand Management (TDM) Program: The TIMP identifies TDM programs and other improvements to enhance safety and mobility in the Community Plan area, such as encouraging the formation of Transportation Management Associations (TMA's) and the continued implementation of the Citywide TDM Ordinance. Policies 12-1.1, 12-1.3, and 12-1.4 discussed above are relevant to the Project. As discussed therein, the Project would not conflict with these policies.

(3) Urban Design Chapter

This section addresses policies in the Urban Design Chapter of the Community Plan that are relevant to the circulation system.

A. Commercial—1. Site Planning—b requires a project to minimize the number of widths of driveways providing sole access to the rear of commercial lots. Vehicular access to the office subterranean parking would be provided via a driveway located at the southeastern corner of the Project Site along Violet Street. Therefore the Project would not conflict with A. Site Planning—1.b.

C. Multiple Residential—3. Parking Structures requires that parking structures be integrated with the design of the buildings they serve. The Project proposes a subterranean parking structure, which will maximize commercial uses on the ground floor as suggested in this policy. Therefore, the Project will not conflict with design policy C. Multiple Residential 3. Parking Structures.

(v) Other Programs, Plans, Ordinances, and Policies

The Project would not conflict with the Plan for a Healthy Los Angeles, LAMC Section 12.26J (TDM Ordinance), Walkability Checklist, or the Mobility Hub Reader's Guide. Specifically, the Project would support the Plan for a Healthy Los Angeles by locating housing near transit, as well as enhancing the pedestrian environment and providing bicycle parking. As discussed in detail in Section IV.F, Land Use, and Appendix G, Land Use Tables, of this Draft EIR, the Project would not conflict with Walkability Checklist policies related to encouraging pedestrian activity and reducing VMT. In addition, the Project would include a TDM Program consistent with LAMC Section 12.26J, as well as Mobility Hub elements, such as bicycle parking and electric vehicle infrastructure. **Therefore, the Project would not conflict with these programs, plans, ordinances, and policies.**

As discussed above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

(b) Hazardous Design Features

As evaluated in the Initial Study for the Project, included as Appendix A of this Draft EIR, the Project does not include hazardous geometric design features. Specifically, pedestrian access to the Project Site would be provided via new sidewalks around the perimeter and through pedestrian plazas/paseos accessible to the neighborhood. Residents, visitors, patrons, and employees arriving to the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking facilities. The Project's access locations would be designed to the City standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. All roadways and driveways will intersect at right angles. Street trees and other

potential impediments to adequate driver and pedestrian visibility would be minimal. Pedestrian entrances separated from vehicular driveways would provide access from the adjacent streets, parking facilities, and transit stops.

With respect to driveways, the Project was analyzed with the following driveway scenario:

- Residential access via a full-access driveway accessible from the alleyway along the western edge of the Project Site; and
- Office and restaurant access via a full-access driveway at the end of Violet Street

Vehicular access to the Project Site is currently available at driveways along Violet Street, East 7th Place, and a public alley that abuts the Project Site to the west. The Project would reduce the number of driveways to two driveways. A loading dock for residential uses will be provided off the alleyway and a loading dock for the office and restaurant uses will be provided on Violet Street.

The driveways would be designed to comply with LADOT standards and would be subject to review by the Los Angeles Department of Building and Safety and the LAFD during the City's plan review process to ensure all applicable safety requirements are met. The driveways would not require the removal or relocation of existing passenger transit stops and would be designed and configured to avoid or minimize potential conflicts with transit services and pedestrian traffic. Additionally, 7th Street, from Vermont Avenue to Mateo Street, is part of the High Injury Network, and there are no driveways proposed on 7th Street. As a result, the Project would not substantially increase hazards or conflicts and would contribute to overall walkability through enhancements to the Project site. **Thus, impacts related to hazardous geometric design features would be less than significant, and no mitigation measures are required.**

(c) Emergency Access

(i) Construction

Construction activities associated with the Project could potentially impact the provision of emergency services by the LAFD and the LAPD in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. The nearest disaster routes to the Project Site are US-101, I-10, and I-5, which are all accessible within less

than 1 mile of the Project Site. Alameda Street is also a designated disaster route located approximately 0.5 mile west of the Project Site.¹¹⁴

As discussed in Subsection 3.c.(2)(a), construction activities associated with the Project (i.e., movement of construction equipment, hauling of soil and materials, daily construction worker traffic, utility line connections, etc.) would potentially impact the public services provided by the LAFD and the LAPD in the vicinity of the Project Site, as a result of construction impacts to the surrounding roadways. As such, these short-term and temporary construction activities could temporarily increase response times for emergency vehicles along Alameda Street and other main connectors due to travel time delays caused by traffic during the Project's construction phase. However, with implementation of the Construction Traffic Management Plan prepared pursuant Project Design Feature TR-PDF-1, emergency access would not be impeded. The Project's Construction Management Plan would require review and approval from LADOT prior to the start of construction to ensure that adequate and safe access will remain available within and near the Project Site during construction activities. In addition, the Project would ensure that travel lanes would continue to be maintained in each direction throughout the construction period, and the scheduling of haul truck and construction worker trips outside weekday peak traffic periods to the extent feasible would lessen any potential impact. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way, as well as on the City-designated disaster route along Alameda Street. As such, construction-related impacts associated with emergency access would be less than significant. Therefore, impacts to emergency access, including emergency routes, during construction of the Project would be less than significant.

(ii) Operation

With regard to operation, the Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction Projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. Upon completion of the Project and prior to the issuance of a certificate of occupancy, the Applicant would also submit a diagram of the Project Site to the LAPD's Newton Area

¹¹⁴ Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.

Commanding Officer that includes access routes and any additional information that might facilitate police response, as provided in Project Design Feature POL-PDF-6. Furthermore, pursuant to California Vehicle Code (CVC) Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding area would be maintained and the Project would not result in inadequate emergency access during operation of the Project.

Based on the above, impacts regarding adequate emergency access would be less than significant.

(13) Tribal Cultural Resources

A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (PRC Section 21084.2.). AB 52 requires a tribal cultural resource to have tangible, geographically defined properties that can be impacted by an undertaking. No prehistoric sites or resources documented to be of specific Native American origin have been previously recorded on the Project Site or within 0.5 mile of the Project Site. However, as noted above, on April 30, 2020, the Gabrieleño Band of Mission Indians—Kizh Nation provided the City with screen shots of four historic map images along with a review of each map and screen shots of four pages of text from unknown literary sources. In addition, the tribe provided a record of communication with the NAHC, the SCCIC, and Dr. Garey E. Stickel, an archaeologist from Environmental Research Archaeologists: a Scientific Consortium (ERA).

The materials provided by the Gabrieleño Band of Mission Indians—Kizh Nation are evaluated in detail in Table 3 of the TCR Report. The materials show the Project Site's location in relation to historic railroads, which the tribe contends were often placed on top of its traditional trade routes, as well as the hydrology and waterways around the Project Site. Other documents provided by the Tribe during consultation include a section of a SCCIC letter indicating that not all cultural resources are documented within the SCCIC records provided. This is a general note that is included in all records search results performed by the SCCIC, and is not a specific reference to the sensitivity of the present Project Site. A letter drafted to Chairman Salas from Dr. Garey E. Stickel was also provided. In this letter Dr. Stickel expresses the opinion that all projects be subject to cultural monitoring. No specific project is referenced in this letter. This approach is not consistent with standard archaeological practice, which requires management strategies to be developed on a project-by-project basis based in evidence of potential to encounter resources that may be impacted. Here, as stated below, the finding is that there are no significant tribal cultural resources on site so no mitigation is required.

The results of the records searches (i.e., SCCIC and NAHC) conducted for the Project Site and the independent analysis of correspondence and materials relative to potential tribal cultural resources on the Project Site (included in the TCR Report) demonstrate that there is no record or evidence of tribal cultural resources on the Project Site or in its vicinity. In addition, while the information and materials received from the Gabrieleño Band of Mission Indians—Kizh Nation provide evidence of the village of Yanga approximately 1.2 miles northeast of the Project Site, no known geographically-defined resources were identified within, or in the 0.5-mile search radius. Government-to-government consultation initiated by the City, acting in good faith and after a reasonable effort, has not resulted in the identification of a TCR within or near the Project Site. Therefore, the TCR Report concluded there are no tribal cultural resources that are listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources on or within 0.5 mile of the Project Site. **Based on this information, the City, in its discretion and supported by substantial evidence, finds that the Project Site does not contain any resources determined by the City to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. Accordingly, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource with cultural value to a California Native American tribe. As such, impacts related to tribal cultural resources would be less than significant.**

Nonetheless, the City has established a standard condition of approval to address inadvertent discovery of tribal cultural resources. Should tribal cultural resources be inadvertently encountered, this condition of approval provides for temporarily halting construction activities near the encounter and notifying the City and Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project. If the City determines that the object or artifact appears to be a tribal cultural resource, the City would provide any affected tribe a reasonable period of time to conduct a site visit and make recommendations regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources. The Applicant would then implement the tribe's recommendations if a qualified archaeologist reasonably concludes that the tribe's recommendations are reasonable and feasible. The recommendations would then be incorporated into a tribal cultural resource monitoring plan and once the plan is approved by the City, ground disturbance activities could resume. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements.

(14) Utilities and Service Systems—Water Supply and Infrastructure

(a) *Water Infrastructure*

(i) *Construction*

As discussed in the Utility Report included as Appendix E of this Draft EIR and as summarized below, the Project Site currently does not have adequate fire flow available to demonstrate compliance with LAMC standards. In order to provide for the necessary water demands, the Project would require construction of new public water mains within the public right-of-way. This work would include replacing the existing 6-inch mains in both 7th Place and Violet Street and may require supplementary water main construction in Santa Fe Avenue. Construction impacts associated with the installation of water mains would primarily involve trenching in order to place these lines. During the permit phase, LADWP would confirm precise water system upgrades within the affected streets. The Project would secure permits from the Department of Public Works and comply with all standard City requirements during construction.

The Project would also require construction of new, on-site water distribution lines to serve the new buildings included in the proposed Project. The design and installation of new service connections would be required to meet applicable City standards. Installation of the new water distribution lines would primarily involve on-site trenching to place the lines below the surface and minor off-site trenching to connect to the existing public water mains or meter lateral locations. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depths of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service.

The limited off-site connection activities could also temporarily affect access in adjacent rights-of-way. However, as discussed Section IV.I, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be included to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Construction Traffic Management Plan would identify the location of any temporary street parking or sidewalk closures, warning signs, and access to abutting properties. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way.

Overall, construction activities associated with the Project would not require or result in the relocation or construction of new or expanded water facilities, including infrastructure, the construction or relocation of which could cause significant environmental effects. **As such, construction-related impacts related to water infrastructure would be less than significant.**

(ii) Operation

Water service to the Project Site would continue to be supplied by LADWP for domestic and fire protection uses. While domestic water demand is typically the main contributor to operational water consumption, fire flow demands have a much greater instantaneous impact on infrastructure and, therefore, are the primary means for analyzing infrastructure capacity.¹¹⁵ Nevertheless, conservative analyses for both fire suppression and domestic water flows have been completed by LADWP for the Project. These analyses are summarized below and described in more detail in the Utility Report included as Appendix E of this Draft EIR.

Fire flow to the proposed buildings of the Project would be required to meet City fire flow requirements. Specifically, the Project would comply with LAMC Section 57.507.3.1, which establishes fire flow standards by development type. The Project falls within the Industrial and Commercial category, which has a required fire flow of 6,000 to 9,000 gpm from four adjacent hydrants flowing simultaneously with a residual pressure of 20 psi. This translates to a required flow of 1,500 gpm for each hydrant. As noted above, as part of the Utility Report included in Appendix E of this Draft EIR, an IFFAR was submitted to LADWP to determine available fire hydrant flow from six existing public fire hydrants. Based on the completed IFFAR (see Exhibit 1 of Appendix E of this Draft EIR), the six existing public fire hydrants flowing simultaneously can deliver combined flows of 7,000 gpm. Therefore, based on the IFFAR, the Project Site currently does not have adequate fire flow available to demonstrate compliance with the standards specified in LAMC Section 57.507.3.1. However, as discussed above, the Project would include necessary upgrades to improve the adjacent water mains that would facilitate the necessary flow and pressure requirements. Furthermore, LAMC Section 57.507.3.1 states that the installation of supplemental equipment or systems can be substituted in lieu of required fire flow standards. As such, in accordance with LAFD Regulation No. 10 Option 2, the Project would incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands, which will be subject to LAFD review and approval during the design and permitting of the Project. In addition, based on the results of the Service Advisor Request (SAR) performed as part of the Utility Report, LADWP has outlined potential improvements to the water supply infrastructure. As any improvements would be completed to ensure that the system will be able to provide the necessary flow and pressure, and through compliance with LAFD and LADWP requirements, the Project's fire flow impacts to water infrastructure would be less than significant.

¹¹⁵ *Utility Infrastructure Technical Report: Water, Wastewater, and Energy, KPFF Consulting Engineers, February 27, 2018, p. 21 (included as Appendix E of this Draft EIR).*

With respect to the distribution infrastructure, as discussed in greater detail below and stated in the WSA, LADWP concluded that the projected water supplies for normal, single-dry, and multiple-dry years reported in LADWP's 2015 UWMP would be sufficient to meet the Project's estimated water demand, in addition to the existing and planned future water demands within LADWP's service area through the year 2040. The distribution infrastructure in the service area can, therefore, be assumed to be adequate to meet the Project's demand. However, to ensure its infrastructure is sufficient to meet ongoing demand, LADWP will continue to implement its \$6.3 billion five-year water system capital improvement plan, which includes replacement of distribution mainlines, trunk lines, large valves, and water meters, as well as ongoing maintenance and rehabilitation of facilities such as pump stations, pressure regulators, and in-city reservoirs and tanks.¹¹⁶

Based on the above, upon completion of the necessary upgrades to improve the surrounding adjacent water mains, the Project would not exceed the available capacity of existing water facilities, including the distribution infrastructure, that would serve the Project Site. Accordingly, the Project would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, the Project's operational impacts would be less than significant.

(b) Water Supply

(i) Construction

Construction activities for the Project would result in a temporary demand for water associated with soil compaction and earthwork, dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. These activities would occur incrementally throughout construction of the Project (from the start of construction to project buildout). The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. However, given the temporary nature of construction activities, the short-term and intermittent water use during construction of the Project would be less than the net new water consumption of the Project at buildout. As described on page 19 of the Utility Report included as Appendix E of this Draft EIR, based on a review of construction projects that are similar in size and duration to that of the Project, a conservative estimate of construction water use ranges from 1,000 to 2,000 gpd. This would be less than the estimated existing water consumption of the existing uses to be removed of 2,382 gpd. Furthermore, as concluded in LADWP's 2015 UWMP, projected water demand for the City

¹¹⁶ LADWP, 2017–18 Water Infrastructure Plan, revised June 2018.

would be met by the available supplies during an average year, single-dry year, and multiple-dry year in each year from 2015 through 2040. If approved, Project construction is anticipated to be completed by 2024. Therefore, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of Project construction. As such, construction-related impacts to water supply would be less than significant.

Based on the above, LADWP would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, single-dry, and multiple-dry years. Therefore, the Project's construction-related impacts on water supply would be less than significant.

(ii) Operation

As described in Section II, Project Description, of this Draft EIR, the Project would include approximately 569,448 square feet of floor area including up to 347 new live-work units, approximately 187,374 square feet of new office space, 21,858 square feet of new retail/restaurant floor area, and a 926 square-foot community room that residents could use for art creation. In addition, five existing buildings within the northern portion of the Project Site that comprise approximately 56,686 square feet would be retained. The existing uses to be retained would be retrofitted with the same water conservation measures as the new buildings, although this water savings is not included in the calculations below to present a conservative estimate of water demand. Development of the Project would result in an increase in long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is based on a calculation of the Project's water demand by applying the sewage generation rates established by LASAN, which also serve to estimate water demand, to the proposed uses.

Based on the proposed land uses and the Project's resulting estimated water demand, the Project is subject to the requirements of SB 610 (preparation of a WSA, as described above in Section 1.a.(1)c)). Specifically, the Project is anticipated to demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling unit project. Therefore, a WSA was prepared for the Project and is provided in Appendix P of the Draft EIR.

As shown in Table IV.K.1-4 in Section IV.K.1, Utilities and Service Systems—Water Supply, of this Draft EIR, assuming constant water use throughout the year, it is estimated that the Project would result in a net increase in the Project Site's average daily water demand of approximately 109,015 gpd, or approximately 122.13 AFY, including water

savings as required by the LAMC and additional water saving features as set forth in Project Design Feature WAT-PDF-1.¹¹⁷ As stated in the WSA, LADWP concluded that the projected water supplies for normal, single-dry, and multiple-dry years reported in LADWP's 2015 UWMP would be sufficient to meet the Project's estimated water demand, in addition to the existing and planned future water demands within LADWP's service area through the year 2040.

The 2015 UWMP utilized SCAG's 2012–2035 RTP data that provided for more reliable water demand forecasts, taking into account changes in population, housing units and employment. The Project would generate a net of approximately 830 new residents,¹¹⁸ 347 new households, and up to 961 new employees. The Project would be consistent with growth projections anticipated by the SCAG and the demographic projection for the City in both the 2012–2035 RTP/SCS and 2016–2040 RTP/SCS. Specifically, based on SCAG's projections for the City of Los Angeles Subregion between 2018 and 2024 (buildout year), the estimated 830 residents generated by the Project would represent approximately 0.55 percent of the projected population growth, the estimated 347 households would represent approximately 0.44 percent of the projected household growth, and the estimated 961 employees would represent approximately 0.95 percent of the projected employment growth.¹¹⁹ Therefore, the Project would be well within SCAG's projections for the City of Los Angeles Subregion.

¹¹⁷ LASAN wastewater generation rates do not account for water conservation features and therefore, the Project's estimated water demand is conservative. With implementation of Project Design Feature WAT-PDF-1, the Project would incorporate sustainability features such as efficient plumbing features, drought-tolerant landscaping, and modern irrigation, that would reduce the Project's net increase in water demand by at least 20 percent pursuant to the City's Green Building Code.

¹¹⁸ Based on a rate of 2.42 persons per multi-family unit based on the 2017 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.

¹¹⁹ Based on a linear interpolation of SCAG's 2012–2040 data, the 2018 values for population, housing, and employment are calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to each year until 2024.

Population growth between 2018 (4,009,193 persons) and 2024 (4,172,886 persons) is approximately 163,693 persons. The Project's 830 net new residents would represent approximately 0.3 percent of this growth ((830 ÷ 163,693) x 100 = 0.51).

Household growth between 2018 (1,403,671 households) and 2024 (1,481,843 households) is approximately 78,171 households. The Project's 347 net new households would represent approximately 0.26 percent of this growth ((347 ÷ 78,171) x 100 = 0.44).

Employment growth between 2018 (1,797,693 employees) and 2024 (1,898,986 employees) is approximately 101,293 employees. The Project's 961 net new employees would represent approximately 0.69 percent of this growth ((961 ÷ 101,293) x 100 = 0.95).

Based on the above, LADWP determined that the Project's net water demand of 109,015 gpd (approximately 122.13 AFY) has been accounted for in the City's overall total demand projections set forth in its 2015 UWMP. Specifically, the 2015 LADWP UWMP forecasts adequate water supplies to meet all projected water demands in the City through the year 2040 during average years, single-dry years, and multiple-dry years. LADWP, therefore, concluded that the increase in water demand for the Project falls within the available and projected water supplies during an average year, single-dry year, and multiple-dry year through the year 2040, as well as the intervening years (i.e., 2024), as described in its 2015 UWMP. As outlined in its 2015 UWMP, LADWP is committed to providing a reliable water supply for the City. The 2015 LADWP UWMP takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City of Los Angeles will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. The 2015 LADWP UWMP also furthers the goals of the City's ED 5 and Sustainable City pLAN, addresses the current and future SWP supply shortages, and concludes that MWD's actions in response to the threats to the SWP will ensure continued reliability of its water deliveries. By focusing on demand reduction and alternative sources of water supplies, LADWP will further ensure that long-term dependence on MWD supplies will not be exacerbated by potential future shortages. Additionally, water conservation and recycling will play an increasing role in meeting future water demands in the City.

Based on the above, LADWP would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, single-dry, and multiple-dry years. Therefore, the Project's operation-related impacts on water supply would be less than significant.

(15) Utilities and Service Systems—Wastewater

(a) *Wastewater Infrastructure*

(i) *Construction*

The Project would require construction of new on-site infrastructure to serve the new buildings and facilities of the proposed Project. Construction impacts associated with new wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main (no upgrades to the public main are anticipated). However, as set forth in Project Design Feature TR-PDF-1 included in Section IV.I, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts. The Construction Traffic Management Plan would ensure safe pedestrian access and vehicle travel in general, and emergency vehicle access, in particular, throughout the construction period. Overall, when considering

impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration and would cease to occur once the installation is complete. Based on the above, construction activities would not have any adverse impact on wastewater conveyance or treatment infrastructure. In addition, most construction impacts associated with the installation of on-site wastewater facilities and off-site connections are expected to be confined to trenching, would be temporary in nature and would not result in significant environmental effects.

With respect to wastewater generation during construction, construction activities for the Project would not result in wastewater generation as construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system in the Project area. Thus, wastewater generation from Project construction activities is not anticipated to cause a measurable increase in wastewater flows in the Project area. Therefore, Project construction would not substantially or incrementally exceed the future scheduled capacity of any treatment plant by generating flows greater than those anticipated in the IRP.

As such, Project construction would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Project construction impacts to the wastewater conveyance or treatment system would be less than significant.

(ii) Operation

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the HWRP. As described above, the HWRP has a capacity of 450 mgd, and current average wastewater flows are at approximately 275 mgd. Accordingly, the remaining available capacity at the Hyperion Treatment Plant is approximately 175 mgd. As shown in Table IV.K.2-3 in Section IV.K.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project would generate a net increase in wastewater flow from the Project Site of approximately 107,959 gpd, or approximately 0.1 mgd. The Project's increase in average daily wastewater flow of 0.1 mgd would represent approximately 0.06 percent of the current estimated 175 mgd of remaining available capacity at the HWRP. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP, and impacts would be less than significant.

Furthermore, wastewater flows would be typical of residential, office, and commercial developments. No industrial discharge into the wastewater system would occur and as discussed in the Initial Study, included as Appendix A of this Draft EIR, the Project would implement capture and reuse or biofiltration to reduce stormwater pollution

on the Project Site in accordance with the City's Low Impact Development requirements. In accordance with the wastewater reduction requirements for new non-residential and high-rise residential construction set forth in the LAMC (Chapter IX, Article 9, Section 99.05.303.4), the Project would be required to demonstrate a 20-percent reduction in potable water use to comply with the City of Los Angeles Green Building Code. In addition, discharge of effluent from the HWRP into Santa Monica Bay is regulated by permits issued under the NPDES and is required to meet LARWQCB requirements. As LASAN monitors the treated wastewater, wastewater generated from the Project Site would not exceed wastewater treatment requirements of LARWQCB.

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., will ultimately determine the available capacity of the Hyperion Service Area in 2024, the year by which construction of the Project is expected to be completed. Future iterations of the Integrated Resources Plan, such as the One Water LA 2040 Plan discussed above, would provide for improvements beyond 2020 through 2040 to serve future population needs. It is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2024. Thus, based on this conservative assumption, the 2024 effective capacity of the Hyperion Sanitary Sewer System would continue to be approximately 550 mgd. Similarly, the capacity of the HWRP in 2024 would continue to be 450 mgd.

Based on LASAN's average flow projections for the HWRP, it is anticipated that average flows in 2024 would be approximately 322.07 mgd.¹²⁰ Accordingly, the future remaining available capacity in 2024 would be approximately 127.93 mgd. The Project's increase in average daily wastewater flow of 0.1 mgd would represent approximately 0.08 percent of the estimated future remaining available capacity of 127.93 mgd at the HWRP. Therefore, during operation, the Project-generated wastewater would be accommodated by the future capacity of the HWRP, and impacts would be less than significant.

Even with the conservative assumption that no new improvements to the wastewater treatment plants would occur prior to 2024, the proposed Project's net increase in average daily wastewater generation of 0.1 mgd would represent approximately 0.02 percent of the HWRP's design capacity of 450 mgd. The Project's net increase in average daily wastewater generation of 0.1 mgd plus the current average flows of approximately 275 mgd to the HWRP would represent approximately 61.1 percent of the HWRP's

¹²⁰ *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, Exhibit 4D, City of Los Angeles Wastewater Treatment Plants Average Dry-Weather Flows, Reuse and Discharge Method. For FY 2024/2025, average flows to the HWRP are projected to be approximately 361,000 acre feet per year or 322.07 mgd.*

assumed future capacity of 450 mgd. With regard to future flows, the Project's net increase of 0.1 mgd plus the projected flows of approximately 322.07 mgd to the HWRP would represent approximately 71.6 percent of the HWRP's assumed future capacity of 450 mgd.

In addition, the proposed Project's net increase in average daily wastewater generation of 0.1 mgd would represent approximately 0.013 percent of the Hyperion Sanitary Sewer System's assumed future capacity of 550 mgd. The proposed Project's net increase in average daily wastewater generation of 0.1 mgd plus the current flows of approximately 300 mgd to the Hyperion Sanitary Sewer System would represent approximately 54.6 percent of the Hyperion Service Area's assumed future capacity of 550 mgd. With regard to future flows, the proposed Project's net increase in average daily wastewater generation of 0.1 mgd plus the future flows of approximately 406.82 mgd¹²¹ to the Hyperion Sanitary Sewer System would represent approximately 74 percent of the Hyperion Sanitary Sewer System's assumed future capacity of 550 million gallons per day.

Furthermore, sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. As discussed above, there is an existing 8-inch sewer line in 7th Place that would connect to a network of sewer lines and ultimately convey wastewater to the HWRP. This sewer line has a capacity of 0.71 cfs or 458,595 gpd. The Project's net increase in wastewater generation is approximately 107,959 gpd. This represents approximately 24 percent of the line's capacity. As required by LAMC Section 64.15, the Project would submit a Sewer Capacity Availability Request to LASAN to evaluate the capability of the existing wastewater system and obtain approval to discharge the Project's wastewater to the existing 8-inch sewer line in 7th Place. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

As such, based on the above, operation of the Project would not require or result in the construction of new wastewater treatment facilities or expansion of

¹²¹ *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, Exhibit 4D, City of Los Angeles Wastewater Treatment Plants Average Dry-Weather Flows, Reuse and Discharge Method. For FY 2024/2025, average flows to the Hyperion Sanitary Sewer System (comprised of the HWRP, the Donald C. Tillman Water Reclamation Plant, and the Los Angeles-Glendale Water Reclamation Plant) are projected to be approximately 456,000 acre feet per year or 406.82 mgd.*

existing facilities, the construction of which would cause significant environmental effects. Therefore, impacts would be less than significant, and mitigation measures are not required.

(b) Wastewater Treatment Capacity

As discussed above, based on the temporary nature of construction of new on-site infrastructure and minor off-site work associated with connections to the public main line, as well as operational wastewater generation, the Project would not constrain existing and future scheduled wastewater treatment and infrastructure capacity. In addition, the Project would obtain approval from LASAN to discharge the Project's wastewater flows to the existing sewer line in 7th Place and comply with relevant design requirements, as well as applicable sanitation and plumbing standards. Furthermore, the Project's net increase in average daily wastewater generation of 0.1 mgd would represent approximately 0.013 percent of the Hyperion Sanitary Sewer System's assumed future capacity of 550 mgd. Therefore, there is adequate treatment capacity to serve the Project's projected demand in addition to existing LASAN commitments. **As such, the Project would result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments, and impacts would be less than significant.**

(16) Utilities and Service Systems—Energy Infrastructure

(a) Construction

(i) Electricity

Construction activities at the Project Site would require minor quantities of electricity for lighting, power tools, and other support equipment. Heavy construction equipment would be powered with diesel fuel. During Project construction activities, electricity usage from water conveyance and on-site support equipment represents 1 percent of the estimated net annual Project operational demand, which as described below, LADWP's existing electrical infrastructure currently has enough capacity to provide service for.¹²² Moreover, construction electricity usage would replace the electricity usage of existing uses to be removed prior to construction activities. As existing power lines are located in the vicinity of the Project Site, temporary power poles may be installed to provide electricity during Project construction. Existing off-site infrastructure would not have to be expanded

¹²² The percentage is derived by taking the total amount of electricity usage during construction (64,697 kWh) and dividing that number by the total amount of net electricity usage during operation (5,996 MWh) to arrive at 1 percent.

or newly developed to provide electricity to the Project Site during construction or demolition.

With regard to existing electrical distribution lines, the Applicant would be required to coordinate electrical infrastructure removals or relocations with LADWP and comply with site-specific requirements set forth by LADWP, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within LADWP easements are minimized. As such, construction of the Project is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

Therefore, based on the above, construction of the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

(ii) Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction, and there would be no demand generated by construction activities. Since the Project Site is located in an area already served by existing natural gas infrastructure, it is anticipated that the Project would not require extensive off-site infrastructure improvements to serve the Project Site. Construction impacts associated with the installation of natural gas connections are expected to be confined to trenching in order to place the lines below surface. In addition, prior to ground disturbance, Project contractors would notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. **Therefore, construction of the Project would not result in an increase in demand for natural gas impacting available supply or distribution infrastructure capabilities and would not result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.**

(b) Operation

(i) Electricity

As shown in Table IV.C.2 in Section IV.C, Energy, of this Draft EIR, the Project's net operational electricity usage would be 5,996 MWh per year, which would represent less than 0.03 percent of LADWP's projected sales in 2024.¹²³ In addition, during peak conditions, the Project would represent approximately 0.021 percent of the LADWP estimated peak load. LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area.¹²⁴ **Therefore, during Project operations, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand.**

(ii) Natural Gas

As shown in Table IV.C.2 in Section IV.C, Energy, of this Draft EIR, the Project would result in a net increase in the on-site demand for natural gas totaling approximately 9,294,200 cf per year, which translates to 25,464 cf per day and represents approximately 0.001 percent of the 2024 forecasted consumption in the SoCalGas planning area. SoCalGas has confirmed that the Project's natural gas demand can be served by the facilities in the Project area.¹²⁵ **Therefore, it is anticipated that SoCalGas' existing and planned natural gas supplies would be sufficient to support the Project's net increase in demand for natural gas.**

(c) Conclusion

As demonstrated in the analysis above, construction and operation of the Project would not result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects would be less than significant during construction and operation.

¹²³ LADWP, 2017 Power Strategic Long-Term Resources Plan, Appendix A.

¹²⁴ KPFF Consulting Engineers, Utility Technical Report: Water, Wastewater, and Energy, February 27, 2018. Refer to Appendix E of this Draft EIR.

¹²⁵ KPFF Consulting Engineers, Utility Technical Report: Water, Wastewater, and Energy, February 27, 2018. Refer to Appendix E of this Draft EIR.

b. Less Than Significant with Mitigation

(1) Cultural Resources—Archaeological Resources

The results of the archaeological records search indicate that while there are four historic-era archaeological sites located within a 0.5-mile radius of the Project Site, there are no identified archaeological sites within the Project Site.

With respect to the Zanja Madre, one segment of the zanja network, Zanja No. 1, has been represented on historical maps west of the Project Site and a thorough review of historic sources, including historical documents, academic research, maps, and aerials have not shown Zanja No. 1 to be located within or directly adjacent the Project Site. Furthermore, the Project Site was extensively developed by the early 1950s and has been substantially disturbed as a result. Considering these factors, the potential for buried prehistoric-era and historic-era archaeological deposits to exist within the Project site is considered to be relatively low. Nonetheless, the Project would involve excavation of the Project Site to a maximum depth of approximately 77 feet below grade, and portions of the Zanja Madre or previously unknown archaeological resources could be encountered. As set forth in Mitigation Measure CUL-MM-1, a qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site. In the event archaeological materials are encountered, the archaeologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The implementation of Mitigation Measure CUL-MM-1 would ensure that any potential impacts related to archaeological resources would be less than significant. **Therefore, with implementation of Mitigation Measure CUL-MM-1, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5, and, as such, any potential impacts related to archaeological resources would be less than significant.**

(2) Geology and Soils—Paleontological Resources

The Project Site and surrounding area are fully developed and generally characterized by flat topography or vicinity. There are no unique geologic features on the Project Site. Therefore, the Project would not destroy any distinct and prominent geologic or topographic features. In addition, according to the paleontological records search conducted for the Project Site, there are no previously encountered fossil vertebrate localities located within the Project Site. The closest identified localities on the Project Site were identified approximately 2 miles west-northwest of the Project Site and were collected at depths between 20 and 43 feet below the surface area. The paleontological records search indicates that shallow excavations in the younger Quaternary Alluvium exposed throughout the Project Site are unlikely to uncover significant vertebrate fossils. However,

deeper excavations into the older Quaternary deposits have the potential to encounter significant fossil vertebrates. The Project would require maximum excavation depths of approximately 77 feet. Thus, the possibility exists that paleontological artifacts that were not discovered during prior construction or other human activity may be present. As set forth in Mitigation Measure GEO-MM-1, below, a qualified paleontologist would be retained to perform periodic inspections of excavation and grading activities of the Project Site. In the event paleontological materials are encountered, the paleontologist would temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. **Therefore, with implementation of Mitigation Measure GEO-MM-1, the Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature and impacts would be less than significant.**

(3) Noise—On-Site Vibration (Building Damage)

With regard to potential building damage, the Project would generate ground-borne construction vibration during building demolition and site excavation/grading activities when heavy construction equipment, such as large bulldozers, drill rigs, and loaded trucks, would be used. The FTA has published standard vibration velocities for various construction equipment operations. Table IV.G-22 in Section IV.G, Noise, of this Draft EIR, provides the estimated vibration levels (in terms of inch per second PPV) at the nearest off-site structures to the Project Site. It is noted that since impact pile driving methods would not be used during construction of the Project, in accordance with Project Design Feature NOI-PDF-5 provided above, impact pile driving vibration is not included in the on-site construction vibration analysis. Installation of piles for shoring and foundation would utilize drilling methods to minimize vibration generation.

As discussed in Section IV.C, Cultural Resources, of the Draft EIR, there are four historical resources in the vicinity of the Project Site, including the Engine Company No. 17 building located at 710 Santa Fe Avenue (225 feet north of the Project Site), the Ford Motor Company Factory building located at 2046–2060 7th Street and 715–821 Santa Fe Avenue (220 feet west of the Project Site), the building located at 2035 Bay Street (450 feet southwest of the Project Site), and on-site Building C (located at 2140 7th Place). The off-site historical resources are located at sufficient distance from the Project Site and would not be exposed to the Project on-site construction activities. The assessment of construction vibration provided in Table IV.G-22 for potential building damage due to on-site construction compares the estimated vibration levels generated during construction of the Project to the 0.12-PPV significance criteria for the historic structures, 0.3-PPV significance criteria for an engineered concrete and masonry building (applicable to the single- and two-story buildings to the north, south and west of the Project Site). In addition, the construction vibration analysis for potential building damage due to off-site construction activities (i.e., haul trips) conservatively compares the estimated vibration levels generated

from haul truck activities to the 0.12-PPV significance criteria for buildings extremely susceptible to vibration damage.

As indicated in Table IV.G-22, the estimated vibration velocity levels from construction equipment would be below the building damage threshold of significance for the existing off-site building structures north, south, and west of the Project Site. In addition, the estimated vibration levels from the construction equipment would be well below the 0.12 PPV building damage threshold of significance for the off-site historic buildings. However, the estimated vibration levels would exceed the building damage threshold of significance at on-site Building C. **Therefore, vibration impacts during construction of the Project to off-site and on-site building structures would be significant. However, with implementation of Mitigation Measure NOI-MM-2, impacts to the on-site historic building would be reduced to less than significant levels. Impacts to the off-site historic structures would continue to be less than significant without mitigation.**

c. Significant and Unavoidable

(1) Noise

(a) Project-Level On-Site Construction Noise

Noise impacts from Project-related construction activities occurring within or adjacent to the Project Site would be a function of the noise generated by construction equipment, the location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance to noise-sensitive receptors. Construction activities for the Project would generally include demolition, site grading and excavation for the subterranean parking garage, and building construction. Each stage of construction would involve the use of various types of construction equipment and would, therefore, have its own distinct noise characteristics. Demolition generally involves the use of backhoes, front-end loaders, and heavy-duty trucks. Grading and excavation typically requires the use of earth-moving equipment, such as excavators, front-end loaders, and heavy-duty trucks. Building construction typically involves the use of cranes, forklifts, concrete trucks, pumps, and delivery trucks. Noise from construction equipment would generate both steady-state and episodic noise that could be heard within and adjacent to the Project Site.

Individual pieces of construction equipment anticipated to be used during construction of the Project could produce maximum noise levels (L_{max}) of 74 dBA to 90 dBA at a reference distance of 50 feet from the noise source, as shown in Table IV.G-11 in Section IV.G, Noise, of this Draft EIR. These maximum noise levels would occur when equipment is operating under full power conditions (i.e., the equipment engine at maximum

speed). However, equipment used on construction sites often operate under less than full power conditions, or part power. To more accurately characterize construction-period noise levels, the average (hourly L_{eq}) noise level associated with each construction phase is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction phase.¹²⁶ These noise levels are typically associated with multiple pieces of equipment operating on part power, simultaneously.

Table IV.G-12 in Section IV.G, Noise, of this Draft EIR provides the estimated construction noise levels for various construction phases at the off-site noise-sensitive receptors. To present a conservative impact analysis, the estimated noise levels were calculated for a scenario in which all pieces of construction equipment were assumed to operate simultaneously and be located at the construction area nearest to the affected receptors. These assumptions represent the worst-case noise scenario because construction activities would typically be spread out throughout the Project Site, and, thus, some equipment would be farther away from the affected receptors. In addition, the noise modeling assumes that construction noise is constant, when, in fact, construction activities and associated noise levels are periodic and fluctuate based on the construction activities.

As discussed above, since construction activities would occur over a period longer than 10 days for all phases, the corresponding thresholds of significance used in the construction noise analysis are when the construction-related noise exceeds the ambient L_{eq} noise levels by 5 dBA at a noise-sensitive use. As presented in Table IV.g-12, construction activities would generate the highest noise during the demolition phase at receptors R1, R2, and R3, as it is anticipated to have the highest noise generating construction equipment in the construction area compared to the Project's other construction stages. Construction activities at receptor R4 would be the highest during the building construction phase, as this phase has the highest number of construction equipment. Therefore, the potential noise impacts (i.e., noise increase over the ambient level) would be highest during the building demolition phase at receptors R1, R2, and R3 and during the building construction phase at receptor R4. As indicated in Table IV.G-12, the estimated noise levels during all stages of Project construction would be below the 5-dBA threshold of significance at all off-site receptor locations, with the exception of receptor location R1. Noise levels at Receptor R3 would not exceed the threshold because the existing on-site three-story building at the northwest corner of the Project Site provides noise attenuation from on-site construction activities. The estimated construction-related noise at receptor location R1 would exceed the significance threshold during all phases of construction. These exceedances would range from 18.2 dBA during the mat foundation

¹²⁶ Pursuant to the FHWA Roadway Construction Noise Model User's Guide, 2006, the usage factor is the percentage of time during a construction noise operation that a piece of construction is operating at full power.

phase (creation of a thick reinforced concrete slab) to up to 24.3 dBA during the building demolition phase without implementation of mitigation. Therefore, temporary noise impacts associated with the Project's on-site construction would be significant.

Implementation of Mitigation Measure NOI-MM-1 would reduce the Project's construction noise levels to the extent feasible. Specifically, implementation of Mitigation Measure NOI-MM-1 (installation of a temporary sound barrier) would reduce the noise generated by on-site construction activities by a minimum 15 dBA at the residential use on 7th Place north of the Project Site (receptor location R1). However, the construction-related noise at receptor location R1 would still exceed the significance threshold by 3.2 to up to 9.3 dBA during all of the construction phases. The noise impacts at location R1 would be temporary when construction equipment is operating at the northern portion of the Project Site with direct line-of-sight to the receptor location R1. However, there are no other feasible mitigation measures to further reduce the construction noise at location R1 to below the significance threshold. **Therefore, construction noise impacts associated with on-site noise sources would remain significant and unavoidable.**

(b) Project-Level On-Site Construction Vibration (Human Annoyance)

Table IV.G-23 in Section IV.G, Noise, of this Draft EIR, provides the estimated vibration levels at the off-site sensitive uses due to construction equipment operation and compares the estimated vibration levels to the specified thresholds of significance for human annoyance. Per FTA guidance, the thresholds of significance for human annoyance is 72 VdB for sensitive uses, including residential and hotel, and 65 VdB for studio (recording/broadcast) uses, assuming there are a minimum of 70 vibration events occurring during a typical construction day. As indicated in Table IV.G-23, the estimated ground-borne vibration levels from construction equipment would be below the significance criteria for human annoyance at off-site sensitive receptor locations R2 and R4. The estimated ground-borne vibration levels would be up to 78 VdB at receptor location R1 and up to 69 VdB at receptor location R3, which would exceed the 72 VdB and 65 VdB significance criteria, respectively. The vibration exceedance would occur during the demolition and grading/excavation phases with large construction equipment (i.e., large bulldozer, caisson drilling and loaded trucks) operating within 80 feet of the receptor location R1 and within 140 feet of receptor location R3. Vibration from impacts would be below the significance criteria after the foundation phase. Therefore, on-site vibration impacts during construction of the Project, pursuant to the significance criteria for human annoyance, would be significant.

Mitigation measures considered to reduce vibration impacts from on-site construction activities with respect to human annoyance included the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must

be very deep and long to be effective.¹²⁷ In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment, and could potentially result in traffic disruptions or be infeasible due to soil conditions. Thus, it is concluded that there are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts from on-site construction (during site demolition, grading/excavation, and foundation phases) associated with human annoyance to a less-than-significant level. **Therefore, project-level vibration impacts from on-site construction activities with respect to human annoyance would remain significant and unavoidable.**

(c) *Cumulative On-Site Construction Noise*

As indicated in Section III, Environmental Setting, of this Draft EIR, 74 related projects have been identified in the vicinity of the Project Site. Noise from construction of development projects is typically localized and has the potential to affect noise-sensitive uses within 500 feet from the construction site, based on the *L.A. CEQA Thresholds Guide* screening criteria. Thus, noise from construction activities for two projects within 1,000 feet of each other can contribute to a cumulative noise impact for receptors located midway between the two construction sites. While the majority of the related projects are located a substantial distance (greater than 1,000 feet) from the Project Site, the following 12 related projects are within 1,000 feet of the Project Site:

- Related Project No. 8 is a mixed-use development located at 2051 7th Street, approximately 560 feet northwest of the Project Site. However, the Related Project No. 8 is currently under construction and is anticipated to be completed prior to the start of the Project construction. Therefore, Related Project No. 8 would not contribute to cumulative construction-related noise impacts.
- Related Project No. 10 is a mixed-use development located at 826 Mateo Street, approximately 710 feet west of the Project Site. There are noise sensitive receptors located along Santa Fe Avenue between Related Project No. 10 and the Project Site. However, there are intervening buildings between the Related Project No. 10 and the Project Site, which would provide adequate noise reduction from the construction activities between the two projects. Therefore, the Project would not contribute to cumulative construction-related noise impacts in the event of concurrent construction with Related Project No. 10.
- Related Project No. 11 is an office/retail development located at 2030 7th Street, approximately 230 feet west of the Project Site. However, construction for this related project is completed. Therefore, the Related Project No. 11 would not contribute to cumulative construction-related noise impacts.

¹²⁷ Caltrans, *Transportation- and Construction-Induced Vibration Guidance Manual*, June 2004.

- Related Project No. 18 is an office/retail development located at 2130 Violet Street, approximately 60 feet south of the Project Site. The nearest noise sensitive receptor to the Project Site and the Related Project No. 18 is the multi-family residential use on 7th Place (receptor location R1). As analyzed above, the estimated Project-related construction noise levels at receptor R1 would be up to 24.3 dBA above the threshold of significance and would be significant during all phases of construction. Therefore, the Project could contribute to cumulative construction-related noise impacts at receptor location R1 in the event of concurrent construction with Related Project No. 18.
- Related Project No. 25 is a private club (SOHO House) development located at 1000 Santa Fe Avenue, approximately 410 feet southwest of the Project Site. The Related Project No. 25 is represented by receptor location R4. The Related Project No. 25 is nearly complete and will be operational prior to the start of the Project construction. Therefore, the Related Project No. 25 would not contribute to cumulative construction-related noise impacts
- Related Project No. 26 is a mixed-use development located at 2110 Bay Street, approximately 410 feet south of the Project Site. The nearest noise sensitive receptor to Related Project No. 26 and the Project Site is the future SOHO House (construction nearly completed and will be operational prior to Project construction), represented by receptor location R4. Receptor location R4 is adjacent to the Related Project No. 26 Site and would be exposed to Related Project No. 26 construction-related noise level of 76.7 dBA (excavator operating at 50 feet), which would exceed the 5 dBA above ambient significance criteria.¹²⁸ However, as analyzed above, the estimated Project-related construction noise levels at receptor location R4 would be up to 54.0 dBA, which would be well below the noise from the Related Project No. 26 and a minimum 11.2 dBA below the significance criteria. Per Caltrans, when two noise levels are 10 dB or more apart, the lower value does not contribute significantly (less than 0.5 dB) to the total noise level.¹²⁹ Thus, the Project would not result in a significant contribution (i.e., measurable increase) to the cumulative construction noise. Therefore, the Project would not contribute to cumulative construction-related noise impacts in the event of concurrent construction with Related Project No. 26.
- Related Project No. 32 is a mixed-use development located at 676 Mateo Street, approximately 990 feet northwest of the Project Site. There are multiple buildings between Related Project No. 32 and the Project Site, which would provide adequate noise reduction from the construction activities between the two projects. Therefore, the Project would not contribute to cumulative construction-related noise impacts in the event of concurrent construction with Related Project No. 32.

¹²⁸ City of Los Angeles, *2110 Bay Street Mixed-Use Project Draft EIR, Section IV.H Noise, November 2018.*

¹²⁹ Caltrans, *Technical Noise Supplement, 2009, Chapter 2.1.3.5.*

- Related Project No. 37 is a mixed-use development located at 670 Mesquit Street, approximately 435 feet north of the Project Site. There are noise sensitive receptors located between Related Project No. 37 and the Project Site, including the multi-family residential use on 7th Place, represented by receptor location R1. As analyzed above, the estimated Project-related construction noise levels at receptor R1 would be up to 24.3 dBA above the threshold of significance during all phases of construction. In addition, receptor location R1 is approximately 225 feet from the Related Project No. 37 and would be exposed to the Related Project No. 37 construction noise. Therefore, the Project could contribute to cumulative construction-related noise impacts at receptor location R1 in the event of concurrent construction with Related Project No. 37.
- Related Project No. 44 is a mixed-use development located at 1000 Mateo Street, approximately 835 feet southwest of the Project Site. There are multiple buildings between Related Project No. 44 and the Project Site, which would provide adequate noise reduction from the construction activities between the two projects. Therefore, the Project would not contribute to cumulative construction-related noise impacts in the event of concurrent construction with Related Project No. 44.
- Related Project No. 45 is an office/retail/restaurant development located at 2159 Bay Street, approximately 380 feet southeast of the Project Site. The nearest noise sensitive receptor to the Related Project No. 45 and the Project Site is the future SOHO House (construction nearly complete and will be operational prior to construction of the Project), represented by receptor location R4. Receptor location R4 is located approximately 250 feet west of the Related Project No. 45 Site and would be exposed to the Related Project No. 26 construction-related noise. However, as analyzed above, the estimated Project-related construction noise levels at receptor location R4 would be up to 54 dBA and minimum 11.2 dBA below the significance criteria. As described above, when two noise levels are 10 dB or more apart, the lower value does not contribute significantly (less than 0.5 dB) to the total noise level. Therefore, the Project construction noise contribution would not be cumulatively considerable. Therefore, the Project would not contribute to cumulative construction-related noise impacts in the event of concurrent construction with Related Project No. 45.
- Related Project No. 48 is an industrial park development located at 1005 Mateo Street, approximately 1000 feet southwest of the Project Site. There are multiple buildings between Related Project No. 44 and the Project Site, which would provide adequate noise reduction from the construction activities between the two projects. Therefore, the Project would not contribute to cumulative construction-related noise impacts in the event of concurrent construction with Related Project No. 48.
- Related Project No. 64 is a mixed-use development located at 1024 Mateo Street, approximately 880 feet southwest of the Project Site. There are multiple

buildings between Related Project No. 64 and the Project Site, which would provide adequate noise reduction from the construction activities between the two projects. Therefore, the Project would not contribute to cumulative construction-related noise impacts in the event of concurrent construction with Related Project No. 64.

Construction-related noise levels from the related projects would be intermittent and temporary, and it is anticipated that, as with the Project, the related projects would comply with the construction hours and other relevant provisions set forth in the LAMC. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual related project and compliance with locally adopted and enforced noise ordinances. Based on the above, assuming concurrent construction activities, there would potentially be cumulative noise impacts at the nearby sensitive uses (e.g., residential and hotel uses) located in proximity to the Project Site and Related Project Nos. 18, 26, and 37, in the event of concurrent construction activities. **As such, cumulative on-site noise impacts from on-site construction would be significant.**

(d) Cumulative Off-Site Operational Noise

The Project and related projects in the area would produce traffic volumes (off-site mobile sources) that would generate roadway noise. Cumulative noise impacts due to off-site traffic were analyzed by comparing the projected increase in traffic noise levels from “Baseline” conditions to “Future Plus Project” conditions to the applicable significance criteria. Future Plus Project conditions include traffic volumes from future ambient growth, related projects, and the Project. The calculated traffic noise levels under “Baseline” and “Future Plus Project” conditions are presented in Table IV.G-24 in Section IV.G, Noise, of this Draft EIR. As shown therein, cumulative traffic volumes would result in an increase ranging from 1.7 dBA (CNEL) along the roadway segment of Violet Street (between Mateo Street and Santa Fe Avenue), to 12.1 dBA (CNEL) along the roadway segment of Violet Street (east of Santa Fe Avenue). As there is no noise-sensitive use along the segment of Violet Street (east of Santa Fe Avenue), there is no significant traffic noise impacts along this roadway segment. The estimated traffic noise levels would exceed the 3-dBA threshold of significance (applicable when noise levels fall within the normally unacceptable or clearly unacceptable land use category) along the roadway segments of Mateo Street (between 6th and 7th Streets), and Santa Fe Avenue (between 7th Street and Violet Street). Conventional mitigation measures, such as providing noise barrier walls to reduce the off-site traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the impacted roadway segments. There are no other feasible mitigation measures to reduce the significant noise impacts associated with the cumulative off-site traffic. **Therefore, cumulative noise impacts due to off-site mobile noise sources associated with the Project, future growth, and related projects would be significant.**

(2) Transportation

(a) Vehicle Miles Traveled

The VMT Calculator was used to evaluate Project VMT and compare it to the VMT impact criteria. The VMT Calculator was set up with the Project's four land uses and their respective sizes as the primary input. Based on the Project's proposed land uses and location, the following assumptions were identified in the VMT Calculator:

- Total Population: 782
- Total Employees: 837
- APC: Central
- TBZ: Suburban Center
- Maximum VMT Reduction: 20 percent

Using these assumptions, the Project is estimated to result in 5,318 daily vehicle trips and a total daily VMT of 37,176, resulting in a daily household VMT per capita of 9.3 and a daily work VMT per employee of 9.1, which exceed the thresholds for the Central APC of 6.0 and 7.6, respectively. **Thus, the Project is projected to have a significant impact on both household and work VMT as estimated by the VMT calculator.** Since the restaurant component of the Project is less than 50,000 square feet, it is considered to be a small-scale and local-serving retail use under the TAG screening criteria. The restaurant space is intended to serve primarily Project residents and office workers. Accordingly, per the TAG, VMT impacts from this portion of the Project would be less than significant.¹³⁰

10. Project Design Features

The following project design features are applicable to the Project:

a. Greenhouse Gas Emissions

Project Design Feature GHG-PDF-1: The design of the new buildings shall incorporate the following sustainability features:

¹³⁰ LADOT, *Transportation Assessment Guidelines*, July 2019, p. 16.

- Incorporate energy-saving technologies and components to reduce the Project's electrical use profile. Examples of these components include the use of light-emitting diode (LED) and other efficient lighting technology, energy saving lighting control systems such as light- and motion-detection controls (where applicable), and energy efficient heating, ventilation, and air conditioning (HVAC) equipment.
- HVAC mechanical systems and building lighting shall be controlled with timing systems to prevent accidental or inappropriate conditioning or lighting of unoccupied space.
- Demand control ventilation shall be utilized in HVAC systems, and refrigerants in HVAC equipment shall have low GHG emission rates. In particular, the HVAC system shall be designed to optimize exterior and interior air-flow to ensure healthy indoor air quality.

b. Noise

Project Design Feature NOI-PDF-1: 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). All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated. Compliance with this measure shall be verified by LADBS via field inspection.

Project Design Feature NOI-PDF-2: All outdoor mounted mechanical equipment shall be enclosed or screened from off-site noise-sensitive receptors. The equipment screen shall be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the line-of-sight from the equipment to the off-site noise-sensitive receptors. Documentation shall be submitted at plan check, and shall include documentation prepared by a noise consultant to verify compliance with this measure.

Project Design Feature NOI-PDF-3: Outdoor amplified sound systems, if any, shall be designed so as not to exceed the maximum noise level of 75 dBA (L_{eq-1hr}) at a distance of 15 feet from the amplified speaker sound systems at the Ground Level (pedestrian paseo); 80 dBA (L_{eq-1hr}) at the Level 4 outdoor deck; and 90 dBA at the Level 8 outdoor deck. A qualified noise consultant shall provide written documentation that the design of the system complies with these maximum noise levels.

Project Design Feature NOI-PDF-4: All loading docks adjacent to off-site sensitive receptors shall be designed to be integrated into the building and thus shielded from view by off-site sensitive receptors.

Project Design Feature NOI-PDF-5: Project construction shall not include the use of driven (impact) pile systems.

c. Public Services—Police Protection

Project Design Feature POL-PDF-1: During construction, the Applicant will implement temporary security measures including security fencing, lighting, and locked entry.

Project Design Feature POL-PDF-2: The Project will include a closed circuit camera system and keycard entry for the residential building and the residential parking areas.

Project Design Feature POL-PDF-3: The Project will provide proper lighting of buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings.

Project Design Feature POL-PDF-4: The Project will provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment.

Project Design Feature POL-PDF-5: The Project will design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites.

Project Design Feature POL-PDF-6: Upon completion of construction of the Project and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project Site to the LAPD's Newton Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

d. Transportation

TR-PDF-1: Prior to the start of construction, a Construction Traffic Management Plan shall be prepared and submitted to LADOT for review and approval. The Construction Traffic Management Plan will include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. Furthermore, the Construction Traffic Management Plan and Worksite Traffic Control Plan will include, but not be limited to, the following measures:

- As parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, should be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures;
- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during construction;

- Parking for construction workers will be provided either on-site or at off-site, off-street locations. Parking shall be prohibited on streets in the vicinity of the Project Site; and
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses and residences.

e. Utilities and Service Systems—Water Supply and Infrastructure

Project Design Feature WAT-PDF-1: In addition to regulatory requirements, the Project design shall incorporate the following water conservation features to support water conservation in addition to those measures required by the City's current codes and ordinances:

- High-Efficiency Toilets with a flush volume of 1.0 gallon per flush;
- Showerheads with a flow rate of 1.5 gallons per minute, or less;
- Domestic Water Heating System located in close proximity of point(s) of use;
- Individual metering and billing for water use for commercial space;
- Drip/ Subsurface Irrigation (Micro-Irrigation);
- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together);
- Drought-Tolerant Plants—60 percent of total landscaping; and
- Weather-based irrigation system and water efficient landscaping.

11. Mitigation Measures

The following mitigation measures are applicable to the Project:

a. Cultural Resources—Archeological Resources

Mitigation Measure CUL-MM-1: A qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the archaeologist and the City of Los Angeles Department of City Planning and shall depend on the rate of excavation and grading activities and the materials being excavated. If archaeological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary,

salvage. The archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist.

b. Geology and Soils—Paleontological Resources

Mitigation Measure GEO-MM-1: A qualified paleontologist shall be retained by the Applicant to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities and the materials being excavated. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum and the Department of City Planning. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

c. Noise

Mitigation Measure NOI-MM-1: Prior to the start of construction activities, a temporary and impermeable sound barrier shall be erected along the northern property line of the Project Site between the construction areas and the residential use on the north side of 7th Place. The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at the ground level of receptor R1. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

Mitigation Measure NOI-MM-2: Prior to start of construction, the Applicant shall retain the services of a structural engineer to visit on-site Building C to inspect and document (video and/or photographic) the apparent physical condition of the building. In addition, the structural engineer shall establish baseline structural conditions of the building and prepare a shoring design.

Prior to construction, the Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at on-site Building C during shoring and excavation of the parking garage. The vibration monitoring system shall measure (in vertical and horizontal directions) and continuously store the peak particle velocity (PPV) in inch/second. The system shall also be programmed for two preset velocity levels: a warning level of 0.10 inch/second (PPV) and a regulatory level of 0.12 inch/second (PPV). The system shall also provide real-time alert when the vibration levels exceed the two preset levels.

The vibration monitoring program shall be submitted to the Department of Building and Safety and the Department of City Planning, prior to initiating any construction activities.

In the event the warning level 0.10 inch/second (PPV) is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including but not limited to halting/staggering concurrent activities and utilizing lower vibratory techniques.

In the event the regulatory level 0.12 inch/second (PPV) is triggered, the contractor shall halt the construction activities in the vicinity of the building and visually inspect the building for any damage. Results of the inspection must be logged. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. Construction activities may then restart once the vibration level is re-measured and below the warning level.

In the event damage occurs to historic finish materials at the on-site building C due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant and the City of Los Angeles Office of Historic Resources. If warranted, such repairs shall be conducted in a manner that meets the Secretary of the Interior's Standards.

d. Transportation

Mitigation Measure TR-MM-1: The Project shall prepare a TDM program. TDM program elements could include measures such as unbundled parking although the exact measures will be determined when the plan is prepared. The City of Los Angeles requires that the TDM plan be prepared during construction, with the final TDM plan approved by LADOT prior to the City's issuance of the certificate of occupancy for the Project. Implementation of the TDM plan occurs after building occupancy.

TDM strategies applicable for the residential component:

Unbundled Parking—Unbundling parking typically separates the cost of purchasing or renting parking spaces from the cost of purchasing or renting a dwelling unit. Saving money on a dwelling unit by forgoing a parking space acts as an incentive that minimizes auto ownership. Similarly, paying for parking (by purchasing or leasing a space) acts as a disincentive that discourages auto ownership and trip-making.

TDM strategies applicable for the office component:

Required Commute Trip Reduction Program—This strategy involves the development of an employee-focused travel behavior change program that targets individual attitudes, goals, and travel behaviors, educating participants on the impacts of their travel choices and the opportunities to alter their habits. The program typically includes elements such as a coordinated ride-sharing or carpooling program, vanpool program, alternative work schedule program, preferential carpool parking, guaranteed ride home service, and a program coordinator. The program requires the development of metrics to evaluate success, program monitoring, and regular reporting.

TDM strategies applicable for both the office and residential components:

Promotions and Marketing—This strategy involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices. This strategy includes passive educational and promotional materials, such as posters, info boards, or a website with information that a traveler could choose to read at their own leisure. It can also include more active promotional strategies such as gamification.

12. Summary of Alternatives

This Draft EIR examines four alternatives to the Project in detail, which include the No Project/No Build Alternative; Zoning Compliant All Commercial Alternative; Reduced Density, FAR, and Programming Alternative; and DTLA 2040 Community Plan Update Mixed-Use Alternative. A general description of these alternatives is provided below. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives and a comparative analysis of the impacts of these alternatives relative to those of the Project.

a. Alternative 1: No Project/No Build Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which a

proposed project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states that “in certain instances, the No Project Alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved and no new development would occur within the Project Site. Thus, the physical conditions of the Project Site would generally remain as they are today. Under Alternative 1, the Project Site would continue to be developed with seven buildings that comprise approximately 63,530 square feet of floor area and range in height from one to three stories. These buildings would continue to be used for 6,983 square feet of office uses, 25,739 square feet of retail uses, 2,109 square of warehouse uses, and 10 live-work units comprised of 28,699 square feet. In addition, two sheds and surface parking areas generally located on the southern half of the Project Site would remain. No new construction would occur.

b. Alternative 2: Zoning Compliant All Commercial Alternative

Under this Alternative, the Project Site would be developed with all commercial uses in accordance with the existing M3-1-RIO (Heavy Industrial, Height District 1, River Improvement Overlay) zoning for the Project Site. Height District 1 within the M3 zone imposes no height limitation, but provides for a maximum FAR of 1.5:1. Thus, Alternative 2 would develop approximately 14,253 square feet of ground floor retail and 128,169 square feet of office space, compared to 347 new live-work units, 187,374 square feet of office space, 21,858 square feet of new retail/restaurant floor area, and 926 square feet of artist production amenity space with the Project. The proposed uses would be located in a six-story, 99-foot-tall building, as compared to a 36-story residential tower with a maximum height of 425 feet and an eight-story, 131-foot-tall office building with the Project. Similar to the Project, Alternative 2 would demolish buildings D, E, F, and H on the Project Site, and five existing buildings within the northern portion of the Project Site that comprise approximately 56,686 square feet, as well as their 24 parking spaces, would be retained with office, retail, restaurant, warehouse, and live-work units. The Zoning Compliant All Commercial Alternative would not be required to include open space but would include the same pedestrian paseo connecting the existing and proposed buildings, as well as new landscaped areas. A total of 285 vehicle parking spaces would be provided in three subterranean parking levels, compared to 828 vehicle parking spaces within six subterranean levels with the Project. Alternative 2 would provide 53 bicycle parking spaces with 20 short-term spaces and 33 long-term spaces located within three subterranean levels, compared to 257 bicycle parking spaces in six subterranean levels with the Project. Like the Project, vehicular access would be provided via a driveway located at the southeastern corner of the Project Site along Violet Street. Primary pedestrian access to the proposed building would be from an office lobby located along Violet Street within the northeastern corner of the Project Site and via several entrances along the paseo.

As noted above, Alternative 2 would develop only one building compared to the Project, however the building design would be similar to the office building proposed with the Project, though the height would be reduced. Alternative 2 would also implement similar signage, lighting, vehicular and pedestrian access, setbacks, and sustainability features as those proposed for the Project. Alternative 2 would require fewer discretionary approvals as the Project because no residential uses are proposed. Construction would be generally similar to the Project, but shorter in overall duration due to the reduced amount of development.

c. Alternative 3: Reduced Density, FAR, and Programming Alternative

Alternative 3 would develop the same mix of uses as the Project, but all development would be reduced by approximately 25 percent. Specifically, under this Alternative, the proposed live-work units would be reduced from 347 to 230, the proposed office would be reduced from 187,374 square feet to 140,530 square feet, and the proposed retail/restaurant space would be reduced from 21,858 square feet to 16,394 square feet. Total floor area under Alternative 3 would be reduced from 569,448 square feet to 441,258 square feet, resulting in a FAR of 4.65:1 compared to a 6:1 with the Project. Like the Project, this alternative would develop two new buildings: a 27-story residential tower with a maximum height of 319 feet and a six-story office building with a maximum height of 98 feet. These buildings would be shorter than the 425-foot residential tower and 8-story office building proposed by the Project. Similar to the Project, Alternative 3 would demolish buildings D, E, F, and H on the Project Site and five existing buildings within the northern portion of the Project Site that comprise approximately 56,686 square feet, as well as their 24 parking spaces, would be retained with office, retail, restaurant, warehouse, and live-work units. Alternative 3 would provide approximately 28,350 square feet of open space, which is less than the 71,719 square feet of open space provided by the Project. The open space in Alternative 3 would include the same amenities as the Project. A total of 574 vehicle parking spaces would be provided in five subterranean parking levels, compared to 828 vehicle parking spaces within six levels with the Project. Alternative 3 would provide 203 bicycle parking spaces, consisting of 35 short-term spaces and 168 long-term spaces, compared to 257 bicycle parking spaces with the Project. Vehicular access to the residential subterranean parking would be provided via a driveway accessible through the alleyway on the western side of the Project Site. Residential loading docks and loading area would be located immediately south of the residential parking entrance. Vehicular access to the office subterranean parking would be provided via a driveway located at the southeastern corner of the Project Site along Violet Street. Commercial loading dock and loading areas would be located immediately adjacent to the office parking entrance. Pedestrian access would be provided via a new paseo that connects the existing buildings with the proposed buildings. The entrance to the residential lobby would be located on the eastern side of the residential tower. Primary pedestrian access to the office

component would be from an office lobby located along Violet Street within the northeastern corner of the Project site. Access to the retail/restaurant spaces would be provided via several entrances throughout the paseo.

This alternative would implement a similar building design as the Project, though the heights would be reduced. Alternative 3 would also implement similar signage, lighting, vehicular and pedestrian access, setbacks, and sustainability features as those proposed for the Project. Alternative 3 would require the same discretionary approvals as the Project. Due to the reduced amount of construction, the duration of construction would be less than the Project.

d. Alternative 4: DTLA 2040 Community Plan Update Mixed-Use Alternative

Alternative 4 would develop the same types of uses as the Project and development would comply with the proposed HI (Hybrid Industrial) zoning proposed for the Project Site under the DTLA 2040 Community Plan Update. Specifically, Alternative 4 would develop 245 live-work units, 18,858 square feet of ground floor retail uses, 245,452 square feet of office uses, and 500 square feet of on-site residential work space, compared to 347 new live-work units, 187,374 square feet of office space, 21,858 square feet of new retail/restaurant floor area, and 926 square feet of artist production amenity space with the Project. Similar to the Project, Alternative 4 would demolish buildings D, E, F, and H on the Project Site and five existing buildings within the northern portion of the Project Site that comprise approximately 56,686 square feet, as well as their 24 parking spaces, would be retained with office, retail, restaurant, warehouse, and live-work units. Total floor area under Alternative 4 would be 569,448 square feet, identical to the Project, and the resulting FAR would be 6:1. This alternative would develop two new buildings: a 30-story residential tower with a maximum height of 350 feet and an 11-story office building with a maximum height of 180 feet. Alternative 4 would provide approximately 30,025 square feet of open space, compared to 71,719 square feet of open space with the Project. The open space provided would include the same amenities as the Project. A total of 809 vehicle parking spaces would be provided in six subterranean parking levels, compared to 828 vehicle parking spaces provided in six subterranean levels with the Project. Alternative 4 would provide 241 bicycle parking spaces, consisting of 47 short-term spaces and 194 long-term spaces, compared to 257 bicycle parking spaces provided by the Project. Vehicular access to the residential subterranean parking would be provided via a driveway accessible through the alleyway on the western side of the Project Site. Residential loading docks and loading area would be located immediately south of the residential parking entrance. Vehicular access to the office subterranean parking would be provided via a driveway located at the southeastern corner of the Project Site along Violet Street. Commercial loading dock and loading area would be located immediately adjacent to the office parking entrance. Pedestrian access would be provided via a new

paseo that connects the existing buildings with the proposed buildings. The entrance to the residential lobby would be located on the eastern side of the residential tower. Primary pedestrian access to the office component would be from an office lobby located along Violet Street within the northeastern corner of the Project site. Access to the retail/restaurant spaces would be provided via several entrances along the paseo.

This alternative would implement a similar building design as the Project, though the residential tower would be shorter and the office tower would be taller. Alternative 4 would also implement similar signage, lighting, vehicular and pedestrian access, setbacks, and sustainability features as those proposed for the Project. Alternative 4 would require fewer discretionary approvals than the Project because the proposed live-work units are permitted under the Project Site's proposed Hybrid Industrial zoning. In addition, the duration of construction would be similar to the Project.

e. Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) 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 the No Project Alternative be the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining Alternatives.

Table V-1 in Section V, Alternatives, of this Draft EIR, provides a summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to CEQA Guidelines Section 15126.6(c), the analysis below addresses the ability of the Alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Alternative 1, the No Project/No Build Alternative, would avoid the Project's significant and unavoidable impacts with respect to on-site noise and vibration during construction and vehicle miles traveled. Alternative 1 would also eliminate the Project's significant and unavoidable cumulative impacts with respect to on- and off-site construction noise, operational noise, and vehicle miles traveled. Alternative 1 would eliminate all of the Project's remaining less-than-significant and less-than-significant-with-mitigation impacts as no changes to the existing conditions would occur. However, Alternative 1 would not meet any of the Project objectives or the Project's underlying purpose to redevelop vacant parcels into a high-density, mixed-use development that provides housing and jobs in the Arts District within the Central City North Community Plan area to a lesser extent than the Project.

As stated above, the CEQA Guidelines require the identification of an Environmentally Superior Alternative other than a No Project Alternative. Accordingly, in accordance with the CEQA Guidelines, a comparative evaluation of the remaining alternatives indicates that Alternative 2, the Zoning Compliant All Commercial Alternative, is the Environmentally Superior Alternative. This Alternative represents a reduced density development that is in accordance with existing zoning designation, height limit, and FAR allowed within the Project Site. However, Alternative 2 would reduce, but not eliminate, the Project's significant and unavoidable cumulative impacts associated with operational noise due to traffic. All other impacts would be less than or similar to those of the Project.

Although Alternative 2 would reduce some of the Project's significant environmental impacts, it would not eliminate any of the Project's significant and unavoidable impacts. In addition, Alternative 2 would not provide any live-work units towards the City's housing objectives and would provide significantly less office and retail/restaurant space compared to the Project. Without new housing, Alternative 2 would not meet two of the Project's objectives pertaining to housing and with the decrease in commercial square footage, would meet the Project's commercial objective a lesser extent than the Project. Alternative 2 would, however, meet the Project's objective to create a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of neighborhood-serving commercial uses on the ground floor level and the incorporation of a pedestrian paseo and courtyard/plaza to connect the existing uses with the new development.