

APPENDIX A

**Notice of Preparation (NOP),
Initial Study, Scoping Meeting
Materials, and NOP Comments**

A-1 Notice of Preparation

**DEPARTMENT OF
CITY PLANNING**

CITY PLANNING COMMISSION

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CITY OF LOS ANGELES

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<http://planning.lacity.org>

April 25, 2017

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

CASE NO.: ENV-2017-249-EIR

PROJECT NAME: 670 Mesquit

PROJECT APPLICANT: RCS VE LLC

PROJECT LOCATION/ADDRESS: 606-694 S. Mesquit Street, 1494-1498 E. 6th Street, and 2119-2135 E. 7th Street, Los Angeles, CA 90021

COMMUNITY PLANNING AREA: Central City North Community Plan Area

COUNCIL DISTRICT: 14 – Jose Huizar

DUE DATE FOR PUBLIC COMMENTS: 4:00 p.m., May 24, 2017

SCOPING MEETING: May 8, 2017. See more information below.

Pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15082, once the Lead Agency decides an Environmental Impact Report (EIR) is required for a project, a Notice of Preparation (NOP) describing the project and its potential environmental effects shall be prepared. You are being notified of the City of Los Angeles' intent, as Lead Agency, to prepare an EIR for this Project, which may be located in an area of interest to you and/or the organization or agency you represent. This EIR will be prepared by outside consultants and submitted to the Department of City Planning, Environmental Analysis Section, for independent review and certification.

The Department of City Planning requests your comments as to the scope and content of the EIR. Comments must be submitted in writing pursuant to directions below. If you represent an agency, the City is seeking comments as to the scope and content of the environmental information in the document which is germane to your agency's statutory responsibilities in connection with the proposed Project. Agencies will need to use the EIR when considering permits or other approvals for the Project.

A Scoping Meeting will be held to receive input from the public as to what environmental topics the EIR should study. No decisions about the Project are made at the Scoping Meeting. The project description, location, and the potential environmental effects identified thus far are set forth in this document. Also included below are the date, time, and location of the Scoping Meeting.

The Scoping Meeting is in an open house format. THIS IS NOT THE REQUIRED PUBLIC HEARING FOR MUNICIPAL CODE ENTITLEMENT REQUESTS which will be scheduled after the completion of the EIR. The environmental file is available for review at the Department of City Planning, 200 North Spring Street, Room 750, Los Angeles, CA 90012. A copy of the Initial Study prepared for the Project is not attached but may be viewed online at <http://planning.lacity.org> by clicking on the “Environmental Review” tab, then “Notice of Preparation & Public Scoping Meetings.”

PROJECT LOCATION: The approximately 237,714-square-foot (sf) (5.45-acre) Project Site is within the Arts District in the Central City North Community Plan Area of the City of Los Angeles. The Project Site consists of eight parcels located along the east and west sides of Mesquit Street between the former 6th Street Bridge right-of-way (ROW) (future Ribbon of Light Bridge) and the 7th Street Bridge, as well as a portion of Mesquit Street that is proposed for vacation. The Project Site is adjacent to properties on both sides of Mesquit Street owned by the Los Angeles Department of Water and Power that house the River Switching Station electricity substation and transmission line ROW (the LADWP Property) south of 6th Street. Land uses to the east of the Project Site include railway lines and rail yards owned by Burlington Northern/Santa Fe Railway, the Los Angeles County Metropolitan Transportation Authority (Metro), and Amtrak (Railway Property), with the Los Angeles River and additional rail lines to the east. The Project Site is currently developed with one- and two-story high-bay buildings housing public and leased cold storage (i.e., Rancho Cold Storage, Hidden Villa Ranch, Integrated Food Service, and Harvey’s Produce) totaling approximately 205,393 sf, together with loading bays and surface parking. The existing zoning designation of the Project Site is M3-1-RIO.

PROJECT DESCRIPTION: RCS VE LLC (the Applicant) proposes to demolish existing cold storage warehouse facilities and construct a mixed-use development totaling approximately 1,792,103 sf of floor area. The Project would include creative office space (approx. 944,055 sf); 308 multi-family residential units, 16 percent of which would be affordable; a hotel (236 rooms); retail (including grocery and farmer’s markets); restaurants; studio, event, gallery and potential museum space; and a gym. The Project would include at- and above-grade landscaped open space including amenities totaling 83,789 sf. Four (4) levels of below-grade parking spanning the Project Site and at- and above-grade structured parking within Buildings 3, 4, and 5 would also be provided. The Project would provide approximately 2,000 parking spaces and 930 bicycle parking spaces. A rooftop heliport is also proposed for emergency and occasional use incidental to residential and office uses, providing an amenity for the Project’s residents, hotel guests, office workers, and visitors. The resulting floor:area ratio (FAR) would be approximately 7.5:1.

The proposed uses would be accommodated in five new buildings ranging in height from 90 feet to 360 feet. Buildings 1 through 4, which would contain residential, hotel, office, and commercial uses, would be oriented in a linear fashion along the east side of Mesquit Street, extending from the LADWP Property on the north to the 7th Street Bridge on the south. The Project would provide three east-west pedestrian passageways and view corridors between Buildings 1 through 4. Building 5, which would contain office uses, would be constructed on the west side of Mesquit Street just north of the 7th Street Bridge. A proposed landscaped area at the northern end of the Project Site (Northern Area) is intended as publicly accessible open space and would connect the Project Site with the Ribbon of Light Bridge and the 12-acre Sixth Street Park, Arts, River, and Connectivity Improvements (PARC) to be located under and adjacent to the Ribbon of Light Bridge. The Project would include two landscaped balconies (River Balconies) along the Project’s eastern edge; the balcony at the northeastern end of the Project Site would provide stairway access

to the Northern Area, Ribbon of Light Bridge, and the Sixth Street PARC.

The Project would include an Equivalency Program to allow the core composition of proposed on-site development to be modified to respond to future needs in a manner that does not increase the Project's impacts on the environment.

As a public benefit contribution, the Applicant proposes significant public benefit commitments related to new transportation and pedestrian improvements and the livability of the neighborhood. The Project would include, pending approval by the railroad/transit operating entities, construction of a pedestrian deck (Deck) over a portion of the Railway Property to the east of the Project Site. The Deck would span the length of the Project Site and directly connect the 7th Street Bridge and northern edge of the Project Site, providing a pedestrian connection to the Ribbon of Light Bridge and the Sixth Street PARC. Construction of the Deck would require approval by the railroad/transit operating entities to permit air rights development above the Railway Property directly adjacent to the Project Site.

REQUESTED PERMITS/APPROVALS: Discretionary entitlements, reviews, and approvals required for implementation of the Project would include, but would not necessarily be limited to, the following:

1. General Plan Amendment to the Central City North Community Plan to change the Community Plan land use designation from Heavy Industrial to Regional Center Commercial, and to change the Circulation Element of the General Plan (the Mobility Plan 2035) and the Community Plan Land Use Map to redesignate Mesquit Street from a Collector Street to a Local Limited Street.
2. Vesting Zone Change and Height District Change from M3-1-RIO to C2-3-RIO.
3. Specific Plan, which could be inclusive of the following:
 - Major Development Project Conditional Use Permit,
 - Vesting Conditional Use for Floor Area Ratio (FAR) Averaging and Residential Density Transfer in Unified Developments,
 - Master Conditional Use for on-site and off-site sale of Alcoholic Beverages,
 - Master Conditional Use for Dance Hall(s),
 - Vesting Conditional Use Permit for Heliport,
 - Special Permission for a Reduction of Off-Street Parking Spaces by the Director,
 - Variance to permit a reduction in the amount of on-site parking spaces otherwise required,
 - Variance to permit off-site parking to be provided at a property more than 750 feet from the Project Site,
 - Variance to permit the siting of bicycle parking spaces at an alternative location,
 - Zoning Administrator's Adjustment to permit a zero-foot setback in lieu of any otherwise required setbacks,
 - Variation from the street dedication requirements under the Mobility Plan 2035, and

- Applicable provisions from the Greater Downtown Housing Incentive Area such as allowing the area of any land required to be dedicated for street or alley purposes to be included as lot area for purposes of calculating the Project's FAR.
4. Three affordable housing incentives through the City's Density Bonus Law: Averaging FAR, Density, Parking, Open Space, and Vehicular Access; FAR increase; and an incentive to allow the area of any land required to be dedicated for street or alley purposes to be included as lot area for purposes of calculating the Project's FAR.
 5. Vesting Tentative Tract Map for the merger and re-subdivision, as well as to absorb a portion of Mesquit Street to be vacated, to create ground lots and airspace lots, together with approval of a haul route.
 6. Development Agreement (20-year).
 7. Other discretionary and ministerial permits and approvals that will or may be required.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: Aesthetics, Air Quality, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services (Fire, Police, Schools, Parks, and Libraries), Recreation, Transportation and Traffic, Tribal Cultural Resources, and Utilities and Service Systems (Water, Wastewater, Energy Use, and Solid Waste).

PUBLIC SCOPING MEETING: A public scoping meeting in **an open house format** will be held to receive public comment regarding the scope and content of the environmental analysis to be included in the Draft EIR. City staff, environmental consultants, and project representatives will be available, but no formal presentation is scheduled. You may stop by at any time between 5:00 p.m. and 7:00 p.m. to view materials, ask questions, and provide comments. The Department of City Planning encourages all interested individuals and organizations to attend this meeting. The location, date, and time of the public scoping meeting for this Project are as follows:

Date: **May 8, 2017**

Time: **5:00 P.M. to 7:00 P.M.**
Arrive any time between 5:00 p.m.–7:00 p.m. to speak one-on-one with City staff and Project consultants.

Location: **Art Share L.A.**
801 E. 4th Place
Los Angeles, CA 90013
(Free parking is available starting at 5 p.m. at the County of Los Angeles Department of Public Social Services employee parking lot, across S. Hewitt Street from Art Share L.A.)

The enclosed materials reflect the scope of the project (subject to change). The Department of City Planning welcomes and will consider all written comments regarding potential environmental impacts of the project and issues to be addressed in the EIR. **Written comments must be submitted to this office by 4:00 P.M., May 24, 2017.** Written comments will also be accepted at the public scoping meeting described above.

Please direct your responses to:

Mail: Jonathan Chang
Major Projects and Environmental Analysis Section
City of Los Angeles Department of City Planning
200 N. Spring Street, Suite 750
Los Angeles, CA 90012

Fax: (213) 978-1343

Email: Jonathan.Chang@lacity.org

ACCOMMODATIONS: As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability. The scoping meeting facility and its parking are wheelchair accessible.


Sign language interpreters, assistive listening devices, or other auxiliary aids and/or services may be provided upon request. Other services, such as translation between English and other languages, may also be provided upon request.

To ensure availability of services, please make your request no later than three working days (72 hours) prior to the scoping meeting by calling Darlene Navarrete at [\(213\) 978-1332](tel:213-978-1332).

Como entidad cubierta bajo el Título II del Acto de los Americanos con Deseabilidades, la Ciudad de Los Angeles no discrimina. La facilidad donde la junta se llevará a cabo y su estacionamiento son accesibles para sillas de ruedas. Traductores de Lengua de Muestra, dispositivos de oído, u otras ayudas auxiliares se pueden hacer disponibles si usted las pide en avance. Otros servicios, como traducción de inglés a otros idiomas, también pueden hacerse disponibles si usted los pide en avance.

Para asegurar la disponibilidad de éstos servicios, por favor haga su petición al mínimo de tres días (72 horas) antes de la reunión, llamando a Darlene Navarrete a [\(213\) 978-1332](tel:213-978-1332).

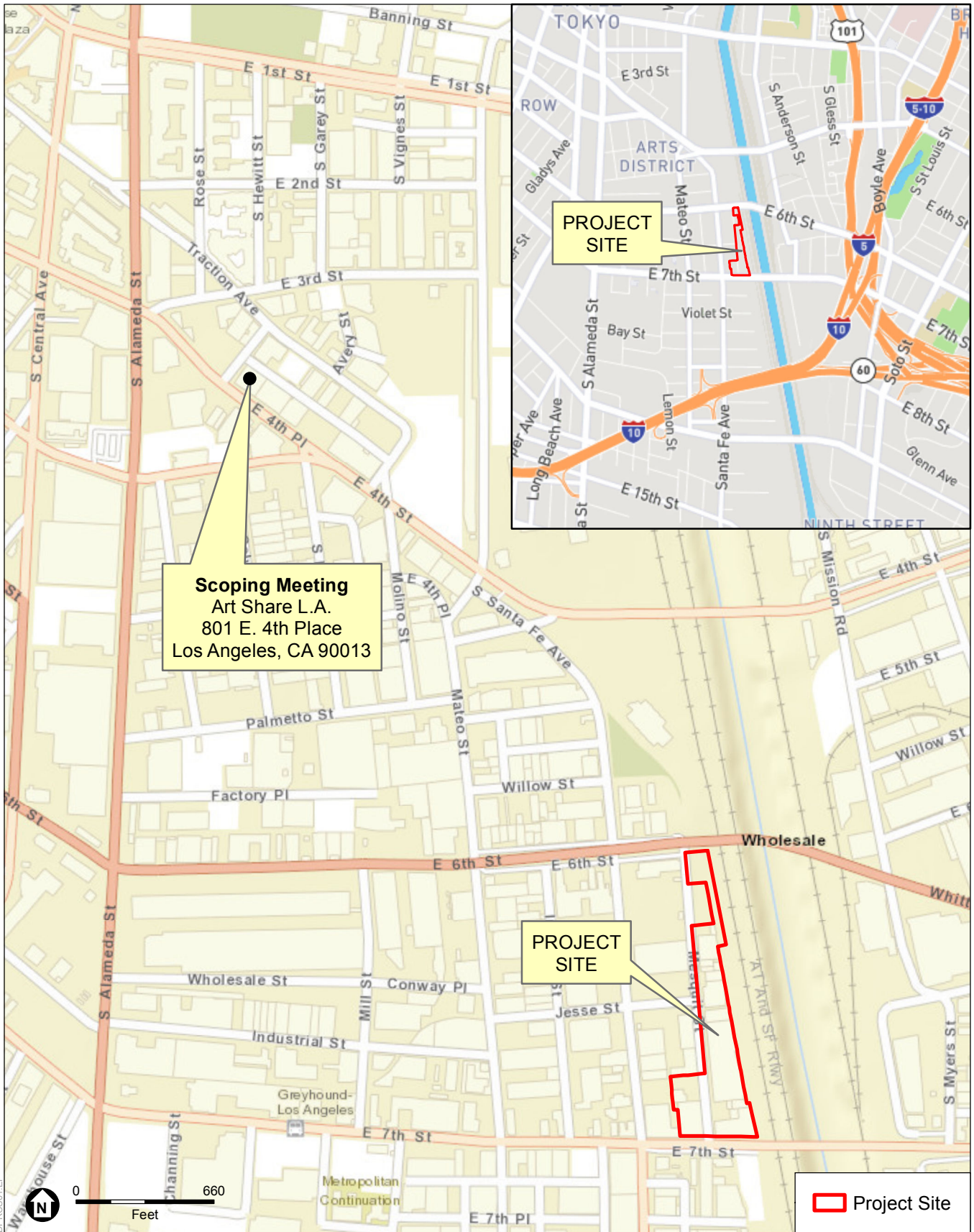
Vincent P. Bertoni, AICP
Director of City Planning



Jonathan Chang
Project Planner

Enclosures:

- 1 Regional and Site Location Map and Scoping Meeting Location
- 2 Aerial Photograph of Project Site
- 3 Conceptual Site Plan
- 4 500-Foot Radius Map

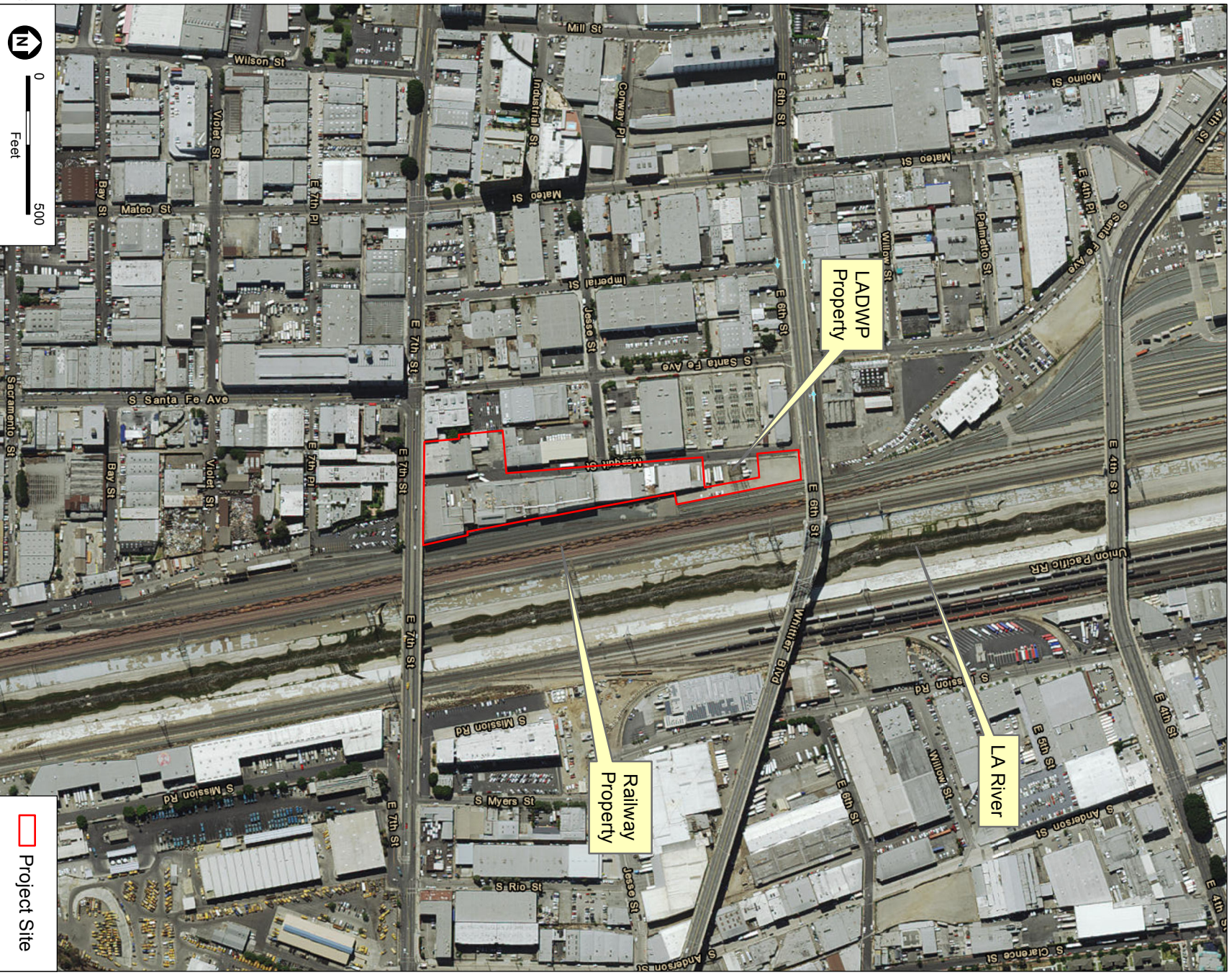


SOURCE: Open Street Map, 2016

670 Mesquit

Figure 1
 Regional and Site Location Map
 Scoping Meeting Location



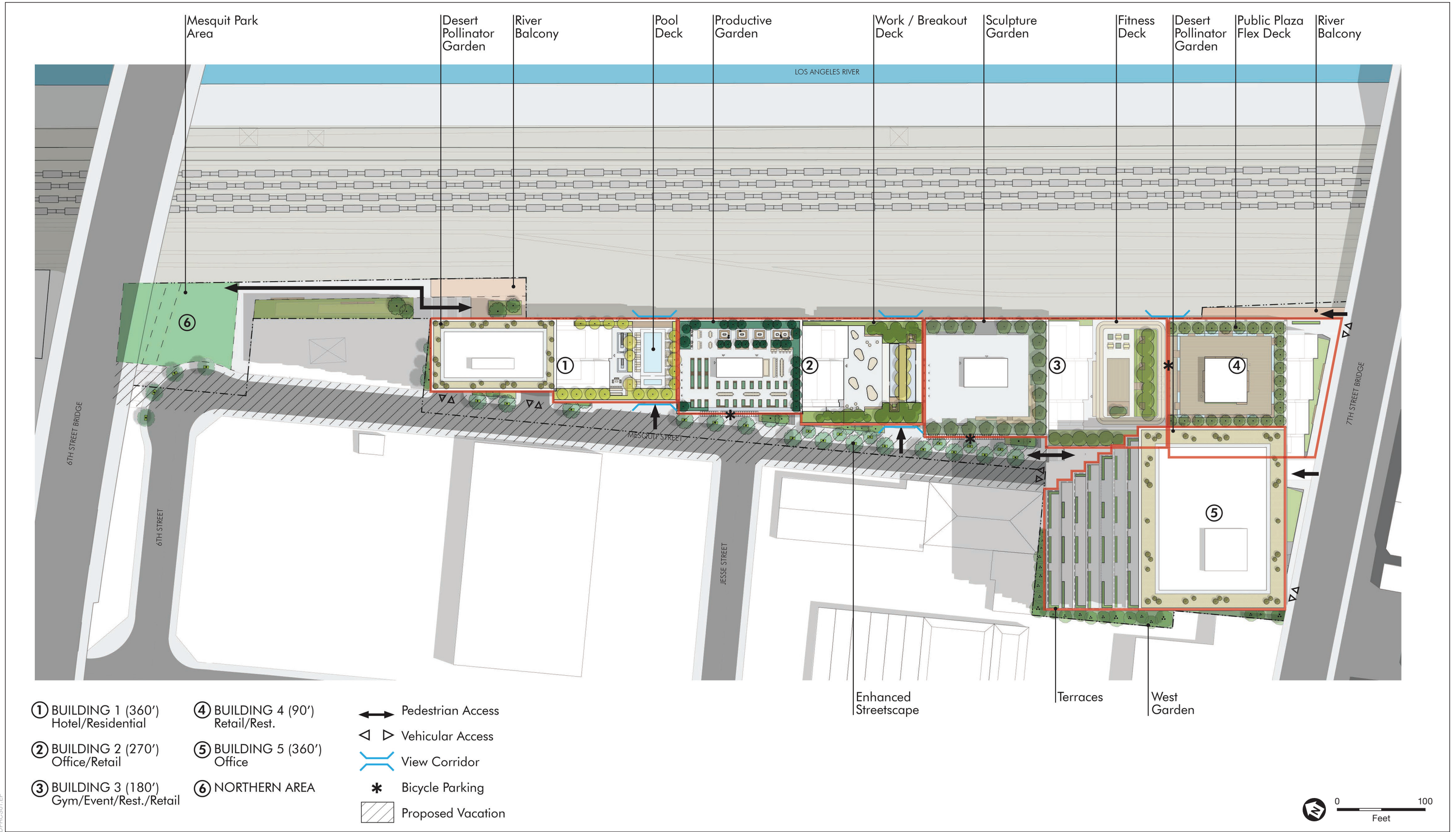


SOURCE: Google Map, 2015 (Aerial)

670 Mesquit

Figure 2
Aerial Photograph of Project Site





SOURCE: Bjarke Ingels Group with Gruen Associates, 2017

670 Mesquit

Figure 3
Conceptual Site Plan



SOURCE: GC Mapping Service Inc., 2017



670 Mesquit
Figure 4
Radius Map

A-2 Initial Study

City of Los Angeles

Department of City Planning • Major Projects & Environmental Analysis Section
City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



INITIAL STUDY

CENTRAL CITY NORTH COMMUNITY PLAN AREA

670 Mesquit Project

Case Number: ENV-2017-249-EIR

Project Location: 606-694 S. Mesquit Street, 1494-1498 E. 6th Street, and 2119-2135 E. 7th Street, Los Angeles, CA 90021

Council District: 14 – Jose Huizar

Project Description: RCS VE LLC (the Applicant) proposes to demolish existing cold storage warehouse facilities totaling approximately 205,393 square feet (sf) and construct a new mixed-use development totaling approximately 1,792,103 sf of floor area on an approximately 237,714 sf (5.45 acres) site at 670 Mesquit Street in the Arts District of Downtown Los Angeles. The development, located in the Central City North Community Plan area, would include creative office space (approx. 944,055 sf); 308 multi-family residential units, 16 percent of which would be affordable units; hotel (236 rooms); and retail (including grocery and farmer's market) (approx. 136,152 sf); restaurants; studio, event, gallery and potential museum space; and a gym. The Project would include at- and above-grade landscaped open space, including recreational amenities, totaling 83,789 sf, four (4) levels of below grade parking spanning the Project Site, and at and above grade parking within Buildings 3, 4, and 5. The Project would provide approximately 2,000 parking spaces and 930 bicycle parking spaces. A rooftop heliport is also proposed for emergency and occasional use incidental to residential and office uses, providing an amenity for the Project's residents, hotel guests, office workers, and visitors. The resulting floor:area ratio (FAR) would be approximately 7.5:1. The existing zoning designation of the Project Site is M3-1-RIO.

The proposed uses would be accommodated in five new buildings ranging in height from 90 feet to 360 feet. Buildings 1 through 4, which would contain residential, hotel, office, and commercial uses, would be oriented in a linear fashion along the east side of Mesquit Street, extending from the former 6th Street Bridge right-of-way and LADWP electricity substation on the north to the 7th Street Bridge on the south. The Project would provide three east-west pedestrian passageways and view corridors between the buildings, two landscaped balconies along the Project's eastern edge, and a balcony in the northern end of the Project Site that would provide access to a proposed landscaped area and pedestrian connection, adjacent to the Ribbon of Light Bridge (6th Street) and the planned 12-acre Sixth Street Park, Arts, River, and Connectivity Improvements (Sixth Street PARC Improvements or PARC) beneath the bridge.

The Project would also include an Equivalency Program to allow the core composition of proposed on-site development to be modified to respond to future needs in a manner that does not increase the Project's impacts on the environment.

As a public benefit contribution, the Applicant proposes significant public benefit commitments related to new transportation and pedestrian improvements. The Project would include, pending approval by the railroad/transit operating entities, construction of a pedestrian deck (Deck) over a portion of the railway property to the east of the Project Site.

The entitlements being requested for the Project include, but may not be limited to, the following:

1. General Plan Amendment to the Central City North Community Plan to change the Community Plan land use designation from Heavy Industrial to Regional Center Commercial, and to change the Circulation Element of the General Plan (the Mobility Plan 2035) and the Community Plan Land Use Map to redesignate Mesquit Street from a Collector Street to a Local Limited Street.
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 - Vesting Conditional Use Permit for Heliport,
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 - Variance to permit off-site parking to be provided at a property more than 750 feet from the Project Site,
 - Variance to permit the siting of bicycle parking spaces at an alternative location,
 - Zoning Administrator’s Adjustment to permit a zero-foot setback in lieu of any otherwise required setbacks,
 - Variation from the street dedication requirements under the Mobility Plan 2035, and
 - Applicable provisions from the Greater Downtown Housing Incentive Area such as allowing the area of any land required to be dedicated for street or alley purposes to be included as lot area for purposes of calculating the Project’s FAR.
4. Three affordable housing incentives through the City’s Density Bonus Law: Averaging FAR, Density, Parking, Open Space, and Vehicular Access; FAR increase; and an incentive to allow the area of any land required to be dedicated for street or alley purposes to be included as lot area for purposes of calculating the Project’s FAR.
5. Vesting Tentative Tract Map for the merger and re-subdivision, as well as absorb a portion of Mesquit Street to be vacated, to create ground lots and airspace lots, together with approval of a haul route.
6. Development Agreement (20-year.).
7. Other discretionary and ministerial permits and approvals that will or may be required.

Applicant: RCS VE LLC 250 Bowery Street, 2 nd Floor New York, NY 10012	Prepared by: ESA 233 Wilshire Boulevard Suite 150 Santa Monica, CA 90401	On Behalf of: City of Los Angeles Department of City Planning Major Projects & Environmental Analysis Section
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CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 360, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY AND CHECKLIST

LEAD CITY AGENCY City of Los Angeles, Department of City Planning	COUNCIL DISTRICT 14, José Huizar	DATE April 25, 2017
RESPONSIBLE AGENCIES Los Angeles Department of Building and Safety, Los Angeles Department of Water and Power, Los Angeles Department of Transportation, Los Angeles Department of Public Works		
PROJECT TITLE/NO. 670 Mesquit	CASE NO. ENV-2017-249-EIR	
PREVIOUS ACTIONS CASE NO. N/A	<input type="checkbox"/> DOES have significant changes from previous actions. <input checked="" type="checkbox"/> DOES NOT have significant changes from previous actions.	

PROJECT DESCRIPTION:

RCS VE LLC (the Applicant) proposes to demolish existing warehouse facilities totaling approximately 205,393 square feet (sf) and construct a new mixed-use development totaling approximately 1,792,103 square feet (sf) of floor area (the Project) on an approximately 237,714 sf (5.45 acres) site at 670 Mesquit Street in the Arts District of Downtown Los Angeles. The development would include creative office space (approx. 944,055 sf); 308 multi-family residential units, 16 percent of which would be affordable units; hotel (236 rooms); and retail (including grocery and farmer's market); restaurant; studio, event, gallery and potential museum space; and a gym. The Project would also include at- and above-grade landscaped open space totaling 83,789 sf, four (4) levels of below grade parking spanning the Project Site, and at and above grade parking within Buildings 3, 4, and 5. The Project would provide approximately 2,000 parking spaces and 930 bicycle parking spaces. A rooftop heliport is also proposed for emergency and occasional use incidental to residential and office uses, providing an amenity for the Project's residents, hotel guests, office workers, and visitors. The resulting floor-area ratio (FAR) would be approximately 7.5:1. The existing zoning designation of the Project Site is M3-1-RIO.

The proposed uses would be accommodated in five new buildings ranging in height from 90 feet to 360 feet. Buildings 1 through 4, which would contain residential, hotel, office, and commercial uses, would be oriented in a linear fashion along the east side of Mesquit Street, extending from the former 6th Street Bridge right-of-way and LADWP electricity substation on the north to the 7th Street Bridge on the south (see Attachment A, Section B, Project Location and Surrounding Uses). The Project would provide three east-west pedestrian passageways and view corridors between the buildings, two landscaped balconies along the Project's eastern edge, and a balcony in the northern end of the Project Site that would provide access to a proposed landscaped area and pedestrian connection, adjacent to the Ribbon of Light Bridge (6th Street), which will include the approximately 12-acre Sixth Street Park, Arts, River, and Connectivity Improvements (Sixth Street PARC Improvements or PARC) located under and adjacent to the Ribbon of Light Bridge. The PARC project is being led by the City of Los Angeles Bureau of Engineering. As a public benefit contribution, the Applicant proposes significant public benefit commitments related to new transportation and pedestrian improvements. The Project would also include, pending approval by the railroad/transit operating entities, construction of a pedestrian deck (Deck) over a portion of the railway property to the east of the Project Site.

The entitlements being requested for the Project include, but may not be limited to, the following:

1. General Plan Amendment to the Central City North Community Plan to change the Community Plan land use designation from Heavy Industrial to Regional Center Commercial, and to change the Circulation Element of the General Plan (the Mobility Plan 2035) and the Community Plan Land Use Map to redesignate Mesquit Street from a Collector Street to a Local Limited Street.

-
2. Vesting Zone Change and Height District Change from M3-1-RIO to C2-3-RIO.
 3. Specific Plan which could be inclusive of the following:
 - Major Development Project Conditional Use Permit,
 - Vesting Conditional Use for Floor Area Ratio (FAR) Averaging and Residential Density Transfer in Unified Developments,
 - Master Conditional Use for on-site and off-site sale of Alcoholic Beverages,
 - Master Conditional Use for Dance Hall(s),
 - Vesting Conditional Use Permit for a Heliport,
 - Special Permission for a Reduction of Off-Street Parking Spaces by the Director,
 - Variance to permit a reduction of the amount of on-site parking spaces otherwise required,
 - Variance to permit off-site parking to be provided at a property more than 750 feet from the Project Site,
 - Variance to permit the siting of bicycle parking spaces at an alternative location,
 - Zoning Administrator’s Adjustment to permit a zero-foot setback in lieu of any otherwise required setbacks,
 - Variation from the street dedication requirements under the Mobility Plan 2035, and
 - Applicable provisions from the Greater Downtown Housing Incentive Area such as allowing the area of any land required to be dedicated for street or alley purposes to be included as lot area for purposes of calculating the Project’s FAR.
 4. Three affordable housing incentives through the City’s Density Bonus Law: Averaging FAR, Density, Parking, Open Space, and Vehicular Access; FAR increase; and an incentive to allow the area of any land required to be dedicated for street or alley purposes to be included as lot area for purposes of calculating the Project’s FAR.
 5. Vesting Tentative Tract Map for the merger and re-subdivision, as well as absorb a portion of Mesquit Street to be vacated, to create ground lots and airspace lots, together with approval of a haul route.
 6. Development Agreement (20-yr.).
 7. Other discretionary and ministerial permits and approvals that will or may be required.
-

ENVIRONMENTAL SETTING:

The Project Site consists of eight parcels located along the east and west sides of Mesquit Street between 6th and 7th Streets in the Arts District of Downtown Los Angeles. The Site is approximately 237,714 sf or 5.45 acres, including a portion of Mesquit Street between 7th Street and 6th Street proposed for vacation. The Site is located within the Central City North Community Plan Area and is designated by the Community Plan as Heavy Industrial and zoned for heavy industrial use within a River Improvement Overlay District (M3-1-RIO). The Property abuts public and private railroad rights-of-way and rail yards to the east, portions of which are owned by Burlington Northern/Santa Fe Railway, Los Angeles County Metropolitan Transportation Authority, and Amtrak (collectively the “Railway Property”). The Los Angeles River is located to the east of the Railway Property. The Hollywood (101) Freeway is located to the east of the Project Site, and the Interstate 10 (I-10) Freeway is located to the east and south of the Project Site.

The Project Site is currently developed with one- and two-story high-bay buildings housing public and leased cold storage facilities (i.e., Rancho Cold Storage, Hidden Villa Ranch, Integrated Food Service, and Harvey’s Produce) totaling approximately 205,393 square feet, together with loading bays and surface parking.

PROJECT LOCATION: 606-694 S. Mesquit Street, 1494-1498 E. 6 th Street, and 2119-2135 E. 7 th Street, Los Angeles, CA 90021		
PLANNING DISTRICT Central City North Community Plan Area		STATUS: <input type="checkbox"/> PRELIMINARY <input type="checkbox"/> PROPOSED <input checked="" type="checkbox"/> ADOPTED
EXISTING ZONING M3-1-RIO	MAX. DENSITY ZONING FAR of 1.5:1 (based on Height District 1)	<input type="checkbox"/> DOES CONFORM TO PLAN

GENERAL PLAN LAND USE & ZONE(S) Heavy Manufacturing	MAX. DENSITY PLAN FAR of 1.5:1 (based on Height District 1)	<input checked="" type="checkbox"/> DOES NOT CONFORM TO PLAN <input type="checkbox"/> NO DISTRICT PLAN
SURROUNDING LAND USES See Attachment A, Project Description, for further discussion.	PROJECT DENSITY FAR of 7.5:1	

 **DETERMINATION (To be completed by Lead Agency)**

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

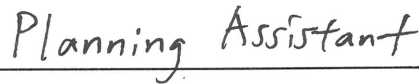
I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



SIGNATURE



TITLE

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

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

PROPONENT NAME

Zach Vella, RCS VE LLC

PHONE NUMBER

(212) 686-2500

PROPONENT ADDRESS250 Bowery Street, 2nd Floor, New York, NY 10012

AGENCY REQUIRING CHECKLIST

City of Los Angeles, Department of City Planning

DATE SUBMITTED

April 25, 2017

PROPOSAL NAME (If Applicable)

670 Mesquit

ENVIRONMENTAL IMPACTS

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state-designated scenic highway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
 II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, PM ₁₀ , and PM _{2.5}) under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IV. BIOLOGICAL RESOURCES. Would the project:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California of Fish and Game or U.S. Fish and Wildlife Service ?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
V. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VI. GEOLOGY AND SOILS. Would the project:				
a. Exacerbate existing environmental conditions so as to increase the potential to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project exacerbating the expansive soil conditions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VII. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, has the potential to exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project have the potential to exacerbate current environmental conditions so as to result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project have the potential to exacerbate current environmental conditions so as to result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
h. Exacerbate existing environmental conditions so as to increase the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IX. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood hazard area as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
X. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XI. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XII. NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XIII. POPULATION AND HOUSING. Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

XV. RECREATION.

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

XVI. TRANSPORTATION/TRAFFIC. Would the project:

a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XVII. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. A resource determine by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XVIII. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

XVIV. MANDATORY FINDINGS OF SIGNIFICANCE.

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



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

PREPARED BY	TITLE	TELEPHONE #	DATE
Jay Ziff ESA 233 Wilshire Blvd., Ste. 150 Santa Monica, CA 90401	Principal Associate	(310) 451-4488	April 25, 2017

ATTACHMENT A

Project Description

A. Introduction

RCS VE LLC (the Applicant) proposes to construct a new mixed-use development totaling approximately 1,792,103 square feet (sf) of floor area¹ (the Project) on an approximately 237,714 sf (5.45 acres) site at 670 Mesquit Street in the Arts District of Downtown Los Angeles.

The development would include creative office space (approximately 944,055 sf); 308 multi-family residential housing units (approximately 307,907 sf), 16 percent of which would be affordable housing²; hotel (approximately 158,647 sf, 236 rooms); and a range of commercial uses including retail uses (including grocery and farmer's market) (approximately 136,152 sf); restaurants (approximately 89,576 sf); studio/event/gallery space and a potential museum (approximately 93,617 sf); and a gym (approximately 62,148 sf). The Project would also include at- and above-grade landscaped open space, including recreational amenities, totaling 83,789 sf, four (4) levels of below grade parking spanning the Project Site, and at and above grade parking within Buildings 3, 4, and 5. The Project would provide approximately 2,000 parking spaces and 930 bicycle parking spaces. A rooftop heliport is also proposed for emergency and occasional use incidental to residential and office uses, providing an amenity for the Project's residents, hotel guests, office workers, and visitors. The resulting floor-area ratio (FAR) would be approximately 7.5:1.

The Project also proposes significant public benefit commitments related to new transportation and pedestrian improvements and the livability of the neighborhood. The Project would include, pending approval by the railroad/transit operating entities, construction of a pedestrian deck (Deck) over a portion of the railway property (defined below) to the east of the Project Site, as discussed in more detail in Subsection F, Public Benefit Contributions of the Project.

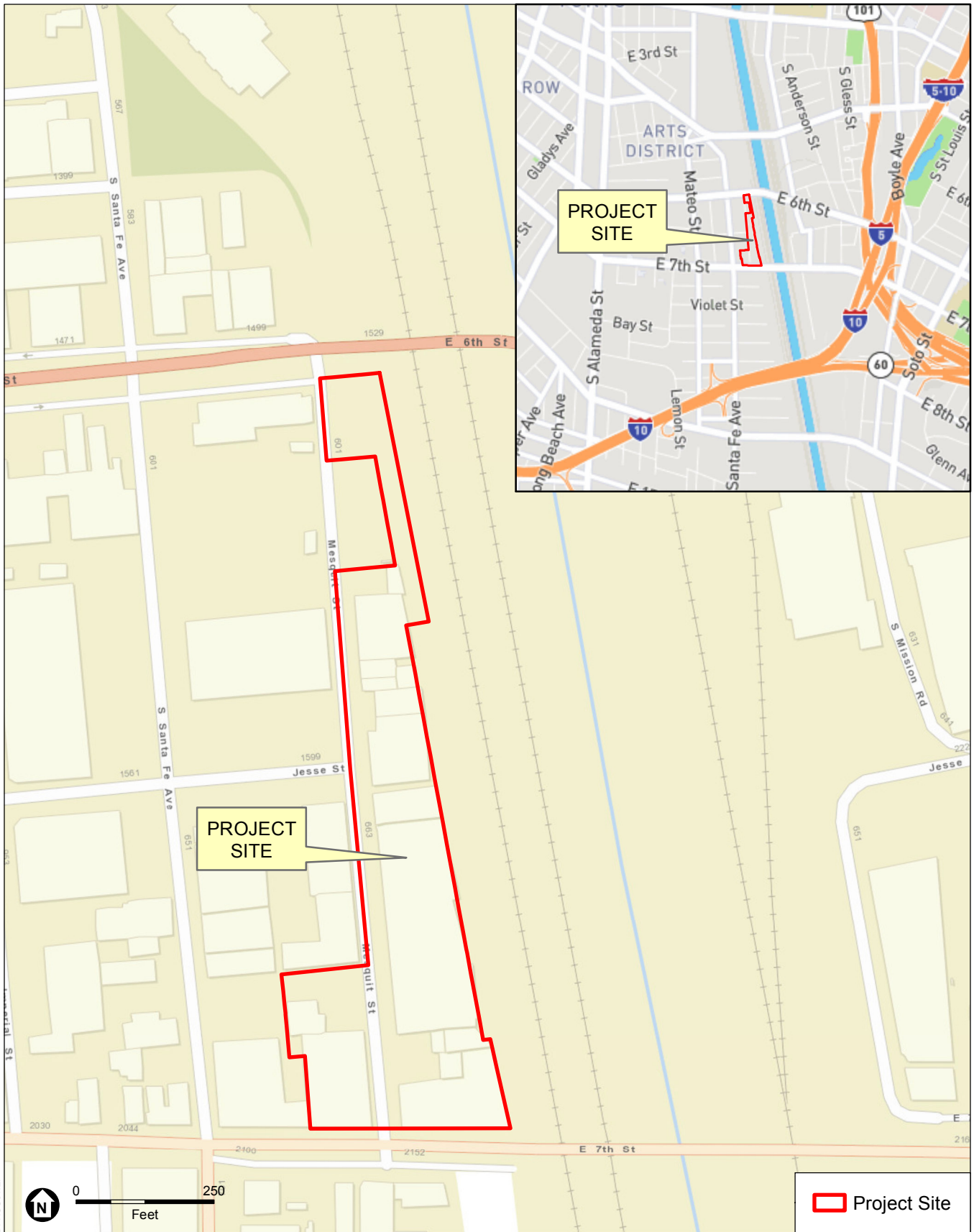
To accommodate the new uses, the Project would remove existing cold storage warehouse facilities on the Project Site consisting of approximately 205,393 sf.

B. Project Location and Surrounding Uses

The Project Site is located within the boundaries of the Central City North Community Plan area within the Arts District of Downtown Los Angeles, as shown on **Figure A-1, Regional and Site**

¹ Project Floor Area is calculated in accordance with Los Angeles Municipal Code (LAMC) Section 12.03, unless otherwise noted.

² The affordable housing component for the Project would be in compliance with Measure JJJ.



SOURCE: Open Street Map, 2016; ESA 2017

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Figure A-1
Regional and Site Location Map

Location Map. The Project Site consists of eight parcels totaling approximately 237,714 sf or 5.45 acres (including the Mesquit Street right of way (ROW) adjacent to the Project Site between 6th Street and 7th Street, which is proposed for vacation – approximately 36,563 sf).³ As depicted on **Figures A-2, Project Site Existing Conditions, and A-3, Aerial Photograph of Project Site and Vicinity**, the Project Site flanks Mesquit Street from the 6th Street Bridge ROW on the north to the 7th Street Bridge on the south. It is adjacent to property on both sides of Mesquit Street owned by the Los Angeles Department of Water and Power (LADWP) that houses the River Switching Station electricity substation and transmission line ROW (the LADWP Property) just south of the 6th Street Bridge. The Railway Property to the east includes railway ROW and rail yards owned by Burlington Northern/Santa Fe Railway, the Los Angeles County Metropolitan Transportation Authority (Metro), and Amtrak, with the Los Angeles River and additional railroad ROW farther to the east. The southern portion of the Project Site also includes property west of Mesquit Street, abutting properties fronting on 7th Street.

North of the Project Site, the recently demolished c. 1930s 6th Street Bridge ROW is currently the site of construction activity for a new multi-modal bridge to be called the “Ribbon of Light” (Ribbon of Light Bridge), which will include the approximately 12-acre Sixth Street Park, Arts, River, and Connectivity Improvements (Sixth Street PARC Improvements or PARC) located under and adjacent to the Ribbon of Light Bridge.⁴ The PARC project is being led by the City of Los Angeles Bureau of Engineering. Other nearby land uses include commercial retail, restaurant, and live/work development across 7th Street to the south, and low-rise industrial and warehouse uses across Mesquit Street to the west, along with a three-story multi-family residential building at the corner of 7th Street and Santa Fe Avenue.

While the Project Site is not currently identified as being in a transit priority area, its location has substantial transit service availability and has been identified for potential future major transit improvements, including a possible future Metro rail station and expansions of LADOT bus lines to provide service to the Arts District, which will be confirmed over the course of the Project’s entitlement approval process. The Applicant will seek confirmation of transit priority area designation based on these plans. The Project Site is currently served by a network of regional transportation facilities that provide access to the greater metropolitan area. Regional access is provided by the Santa Monica Freeway (I-10), located approximately 0.38 miles to the south; the Hollywood Freeway (US 101) and Golden State Freeway (I-5) located approximately 0.37 miles to the east; and the Harbor Freeway (I-110), approximately 2.52 miles to the west. Local access is provided by 6th and 7th Streets, with direct access provided via Mesquit Street and Jesse Street.

Bus and rail service in the area are provided by Metro. The closest Metro bus stop is located at the southwest corner of 7th Street and S. Santa Fe Avenue, approximately 235 feet southwest of the Project Site, and serves Metro Lines 18, 60, and 62, all of which travel east and westbound on 7th Street. Metro Lines 18 and 720 each have a stop at the intersection of 7th Street and Decatur Street, which is located approximately 0.3 miles west of the Project Site, both of which have

³ Assessor Parcel Numbers (APNs) 5164-017-002, -003, -006, -008; 5164-018-009; 5164-016-009, -010, & -803.

⁴ City of Los Angeles Bureau of Engineering, Sixth Street Viaduct Replacement Project, <http://www.sixthstreetviaduct.org/>. Accessed March 30, 2017.

15 minute or less headways during the peak periods. The closest LADOT (A) stop is located at the intersection of Traction Avenue and Merrick Street and is approximately 0.8 miles north of the Project Site. The Greyhound station is located at the southwest corner of 7th Street and Decatur Street, approximately 0.6 miles west of the Project Site.

The closest Metro light rail stations are the Little Tokyo/Arts District Gold Line and Washington Blue Line stations, located approximately 1.0 mile and 1.32 miles from the Project Site, respectively. Union Station is located approximately 1.23 miles to the northwest of the Project Site. These stations provide service between Downtown Los Angeles and Long Beach and provide connections to the 7th Street Metro Center in Downtown and the Metro Blue, Expo, Purple, and Red Lines and various bus lines. Metro is studying the viability of extending the Red or Purple Lines into the Arts District, with stations under consideration at 3rd Street and 6th Street.^{5,6}

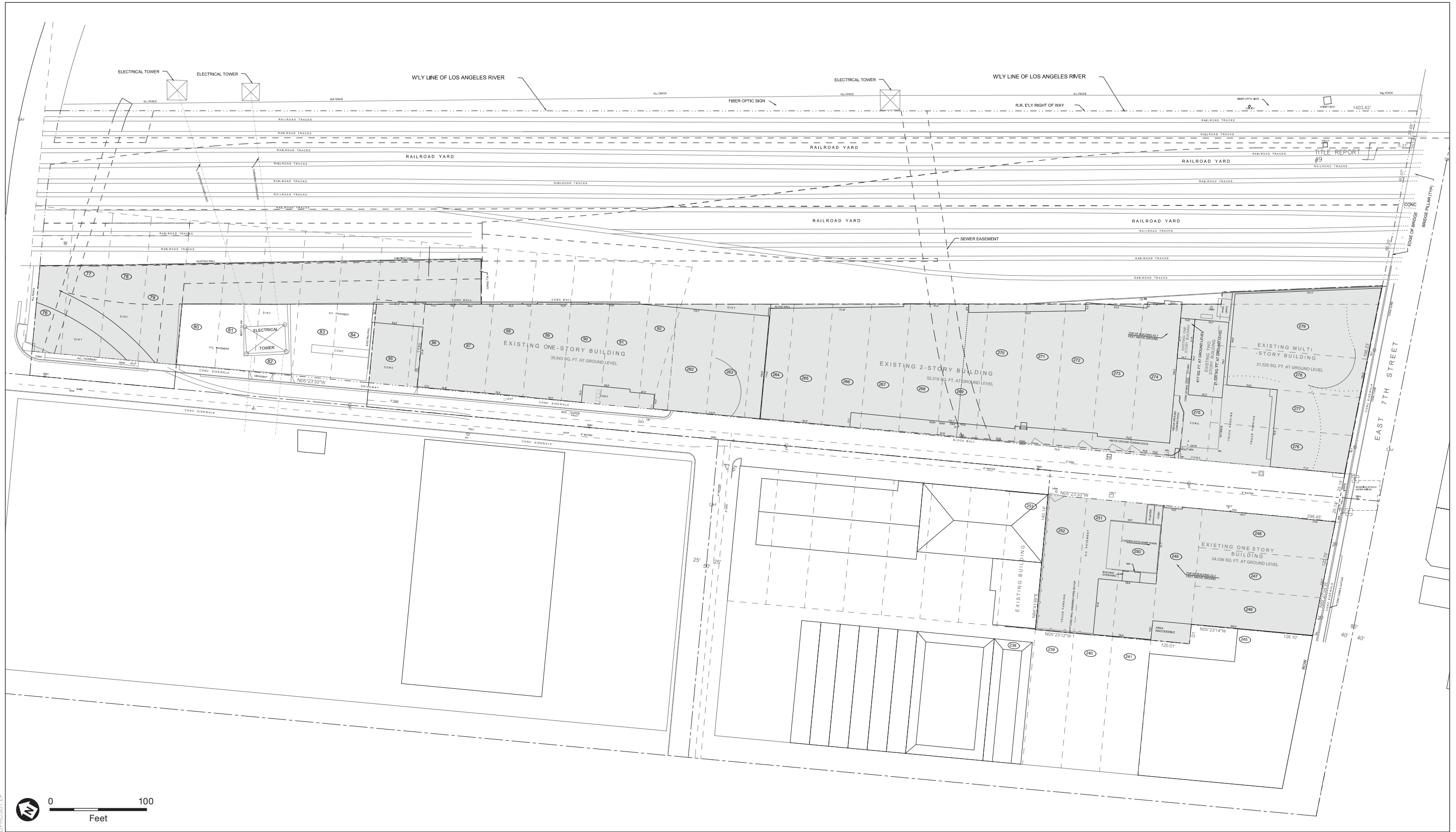
C. Site Background and Existing Conditions

The Project Site is currently developed with existing one- and two-story cold storage facilities consisting of warehouse and wholesale commercial buildings and associated office space, loading docks, and seven surface parking spaces. The existing buildings range from approximately 22 to 61 feet in height and total approximately 205,393 gross sf of floor area. The property owners, the Gallo family, have worked on or adjacent to the property since the 1960s and have owned the primary business operating on the property, Rancho Cold Storage, for over 30 years. Other existing on-site businesses include Hidden Villa Ranch, Integrated Food Service, and Harvey's Produce. Approximately 22 persons are currently employed on the Site.

The City and the property owners are currently negotiating easements for the City's use of portions of the northern end of the Project Site (Northern Area). As depicted on **Figure A-4, City Easements**, the Applicant anticipates granting the City a Viaduct Easement, a Maintenance Access Easement, and a Street Easement in connection with the Ribbon of Light Bridge at 6th Street. In addition, as also depicted on Figure A-4, the City and Applicant are negotiating a Mesquit Park Option, which would grant the City an option to use a portion of the Northern Area as an extension of the PARC.

⁵ Los Angeles County Metropolitan Transportation Authority (Metro), System Safety, Security and Operations Committee, Downtown Los Angeles Arts District Connectivity Board Report, April 19 and 20, 2017. Available at <http://thesource.metro.net/2017/04/17/latest-metro-staff-report-on-issues-involving-an-arts-district-metro-rail-station/>. Accessed April 19, 2017.

⁶ Los Angeles County Metropolitan Transportation Authority (Metro), System Safety, Security and Operations Committee, Downtown Los Angeles Arts District Connectivity Board Report, January 19, 2017. Available at: <https://metro.legistar.com/LegislationDetail.aspx?ID=2938269&GUID=681E0C6A-0CA0-4806-A037-21BCFF25B994>. Accessed March 30, 2017.



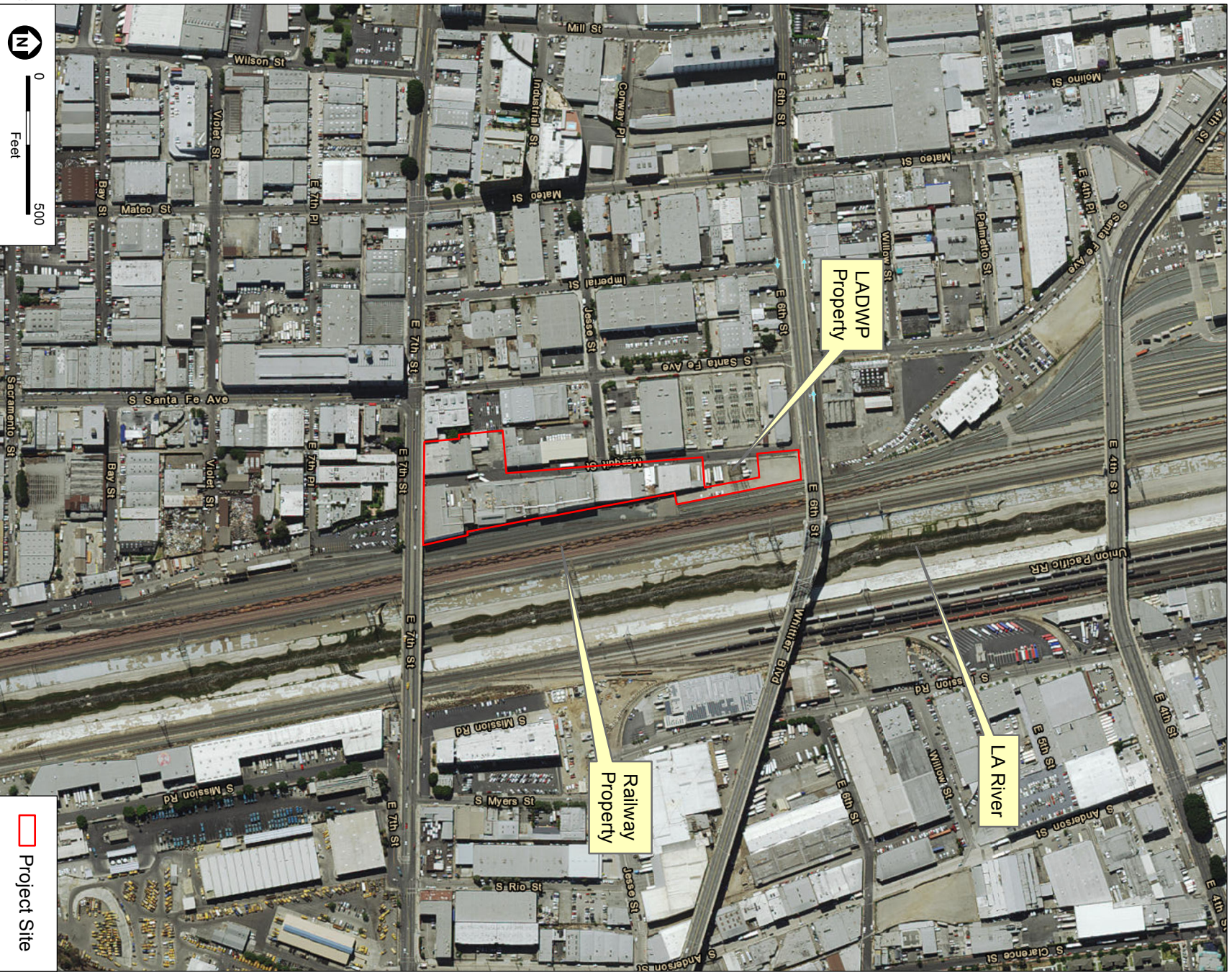
SOURCE: Bjarke Ingels Group with Gruen Associates, 2017

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Figure A-2
Existing Conditions Site Plan



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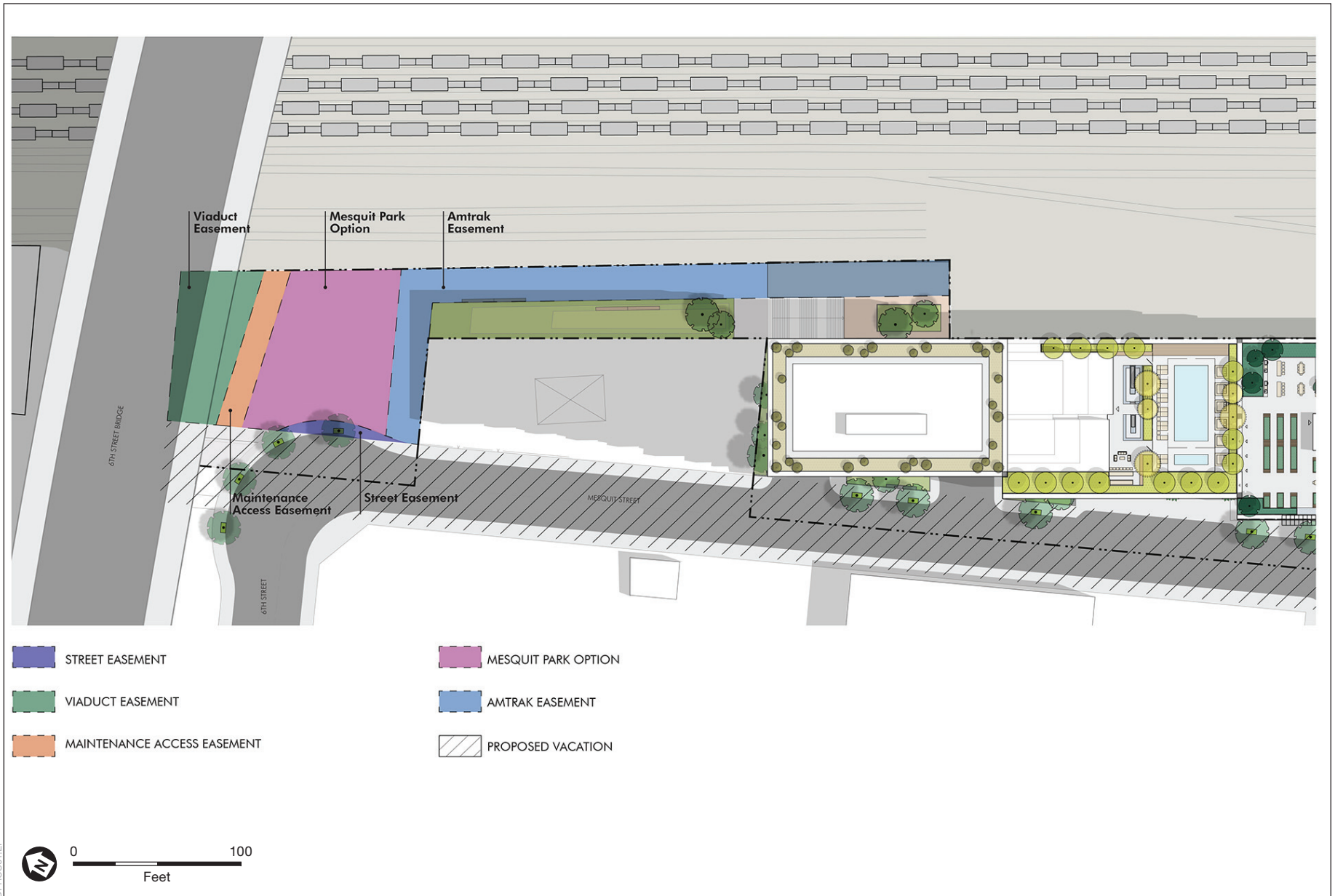


SOURCE: Google Map, 2015 (Aerial)

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Figure A-3
Aerial Photograph with Surrounding Land Uses





SOURCE: Bjarke Ingels Group with Gruen Associates, 2017

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Figure A-4
City Easements

D. Existing Planning and Zoning

The Project Site is located within the Central City North Community Plan Area, the River Improvement Overlay District, the East Los Angeles State Enterprise Zone, the Central City Revitalization Zone, and the Arts District Business Improvement District. The General Plan land use designation for the Project Site is Heavy Industrial and the zoning is M3-1-RIO. The “M3” (Heavy Industrial) zone permits a wide range of industrial and manufacturing uses prevalent in the area such as warehouses, cold storage, and food processing facilities, and also permits commercial and office uses. The “1” indicates Height District 1, which establishes a FAR of 1.5. The “RIO” designation indicates that the Project Site is located within the River Improvement Overlay District, established by Ordinance Nos. 183144 and 183145 to support implementation of the Los Angeles River Revitalization Plan, and establishes landscaping, design criteria, and administrative review procedures for projects within the RIO.

The East Los Angeles State Enterprise Zone and Central City Revitalization Zone were established to stimulate local investment and revitalization of the area.

E. Description of the Project

The Applicant proposes to remove the existing on-site cold storage facilities consisting of approximately 205,393 sf, and to redevelop the Project Site with a mix of uses totaling approximately 1,792,103 sf of floor area on seven proposed ground lots. This would include creative office space (approximately 944,055 sf); approximately 308 multi-family residential units (approximately 307,907 sf, 16 percent of which would be affordable units); approximately 236 hotel rooms (approximately 158,647 sf); retail uses (including grocery and farmer’s market) (approximately 136,152 sf), restaurants (approximately 89,576 sf), studio, event, gallery, and potential museum space (approximately 93,617 sf); and gym (approximately 62,148 sf). The Project would also include at- and above-grade landscaped open space, including recreational amenities, totaling 83,789 sf, four (4) levels of below grade parking spanning the Project Site, and at and above grade parking within Buildings 3, 4, and 5. The Project would provide approximately 2,000 parking spaces and 930 bicycle parking spaces. A rooftop heliport is also proposed for emergency and occasional use. The resultant FAR would be approximately 7.5:1. The proposed development program is summarized in **Table A-1, Proposed Development Program**, and is discussed in more detail below.

**TABLE A-1
PROPOSED DEVELOPMENT PROGRAM**

Use	Size/Area	
Site Area (Gross)	201,151	sf
	4.6	ac
Site Area (Net)	237,714	sf
	5.45	ac
Maximum Building Height	360	feet
	30	floors
Residential (Live/Work Units)		
Studio	73	du
One Bedroom	169	du
Two Bedroom	49	du
Three Bedroom	17	du

Use	Size/Area	
Total Dwelling Units	308	du
Total Residential Floor Area (approx.)	307,907	sf
Commercial (all areas approximate)		
Office	944,055	sf
Retail (including enclosed Grocery and Farmer's Market)	136,152	sf
Restaurant	89,576	sf
Hotel	158,647	sf
Studio/Event/Gallery/Potential Museum	93,617	sf
Gym	62,148	sf
Total Commercial Floor Area	1,484,196	sf
Total Floor Area (Gross, approx.)	1,792,103	sf
Floor Area Ratio (FAR)	7.5:1	
Vehicle Parking Proposed On-Site (approx.)	2,000^a	spaces
LAMC Required Vehicle Parking	2,740^b	spaces
Bicycle Parking Proposed	≥930	spaces
LAMC Required Bicycle Parking	930	spaces
Open Space		
Common Open Space (approx.) ^c	83,789	sf
Private Open Space	0	sf
Total Open Space (approx.)	83,789	sf
LAMC Required Open Space^d	54,825	sf

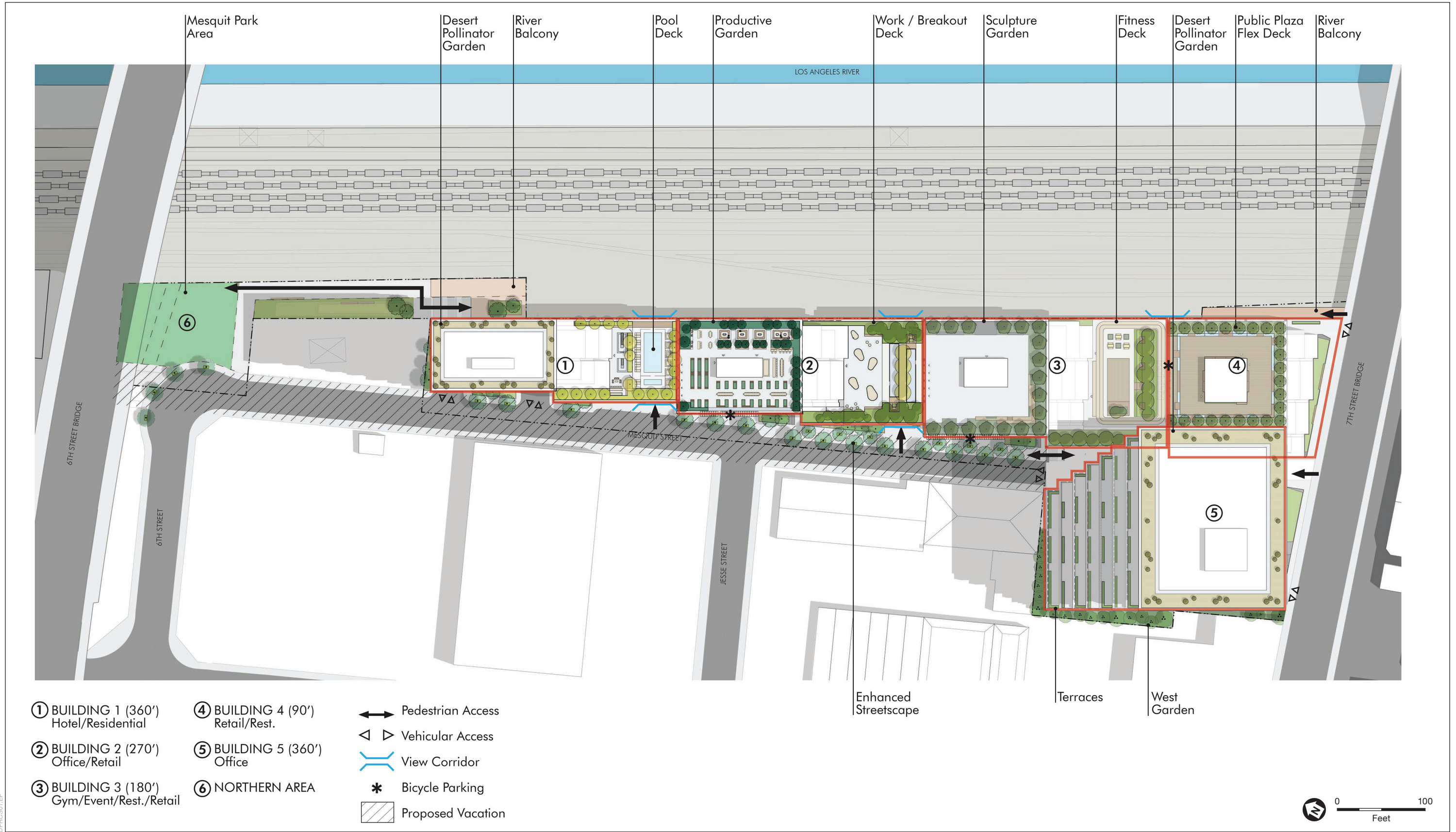
NOTES:

- ^a The proposed number of vehicle parking spaces takes into account the proposed Parking Variance permitted under LAMC §12.27.
- ^b The LAMC required number of parking spaces takes into account reduction permitted under LAMC §12.27 for providing bicycle parking.
- ^c The open space included in this calculation reflects only common open spaces with access by all residents, including Mesquit Park Area, River Balconies, Public Plaza Flex Deck, Sculpture Garden, Productive Garden, Pool Deck, and Streetscape. The proposed Deck intended to provide access to the Los Angeles River is not included in open space calculations.
- ^d Pursuant to Section 12.21G2 of the LAMC, new construction containing six or more dwelling units on a lot shall provide at a minimum the following usable open space per dwelling unit: 100 square feet for each unit having less than three habitable rooms and 125 square feet for each unit having three habitable rooms. There would be 291 dwelling units with less than three habitable rooms and 236 hotel rooms [527 * 100 sf = 52,700 sf] and 17 dwelling units with three habitable rooms [17 * 125 sf = 2,125 sf]. The total LAMC Required Open Space is 54,825 sf.

SOURCE: ESA, January 2017.

The proposed uses would be accommodated in five new buildings atop subterranean and podium parking. Buildings 1 through 4, which would contain residential, hotel, and commercial uses (including office), would be oriented in a linear fashion along the east side of Mesquit Street, extending from the LADWP Property on the north to the 7th Street Bridge on the south. Buildings 1 through 4 would step down to 7th Street, ranging in height from 360 feet in the north to 90 feet in the south (30 floors maximum), and would incorporate east-west view corridors between the buildings to visually connect Boyle Heights, the Los Angeles River, the Arts District, and greater Downtown. Building 5, which would contain primarily office space, would be developed on the west side of Mesquit Street abutting the 7th Street Bridge and would be 360 feet in height (30 floors maximum). A rooftop heliport is also proposed for emergency and other occasional use.

A conceptual site plan showing the proposed buildings and building setbacks, open space, and vehicular and pedestrian circulation on the Project Site is presented in **Figure A-5, Conceptual Site Plan**. The elevations of the proposed buildings are depicted in **Figures A-6 through A-9, Elevations**.

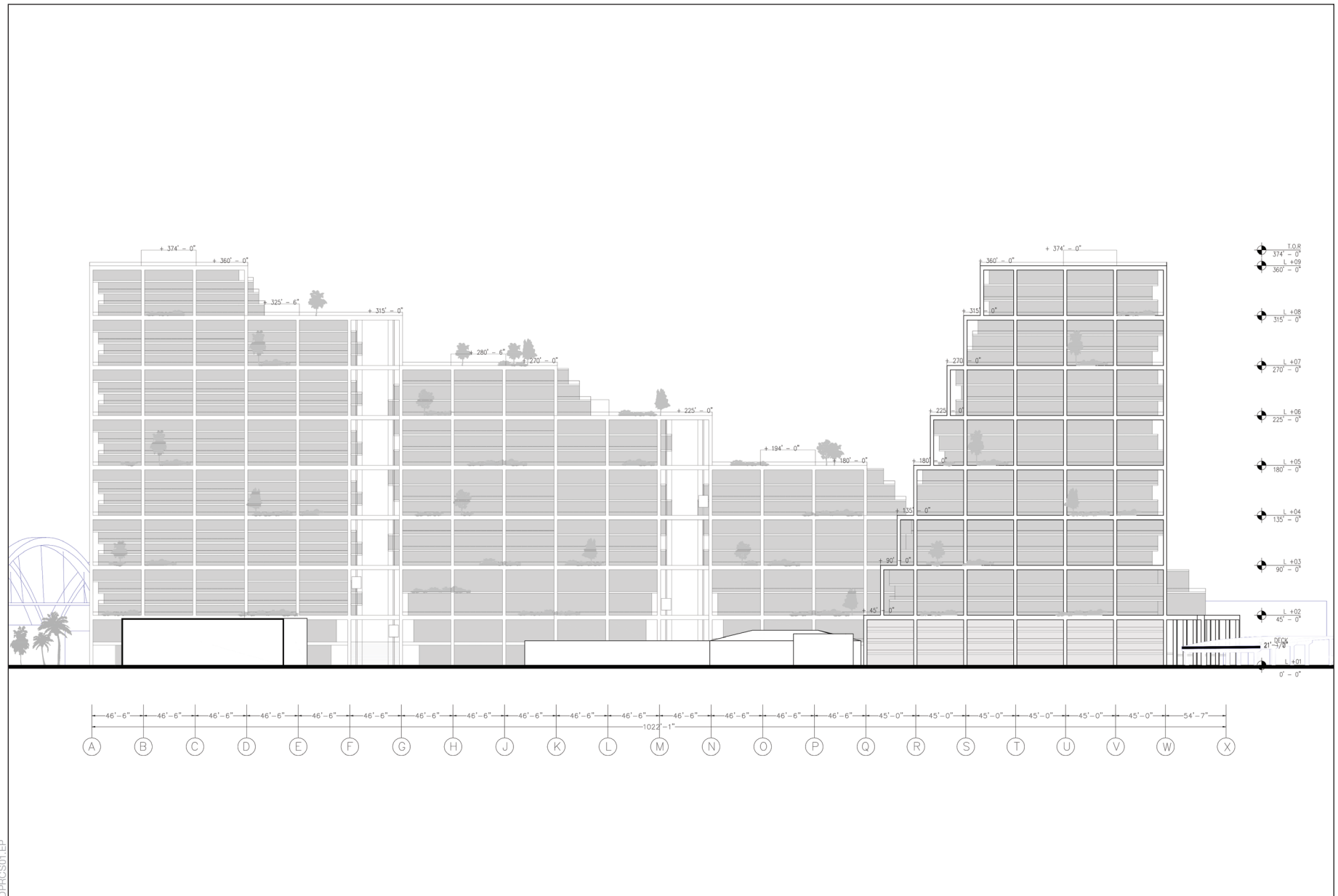


SOURCE: Bjarke Ingels Group with Gruen Associates, 2017

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Figure A-5
Conceptual Site Plan

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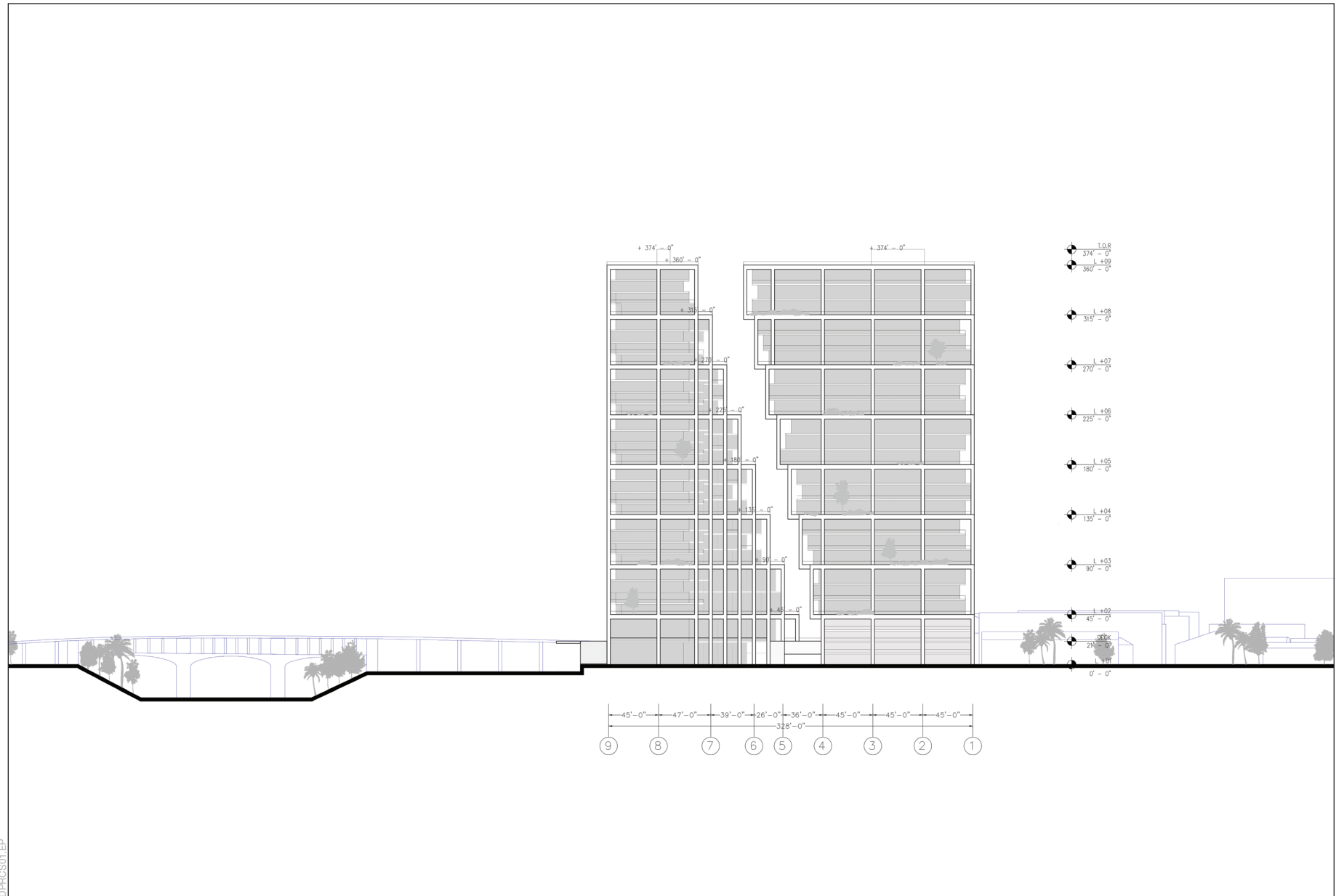
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SOURCE: Bjarke Ingels Group with Gruen Associates, 2017

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Figure A-6
West Elevation





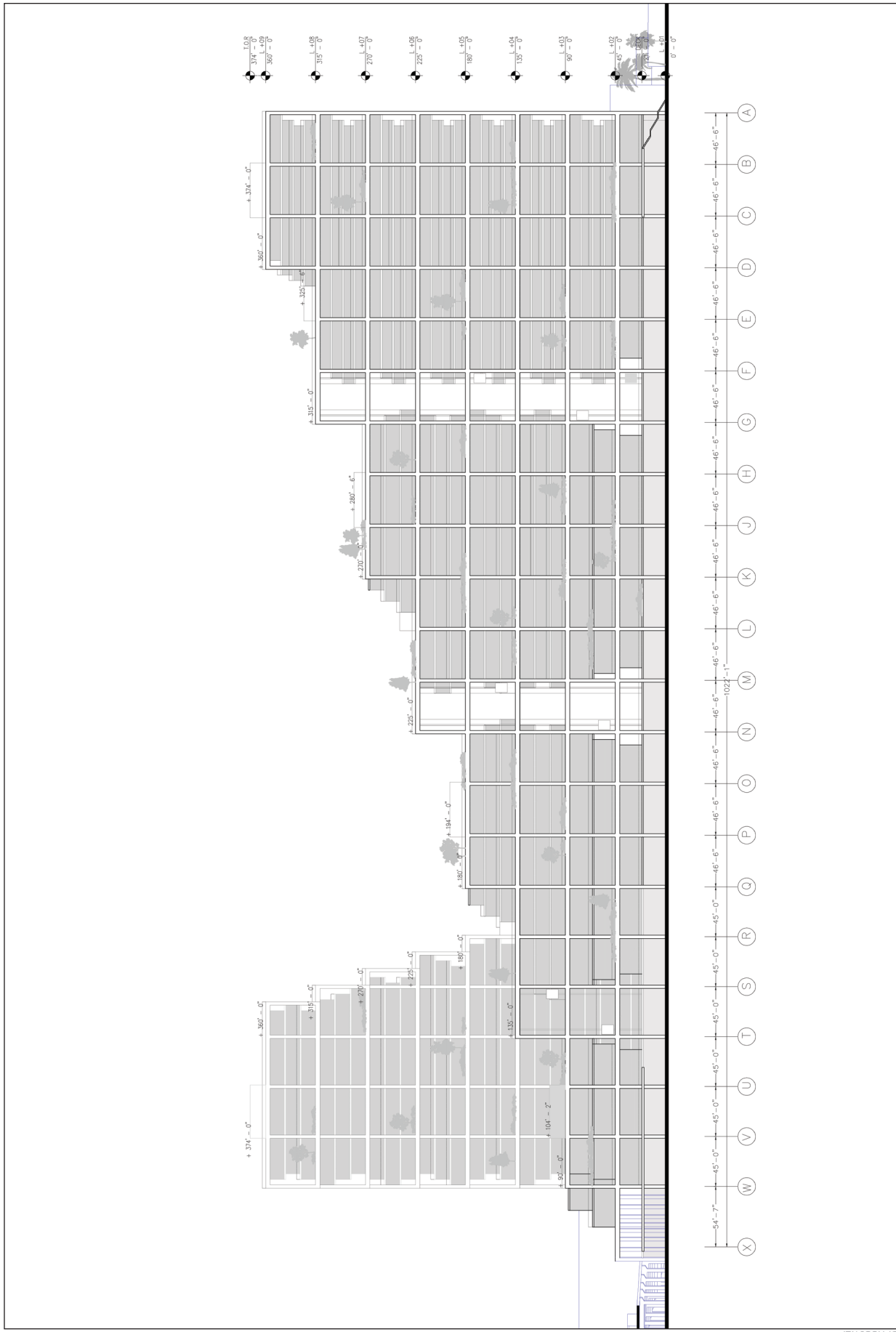
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SOURCE: Bjarke Ingels Group with Gruen Associates, 2017

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Figure A-7
North Elevation





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Figure A-8
East Elevation

SOURCE: Bjarke Ingels Group with Gruen Associates, 2017

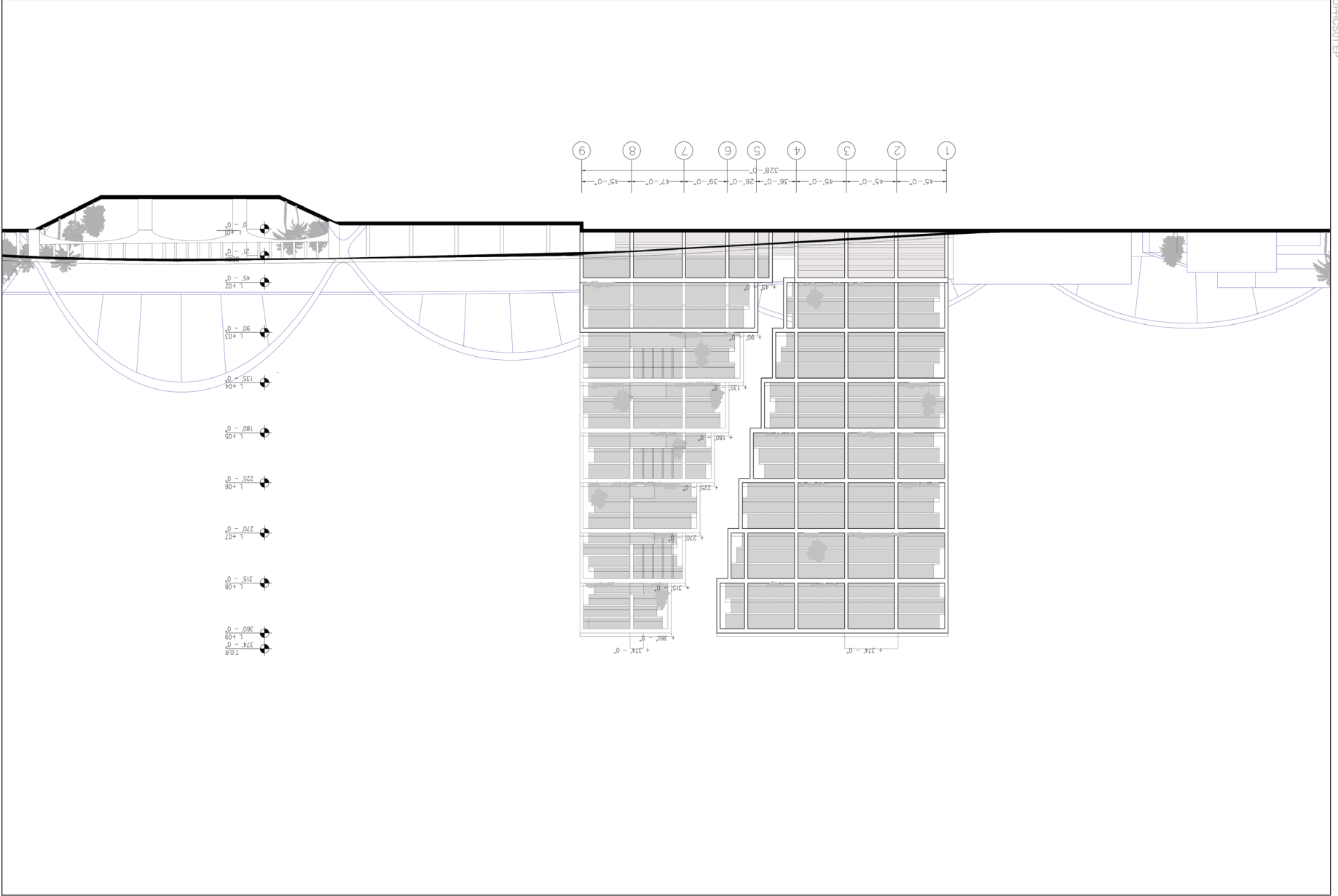


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Figure A-9
South Elevation

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The Project also proposes significant public benefit commitments related to new transportation and pedestrian improvements and the livability of the neighborhood. The Project would include, pending approval by the railroad/transit operating entities, construction of a pedestrian deck (Deck) over a portion of the railway property to the east of the Project Site. Construction of the Deck would require approval by the railroad/transit operating entities to permit the air rights development above the Railway Property directly adjacent to the Project. The Deck would span the length of the Project Site and directly connect the 7th Street Bridge and northern edge of the Project Site, providing a pedestrian connection to the City's planned PARC beneath the Ribbon of Light Bridge. The goals of the Deck include providing additional outdoor space open to the public with views of and connections to the Los Angeles River and beyond. As described in Subsection F, given the scope and potential magnitude of these improvements as a public private partnership to benefit the Arts District community, the Environmental Impact Report (EIR) for the Project will study the environmental impacts of several Deck options.

1. Proposed Land Uses by Building

Building 1 would comprise approximately 466,554 sf of floor area and be approximately 360 feet in height. Uses in Building 1 would include multifamily residential with affordable housing and hotel. heliport would be located on Building 1. Building 2 would be located adjacent to and south of Building 1. Uses in Building 2 would include retail, restaurant, and office and would comprise approximately 331,517 sf of floor area and be approximately 270 feet in height. Building 3 would be located adjacent to and south of Building 2. Proposed uses in Building 3 include retail, restaurant, studio, event, gallery, and potential museum space, gym, and grocery; the building would comprise approximately 239,936 sf of floor area and be approximately 180 feet in height. Building 4 would be located at the southern edge of the Project Site on the east side of Mesquit Street and abutting the 7th Street Bridge. Building 4 would comprise approximately 70,519 sf of floor area and be approximately 90 feet in height, with a potential vehicular and pedestrian connection to the 7th Street Bridge at its southern end. Proposed uses include retail, restaurant, and grocery.

Building 5 would be located at the southern edge of the Project Site on the west side of Mesquit Street and abutting the 7th Street Bridge. Building 5 would be primarily used for office and would comprise approximately 683,577 sf of floor area and be approximately 360 feet in height. The Project proposes above-grade parking within Building 5, including a vehicular connection to the 7th Street Bridge. A proposed heliport would be located on Building 5 in addition to that proposed on Building 1.

2. Proposed Recreational and Open Space Amenities

The Project would incorporate open-air and indoor common open space for use by Project residents, hotel guests, employees and the general public and visitors.

Three major pedestrian passageways (Entry Plazas) are proposed between Mesquit Street and the eastern edge of the Project Site and would visually connect Boyle Heights, the Los Angeles River, the Arts District, and greater Downtown. The Entry Plazas would be located between each of the Buildings 1-4 and would provide midblock access to the Project, the planned pedestrian

Deck, and two landscaped balconies, which are located along the northeast edge of Building 1 and along the southeast edge of Building 4 (River Balconies). The River Balconies and Deck would provide expansive views from the Project Site's eastern edge, overlooking the Railway Property, Los Angeles River, Ribbon of Light Bridge, and PARC. The Deck, as a proposed public benefit, could include such amenities as a sculpture park, benches and seating areas, and other visitor-serving uses. Figure A-5, Conceptual Site Plan, shows a composite of the proposed recreational and open space amenities on the Project Site, as well as the proposed buildings.

A proposed landscaped area at the northern end of the Project Site (Northern Area) is intended as publicly accessible open space and would connect the Project Site with the PARC beneath the Ribbon of Light Bridge. As described in Subsection C, Site background and Existing Conditions, the City may also use portions of the Northern Area for viaduct, maintenance, and street purposes, as well as an extension of the PARC. The Northern Landscaped Pedestrian Connection could also provide a connection in the future to an adjacent 6th Street Station for the potential Red and Purple Line extension, if this location is selected by Metro.⁷ It could also provide bicycle infrastructure and/or support bicycle access in the area, as 7th Street is a designated Tier 3 Bicycle Lane.⁸ The northeast River Balcony would provide stairway access to the Northern Area.

Proposed upper-story open space amenities include a series of terraced walkways that would interconnect the different buildings and create indoor and outdoor spaces, as well as larger rooftop decks with seating and other amenities. Some of the upper-story terraced walkways and decks would be accessible by the general public, while others would be for the use of Project residents, hotel guests, or employees only. They would provide panoramic views of the Downtown skyline, Los Angeles River, and distant vistas.

Finally, the Project would include long-and short-term bicycle parking and related amenities and proposes indoor gym facilities and an outdoor deck for recreational use by Project residents.

A total of approximately 83,789 sf of open space is proposed across the Project Site, which exceeds the LAMC requirement for 54,825 sf for the proposed mix of uses.

3. Proposed Land Use Designation and Zoning

Development of the Project would require a General Plan Amendment, Vesting Zone Change and Height District Change, and other entitlements and approvals listed in Subsection G, Anticipated Project Approvals.

The General Plan Amendment would change the current land use designation from Heavy Industrial to Regional Center Commercial. This would allow multi-family residential uses with

⁷ Los Angeles County Metropolitan Transportation Authority (Metro), System Safety, Security and Operations Committee, Downtown Los Angeles Arts District Connectivity Board Report, January 19, 2017. Available at: <https://metro.legistar.com/LegislationDetail.aspx?ID=2938269&GUID=681E0C6A-0CA0-4806-A037-21BCFF25B994>. Accessed March 30, 2017.

⁸ City of Los Angeles Department of City Planning, Mobility Plan 2035, An Element of the General Plan, December 2015. Available at: https://losangeles2b.files.wordpress.com/2015/12/mobilityplan_web_dec03_2015.pdf. Accessed March 30, 2017.

affordable housing and hotel uses not permitted by the Heavy Industrial land use designation, and would be consistent with the ongoing transition of the Arts District from increasingly obsolete warehouse uses to residential mixed-use development, artist's lofts and studios, and related uses. The General Plan Amendment would redesignate Mesquit Street from a Collector Street to a Local Limited Street to better reflect Mesquit Street's anticipated function.

The Vesting Zone Change and Height District Change would change the current zoning from M3-1-RIO to C2-3-RIO. This would allow multi-family residential uses with affordable housing and hotel uses not permitted in the M3 zone and would correspond to the Regional Center Commercial land use designation. The height district change from Height District 1 to Height District 3 would allow for up to a 10:1 FAR.

The Project includes a Land Use Environmental Equivalency Program that would allow the mix of proposed on-site development to be modified to respond to future needs in a manner that would not increase the Project's impacts on the environment. Within this framework, land uses could be exchanged for certain other permitted land uses within and between buildings so long as the limitations of the Equivalency Program are satisfied and no additional environmental impacts occur. All permitted land use increases could also be exchanged for corresponding decreases of other land uses. As such, the number of residential units, hotel rooms, commercial uses, and other uses and square footages described in this Project Description could be subject to adjustment pursuant to the Equivalency Program.

4. Design and Architecture

Architect Bjarke Ingels, with Bjarke Ingels Group, has designed the Project. The five proposed buildings would be constructed in a contemporary architectural style with transparent façades and an articulated, three-dimensional, stepped design that decreases in scale to merge with the surrounding neighborhood. The transparent, stepped building profile, along with upper-story landscaped terraces and rooftops, and at-grade open space elements engage and open the Project Site up to the neighborhood and broader community in all directions, including 6th Street (and the proposed Ribbon of Light Bridge and PARC) to the north, 7th Street to the south, the Arts District to the west, and the LA River and Boyle Heights to the east. The overall design approach is intended to complement the industrial character of the Arts District and proposed building materials would include concrete, steel, and glass, reflecting materials prevalent in the neighborhood.

The buildings are designed to provide occupants with expansive views of the surrounding neighborhood, downtown Los Angeles, the Ribbon of Light Bridge, PARC, and Boyle Heights and points east. As depicted in **Figures A-10** through **A-12**, *Renderings*, the proposed Entry Plazas serve as oversized, nearly full-height east-west view corridors between each of the Buildings 1-4. Buildings 4 and 5, flanking Mesquit Street, would also maintain visual separation and display stepped, and inverted profiles to frame north/south views along Mesquit Street and through the Project from the north and south.



View looking east.

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SOURCE: Bjarke Ingels Group with Gruen Associates, 2017

670 Mesquit

Figure A-10
Rendering





View looking east from Mesquit Street.

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SOURCE: Bjarke Ingels Group with Gruen Associates, 2017

670 Mesquit

Figure A-11
Rendering





View from project interior looking south toward 7th Street Bridge.

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SOURCE: Bjarke Ingels Group with Gruen Associates, 2017

670 Mesquit

Figure A-12
Rendering

5. Landscaping and Green Space

The Project Site contains no existing trees or vegetation, including in any adjoining ROW. The Project would integrate landscape plantings throughout the Project Site, including at grade, as part of the Deck on the eastern side of the Project Site, on upper-story terraced walkways and decks, and on building rooftops, as shown in Figure A-5. Of the approximately 83,789 sf of open space proposed across the Project Site, approximately 26,491 sf or 31 percent is proposed to be landscaped; this exceeds the LAMC requirement that 25 percent (13,706 sf) of the required open space (54,825 sf) be “softscape”.

Collectively, the landscape plan introduces a variety of green spaces into the predominantly industrial neighborhood, as well as reestablish physical, visual, and ecological connections between the Arts District, Project Site, and Los Angeles River. Specific benefits of the proposed landscape plan include a more comfortable climate through creation of shaded spaces, increased visual interest, fostering local habitat, and managing stormwater. More broadly, the Project is intended to complement the Los Angeles River Revitalization Master Plan, a major ongoing initiative to establish the Los Angeles River as a “front door” to the City through, among other stated goals, the provision of recreational space and open space, new trails, and improved natural habitat within the river corridor; the provision of public access; and enhancement of riverfront communities through the provision of open space, housing, retail spaces, educational facilities, and other public institutions.⁹ The Project proposes to collocate these and other uses, on the Project Site, together with open space and pedestrian views of and access to the River. The Project would also provide a connection to the PARC to be located under and adjacent to the Ribbon of Light Bridge, immediately north of the Project Site. The Project includes a diversity of plant materials in outdoor spaces. Specifically, the landscape strategy and plant palette for the Project Site focuses on plant communities historically present within or in proximity to the Los Angeles River at grade and on lower-story decks and terraces, transitioning to plants from more arid plant communities on upper stories.

Landscape plantings would be sustainable and water-efficient, featuring California native and Mediterranean low-water-use plants. Approximately 151 trees (24-inch boxes) would be planted on the Project Site, including street trees. Landscaping would also be installed in on-site locations visible from the Los Angeles River in accordance with the LA RIO Ordinance. Different plantings are proposed and would include shrubs and perennials, groundcover, grasses, and cacti and succulents, depending on location and use.

The Project’s proposed Northern Area would be landscaped in a manner compatible with the adjacent off-site PARC beneath the Ribbon of Light Bridge (on 6th Street). The planting of sycamore and willow trees, together with understory plantings and a swale system, could be designed to receive, detain and release/infiltrate stormwater and contribute to compliance with the City’s Low Impact Development, or LID, ordinance requirements. In addition, as discussed in the

⁹ City of Los Angeles Bureau of Engineering, Los Angeles River Revitalization Master Plan (Archive), at: http://boe.lacity.org/lariverrmp/Background/master_plan.htm. See also, Los Angeles River Revitalization: <http://lariver.org/>. Accessed March 30, 2017.

Subsection F below, the Project is supporting creation of a pedestrian Deck adjacent to the Railway Property and Los Angeles River.

6. Access, Circulation and Parking

Vehicular and bicycle access to the Project Site is anticipated to be obtained via four driveways: a (1) two-way full-access driveway on Mesquit Street at the northern end of the Project at ground level; (2) a two-way full-access driveway on Mesquit Street at the southern terminus of the street at ground level; (3) a proposed two-way signalized full-access driveway connecting to the 7th Street Bridge to the third level of Building 4 near the southeastern corner of the Project Site; and (4) a proposed two-way right-turn-in/right-turn-out-only driveway connecting to the 7th Street Bridge to the second level of Building 5 near the southwestern corner of the Project Site. The signalized and non-signalized driveways at 7th Street are subject to approval of the Los Angeles Department of Transportation (LADOT). In addition, a passenger loading zone pull-out would be provided along the east side of Mesquit Street north of Jesse Street.

Primary service access would be provided via loading docks located within the ground level of the parking structure. Trucks would enter and exit the structure via the driveway near the southern terminus of Mesquit Street. Turnaround capability would be provided within the structure. Secondary service access for the residential and hotel uses would be provided at the northern end of the Project Site, accessed via the driveway on Mesquit Street at the northern end of the Project.

As previously indicated, pedestrian circulation would include three Entry Plazas between the buildings providing midblock access to the Project, River Balconies, and the proposed Deck, overlooking the Los Angeles River, and the Ribbon of Light Bridge and PARC. The northeast River Balcony would also include a stairway connecting to the Northern Area, PARC, and potential future Metro 6th Street Station.¹⁰ In addition, as discussed in Section F, the Project is supporting creation of a pedestrian Deck adjacent to the Railway Property and Los Angeles River.

The Project includes the construction of parking at, above, and below grade. The Project proposes four levels of below grade parking, spanning the Project Site. There would also be at- and above-grade parking located within Buildings 3, 4, and 5. The Project would provide approximately 2,000 on-site vehicle parking spaces on-site (to serve all uses). In the event the Project is phased, construction of the underground parking may also be phased. As an interim condition during phased construction, surface parking and/or temporary on-site parking facilities and/or temporary off-site parking facilities would accommodate parking demand. If additional parking is required for the Project, parking would be secured off-site and a worker shuttle to the Project Site provided if necessary (i.e., if off-site parking is beyond walking distance). The Project would also provide approximately 930 bicycle parking spaces on-site. Bicycle parking would be stationed in various locations throughout the Project Site and provide both short-term spaces and long-term storage.

¹⁰ Los Angeles County Metropolitan Transportation Authority (Metro), System Safety, Security and Operations Committee, Downtown Los Angeles Arts District Connectivity Board Report, January 19, 2017. Available at: <https://metro.legistar.com/LegislationDetail.aspx?ID=2938269&GUID=681E0C6A-0CA0-4806-A037-21BCFF25B994>. Accessed March 30, 2017.

7. Lighting, Signage and Fencing

On-site lighting would be designed to provide clear identification of the location of major tenants, as well as to highlight pedestrian and vehicle entrances and exits, architectural features, and certain landscape elements, and to meet public safety standards. Exterior lighting would be shielded or directed toward the areas to be lit to limit light spillover onto off-site uses in compliance with applicable LAMC lighting standards and RIO design standards.

Project signage would comply with the City’s sign regulations and would be designed to be compatible with Proposed Project building architecture. New sources of illumination would include low-level external lighting and internal halo lighting. Signs would include building and general ground-level and wayfinding pedestrian signage and would be architecturally integrated into the design of the buildings. Future tenants may elect to submit discretionary sign requests for specific businesses.

New fencing and gates may be provided around the perimeter of the Project Site. Fencing and gates would comply with applicable LAMC standards and RIO design standards.

8. Site Security

The Project would incorporate a security program to ensure the safety of Project residents, customers, and visitors. The buildings would include controlled access of the multifamily residential and hotel units and common open space areas. Access to commercial and restaurant uses, publicly-accessible open space areas, and paseos would be unrestricted during business hours, with public access discontinued after businesses have closed. Facility operations would include staff training and building access/design to assist in crime prevention efforts and to reduce the demand for police protection services. Site security would include provision of 24-hour video surveillance and full-time security personnel. Duties of the security personnel would include, but would not be limited to, assisting residents and visitors with Site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and patrolling the property. Project design would also include lighting of entryways, publicly-accessible areas, and common building and open space residential areas for security purposes.

9. Special Events

Special events, such as resident and employee gatherings, art shows, conferences, and other community events could potentially be held within the Project buildings or outdoor open space areas. Such events would typically be restricted to daytime and evening (before midnight) hours. Special events, depending on size and type, may be subject to City special event permits, event management plans, and applicable LAMC noise requirements.

10. Sustainability Features

The Project would be designed to meet the standards of the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Silver certification or its equivalent. The Project would also comply with the City’s Green Building Code, which builds upon and sets higher standards than those incorporated in the 2010 California Green Building

Standards Code (CALGreen). Some of the Project's proposed design features that would contribute to energy efficiency include cool roofs; electric vehicle chargers/spaces; energy-efficient appliances; water-efficient plumbing fixtures and fittings; and water-efficient landscaping.

The Project will also promote bicycle transportation by providing 930 bicycle parking spaces. The Project's infill location will promote the concentration of development in an urban location with extensive infrastructure.

11. Anticipated Construction Schedule

Project construction is anticipated to commence as early as 2019 and be completed as early as 2022 or as late as 2040. The Project could be constructed in a single phase. Alternatively, the design of Buildings 1–5 would enable the Project to be built in separate phases over time. In the event the Project is phased, construction of the underground parking may also be phased. As an interim condition during phased construction, it is possible that surface parking and/or on-site parking structures and/or off-site parking structures could be constructed to accommodate parking demand.

Construction would include approximately 407,000 cubic yards of grading (cut), all of which would be exported from the Project Site, with excavations averaging 47 to 53 feet below the ground surface (bgs) for the lowest subterranean parking structure level and maximum excavations up to approximately 63 feet bgs.

In order to ensure timely Project completion, construction hours would occur Monday through Saturday in accordance with the LAMC. Construction hours could extend beyond these hours if required and specifically permitted by the City.

F. Public Benefit Contributions of the Project

The Project also proposes significant public benefit commitments related to new transportation and pedestrian improvements and the livability of the neighborhood. to provide enhanced public access to the Los Angeles River, which is situated to the east of the Railway Property (the Los Angeles River and Railway Property are collectively referred to as the River Properties). Within the Applicant's existing land ownership, areas at the northeastern and southeastern edges of the Project Site have been identified as River Balconies, which would provide expansive views from the Project Site's eastern edge, overlooking the River Properties as well as the Ribbon of Light Bridge and the PARC. The northeast River Balcony would provide stairway access to the Northern Area and a potential connection to the River Properties. At the southeast edge of the Project Site, where the River Balcony is located adjacent to the 7th Street Bridge, the potential exists for future pedestrian/bicycle connections to the River Properties, which the Project would support.

Construction of the Deck outside the Applicant's existing land ownership would require approval by the railroad/transit operating entities to permit Deck construction in air space above the Railway Property directly adjacent to the Project Site. The Project Draft EIR will study options

for expansion of the Deck over the Railway Property, though such expansion can only be accomplished if it is feasible and agreements can be obtained with the owners of the Railway Property and the railroad/transit operating entities. The goal of the Deck includes providing additional outdoor space open to the public with views of and connections to the Los Angeles River and beyond. It would span the length of the Project Site and directly connect the 7th Street Bridge and northern edge of the Project Site, providing a pedestrian connection to the PARC beneath the Ribbon of Light Bridge.

The first required approvals would be from Amtrak and Metro, which own portions of the Railway Property adjacent to and nearest the Project Site. In this scenario, the Deck could span the length of the Project Site and directly connect the 7th Street Bridge and northern River Balcony.

With additional approvals, it could also be possible to add a viewing platform extension from the eastern edge of the Deck across the Railway Property to the Los Angeles River. The viewing platform would be an elevated platform connecting the Project Site to the Los Angeles River as a point of interest and could serve as a means of connection to the future Los Angeles River Bike Path. In addition to approvals from Amtrak, this extension would require approval from Metro and Burlington Northern/Santa Fe Railway. Another option could be to locate the viewing platform extension adjacent to the 7th Street Bridge if such an approach is approved by the City, including the Bureau of Engineering.

A wider Deck, providing more open space, could also provide a connection to a potential future Metro 6th Street Station that would bring a Purple Line extension to the Arts District community at 6th Street as a component of the Deck, with elevator and escalator access to the Station. Again, approvals would be needed, at a minimum, from Amtrak and Metro. For additional widths, approval would also be needed from Burlington Northern/Santa Fe Railway.

Given the scope and potential magnitude of these improvements as a public private partnership to benefit the Arts District community, the EIR for the Project will study the environmental impacts of several Deck options.

In the event it is not feasible to obtain approval for the air rights construction at the Railway Property, the Applicant would make a public benefits contribution for pedestrian-serving improvements in the vicinity of the Ribbon of Light Bridge or PARC, the Project Site, and the Los Angeles River.

G. Anticipated Project Approvals

Discretionary entitlements, reviews, and approvals required for implementation of the Project would include, but not necessarily be limited to, the following:

1. Pursuant to California Government Code Section 65356, Los Angeles Charter Section 555 and LAMC § 11.5.6, a General Plan Amendment to the Central City North Community Plan to change the Community Plan land use designation from Heavy Industrial to Regional Center Commercial and an amendment to the Circulation Element

- of the General Plan (the Mobility Plan 2035) and the Community Plan Land Use Map to re-designate Mesquit Street from a Collector Street to a Local Limited Street. The General Plan Amendment would allow the multi-family residential with affordable housing and hotel which are not permitted in the Heavy Industrial land use designation. The amendment to the Mobility Plan 2035 and Community Plan Land Use Map would better reflect Mesquit Street's function as a Local Limited Street.
2. Pursuant to LAMC §§ 12.32.F and 12.32.Q, a Vesting Zone Change and Height District Change from M3-1-RIO to C2-3-RIO. The zone change from M3 to C2 would allow the multi-family residential with affordable housing and hotel and would correspond to the Regional Center Commercial land use designation. The height district change from Height District 1 to Height District 3 would allow for a FAR of up to 10:1.
 3. Pursuant to LAMC § 11.5.7, a Specific Plan. The Specific Plan could be inclusive of the following:
 - a. Major Development Project Conditional Use Permit,
 - b. Vesting Conditional Use for Floor Area Ratio (FAR) Averaging and Residential Density Transfer in Unified Developments,
 - c. Master Conditional Use for on-site and off-site sale of Alcoholic Beverages,
 - d. Master Conditional Use for Dance Hall(s),
 - e. Vesting Conditional Use Permit for Heliport,
 - f. Special Permission for a Reduction of Off-Street Parking Spaces by the Director,
 - g. Variance to permit a reduction of the amount of on-site parking spaces otherwise required,
 - h. Variance to permit off-site parking to be provided at a property more than 750 feet from the Project Site,
 - i. Variance to permit the siting of bicycle parking spaces at an alternative location,
 - j. Zoning Administrator's Adjustment to permit a zero-foot setback in lieu of any otherwise required setbacks,
 - k. Variation from the street dedication requirements under the Mobility Plan 2035, and
 - l. Applicable provisions from the Greater Downtown Housing Incentive Area such as allowing the area of any land required to be dedicated for street or alley purposes to be included as lot area for purposes of calculating the Project's FAR.

4. Pursuant to LAMC § 12.22.A.25, a request for three affordable housing development incentives for the Project's provision of affordable housing in compliance with Measure JJJ and the City's Density Bonus Law, including the following:
 - a. Averaging FAR, Density, Parking, Open Space, and Vehicular Access;
 - b. FAR increase; and
 - c. An incentive to allow the area of any land required to be dedicated for street or alley purposes to be included as lot area for purposes of calculating the Project's FAR.
5. Pursuant to LAMC §17.03, a Vesting Tentative Tract Map for the merger and re-subdivision, as well as to absorb a portion of Mesquit Street to be vacated, to create ground lots and airspace lots, together with approval of a haul route.
6. Pursuant to Government Code §§ 65864-65869.5, a Development Agreement between the Developer and the City of Los Angeles for 20 years.
7. Other discretionary and ministerial permits and approvals that will or may be required, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

ATTACHMENT B

Explanation of Checklist Determinations

I. Aesthetics

Would the project:

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

Potentially Significant Impact. The Project Site is located within a highly urbanized area southeast of Downtown Los Angeles in the Arts District. Visual resources of merit in the Project vicinity include the Downtown Los Angeles skyline to the northwest, a new multi-modal bridge called the “Ribbon of Light” which is under construction to replace the recently demolished c. 1930s 6th Street Bridge to the northeast, the 7th Street bridge to the southeast, and the Los Angeles River to the east. While the Project would include view corridors toward the River, because the Project would introduce new buildings and increase overall density on the Project Site, it could have an effect on scenic vistas from some locations in the Project vicinity. Therefore, this topic will be analyzed further in the EIR.

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

Potentially Significant Impact. The Project Site is not located within a State- or City-designated scenic highway or associated view corridor.¹ Furthermore, the existing buildings on the Project Site to be removed do not represent historic buildings (see the response to Checklist Question V.a), nor does the site contain trees, rock outcroppings, or other locally recognized desirable aesthetic natural features. However, the Downtown Los Angeles skyline, the 7th Street bridge, and the Los Angeles River may be considered scenic resources and include City-designated historical resources. The introduction of new high-rise buildings may indirectly affect scenic resources in Downtown Los Angeles and the Arts District. Therefore, this topic will be analyzed further in the EIR.

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

Potentially Significant Impact. The Project would replace the existing one- and two-story

¹ City of Los Angeles General Plan Transportation Element, Map E: Scenic Highways in the City of Los Angeles. June 1998. Available at http://cityplanning.lacity.org/cwd/gnlpln/transelt/TEMaps/E_Scnc.gif. Accessed on December 1, 2016.

warehouse and wholesale commercial buildings on the Project Site with high-rise mixed-use development. The buildings would rise to a height of approximately 360 feet (30 stories) above finished grade. As the Project would alter the existing urban visual character of the Project Site and its surroundings by increasing the height and density of on-site development, this topic will be analyzed further in the EIR.

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

Potentially Significant Impact. The Project Site is located within a highly urbanized area southeast of Downtown Los Angeles within the Arts District and along the western edge of the Railway Property, areas characterized by moderate to high ambient nighttime artificial light levels. At night, surrounding development typically generates moderate to high levels of exterior lighting for loading dock, security, parking, signage, and some architectural lighting. Street lights and the limited nighttime traffic on local streets also contribute to the light levels in the area. Some Project light sources, especially vertical elements, given the high-rise nature of the proposed buildings, may be visible from nearby off-site vantages, including existing residential uses south and east of the Project Site. In addition, the Project would introduce new building surface materials to the Project Site with the potential to generate glare. Therefore, this topic will be analyzed further in the EIR.

Shading impacts are influenced by the height and bulk of a building or structure, the time of year, the duration of shading during the day, and the proximity of shade-sensitive land uses or receptors. The Project vicinity is characterized by a number of low- and medium-density hybrid and industrial uses, which are not shade-sensitive receptors. However, there are existing residential uses located in the Project vicinity, including but not limited to a three-story apartment building on the northeast corner of 7th Street and Santa Fe Avenue and a condominium complex across 7th Street from the Project Site to the south. As the Project would increase the height of on-site development, it could have an impact on shade-sensitive residential uses. Therefore, this topic will be analyzed further in the EIR.

II. Agricultural and Forestry Resources

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

Would the project:

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

No Impact. The Project Site is located within the Arts District of Downtown Los Angeles and is currently developed with warehouses and wholesale commercial businesses, including associated office/administrative facilities, loading docks, and surface parking. No agricultural uses or related operations are present on the Project Site or in the surrounding highly urbanized area. Furthermore, the Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.² Since the Project would not convert farmland to non-agricultural uses, there would be no impacts and no mitigation measures are required. No further analysis of this topic is required.

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

No Impact. The Project Site is designated as Heavy Industrial on the Central City North Community Plan General Plan Land Use Map with a corresponding zoning of M3-1-RIO (Heavy Industrial, Height District 1, River Improvement Overlay District). The Project Site comprises a relatively flat parcel developed with warehouses and wholesale commercial buildings.

No agricultural zoning is present in the Project vicinity, and no nearby lands are enrolled under the Williamson Act.³ As such, the Project would not conflict with existing zoning for agricultural uses or a Williamson Act contract, and there would be no impacts and no mitigation measures are required. No further analysis of this topic is required.

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

No Impact. As discussed in the response to Checklist Question II.b, the Project Site is zoned M3-1-RIO. The Project Site is currently occupied by warehouses and wholesale commercial buildings, associated office/administrative facilities, loading docks, and surface parking. Furthermore, consistent with the urbanized area surrounding the Project Site, the larger Project vicinity is zoned for industrial and manufacturing uses, except for the area immediately north and northwest of the Project Site which is zoned for public facilities and the Los Angeles River which

² California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland Map 2014. Available at: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/los14.pdf>. Accessed on December 1, 2016.

³ California Department of Conservation, Division of Land Resource Protection, Los Angeles County Williamson Act Map FY 2015/2016. Available at: ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf. Accessed on December 1, 2016.

is zoned for open space. No forest land or land zoned for timberland production is present on the Project Site or in the surrounding area. As such, the Project would not conflict with existing zoning for forest land or timberland, and there would be no impacts and no mitigation measures are required. No further analysis of this topic is required

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

No Impact. The Project Site consists of developed warehouse and wholesale commercial buildings, and associated office/administrative facilities, loading docks, and surface parking, and no forest land exists in the Project vicinity. As such, the Project would not result in the loss of forest land or conversion of forest land to non-forest use, and there would be no impacts and no mitigation measures are required. No further analysis of this topic is required.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. There are no agricultural uses or related operations on or near the Project Site, which is located southeast of Downtown Los Angeles in the Arts District, a highly urbanized portion of the City. Therefore, the Project would not involve the conversion of farmland to other uses, either directly or indirectly. No impacts to agricultural land or uses would occur and no mitigation measures are required. No further analysis of this topic is required.

III. Air Quality

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The Project Site is located within the 6,600-square-mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD), together with the Southern California Association of Governments (SCAG), is responsible for formulating and implementing air pollution control strategies throughout the Basin. The current Air Quality Management Plan (AQMP) was adopted December 7, 2012 and outlines the air pollution control measures needed to meet Federal particulate matter (PM_{2.5}) standards by 2015 and ozone (O₃) standards by 2024. The 2016 AQMP is currently under review and will contain measures to meet 24-hour PM_{2.5} standards by 2019, annual PM_{2.5} standards by 2025, and 1-hour ozone (O₃) standards by 2022. The AQMP also proposes policies and measures currently contemplated by responsible agencies to achieve Federal standards for healthful air quality in the Basin that are under SCAQMD jurisdiction. In addition, the current AQMP addresses several Federal planning requirements and incorporates updated emissions inventories, ambient measurements,

meteorological data, and air quality modeling tools from earlier AQMPs.

The Project has the potential to increase the amount of traffic in the area, which would consequently generate operational air emissions that could affect implementation of the AQMP. Pollutant emissions resulting from construction of the Project would also have the potential to affect implementation of the AQMP. Therefore, this topic will be analyzed further in the EIR.

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

Potentially Significant Impact. The Project Site is located within the Basin, which is characterized by relatively poor air quality. State and Federal air quality standards are often exceeded in many parts of the Basin, with Los Angeles County among the highest of the counties that comprise the Basin in terms of non-attainment of the standards. The Basin is currently in non-attainment for O₃, particulate matter less than 10 microns in diameter (PM 10)⁴, and for particulate matter less than 2.5 microns in diameter (PM 2.5) on Federal and State air quality standards. The Project would result in increased air emissions associated with construction and operational traffic. Therefore, this topic will be analyzed further in the EIR.

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

Potentially Significant Impact. As discussed in the response to Checklist Question III.b, the Project would result in increased air emissions from construction and operational traffic in the Basin, within an air quality management area currently in non-attainment of Federal and State air quality standards for O₃, PM 10, and PM 2.5. As such, implementation of the Project could potentially contribute to cumulatively significant air quality impacts in combination with other existing and future emission sources in the Project area. Therefore, this topic will be analyzed further in the EIR.

d) Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. The Project Site is located in the downtown area and Arts District of Los Angeles, which includes a mix of uses, including residential and other sensitive uses in the Project vicinity. Existing sensitive uses in the Project vicinity include residential uses, including but not limited to a three-story apartment building on the northeast corner of 7th Street and Santa Fe Avenue and a condominium complex across 7th Street from the Project Site to the south. Construction activities and operation of the Project could increase air emissions above current levels, including potentially toxic air contaminants (TACs), thereby potentially affecting nearby sensitive receptors. Due to the proximity of sensitive receptors, construction TAC impacts

⁴ As noted in the 2012 AQMP, the Basin has met the PM₁₀ standards at all stations and a request for re-designation to attainment status is pending with U.S. Environmental Protection Agency.

would need to be identified through a construction health risk assessment (HRA). Therefore, this topic will be analyzed further in the EIR.

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

Less Than Significant Impact. Any odors generated during construction of the Project would be localized and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by South Coast Air Quality Management District (SCAQMD) Rule 402. The Project would not introduce any major odor-producing uses that would have the potential to affect a substantial number of people. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. Odors are also associated with such uses as sewage treatment facilities and landfills. The Project would not involve these types of uses. Odors associated with Project operation would be limited to those associated with on-site waste generation and disposal (e.g., trash cans, dumpsters) and occasional minor odors generated during food preparation activities. It is anticipated that odor impacts would be less than significant. Existing sensitive uses in the Project vicinity include residential uses, including but not limited to a three-story apartment building on the northeast corner of 7th Street and Santa Fe Avenue and a condominium complex across 7th Street from the Project Site to the south. Therefore, given the proximity of the proposed Project to sensitive uses (residential), a qualitative odors assessment will be conducted in the EIR.

IV. Biological Resources

Would the project:

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

No Impact. The Project Site is located in a highly urbanized area and is currently developed with warehouses and wholesale commercial buildings, associated office/administrative facilities, loading docks, and surface parking. The Project Site does not support habitat for candidate, sensitive, or special status species. No trees are currently present within the Project Site and the adjacent street rights-of-way (ROWs). Thus, the Project would not disturb any native or protected trees as defined by the Los Angeles Municipal Code (LAMC) Section 17.02. Therefore, no impacts to candidate, sensitive, or special status species would occur and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

No Impact. As discussed in the response to Checklist Question IV.a, the Project Site and surrounding area are located in a highly urbanized setting. The Project Site does not contain any drainage channels to the river, riparian habitat, or other sensitive natural communities as indicated in the City or regional plans or in regulations by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). Furthermore, the Project Site is not located in or adjacent to a Significant Ecological Area (SEA) as defined by the City of Los Angeles.^{5,6} Therefore, the Project would not have an adverse effect on any riparian habitat or other sensitive natural community and no mitigation measures are required. No further analysis of this topic is required.

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

No Impact. As discussed in the response to Checklist Question IV.a, the Project Site is located in a highly urbanized area and is developed with warehouses and wholesale commercial buildings, associated office/administrative facilities, loading docks, and surface parking. The surrounding area has been fully developed with urban uses and associated infrastructure, and the Los Angeles River is concrete lined in its nearest stretch to the Project Site (e.g., between the c. 1930s 6th Street Bridge, which was recently demolished, and the 7th Street bridge). The Project Site does not contain any wetlands as defined by Section 404 of the Clean Water Act. Therefore, the Project would not have an adverse effect on federally protected wetlands and no mitigation measures are required. No further analysis of this topic in an EIR is required.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No Impact. As stated in the response to Checklist Question IV.a, the Project Site is currently developed with warehouses and wholesale commercial buildings, associated office/administrative facilities, loading docks, and surface parking. Due to the highly urbanized nature of the Project

⁵ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, at page 2.18-4. Available at: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEI R2.18.pdf. Accessed on December 1, 2016.

⁶ County of Los Angeles, Department of Regional Planning, County of Los Angeles Significant Ecological Areas Program, Figure 9.3, Significant Ecological Areas and Coastal Resources Areas Policy Map, February 2015. Available at: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEI R2.18.pdf. Accessed on December 1, 2016.

Site and surrounding area, the lack of a major water body other than the Los Angeles River (which is concrete lined in its nearest stretch to the Project Site and separated from the Project Site by rail facilities and multiple fence lines), and the lack of trees or natural open space area on the Project Site, the site does not contain substantial habitat for native resident or migratory species, or native nursery sites. Therefore, the Project would not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant. As stated in the response to Checklist Question IV.a, the Project Site is a developed lot with no trees and no natural open space areas, nor do trees or open space areas occur in the adjacent street ROWs. No locally protected biological resources, such as oak trees or California walnut woodlands, or other trees protected under the City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) exist on the Project Site or in the adjacent street ROWs. In accordance with LAMC Section 12.21.G.2, Open Space Requirement for Six or More Residential Units, the Project would be planting one 24-inch box tree for every four dwelling units, ultimately replacing a tree-free site with at least 136 new on-site trees. Furthermore, Project landscaping would comply with all requirements of the LAMC and the City's Urban Forestry Division's requirements. Therefore, the Project would not conflict with local policies or ordinances protecting biological resources such as a tree preservation policy or ordinance, and impacts would be less than significant and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

No Impact. As discussed in the response to Checklist Question IV.a, the Project Site is located within a developed, urbanized area and does not provide habitat for any sensitive biological resources. The Project Site is not located within a habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan.⁷ The Project would not conflict with the provisions of any adopted conservation plan. Therefore, no impacts would occur and no mitigation measures are required. No further analysis of this topic in an EIR is required.

⁷ California Department of Fish and Wildlife, Habitat Conservation Planning, Natural Community Conservation Planning, Summary of Natural Community Conservation Plans (NCCPs) August 2015. Available at: <https://www.wildlife.ca.gov/Conservation/Planning/NCCP/Plans>. Accessed on December 1, 2016.

V. Cultural Resources

Would the project:

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

Potentially Significant Impact. A historical resource is defined in Section 15064.5(a)(3) of the State CEQA Guidelines as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Historical resources are further defined as those associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the California Register, included in a local register, or identified as significant in a historic resource survey are also considered historical resources under CEQA.

The five buildings that currently occupy the Project Site were constructed between 1908 and 2002; several of these buildings are 45 years of age or older and thus have the potential to represent historical resources that could be impacted under the Project. Furthermore, the 7th Street bridge is listed on one or more historical registers and thus represents a historical resource, and the Project would connect to the bridge and could potentially result in direct and/or indirect impacts to this or other historical resources in the area. Therefore, this topic will be further analyzed in the EIR to determine the potential for, and significance of, any impacts on historical resources.

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

Potentially Significant Impact. Section 15064.5(a)(3)(D) of the State CEQA Guidelines generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is currently developed with buildings and surface parking. However, because of the age of some of the on-site improvements (c. 1908 and later), possible lack of associated grading or excavations at the time of construction, and capping of portions of the site with pavement for parking, historical disturbance of the underlying soils may have been minimal and the potential for the existence of extant archaeological resources is unknown. Archaeological resources may be present. Project construction would require grading and excavation activities for building foundations and subterranean parking that could have the potential to disturb existing but undiscovered archaeological resources. Therefore, this topic will be further analyzed in the EIR to determine the potential for, and significance of, any impacts on archaeological resources.

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

Potentially Significant Impact. The Project Site has been subjected to historic development. In addition, no unique geologic features are anticipated to be encountered during Project construction. However, the Project would require grading and excavation for building foundations and subterranean parking that could extend into native soils potentially containing undiscovered paleontological resources. Therefore, this topic will be analyzed further in the EIR to determine the potential for, and significance of, any impacts on paleontological resources.

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

Potentially Significant Impact. As previously indicated, the Project Site has been previously graded and developed. Nonetheless, the Project Site would require excavation that would extend into native soils. Since the potential exists to encounter human remains during excavation activities, this topic will be analyzed further in the EIR to determine the potential for, and significance of, any disturbances of human remains.

VI. Geology and Soils

In 2015, the California Supreme Court in *CBIA v. BAAQMD*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project.

Would the project:

a) Exacerbate existing environmental conditions so as to increase the potential to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Potentially Significant Impact. The seismically active region of Southern California is crossed by numerous active and potentially active faults and is underlain by several blind thrust faults. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those that have shown evidence of movement within the past 11,000 years (i.e., during the Holocene Epoch).

Potentially active faults are those that have shown evidence of movement between 11,000 and 1.6 million years ago (i.e., during the Pleistocene Epoch). Inactive faults are those that have exhibited displacement greater than 1.6 million years before the present (i.e., during the Quaternary Epoch). Blind thrust faults are low angle reverse faults with no surface expression. Due to their buried nature, the existence of blind thrust faults is not usually known until they produce an earthquake.

Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. The CGS has established earthquake fault zones known as Alquist-Priolo Earthquake Fault Zones around the surface traces of active faults to assist cities and counties in planning, zoning, and building regulation functions. These zones identify areas where potential surface rupture along an active fault could prove hazardous and identify where special studies are required to characterize hazards to habitable structures. In addition, the City's General Plan Safety Element has designated fault rupture study areas extending along each side of active and potentially active faults to establish areas of hazard potential due to fault rupture.

The Project Site is not located with an Alquist-Priolo Earthquake Fault Zone and the closest fault is the Puente Hills Blind Thrust, located approximately 1.55 kilometer (0.96 mile) away.⁸ However, since the Project Site is located within the seismically active Southern California region, the Project could expose people or structures to substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. In order to adequately address these conditions, this topic will be analyzed further in the EIR.

ii) Strong seismic ground shaking?

Potentially Significant Impact. The Project Site is located within the seismically active Southern California region. The level of ground shaking that would be experienced at the Project Site from active or potentially active faults or blind thrust faults in the region would be a function of several factors including earthquake magnitude, type of faulting, rupture propagation path, distance from the epicenter, earthquake depth, duration of shaking, site topography, and site geology. Active faults that could produce shaking at the Project Site include the Whittier-Elsinore Fault, San Jacinto Fault, San Andreas Fault, and numerous other smaller faults and blind thrust faults (including the Puente Hills Blind Thrust) found throughout the region. As with any new project development in the State of California, Project building design and construction would be required to conform to the current seismic design provisions of the City's Building Code, which incorporates relevant provisions of the 2016 California Building Code (CBC). The 2016 CBC, as amended by the City's Building Code, incorporates the latest seismic design standards for structural loads and materials to provide for the latest in earthquake safety. Nonetheless, this topic will be analyzed further in the EIR.

iii) Seismic-related ground failure, including liquefaction?

Potentially Significant Impact. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subject to high-intensity ground

⁸ City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS), Parcel Profile Report: 670 Mesquit Street. Generated November 14, 2016.

shaking.

Specifically, liquefaction occurs when the shock waves from an earthquake of sufficient magnitude and duration compact and decrease the volume of the soil; if drainage cannot occur, this reduction in soil volume will increase the pressure exerted on the water contained in the soil, forcing it upward to the ground surface. This process can transform stable soil material into a fluid-like state. This fluid-like state can result in horizontal and vertical movements of soils and building foundations from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Liquefaction occurs when three general conditions exist: 1) shallow groundwater; 2) low density non-cohesive (granular) soils; and 3) high-intensity ground motion.

The CGS has delineated seismic hazard zones in areas where the potential for strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events are likely to occur. Cities and counties must regulate certain development projects within these zones until the geologic and soil conditions of a site are investigated and appropriate mitigation measures, if any, are incorporated into development plans. In addition, the City's General Plan Safety Element has designated areas susceptible to liquefaction. The Project Site is not located in a City-designated liquefaction zone.⁹ However, because of historically high groundwater levels in the vicinity of the Los Angeles River, further analysis will determine the potential for, and significance of, seismic-related ground failure and liquefaction. Therefore, this topic will be analyzed further in the EIR.

iv) Landslides?

No Impact. The Project Site is not located within a City-designated Hillside Grading Area, is not subject to the City's Hillside Ordinance, and is not located in a City-designated Landslide area.¹⁰⁻¹¹ Furthermore, the Project Site is located in an urbanized area on relatively flat land, and is not located in proximity to any mountains or steep slopes. As such, there is no potential for landslides to occur on or near the Project Site. The Project would not expose people or structures to potential substantial adverse effects involving landslides. Therefore, no impacts would result and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

Potentially Significant Impact. During construction, the 5.54-acre Project Site would be subject to ground-disturbing activities (e.g., excavation, grading, soil stockpiling, foundation construction, the installation of utilities). These activities would expose soils for a limited time, allowing for possible erosion. In addition, the change in on-site drainage patterns resulting from the Project could also result in limited soil erosion. Therefore, the potential for soil erosion resulting from Project construction and operation will be analyzed further in the EIR.

⁹ City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS) Parcel Profile Report: 670 Mesquit Street. Generated November 14, 2016.

¹⁰ Ibid.

¹¹ City of Los Angeles General Plan Safety Element, Exhibit C: Landslide Inventory & Hillside Areas. Available at: <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>. Accessed on December 1, 2016.

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

Potentially Significant Impact. As previously discussed in response to Checklist Questions VI.a.iii and a.iv, liquefaction hazards were concluded to be potentially significant and landslide hazards were concluded to have no impact. Subsidence occurs when a void is located or created underneath a surface, causing the surface to collapse. Common causes of subsidence include tunnels or wells (i.e., oil or groundwater) beneath a surface. No oil wells are located on the Project Site.¹² However, an oil well is located several blocks west of the Project Site¹³, and the Project Site is located within relatively close proximity to the Union Station Oils Field to the northwest.¹⁴ Furthermore, historically high groundwater levels have been recorded in the vicinity of the Los Angeles River, and the Project Site is located within a region subject to potentially high seismic ground shaking. Therefore, the potential for lateral spreading, subsidence, liquefaction, and collapse will be evaluated in the EIR.

d) Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project exacerbating the expansive soil conditions?

Potentially Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Because the soils on the Project Site are currently unknown, there is potential for the soils on the Site to be subject to expansion resulting from changes in the moisture content. Therefore, this topic will be further evaluated in the EIR.

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

No Impact. The Project Site is located in an urbanized area where wastewater infrastructure is currently in place. The Project would connect to existing infrastructure and would not use septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur and no mitigation measures are required. No further analysis of this topic in an EIR is required.

¹² City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS) Parcel Profile Report: 670 Mesquit Street. Generated November 14, 2016.

¹³ Ibid.

¹⁴ City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit E–Oil Fields and Oil Drilling Areas in the City of Los Angeles. Available at <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>. Accessed on December 1, 2016.

VII. Greenhouse Gas Emissions

Would the project:

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

Potentially Significant Impact. Construction and operation of the Project would increase greenhouse gas (GHG) emissions that have the potential to either individually or cumulatively result in a significant impact on the environment. In addition, the Project would generate vehicle trips that would contribute to the emission of GHGs. The amount of GHG emissions associated with the Project has not been estimated at this time. Therefore, this topic will be further evaluated in the EIR.

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

Potentially Significant Impact. The Project would be required to comply with the City's Green Building Code pursuant to Chapter IX, Article 9, of the LAMC. In conformance with these requirements, the Project would be designed to reduce GHG emissions through various energy conservation measures. In addition, the Project is required to implement applicable energy conservation measures to reduce GHG emissions such as those described in California Air Resources Board AB 32 Scoping Plan, which describes the approaches California will take to achieve the goal of reducing GHG emissions to 1990 levels by 2020. Furthermore, because the Project would be designed to meet LEED Silver standards or the equivalent, the Project would incorporate sustainable elements of design during construction and operation. However, the GHG emissions associated with the Project have not been estimated at this time. Therefore, this topic will be further evaluated in the EIR.

VIII. Hazards and Hazardous Materials

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

Would the project:

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

Potentially Significant Impact. Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Furthermore, any emissions from the use of such materials would be minimal and localized to the Project Site. Operation of the Project would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, and pesticides for landscaping. The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. As with construction, any emissions from the use of such materials regarding the operation of the Project would be minimal and localized to the Project Site. However, the potential for the presence of hazardous environmental conditions on the Project Site will be analyzed further in the EIR.

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

Potentially Significant Impact. The Project Site is not located within a City-designated Methane Zone.¹⁵⁻¹⁶ Buildings demolished on site may contain hazardous materials, which would require remediation and abatement. Potential soil and water contamination impacts related to the past use of hazardous materials on the Project site may also exist. Accordingly, these topics will be analyzed further in the EIR.

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

Potentially Significant Impact. The closest schools to the Project Site are Los Angeles Unified School District (LAUSD) Metropolitan High School located approximately 0.26 miles to the southeast and LAUSD Para Los Niños Elementary School located approximately 0.40 miles to the east. Both of these schools are located greater than one-quarter mile from the Project Site; however, to be conservative, since construction of the Project includes emissions and potential handling and hauling of hazardous materials, this topic will be analyzed further in the EIR.

¹⁵ City of Los Angeles, Department of Building and Safety Methane and Methane Buffer Zone Map, 2004. Available at:http://cityplanning.lacity.org/eir/WetherlyProject/DEIR/Graphics/Figure%20IV.F-2_LADBS%20Methane%20and%20Methane%20Buffer%20Zone.pdf. Accessed on December 4, 2016.

¹⁶ City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS) Parcel Profile Report: 670 Mesquit Street. Generated November 14, 2016.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, has the potential to exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment?

Potentially Significant Impact. Government Code Section 65962.5, amended in 1992, requires CalEPA to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 makes reference to the preparation of a list, many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions (such as a removal action) or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites (National Priorities List); State Response sites; Voluntary Cleanup sites; and School Cleanup sites. As a Phase I Environmental Site Assessment (ESA) has not yet been conducted for the property, which would determine whether the Project Site appears on any government lists of hazardous materials sites, the potential for the existence of hazardous materials on the Project Site that could pose a risk to the public or the environment is presently unknown. Therefore, this topic will be analyzed further in the EIR.

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

No Impact. The Project Site is not within an airport land use plan and it is not within two miles of a public airport or public use airport. The nearest airport is the Hawthorne Municipal Airport located approximately 10 miles southwest of the Project Site. Therefore, the Project would not result in an airport-related safety hazard for people residing or working in the Project vicinity and no mitigation measures are required. No further analysis of this topic in an EIR is required.

f) For a project within the vicinity of a private airstrip, would the project have the potential to exacerbate current environmental conditions so as to result in a safety hazard for people residing or working in the project area?

No Impact. There are no private airstrips in the vicinity of the Project Site and the Project Site is not located within a designated airport hazard area. Therefore, the Project would not result in airport-related safety hazards for the people residing or working in the area and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

Potentially Significant Impact. The Project Site is located in an established urban area that is well served by the surrounding roadway network. No designated City-designated Selected Disaster Routes border the Project Site – the closest such routes are Santa Fe Avenue located one-half block to the west, the I-10 located approximately 0.38 mile to the south, and the US 101 located approximately 0.37 mile to the east.¹⁷ Therefore, while there is the potential that short-term construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day, it is not anticipated that Project construction activities would affect access on any designated Selected Disaster Routes. Furthermore, most Project construction activities would be confined to the Project Site, the Project would implement traffic control measures (e.g., construction flagmen, signage, etc.) to maintain flow and access, and in accordance with City requirements, and the Project would implement a Construction Management Plan to ensure that impacts on traffic are minimized and adequate emergency access is maintained during construction.

In addition, operation of the Project would generate traffic in the Project vicinity and would result in some modifications to access (i.e., new curb cuts for Project driveways) from the streets that surround the Project Site. However, the Project would be required to provide adequate emergency access and to comply with Los Angeles Fire Department (LAFD) access requirements.

Based on the above, the Project would not be expected to impair implementation or physically interfere with adopted emergency response or emergency evacuation plans. Nonetheless, in order to present a conservative analysis, potential impacts to emergency response and emergency evacuation plans will be further evaluated in the EIR.

h) Exacerbate existing environmental conditions so as to increase the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The Project Site is located in a highly urbanized area. No wildlands are present on the Project Site or surrounding area. Furthermore, the Project Site is not within a City-designated wildfire hazard area and no mitigation measures are required.¹⁸ The Project would not expose people or structures to a significant risk involving wildland fires. No further analysis of this topic in an EIR is required.

¹⁷ City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit H – Critical Facilities & Lifeline Systems. Available at: <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>. Accessed on December 4, 2016.

¹⁸ City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit D – Selected Wildfire Hazard Areas in the City of Los Angeles. Available at: <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>. Accessed December 4, 2016.

IX. Hydrology and Water Quality

Would the project:

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

Potentially Significant Impact. The Project Site is currently developed with warehouses and wholesale commercial buildings, including associated office/administrative facilities, loading docks, and surface parking. The geography of the site and the directions of stormwater runoff from the Project Site are currently unknown and will require a site-specific hydrology study. Construction of the Project would require earthwork activities, including grading and excavation of the Project Site, and the transport of potentially contaminated soils. During precipitation events in particular, construction activities associated with the Project have the potential to result in the conveyance of soils due to minor soil erosion during grading and soil stockpiling and subsequent siltation, as well as other pollutants into municipal storm drains. Construction dewatering may also be necessary due to Project Site's proximity to the Los Angeles River and the depth to historically high groundwater levels, and the potential of encountering groundwater during excavation for the proposed subterranean parking (approximately 47 to 53 feet below ground surface [bgs]) and other excavations (approximately 63 feet bgs). While the Project would be required to implement design features and regulatory mechanisms to avoid significant impacts to water quality standards and waste discharge requirements, water quality impacts will be analyzed further in the EIR to disclose the potential impacts and identify the appropriate mitigation measures that would be necessary to avoid any significant impacts.

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

Less Than Significant Impact. The Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. Water is supplied to the City from four sources, including: (1) 57 percent from the Metropolitan Water District (48 percent from Bay Delta and 8 percent from Colorado River); (2) 29 percent from snowmelt from the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct; (3) 12 percent from local groundwater from the San Fernando groundwater basin; and (4) 2 percent from recycled water.¹⁹ Based on the City's most current Urban Water Management Plan (UWMP), in 2014 and 2015, LADWP had an available water supply of roughly 611,800 acre-feet, with approximately 18 percent coming from local groundwater.²⁰ Groundwater levels in the City are actively maintained via spreading grounds and

¹⁹ Los Angeles Department of Water and Power: Facts and Figures. Available at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=j77lkjqtq_4&_afLoop=357285129360562. Accessed December 5, 2016.

²⁰ Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, Exhibit ES-S – Service Area Reliability Assessment for Average Weather Year, adopted July 1, 2016. Available at:

recharge. Furthermore, the Project does not propose groundwater withdrawal. Lastly, the Project Site is already approximately 100% developed with impervious surfaces, so the development of impervious surfaces under the Project would not be expected to reduce groundwater recharge at the Project Site. Therefore, the impact would be less than significant, and no further evaluation of this topic is required in the EIR.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Potentially Significant Impact. The Project Site is currently developed with warehouses and wholesale commercial buildings, including associated office/administrative facilities, loading docks, and surface parking. The geography of the site and the directions of the stormwater runoff from the Project Site are currently unknown and will require a site-specific hydrology study. Furthermore, construction of the Project could alter the existing drainage pattern of the Project Site, and, if precipitation occurred during construction exposed sediments could be carried off-site and into the local storm drain system, thereby causing siltation. Therefore, this topic will be analyzed further in the EIR.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Potentially Significant Impact. Development of the Project could potentially alter drainage patterns on the Project Site and/or could change the rate and amount of surface runoff in a manner that could cause flooding. Therefore, this topic will be analyzed further in the EIR.

e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Potentially Significant Impact. Development of the Project could potentially contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems and/or provide substantial additional sources of polluted runoff. Therefore, this topic will be analyzed further in the EIR.

f) Otherwise substantially degrade water quality?

Potentially Significant Impact. The Project would be required to implement a Stormwater Pollution Prevention Plan (SWPPP) that includes Best Management Practices to reduce pollutants in stormwater runoff from the Project Site, and also would be required comply with the City's Low Impact Development (LID) Ordinance and Standard Urban Stormwater Mitigation Plan

https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=QOELLADWP005416&RevisionSelecti onMethod=LatestReleased. Accessed December 5, 2016.

(SUSMP) requirements requiring the implementation of good housekeeping practices intended to preclude sediment and hazardous substances from entering stormwater flows. While these are expected to avoid significant impacts to water quality standards and waste discharge requirements, water quality impacts will be analyzed further in the EIR to disclose potential impacts and identify the appropriate design features and regulatory compliance mechanisms necessary to avoid any significant impacts.

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

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

Potentially Significant Impact (g-h). The Project Site is not presently mapped as being within a 100-year flood hazard area,^{21, 22} but updated mapping currently being prepared by the Federal Emergency Management Agency (FEMA) may change this designation. Therefore, this topic will be analyzed further in the EIR.

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

Potentially Significant Impact. The Project Site may be located within a potential inundation area for the Los Angeles River and/or an upstream dam.²³ Therefore, this topic will be evaluated further in the EIR.

j) Inundation by seiche, tsunami, or mudflow?

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

The Project Site is located in an area of relatively flat topography and urban development, with no enclosed bodies of water upstream of the Project Site, and as such, there is no potential for inundation resulting from a seiche or mudflows. Although the Los Angeles River is located approximately 280 feet east of the Project Site, the river in this area is located within a sunken concrete-lined channel at several tens of feet below the ground elevation of the Project Site, and

²¹ City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS) Parcel Profile Report: 670 Mesquit Street. Generated November 14, 2016.

²² Federal Emergency Management Agency, Flood Insurance Rate Map, Map Number 06037C1965F, Effective Date: September 26, 2008. Available at: <https://msc.fema.gov/portal/search?AddressQuery=670%20Mesquit%20St.%2C%20los%20angeles%2C%20ca#searchresultsanchor>

²³ City of Los Angeles General Plan, Safety Element Exhibit G, Inundation & Tsunami Hazard Areas, March 1994. Available at: <http://cityplanning.lacity.org/cwd/gnpln/saftyelt.pdf>. Accessed on December 5, 2016.

any seiches that could potentially develop within this stretch of the river during an earthquake would not have the potential to inundate the Project Site. Relative to tsunami hazards, the Project Site is located approximately 16 miles inland (northeast) from the Pacific Ocean, and therefore, would not be subject to a tsunami. Furthermore, the Project Site is not located on a City-designated tsunami hazard area.²⁴ Therefore, no impacts would occur due to inundation by tsunami or mudflow. No further analysis of this topic is required.

X. Land Use and Land Use Planning

Would the project:

a) Physically divide an established community?

Potentially Significant Impact. The Project Site is located within the Central City North Community Plan area in the City of Los Angeles, is already fully developed, and is within a fully urbanized area. While the Project would increase the density of development at the Project Site (going from an FAR of approximately 0.9:1 to 7.5:1), the Project would increase rather than decrease vehicular and pedestrian access through the Project Site by providing vehicle access through a connection to the 7th Street bridge, providing several east-west pedestrian connections from Mesquit Street to the eastern side of the Project Site, and include a pedestrian deck along the east side of the Project over the Railway Property that would connect to the future Ribbon of Light Bridge (the replacement of the old 6th Street bridge) and the 12-acre Sixth Street Park, Arts, River, and Connectivity Improvements (PARC) to be located under and adjacent to the Ribbon of Light Bridge. Furthermore, while the Project would include the proposed vacation of a portion of Mesquit Street, Mesquit Street does not currently connect to 7th Street, and therefore no adverse change in vehicle access to or circulation within would occur as the result of this vacation. However, because the Project seeks the proposed vacation of a portion of Mesquit Street, it is recommended that physically dividing an established community be evaluated in the EIR.

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

Potentially Significant Impact. The Project Site is located within the Central City North Community Plan Area, which designates the Project Site for Heavy Manufacturing/Industrial land uses. This land use designation corresponds with the zoning designation of M3-1-RIO (Heavy Industrial, Height District 1, River Improvement Overlay District). The Project Site is also located within the East Los Angeles State Enterprise Zone. The Project would replace the existing on-site low-rise cold storage and associated office, loading dock and parking uses with high-rise mixed use development including residential, office, hotel, restaurant, retail (including grocery and farmer's market, studio/event/gallery and a potential museum, a gym, and structured parking uses.

²⁴ See footnote 23.

The entitlements being requested for the Project include, but may not be limited to, the following:

1. General Plan Amendment to the Central City North Community Plan to change the Community Plan land use designation from Heavy Industrial to Regional Center Commercial, and to change the Circulation Element of the General Plan (the Mobility Plan 2035) and the Community Plan Land Use Map to redesignate Mesquit Street from a Collector Street to a Local Limited Street.
2. Vesting Zone Change and Height District Change from M3-1-RIO to C2-3-RIO.
3. Specific Plan which could be inclusive of the following:
 - Major Development Project Conditional Use Permit,
 - Vesting Conditional Use for Floor Area Ratio (FAR) Averaging and Residential Density Transfer in Unified Developments,
 - Master Conditional Use for on-site and off-site sale of Alcoholic Beverages,
 - Master Conditional Use for Dance Hall(s),
 - Vesting Conditional Use Permit for Heliport,
 - Special Permission for a Reduction of Off-Street Parking Spaces by the Director,
 - Variance to permit a reduction of the amount of on-site parking spaces otherwise required,
 - Variance to permit off-site parking to be provided at a property more than 750 feet from the Project Site,
 - Variance to permit the siting of bicycle parking spaces at an alternative location,
 - Zoning Administrator's Adjustment to permit a zero-foot setback in lieu of any otherwise required setbacks,
 - Variation from the street dedication requirements under the Mobility Plan 2035, and
 - Applicable provisions from the Greater Downtown Housing Incentive Area such as allowing the area of any land required to be dedicated for street or alley purposes to be included as lot area for purposes of calculating the Project's FAR.
4. Three affordable housing incentives through the City's Density Bonus Law: Averaging FAR, Density, Parking, Open Space, and Vehicular Access; FAR increase; and an incentive to allow the area of any land required to be dedicated for street or alley purposes to be included as lot area for purposes of calculating the Project's FAR.
5. Vesting Tentative Tract Map for the merger and re-subdivision, as well as absorb a portion of Mesquit Street to be vacated, to create ground lots of airspace lots, together with approval of a haul route.
6. Development Agreement (20 yr.).
7. Other discretionary and ministerial permits and approvals that will or may be required.

An evaluation of the land use effects of the Project's requested entitlements, and of Project consistency with applicable local and regional land use plans, policies, and regulations, is required in the EIR.

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

No Impact. As discussed in the responses to Checklist Question IV, Biological Resources, the Project Site is located in an urbanized area and is developed with warehouse, wholesale commercial, and associated office, loading dock and parking uses. Although the channelized Los Angeles River is located approximately 280 feet east of the Project Site, the Project Site is devoid of trees, vegetation and natural habitat, and thus does not support sensitive natural communities.

Furthermore, the Project Site is not located within or adjacent to a Significant Ecological Area (SEA) as defined by the City of Los Angeles.^{25,26} The Project Site is not located within a habitat conservation plan or natural community conservation plan. Therefore, the Project would not conflict with the provisions of any adopted applicable conservation plan. No mitigation measures are required and no further analysis of this topic in an EIR is required.

XI. Mineral Resources

Would the project:

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

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

No Impact (a-b). According to the Conservation Element of the City of Los Angeles General Plan, the Project Site, along with most of the Arts District and other areas of the City along the Los Angeles River, are located within a Mineral Resource Zone (MRZ).²⁷ However, the Project Site and its environs are not designated as an existing Aggregate Production Area by the State of California or the U.S. Geological Survey.²⁸ Also, the Project Site is fully developed with urban uses and has not been the site of mineral resource extraction in the past, and rather than being designated for resource extraction, the Project Site is designated for Heavy Manufacturing/Industrial use by the City of Los Angeles General Plan. Therefore, Project implementation would

²⁵ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, at page 2.18-13. Available at: <http://cityplanning.lacity.org/housinginitiatives/housingelement/frameworkeir/FrameworkFEIR.pdf>. Accessed on December 1, 2016.

²⁶ County of Los Angeles, Department of Regional Planning, County of Los Angeles Significant Ecological Areas Program, Figure 9.3, Significant Ecological Areas and Coastal Resources Areas Policy Map, February 2015. Available at: http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf. Accessed on December 1, 2016.

²⁷ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Figure GS-1 – Areas Containing Significant Mineral Deposits in the City of Los Angeles. Available at: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEI R2.17_p1-35.pdf. Accessed on December 5, 2016.

²⁸ California Geological Survey, Aggregate Sustainability in California, California, 2012. Available at: http://www.conservation.ca.gov/cgs/information/publications/ms/Documents/MS_52_2012.pdf. Accessed on December 5, 2016.

not result in the loss of availability of a known mineral resource of value to the region and residents of the State, nor of a locally important mineral resource recovery site. No impacts to mineral resources would occur and no mitigation measures are required. Further analysis of Mineral Resources is not required.

XII. Noise

Would the project result in:

a) Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. Construction of the Project would require the use of heavy construction equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) that would generate noise on a short-term basis. Additionally, operation of the Project may increase existing noise levels as a result of Project-related traffic, the operation of heating, ventilation, and air conditioning (HVAC) systems, vehicles in the surface and subsurface parking levels, loading and unloading of trucks, and resident and visitor activities on the Project Site. The Project may also include occasional special events which could generate noise. As such, nearby noise-sensitive uses, such as residential uses and schools, could potentially be affected. Lastly, the Project proposes a rooftop heliport for emergency and occasional use, which may potentially expose off-site sensitive receptors to heliport noise. Therefore, the Project's potential to expose sensitive receptors to noise levels in excess of applicable standards will be analyzed further in the EIR.

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

Potentially Significant Impact. Construction of the Project may generate groundborne vibration and noise due to site grading, clearing activities, and haul truck travel. In addition, Project construction may require pile-driving. As such, the Project would have the potential to generate or to expose people to excessive groundborne vibration and noise levels during short-term construction activities. In addition to the potential to expose people to groundborne vibration, there is the potential for the Project to generate construction-related vibration that may impact adjacent historical resources. Therefore, this topic will be analyzed further in the EIR.

Once construction is complete, Project operation (e.g., residential, office, hotel, restaurant, retail [including grocery and farmer's market], studio/event/ gallery and a potential museum, a gym, and structured parking) would not generate excessive groundborne vibration or groundborne noise. As such, Project operation would not generate groundborne vibration or groundborne noise at levels beyond those which currently exist in an urbanized setting and would not have the potential to expose people to excessive groundborne vibration or groundborne noise, resulting in a less than significant impact. Therefore, no mitigation measures would be required and no further analysis of operational groundborne vibration or groundborne noise is required.

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

Potentially Significant Impact. As discussed in the response to Checklist Question XII.a, Project operation may increase existing noise levels as a result of Project-related traffic, the operation of HVAC systems, loading and unloading of trucks, the use of ground level and subsurface parking, and the presence of residents and visitors at the Project Site. Therefore, potential impacts associated with a permanent increase in ambient noise levels will be analyzed further in the EIR.

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

Potentially Significant Impact. As discussed in the response to Checklist Question XII.a, Project construction would require the use of heavy construction equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) that would generate noise on a short-term basis. Therefore, potential impacts associated with a temporary or periodic increase in ambient noise levels will be further analyzed in the EIR.

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

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

No Impact (e-f). As discussed in the response to Checklist Question VIII.e, the Project Site is not located within an airport land use plan, within two miles of a public use airport, or within the vicinity of a private airstrip. The nearest airport is the Hawthorne Municipal Airport located approximately 10 miles southwest of the Project Site. Therefore, the Project would not expose site population in the Project vicinity to excessive noise levels from airport use and no mitigation measures are required. No further analysis of this topic in an EIR is required.

XIII. Population and Housing

Would the project:

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

Potentially Significant Impact. The Project Site is located within the jurisdiction of the Southern California Association of Governments (SCAG), a Joint Powers Agency established under California Government Code Section 6502 et seq. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation

programs, air quality, housing, and economic development. In April 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). The 2016 RTP/SCS presents the transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing the region's transportation and related challenges. It also includes projections of population, households, and employment through 2040. Furthermore, the City's General Plan including its community plans address growth in the region.

The proposed Project would cause an increase in population, construct new residential units, and create new employment opportunities. Due to the Project's projected population, housing, and employment increase, and the displacement of the approximately 22 persons currently employed at the site, a detailed analysis will be undertaken as part of the EIR that compares the Project's contributions to population, housing, and employment growth in SCAG's 2016 RTP/SCS, the Central City North Community Plan and Citywide projections and policies regarding future development.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact (b-c). No dwelling units are currently located on the Project Site. Thus, the Project would not result in the demolition of existing housing units. The Project would replace the existing warehouse and wholesale commercial uses with a mixed-use project including residential, office, hotel, restaurant, retail (including grocery and farmer's market), studio/event/gallery, a potential museum, a gym, and structured parking uses. Since no existing housing would be displaced, there would be no necessity for the construction of replacement housing elsewhere and no mitigation measures are required. As no impacts would occur, further analysis of this topic in the EIR is not required.

XIV. Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

a) Fire protection?

Potentially Significant Impact. The LAFD provides fire protection and emergency medical services in the City of Los Angeles. Four fire stations are located in the vicinity of the Project Site, including: Fire Station No. 17 at 1601 S. Santa Fe Avenue (approximately 0.64 miles south of the Project Site); Fire Station No. 4 at 450 E. Temple Street (approximately 0.91 mile northwest of the Project Site); Fire Station No. 9 at 430 E. 7th Street (approximately 1.10 miles

northwest of the Project Site); and Fire Station No. 3 at 108 N. Fremont Avenue (approximately 1.94 miles northwest of the Project Site).²⁹ Fire Station No. 17 is the first-in station to calls for service at the Project Site.³⁰

Because the Project would increase the developed floor area and height of buildings on the Project Site, and increase the population on the Project Site, it could increase demand on LAFD fire protection and emergency medical services and potentially affect emergency response times in the Project area. Therefore, this topic will be further evaluated in the EIR.

b) Police protection?

Potentially Significant Impact. The Los Angeles Police Department (LAPD) provides police protection services in the City of Los Angeles. The LAPD is divided into four Police Station Bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. Each of the Bureaus encompasses several communities. The Project Site is located in LAPD's Central Bureau, which serves the Downtown business district, as well as the communities of Eagle Rock, the Garment District, MacArthur Park, Dodger Stadium, Chinatown, Little Tokyo, Griffith Park, and the Toy District.³¹

Specifically, the Project Site is served by the Central Area Community Police Station located at 251 E. 6th Street (approximately 1.12 miles northwest of the Project Site). Because the Project would introduce new structures, residents, visitors, and employees to the Project Site, greater demand on LAPD police protection services could be generated. Therefore, potential impacts associated with police protection services will be analyzed further in the EIR.

c) Schools?

Potentially Significant Impact. The Project Site is located within the jurisdiction of the Los Angeles Unified School District (LAUSD), and specifically within LAUSD's East Local District.³² The Project Site is within the attendance boundaries of 9th Elementary School, Hollenbeck Middle School, and Metropolitan Continuation High School, and within a LAUSD Zone of Choice with multiple high school options. Because the Project would introduce a new resident population and employees to the Project Site, a greater demand on LAUSD schools would be generated. Therefore, potential impacts to local schools will be analyzed further in the EIR.

d) Parks?

Potentially Significant Impact. The City of Los Angeles Department of Recreation and Parks

²⁹ Los Angeles Fire Department, Find Your Station, <http://www.lafd.org/fire-stations/find-your-station> and Google Earth Pro. Accessed December 5, 2016.

³⁰ Los Angeles Fire Department, FireStateLA, <http://www.lafd.org/fsla/stations-map?st=396&address=670%20Mesquit%20St&year=2016>. Accessed December 5, 2016.

³¹ Los Angeles Police Department. About Central Bureau. Available at: http://www.lapdonline.org/central_bureau/content_basic_view/1908. Accessed December 5, 2016.

³² LAUSD. Local District East Map, June 2015. Available at: <http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/Domain/33/East.pdf>. Accessed on December 5, 2016.

provides park facilities and services within the City of Los Angeles. Because the Project would introduce new residents, employees, hotel guests, and visitors to the Project Site who might visit nearby City parks, greater demand on existing City parks could be generated. While the Project would include open space areas (Entry Plazas, Northern Landscaped Pedestrian Connection, pedestrian Deck, River Balconies, rooftop gardens, etc.), a gym, and other recreational amenities, such as terraced walkways and rooftop decks, which would reduce the Project's demand for parks, demand on City parks could increase. Therefore, potential impacts to parks will be analyzed further in the EIR.

e) Other public facilities?

Potentially Significant Impact. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles. Because the Project would introduce new residents, employees, hotel guests, and visitors to the Project Site, demand on LAPL library services could increase. Therefore, potential impacts associated with library services will be analyzed further in the EIR.

During construction and operation of the Project, other governmental services, including roads, would continue to be utilized. Project residents, employees, hotel visitors and guests would use the existing road network, without the need for new roadways to serve the Project Site. As discussed in Checklist Question XVI, Transportation/Traffic, the Project could result in an increase in the number of vehicle trips attributable to the Project Site. However, the additional use of roadways would not be excessive and would not necessitate the upkeep of such facilities beyond normal requirements. Therefore, the Project would result in less than significant impacts on other governmental services besides LAPL library services and no mitigation measures would be required. Further analysis of other governmental services is not required.

XV. Recreation

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

Potentially Significant Impact. As discussed in the response to Checklist Question XIV.d, because the Project would introduce new population to the Project Site, greater demand on existing public recreational and park facilities and services could be generated. Therefore, this topic will be analyzed further in the EIR.

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

Potentially Significant Impact. The Project would include the development of on-site open space and recreational amenities (see the response to Checklist Question XIV.d), and could potentially require the development and/or expansion of existing off-site parks and open space/recreational amenities. The construction of such amenities could potentially result in

adverse physical effects on the environment. Therefore, this topic will be analyzed further in the EIR.

XVI. Transportation/Traffic

Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Potentially Significant Impact. The Project Site is subject to the Los Angeles Department of Transportation (LADOT) standards and guidelines regarding trip generation and levels of service (LOS) for the street system. The Project would develop the Project Site with 308 residential units and approximately 1,484,196 sf of office, hotel, restaurant, retail (including grocery and farmer's market), studio/event/gallery and a potential museum, a gym, and structured parking. These uses would add traffic to local and regional transportation systems. Thus, operation of the Project could adversely affect the existing capacity of the street system or exceed an established LOS standard. Project construction would also result in a temporary increase in traffic due to construction-related truck trips and worker vehicle trips. Therefore, traffic impacts during construction could also adversely affect the street system. As the Project has the potential to result in a significant traffic impact, this topic, including mass transit and non-motorized travel, will be analyzed further in the EIR.

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

Potentially Significant Impact. The Congestion Management Program (CMP) is a State-mandated program enacted by the State legislature to address the impacts that urban congestion has on local communities and the region as a whole. Metro is the local agency responsible for implementing the requirements of the CMP. New projects located in the City of Los Angeles must comply with the requirements set forth in the Metro's CMP. These requirements include the provision that all freeway segments where a project could add 150 or more trips in each direction during the peak hours be evaluated. The guidelines also require evaluation of all designated CMP intersections where a project could add 50 or more trips during either peak hour. The Project would generate vehicle trips, which could potentially add trips to a freeway segment or CMP intersection. Thus, this topic will be analyzed further in the EIR.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Potentially Significant Impact. A rooftop heliport is proposed for emergency and occasional use incidental to residential and office uses. As discussed in the response to Checklist Question VIII.e, the nearest airport or heliport is the Hawthorne Municipal Airport, approximately 10 miles southwest of the Project Site. The Project could potentially result in a change in air traffic patterns, including increases in traffic levels or changes in location that would result in substantial safety risks. Thus, this topic will be analyzed further in the EIR.

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

Potentially Significant Impact. Project construction may require temporary lane or sidewalk closures, access on and near the Project Site could also be temporarily disrupted resulting in conflicts with vehicles, pedestrians and/or bicyclists. Also, Project operation would alter the way vehicles ingress and egress the Project Site, including through a new connection to the 7th Street bridge, increase trip generation and driveway use compared to existing on-site uses, increase traffic on local streets, and include vacation of a portion of Mesquit Street which could change the circulation pattern immediately adjacent to the Project Site. Considering these factors, the potential for hazardous conditions during Project construction and operation may increase over existing conditions. Therefore, further analysis of this topic in the EIR is required.

e) Result in inadequate emergency access?

Potentially Significant Impact. Immediate vehicular access to the Project Site is provided by Mesquit Street and Jesse Street. While it is expected that the majority of construction activities for the Project would be confined on-site, short-term construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. In addition, the Project would generate traffic in the Project vicinity and would modify Project Site access from streets that surround the Project Site. Thus, this topic will be analyzed further in the EIR.

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

Potentially Significant Impact. The closest Metro bus stop to the Project Site is located at the southwest corner of 7th Street and S. Santa Fe Avenue, approximately 235 feet southwest of the Project Site, and serves Metro Lines 18, 60 and 62. The closest Metro light rail stations are the Little Tokyo/Arts District Gold Line Station located approximately 1.0 mile northwest of the Project Site, Union Station located approximately 1.23 miles to the northwest of the Project Site, and the Washington Blue Line Station located approximately 1.32 miles southwest of the Project Site. Both lines provide service between Downtown Los Angeles and Long Beach and provide connections to the 7th Street Metro Center in Downtown Los Angeles and the Metro Blue, Expo,

Purple, and Red Lines and various bus lines. In addition, Metro is studying the viability of an extension of its Red or Purple Line light rail systems into the Arts District from the west, with stations under consideration at 3rd Street and 6th Street.^{33,34}

Furthermore, within the Project Vicinity, the City's 2010 Bicycle Plan designates 6th and 7th Streets as Bicycle Lanes and Santa Fe Avenue as a Bicycle-Friendly Street.³⁵ The 2010 Bicycle Plan also identified both 6th Street and 7th Street as part of the Backbone Bikeway Network.

The Project would improve the pedestrian experience through the provision of public plazas and paseos, and is not expected to interfere with or degrade the performance or safety of public transit, bicycle, or pedestrian facilities. Nonetheless, the Project's consistency with policies, plans, and programs supporting alternative transportation will be analyzed further in the EIR.

XVII. Tribal Cultural Resources

Would the project:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

b) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public

³³ Los Angeles County Metropolitan Transportation Authority (Metro), System Safety, Security and Operations Committee, Downtown Los Angeles Arts District Connectivity Board Report, April 19 and 20, 2017. Available at <http://thesource.metro.net/2017/04/17/latest-metro-staff-report-on-issues-involving-an-arts-district-metro-rail-station/>. Accessed April 19, 2017.

³⁴ Los Angeles County Metropolitan Transportation Authority (Metro), System Safety, Security and Operations Committee, Downtown Los Angeles Arts District Connectivity Board Report, January 19, 2017. Available at: <https://metro.legistar.com/LegislationDetail.aspx?ID=2938269&GUID=681E0C6A-0CA0-4806-A037-21BCFF25B994>. Accessed March 30, 2017.

³⁵ Los Angeles Department of City Planning, 2010 Bicycle Plan, Exhibit D: 2010 Bicycle Plan Designated Bikeways. Available at: <http://planning.lacity.org/cwd/gnpln/transelt/NewBikePlan/Txt/LA%20CITY%20BICYCLE%20PLAN.pdf>. Accessed on December 5, 2016.

Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Potentially Significant Impact (a-b). Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Any information gained during the consultation process will be used to analyze impacts to tribal cultural resources in the EIR. Formal consultation with the Gabrieleño Band of Mission Indians took place on March 23rd, 2017. As consultation regarding Tribal Cultural Resources is ongoing, this topic will be analyzed further in the EIR.

XVIII. Utilities and Service Systems

Would the project:

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

Potentially Significant Impact. The City Department of Public Works (LADPW) provides wastewater services for the Project Site. Any wastewater generated at the Project Site is treated at the Hyperion Treatment Plant (HTP). The HTP is a part of the Hyperion Treatment System, which also includes the Tillman Water Reclamation Plant (TWRP) and the Los Angeles-Glendale Water Reclamation Plant (LAGWRP). The HTP is designed to treat 450 million gallons per day (mgd). HTP has an average dry water flow of approximately 362 mgd, leaving approximately 88 mgd of capacity available.³⁶⁻³⁷ The discharge of effluent from the HTP into Santa Monica Bay is regulated by the HTP's NPDES Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board (RWQCB)'s requirements for a recreational beneficial use. The Project would result in new sources of wastewater generated at the Project Site with the development of the new residential and other uses along with related amenities and open space. The incremental increase in the quantity of wastewater generated by the Project could potentially result in impacts with respect to wastewater treatment. Therefore, this topic will be analyzed further in the EIR.

³⁶ The HTP is an end-of-the-line plant, subject to diurnal and seasonal flow variation. It was designed to provide full secondary treatment for a maximum-month flow of 450 mgd, which corresponds to an average daily waste flow of 413 mgd, and peak wastewater flow of 850 mgd. (Information regarding peak flow is included in the City of Los Angeles Department of Public Works, Bureau of Sanitation, Water Integrated Resources Plan (IRP), , Volume 1, Wastewater Management, 2006; page 7-3.)

³⁷ City of Los Angeles Department of Public Works, Bureau of Sanitation website, Hyperion Water Reclamation Plant. Available at: https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=modqzbl8f_4&_afLoop=33199812189076655. Accessed December 5, 2016.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Potentially Significant Impact. Water and wastewater systems consist of two components, the source of the water supply or place of sewage treatment, and the conveyance systems (i.e., distribution lines and mains) that link these facilities to Project Site. Given the Project's proposed increase in developed floor area on the Project Site, this topic will be analyzed further in the EIR.

c) Require or result in the construction of new storm water drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects?

Potentially Significant Impact. Under existing conditions, the Project Site is developed with warehouse, wholesale commercial, and associated uses including office, loading docks, and surface parking. Current drainage flows on the Project Site are unknown and will be determined in a site-specific hydrology study. Project implementation would require grading, could result in alterations to the drainage pattern at the Project Site, and would require verification of available capacity in the municipal storm drain system. Therefore, this topic will be evaluated in the EIR.

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

Potentially Significant Impact. Given the increased development that would occur on the Project Site, the Project would increase water demand beyond existing conditions. Sections 10910-10915 of the State Water Code (Senate Bill [SB] 610) requires the preparation of a water supply assessment (WSA) demonstrating sufficient water supplies for a project that is: 1) a shopping center or business establishment that will employ more than 1,000 persons or have more than 500,000 sf of floor space; 2) a commercial office building that will employ more than 1,000 persons or have more than 250,000 sf of space, or 3) any mixed-use project that would demand an amount of water equal to or greater than the amount of water needed to serve a 500-dwelling unit subdivision. A WSA will be required for the Project as it is anticipated that the Project would result in a net increase in water use that is greater than the amount of water needed to serve a 500 unit residential development. This topic will be further analyzed in the EIR in order to assess projected water demand and the sufficiency of current water supplies.

e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Potentially Significant Impact. Given the increase in developed floor area proposed on the Project Site, the Project would result in an increase in wastewater generation compared to existing conditions. Therefore, this topic will be evaluated in the EIR.

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

Potentially Significant Impact. Solid waste management in the City of Los Angeles involves both public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. The Los Angeles Bureau of Sanitation (BOS) is responsible for developing strategies to manage solid waste generation and disposal in the City of Los Angeles. The BOS collects solid waste generated primarily by single-family dwellings, small multi-family dwellings, and public facilities. Private hauling companies collect solid waste generated primarily from large multi-family residential, commercial, and industrial properties. The City does not own or operate any landfill facilities, and the majority of its solid waste is disposed of at in-County landfills.

The Project would demolish existing buildings totaling approximately 205,393 sf plus hardscape, which would generate demolition debris, and would generate approximately 407,000 cy of dirt for export and construct new buildings totaling approximately 1,792,103 sf of floor area, which would generate construction debris. Proposed uses include approximately 308 residential units, approximately 236 hotel rooms, and a range of office and commercial uses, which would generate solid waste from future Project operations. Disposal would occur pursuant to City Ordinances that require the use certified haulers and implementation of practices to recycle exported materials. As the Project may have impacts on the remaining landfill capacity that is monitored in the state-mandated Countywide Integrated Waste Management Plan (CoIWMP) Annual Reports, and would be required to demonstrate consistency with policies to divert waste from landfills and increase waste recycling. Therefore, this topic will be evaluated in the EIR.

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

Potentially Significant Impact. As described in the response to Checklist Question XVIII.f, there are a number of state, county and city plans and policies that address the availability of sufficient landfill capacity and the diversion/recycling of waste debris. Therefore, the Project's waste generation and consistency with plans and policies to increase diversion of waste will be evaluated in the EIR.

XVIX. Mandatory Findings of Significance

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact. The Project would not substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten

to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. Also, the Project would not eliminate important examples of the major periods of California history or prehistory.

However, as discussed in this Initial Study, the Project could result in environmental impacts that have the potential to degrade the quality of the environment as addressed herein. Potentially affected resources include Aesthetics (Aesthetics, Views, Light and Glare, and Shade and Shadow), Air Quality, Cultural Resources (Archaeological, Paleontological, and Historical Resources), Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services (Fire, Police, Schools, Parks, and Libraries), Transportation/Circulation (Traffic and Access), Tribal Cultural Resources, and Utilities (Water, Wastewater, and Solid Waste). An EIR will be prepared to analyze and document these potentially significant impacts.

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

Potentially Significant Impact. The potential for cumulative impacts occurs when the independent impacts of a given Project are combined with the impacts of related projects in proximity to the Project Site, to create impacts that are greater than those of the Project alone. Related projects include past, current, and/or probable future projects whose development could contribute to potentially significant cumulative impacts in conjunction with a given project.

Each of the topics determined to have the potential for significant impacts in this Initial Study will be subject to further evaluation in the EIR, including evaluation of the potential for cumulatively significant impacts.

With respect to potential contributions to cumulative impacts for agricultural resources, biological resources, and mineral resources, the Project Site is located in an urbanized area, and like the Project, other development occurring in the area would also constitute urban infill in already densely developed areas. Also, the Project Site does not contain agricultural, sensitive biological, or mineral resources, and therefore Project implementation would not be expected to result in a considerable contribution to cumulatively significant impacts on these resources.

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

Potentially Significant Impact. As discussed in this Initial Study, the Project could result in potentially significant environmental impacts associated with Aesthetics (Aesthetics, Views, Light and Glare, and Shade and Shadow), Air Quality, Cultural Resources (Archaeological, Paleontological, and Historical Resources), Geology and Soils, Greenhouse Gas Emissions,

Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services (Fire, Police, Schools, Parks, and Libraries), Transportation/ Circulation (Traffic and Access), Tribal Cultural Resources, and Utilities (Water, Wastewater and Solid Waste). These impacts could have potentially adverse effects on human beings. Therefore, further analysis of these impacts is required in the EIR.

A-3 Scoping Meeting Materials

EIR SCOPING MEETING

670 Mesquit

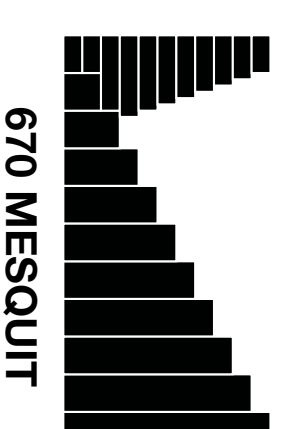
Art Share L.A.

801 East 4th Place

Los Angeles, CA 90013

Monday, May 8, 2017

5:00 p.m. – 7:00 p.m.



670 MESQUIT

EIR SCOPING MEETING

670 Mesquit

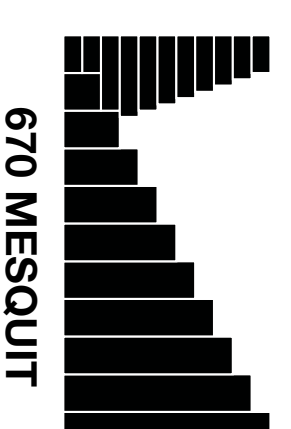
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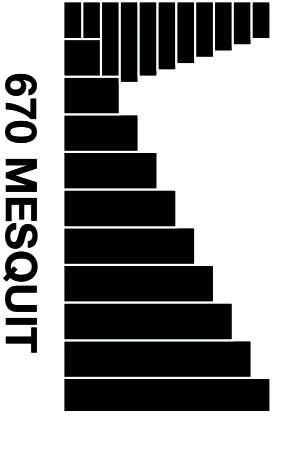
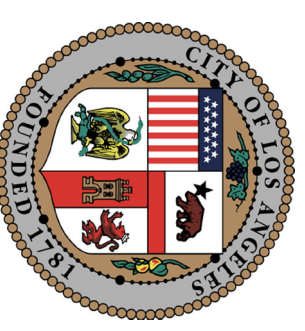


670 MESQUIT

SCOPING MEETING OBJECTIVES

- **Provide information about 670 Mesquit**
- **Provide information on Environmental Impact Report (EIR) process and timeline**
- **Identify environmental issues for analysis in the EIR**
- **Solicit community input regarding environmental issues of concern to be analyzed in the EIR**
- **Determine scope and content of the EIR**

* The intent of the Scoping Meeting is to receive information that helps determine the scope and content of the EIR. The City is at the beginning of the environmental review process and has not yet analyzed all of the potential impacts of the project.



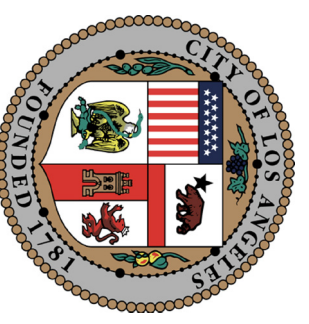
670 MESQUIT

PROJECT OVERVIEW

- **Total Development: approximately 1,800,000 sf**
- **Development Site: approximately 5.45 acres**
- **Floor Area Ratio: up to 10:1**
- **Creative Office Space: approximately 945,000 sf**
- **Multi-family Residential: approximately 308 units, 16% affordable units in compliance with Measure JJJ and AB 1934**
- **Hotel: approximately 236 rooms**
- **Retail (including grocery and farmer's market): approximately 137,000 sf**
- **Restaurant: approximately 90,000 sf**
- **Studio/Event/Gallery/Museum: approximately 94,000 sf**
- **Gym: approximately 63,000 sf**
- **Equivalency Program to allow the composition of on-site development to be modified to respond to future needs in a manner that does not increase the Project's impacts on the environment.**

PARKING

- **Four levels of below-grade parking**
- **At- and above-grade parking within Buildings 3, 4, and 5**
- **Approximately 2,000 parking spaces and 930 bicycle parking spaces**



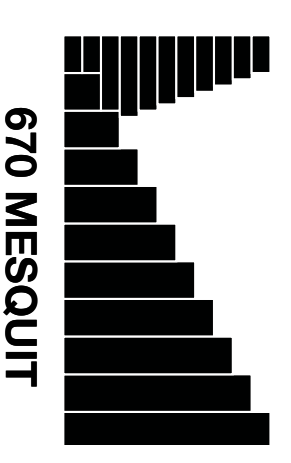
OPEN SPACE AND PEDESTRIAN DECK

OPEN SPACE

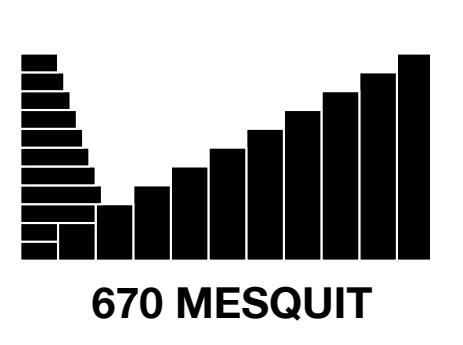
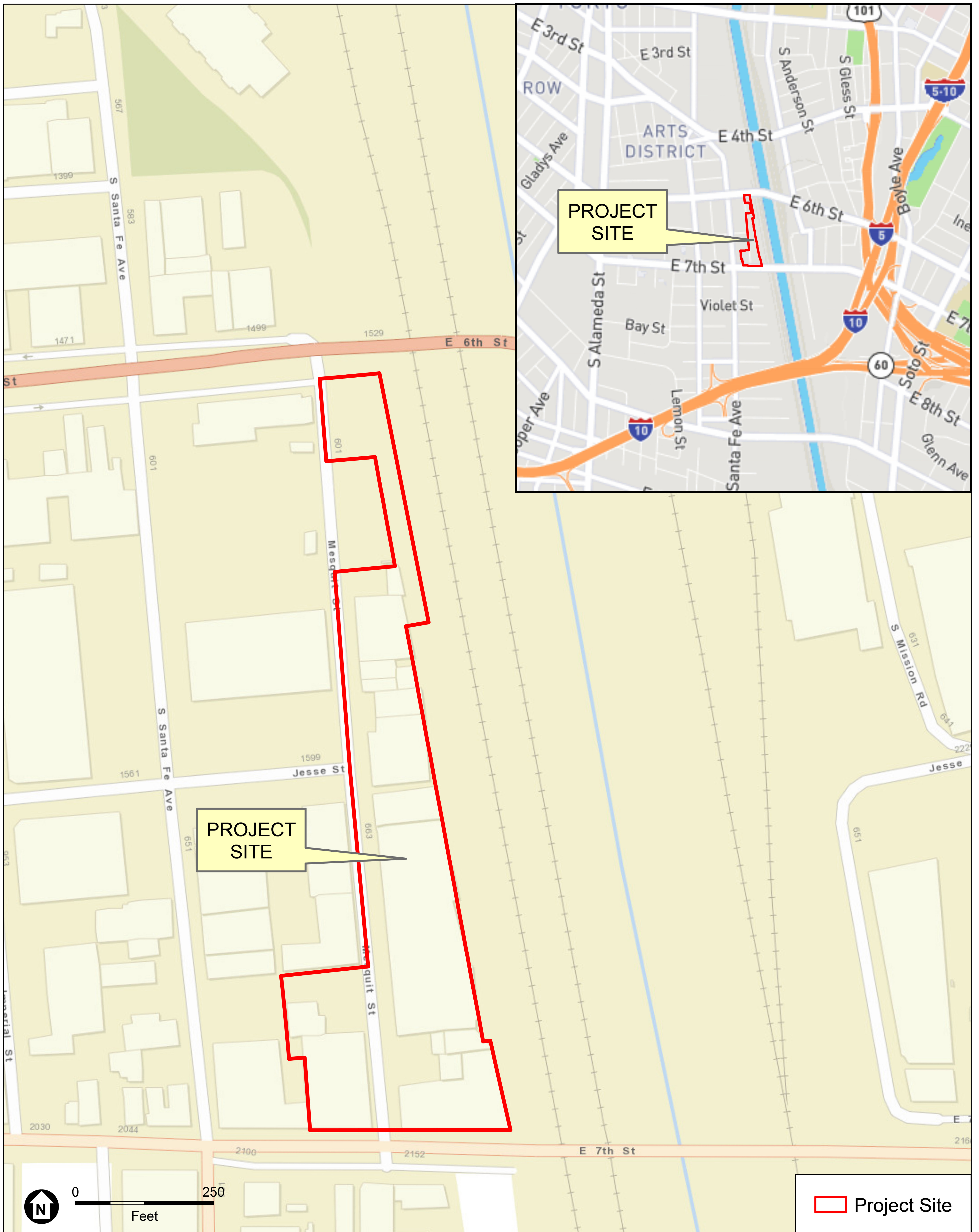
- Approximately 83,000 sf of open space
- Approximately 151 trees
- 2 River Balconies
- 3 Entry Plazas with views to the Los Angeles River
- Numerous street level, terrace, and rooftop deck and garden areas
- Landscaped Northern Area connecting to the Sixth Street Park, Arts, River, and Connectivity Improvements (PARC)
- Terraced walkways interconnect the buildings and create indoor and outdoor spaces

PEDESTRIAN DECK

- Pending approval by railroad/transit operating entities, the Project includes a Pedestrian Deck over the adjacent railway property to the Los Angeles River
- Spans the length of the Project Site to connect the 7th Street Bridge and 6th Street/PARC
- Open to the public with Los Angeles River views and connections

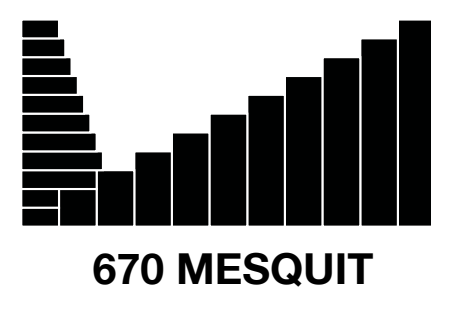
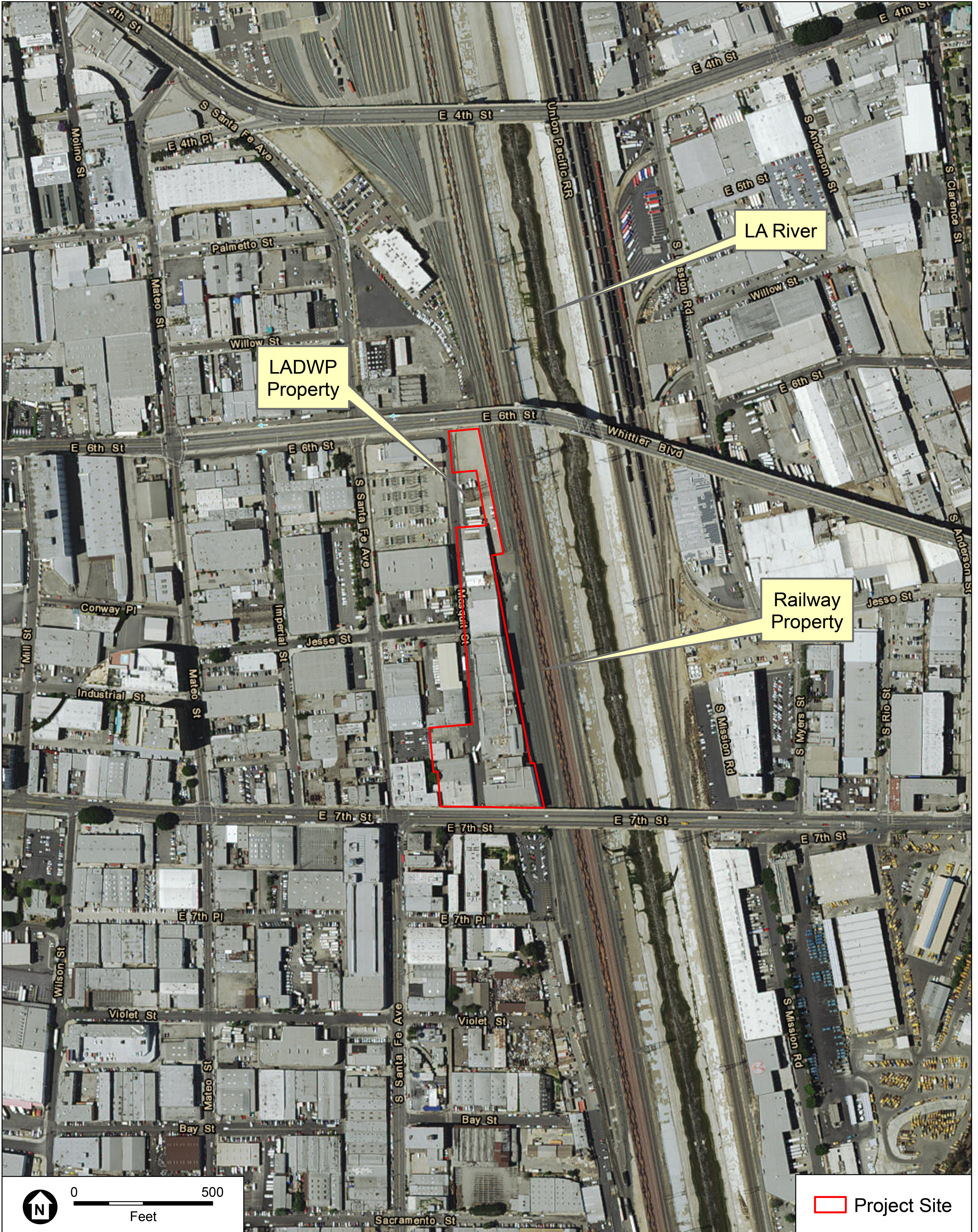


REGIONAL & SITE LOCATION MAP



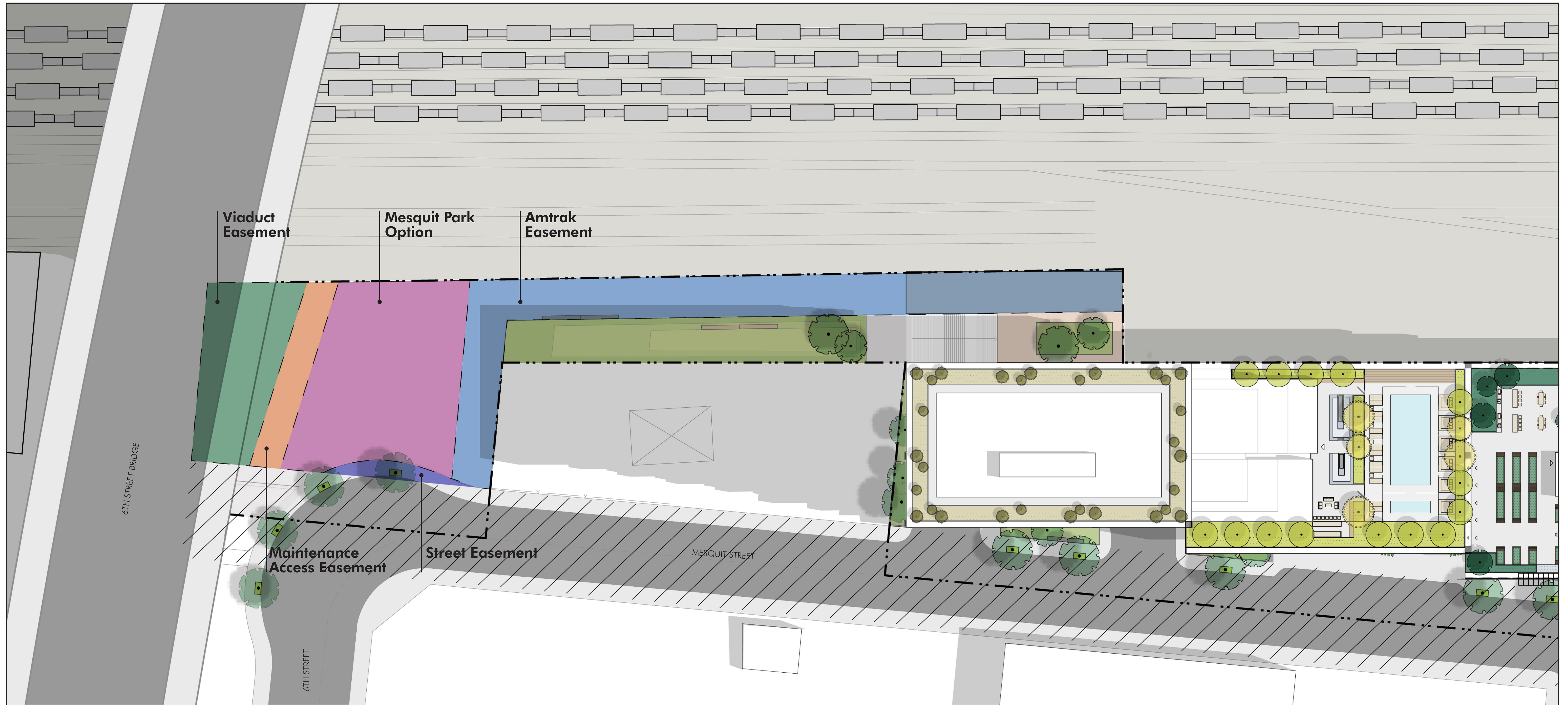
670 MESQUIT







AERIAL VIEW OF PROJECT SITE

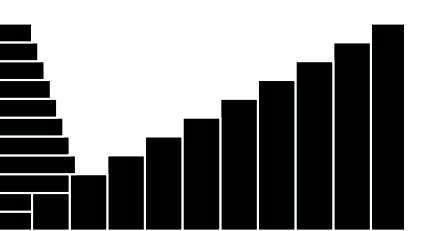


670 MESQUIT

CITY EASEMENT



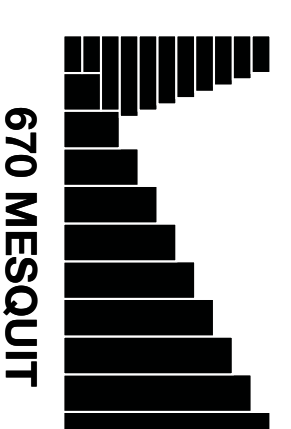
- | | | |
|--|---|---|
|  STREET EASEMENT |  MAINTENANCE ACCESS EASEMENT |  AMTRAK EASEMENT |
|  VIADUCT EASEMENT |  MESQUIT PARK OPTION |  PROPOSED VACATION |



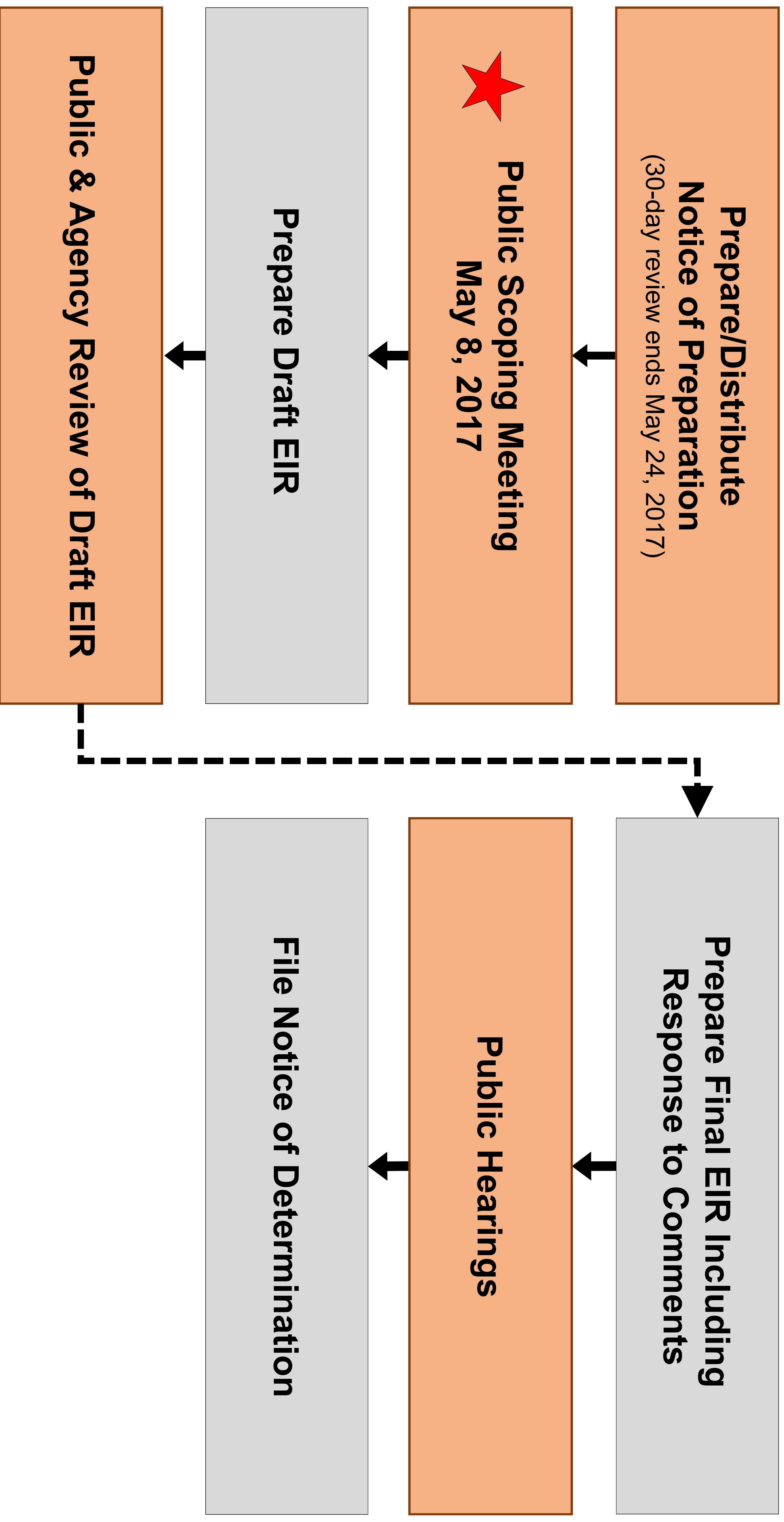
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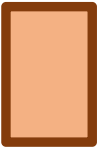
CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)


- **Purpose: To inform decision-makers and the public of a project's potential environmental effects**
- **Increases public understanding of and participation in environmental review process**
- **Discloses potential impacts on the environment**
- **Identifies ways to avoid or reduce potential impacts through mitigation measures or alternatives**

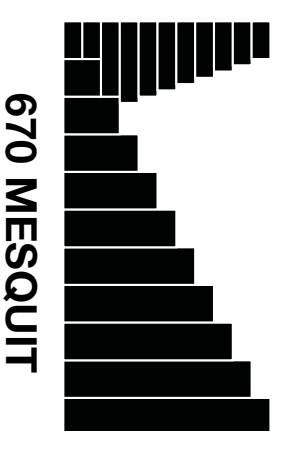
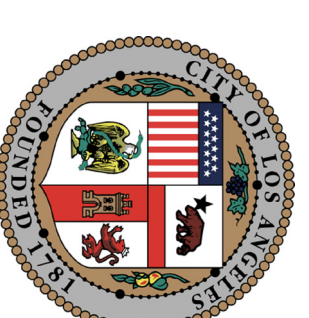


THE EIR PROCESS



 = Opportunities for Public Input

 = We are here in the process



Discretionary entitlements, reviews, and approvals required or requested may include, but are not necessarily limited to:

- General Plan Amendment to the Central City North Community Plan to change the Community Plan land use designation from Heavy Industrial to Regional Center Commercial, and to change the Circulation Element of the General Plan (the Mobility Plan 2035) and the Community Plan Land Use Map to redesignate Mesquit Street from a Collector Street to a Local Limited Street
- Vesting Zone Change and Height District Change from M3-1-RIO to C2-3-RIO
- Three affordable housing incentives through the City's Density Bonus Law: Averaging Floor Area Ratio (FAR), Density, Parking, Open Space, and Vehicular Access; FAR increase; and an incentive to allow the area of any land required to be dedicated for street or alley purposes to be included as lot area for purposes of calculating the Project's FAR
- Vesting Tentative Tract Map for the merger and re-subdivision, as well as absorb a portion of Mesquit Street to be vacated, to create ground lots and airspace lots, together with approval of a haul route
- Development Agreement (20-year)
- Other discretionary and ministerial permits and approvals that will or may be required

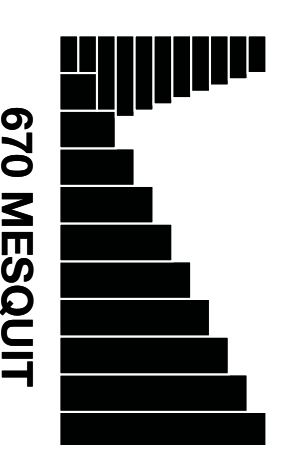
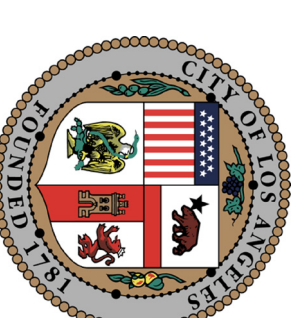


PROPOSED ENTITLEMENTS & APPROVALS

Discretionary entitlements, reviews, and approvals required or requested may include, but are not necessarily limited to:

Specific Plan which could be inclusive of the following:

- Major Development Project Conditional Use Permit,
- Vesting Conditional Use for Floor Area Ratio (FAR) Averaging and Residential Density Transfer in Unified Developments,
- Master Conditional Use for on-site and off-site sale of Alcoholic Beverages,
- Master Conditional Use for Dance Hall(s),
- Vesting Conditional Use Permit for Heliport,
- Special Permission for a Reduction of Off-Street Parking Spaces by the Director,
- Variance to permit a reduction of the amount of on-site parking spaces otherwise required,
- Variance to permit off-site parking to be provided at a property more than 750 feet from the Project Site,
- Variance to permit the siting of bicycle parking spaces at an alternative location,
- Zoning Administrator's Adjustment to permit a zero-foot setback in lieu of any otherwise required setbacks,
- Variation from the street dedication requirements under the Mobility Plan 2035, and
- Applicable provisions from the Greater Downtown Housing Incentive Area such as allowing the area of any land required to be dedicated for street or alley purposes to be included as lot area for purposes of calculating the Project's FAR.



SCOPE OF EIR ANALYSIS

- **Aesthetics**
- **Air Quality**
- **Cultural Resources**
- **Geology and Soils**
- **Greenhouse Gas Emissions**
- **Hazards and Hazardous Materials**
- **Hydrology and Water Quality**
- **Land Use and Planning**
- **Noise**
- **Population and Housing**
- **Public Services (Police, Fire, Schools, Parks)**
- **Recreation**
- **Transportation and Traffic**
- **Tribal Cultural Resources**
- **Utilities (Water, Wastewater, Solid Waste, Energy)**



SUBMITTAL OF PUBLIC COMMENTS

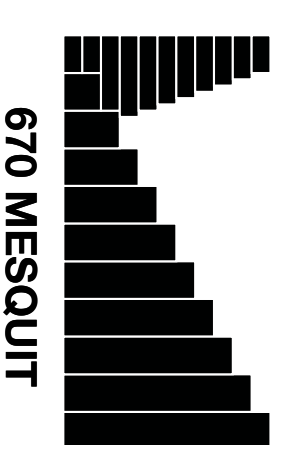
Submit written comments using pre-addressed forms provided tonight:

- 1. Leave in box or provide to City staff or EIR consultants**
- 2. Add postage and mail to City Hall. Please direct EIR comments to:**

Jonathan Chang
City of Los Angeles
Department of City Planning
Major Projects & Environmental Analysis Section
200 N. Spring Street, Suite 750
Los Angeles, CA 90012
Reference: 670 Mesquit EIR

Written comments must be submitted by 4 p.m., May 24, 2017

- 3. Email: Jonathan.Chang@lacity.org**





CITY OF LOS ANGELES
670 MESQUIT PROJECT ENVIRONMENTAL IMPACT REPORT
PUBLIC SCOPING MEETING
CASE No.: ENV-2017-249-EIR
MAY 8, 2017

Please include your mailing address if you wish to receive future notices regarding this case, including publication of the Draft and Final EIR.

Name	Organization (if any)	Address	City, Zip Code	E-mail
Jose Rina	CREED LA	501 Shatto Pl #200	Los Angeles, 90020	jose@creedia.com
AYJIA FLOWERS	CREED LA	501 Shatto PL #20	Los Angeles, 90020	ayjia@creedia.com
THOMAS RUIZ	LABORERS UNION	4399 SANTA ANITA AVE STE 204 EL MONTE, CA	EL MONTE, CA	TRUIZ@LLOF.NET
CINDY SCHNAIZZSTEIN	CARTWHEEL ART	688 S. SANTA FE AVE #106 LA 90021	LA 90021	CINDY@CARTWHEELART.COM
Kirsten Schroeder	Michael Maltzan Arch.			kschroeder@maltzan.com
Chris Pearson	Hudson Pacific	11601 Wilshire Blvd 9th Fl Los Angeles, CA 90025		cpearson@hudsonpacific.com
ALEXIS ALBRET	CARPENTERS	533 S FREMONT AVE	LA 90071	ALBRET@SWCARPENTERS.ORG

A-4 NOP Comments

NATIVE AMERICAN HERITAGE COMMISSION

Environmental and Cultural Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710



May 1, 2017

Jonathan Chang
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Sent via e-mail: jonathan.chang@lacity.org

RE: SCH# 2017041071; 670 Mesquit ENV-2017-249-EIR Project, Los Angeles County, California

Dear Mr. Chang:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for Draft Environmental Impact Report for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a **separate category of cultural resources**, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that 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 (Pub. Resources Code § 21084.2). Please reference California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," <http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf>. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends **lead agencies consult with all California Native American tribes** that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

This process should be documented in the Cultural Resources section of your environmental document.

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires **local governments** to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have been already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

DEPARTMENT OF TRANSPORTATION**DISTRICT 7**

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May 17, 2017

Mr. Jonathan Chang
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

RECEIVED
CITY OF LOS ANGELES**MAY 24 2017****MAJOR PROJECTS
UNIT**

RE: 670 Mesquit
Vic. LA-101/ PMS0.202, LA-05/PM17.01,
LA-10/PM 18.3
SCH # 2017041071
GTS # LA-2017-00879AL-NOP

Dear Mr. Chang:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project proposes to demolish existing cold storage warehouse facilities and construct a mixed-use development totaling approximately 1,792,103 sf of floor area. The project would include office space, 308 multi-family residential units, 16% of which would be affordable, a 236-room hotel, retail, restaurants, studio, event space, gallery and potential museum space, and a gym.

Senate Bill 743 (2013) mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. However, the City may use the Level of Service (LOS) methodology until The Governor's Office of Planning and Research (OPR) complete its CEQA Guideline to implement SB743 (https://www.opr.ca.gov/s_sb743.php).

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, this development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.

As a reminder, the First Amendment to the Agreement between LADOT and Caltrans District 7

on Freeway Impact Analysis Procedures expired December 2016. Currently, the freeway condition is operating near or at capacity in the project vicinity. This project boundary includes the State facilities on US-101, I-5, and I-10. Please confirm the identified study locations for the State facilities with Caltrans prior to preparing the Environmental Impact Report (EIR). The City should refer the project's traffic consultant to Caltrans' traffic study guide Website:

http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

When preparing the traffic study, please include the following elements:

1. Presentations of assumptions and methods used to develop trip generation, trip distribution, choice of travel mode, and assignments of trips to freeway segments of I-110, I-10, I-5, and US-101 within 3 miles radius of the project location (The calculated LOS should be validated using PEMS data with verifiable reference), and on/off ramp accesses with peak hour LOS within 1 mile radius of the project including but not limit to the followings:
 - US-101 SB off-ramp to E 7th St.
 - US-101 NB on-ramp from E 6th St./Whittier Blvd.
 - US-101 NB/SB off-ramp to E 4th St.
 - I-10 EB off-ramps to Porter St.
 - I-10 WB off-ramps to E 8th St.
 - I-10 WB off-ramp to S Boyle Ave.

Caltrans is concerned that additional traffic exiting the freeway may potentially back into the mainline through lanes if the queue exceeds the storage capacity on the off ramps. A queuing analysis should be performed using HCM methodology. The capacity of the off-ramp should be calculated by the actual length of the off-ramp between the terminuses to the gore point with some safety factor (i.e. 85% of total queue length, etc.). The existing queue length should be calculated from the traffic counts, actual signal timing and the actual percent of truck assignments with an adequate passenger car equivalent factor. The analyzed result may need to be calibrated with actual signal timing when necessary.

2. Analysis of ADT, AM and PM peak-hour volumes for both the existing and future conditions in the affected area. Future conditions should include build-out of all projects and any plan-horizon years.
3. Analysis should include existing traffic, traffic generated by the project, cumulative traffic generated from all specific approved developments in the area, and traffic growth other than from the project and developments.
4. A discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. Any mitigation involving transit or Transportation Demand Management (TDM) should be justified and the results conservatively estimated.

Mr. Jonathan Chang

May 17, 2017

Page 3 of 3

5. Fair share contributions toward pre-established or future improvements on the State Highway System is considered to be an acceptable form of mitigation. Please use the following ratio when estimating project equitable share responsibility: additional traffic volume due to project implementation is divided by the total increase in the traffic volume (see Appendix "B" of the Guide).

Please note that for purposes of determining project share of costs, the number of trips from the project on each traveling segment or element is estimated in the context of forecasted traffic volumes, which include build-out of all approved projects, project that have not yet been approved, and other sources of growth.

Caltrans staff is available to consult with the City and traffic consultant. We look forward to reviewing the traffic study and expect to receive a copy from the State Clearinghouse when the DEIR is completed. If you would like to expedite the review process or receive early feedback from the Caltrans please send a copy of the DEIR directly to our office.

If you have any questions or would like to schedule a meeting, please feel free to contact Mr. Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # LA-2017-00879-AL.

Sincerely,



DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

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CITY PLANNING**

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June 1, 2017

DiAnna Watson

Caltrans District 7 – Office of Transportation Planning

100 S. Main Street, MS 16

Los Angeles, CA 90012

Re: 670 Mesquit Project

Dear Ms. Watson:

Thank you for your recent correspondence, dated May 17, 2017, relative to the Notice of Preparation/Initial Study for the 670 Mesquit Project located at 606-694 South Mesquit Street. Your letter requested that five components be included when preparing the 670 Mesquit Project traffic study to assist Caltrans in evaluating the project impacts to State Transportation Facilities and that the study locations for the State facilities be confirmed with Caltrans prior to preparing the Draft Environmental Impact Report. Pursuant to the MOU (Freeway Analysis Agreement) between Caltrans and Los Angeles Department of Transportation (LADOT) executed in 2013 and renewed in 2015, the methodologies and assumptions used to prepare the project traffic study will comply with the screening criteria included in the executed "Freeway Impact Analysis Screening Criteria MOU as agreed upon by the City and Caltrans, as follows:

LADOT will require project applicants to work with Caltrans and prepare a Freeway Impact Analysis, utilizing Caltrans' "Guide for the Preparation of Traffic Impact Studies" (TIS Guide"), for land use proposals that meet any of the following criteria:

- The project's peak hour trips would result in a 1-percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS E or F (based on an assumed capacity of 2,000 vehicles per hour per lane); or
- The project's peak hour trips would result in a 2-percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS D (based on an assumed capacity of 2,000 vehicles per hour per lane); or

- The project's peak hour trips would result in a 1-percent or more increase to the capacity of a freeway off-ramp operating at LOS E or F (based on an assumed ramp capacity of 850 vehicles per hour per lane); or
- The project's peak hour trips would result in a 2-percent or more increase to the capacity of a freeway off-ramp operating at LOS D (based on a an assumed ramp capacity of 850 vehicles per hour per lane).

If any of the four thresholds defined above are exceeded, then LADOT will direct the project applicant to Caltrans for a determination on the specific requirements for a freeway study. However, per the terms of the MOU, if none of the thresholds are exceeded, then the project applicant would not be required by the City to prepare a detailed freeway analysis beyond the freeway analysis mandated by Metro's Congestion Management Program.

Sincerely,



Luciralia Ibarra
Senior City Planner
Major Projects
Department of City Planning

DEPARTMENT OF TRANSPORTATION

DISTRICT 7

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June 6, 2017

Ms. Luciralla Ibarra
Department of City Planning
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

RE: 670 Mesquit Project
SCH # 2017041071
Ref. GTS # LA-2017-00879AL-NOP
GTS # LA-2017-00942-Other
Vic. LA-10/PM 18.3

Dear Ms. Ibarra:

This is a follow-up to your letter dated June 1, 2017 in regards to the MOU (Freeway Analysis Agreement) between Caltrans and Los Angeles Department of Transportation (LADOT). Again, we would like to use this opportunity to reach out to your office.

As a reminder from the renewal of the Agreement signed in December 2015, the Agreement expired in December 2016. Section 2 indicates that "This Agreement will be extended for a period of one year after execution or when the revisions to the California Environment Quality Act are adopted relative to how transportation impacts are determined pursuant to Senate Bill 743, whichever occurs first." The NOP was in circulation in April 2017, therefore the MOU does not apply to this project. When preparing the traffic analysis on the State facilities, please refer the project's traffic consultant to Caltrans' traffic study guide Website:

http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

Caltrans will continue to involve in the development of LADOT's VMT guidelines and to provide feedback on upcoming key milestones in relates to VMT methodology and VMT thresholds, etc. If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # LA-2017-00942AL.

Sincerely,

A handwritten signature in blue ink that reads "Dianna Watson".

DIANNA WATSON

LD-IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:

May 12, 2017

Jonathan.Chang@lacity.org

Jonathan Chang

Major Projects and Environmental Analysis Section

City of Los Angeles Department of City Planning

200 N. Spring Street, Suite 750

Los Angeles, CA 90012

Notice of Preparation of an Environmental Impact Report for the 670 Mesquit (Case No.: ENV-2017-249-EIR)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Environmental Impact Report (EIR). Please send SCAQMD a copy of the EIR upon its completion. Note that copies of the EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the EIR directly to SCAQMD at the address shown in the letterhead. **In addition, please send with the EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files¹. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

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

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

¹ Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. Because the proposed construction would occur over a length of 20 years, it more closely resembles the characteristics of project operation. Therefore, the SCAQMD staff recommends that the Lead Agency quantify the proposed project's critical pollutant emissions and compare the results to the SCAQMD's regional pollutant emissions thresholds to determine the air quality impacts. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

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

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance² on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

Mitigation Measures

In the event that the proposed project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4

² In April 2017, ARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement ARB's Air Quality and Land Use Handbook: A Community Health Perspective. This Technical Advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. Available at: <https://www.arb.ca.gov/ch/landuse.htm>.

(a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the proposed project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 AQMP available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf?sfvrsn=5>
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Alternatives

In the event that the proposed project generates significant adverse air quality and health risks impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a “no project” alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6 (d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.

Permits

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

Data Sources

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

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

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC170426-01

Control Number



May 24, 2017

Mr. Jonathan Chang, Project Planner
Major Projects and Environmental Analysis Section
City of Los Angeles, Department of City Planning
200 N. Spring Street, Suite 750
Los Angeles, California 90012
Phone: (213) 978-1343
E-mail: jonathan.chang@lacity.org

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the 670 Mesquit Project [SCAG NO. IGR9236]

Dear Mr. Chang,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the 670 Mesquit Project ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS) pursuant to Senate Bill (SB) 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.¹ Guidance provided by these reviews is intended to assist local agencies such as local jurisdictions and project proponents to take actions that help contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the 670 Mesquit Project in Los Angeles County. The proposed project includes 1,792,103 square feet (sf) of mixed use floor area, including 944,055 sf of creative office space, 83,789 sf of open space, 308 multi-family residential units, and a 236-room hotel, on a 5.45-acre project site.

When available, please send environmental documentation to SCAG's office in Los Angeles or by email to au@scag.ca.gov providing, at a minimum, the full public comment period for review. If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Assistant Regional Planner, at (213) 236-1874 or au@scag.ca.gov. Thank you.

Sincerely,

Ping Chang
Acting Manager, Compliance and Performance Monitoring

¹ Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS for the purpose of determining consistency for CEQA. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a determination of consistency with the 2016 RTP/SCS for CEQA.

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**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
670 MESQUIT PROJECT [SCAG NO. IGR9236]**

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS. For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the RTP/SCS.

2016 RTP/SCS GOALS

The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>). The goals included in the 2016 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2016 RTP/SCS are the following:

SCAG 2016 RTP/SCS GOALS	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and active transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*</i>
<small>*SCAG does not yet have an agreed-upon security performance measure.</small>	

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG 2016 RTP/SCS GOALS	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.	etc.

2016 RTP/SCS STRATEGIES

To achieve the goals of the 2016 RTP/SCS, a wide range of land use and transportation strategies are included in the 2016 RTP/SCS. Technical appendances of the 2016 RTP/SCS provide additional supporting information in detail. To view the 2016 RTP/SCS, please visit: <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>. The 2016 RTP/SCS builds upon the progress from the 2012 RTP/SCS and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that the SCAG region strives toward a more sustainable region, while the region meets and exceeds in meeting all of applicable statutory requirements pertinent to the 2016 RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

Local input plays an important role in developing a reasonable growth forecast for the 2016 RTP/SCS. SCAG used a bottom-up local review and input process and engaged local jurisdictions in establishing the base geographic and socioeconomic projections including population, household and employment. At the time of this letter, the most recently adopted SCAG jurisdictional-level growth forecasts that were developed in accordance with the bottom-up local review and input process consist of the 2020, 2035, and 2040 population, households and employment forecasts. To view them, please visit <http://www.scag.ca.gov/Documents/2016GrowthForecastByJurisdiction.pdf>. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts			Adopted City of Los Angeles Forecasts		
	Year 2020	Year 2035	Year 2040	Year 2020	Year 2035	Year 2040
Population	19,663,000	22,091,000	22,138,800	4,017,000	4,442,500	4,609,400
Households	6,458,000	7,325,000	7,412,300	1,441,400	1,618,900	1,690,300
Employment	8,414,000	9,441,000	9,871,500	1,899,500	2,104,100	2,169,100

MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for the 2016 RTP/SCS for guidance, as appropriate. SCAG's Regional Council certified the Final PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on April 7, 2016 (please see: <http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx>). The Final PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.



Jonathan Chang <jonathan.chang@lacity.org>

RFI: 670 Mesquit-Notice of Preparation

Sunbula Azieh <sunbula.azieh@lacity.org>
To: Jonathan Chang <jonathan.chang@lacity.org>
Cc: Eduardo Perez <eduardo.perez@lacity.org>

Tue, Apr 25, 2017 at 3:48 PM

Hi Jonathan,

We have received the request for the project stated above and to work on the CEQA studies, require more information regarding the existing and the proposed project. To conduct our wastewater analysis, can you please provide us with:

Existing:

The SQ.FT for the cold storage warehouse facility if the warehouse had been used within a year ago from now.

Proposed:

The a breakdown of the proposed project (308 Residential Units) - uses by residential units such as the following:

Residential (3 bd unit) - XXX units

Residential (2 bd unit) - XXX units

Residential (1 bd unit) - XXX units

If there are not sufficient details of the residential units, please provide the maximum # of Bedrooms per unit that may be build.

Also the breakdown of the SQ.FT for other facilities are needed such as:

Office: XXXX SQ.FT

Grocery & Farmer Market: XXXX SQ.FT

Restaurant: XXXX SQ.FT

Studio & Event: XXXX SQ.FT

Gallery & Museum Space: XXXX SQ.FT

Gym: XXXX SQ.FT

Open Area: XXXX SQ.FT

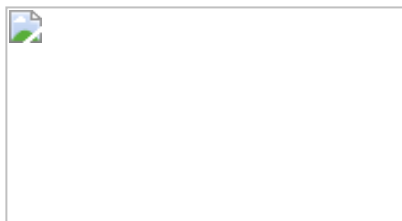
Is there any pool or Spa for the hotel or the residential area? If there is any would you send us the volume for each one.

As soon we receive the information that is needed, we'll be able to continece our study.

Thank you for your attention

Sunny

--
Sunbula Azieh
Wastewater Engineering Services Division - LA Sanitation
City of Los Angeles - Department of Public Works
2714 Media Center Dr
Los Angeles, CA 90065
E-mail: Sunbula.Azieh@lacity.org
Tel: (323) 342-6231
Fax: (323) 342-6210



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Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

May 25, 2017

Jonathan Chang
Major Projects and Environmental Analysis
City of Los Angeles Department of City Planning
200 N. Spring Street, Suite 750
Los Angeles, CA 90012

RE: 670 Mesquit – Notice of Preparation of an Environmental Impact Report (ENV-2017-249-EIR)

Dear Mr. Chang:

Thank you for the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the proposed mixed-use development located at 606-694 S. Mesquit Street, 1494-1498 E. 6th Street, and 2119-2135 E. 7th Street in the City of Los Angeles (Project). This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) regarding issues and opportunities in relation to our facilities and services that may be a result of the proposed Project.

Metro is committed to working with stakeholders across the County to support the development of transit oriented communities (TOCs). TOCs are built by considering transit within a broader community and creating vibrant, compact, walkable, and bikeable places centered around transit stations and hubs with the goal of encouraging the use of transit and other alternatives to driving. Metro looks forward to collaborating with local municipalities, developers, and other stakeholders in their land use planning and development efforts, and to find partnerships that support TOCs across Los Angeles County.

Project Description

RCS VE LLC (Project Sponsor) proposes to demolish existing cold storage warehouse facilities and construct a mixed-use development totaling approximately 1,792,103 sf of floor area. The proposed uses would be accommodated in five new buildings ranging in height from 90 feet to 360 feet. The Project would include creative office space (approx. 944,055 sf); 308 multi-family residential units, 16 percent of which would be affordable; a hotel (236 rooms); retail; restaurants; studio, event, gallery and potential museum space; and a gym. The Project would also include at- and above-grade landscaped open space including amenities totaling 83,789 sf. Additionally, the Project proposes four (4) levels of below-grade parking spanning the Project Site and at- and above-grade structured parking within Buildings 3, 4, and 5, providing approximately 2,000 parking spaces and 930 bicycle parking spaces. A rooftop heliport is also proposed for emergency and occasional use incidental to residential and office uses, providing an amenity for the Project's residents, hotel guests, office workers, and visitors. The resulting floor area ratio (FAR) would be approximately 7.5:1.

A proposed landscaped area at the northern end of the Project site is intended as publicly accessible open space and would connect the Project Site with the Ribbon of Light Bridge and the 12-acre Sixth Street Park, Arts, River, and Connectivity Improvements (PARC) to be located under and adjacent to the Ribbon of Light Bridge. The Project would include two landscaped balconies along the Project's eastern edge; the balcony at the northeastern end of the Project Site would provide stairway access to the Northern Area, Ribbon of Light Bridge, and the Sixth Street PARC.

The Project would also include, pending approval by the railroad/transit operating entities, construction of a pedestrian deck over a portion of the Railway Property to the east of the Project site. The deck would span the length of the Project site and directly connect the 7th Street Bridge and northern edge of the Project site, providing a pedestrian connection to the Ribbon of Light Bridge and the Sixth Street PARC.

Metro Comments

Los Angeles River and Arts District Planning Efforts

Metro is engaged in the planning and implementation of a wide range of significant transportation investments in and around the Division 20 rail maintenance yard and along the Los Angeles River, stretching between Union Station and the Arts District. Given the on-going local and regional planning efforts in this area, Metro appreciates the opportunity to be included in and contribute to the conversation regarding efforts to revitalize the area, all the while ensuring proposed projects build upon the rail infrastructure and operations necessary to accommodate the transportation investments that are actively under development:

1. Red/Purple Line Core Capacity Improvements: In order to accommodate increased service levels on the Red/Purple Lines, Metro is moving forward with several critical infrastructure projects north of and in close proximity to the proposed Project: a widening of the heavy rail tunnel south of the US-101 freeway, a new turnback facility in the Division 20 yard, and a new Maintenance of Way/Non-Revenue Vehicle (MOW/NRV) facility planned for the northeast corner of 6th Street and Santa Fe Avenue. Given the limited Metro-owned right-of-way (ROW) in and around Division 20 and the new MOW/NRV facility, the spatial demands associated with additional rail car storage, and increasingly limited test track availability for the Red/Purple Lines, Metro is currently preparing an integrated space plan for the area.

Per Metro Board direction, as part of the integrated space plan, staff is also exploring opportunities for extending rail service to the Arts District and a new station in the vicinity of 6th Street. Given the ongoing planning efforts in the area and uncertainty with regards to approval, design, funding, and construction of a 6th Street station, it is imperative that Metro coordinate closely with the Project Sponsor as the design of the Project develops. All aforementioned improvements, a possible 6th Street station in particular, will likely expand Metro's existing footprint to the west of existing ROW, directly adjacent to the northern-eastern edge of the Project boundary and the Mesquit Park Area. Metro is currently in discussions with the City of Los Angeles to ensure adequate land is preserved between the proposed Sixth Street PARC Project and the existing Metro-owned ROW on the west bank of the Los Angeles River. Preserving land under and directly adjacent to the future 6th Street Viaduct is key to not precluding a future Metro heavy rail station that could serve the area.

2. High Speed Rail Alignment: Metro is cooperating with the California High Speed Rail Authority as they explore alignments and facilities for the California High Speed Rail project. This project also has the potential to expand the rail's existing ROW footprint in the area.

3. West Santa Ana Branch Transit Corridor Potential Alignment: Metro is evaluating a potential new transit system connecting southeast Los Angeles County to downtown Los Angeles via the abandoned Pacific Electric Right-of-Way/West Santa Ana Branch Corridor (PEROW/WSAB), and a combination of local streets and private and Metro-owned rail ROW. Several alternatives being explored travel along Santa Fe Avenue, less than a city block west of the proposed Project. Such alignment has the potential to have significant aesthetic and functional impacts on the proposed Project. As such, Metro recommends that further Project design and preliminary construction plans be closely coordinated with Metro's WSAB team. For reference, we'd like to direct City staff to the WSAB Transit Corridor Project webpage, which houses the 2013 Alternatives Analysis Report authored by the Southern California Association of Governments (SCAG) as well as Metro's 2015 Technical Refinement Study and the 2017 Northern Alignment Options Screening Report: <https://www.metro.net/wsab>. Please contact Fanny Pan, Senior Director of Subregional Planning, with additional questions at 213-922-3070 or PanF@metro.net.
4. Los Angeles River Connections and Active Transportation: Metro is engaged in the planning and implementation of closing the gap in the Los Angeles River Bike Path near Downtown Los Angeles, including an area adjacent to the proposed Project. The Metro Los Angeles River Bike Path Gap Closure Project runs from Riverside Drive in Elysian Valley to Atlantic Avenue in Vernon and may include a path running along the top of bank or, in some places, within the River channel. The Gap Closure Project is funded under Measure M and is scheduled to begin construction as early as 2023. Metro completed a Feasibility Study for this project in 2016 and plans to award contracts to begin the Gap Closure Project Approval/Environmental Documentation phase in 2017. This phase will include an Alternatives Analysis, which will define the alignment of the path both adjacent to the proposed Project and the larger, 8-mile Gap Closure project area.

The Project Sponsor should consider the following points as it designs features to connect to the Los Angeles River Bike Path Gap Closure Project as well as the Ribbon of Light Bridge and the Sixth Street PARC: i) the Los Angeles River Bike Path Gap Closure Project may include connections to the bridge crossings, including the 7th Street bridge; ii) the Los Angeles River Bike Path Gap Closure Project may include a path alignment at the top of bank, on aerial structures, or within the channel adjacent to the Project; iii) the path may be partially or wholly located within ROW owned by Metro, the Los Angeles County Flood Control District, or the City of Los Angeles.

Metro strongly recommends that the Project Sponsor collaborate with the LA River Bike Path Gap Closure Project team on any further design of development of preliminary construction plans for the Project. Please contact Julia Salinas, Transportation Planning Manager in Active Transportation with additional questions at 213-922-7413 or SalinasJu@metro.net.

Further, Metro also encourages the Project Sponsor to coordinate with the Metro Bike Share program for a potential Bike Share station at this development. The City should work with the Project Sponsor to help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations. The Project is also encouraged to support these connections with wayfinding signage inclusive of all modes of transportation.

Rail Operations

It is noted that the eastern edge of the Project abuts the western bank of the Los Angeles River and is adjacent to an active and highly utilized regional railroad corridor. From west to east, the railroad corridor includes: two (2) Metro-owned tail tracks used in the operation, storage, and maintenance of the Metro Red/Purple Lines; one (1) lead Amtrak track connecting trains to a maintenance yard; four

(4) BNSF tracks with active freight operations; and an additional two (2) Metro-owned tracks with active Metrolink and Amtrak regional rail operations as well as BNSF freight trains along the west bank of the Los Angeles River (“Main Line”). The Southern California Regional Rail Authority (SCRRA), a joint powers authority, operates the Metrolink commuter rail service and dispatches all trains (Amtrak, Metrolink and freight) on all railroad tracks along the Los Angeles River banks, with the exception of trains using the Metro-owned tail tracks on the west bank. As the Project proposes a deck over the west bank railroad corridor, Metro recommends the Project Sponsor also consult with Amtrak, BNSF, and SCRRA for adherence to their standards and encroachment procedures. SCRRA standards and encroachment procedures can be found on their website at www.metrolinktrains.com.

Metro welcomes the opportunity to collaborate closely with the Project Sponsor throughout the design refinement process to ensure structural, operational, and urban design compatibility with Metro structures, facilities, and services. The Project Sponsor should consider the following as it explores the feasibility of building next to and spanning over the active rail ROW:

1. Trains may operate in and out of revenue service 24 hours a day, 7 days a week in the rail ROW adjacent to the proposed Project. Design and construction of any Project elements should avoid direct impacts to the existing and future planned tracks and minimize impacts to on-going rail operations by Metro, SCRRA, Amtrak, and BNSF. The total cost of any impact to operations will be the responsibility of the Project Sponsor and not be borne by Metro or SCRRA. Access to Metro ROW before, during or after construction will require a right-of-entry permit from Metro and SCRRA.
2. Considering the proximity of the proposed Project to the railroad ROW, the Metro, Metrolink, Amtrak, and BNSF trains will produce air quality, noise, vibration, and visual impacts. The Project Sponsor should consider the proximity to the active ROW as the Project design evolves, including design, construction, and maintenance of temporary and permanent protective fencing. A recorded Noise Easement Deed in favor of Metro is required, a form of which is attached. The easement recorded in the Deed will extend to successors and tenants as well. In addition, any air quality, noise, and vibration mitigation required for the Project must be borne by the developers of the Project and not Metro.
3. As the Project is proposed to be built on land previously reserved for industrial uses and located directly adjacent to a highly active railroad ROW, the Project Sponsor should be mindful of and consider possible contaminated soil and groundwater conditions in designing the Project’s underground and at-grade elements.
4. Where the property is immediately adjacent to Metro ROW, all structures, walls, and fences as part of the development should be set back five (5) feet from Metro property line to allow adequate space for property maintenance. Property owners will not be permitted to access Metro property to maintain private development. Additional setbacks may be required to provide safe train operator sight lines when approaching a future station area.
5. Should the deck concept move forward under further consideration, the Project Sponsor will be required to submit detailed plans, specifications, calculations and construction work plans for Metro and SCRRA review and approval. Please note that Metro and SCRRA require an Engineering Review Fee for such evaluation.
6. Use of airspace above Metro ROW will require an easement, lease or other related agreements for use of such space. Typically, use of Metro ROW (including sub-surface or air rights) requires compensation for the fair market value of the easement/leasehold.

7. The Project Sponsor should notify Metro of any changes to the building/construction plans that may impact the use of the ROW. Construction and/or excavation work on Metro ROW with potential to damage the tracks and related infrastructure may be subject to additional OSHA safety requirements.
8. The Project Sponsor should be advised that construction activities will not be allowed to impact Metro property and equipment. Metro Operations must review construction plans and operations prior to any permits being issued. If the deck is constructed, the developer shall assume all responsibility, liability, risks and cost for the construction, operations and maintenance thereof, including the cost of any future maintenance impacts to Metro's infrastructure and property resulting from the project. All construction and maintenance activities within, over or immediately adjacent to Metro infrastructure is subject to Metro Track Allocation and Rail Safety requirements.
9. Consistent with Zoning Information No. ZI 1117, prior to the City issuing a building permit within 100 feet of the Metro Rail construction area, clearance shall be obtained from Metro. Metro will need to review engineering drawings and calculations. Please refer to the attached Metro "Design Criteria and Standards, Volume III - Adjacent Construction Design Manual" for more details regarding submitting drawings and calculations to Metro for review. Please note that Metro requires an Engineering Review Fee for evaluation of any impacts based on adjacency and relationship of the proposed building to the Metro existing structures. For more information, please contact Aspet Davidian at 213-922-5258 / DavidianA@metro.net.
10. There shall be no encroachment onto the railroad ROW. If access is necessary for the Project Sponsor or its contractor to enter the ROW before and during construction, a temporary right-of entry agreement must be obtained from Metro. Contact John Potts, Deputy Executive Officer of Real Estate, at 213-922-2435 for right-of-entry permits. All construction and maintenance activities within, under or immediately adjacent to Metro infrastructure is subject to Metro Track Allocation and Rail Safety requirements.
11. During construction, a protection barrier of acceptable material shall be constructed to prevent objects, material, or debris from falling onto the Metro ROW.
12. Metro staff shall be permitted to monitor construction activity to ascertain any impact to the ROW. The City should be advised that Metro may request reimbursement for costs incurred as a result of Project construction monitoring, as well as Project construction and operation issues that cause delay or harm to Metro service delivery or infrastructure.

Bus Service Adjacency

Metro bus lines 60 and 62 operate on 7th Street, adjacent to the proposed project. Although the project is not expected to result in any long-term impacts on bus transit, the developer should be aware of the services that are present. Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 regarding construction activities that may impact Metro bus lines at least 30 days in advance of initiating construction activities. For closures that last more than six months, Metro's Stops and Zones Department will also need to be notified at 213-922-5190, 30 days in advance of initiating construction activities.

Congestion Management Program

Beyond impacts to Metro facilities and operations, Metro must also notify the Project Sponsor of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is

required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the “2010 Congestion Management Program for Los Angeles County,” Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

Metro appreciates the Project Sponsor’s ambitious development plans and interest in designing a Project that contributes to the Arts District and Los Angeles River revitalization efforts. We look forward to continued coordination as the Project design and our own plans advance. If you have any questions regarding this response, please contact Eddi Zepeda at 213-922-7658 or by email at DevReview@metro.net. Metro looks forward to reviewing the Draft EIR. Please send it to the following address:

Metro Development Review
One Gateway Plaza MS 99-23-4
Los Angeles, CA 90012-2952

Sincerely,



Therese W. McMillan
Chief Planning Officer, Countywide Planning and Development

Attachments: Adjacent Construction Design Manual
CMP Appendix D: Guidelines for CMP Transportation Impact Analysis
Noise Easement Deed

ADJACENT CONSTRUCTION DESIGN MANUAL

1.0 INTRODUCTION

- 1.1 Parties planning construction over, under or adjacent to a Metropolitan Transportation Authority (MTA) facility or structure are advised to submit for review seven (7) copies of their drawings and four (4) copies of their calculations showing the relationship between their project and the MTA facilities, for MTA review. The purpose of the MTA review is to reduce the chance of conflict, damage, and unnecessary remedial measures for both MTA and the parties. Parties are defined as developers, agencies, municipalities, property owners or similar organizations proposing to perform or sponsor construction work near MTA facilities.
- 1.2 Sufficient drawings and details shall be submitted at each level of completion such as Preliminary, In-Progress, Pre-final and Final, etc. to facilitate the review of the effects that the proposed project may or may not have on the MTA facilities. An MTA review requires internal circulation of the construction drawings to concerned departments (usually includes Construction, Operations, Maintenance, and Real Estate). Parties shall be responsible for all costs related to drawing reviews by MTA. MTA costs shall be based upon the actual hours taken for review at the hourly rate of pay plus overhead charges. Drawings normally required for review are:
- A. Site Plan
 - B. Drainage Area Maps and Drainage Calculations
 - C. Architectural drawings
 - D. Structural drawings and calculations
 - E. Civil Drawings
 - F. Utility Drawings
 - G. Sections showing Foundations and MTA Structures
 - H. Column Load Tables
 - I. Pertinent Drawings and calculations detailing an impact on MTA facilities
 - J. A copy of the Geotechnical Report.
 - K. Construction zone traffic safety and detour plans: Provide and regulate positive traffic guidance and definition for vehicular and pedestrian traffic adjacent to the construction site to ensure traffic safety and reduce adverse traffic circulation impact.
 - L. Drawings and calculations should be sent to:

MTA Third Party Administration (Permits Administration)
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, California 90012

- 1.3 If uncertainty exists on the possible impacts a project may have on the MTA facilities, and before submitting a formal letter requesting a review of a construction project adjacent to the Metro System, the party or his agent may contact the MTA Third Party Administrator (Permits). The Party shall review the complexity of the project, and receive an informal evaluation of the amount of detail required for the MTA review. In those cases, whereby it appears the project will present no risk to MTA, the Third Party Administrator (Permits) shall immediately route the design documents to Construction, Operations, Maintenance, and Real Estate departments for a preliminary evaluation. If it is then confirmed that MTA risk is not present, the Administrator shall process an approval letter to the party.
- 1.4 A period of 30 working days should be allowed for review of the drawings and calculations. Thirty (30) work days should be allowed for each successive review as required. It is noted that preliminary evaluations are usually produced within 5 working days.
- 1.5 The party shall reimburse the MTA for any technical review or support services costs incurred that are associated with his/her request for access to the Metro Rail System
- 1.6 The following items must be completed before starting any construction:
 - A. Each part of the project's design may be reviewed and approved by the MTA. The prime concern of the MTA is to determine the effect of the project on the MTA structure and its transit operations. A few of the other parts of a project to be considered are overhead protection, dust protection, dewatering, and temporary use of public space for construction activities.
 - B. Once the Party has received written acceptance of the design of a given project then the Party must notify MTA prior to the start of construction, in accordance with the terms of acceptance.
- 1.7 Qualified Seismic, Structural and Geotechnical Oversight

The design documents shall note the name of the responsible Structural Engineer and Geotechnical Engineer, licensed in the State of California.

2.0 REVIEW PROCEDURE

- 2.1 All portions of any proposed design that will have a direct impact on an MTA facility or structure will be reviewed to assure that the MTA facility or structure is not placed in risk at any time, and that the design meets all applicable codes and criteria. Any portion of the proposed design that is to form part of an MTA controlled area shall be designed to meet the MTA Design Criteria and Standards.
- 2.2 Permits, where required by the local jurisdiction, shall be the responsibility of the party. City of L.A. Dept. of Bldg. and Safety and the Bureau of Engineering permit review shall remain in effect. Party shall refer to MTA Third Party Administration policies and procedures, THD5 for additional information.
- 2.3 Monitoring of the temporary support of excavation structures for adjacent construction shall be required in all cases for excavations within the geotechnical zone of influence of MTA structures. The extent of the monitoring will vary from case to case.
- 2.4 Monitoring of the inside of MTA tunnels and structures shall be required when the adjacent

excavation will unload or load the MTA structure or tunnel. Monitoring of vertical and horizontal distortions will include use of extensometers, inclinometers, settlement reference points, tiltmeters, groundwater observation wells, tape extensometer anchor points and load cells, as appropriately required. Acceptable limits of movement will depend on groundwater conditions, soil types and also the length of service the stations and tunnels have gone through. Escorts will be required for the survey parties entering the Metro operating system in accordance with MTA Operating Rules and Procedures. An MTA account number will be established and the costs for the escort monitoring and surveying service will be billed directly to the party or his agent as in section 1.2.

- 2.5 The calculations submitted for review shall include the following:
- A. A concise statement of the problem and the purpose of the calculation.
 - B. Input data, applicable criteria, clearly stated assumptions and justifying rationale.
 - C. References to articles, manuals and source material shall be furnished with the calculations.
 - D. Reference to pertinent codes and standards.
 - E. Sufficient sketches or drawing references for the work to be easily understood by an independent reviewer. Diagrams indicating data (such as loads and dimensions) shall be included along with adequate sketches of all details not considered standard by MTA.
 - F. The source or derivation of all equations shall be shown where they are introduced into the calculations.
 - G. Numerical calculations shall clearly indicate type of measurement unit used.
 - H. Identify results and conclusions.
 - I. Calculations shall be neat, orderly, and legible.
- 2.6 When computer programs are used to perform calculations, the following information shall accompany the calculation, including the following:
- A. Program Name.
 - B. Program Abstract.
 - C. Program Purpose and Applications.
 - D. Complete descriptions of assumptions, capabilities and limitations.
 - E. Instructions for preparing problem data.
 - F. Instructions for problem execution.
 - G. List (and explanation) of program acronyms and error messages.
 - H. Description of deficiencies or uncorrected errors.
 - I. Description of output options and interpretations.

- J. Sample problem(s), illustrating all input and output options and hardware execution statements. Typically, these problems shall be verified problems.
 - K. Computer printout of all supporting calculations.
 - L. The "User's Manual" shall also include a certification section. The certification section shall describe the methods and how they cover the permitted options and uses of the program.
- 2.7 Drawings shall be drawn, to scale, showing the location and relationship of proposed adjacent construction to existing MTA structures at various stages of construction along the entire adjacent alignment. The stresses and deflections induced in the existing MTA structures should be provided.
- 2.8 The short-term and long-term effects of the new loading due to the adjacent construction on the MTA structures shall be provided. The soil parameters and other pertinent geotechnical criteria contained in existing contract documents for the affected structure, plus any additional conditions shall be used to analyze the existing MTA structures.
- 2.9 MTA structures shall be analyzed for differential pressure loadings transferred from the adjacent construction site.

3.0 MECHANICAL CRITERIA

- 3.1 Existing services to MTA facilities, including chilled water and condenser water piping, potable and fire water, storm and sanitary sewer, piping, are not to be used, interrupted nor disturbed without written approval of MTA.
- 3.2 Surface openings of ventilation shafts, emergency exits serving MTA underground facilities, and ventilation system openings of surface and elevated facilities are not to be blocked or restricted in any manner. Construction dust shall be prevented from entering MTA facilities.
- 3.3 Hot or foul air, fumes, smoke, steam, etc., from adjacent new or temporary facilities are not to be discharged within 40 feet of existing MTA ventilation system intake shafts, station entrances or portals. Tunnel ventilation shafts are both intake and discharge structures.
- 3.4 Clear access for the fire department to the MTA fire department connections shall be maintained at all times. Construction signs shall be provided to identify the location of MTA fire department connections. No interruption to fire protection water service will be permitted at any time.
- 3.5 Modifications to existing MTA mechanical systems and equipment, including ventilation shafts, required by new connections into the MTA System, shall only be permitted with prior review and approval by MTA. If changes are made to MTA property as built drawings shall be provided reflecting these changes.

At the option of MTA, the adjacent construction party shall be required to perform the field tests necessary to verify the adequacy of the modified system and the equipment performance. This verification shall be performed within an agreed time period jointly determined by MTA and the Party on a case by case basis. Where a modification is approved, the party shall be held responsible to maintain original operating capacity of the equipment and the system impacted by the modification.

4.0 OPERATIONAL REQUIREMENTS

4.1 GENERAL

- A. Normal construction practices must be augmented to insure adequate safety for the general public entering Metro Stations and riding on Metro Trains and Buses. Design of a building, structure, or facility shall take into account the special safety considerations required for the construction of the facility next to or around an operating transit system.
- B. Projects which require working over or adjacent to MTA station entrances shall develop their construction procedures and sequences of work to meet the following minimum requirements:
 - 1. Construction operations shall be planned, scheduled and carried out in a way that will afford the Metro patrons and the general public a clean, safe and orderly access and egress to the station entrance during revenue hours.
 - 2. Construction activities which involve swinging a crane and suspended loads over pedestrian areas, MTA station entrances and escalators, tracks or Metro bus passenger areas shall not be performed during revenue hours. Specific periods or hours shall be granted on a case-by-case basis.
 - 3. All cranes must be stored and secured facing away from energized tracks, when appropriate.
 - 4. All activity must be coordinated through the MTA Track Allocation process in advance of work activity.

4.2 OVERHEAD PROTECTION - Station Entrances

- A. Overhead protection from falling objects shall be provided over MTA facilities whenever there is possibility, due to the nature of a construction operation, that an object could fall in or around MTA station entrances, bus stops, elevators, or areas designed for public access to MTA facilities. Erection of the overhead protection for these areas shall be done during MTA non-revenue hours.
 - 1. The design live load for all overhead protection shall be 150 pounds per square foot minimum. The design wind load on the temporary structures shall be 20 pounds per square foot, on the windward and leeward sides of the structure.
 - 2. The overhead protection shall be constructed of fire rated materials. Materials and equipment shall not be stored on the completed shield. The roof of the shield shall be constructed and maintained watertight.
- B. Lighting in public areas and around affected MTA facilities shall be provided under the overhead protection to maintain a minimum level of twenty-five (25) footcandles at the escalator treads or at the walking surface. The temporary lighting shall be maintained by the Party.

- C. Wooden construction fencing shall be installed at the boundary of the areas with public access. The fencing shall be at least eight-feet high, and shall meet all applicable code requirements.
- D. An unrestricted public access path shall be provided at the upper landing of the entrance escalator-way in accordance with the following:
 - 1. A vertical clearance between the walking surface and the lowest projection of the shield shall be 8'-0".
 - 2. A clear pedestrian runoff area extending beyond the escalator newel shall be provided, the least dimension of which shall be twenty (20) feet.
 - 3. A fifteen (15) foot wide strip (other than the sidewalk) shall be maintained on the side of the escalator for circulation when the escalator is pointed away from a street corner.
 - 4. A clear path from any MTA emergency exit to the public street shall be maintained at all times.
- E. Temporary sidewalks or pedestrian ways, which will be in use more than 10 days, shall be constructed of four (4") inch thick Portland cement concrete or four(4") inches of asphaltic concrete placed and finished by a machine.

4.3 OVERHEAD PROTECTION - Operating Right-of-Way Trackage

- A. MTA Rail Operations Control Center shall be informed of any intent to work above, on, or under the MTA right-of-way. Crews shall be trained and special flagging operations shall be directed by MTA Rail Operations Control Center. The party shall provide competent persons to serve as Flaggers. These Flaggers shall be trained and certified by MTA Rail Operations prior to any work commencing. All costs incurred by MTA shall be paid by the party.
- B. A construction project that will require work over, under or adjacent to the at grade and aerial MTA right-of-way should be aware that the operation of machinery, construction of scaffolding or any operation hazardous to the operation of the MTA facility shall require that the work be done during non-revenue hours and authorized through the MTA Track Allocation process.
- C. MTA flagmen or inspectors from MTA Operations shall observe all augering, pile driving or other work that is judged to be hazardous. Costs associated with the flagman or inspector shall be borne by the Party.
- D. The party shall request access rights or track rights to perform work during non-revenue hours. The request shall be made through the MTA Track Allocation process.-

4.4 OTHER METRO FACILITIES

- A. Access and egress from the public streets to fan shafts, vent shafts and emergency exits must be maintained at all times. The shafts shall be protected from dust and debris. See

Exhibit A for details.

- B. Any excavation in the vicinity of MTA power lines feeding the Metro System shall be through hand excavation and only after authorization has been obtained through the MTA Track Allocation process. MTA Rail Operations Control Center shall be informed before any operations commences near the MTA power system.
- C. Flammable liquids shall not to be stored over or within 25 feet horizontally of MTA underground facilities. If installed within 25 to 100 feet horizontally of the structure, protective encasement of the tanks shall be required in accordance with NFPA STD 130. Existing underground tanks located within 100 feet horizontally of MTA facilities and scheduled to be abandoned are to be disposed of in accordance with Appendix C of NFPA STD 130. NFPA STD 130 shall also be applied to the construction of new fuel tanks.
- D. Isolation of MTA Facilities from Blast

Subsurface areas of new adjacent private buildings where the public has access or that cannot be guaranteed as a secure area, such as parking garages and commercial storage and warehousing, will be treated as areas of potential explosion. NFPA 130, Standard for Fixed Guideway Transit Systems, life safety separation criteria will be applied that assumes such spaces contain Class I flammable, or Class II or Class III Combustible liquids. For structural and other considerations, isolation for blast will be treated the same as seismic separation, and the more restrictive shall be applied.

- E. **Any proposed facility that is located within 20 feet radius of an existing Metro facility will require a blast and explosion study and recommendations to be conducted by a specialist who is specialized in the area of blast force attenuation. This study must assess the effect that an explosion in the proposed non-Metro facility will have on the adjacent Metro facility and provide recommendations to prevent any catastrophic damage to the existing Metro facility. Metro must approve the qualifications of the proposed specialist prior to commencement of any work on this specialized study.**

4.5 SAFETY REGULATIONS

- A. Comply with Cal/OSHA Compressed Air Safety Orders Title 8, Division 1, Chapter 4, Subchapter 3. Comply with California Code of Regulations Title 8, Title 29 Code of Federal Regulations; and/or the Construction Safety and Health Manual (Part F) of the contract whichever is most stringent in regulating the safety conditions to be maintained in the work environment as determined by the Authority. The Party recognizes that government promulgated safety regulations are minimum standards and that additional safeguards may be required
- B. Comply with the requirements of Chemical Hazards Safety and Health Plan, (per 29 CFR 1910.120 entitled, (Hazardous Waste Operations and Emergency Response) with respect to the handling of hazardous or contaminated wastes and mandated specialty raining and health screening.
- C. Party and contractor personnel while within the operating MTA right-of-way shall

coordinate all safety rules and procedures with MTA Rail Operations Control Center.-

- D. When support functions and electrical power outages are required, the approval MUST be obtained through the MTA Track Allocation procedure. Approval of the support functions and power outages must be obtained in writing prior to shutdown.

5.0 CORROSION

5.1 STRAY CURRENT PROTECTION

- A. Because stray currents may be present in the area of the project, the Party shall investigate the site for stray currents and provide the means for mitigation when warranted.
- B. Installers of facilities that will require a Cathodic Protection (CP) system must coordinate their CP proposals with MTA. Inquiries shall be routed to the Manager, Third Party Administration.
- C. The Party is responsible for damage caused by its contractors to MTA corrosion test facilities in public right-of-way.

End of Section

GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."

D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).

D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

D.5.2 Selection of Horizon Year and Background Traffic Growth. Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

D.6 PROPOSED PROJECT TRAFFIC GENERATION

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

D.8.1 Intersection Level of Service Analysis. The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

D.8.3 Freeway Segment (Mainline) Analysis. For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

D.8.4 Transit Impact Review. CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- Evidence that affected transit operators received the Notice of Preparation.
- A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both “peak hour” and “daily” refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
 - Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
 - For each time period, multiply the result by one of the following factors:
 - 3.5% of Total Person Trips Generated for most cases, except:
 - 10% primarily Residential within 1/4 mile of a CMP transit center
 - 15% primarily Commercial within 1/4 mile of a CMP transit center
 - 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
 - 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
 - 5% primarily Residential within 1/4 mile of a CMP transit corridor
 - 7% primarily Commercial within 1/4 mile of a CMP transit corridor
 - 0% if no fixed route transit services operate within one mile of the project

To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction’s TDM Ordinance measures, but other project specific measures.

- Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

D.9.1 Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$). The lead agency may apply a more stringent criteria if desired.

D.9.2 Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

D.9.3 Project Contribution to Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- Any project contribution to the improvement, and
- The means by which trips generated at the site will access the regional facility.

D.9.4 Transportation Demand Management (TDM). If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

D.10 REFERENCES

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.

RECORDING REQUESTED BY
AND WHEN RECORDED MAIL TO:

LOS ANGELES COUNTY METROPOLITAN
TRANSPORTATION AUTHORITY
Real Estate Department
Deputy Executive Officer - Real Estate
P: 213-922-2415 F: 213-922-2400
One Gateway Plaza, Mail Stop 99-18-4
Los Angeles, CA 90012-2932

Space Above Line for Recorder's Use

[Recordation of this Public Document is Exempt from all Recording Fees and Taxes Pursuant to
Government Code Section 6103]

Public Agency - No Tax Statement

NOISE EASEMENT DEED

For valuable consideration, receipt of which is hereby acknowledged, **(Name of Owner)**, a
_____, for themselves, their heirs, administrators, executors,
successors, assigns, tenants, and lessees do hereby grant, bargain, sell, and convey to the
LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY, a public
agency existing under the authority of the laws of the State of California ("Grantee"), its
successors and assigns, for the use and benefit of the public and its employees, a perpetual,
assignable easement in that certain real property in the City of Los Angeles, County of Los
Angeles, State of California described in Exhibit "A" attached hereto and incorporated herein by
this reference,

Said easement shall encompass and cover the entirety of the Grantors' Property
having the same boundaries as the described Property and extending from the sub-
surface upwards to the limits of the atmosphere of the earth, the right to cause in said
easement area such noise, vibrations, fumes, dust, fuel particles, light, sonic
disturbances, and all other effects that may be caused or may have been caused by
the operation of public transit vehicles traveling along the Project right of way.

Grantor hereby waives all rights to protest, object to, make a claim or bring suit
or action of any purpose, including or not limited to, property damage or personal
injuries, against Grantee, its successors and assigns, for any necessary operating and
maintenance activities and changes related to the Project which may conflict with
Grantors' use of Grantors' property for residential and other purposes, and Grantors
hereby grants an easement to the Grantee for such activities.

The granting of said Easement shall also establish the Grantors' right to further modify or
develop the Property for any permitted use. However, Grantor's rights of development shall
not interfere with the continued operation of Grantee's Project.

It is understood and agreed that these covenants and agreements shall be permanent, perpetual, will run with the land and that notice shall be made to and shall be binding upon all heirs, administrators, executors, successors, assigns, tenants and lessees of the Grantor. The Grantee is hereby expressly granted the right of third party enforcement of this easement.

IN WITNESS WHEREOF, the undersigned has caused its/their signature to be affixed this day of _____, 20____

By: _____
Name

By: _____
Name

(ATTACH NOTARY SEAL AND CERTIFICATE HERE.)

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

CIVIL CODE § 1189

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
County of _____)

On _____ before me, _____
Date Here Insert Name and Title of the Officer

personally appeared _____
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____
Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: _____ Document Date: _____
Number of Pages: _____ Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____
 Corporate Officer — Title(s): _____
 Partner — Limited General
 Individual Attorney in Fact
 Trustee Guardian or Conservator
 Other: _____

Signer Is Representing: _____

Signer's Name: _____
 Corporate Officer — Title(s): _____
 Partner — Limited General
 Individual Attorney in Fact
 Trustee Guardian or Conservator
 Other: _____

Signer Is Representing: _____

CERTIFICATE OF ACCEPTANCE

This is to certify that the interest in the real property conveyed by the foregoing Grant Deed from _____, a **California Limited Partnership**, ("Grantor") to **LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY**, a public agency existing under the authority of the laws of the State of California ("LACMTA"), is hereby accepted by the undersigned on behalf of the LACMTA pursuant to authority conferred by resolution of the Board of Directors of the LACMTA, and the Grantee hereby consents to the recordation of this Deed by its duly authorized officer.

Dated this ____ day of _____, 20__

By: _____
Velma C. Marshall
Deputy Executive Officer - Real Estate

LAW OFFICE OF JOHN P. GIVEN
2461 Santa Monica Blvd., #438
Santa Monica, CA 90404
john@johngivenlaw.com
(310) 471-8485

May 24, 2017

VIA EMAIL ONLY to jonathan.chang@lacity.org

Jonathan Chang
Major Projects and Environmental Analysis Section
City of Los Angeles
Department of City Planning
200 N. Spring St., Suite 750
Los Angeles, CA 90012

RE: Scoping Comments for ENV-2017-249-EIR
Project address: 670 Mesquit Street

Dear Mr. Chang:

Thank you for the opportunity to provide scoping comments for the above-captioned project. In preparation for this letter I have reviewed the April 2017 Initial Study for the project, as well as numerous documents from the project file submitted by the applicant. This letter provides brief general comments with respect to the appropriate scope of the environmental impact report (“EIR”), but should not be construed as an exhaustive review of the Initial Study, project materials, or potentially significant impacts not yet identified during the review process.

As a preliminary matter, please provide notice for all hearings, actions, events, and decisions related to the project at the above mail and/or email addresses, as appropriate.

Project Description

The project proposed at 670 Mesquit Street (the “Project”) is located on approximately 4.6 acres along Mesquit Street between 6th and 7th Streets in the Arts District neighborhood. The proposal seeks to add approximately 0.85 acres through partial street vacation of Mesquit Street to bring the total Project footprint to 5.45 acres. The Project would demolish slightly more than 200,000 square feet of existing one- and two-story cold storage warehouse facilities, replacing those structures with just less than 1.8 million square feet of creative office, residential, hotel, retail, restaurant, and other uses. (Initial Study at A-1, A-6.)¹ The Initial Study describes the office space as the dominant use. It accounts for slightly more than half the area of the proposed development. (A-1.) The project is not yet, but in the future may be, located in a transit priority area. (A-3.) The Initial Study identifies that the Project is located within the Central City North

¹ All subsequent document references are to the Initial Study unless indicated otherwise.

Community Plan Area, the Central City Revitalization Zone, and the Arts District Business Improvement District. (A-6.) The existing zoning is M3-1-RIO, indicating a Heavy Industrial zone designation of Height District 1 located within the River Improvement Overlay District. The corresponding General Plan land use designation is Heavy Industrial. The current height district allows for a FAR of 1.5:1. (A-8.)

The proposal assumes that the City will vacate a portion of the Mesquit Street to be part of the Project. (IS-2, A-8 [Table A-1].) The current square footage area of the Project without the vacation appears to be 201,151 square feet (approximately 4.6 acres). (A-8.) The maximum development on the Project site as currently zoned and without the anticipated vacation (1.5 times the current square footage of 201,151) is 301,726 square feet. The Project including the approximately 0.85 acres added via the partial street vacation has a resulting FAR of 7.5:1. The approximately 1,795,103 square feet of proposed development is thus almost six times larger than what is currently permissible at the Project site and includes several proposed uses that are inconsistent with the existing general plan designation and zoning.

The proposed Project entitlements include a General Plan Amendment, Vesting Zone Change and Height District change, a request for a project-specific Specific Plan allowing numerous conditional use permits for various purposes as well as to establish variances and other departures from existing municipal code requirements, a Vesting Tentative Tract Map for merger and re-subdivision of existing lots, a haul route, a 20-year Development Agreement, and “[o]ther discretionary and ministerial permits and approvals that will or may be required.” (A-25-27.)

The Proposed Project is of “statewide, regional, or areawide significance.”

Based on the project description and existing conditions provided in the Initial Study, it is evident that the project must be considered one of “statewide, regional, or areawide significance,” as it meets several criteria in California Environmental Quality Act (“CEQA”) Guidelines section 15206(b). For example, the Project proposes a General Plan Amendment and the environmental review document will be an EIR. (CEQA Guidelines § 15206(b)(1).) The Project will also include business establishments that exceed the threshold of 500,000 square feet, and will include commercial office buildings exceeding the threshold 250,000 square feet. (Guidelines § 15206(b)(2)(B)-(C).)

Because the proposed Project must be considered one of “statewide, regional, or areawide significance,” the lead agency must follow CEQA Guidelines section 15206, which mandates submission of the Draft EIR to the State Clearinghouse for review by responsible agencies, as well as to the Southern California Association of Governments (SCAG) for its review and comment. In addition, CEQA encourages the lead agency to contact responsible state agencies, and the CEQA Guidelines requires that the lead agency “consult with transportation planning agencies and public agencies that have transportation facilities within their jurisdictions that could be affected by the project.” (Pub. Res. Code § 21092.4; Guidelines § 15205(f).)

The Aesthetics analysis must include consideration of shading impacts on the Los Angeles River and Los Angeles River Master Plan.

The Initial Study describes shadow impacts from the proposed Project in analysis category I.d. (B-2.) In addition to the consideration of shadow impacts on current nearby residential uses, the tallest of which is only seven stories (compared to the Project's proposed thirty stories), the shadow analysis should consider potentially significant impacts to the Los Angeles River and the Los Angeles River Master Plan. For purposes of the analysis, the river and any existing or future river restoration plans in the vicinity of the Project should be considered sensitive receptors. More information about the Los Angeles River Master Plan is available at the Los Angeles Department of Public Works website for the river master plan.²

The Cultural Resources analysis category requires greater review than currently anticipated by the Initial Study.

The Initial Study notes that several buildings currently located at the Project site may be 45 years of age or older and thus may themselves be potentially historic resources. (B-9.) The Initial Study further indicates that the 7th Street bridge is a historical resource that may be impacted by the Project. (*Ibid.*) The Initial Study notes that these historic and potentially historic resources will be studied further in the EIR, along with "other historical resources in the area." (*Ibid.*) The Arts District includes many similarly aged structures as the Project site and further analysis will likely be required to determine whether any nearby structures are potentially historic resources that may be impacted. In addition, the City is on record as considering the Arts District a regionally significant cultural and historic resource, and the EIR should consider impacts to the Arts District itself, not only individual structures.

The City has undertaken a citywide survey of historic structures, but the Central City North Community Plan Area, in which the Project is located, is not yet included in published results.³ The EIR should review not only the Project site buildings and 7th Street bridge for potentially significant impacts to those resources, but also should assess whether adjacent buildings and other structures in the vicinity of the project may be historic and, if so, whether they may be impacted by the Project.

The Initial Study incorrectly asserts that the proposed Project does not physically divide an established community.

Analysis category X.a requires the lead agency to assess whether the Project will "[p]hysically divide an established community." The Initial Study allows that the proposed vacation of a portion of Mesquit Street alone strongly suggests that this question must be analyzed in the EIR. (B-21.) While the Initial Study asserts that vehicular and pedestrian traffic through the Project

² Available at: <http://ladpw.org/wmd/watershed/LA/LARMP/>.

³ (See SurveyLA Findings and Reports, available at: <http://preservation.lacity.org/survey-la-findings-and-reports>.)

site will be enhanced, the description of pedestrian facilities fails to note that views and pedestrian passageways are elevated from grade, and thus do not function as paseos so much as pedestrian entrances to proposed second-floor commercial spaces. (*See* Project renderings: Figures A-11, A-12.)

With an apparent deck height of at least twenty-one feet above street-level grade (*see* Figure A-8), grade-level views through the project toward the Los Angeles River will be entirely obscured, with the Project effectively walling off all views to the east other than the Project and the sky. (Figure A-11). In addition, the pedestrian passages are intended to provide access to a proposed view deck above railroad tracks to the east of the Project site, which would require approvals from multiple public agencies and private companies. (IS-2, A-1.)⁴ The EIR cannot simply assume that such approvals and agreements will be possible or even likely. The EIR must disclose the specific agency approvals and agreements that would be necessary to bring this portion of the Project to fruition, and the range of feasible project alternatives to be studied by the EIR must include variations without the feature.

Moreover, in addition to the potentially significant Project impacts on Mesquit Street, the Project could significantly impact existing circulation, traffic, and parking on Jesse Street, Santa Fe Avenue, Imperial Street, 6th Street/Whittier Boulevard, and 7th Street. Those impacts would serve to divide the established Arts District community between 6th and 7th Streets between the Los Angeles River and Mateo Street, if not further west. The language in the Initial Study implies that there are no potential impacts in the analysis category, but potential impacts are being analyzed out of an abundance of caution. This is incorrect, as the potential of the Project to physically divide the established community is clear, and must be analyzed in the EIR.

The potentially significant land use and planning impacts must include analysis whether all of the requested entitlements are appropriate and available.

Analysis category X.b deals with potential conflicts to applicable land use plans, policies, or regulations of agencies with jurisdiction over the project. (B-21.) While the Initial Study makes clear that potential land use and planning conflicts must be studied (*see* B-22), the proposed Project entitlements are lengthy and complex, and it is not instantly clear that all entitlements are appropriate or even available under the Los Angeles Charter or Municipal Code. For example, the Project proposes a Specific Plan that “*could be inclusive of*” a number of conditional use permits and variances from ordinarily applicable zoning code provisions, among other entitlements. (*Ibid.* [emphasis added].) These include vesting conditional use for FAR averaging and residential density transfer, alcohol, dance hall(s), heliport, reduction in off-street parking, variance to allow required parking to be greater than 750 feet from the Project site, reduction of setbacks, and several other variations from existing requirements.

⁴ *See also* Huge Arts District development along L.A. River races for approval; here's an early look, LA Times (Dec. 11, 2016), *available at*: <http://www.latimes.com/entertainment/arts/la-et-cm-arts-district-megaproject-20161210-story.html>.

In addition, the current Project proposal is somewhat vague in its description, and acknowledges that the entitlements that may be sought by the applicant as part of the Project are not limited to those listed. (*Ibid.* [“The entitlements being requested for the Project include, *but may not be limited to*, the following . . .”; the Specific Plan request “*could be inclusive of the following . . .*”; “*Other discretionary and ministerial permits and approvals that will or may be required.*” (Emphasis added.)])

California courts have long held that “an accurate, stable and finite project description” is a basic requirement of CEQA. (*San Joaquin Raptor Rescue Ctr. v. County of Merced* (2007) 149 Cal.App.4th 645, 655.) The Initial Study provides a somewhat vague and noncommittal project description with respect to the particular entitlements desired or required by the Project. The time for an accurate project description is at hand. The EIR must provide a much more clear and certain project description “sufficient to allow an adequate evaluation and review of the environmental impact.” (*Id.* at 654; *see* CEQA Guidelines § 15124.)

Relative to potentially significant land use impacts, the EIR must include:

- Thorough analysis of the availability and appropriateness of a General Plan Amendment, taking into full consideration the ongoing Community Update Plan process for the Central City North Community Plan (*see* <http://www.dtl2040.org/news--events>, showing the public process for the community plan update has been ongoing for some time, including the scoping process, which preceded this Project’s scoping process by several months);
- Thorough analysis of the consistency of the proposed Zone Change and Height District Change relative to the *existing* general plan as well as to any preliminary draft or final Central City North Community Plan that is considered or adopted prior to final consideration of the Project;
- Discussion of the appropriateness of a Specific Plan apparently intended to solely benefit the Project (noting that few, if any, Specific Plans in the City would be so small as the proposed Project) and analysis of the numerous variances and other variations from the municipal code that such an entitlement would provide, comparing those sub-entitlements to the otherwise effective statutory scheme without creation of the Specific Plan; and,
- Thorough analysis of the availability and appropriateness of a Vesting Tentative Tract Map for a Project that is inconsistent with the currently existing General Plan.

As important, the Project seeks to obtain a 20-year development agreement, which would allow the Project to be completed either in a single phase beginning in 2019 and possibly completed as soon as 2022, or in separate phases not to be completed until as late as 2040. The EIR must include detailed description of Project phasing so that immediate and long-term impacts can be better understood by decisionmakers and members of the public, and project alternatives should

include significant discussion and analysis of phasing alternatives, particularly with respect to construction and timing of Project parking and described public benefit features of the Project.

The EIR must consider whether displacement of existing industrial uses may result in secondary impacts on residential uses in other parts of the City and region.

In the Initial Study's brief analysis of population and housing impacts, the City asserts that there will be no impact in analysis categories XIII.b and XIII.c related to displacement of existing housing or people requiring the construction of replacement housing elsewhere. The Initial Study thus concludes that no further analysis is required. (B-26.) As the applicant's environmental assessment form attests, none of the buildings at the Project site were vacant as of January 19, 2017. (Project EAF submission, p.3.) The Initial Study's cursory analysis does not consider that if the Project were approved the existing industrial uses would necessarily be displaced to some other location.

In the event the current industrial uses are displaced, it is foreseeable that their relocation to another part of the City or region could have a potentially significant impact on housing or persons in the vicinity of the location to which the industrial uses are displaced. The EIR should consider the impact of the loss of industrially zoned land and fully analyze the possibility of displacement of current or potential industrial uses at the site to other parts of the City or region. (*See Muzzy Ranch Co. v. Solano County Airport Land Use Com.* (2007) 41 Cal.4th 372, 383 [noting that impacts from foreseeable displaced development are properly reviewable under CEQA].)

The EIR must analyze potentially significant impacts to "other public facilities," such as roadways.

The Initial Study's discussion of analysis category XIV.e ("other public facilities") concludes that the only public facilities in this catch-all category requiring further study due to potentially significant impacts is public libraries, which may be impacted due to new residents, employees, hotel guests, and visitors to the Project site. The Initial Study notes that those persons will be served by the existing road network, without the need for new roadways or other new transportation infrastructure. Nonetheless, all of the Transportation/Traffic subcategories in analysis category XVI (B-29-31) disclose that potentially significant impacts related to transportation and traffic may occur. The Initial Study is thus premature in concluding that no further analysis is required of "other public facilities," and dependent on the conclusions of a detailed traffic study or other EIR components relevant to other public facilities, or other information that may be provided to the City, further analysis is likely to be required and should be undertaken.

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Jonathan Chang
Dept. of City Planning
May 24, 2017
Page 7

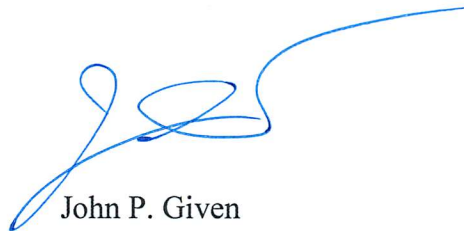
Cumulative Impact analysis must include the ongoing Central City North Community Plan Update as a related project.

The proposed Project is located within a Los Angeles community that has seen unusually high development activity in recent years. The list of related projects whose cumulative impacts must be considered along with the Project when determining whether total impacts are “cumulatively considerable” must be carefully compiled in order to be thorough. In addition to individual development projects, the related project list should include the ongoing Central City North Community Plan Update, whose own scoping process preceded the Project’s by several months. (See discussion supra, pp.5-6.)

Conclusion

Thank you for the opportunity to provide these comments.

Sincerely,



John P. Given



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richard@lozeaudrury.com

Via Email and U.S. Mail

May 2, 2017

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Re: CEQA and Land Use Notice Request for the 670 Mesquit Project, aka ENV-2017-249-EIR

Dear Mr. Chang, Ms. Webber, Ms. Wolcott, and Planning Commission Secretary:

I am writing on behalf of the Laborers International Union of North America, Local Union 300 (“LiUNA”) and Southwest Regional Council of Carpenters (“SWRCC”) and their members living in Los Angeles County and the City of Los Angeles, regarding the 670 Mesquit Project (Case No. ENV-2017-249-EIR), including all actions related or referring to the proposed demolition of existing cold storage warehouse facilities and construction of a mixed-use development totaling approximately 1,792,103 sf of floor area including approx. 944,055 sq.ft of office space, 308 multi-family residential units, a 236 room hotel and new retail on property located at 606-694 S. Mesquit Street, 1494-1498 E. 6th Street, and 2119-2135 E. 7th Street in the City of Los Angeles. (“Project”).

We hereby request that the City of Los Angeles (“City”) send by electronic mail, if possible, or U.S. Mail to our firm at the address below notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City and any of its subdivisions, and/or supported, in whole or in part, through contracts, grants, subsidies, loans or other forms of assistance from the City, including, but not limited to the following:

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.

May 2, 2017

CEQA and Land Use Notice Request for the 670 Mesquit Project

Page 2 of 2

- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act (“CEQA”), including, but not limited to:
 - Notices of any public hearing held pursuant to CEQA.
 - Notices of determination that an Environmental Impact Report (“EIR”) is required for a project, prepared pursuant to Public Resources Code Section 21080.4.
 - Notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.
 - Notices of preparation of an EIR or a negative declaration for a project, prepared pursuant to Public Resources Code Section 21092.
 - Notices of availability of an EIR or a negative declaration for a project, prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations.
 - Notices of approval and/or determination to carry out a project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
 - Notices of approval or certification of any EIR or negative declaration, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
 - Notices of determination that a project is exempt from CEQA, prepared pursuant to Public Resources Code section 21152 or any other provision of law.
 - Notice of any Final EIR prepared pursuant to CEQA.

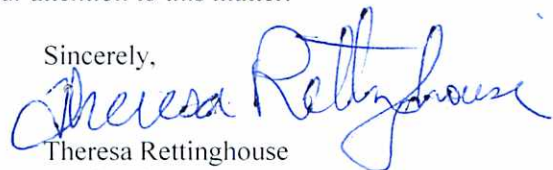
Please note that we are requesting notices of CEQA actions and notices of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law. **This request is filed pursuant to Public Resources Code Sections 21092.2 and 21167(f), and Government Code Section 65092**, which requires agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency’s governing body.

Please send notice by electronic mail, if possible, or U.S. Mail to:

Richard Drury
Theresa Rettinghouse
Lozeau Drury LLP
410 12th Street, Suite 250
Oakland, CA 94607
510 836-4200
richard@lozeaudrury.com
theresa@lozeaudrury.com

Please call if you have any questions. Thank you for your attention to this matter.

Sincerely,



Theresa Rettinghouse
Paralegal
Lozeau | Drury LLP

ENVIRONMENTAL ISSUES & IMPACTS

CEQA requires consideration of the following topics:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology/Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population/Housing
- Public Services
- Recreation
- Traffic/Transportation
- Utilities/Service Systems

Note: Any identifying information provided will become part of the public record and, as such, must be released to any individual upon request.

Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

Our organization strongly supports this project.

CONTACT INFORMATION (Optional, please print clearly)

Name: Jose Rina Representing Agency or Organization: CAZED LA
Address: 501 Shatto Pl #200 City/State/Zip: Los Angeles, 90020

ENVIRONMENTAL ISSUES & IMPACTS

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- Agriculture and Forestry Resources
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Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

- CURRENT INFRASTRUCTURE FOR TRANSPORTATION
TO NEW DEVELOPMENT (ESPECIALLY AS IT
RELATES TO OTHER CURRENT DEVELOPMENTS
& PROPOSED DEVELOPMENTS
(IE. AMP LOFT, WARNER ENTERTAINMENT)
- NOT LOSING INTEGRITY OF NEIGHBORHOOD
BY TEARING DOWN BUILDINGS (ONE-THREE
BETWEEN JESSE & ~~SAN~~ 7TH STREET
TO MAKE ROOM FOR SET-BACKS
AND TRANSPORTATION ENTRY
- HEIGHT IS NOT WITHIN INTEGRITY OF
NEIGHBORHOOD. CONCERN ABOUT
SHADOWING OF BUILDINGS

CONTACT INFORMATION (Optional, please print clearly)

Name: _____ Representing Agency or Organization: _____

Address: _____ City/State/Zip: _____