

## **Appendix A2**

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Initial Study



CITY OF LOS ANGELES  
DEPARTMENT OF CITY PLANNING  
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

# INITIAL STUDY

## 4<sup>th</sup> and Hewitt Project

Case Number: ENV-2017-470-EIR

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**Project Location:** The existing addresses include 900, 902, 904, 906-910, and 926 E. 4<sup>th</sup> Street; 406, 408, and 414 S. Colyton Street; and 405, 407, 411, 417, and 423 S. Hewitt Street, Los Angeles, California 90013. The proposed address would be 401 S. Hewitt Street, Los Angeles, California, 90013.

**Community Plan Area:** Central City North

**Council District:** 14—Huizar

**Project Description:** The proposed 4<sup>th</sup> and Hewitt Project would be located on approximately 1.31 acres at the south side of East 4<sup>th</sup> Street between Colyton Street and South Hewitt Street. The Project retains the approximately 7,800-square-foot (sf) existing Architecture and Design Museum (A+D Museum) and includes the demolition of 6,030 sf of office and related garage space, 1,000 sf of storage space, and approximately 39,751 sf of surface parking lots. The Project would include construction of an 11-story commercial office building that would consist of approximately 14,995 sf of ground floor commercial space, approximately 255,387 sf of office space and lobbies, and approximately 11,021 sf of common area. The proposed building would rise to a maximum height of 190 feet above grade, and the Project's proposed floor area ratio (FAR) would be approximately 5.04:1. The office component would be located on the 5<sup>th</sup> through 11<sup>th</sup> floors. The Project would provide 538 parking spaces on three subterranean levels and on the 2<sup>nd</sup> through 5<sup>th</sup> above-ground floors. In addition, the Project would provide 164 bicycle parking spaces, comprised of 44 bicycle spaces for short term use and 120 for long term use. See Attachment A for additional details.

**PREPARED FOR:**

The City of Los Angeles  
Department of City Planning

**PREPARED BY:**

Envicom Corporation  
4165 E. Thousand Oaks Blvd.  
Suite 290  
Westlake Village, CA 91362

**APPLICANT:**

LIG – 900, 910 and 926 E. 4th St., 405-411 S. Hewitt St., LLC  
6315 Bandini Boulevard  
Commerce, California 90040

**September 2017**

# INITIAL STUDY

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# CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK  
ROOM 395, CITY HALL  
LOS ANGELES, CALIFORNIA 90012

## CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY AND APPENDIX G CHECKLIST

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
City of Los Angeles Department of City Planning	14	September 20, 2017

### RESPONSIBLE AGENCIES

Including, but not limited to, the Regional Water Quality Control Board and South Coast Air Quality Management District.

PROJECT TITLE / NO.	CASE NOS.
4 <sup>th</sup> and Hewitt Project	ENV-2017-470-EIR CPC-2017-469-GPA-VZC-HD-CU-MCUP- SPR VTT-74745

### PROJECT LOCATION

The Project Site is located at 900, 902, 904, 906-910, and 926 E. 4<sup>th</sup> Street; 406, 408, and 414 S. Colyton Street; and 405, 407, 411, 417, and 423 S. Hewitt Street, in Los Angeles, California 90013. The proposed address would be 401 S. Hewitt Street, Los Angeles, California, 90013. The Project Site consists of approximately 1.31 acres located in the Arts District within the City of Los Angeles' Central City North Community Plan Area. The Project Site is located approximately 0.35 miles east of the Los Angeles River, 0.10 miles west of S. Alameda Street, 0.75 miles south of Highway 101, and approximately one mile north of the Santa Monica Freeway (Interstate 10). See Attachment A for additional details.

APPLICANT NAME AND ADDRESS	PHONE NUMBER
LIG – 900, 910 and 926 E. 4th St., 405-411 S. Hewitt St., LLC 6315 Bandini Boulevard Commerce, California 90040	(213) 820-9596

### PROJECT DESCRIPTION

The proposed 4<sup>th</sup> and Hewitt Project would be located on approximately 1.31 acres at the south side of East 4<sup>th</sup> Street between Colyton Street and South Hewitt Street. The Project retains the approximately 7,800-square-foot (sf) existing Architecture and Design Museum (A+D Museum) and includes the demolition of 6,030 sf of office and related garage space, 1,000 sf of storage space, and approximately 39,751 sf of surface parking lots. The Project would include construction of an 11-story commercial office building that would consist of approximately 14,995 sf of ground floor commercial space, approximately 255,387 sf of office space and lobbies, and approximately 11,021 sf of common area. The proposed building would rise to a maximum height of 190 feet above grade, and the Project's proposed floor area ratio (FAR) would be approximately 5.04:1. The office component would be located on the 5th through 11th floors. The Project would provide 538 parking spaces on three subterranean levels and on the 2nd through 5th above-ground floors. In addition, the Project would provide 164 bicycle parking spaces, comprised of 44 bicycle spaces for short term use and 120 for long term use. See Attachment A for additional details.

### ENVIRONMENTAL SETTING

The property consists of six contiguous parcels bounded by Colyton Street to the west, E. 4<sup>th</sup> Street to the north, S. Hewitt Street to the east, and various industrial and commercial uses to the south. Additional existing land uses in the Project vicinity include live/work residential uses. The General Plan designation of the Project Site is Heavy Industrial and the zoning is M3-1-RIO. See Attachment A for additional details.

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

Yes: June 14, 2017.

**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.

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

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

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

William Lamborn

PRINTED NAME

City Planner

TITLE



SIGNATURE

(213) 978-1470

TELEPHONE NUMBER

## EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>III. AIR QUALITY.</b> Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>IV. BIOLOGICAL RESOURCES.</b> Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>



	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>V. CULTURAL RESOURCES:</b> Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>VI. GEOLOGY AND SOILS.</b> Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input 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's exacerbation of the existing environmental 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, would create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?	<input 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 result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including, where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands, caused in whole or in part from the project's exacerbation of existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IX. HYDROLOGY AND WATER QUALITY.</b> 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 uses for which permits have been granted)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>X. LAND USE AND PLANNING.</b> Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XI. MINERAL RESOURCES.</b> 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 checked="" type="checkbox"/>	<input 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"/>
<b>XII. NOISE.</b> Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>XIII. POPULATION AND HOUSING.</b> Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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**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 type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d. Parks?                   | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| e. Other public facilities? | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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"/>            |
| c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?   | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?  | <input 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"/>            |

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.**

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**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"/>
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"/>

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

**XIX. MANDATORY FINDINGS OF SIGNIFICANCE.**

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

**Attachment A**  
**Project Description**

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# INITIAL STUDY

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## Attachment A – Project Description

### A. PROJECT SUMMARY

The Project proposes the construction of a commercial building on approximately 1.31 acres at the south side of East 4<sup>th</sup> Street between Colyton Street and South Hewitt Street, in the City of Los Angeles, California. The 4<sup>th</sup> and Hewitt project (Project) would retain the approximately 7,800-square-foot (sf) existing Architecture and Design Museum (A+D Museum) and includes the demolition of approximately 1,000 sf of storage space associated with the A+D Museum, approximately 6,030 sf of office and related garage/storage space, and approximately 39,751 sf of surface parking lots. The Project would also include the construction of approximately 289,203 square feet (sf) of gross floor area,<sup>1</sup> consisting of approximately 7,800 sf of the existing A+D Museum space, approximately 14,995 sf of ground floor commercial space, approximately 255,387 sf of commercial office space and lobbies, and approximately 11,021 sf of common area. The ground floor would also include a landscaped outdoor plaza and passageway to provide pedestrian access between Colyton and Hewitt Streets, as well as additional access into the A+D Museum and proposed commercial office building. The ground floor area would also include short- and long-term bicycle parking spaces. Vehicle parking spaces would be provided on three subterranean levels as well as on the 2<sup>nd</sup> through 5<sup>th</sup> floors of the proposed building. Office space would comprise a portion of the 5<sup>th</sup> floor and the 6<sup>th</sup> through 11<sup>th</sup> floors. Private balconies would also be provided on the 5<sup>th</sup> through 11<sup>th</sup> floors. The proposed building would include 11 stories, with a roof deck and mechanical equipment located on the rooftop. The structure would rise to a maximum height of 190 feet above grade, and the Project's proposed floor area ratio (FAR) would be approximately 5.04:1. The following sections provide additional Project location, land use, and entitlement details.

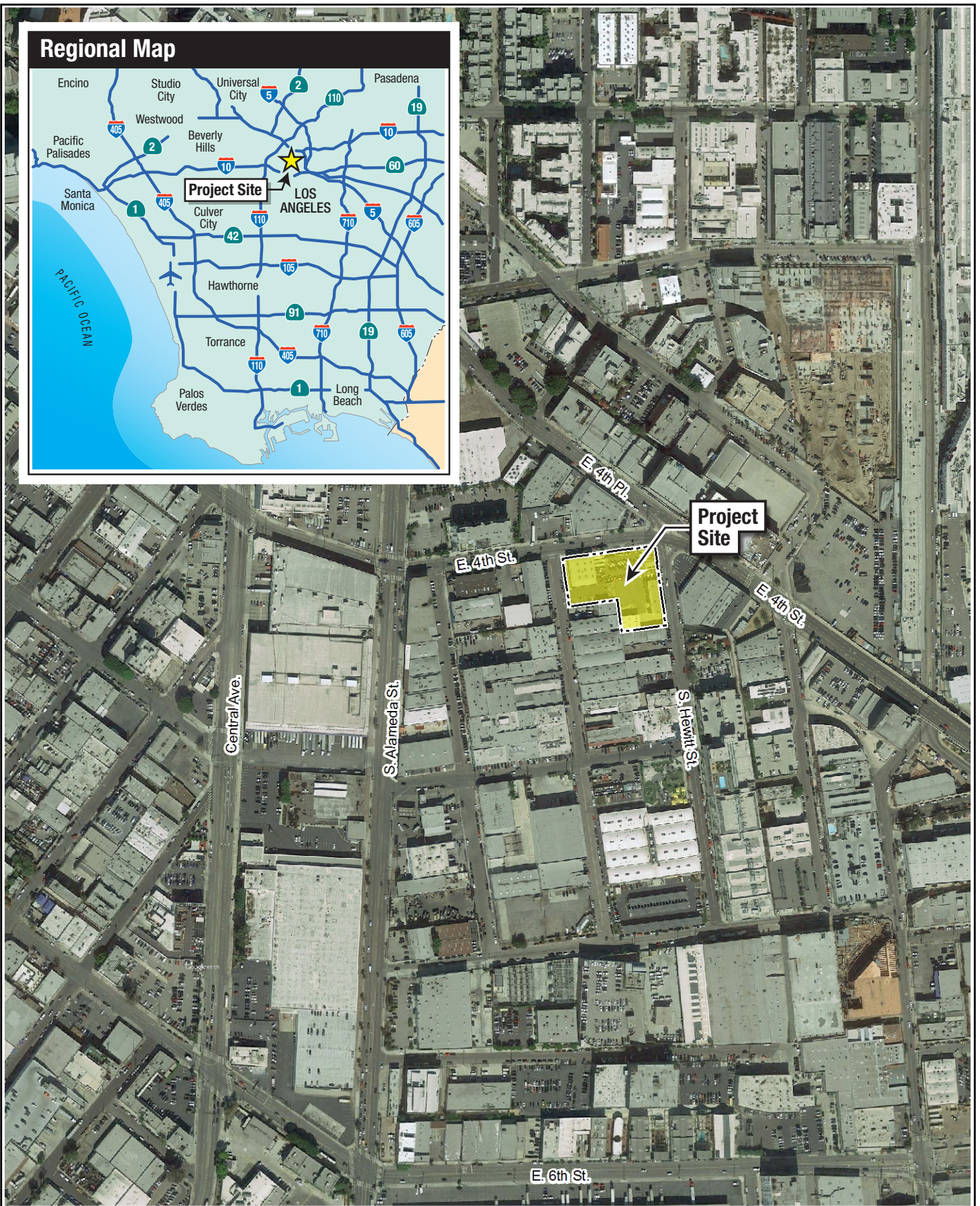
### B. ENVIRONMENTAL SETTING

#### Project Location

The Project would include the construction of a commercial building at 401 South Hewitt Street, Los Angeles, California 90013. The Project Site consists of six contiguous parcels (Project Site), generally bounded by Colyton Street to the west, 4<sup>th</sup> Street to the north, Hewitt Street to the east, and various industrial and commercial uses to the south. The Project location is shown on **Figure A-1**. **Table A-1** below includes the Los Angeles County Assessor Parcel Numbers (APNs) for each of the Property's six parcels, as well as the parcel area in sf, zoning designation, and City of Los Angeles General Plan land use designation.

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<sup>1</sup> Floor area is defined as area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space dedicated to bicycle parking, and basement storage areas.



Aerial GoogleEarth Pro, Oct. 18, 2016.

**Table A-1  
Property Information by Parcel**

<b>APN / Street Address</b>	<b>Area (Net SF) <sup>1</sup></b>	<b>Zoning</b>	<b>General Plan</b>
5163-022-001 / 926 E. 4 <sup>th</sup> St.	6,959	M3-1- RIO	"Heavy Industrial" Land Use Designation <sup>2</sup>
5163-022-002 / 906-910 E. 4 <sup>th</sup> St.	5,002		
5163-022-003 / 900, 902, 904 E. 4 <sup>th</sup> St. and 406 and 408 Colyton St.	10,012		
5163-022-005 / 414 S. Colyton St.	7,506		
5163-022-022 and 5163-022-023 / 405, 407, 411, 417, and 423 S. Hewitt St.	27,624		
<b>TOTAL</b>	<b>57,103 net sf (1.31 acres)</b>		
<sup>1</sup> Psomas. 2016. ALTA/NSPS Land Title and Design Survey for: 4 <sup>th</sup> Street Center. October 13. <sup>2</sup> City of Los Angeles City Planning Department. Central City North Community Plan, A Part of the General Plan - City of Los Angeles. Adopted December 15, 2000. Notes: M3-1-RIO = Manufacturing 3, Height District No. 1, River Improvement Overlay. Site square footage does not include easements and dedications. The addition of these elements results in a site square footage of 57,325 as shown on Vesting Tentative Tract Map No. 74745 (Psomas, January 6, 2017), on which the Project FAR is based.			

## Existing Conditions and Surrounding Land Uses

The Project Site is currently occupied by the A+D Museum at the corner of Colyton Street and 4<sup>th</sup> Street, which would remain in place. The storage space for the Museum (located southeast of the Museum in a separate 1,000-sf structure), a one-story office structure and related garage/storage space (6,030 sf combined), and associated surface parking lots (approximately 39,751 sf) would be demolished as part of the Project.

The Project Site is located in two of the Community Plan’s subareas within the Arts District. The two overlapping subareas are the Artists-in-Residence District and the South Industrial subarea. The Artists-in-Residence subarea notes the migration of artists that now live and work that has been transitioning from predominantly industrial warehouses to live/work spaces. The second subarea, South Industrial, is descriptive of historic uses in the area, as it was dominated by large warehouses that were conveniently located near the truck and railroad yards.

The Project Site is located on the south side of 4<sup>th</sup> Street, which is an industrial and commercial corridor, and it also fronts Colyton and Hewitt Streets. The surrounding uses consist of a mix of low intensity industrial warehouses, an array of commercial uses of varied intensities, and live/work and residential uses. The immediate area of the Arts District has been experiencing a recent boom in commercial uses in the form of office space, retail shops, galleries, studios, museums, restaurants, and bars that have blended with the existing industrial and manufacturing uses. Although the properties in the Project vicinity are designated Industrial and are generally zoned M2-2 and M3-1, the implementation of the Adaptive Reuse Ordinance has allowed for projects with residential components, such as the Row DTLA project, Biscuit Company Lofts, and Toy Factory Lofts, with a growing number of smaller neighborhood commercial uses to complement and support them.

The land uses within the general vicinity of the Property are characterized by a mix of low- to medium-intensity industrial, commercial, and mixed-use buildings, which vary widely in building style and period of construction. The surrounding properties include industrial, office, innovation campuses (i.e., the Los Angeles Cleantech Incubator and La Kretz Innovation Campus), commercial retail, restaurant, multi-family residential buildings, parks, and surface parking lots.

Directly north across 4<sup>th</sup> Street are several auto repair-related businesses, the Miyako Sushi and Washoku School, and live/work lofts. Just north of 4<sup>th</sup> Place are a variety of commercial uses, some of which are under construction. Uses include offices, such as the County of Los Angeles Department of Public Social Services, as well as Art Share L.A., which includes performance space, a gallery, and artist residences. An application has been filed for the 330 S. Alameda Project (City Planning Case No. ENV-2016-3335-EIR), located on S. Alameda Street north of 4<sup>th</sup> Street and south of 4<sup>th</sup> Place, which proposes redevelopment from a heavy industrial-designated use to a residential and commercial mixed-use that would require a General Plan Amendment (GPA) to a Regional Commercial land use designation and zone change.<sup>2</sup>

Directly east of the Property across Hewitt Street is a vacant warehouse, beer garden, Arts District Dog Park, and the Southern California Institute of Architecture. An application has been filed for the property located east of the Project Site at the corner where Hewitt Street, 4<sup>th</sup> Street, and 4<sup>th</sup> Place meet, which proposes the replacement of a warehouse with 93 live/work units and mixed commercial uses. That project (940 E. 4<sup>th</sup> Street Project, City Planning Case No. ENV-2017-611-EAF) would also require a GPA from Heavy Industrial to Regional Center Commercial and a zone change and height district change.<sup>3</sup> Just beyond those uses along 4<sup>th</sup> Street is the 4<sup>th</sup> Street Bridge, which traverses rail yards, and the Los Angeles River, connecting to Boyle Heights.

Just west across Colyton Street toward Alameda Street are several single-story warehouses, one of which is The Container Yard and art center. The uses are enclosed behind structures or fences that are entirely decorated with murals. An application has been filed (400 S. Alameda Project, City Planning Case No. ENV-2016-3656-MND) for the property on 4<sup>th</sup> Street bounded by Alameda and Seaton Streets, which proposes conversion of the three-story brick building into a four-story boutique hotel with ground floor retail and restaurant uses that would also require a GPA from Heavy Industrial to Community Commercial and a zone change and height district change.<sup>4</sup>

To the south of the Property are low-rise warehouses that are used for a variety of industrial and commercial uses, with a few surface parking lots that make up the remainder of the block. Although the entire block is zoned M3-1, the uses are also commercial in nature rather than purely industrial and include a crossfit gym, retail shops, offices, and Urth Caffé. The block south of 5<sup>th</sup> Street includes restaurants, the Los Angeles Cleantech Incubator, La Kretz Innovation Campus, and the new Arts District Park, which faces the Barker Lofts. An application has been filed for the property located southwest of the Project Site (Arts District Center Project, City Planning Case No. ENV-2016-4476-EIR) on 5<sup>th</sup> Street bounded by Colyton and Seaton Streets, proposing the replacement of a two-story industrial building with a 12-story mixed-use

<sup>2</sup> City of Los Angeles Department of City Planning. Case Information. Case No. ENV-2016-3335-EIR. Available at: <http://planning.lacity.org/caseinfo/casesummary.aspx?case=ENV-2016-3335-EIR>. Accessed on August 8, 2017.

<sup>3</sup> City of Los Angeles Department of City Planning. Case Summary & Documents. Case No. ENV-2017-611-EAF. Available at: <http://planning.lacity.org/pdiscaseinfo/Caseld/MjEyNDc50>. Accessed on August 8, 2017.

<sup>4</sup> City of Los Angeles Department of City Planning. 2017. Initial Study/Proposed Mitigated Negative Declaration. 400 S. Alameda Hotel Project. May.

building that would include residential, hotel, and commercial uses. That project would require a GPA from Heavy Industrial to Regional Center Commercial and a zone change and height district change.<sup>5</sup>

## **Public Transit**

The Project Site is located near major transit corridors, including Alameda Street, which provides a north-south connection to the Los Angeles County Metropolitan Transportation Authority (Metro) Gold Line Little Tokyo/Arts District Station located one-half mile to the north. The Metro Gold Line travels between Azusa and East Los Angeles with transfer connections to the Red and Purple Lines at Union Station.<sup>6</sup> The Project area is also served by bus transit along 1<sup>st</sup> Street, 3<sup>rd</sup> Street, 4<sup>th</sup> Street, 6<sup>th</sup> Street, 7<sup>th</sup> Street, Olympic Boulevard, Central Avenue, Boyle Avenue, and Soto Street. The bus stops closest to the Project Site are located at 4<sup>th</sup> Place and Hewitt Street and Merrick Street and Traction Avenue and are served by the Los Angeles Department of Transportation's (LADOT's) Downtown Area Short Hop (DASH) A line, a local community shuttle bus. This line provides connections to Downtown Los Angeles.<sup>7</sup> Additional bus stops in the Project area are located at 4<sup>th</sup> Street and Alameda Street and 4<sup>th</sup> Street and Merrick Street and are served by the Montebello Bus Line M40. Montebello Bus Line M40 and Montebello Bus Line M90 also operate along 4<sup>th</sup> Street. Additional transit service in the Project area is provided by Metro Local Lines 18, 53, and 62, and Metro Rapid Line 720.<sup>8</sup> Further, in the vicinity of the Project Site, the City's Mobility Plan 2035 designates a Tier 1 Protected Bicycle Lane along 6<sup>th</sup> Street just south of the Project Site and also designates Tier 2 bicycle lanes along 7<sup>th</sup> Street just south of the Property and along Mateo, Santa Fe, and 3<sup>rd</sup> Streets in the surrounding neighborhood. Alameda Street is designated as a Bike Path north of 6<sup>th</sup> Street.<sup>9</sup> In addition, according to the City of Los Angeles 2010 Bicycle Plan, 2<sup>nd</sup>, 6<sup>th</sup>, and 7<sup>th</sup> Streets and Central Avenue in the Project vicinity are also designated as part of the Backbone Bikeway Network.<sup>10</sup>

## **Existing General Plan and Zoning Designations**

The Property is located in the Central City North Community Plan (the "Community Plan") area. The Property's land use designation is Heavy Industrial. The Property is zoned M3-1-RIO (Heavy Industrial, Height District No. 1, River Improvement Overlay).

The Heavy Industrial land use designation permits a corresponding M3 zone that allows for a variety of uses and intensities. Over the past two decades, the Artists- in-Residence subarea of this Community Plan, within which the Property is located, have been transforming from a predominantly industrial area to one that is "primarily made up of old warehouses now converted to artists' lofts and studios," as indicated in the Community Plan.<sup>11</sup> In addition, with

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<sup>5</sup> City of Los Angeles Department of City Planning. 2017. Initial Study. Arts District Center. March.

<sup>6</sup> Los Angeles County Metropolitan Transportation Authority. Metro Gold Line. Available at: <https://media.metro.net/documents/9a582fb5-68f7-44e4-903b-b170294abd7e.pdf>. Accessed on June 8, 2017.

<sup>7</sup> Los Angeles County Metropolitan Transportation Authority. Metro Trip Planner. Available at: [https://trips.metro.net/tm\\_pub\\_start.php?place0=926+4th+street%2C+los+angeles&place1=&timecrit0=AR&day0=WED&hour0=+08&min0=+12&ampm0=A&fare=RG&evaluateButton=+Plan+My+Trip](https://trips.metro.net/tm_pub_start.php?place0=926+4th+street%2C+los+angeles&place1=&timecrit0=AR&day0=WED&hour0=+08&min0=+12&ampm0=A&fare=RG&evaluateButton=+Plan+My+Trip). Accessed on June 8, 2017.

<sup>8</sup> Ibid.

<sup>9</sup> Ibid.

<sup>10</sup> Los Angeles Department of City Planning, 2010 Bicycle Plan, Exhibit D: 2010 Bicycle Plan Designated Bikeways. Adopted March 1, 2011.

<sup>11</sup> City of Los Angeles City Planning Department. Central City North Community Plan, A Part of the General Plan - City of Los Angeles, Page I-3. Adopted December 15, 2000.

the advent of the City's Adaptive Reuse Ordinance, the converted buildings now operate as live/work and commercial uses; thus, there is a growing residential population and commercial-oriented uses within the district.

The M3 zone permits a wide range of industrial and manufacturing uses that are in operation in the area. The M3 zone also permits some commercial uses such as restaurant, bar, brewery, retail, museum, studio, and office uses, which can all be found within the immediate surrounding area of the Property.

The Property is also located within the River Improvement Overlay District (RIO). Certain projects located within the RIO, such as the Project, require an Administrative Clearance from the Department of City Planning prior to issuance of a building permit demonstrating compliance with RIO development regulations. Finally, the Property is located within the Los Angeles State Enterprise Zone (the EZ), which permits certain commercial uses to provide two parking spaces per 1,000 sf of gross commercial floor area.

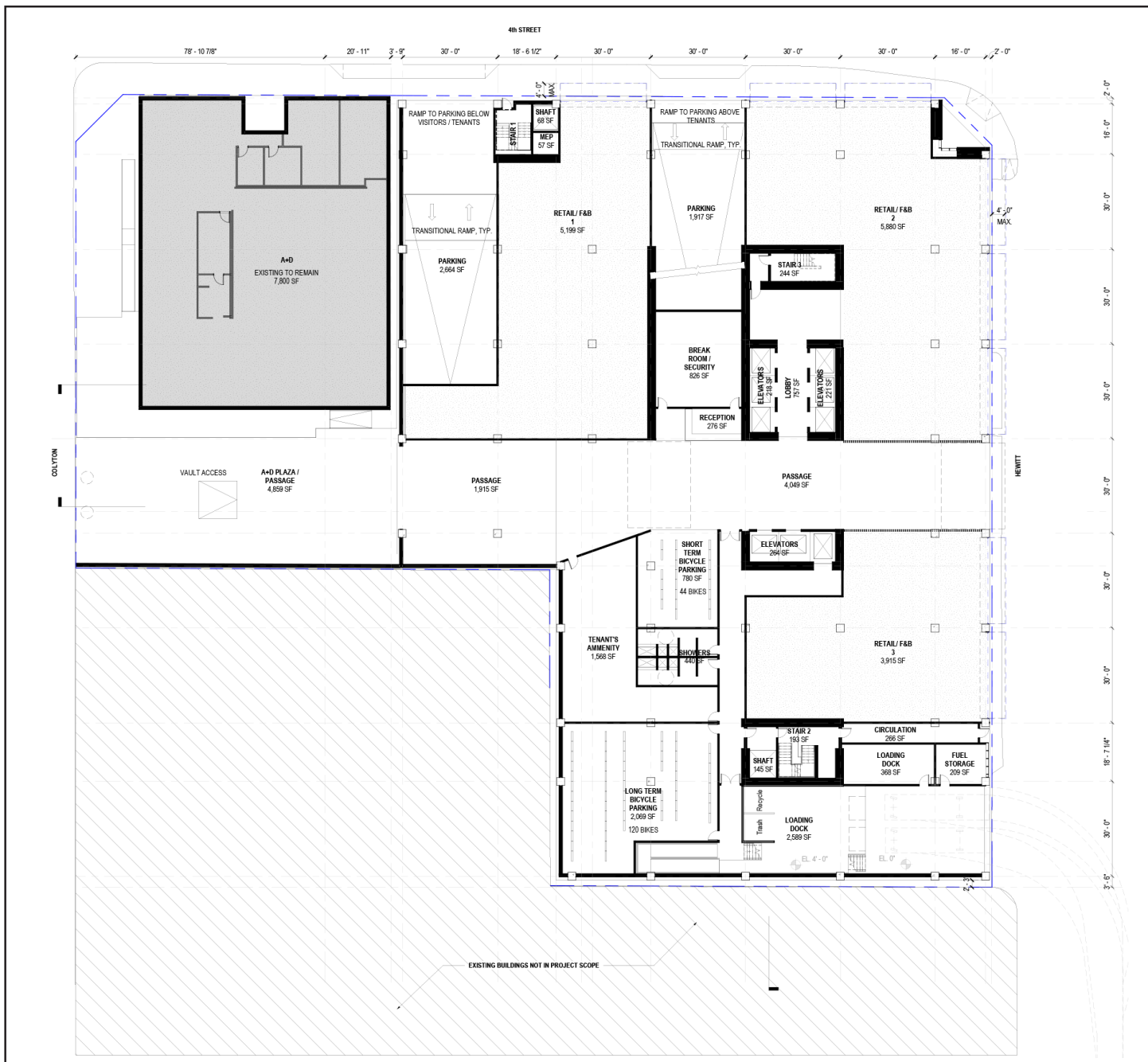
## C. PROJECT DESCRIPTION

### Proposed Land Uses

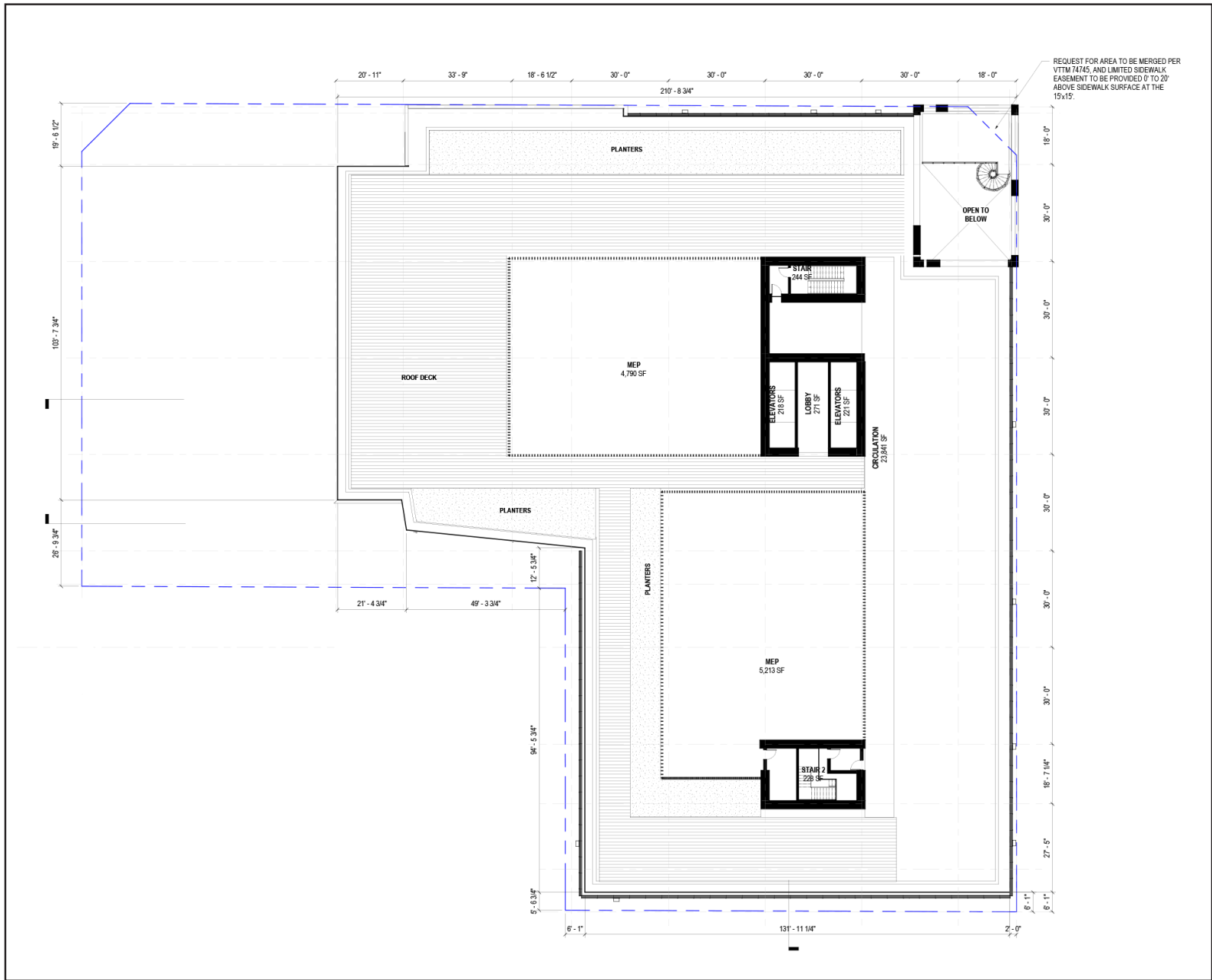
The proposed Project would include a commercial building complementary with other recent development in the Project area, as described above. The Project would be located at the corner of 4<sup>th</sup> and Hewitt Streets, with the new ground floor commercial uses facing 4<sup>th</sup> and Hewitt Streets. The commercial office component would be located on the 5<sup>th</sup> through 11<sup>th</sup> floors. Parking for the Project would be located on three subterranean levels and on the 2<sup>nd</sup> through 5<sup>th</sup> floors. **Figure A-2** provides the Ground Floor Plan for the proposed Project, and **Figure A-3** provides the Roof Plan. **Table A-2** below summarizes the proposed land uses of the Project.

**Table A-2**  
**Proposed Project Land Uses and Floor Area**

Land Use	Floor Area (sf)
A+D Museum (existing, to remain)	7,800
Commercial, common area	11,021
Commercial, ground floor retail/restaurant	14,995
Commercial, upper floor commercial office	255,387
<b>Total Floor Area</b>	<b>289,203</b>
Note: The floor area ratio (FAR) for the Project is based on approximately 289,203 sf of gross floor area, consisting of approximately 7,800 sf of the existing A+D Museum space, approximately 14,995 sf of ground floor commercial space, approximately 255,387 sf of commercial office space and lobbies, and approximately 11,021 sf of common area. The Project FAR is approximately 5.04:1.	



Source: Gensler, July, 2017.



Source: Gensler, July, 2017.



## ***Pedestrian, Vehicle, and Bicycle Site Access***

Pedestrian access points into the Property would include direct access into the A+D Museum from Colyton Street and into each of the ground floor uses from 4<sup>th</sup> and Hewitt Streets. In addition, Colyton and Hewitt Streets would provide access to the passageway to access the main lobby for the commercial office building. The Project's pedestrian passageway would provide a cut-through between Hewitt and Colyton Streets that would entail an outdoor plaza south of the A+D Museum that would continue east into a covered passageway through the office building.

The Project Site is bounded by 4<sup>th</sup> Street (an Avenue III street) to the north, Hewitt Street (a Collector Street) to the east, and Colyton Street (a Collector Street) to the west.<sup>12</sup> General vehicular access into the Project's parking levels would be provided by two driveways from 4<sup>th</sup> Street, including an ingress and egress to/from the subterranean parking garage and another ingress and egress to/from the upper levels of the parking garage. An additional at-grade loading dock would be accessible from Hewitt Street.

The City of Los Angeles Mobility Plan 2035, an Element of the General Plan, was adopted in 2016 and includes maps that show a Bicycle Enhanced Network and a Bicycle Lane Network, which are comprised of arterial streets and other rights-of-way prioritized for bicycle movement. In the vicinity of the Project Site, the Mobility Plan designates a Tier 1 Protected Bicycle Lane along 6<sup>th</sup> Street just south of the Project Site and also designates Tier 2 bicycle lanes along 7<sup>th</sup> Street just south of the Property and along Mateo, Santa Fe, and 3<sup>rd</sup> Streets in the surrounding neighborhood. Alameda Street is designated as a Bike Path north of 6<sup>th</sup> Street.<sup>13</sup>

## ***Vehicle and Bicycle Parking***

The Project would include 538 parking spaces. The parking calculations for the Project are provided in **Table A-3**, below.

The Project would also include a total of 164 short- and long-term bicycle parking spaces to meet the Los Angeles Municipal Code (LAMC) requirements for the proposed commercial land uses, as shown in **Table A-4**, below. The 44 short-term bicycle parking spaces would be located from the passageway that connects to the lobby, all of the ground floor uses, and elevator to the upper floors. The 120 long-term bicycle parking spaces would be located on the ground floor, also accessible from the passageway.

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<sup>12</sup> Los Angeles Department of City Planning. Mobility Plan 2035, An Element of the General Plan. Adopted September 7, 2016.

<sup>13</sup> Ibid.

**Table A-3  
Vehicle Parking**

Use	LAMC 12.21.A.4	Spaces Required	Spaces Proposed
<b>Institution/ Museum</b> (7,800 sf)	2 per 1,000 sf LAMC 12.21.A.4.(d) (Existing to remain)	16 (replaces 16 existing spaces)	16 (replaces 16 existing spaces)
<b>Commercial - retail/restaurant/office/ common</b> (281,403 sf)	2 per 1,000 sf LAMC 12.21.A.4.(x) (State Enterprise Zone)	579	579
<b>Total</b>		<b>579</b>	<b>579</b>
Reduced Number of Vehicles per Bicycle Replacement <sup>1</sup>			-41
Total after Bicycle Replacement			538
<sup>1</sup> Per the City of Los Angeles Bicycle Parking Ordinance (CF-12-1297-S1), Off-Street Automobile Parking Requirements, new or existing automobile parking spaces required by Code, for all land uses, may be replaced by bicycle parking at a ratio of one automobile parking space for every four bicycle parking spaces provided. No more than 20 percent of the required automobile parking spaces for nonresidential uses shall be replaced at a site.			

**Table A-4  
Bicycle Parking**

Use	Spaces Required LAMC Section 12.21.A.16			Spaces Proposed		
	Short-term	Long-term	Total	Short-term	Long-term	Total
<b>Office</b> (255,387sf)	26 (1/10,000 sf)	52 (1/5,000 sf)	<b>78</b>	26	52	<b>78</b>
<b>Retail/ Restaurant</b> (14,995 sf)	14 (1/2,000 sf or 2 per shop)	14 (1/2,000 sf or 2 per shop)	<b>28</b>	14	14	<b>28</b>
<b>Institution/ Museum</b> (7,800 sf)	0 (Existing use to remain. None required.)			0	0	<b>0</b>
Additional bicycle parking spaces to allow for parking reduction of 15 additional vehicles (at ratio of 4 bicycle:1 vehicle spaces); for a total of 41 reduced vehicles.				4	54	<b>58</b>
<b>Total</b>	<b>40</b>	<b>66</b>	<b>106</b>	<b>44</b>	<b>120</b>	<b>164</b>

### ***Proposed Design and Architecture***

The Project includes the retention of a single-story, bow-truss, warehouse structure that has been renovated and repurposed and is currently occupied by the A+D Museum. The remainder of the Property would be redeveloped to include construction of a new 11-story office building. Formally, the building would be split into two roughly equal parts: an industrial base and a modern upper section. The industrial base would have a rough concrete finish and minimal, utilitarian detailing. On the street, retail openings would have large bi-fold doors below a continuous transom. On the parking levels above, steel window frames would be set into the openings with a limited percentage of translucent glass. Hinged doors would be set at either end

of the passage that links Hewitt and Colyton Streets and would mark the main entry to the new building. Inside the new building passage, the lobby would be an indoor/outdoor space anchored by ground floor commercial spaces on Hewitt Street, and the A+D Museum and a landscaped courtyard on Colyton Street. In the upper section, large, sliding glass panels would lead out onto a variety of outdoor spaces on every level, reinforcing the indoor/outdoor concept throughout the building.

The Project would provide multiple pedestrian entrances to the commercial uses, and bicycle parking facilities would be provided. The Project would also offer a pedestrian passage through the Property and a plaza that would be publicly accessible from Colyton and Hewitt Streets.

### ***Recreation, Open Space, and Landscaping***

The Project would include several areas of open space. Although there are no open space requirements for commercial uses, the Project would include a landscaped outdoor plaza and landscaped passageway to provide pedestrian access between Colyton and Hewitt Streets. Proposed landscaping would comply with requirements of the LAMC and the City's Urban Forestry Division's requirements. The open space amenities would be made up of the outdoor public plaza on the ground floor, private balconies on the 5<sup>th</sup> through 11<sup>th</sup> floors, and a roof deck. The Project would also include landscaped areas comprised of a variety of trees and plants in the plaza and passageway, as well as in planters on the roof deck. Additionally, there are three existing street trees within the adjacent street right-of-way on 4<sup>th</sup> Street. They are currently young trees with diameters that range between three and six inches. Current Site Plans for the Project retain the three trees. However, during City and agency review of the Project, there is the potential for one or all three of these trees to be removed or relocated as necessary. This action would require the approval of a Tree Removal Permit by the Board of Public Works per the current standards of the Urban Forestry Division, which would be obtained prior to issuance of a Certificate of Occupancy.

### ***Site Security and Lighting***

Security provisions for the Project are as yet to be determined but may include security cameras and patrol by on-site security personnel during business hours. Lighting would include low-level exterior lights at the perimeter of the building, in the door openings above retail and service entries, and in the passage and the public courtyard adjacent to the A+D Museum on Colyton Street, as needed, for aesthetic, security, and wayfinding purposes. Lighting would comply with current energy standards and codes while providing appropriate light levels to accent signage, architectural features and landscape elements. Light sources would be shielded and/or directed toward Project Site areas to minimize light spill-over to neighboring buildings and the surrounding area. Additionally, new street and pedestrian lighting within the public right-of-way would provide appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties, in compliance with applicable City regulations and with approval by the Bureau of Street Lighting.

### ***Sustainability***

The Project's proximity to public transportation and growing density of residential units may reduce vehicle miles traveled (VMT) for residents and visitors. The Project would also encourage alternative transportation modes, such as bicycling. The Project would include 164 bicycle parking spaces conveniently located throughout the Project. The Project's infill location would also promote the concentration of development in an urban location with extensive infrastructure, which would reduce the Project's carbon footprint.

The Project has been designed to meet the Leadership in Energy and Environmental Design (LEED) Silver - Green Building Rating System standards to reduce energy consumption. The United States Green Building Council (USGBC) developed the LEED rating system to provide standards for environmentally sustainable construction. Sustainable building methods include energy conservation, water conservation, and waste reduction features. Specifically, the Project would incorporate, but not be limited to, the following features to support and promote environmental sustainability: a cool roof;<sup>14</sup> electric vehicle chargers; Energy Star appliances; and reduced water use, achieved by low-flow plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) that comply with the performance requirements specified in the City of Los Angeles Green Building Code, a weather-based irrigation system, and water-efficient landscaping.

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

## **Project Construction**

Construction of the Project would require the demolition of the existing one-story office and related garage/storage space (combined 6,030 sf) and Museum storage space (1,000 sf), as well as associated surface parking lots (approximately 39,751 sf). The Project would maintain the existing structure at the corner of 4<sup>th</sup> and Colyton Streets that is currently occupied by the A+D Museum. Construction of the Project is anticipated to begin in 2019 and would be completed in 2021.

## **Proposed Land Use and Zoning Designations**

The Applicant is requesting a General Plan Amendment, Vesting Zone Change, and Height District Change to construct and operate the Project. The General Plan Amendment would change the current land use designation from Heavy Industrial to Regional Center Commercial, which would permit a variety of commercial and residential uses. The Vesting Zone Change would change the current zone from M3 to C2, which would allow for the proposed range of commercial and art production uses. The Height District Change from Height District No. 1 to Height District No. 2 would permit an increased floor area ratio (FAR), from 1.5:1 to 6:1.

## **D. Requested Permits and Approvals**

The Project would require the following entitlements:

- Pursuant to Section 555 of the City Charter and LAMC Section 11.5.6, a General Plan Amendment for the Property to amend the adopted Central City North Community

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<sup>14</sup> A cool roof is a roofing system that delivers higher solar reflectance (the ability to reflect the visible, infrared and ultraviolet wavelengths of the sun, reducing heat transfer to the building) and higher thermal emittance (the ability to radiate absorbed, or non-reflected solar energy) than standard designed roofing products.

Plan's land use designation from the current "Heavy Industrial" land use designation to "Regional Center Commercial" land use designation;

- Pursuant to LAMC Section 12.32-Q, a Vesting Zone Change for the Property from the M3 zone to C2 zone;
- Pursuant to LAMC Section 12.32-F, a Height District Change for the Property from Height District No. 1 to Height District No. 2;
- Pursuant to LAMC Section 12.24-W,1, Master Conditional Use approval to permit the sale and dispensing of a full line of alcoholic beverages for on-site consumption for up to six establishments, for a total of up to 22,795 sf (made up of approximately 14,995 sf of new commercial space and 7,800 sf of the existing A+D Museum);
- Pursuant to LAMC Section 12.24-U,14, Conditional Use approval to permit a Major Development Project over 100,000 sf or more of floor area in non-residential uses in the C2 zone;
- Pursuant to LAMC Section 16.05, Site Plan Review approval for a development that results in an increase of 50,000 gross sf of non-residential floor area;
- Pursuant to LAMC Section 17.15, Vesting Tentative Tract Map to merge the existing lots and subdivide into 13 lots, including one master lot and 12 airspace lots;
- Pursuant to LAMC Section 12.37.I, a Waiver of Dedication and Improvement requirements; and
- Certification of an Environmental Impact Report.

The Project would also require additional approvals and permits from the City of Los Angeles Department of Building and Safety and Public Works (and other municipal agencies) for Project construction activities including, but not limited to the following: demolition, haul route, excavation, shoring, grading, foundation, building, and interior improvements, as well as the potential removal or relocation of up to three street trees currently located in the 4<sup>th</sup> Street right-of-way.

**Attachment B**  
**Explanation of Environmental Checklist**  
**Determinations**

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# INITIAL STUDY

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## Attachment B – Explanation of Environmental Checklist Determinations

The following evaluation provides substantiation for the Environmental Checklist determinations conveyed in the Initial Study.

### I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) §210099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” PRC Section 21099 defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21099 defines an “employment center project” as “a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an “infill site” as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This State law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA.”<sup>1</sup>

PRC Section 21099 applies to the Project (refer to **Figure B-1, Project Site Location within a Transit Priority Area**). Therefore, the Project is exempt from aesthetic impacts. The analysis in this initial study (or in the EIR, if any aesthetic impact discussion is included), is for **informational purposes only** and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this initial study (or the EIR) is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this initial study (or the EIR) shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

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<sup>1</sup> City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Available at: <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>. Accessed Dec. 2, 2016.



Aerial Source: GoogleEarth Pro, Oct. 18, 2016.

4TH AND HEWITT PROJECT

# Project Site Location within a Transit Priority Area





## Would the project:

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

**No Impact.** A significant impact may occur if a project would have a substantial adverse effect on a scenic vista. The Project Site is located within an urban area southeast of Downtown Los Angeles. Although the City General Plan and Central City North Community Plan do not clearly define what views are considered “scenic vistas,” the City’s Mobility Plan 2035 indicates that one of the scenic features taken into consideration when designating scenic highways includes “city views,”<sup>2</sup> which suggests that the City has assigned value to such views. Therefore, for purposes of this analysis, the Downtown Los Angeles skyline is considered a scenic resource and views of it are considered scenic vistas. This skyline is visible from several observation points throughout the City and beyond its boundaries. The immediate existing visual context of the Project and immediately surrounding area include buildings that vary in height between one and eight stories. Longer distance, public views of high-rise buildings in Downtown Los Angeles to the northwest of the Project Site are also available from the Project area, specifically from portions of 4<sup>th</sup> Street, the 4<sup>th</sup> Street Bridge, Alameda Street, and Hewitt Street near the Arts District Park.

The Project would develop an 11-story building on a site that is currently comprised of one-story buildings and surface parking lots. The proposed structure would rise to a maximum height of 190 feet above grade, thereby increasing the height and density of development on the Project Site. However, the Project is designed to reflect the character of the Arts District, with its industrial, modern, and utilitarian design, which is described in greater detail in the response to Question I.c, below. Public views of the Downtown Los Angeles skyline would continue to be visible from the Project area following construction of the Project, and the Project would contribute to the urban character of these views.

Pursuant to SB 743 and ZI 2452, the Project would result in no impact to scenic vistas.

Notwithstanding the above and the exemption of the Project from aesthetic impacts under SB 743, the EIR will include a discussion of the Project’s impacts under the City thresholds for informational purposes only. The impact conclusion for aesthetics is no impact.

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

**No Impact.** A significant impact may occur if a project would substantially damage scenic resources within a state scenic highway. The Project Site is not located within a State-designated, nor City-designated, scenic highway or associated view corridor.<sup>3</sup> Pursuant to SB 743 and ZI 2452, the Project would result in no impact to scenic resources.

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<sup>2</sup> Los Angeles Department of City Planning. Mobility Plan 2035, An Element of the General Plan. Adopted September 7, 2016.

<sup>3</sup> 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/gn/pln/transelt/TEMaps/E\\_Scnc.gif](http://cityplanning.lacity.org/cwd/gn/pln/transelt/TEMaps/E_Scnc.gif). Accessed Dec. 2, 2016.

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

**No Impact.** A significant impact may occur if a project would substantially degrade the existing visual character or quality of the site and its surroundings. The Project would replace existing surface parking lots and three, one-story structures with a mixed-use, 11-story building. The A+D Museum would remain in its current location. The proposed building would rise to a maximum height of 190 feet above grade, and the Project would include new office, retail, and food and beverage commercial uses. The proposed land uses would complement existing land uses in the immediate area, which more recently have evolved to include office spaces, retail shops, galleries, studios, museums, restaurants, and bars, in addition to live/work spaces. While the Project would modify the existing visual character of the Project Site and its surroundings by increasing the height and density of on-site development, it is designed to reflect the character of the Arts District. Specifically, the base of the proposed building is industrial and utilitarian in its design. It includes features that make the building reminiscent of an industrial warehouse structure typical of the Arts District, such as bi-fold doors that lead into the Project's retail uses on the street level and hinged doors set at either end of the passageway that links Hewitt and Colyton Streets. In addition, the above-ground parking levels would be screened from public view by small steel window frames that would be set into the openings with a limited percentage of translucent glass. The upper section of the building would include a more modern design, including larger steel window frames than the parking levels, which visually separate the upper office levels from the retail and parking levels below it. In addition, the façade of some surfaces of the proposed building would be painted with large graphics or murals, to further incorporate the Arts District's character. With regard to the height of the proposed building, more recent developments in the Arts District include increased height and density compared to the land uses they replaced. For example, the Barker Lofts project, located southeast of the Project Site at 5<sup>th</sup> and Hewitt Streets, is four stories in height, a six story multi-unit residential building is located northwest of the Project Site at 4<sup>th</sup> and Seaton Streets, and an eight-level parking garage is currently under construction northeast of the Project Site at 4<sup>th</sup> Place and Hewitt Street.

Pursuant to SB 743 and ZI 2452, the Project would result in no impact to visual character or quality.

Notwithstanding the above and the exemption of the Project from aesthetic impacts under SB 743, the EIR will include a discussion of the Project's impacts under the City thresholds for informational purposes only. The impact conclusion for aesthetics is no impact.

With regard to shade and shadow effects, shading impacts are influenced by the height and bulk of a structure, time of year, duration of shading during the day, and the proximity of shade-sensitive land uses, or receptors. The immediate Project vicinity is characterized by a number of low- and medium-density adaptive re-use and industrial uses.

Pursuant to SB 743 and ZI 2452, the Project would result in no impact to shading.

Notwithstanding the above and the exemption of the Project from aesthetic impacts under SB 743, the EIR will include a discussion of the Project's impacts under the City thresholds for informational purposes only. The impact conclusion for aesthetics is no impact.

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

**No Impact.** A significant impact may occur if a project would create a new source of light or glare which would adversely affect daytime or nighttime views in the area. The Project Site is located within an urban area southeast of Downtown Los Angeles that is characterized by urban nighttime artificial light levels. Due to limited on-site development, current Project Site land uses generate lower levels of interior and exterior lighting based on the existing relatively low-density one-story structures (specifically, the A+D Museum and office space). Additional night lighting is generated by surrounding land uses, street lights and vehicle head lights along 4<sup>th</sup> Street, Hewitt Street, and Colyton Street, as well as from the Project Site's surface parking lots. Sources of glare from existing Project Site land uses include limited glass windows and metal surfaces of vehicles.

The Project Site is located along an industrial and commercial corridor. The land uses immediately surrounding the Project Site consist of a mix of low intensity industrial and manufacturing warehouses, an array of commercial uses of varied intensities, and live/work and residential uses. Based on the City of Los Angeles CEQA Thresholds Guide, land uses that may be sensitive receptors for nighttime illumination include residential uses and some commercial uses.<sup>4</sup> In addition, motorists may be sensitive receptors to glare effects, which may interfere with visibility.

The Project is anticipated to increase light levels over existing conditions as a result of increased density and height associated with architectural lighting, security lighting, interior lighting, and outdoor illumination of the passageway/paseo. However, the Project's exterior lighting would be directed downwards, directed towards the interior of the Project site, and/or would be shielded to reduce spillover onto adjacent land uses. The Project would also comply with the requirements of the LAMC. Specifically, the Project would comply with the following sections and lighting provisions of the LAMC:

- Chapter 9, Article 3, Section 93.0117: No person shall construct, establish, create, or maintain any stationary exterior light source that may cause the following locations to be either illuminated by more than two foot candles (21.5 lx) of lighting intensity or receive direct glare from the light source: exterior glazed windows or sliding glass doors on any other property containing residences; any elevated habitable porch, deck, or balcony on any other property containing residences; or any ground surface intended for use but not limited to recreation, barbecue, or lawn areas or any other property containing residences.
- Chapter 1, Article 2, Sec. 12.21 A5(k): All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any street and any adjacent premises.
- Chapter 1, Article 4.4, Sec. 14.4.4D(E): No sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than three foot candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

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<sup>4</sup> City of Los Angeles. 2006. L.A. CEQA Thresholds Guide: Your Resources for Preparing CEQA Analyses in Los Angeles.

The Project's proposed structure is modern in its architectural style. The design of the proposed building includes an industrial base and a modern upper section. In addition to new sources of light, the Project would introduce new building surface materials to the Project Site, including glass, concrete, and metal materials. As the Project proposes multiple levels of windows and would utilize steel, the Project has the potential to generate glare. However, non-reflective glass, or glass surfaces treated with non-reflective coatings, would be utilized for windows and surfaces facing the exterior. Metal materials would be utilized as accents, mainly to frame windows, and would not cover a substantial area of the building's exterior. As the above-ground levels of the Project's parking garage would be screened, the Project would not generate glare from the metal surfaces of parked cars.

Pursuant to SB 743 and ZI 2452, the Project would result in no impact to light and glare.

Notwithstanding the above and the exemption of the Project from aesthetic impacts under SB 743, the EIR will include a discussion of the Project's impacts under the City thresholds for informational purposes only. The impact conclusion for aesthetics is no impact.

## 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.** A significant impact may occur if a project would convert designated Farmland to non-agricultural use. The Project Site is located within Downtown Los Angeles and has been developed for decades with warehouses, office and commercial uses, associated garage and storage spaces, and surface parking lots. No agricultural uses or related operations are present on the Project Site or in the surrounding urban area. The Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.<sup>5</sup> Therefore, no impact would occur and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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<sup>5</sup> 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 September 29, 2016.

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

**No Impact.** A significant impact may occur if a project would conflict with existing zoning for agricultural use, or a Williamson Act contract. The Project Site has a land use designation of Heavy Industrial on the Central City North Community Plan General Plan Land Use Map with a corresponding zone of M3. The Project Site is zoned M3-1-RIO (Heavy Industrial, Height District 1, River Improvement Overlay District). The Project Site and nearby properties are not zoned for agricultural use, nor are they under a Williamson Act contract.<sup>6</sup> The Project would not conflict with existing zoning for agricultural uses or a Williamson Act contract. Therefore, no impact would occur and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

**No Impact.** A significant impact may occur if a project would conflict with existing zoning for, or cause rezoning of, forest land or timberland zoned Timberland Production. 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 a one-story office building and related garage/storage space, Museum storage space, and surface parking lots. Consistent with the urban Project Site, the immediate Project areas are also zoned for industrial and manufacturing uses. No forest land or land zoned or designated as timberland or for timberland production by the City of Los Angeles General Plan or Central City North Community Plan is present on the Project Site or surrounding area. Public forest land in Los Angeles County is limited primarily to the Angeles National Forest and a small portion of the Los Padres National Forest. Other areas of forest land outside of National Forests in Los Angeles County consist primarily of small areas in the Santa Monica Mountains, Sierra Pelona Mountains, and areas of the San Gabriel Mountains adjacent to the Angeles National Forest. The Project Site is not located in these areas. Further, as there are no substantial areas of privately-owned forest land in Los Angeles County, there are no timberland or timberland production areas.<sup>7</sup> Therefore, the Project would not conflict with existing zoning for forest land or timberland. No impact would occur and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

**No Impact.** A significant impact may occur if a project would result in the loss of forest land or conversion of forest land to non-forest use. The Project Site consists of developed office and commercial spaces, and no forest land exists in the Project vicinity. The Project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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<sup>6</sup> 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](ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf). Accessed on September 29, 2016.

<sup>7</sup> County of Los Angeles Department of Regional Planning. Los Angeles County General Plan Update Draft Environmental Impact Report. State Clearinghouse # 2011081042. June 2014.

- 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.** A significant impact may occur if a project would involve other changes in the existing environment that would result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. No agricultural uses or associated operations occur on or in the vicinity of the Project Site. Therefore, the Project would not involve the conversion of farmland to other uses, either directly or indirectly. No impact would occur and no mitigation measures are required. No further analysis of this topic in the EIR is required.

### **III. AIR QUALITY**

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

The air quality management district for the proposed Project is the South Coast Air Quality Management District (SCAQMD); therefore, significance criteria of the SCAQMD will apply to the Project.

#### **Would the project:**

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

**Potentially Significant Impact.** A significant impact may occur if a project would be inconsistent with the applicable air quality management plan (AQMP) or interfere with implementation of the AQMP. The Project Site is under the jurisdiction of the SCAQMD, which, with the California Air Resources Board (CARB) and Southern California Association of Governments (SCAG), is responsible for developing an AQMP to address updates to air quality standards and attainment deadlines. The Final 2016 AQMP was adopted March 2017 by the SCAQMD.<sup>8</sup> The Congestion Management Program (CMP) is a State-mandated program, which was enacted by the State legislature to address the effects of urban congestion on local communities and the region. The Los Angeles County Metropolitan Transportation Authority (Metro) implements the CMP in the City. The Project would be located in a City-designated TPA and would also locate new development in proximity to existing public transit facilities, including Metro rail stations and various bus stops, as well as redevelop a Project Site already served by existing infrastructure. Notwithstanding these attributes that may reduce Project-related emissions, the Project has the potential to increase the amount of traffic in the area, which would consequently generate operational air emissions that could potentially affect implementation of the AQMP, as well as conflict with the CMP. 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. Potential Project conflicts with the CMP are further addressed in Response to Checklist Question XVI.b, Transportation/Traffic, below.

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

**Potentially Significant Impact.** A significant impact may occur if a project's emissions would exceed established standards or contribute substantially to an existing or projected air quality violation. The Project Site is located within the South Coast Air Basin (SCAB), in which State

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<sup>8</sup> SCAQMD. Final 2016 AQMP. March 2017.

and Federal air quality standards are often exceeded in many parts, including Los Angeles County. The SCAB is currently in non-attainment of Federal and State air quality standards for ozone (O<sub>3</sub>) and particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>).<sup>9</sup> The Project would result in increased air emissions associated with construction and operational traffic, as well as equipment. 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 project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?***

**Potentially Significant Impact.** A significant impact may occur if a project would result in a cumulatively considerable net increase of a federal or State non-attainment criteria pollutant. 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 SCAB, an air quality management area that is in non-attainment for Federal and State air quality standards for O<sub>3</sub> and PM<sub>2.5</sub>. Therefore, 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.** A significant impact may occur if a project would generate pollutants in such quantities that they would adversely affect sensitive receptors. While the Project would be located in an urbanized area of Los Angeles, the Project vicinity includes a mix of uses, such as residential, school, and other sensitive uses. For example, multi-family residential land uses are located near the intersection of East 4<sup>th</sup> Street and Seaton Street, approximately 160 feet northwest of the Project Site, as well as at the intersection of South Hewitt Street and East 5<sup>th</sup> Street, approximately 400 feet southeast of the Project Site. The Arts District Park is also located 415 feet south of the Project Site. In addition, the Arts District Dog Park is located approximately 375 feet east of the Project Site. Additional sensitive receptor locations, if present, will be investigated and described in the EIR. Construction activities and operation of the Project could potentially increase air emissions above current levels, thereby potentially affecting sensitive receptors. Therefore, this topic will be analyzed further in the EIR.

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

**Less Than Significant Impact.** A significant impact may occur if a project would create objectionable odors affecting a substantial number of people. Objectionable odors are typically associated with manufacturing, industrial, or sewage treatment processes. The Project involves a mixed-commercial development that includes retail and office uses that do not typically create objectionable odors. During construction and operation of the Project, trash receptacles would be provided and covered and properly maintained in order to control odors. Therefore, impacts would be less than significant and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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<sup>9</sup> Ibid.

## 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.** A significant impact may occur if a project would remove, or modify the habitat of, any identified candidate, sensitive, or special status species. The Project Site is located in an urban area and is currently developed with the A+D Museum, Museum storage space, a one-story office building and associated garage/storage space, and surface parking lots. Based on an evaluation provided by Rios Clementi Hale Studies and the Existing Tree Plan prepared for the Project (provided in **Appendix IS-1, Biological Resources**), no trees are present within the Project Site. Three street trees (Brisbane box trees, or *Tristania conferta*) are located within the 4<sup>th</sup> Street right-of-way, north of the Project Site. These trees are not native species and are not protected trees [as defined by the Los Angeles Municipal Code (LAMC) Section 17.02]<sup>10</sup>. Current Site Plans for the Project retain the three trees. However, during City and agency review of the Project, there is the potential for one or all three of these trees to be removed or relocated as necessary. This action would require the approval of a Tree Removal Permit by the Board of Public Works per the current standards of the Urban Forestry Division, which would be obtained prior to issuance of a Certificate of Occupancy. Due to the urban and developed nature of the Project Site and vicinity, the Project Site does not support habitat for candidate, sensitive, or special status species. No impact would occur and no mitigation measures are required. No further analysis of this topic in the 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.** A significant impact may occur if a project would have a substantial adverse effect on any identified riparian habitat or other sensitive natural community. The Project Site is located in an urban area that does not contain a natural drainage channel 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 within the City of Los Angeles.<sup>11</sup> Therefore, the Project would not have an adverse effect on any riparian habitat or other sensitive natural community. No impact would occur and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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<sup>10</sup> Pursuant to Ordinance No. 177404, Section 17.02 of the LAMC defines a “protected tree” as any of the following native Southern California Tree Species, measuring four inches or more in cumulative diameter at four and one-half feet above ground level at the base of the tree: Oak (Valley Oak and California Live Oak, as well as other trees of the oak genus that are indigenous to California, but excluding Scrub Oak), Southern California Black Walnut, Western Sycamore, and California Bay.

<sup>11</sup> County of Los Angeles Department of Regional Planning, General Plan Figure 9.3, Significant Ecological Areas and Coastal Resource Areas Policy Map, Figure 9.3. February 2015. Available at: [http://planning.lacounty.gov/assets/upl/project/gp\\_2035\\_2014-FIG\\_9-3\\_significant\\_ecological\\_areas.pdf](http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf). Accessed December 2016.



- 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.** A significant impact may occur if a project would remove or modify federally protected wetlands through direct removal, filling, hydrological interruption, or other means. The Project Site is developed with the existing A+D Museum, office uses, associated garage and storage spaces, and surface parking lots. The surrounding area is fully developed with urban land uses as well. The Project Site does not contain wetlands as defined by Section 404 of the Clean Water Act. Therefore, the Project would not have an adverse effect on Federally protected wetlands. No impact would occur and no mitigation measures are required. No further analysis of this topic in the 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?***

**Less Than Significant Impact.** A significant impact may occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. As stated in the response to Checklist Question IV.a, the Project Site is currently developed with the A+D Museum, Museum storage space, a one-story office building and related garage/storage space, and surface parking lots. Due to the developed nature of the Project Site and surrounding area, the Project Site and vicinity do not support a migratory wildlife corridor or native wildlife nursery site. However, three trees are located in the 4<sup>th</sup> Street right-of-way adjacent to the Project Site. These trees may potentially provide suitable nesting habitat for migratory birds, which are protected by the Federal Migratory Bird Treaty Act (MBTA) of 1918 and the California Fish and Game Code. The MBTA is included in Title 16, Chapter 7, Subchapter II, Sections 703-712 of the United States Code (U.S.C.) (16 U.S.C. 703-712). It is enforced by the USFWS and protects the migratory nongame native bird species listed in the Code of Federal Regulations (CFR) Chapter 50, Section 10.13 and their nests. Sections 3503, 3503.5, and 3513 of the California Fish and Game Code also prohibit take of all birds and their active nests, including raptors and other migratory nongame birds listed under the MBTA. According to Section 86 of the 2015 California Fish and Game Code, "Take means hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

In accordance with the Migratory Bird Treaty Act, tree removal activities would take place outside of the nesting season (February 15–September 15), if and to the extent feasible. To the extent that vegetation removal activities must occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a 300-foot buffer (500 feet for raptors) would be established until the fledglings have left the nest. As the Project would be required to comply with existing Federal and State laws that protect the migratory bird species that may potentially utilize trees in the Project vicinity for nesting habitat, impacts would be less than significant. Therefore, through compliance with existing regulations, impacts would be less than significant and no mitigation measures are required. No further analysis of this topic in the 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.** A significant impact may occur if a project would be inconsistent with local policies or ordinances pertaining to the protection of biological resources. As stated in the

response to Checklist Question IV.a, the Project Site is comprised of previously developed parcels within an urban community. There are no trees within the Project Site. Three street trees are located in the adjacent 4<sup>th</sup> Street right-of-way; however, the tree species is not a locally protected biological resource, and they do not meet the 8-inch diameter requirement to be considered significant non-protected trees (the trees are three, five, and six inches in diameter) per the City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC).

The current Site Plans for the Project retain the three 4<sup>th</sup> Street trees in place and include additional landscaping. However, as part of City and agency review of the Project, there is the potential for one or all of these trees to be removed or relocated as necessary. This action would require the approval of a Tree Removal Permit by the Board of Public Works per the current standards of the Urban Forestry Division and would be required prior to issuance of a Certificate of Occupancy. Review and approval of the Tree Removal Permit would ensure that street trees are replaced in accordance with City policy. Other landscaping would comply with 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. Impacts would be less than significant and no mitigation measures are required. No further analysis of this topic in the 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.** A significant impact may occur if a project would be inconsistent with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The Project is not part of a Habitat Conservation Plan (HCP) or other approved regional or State habitat conservation plan.<sup>12</sup> As explained in City's Mobility Plan EIR, there are no HCPs, or Natural Community Conservation Plans (NCCPs), applicable to the City.<sup>13</sup> Therefore, the Project would not conflict with the provisions of an adopted local, regional, or State conservation plan. No impact would occur and no mitigation measures are required. No further analysis of this topic in the EIR is required.

## **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 significant impact may occur if a project would remove or cause a substantial adverse change in the significance of a historical resource. Historical resources are defined in Section 15064.5 of the State CEQA Guidelines as:

- Resources listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources;
- Resources included in a local register of historical resources; and/or

<sup>12</sup> California Department of Fish and Wildlife, California Regional Conservation Plans, August 2015. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>. Accessed December 5, 2016.

<sup>13</sup> City of Los Angeles Mobility Plan 2035, Draft Environmental Impact Report, pg. 4.6-5. Available at: [http://planning.lacity.org/eir/MobilityPlan/DEIR/assets/4.6\\_biological\\_resources.pdf](http://planning.lacity.org/eir/MobilityPlan/DEIR/assets/4.6_biological_resources.pdf). Accessed Dec. 5, 2016.

- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

Resources are also considered historically significant under CEQA if they meet the criteria for listing on the California Register of Historical Resources, which include resources that are:

- Associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Associated with the lives of persons important in our past;
- The embodiment of distinctive characteristics of types, periods, regions, or methods of construction, or representative of the work of an important creative individual; or possessive of high artistic values; and/or
- Yield, or may likely yield, information important in prehistory or history.

Based on City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS), two of the four structures that currently occupy the Project Site were constructed in approximately 1947 (structure at 414 Colyton Street) and 1952 (900 East 4<sup>th</sup> Street, the A+D Museum).<sup>14</sup> ZIMAS does not include years of construction for the remaining two structures on the Project Site. However, as there are at least two structures on the Project that are over 45 years in age and may qualify as historical resources, there is a potential for the Project to have significant impacts on historical resources. Therefore, potential impacts to historical resources will be further analyzed in the EIR.

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

**Potentially Significant Impact.** A significant impact may occur if a project would cause a substantial adverse change in the significance of an archaeological resource. According to the State CEQA Guidelines, an archaeological resource is any resource that has yielded, or may be likely to yield, information important in prehistory or history [Section 15064.5(a)(3)(D)]. As the Project Site is developed, once-present surficial archaeological resources, if any, were likely disturbed by previous grading and preparation activities. However, Project construction would require grading and excavation activities for building foundations and subterranean parking. Such activity could have the potential to disturb existing but as yet undiscovered archaeological resources, and therefore this topic will be further analyzed in the EIR.

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

**Potentially Significant Impact.** A significant impact may occur if a project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Although the Project Site has been previously graded, developed, and paved, and no unique geologic features are anticipated to be encountered during Project development, the Project would require grading and excavation for building foundations and subterranean parking. Excavation for the Project's subterranean parking levels may potentially uncover previously

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<sup>14</sup> City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS). Available at: <http://zimas.lacity.org>. Accessed on June 9, 2017. Addresses provided are based on ZIMAS data.

undiscovered paleontological resources. Therefore, this topic will be analyzed further in the EIR.

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

**Potentially Significant Impact.** A significant impact may occur if a project would disturb previously interred human remains. As previously indicated, the Project Site has been previously developed. However, excavation for subterranean parking and building foundations would extend further beneath the surface than previous developments on the Project Site. Therefore, Project development activities may potentially encounter previously undiscovered human remains during excavation activities. This topic will be analyzed further in the EIR.

## **VI. GEOLOGY AND SOILS**

In 2015, the California Supreme Court in *CBIA v. BAAQMD*<sup>15</sup>, 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.

In accordance with Appendix G of the State CEQA Guidelines and the *CBIA v. BAAQMD* decision, the project would have a significant impact related to geology and soils if it results in any of the following impacts to future residents or users:

- a) *Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving;***
- i) *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of existing environmental conditions. Refer to Division of Mines and Geology Special Publication 42.***

**Potentially Significant Impact.** A significant impact may occur if a project would expose people or structures to potential substantial adverse effects involving the rupture of known earthquake faults, caused in whole or in part by the project's exacerbation of existing environmental conditions. According to the City of Los Angeles General Plan Safety Element, the Alquist-Priolo Act requires the State Geologist to map active earthquake fault zones, or those faults that are typically above-ground, visible faults, such as the San Andreas Fault. However, unmapped faults, including blind thrust faults like that which caused the Northridge earthquake in 1994, are increasingly becoming an area of study.<sup>16</sup> The Project Site is not located with an Alquist-Priolo Earthquake Fault Zone; however, the closest fault to the Project

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<sup>15</sup> *California Building Industry Association (CBIA) v. Bay Area Air Quality Management District (BAAQMD)*.

<sup>16</sup> City of Los Angeles, Department of City Planning. 1996. Safety Element of the Los Angeles City General Plan. Adopted November 26.

Site is the Puente Hills Blind Thrust, located over one kilometer (1.1 miles) away.<sup>17</sup> Given that the Project Site is located within the seismically active Southern California region, potential impacts associated with fault rupture will be evaluated further in a geotechnical engineering investigation for the Project as well as analyzed in the EIR.

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

**Potentially Significant Impact.** A significant impact may occur if a project would expose people or structures to potential substantial adverse effects involving strong seismic ground shaking, caused in whole or in part by the project's exacerbation of existing environmental conditions. The Project Site is located within the seismically active Southern California region. The Project would be required to conform to California and City Building Code seismic design provisions, which include design standards for structural loads and materials to provide for the most recent advancements in earthquake safety. Nonetheless, as the Project Site is located in a seismically active region, potential impacts associated with ground shaking will be analyzed further in the EIR.

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

**Potentially Significant Impact.** A significant impact may occur if a project would expose people or structures to potential substantial adverse effects involving seismic-related ground failure, including liquefaction caused in whole or in part by the project's exacerbation of existing environmental conditions. According to the City's General Plan Safety Element, the Project Site is not located in a City-designated liquefaction zone.<sup>18</sup> However, the Project entails excavation to construct subterranean parking levels, which may potentially uncover hazardous geological conditions. As the Project Site may be subject to potentially high levels of seismic activity, potential impacts associated with seismic-related ground failure, including liquefaction, will be evaluated further in a geotechnical engineering investigation for the Project as well as analyzed in the EIR.

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

**No Impact.** A significant impact may occur if a project would expose people or structures to potential substantial adverse effects involving areas that are susceptible to landslides, such as hillside areas, caused in whole or in part by the project's exacerbation of existing environmental conditions. The Project Site is not located within a City-designated Hillside Area,<sup>19</sup> is not subject to the City's Baseline Hillside Ordinance,<sup>20</sup> and is not located in a City-designated Landslide area.<sup>21</sup> Additionally, the Project Site is located on the eastern edge of Downtown Los Angeles, not in close proximity to mountains or steep slopes, and there is a general lack of elevation

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<sup>17</sup> City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS), Parcel Profile Report: 926 E 4th St. Generated December 5, 2016.

<sup>18</sup> City of Los Angeles, Department of City Planning. 1996. Safety Element of the Los Angeles City General Plan. Adopted November 26.

<sup>19</sup> Ibid.

<sup>20</sup> City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS), Parcel Profile Report: 926 E 4<sup>th</sup> St. Generated December 5, 2016.

<sup>21</sup> City of Los Angeles, Department of City Planning. 1996. Safety Element of the Los Angeles City General Plan. Adopted November 26.

difference across or adjacent to the Site.<sup>22</sup> Therefore, the potential for landslides to occur on or near the Project Site is unlikely. The Project would not exacerbate existing hazardous environmental conditions and expose people or structures to substantial adverse effects involving landslides. No impact would occur and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

- 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.** A significant impact may occur if a project would expose people or structures to potential substantial adverse effects due to its location on unstable geologic units or soils, caused in whole or in part by the project's exacerbation of existing environmental conditions. As previously discussed in response to Checklist Questions VI.a.iii and a.iv, liquefaction hazards will be evaluated in the EIR and landslide hazards were concluded to have no impact. Lateral spreads are a type of landslide that occur on very gentle slopes or flat terrain. Ground failure in these cases are typically caused by liquefaction, and the failure is usually triggered by rapid ground motion, such as an earthquake.<sup>23</sup> Soils underlying the Project Site are not anticipated to be capable of liquefaction and lateral spreading is not anticipated to occur on the Project Site. Nonetheless, potential impacts associated with liquefaction and lateral spreading will be evaluated in the EIR with other geologic conditions addressed by a geotechnical engineering investigation.

Subsidence is a gradual settling or sudden sinking of the earth's surface, resulting from subsurface movement of earth materials. Typical causes of subsidence include aquifer-system compaction; drainage and decomposition of organic soils; underground mining, oil, and gas extraction; hydrocompaction, natural compaction; and sinkholes.<sup>24</sup> Subsidence is a type of ground failure that may range from local collapses to regional lowering of the earth's surface.<sup>25</sup> No oil wells are located on the Project Site;<sup>26</sup> however, the Project is located in the vicinity of the Union Station Oil Field.<sup>27</sup> As the Project entails excavation to construct subterranean parking levels, and the Project Site may be subject to potentially high levels of seismic activity, potential impacts associated with subsidence and local collapse will be evaluated in the EIR.

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<sup>22</sup> Google Earth. 900 E. 4<sup>th</sup> Street, Los Angeles, California. Imagery Date: October 18, 2016. Accessed on June 9, 2017.

<sup>23</sup> USGS. Landslide Types and Processes. Available at: <https://pubs.usgs.gov/fs/2004/3072/fs-2004-3072.html>. Accessed on December 30, 2016.

<sup>24</sup> USGS, California Water Science Center. Land Subsidence in California. Available at: [https://ca.water.usgs.gov/land\\_subsidence/](https://ca.water.usgs.gov/land_subsidence/). Accessed on December 30, 2016.

<sup>25</sup> USGS, California Water Science Center. Land Subsidence in California. Available at: [https://ca.water.usgs.gov/land\\_subsidence/california-subsidence-cause-effect.html](https://ca.water.usgs.gov/land_subsidence/california-subsidence-cause-effect.html). Accessed on December 30, 2016.

<sup>26</sup> City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS), Parcel Profile Report: 926 E 4<sup>th</sup> St. Generated December 5, 2016.

<sup>27</sup> City of Los Angeles, Department of City Planning. 1996. Safety Element of the Los Angeles City General Plan. Adopted November 26.

- d) ***Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions.***

**Potentially Significant Impact.** A significant impact may occur if a project would expose people or structures to potential substantial adverse effects due to its location on expansive soil, caused in whole or in part by the project's exacerbation of existing environmental conditions. Expansive soils shrink or swell as the moisture content decreases or increases. Structures built on such soils may experience shifting, cracking, and breaking damage as the soils shrink and subside or expand.<sup>28</sup> A geotechnical engineering investigation shall be prepared for the Project and will address the potential of the Project to be located on expansive soils. Therefore, potential impacts associated with expansive soils will be analyzed further 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.** A significant impact may occur if project site soils would be incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater. The Project Site is located in an urban area with existing wastewater infrastructure. The Project would connect to existing sewer infrastructure and would not use septic tanks or alternative wastewater disposal systems. Therefore, no impact from the use of septic tanks or alternative wastewater disposal systems would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

## 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.** A significant impact may occur if construction or operation of a project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Construction and operational activities (mainly vehicular traffic) associated with the Project would increase greenhouse gas (GHG) emissions that have the potential to directly or indirectly result in a significant impact on the environment. 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.** A significant impact may occur if a project would be inconsistent with plans, policies or regulations adopted for the purpose of reducing greenhouse gases emissions. The Project would be required to comply with the City's Green Building Code pursuant to Chapter IX, Article 9, of the LAMC. In addition, the Project would be required to implement applicable energy conservation measures to reduce GHG emissions, such as those

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<sup>28</sup> USGS. Landslides Glossary. Available at: <http://landslides.usgs.gov/learn/glossary.php#e>. Accessed on December 30, 2016.

described in the California Global Warming Solutions Act of 2006 (or AB 32).<sup>29</sup> However, the GHG emissions associated with the Project have not yet been estimated. 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.

In accordance with Appendix G of the State CEQA Guidelines, the project would have a significant impact related to hazards and hazardous materials if it would:

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

**Potentially Significant Impact.** A significant impact may occur if a project would transport, use, or dispose of hazardous materials in such quantities or in a manner that would create a significant hazard to the public. Construction and operation of the Project would involve the temporary use of hazardous substances in the form of paints and other surface coatings, adhesives, cleaning agents, fuels, oils and pesticides. Such materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' specifications. The use of these materials is anticipated to be minimal. Due to the age of some of the on-site structures, Project demolition may also potentially uncover hazardous materials, such as asbestos containing materials<sup>30</sup> or lead based paints.<sup>31</sup> Therefore, the transport, use, and disposal of hazardous materials will be documented and 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.** A significant impact may occur if a project would release hazardous materials into the environment as a result of upset and accident conditions, thereby causing a hazard to the public or the environment. The Project Site is located within a City-designated Methane Zone.<sup>32</sup> In addition, structures that are planned to be demolished on-site may contain hazardous materials, based on their age, and as described above, if present,

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<sup>29</sup> CalEPA CARB. AB 32 Scoping Plan. Available at: <https://www.arb.ca.gov/cc/scopingplan/scopingplan.htm>. Accessed on December 30, 2016.

<sup>30</sup> Air Quality Management District. 2007. Rule 1403: Asbestos Emissions from Demolition/Renovation Activities. Amended October 2007.

<sup>31</sup> U.S. EPA. Real Estate Disclosure: Lead. Available at: <https://www.epa.gov/lead/real-estate-disclosure>. Accessed on June 9, 2017.

<sup>32</sup> City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS). Available at: <http://zimas.lacity.org>. Accessed on June 9, 2017.



asbestos containing materials and lead based paints would require remediation and abatement. A Phase I Environmental Site Assessment and Methane Study will be prepared for the Project to identify these and other hazards that may exist on the Project Site. 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.** A significant impact may occur if a project located within one-quarter mile of an existing or proposed school would emit hazardous emissions or acutely hazardous materials, substances, or waste into the environment. Although there are no existing or proposed public kindergarten through high schools located within a one-quarter mile of the Project Site,<sup>33</sup> private vocational and professional schools, including the Miyako Sushi and Washoku School and Southern California Institute of Architecture are located in the vicinity.<sup>34</sup> Construction of the Project, including emissions and potential handling and hauling of hazardous materials, may potentially impact such institutions. Therefore, this issue will be analyzed further in the EIR.

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

**Potentially Significant Impact.** A significant impact may occur if a project located on a designated hazardous materials site would exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment. Government Code Section 65962.5, amended in 1992, requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. Information regarding the Cortese List is now compiled by the Department of Toxic Substances Control (DTSC) (EnviroStor database), the State Water Board, and CalEPA. Based on a preliminary search of the EnviroStor database, no designated hazardous materials sites are located within 1,000 feet of the Project Site.<sup>35</sup> However, there may be hazardous environmental conditions on the Project Site that may be exacerbated by Project development and therefore may potentially pose a risk to the public or the environment. 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 result in a safety hazard for people residing or working in the project area?***

**No Impact.** A significant impact may occur if a project that is located within an airport land use plan area or within two miles of a public airport or public use airport would result in a safety hazard for people residing or working in the project area. The Project Site is not located within an airport land use plan area and it is not located within two miles of a public airport or public use airport.<sup>36</sup> The nearest airport to the Project Site is the Hawthorne Municipal Airport, which is

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<sup>33</sup> Google Earth 0.25-mile radius search (accessed December 5, 2016).

<sup>34</sup> Google Maps (accessed December 5, 2016).

<sup>35</sup> California Department of Toxic Substances Control, EnviroStor Database Search conducted December 5, 2016.

<sup>36</sup> Los Angeles County Airport Land Use Commission. 2004. Los Angeles County Airport Land Use Plan. Revised December 1.

located approximately 9.8 miles southwest of the Project Site.<sup>37</sup> Therefore, the Project would not result in an airport-related safety hazards for people residing or working in the Project vicinity. No impact would occur and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

**f) *For a project within the vicinity of a private airstrip would the project result in a safety hazard for people residing or working in the project area?***

**No Impact.** A significant impact may occur if a project that is located within the vicinity of a private airstrip would result in a safety hazard for people residing or working in the project area. 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.<sup>38</sup> Therefore, the Project would not result in airport-related safety hazards for the people residing or working in the area. No impact would occur and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

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

**Potentially Significant Impact.** A significant impact may occur if a project would be inconsistent with, or would physically interfere with implementation of, an adopted emergency response plan or emergency evacuation plan. The Project Site is served by existing roadway infrastructure and Selected Disaster Routes.<sup>39</sup> While the majority of short-term Project construction activities would be confined to the Project Site, such activities may temporarily affect roadways and access points during certain periods of the day. Where necessary, the Project would implement traffic control measures (e.g., construction flagmen, signage, etc.) to maintain adequate flow and access and to assure public safety. In accordance with City requirements, the Project would develop a Construction Traffic Control Plan, which may include the designation of a haul route to assure that 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 project driveways) from the streets that surround the Project Site. The Project would be required to provide adequate emergency access and comply with Los Angeles Fire Department (LAFD) access requirements. Subject to the review and approval of Site access and circulation plans by the LAFD, the Project would not impair implementation or physically interfere with adopted emergency response or emergency evacuation plans. However, to present a conservative analysis, potential impacts to emergency response and emergency evacuation plans will be further evaluated in the EIR.

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<sup>37</sup> Google Earth. 900 E. 4<sup>th</sup> Street, Los Angeles, California. Imagery Date: October 18, 2016. Accessed on June 13, 2017.

<sup>38</sup> City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS) Parcel Profile Report: 926 E 4<sup>th</sup> St. Generated December 5, 2016.

<sup>39</sup> City of Los Angeles, Department of City Planning. 1996. Safety Element of the Los Angeles City General Plan. Adopted November 26.

- h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands caused in whole or in part from the project's exacerbation of the existing environmental conditions.***

**No Impact.** A significant impact may occur if a project located in proximity to wildlands would exacerbate existing environmental conditions such that it would expose people or structures to a significant risk of loss, injury or death involving wildland fires. The Project Site is located in an urban area. No wildlands are present on the Project Site or surrounding area. Furthermore, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone.<sup>40</sup> As a proposed commercial retail and office building, the Project would not expose people or structures to a significant risk involving wildland fires or potential fires associated with industrialized areas. No impact would occur and no mitigation measures are required. No further evaluation of this topic in the EIR is required. It should be noted that the Project Site is located in a Selected Urban Fire and Secondary Hazards Industrialized Area.<sup>41</sup> Fire protection services will be evaluated in the EIR, which is described in Section XIV, Public Services, below.

## **IX. HYDROLOGY AND WATER QUALITY**

### **Would the project:**

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

**Potentially Significant Impact.** A significant impact may occur if a project would discharge water that does not meet the water quality standards or waste discharge requirements of the applicable regulatory agencies. The Project Site is currently comprised mainly of impervious surfaces, as it includes minimal vegetation and is developed with the A+D Museum, office space, associated storage and garage space, and surface parking lots. Construction of the Project would require earthwork activities, including excavation for subterranean parking and building foundations. During precipitation events especially, construction activities associated with the Project have the potential to result in minor soil erosion during grading and soil stockpiling and subsequent siltation, as well as other pollutants, may be conveyed into municipal storm drains. Construction dewatering may also be necessary due to the potential to encounter groundwater during excavation. The Project would be required to implement City of Los Angeles Low Impact Development (LID) standards, such as infiltration, capture and use, or biofiltration methods. However, 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, these are as yet to be determined, and, therefore, water quality impacts will be analyzed further in the EIR.

- 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)?***

**Potentially Significant Impact.** A significant impact may occur if a project would substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that

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<sup>40</sup> City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS). Available at: <http://zimas.lacity.org>. Accessed on June 9, 2017.

<sup>41</sup> City of Los Angeles, Department of City Planning. 1996. Safety Element of the Los Angeles City General Plan. Adopted November 26.

there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. The Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. Based on the demand and supply projections in the City's most current Urban Water Management Plan (UWMP), the LADWP will have an available water supply of roughly 611,800 acre-feet in 2020, with approximately 18 percent coming from local groundwater sources.<sup>42</sup> The Project does not propose groundwater withdrawal and currently impervious surfaces at the Project Site, including hardscape and surface parking lots, would be replaced by similar impervious surfaces and pervious landscaped areas, potentially resulting in a slightly increased, but negligible, rate of groundwater recharge. Therefore, this topic will be analyzed further 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.** A significant impact may occur if a project would substantially alter the existing drainage pattern of the site or area that results in substantial erosion or siltation on- or off-site. It is anticipated that construction of the Project would temporarily alter the existing drainage pattern of the Project Site and may result in siltation or erosion, especially during a rain event, and operation of the Project may also result in permanent changes to existing drainage patterns on the Project Site. 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.** A significant impact may occur if a project would result in a substantial increase in the rate or amount of surface runoff to such a degree that it causes flooding on- or off-site posing a hazard to life or property. Although the Project would not alter the course of a stream or river, Project development may temporarily alter drainage patterns on the Project Site and may change the rate and amount of surface runoff. Therefore, the potential for flooding 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.** A significant impact may occur if a project would increase the rate or amount of surface water runoff to such a degree that it exceeds the capacity of existing or planned stormwater drainage systems, or would provide substantial additional sources of polluted runoff. The Project Site is primarily covered with developed and impervious surfaces. Stormwater runoff currently flows into the City's storm drain system and also percolates to a limited extent into pervious surfaces. As described above, Project development may temporarily alter drainage patterns on the Project Site and may change the rate or amount of runoff water. Therefore, further evaluation to determine the potential for, and significance of,

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<sup>42</sup> 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, pg. ES-23.

Project impacts on water quality, as well as the capacity of the stormwater drainage system, will be analyzed in the EIR.

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

**Potentially Significant Impact.** A significant impact may occur if a project would substantially degrade water quality. Construction and operational best management practices (BMPs) that are implemented as part of a project's Stormwater Pollution Prevention Plan (SWPPP), the City's LID Ordinance, and Standard Urban Stormwater Mitigation Plan (SUSMP) are intended to limit sediment and hazardous substances from entering stormwater flows. However, as such plans have not yet been developed for the Project, water quality impacts will be analyzed further in the EIR.

**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?***

**No Impact (g-h).** A significant impact may occur if a project would place housing within a 100-year flood hazard area or would place within a 100-year flood hazard area structures which would impede or redirect flood flows. The Project Site is not located within a 100-year flood plain area,<sup>43</sup> including the 100-year flood zone designated by the Federal Emergency Management Agency (FEMA).<sup>44</sup> No impact would occur and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

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

**Potentially Significant Impact.** A significant impact may occur if a project would 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. The Project Site is not within a designated floodplain.<sup>45</sup> The Project is located approximately 0.35 miles west of the Los Angeles River. The course of the Los Angeles River within the City is channelized and contains existing flood control facilities that regulate flow volume to prevent flooding. However, the Project Site is located within the mapped potential inundation boundaries of the Hansen and Sepulveda Reservoirs. Therefore, the Project Site location within a potential inundation area will be further evaluated in the EIR.

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

**Potentially Significant Impact.** A significant impact may occur if a project would be located sufficiently close to an ocean or water body such that it may be exposed to risks associated with seismically-induced tidal phenomena (including seiche and tsunami) or if a project would be

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<sup>43</sup> City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit F – 100-Year & 500-Year Flood Plains in the City of Los Angeles. Available at: <http://cityplanning.lacity.org/cwd/gnlpln/safteyelt.pdf>. Accessed on December 5, 2016.

<sup>44</sup> Federal Emergency Management Agency, Flood Insurance Rate Map, Map Number 06037C1636F, Effective Date: September 26, 2008. Available at: <https://msc.fema.gov/portal/search?AddressQuery=926%204th%20street%2C%20los%20angeles%2C%20ca#searchresultsanchor>. Accessed on December 5, 2016.

<sup>45</sup> City of Los Angeles General Plan, Safety Element Exhibit G, Inundation & Tsunami Hazard Areas, March 1994. Available at: <http://cityplanning.lacity.org/cwd/gnlpln/safteyelt.pdf>. Accessed on December 5, 2016.

located in a hillside area and be exposed to risks associated with mudslides or mudflows. 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. As stated above, the Project Site is located within the mapped potential inundation boundaries of the Hansen and Sepulveda Reservoirs. As discussed above, the Project Site location within a potential inundation area, and therefore potential for inundation by seiche, will be further evaluated in the EIR.

A tsunami is a giant wave, commonly referred to as a tidal wave, produced by an earthquake or volcanic eruption under the sea.<sup>46</sup> 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 in a City-designated tsunami hazard area.<sup>47</sup> Project impacts related to inundation by tsunami would be less than significant and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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; therefore, there is little potential for inundation resulting from mudflow. Project impacts related to inundation by mudflow would be less than significant and no mitigation measures are required. No further analysis of this topic in the EIR is required.

## **X. LAND USE AND PLANNING**

### **Would the project:**

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

**No Impact.** A significant impact may occur if a project would be of a size or configuration that physically divides an established community. The Project Site is located within the Central City North Community Plan area in the City of Los Angeles and is currently developed with office and commercial uses as well as associated garage and storage spaces and surface parking lots. The Project vicinity is generally urbanized and built out with a variety of commercial and industrial uses. The Project would introduce new office, retail, and other commercial uses to the Project Site and be similar to adjacent and nearby land uses, including the adaptive reuse of former industrial and warehouse buildings to residential and commercial uses. Further, implementation of the Project would result in further infill of an already developed community, and development of the Project would occur within the boundaries of the Project Site as it currently exists. Accordingly, the Project would not physically divide an established community. No impact would occur and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

#### **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.** A significant impact may occur if a project would be inconsistent with the applicable land use plans, policies, or regulations of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental

<sup>46</sup> U.S. Department of Commerce, National Oceanic and Atmospheric Administration. What is a Tsunami? Available at: <http://oceanservice.noaa.gov/facts/tsunami.html>. Accessed on June 9, 2017.

<sup>47</sup> City of Los Angeles General Plan, Safety Element Exhibit G, Inundation & Tsunami Hazard Areas, March 1994. Available at: <http://cityplanning.lacity.org/cwd/gnlpIn/safteyelt.pdf>. Accessed on December 5, 2016.

effect. The Project Site is located within the Central City North Community Plan Area, which designates the Project Site for Heavy Industrial land uses. This land use designation corresponds with the zoning designation of M3 (Heavy Industrial). The Project Site is also located within the East Los Angeles State Enterprise Zone.<sup>48</sup> The Applicant is requesting a General Plan Amendment to amend the Central City North Community Plan Area's designation from the current Heavy Industrial land use designation to Regional Center Commercial; a Vesting Zone Change for the property from M3 to C2; a Height District Change from Height District 1 to Height District 2; a Master Conditional Use Permit for the sale and dispensing of alcohol; a Site Plan Review approval for a development that results in an increase of 50,000 gross sf of non-residential floor area; and a Vesting Tentative Tract Map (No. 74745) to merge and re-subdivide existing lots. Therefore, an evaluation of the effects of the Project's requested entitlements, as well as an evaluation of the Project's compliance with other applicable regional and local plans, policies, and regulations will be analyzed in the EIR.

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

**No Impact.** A significant impact may occur if a project would be inconsistent with an applicable habitat conservation plan or natural community conservation plan. As discussed in the responses to Checklist Question IV, Biological Resources, the Project Site is located in an urban area developed with office and commercial uses, associated garage and storage spaces, and surface parking lots. The Project Site does not support sensitive natural communities. Furthermore, the Project Site is not located in or adjacent to a Significant Ecological Area as defined by the County of Los Angeles.<sup>49</sup> The Project Site is similarly not located within a HCP or NCCP area.<sup>50</sup> Therefore, the Project would not conflict with the provisions of adopted applicable conservation plans. No impact would occur and no mitigation measures are required. No further evaluation of this topic in the 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?***

**Less Than Significant Impact.** A significant impact may occur if a project located in an area known to contain a mineral resource of value to the region and the residents of the state would adversely affect access to the resource or otherwise result in the loss of availability of the resource. According to the Conservation Element of the City of Los Angeles General Plan, sites that contain potentially significant sand and gravel deposits which are to be conserved follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses and lie along the floodplain between the San Fernando Valley and Downtown Los Angeles.<sup>51</sup> The Los

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<sup>48</sup> City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS), Parcel Profile Report: 926 E 4<sup>th</sup> St. Generated December 5, 2016.

<sup>49</sup> County of Los Angeles Department of Regional Planning, General Plan Figure 9.3, Significant Ecological Areas and Coastal Resource Areas Policy Map, Figure 9.3. February 2015. Available at: [http://planning.lacounty.gov/assets/upl/project/gp\\_2035\\_2014-FIG\\_9-3\\_significant\\_ecological\\_areas.pdf](http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf). Accessed on December 5, 2016.

<sup>50</sup> California Department of Fish and Wildlife, California Regional Conservation Plans, August 2015. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>. Accessed on December 5, 2016.

<sup>51</sup> City of Los Angeles General Plan, Conservation Element Section 18, Resource Management: Mineral Resources (Sand and Gravel), pg. II-57. Available at: [http://planning.lacity.org/Gp\\_Elements.html](http://planning.lacity.org/Gp_Elements.html). Accessed on December 6, 2016.

Angeles River is located approximately 0.35 miles east of the Project Site. In addition, the Project Site is located in a Mineral Resource Zone-2 area<sup>52</sup> and the General Plan Framework EIR also depicts the Project Site within a Mineral Resource Zone-2 area.<sup>53</sup> As noted in the Conservation Element, the Mineral Resource Zone-2 is a California Geological Survey (CSG) classification that denotes an area in which deposits, in this case sand and gravel, are of significance to the State. However, there are no known mineral resources at the Project Site, which has been previously developed with non-mining land uses. This general condition would continue with development of the Project. Therefore, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

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

**No Impact.** A significant impact may occur if a project located in an area known to contain a designated locally-important mineral resource recovery site would adversely affect access to the recovery site or otherwise result in the loss of availability of the recovery site. The Project Site is not designated as a current mineral resource extraction area by the State of California Department of Conservation<sup>54</sup> and there are no active aggregate mines on the Project Site or within the vicinity.<sup>55</sup> The Project Site is locally designated for Heavy Industrial uses within the City of Los Angeles General Plan and is not designated as a mineral extraction land use. The Project would not result in the loss of a locally important mineral resource recovery site so no impact would occur. No impact would occur and no mitigation measures are required. No further evaluation of this topic in the EIR is 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.** A significant impact may occur if a project would expose people to, or generate, noise levels in excess of established City of Los Angeles standards. Construction equipment that may generate temporary noise during Project development includes bulldozers, backhoes, cranes, loaders, or pile drivers. 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 parking garage, loading and unloading of trucks, and worker and visitor activities on the Project Site, especially outdoor activities in the passageway/plaza. While such activity would be consistent with other

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<sup>52</sup> City of Los Angeles General Plan, Conservation Element, Exhibit A, Mineral Resources, [http://planning.lacity.org/Gp\\_Elements.html](http://planning.lacity.org/Gp_Elements.html). Accessed on December 6, 2016.

<sup>53</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Section 2.17 Geologic/Seismic Conditions, Figure GS-1 – Areas Containing Significant Mineral Deposits in the City of Los Angeles. Available at: <http://planning.lacity.org/housinginitiatives/housingelement/frameworkeir/FrameworkFEIR.pdf>. Accessed December 6, 2016.

<sup>54</sup> 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](http://www.conservation.ca.gov/cgs/information/publications/ms/Documents/MS_52_2012.pdf). Accessed on December 6, 2016.

<sup>55</sup> California Department of Conservation, California Geological Survey, San Gabriel Valley P-C Region Showing MRZ-2 Areas and Active Mine Operations, 2010. Special Report 143: Part II. Available at: <http://maps.conservation.ca.gov/cgs/informationwarehouse/>. Accessed on December 6, 2016.



noise sources in the Project area, nearby land uses, mainly mixed live/work uses, could potentially be affected by Project noise. Therefore, the Project's potential to exceed noise 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.** A significant impact may occur if a project would expose people to, or generate, excessive groundborne vibration or groundborne noise levels. Construction of the Project may generate groundborne vibration, which may result in groundborne noise, due to Site grading, clearing activities, haul truck travel, and possibly pile driving. The Project would have the potential to generate, and therefore expose people to, groundborne vibration and groundborne noise levels during temporary construction activities. In addition, there is the potential for the Project to generate construction-related vibration that may affect adjacent structures. Therefore, groundborne vibration and groundborne noise for the construction period of the Project will be analyzed further in the EIR.

Once construction is complete, Project operations would be limited to commercial retail and office uses that 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 that 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 during operations.

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

**Potentially Significant Impact.** A significant impact may occur if a project would result in a substantial permanent increase in ambient noise levels in the project vicinity above existing conditions. 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 a new parking garage, and the presence of workers 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.** A significant impact may occur if a project would result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above existing conditions. As discussed in the response to Checklist Question XII.a, Project construction would require the use of heavy construction equipment that would generate temporary noise. 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?***

**No Impact.** A significant impact may occur if a project that is located within an airport land use plan area or within two miles of a public airport or public use airport would expose people residing or working in the project area to excessive noise levels. As discussed in the response to Checklist Question VIII.e, the Project Site is not located within an airport land use plan area

or within two miles of an airport. The nearest airport is Hawthorne Municipal Airport located approximately 9.8 miles southwest of the Project Site. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels from airport use. No impact would occur and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

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

**No Impact.** A significant impact may occur if a project that is located within the vicinity of a private airstrip would expose people residing or working in the project area to excessive noise levels. The Project is not located within the vicinity of a private airstrip.<sup>56,57</sup> Therefore, the Project would not expose people residing or working in the area to excessive noise levels from a private airstrip. No impact would occur and no mitigation measures are required. No further evaluation of this topic in the 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.** A significant impact may occur if a project would propose new development that induces substantial population growth in an area, either directly or indirectly. The proposed Project does not contain a residential component and would not directly increase population. As an urban infill development, the Project would rely upon existing urban infrastructure and would not extend roads or other infrastructure that would directly induce substantial population growth; infrastructure improvements would be limited to those required to serve the Project. However, as the Project would be comprised of 270,382 sf of new commercial (retail and food and beverage spaces) and office uses, it would generate an increased employee population compared to existing conditions. Therefore, the EIR will include an evaluation of employee and housing growth in the City, employees generated by the Project, and whether the Project's employees fall within the SCAG projections for employee growth in the City.

**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).** A significant impact may occur if a project would displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere. No residential dwelling units are currently located on the Project Site. Therefore, the Project would not result in the demolition of existing housing nor displace residents. The Project would replace existing office and commercial facilities with a mixed-use office, retail, and commercial

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<sup>56</sup> Los Angeles County Airport Land Use Commission. 2004. Los Angeles County Airport Land Use Plan. Revised December 1.

<sup>57</sup> Google Earth. 900 E. 4<sup>th</sup> Street, Los Angeles, California. Imagery Date: October 18, 2016. Accessed on June 13, 2017.

a population would not occur. No impact would occur and no mitigation measures are required. No further evaluation of this topic in the EIR is 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.** A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not serve the Project, as indicated by acceptable service ratios, response times or other performance objectives, and would require new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts. The LAFD provides fire protection and emergency medical services in the City of Los Angeles. Two fire stations are located in the vicinity of the Project Site, including Fire Station No. 9 at 430 E. 7<sup>th</sup> Street, located approximately 1.6 miles west of the Project Site, and Fire Station No. 4 at 450 E. Temple Street, located approximately 1.3 miles north of the Project Site.<sup>58</sup> As the Project would increase the developed floor area and height on the Project Site, as well as increase the number of employees and visitors to the Project Site, the Project may increase demand on LAFD fire protection and emergency medical services and associated facilities. Therefore, this issue will be further evaluated in the EIR.

**b) *Police protection?***

**Potentially Significant Impact.** A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not serve the Project, as indicated by acceptable service ratios, response times or other performance objectives, and would require new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts. The 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 the Central Bureau, which serves the Downtown business district. The Project Site is served by the Central Area Community Police Station located at 251 E. 6<sup>th</sup> Street, located approximately 1.4 miles west of the Project Site.<sup>59</sup> As the Project would increase the density of on-site development and introduce a greater number of visitors and employees to the Project Site, greater demand on LAPD police protection services and associated facilities may result from the development. Therefore, its potential impacts associated with police protection services will be analyzed further in the EIR.

**c) *Schools?***

**No Impact.** A significant impact may occur if the Los Angeles Unified School District (LAUSD) could not serve the Project, as indicated by acceptable performance objectives, and would require new or physically altered school facilities, the construction of which could cause

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<sup>58</sup> Google Maps, Search from 926 E 4<sup>th</sup> Street, <https://www.google.com/maps/> (accessed December 6, 2016).

<sup>59</sup> Google Maps, Search from 926 E 4<sup>th</sup> Street, <https://www.google.com/maps/> (accessed December 6, 2016).

significant environmental impacts. The Project Site is located within the jurisdiction of the LAUSD. As the Project would not introduce a new resident population to the Site, increased demand on LAUSD schools would not be generated. Therefore, no impact would occur and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

**d) Parks?**

**Less Than Significant Impact.** A significant impact may occur if the City of Los Angeles Department of Recreation and Parks (LADRP) could not serve the Project, as indicated by acceptable performance objectives, and would require new or physically altered park facilities, the construction of which could cause significant environmental impacts. As the Project would not introduce new residents to the Site, the Project would not increase demand on existing LADRP recreational and park facilities and services such that new or physically altered park and recreational facilities would be needed. The Project would include a ground floor landscaped plaza and passageway consisting of 10,823 sf of open space for employees and visitors, as well as a roof deck for building tenants, which would also reduce the Project's demand for recreational and park facilities. Therefore, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

**e) Other public facilities?**

**Less Than Significant Impact.** A significant impact may occur if a project would result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, need for new or physically altered governmental facilities, such as public library facilities or roadway infrastructure, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives of the Los Angeles Public Library (LAPL) or City of Los Angeles Department of Transportation (LADOT). The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles. As the Project would not introduce new residents to the Project Site, the Project would have a less than significant impact on LAPL library services. Therefore, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

Additional public facilities include roads and other infrastructure. During construction and operation of the Project, such facilities would be utilized. Project workers and visitors would use the existing road network, without the need for new roadways to serve the Project Site. As discussed in the response to Checklist Question XVI, Transportation/Traffic, the Project could potentially 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 roadway improvements beyond normal maintenance activities are not anticipated to be necessary. However, in the event that minor roadway improvements are warranted, such improvements would be constructed concurrent with the overall Project and would be subject to the requirements of the LADBS, LAFD, or LADOT, as applicable. Impacts associated with roadway improvements, if necessary, would be evaluated in the other sections of the EIR, such as Transportation/Traffic. Therefore, impacts would be less than significant and no mitigation measures are required. No further evaluation of Project effects to other governmental facilities in the EIR is 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?***

**Less Than Significant Impact.** A significant impact may occur if a project would increase the use of existing neighborhood and regional parks or other recreational facilities to such an extent that substantial physical deterioration of the facilities would occur or be accelerated. As the Project would not introduce a new residential population to the area, the Project would not increase demand on existing public recreational and park facilities such that substantial physical deterioration of the facilities would occur or be accelerated. Furthermore, the Project would also include open space areas, including a ground floor landscaped plaza and passageway consisting of 10,823 sf of open space for employees and visitors, as well as a roof deck for building tenants, which would reduce the Project's demand for recreational and park facilities. Therefore, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

- 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?***

**Less Than Significant Impact.** A significant impact may occur if a project would include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. The Project would provide a ground floor plaza for visitors, customers, and employees but does not propose new recreational facilities. The Project does not include a residential component that would increase demand on off-site recreational facilities. The Project would not require the construction or expansion of off-site recreational facilities that might have an adverse physical effect on the environment. Therefore, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

## 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.** A significant impact may occur if a project's generated traffic would be inconsistent with Los Angeles Department of Transportation (LADOT) standards. The Project Site is subject to the LADOT standards and guidelines regarding trip generation and levels of service (LOS) for the street system. The Project includes the existing 7,800 sf A+D Museum and would also develop 14,995 sf of retail and food and beverage space; 255,387 sf of offices and lobbies; 11,021 sf of common areas, and 538 parking stalls. These uses would add traffic to local and regional transportation systems. Therefore, operation of the Project may adversely affect the existing capacity of the street system or exceed an established LOS standard. Project construction may also result in a temporary increase in traffic due to construction-related truck trips and worker vehicle trips. Therefore, traffic impacts during

construction may also adversely affect the street system. As the Project has the potential to result in a significant traffic impact, this topic 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.** A significant impact may occur if a project would conflict with Metro's CMP. As previously discussed, 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 Metro's CMP, including evaluation of freeway segments where a project could add 150 or more trips in each direction during the peak hours, and CMP intersections where a project would add 50 or more trips during either peak hour.<sup>60</sup> As trip estimates for the Project are as yet to be calculated, the Project may potentially generate vehicle trips that affect a freeway segment or CMP intersection. Therefore, this issue 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?***

**No Impact.** A significant impact may occur if a project would result in a change in air traffic patterns and associated safety risks. As discussed in the response to Checklist Question VIII.e, the nearest airport or heliport is the Hawthorne Municipal Airport, which is located approximately 9.8 miles southwest of the Project Site. The Project Site is not located within flight paths; does not propose construction that requires notification of the Federal Aviation Administration (i.e., does not exceed 200 feet in height); and would not result in a change in air traffic patterns, including increases in traffic levels or changes in location that would result in substantial safety risks. Therefore, no impacts would occur and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

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

**Potentially Significant Impact.** A significant impact may occur if a project would substantially increase traffic-related hazards due to a design feature or incompatible uses. The Project would not substantially alter existing street patterns in the vicinity and there are no existing hazardous design features, such as sharp curves or dangerous intersections on-site or within the Project vicinity. However, Project construction may require temporary lane or sidewalk closures, and operation of the Project would alter the way vehicles ingress and egress the Project Site. The Project would result in increased trip generation and driveway use compared to existing on-site uses. Additionally, the Project may result in an increase in traffic levels in the Project area. During construction, access on and near the Project Site may be temporarily disrupted, resulting in conflicts with vehicles, pedestrians and/or bicyclists. Considering these factors, the potential for hazardous conditions may increase over existing conditions. Therefore, further analysis of this issue will be included in the EIR.

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<sup>60</sup> Los Angeles County Metropolitan Transportation Authority. 2010 Congestion Management Program for Los Angeles County.

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

**Potentially Significant Impact.** A significant impact may occur if a project would impede the ability of emergency vehicles to access and serve the Project Site and surrounding land uses. Immediate vehicular access to the Project Site is provided via E. 4<sup>th</sup> Street and S. Hewitt Street. While the majority of construction activities for the Project would be on-site, temporary construction activities may temporarily affect access on 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 surrounding the Project Site through the provision of parking garage access on 4<sup>th</sup> Street, delivery truck loading dock access on Hewitt Street, and emergency vehicle ingress and egress. Therefore, this issue 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.** A significant impact may occur if a project would be inconsistent with adopted policies, plans, or programs regarding public transit and alternative modes of transportation, or otherwise decrease the performance or safety of such facilities. The Project Site is located in a TPA served by public transportation.<sup>61</sup> Several transit providers operate transit service within the immediate vicinity, including the Metro Gold Line Little Tokyo Station located one half-mile north of the Project Site.<sup>62</sup> The bus stops closest to the Project Site are located at 4<sup>th</sup> Place and Hewitt Street and Merrick Street and Traction Avenue and are served by the Los Angeles Department of Transportation's (LADOT's) Downtown Area Short Hop (DASH) A line, a local community shuttle bus. This line provides connections to Downtown Los Angeles.<sup>63</sup> Additional bus stops in the Project area are located at 4<sup>th</sup> Street and Alameda Street and 4<sup>th</sup> Street and Merrick Street and are served by the Montebello Bus Line M40. Montebello Bus Line M40 and Montebello Bus Line M90 also operate along 4<sup>th</sup> Street. Additional transit service in the Project area is provided by Metro Local Lines 18, 53, and 62, and Metro Rapid Line 720.<sup>64</sup> Further, the City of Los Angeles Mobility Plan 2035, an Element of the General Plan, includes maps that show a Bicycle Enhanced Network and a Bicycle Lane Network, which are comprised of arterial streets and other rights-of-way prioritized for bicycle movement. In the vicinity of the Project Site, the Mobility Plan designates a Tier 1 Protected Bicycle Lane along 6<sup>th</sup> Street south of the Project Site, along 1<sup>st</sup> Street north of the Property, along 3<sup>rd</sup> Street to the northeast, and along Central Avenue to the west.<sup>65</sup> Tier 2 Bicycle Lanes are also designated along 7<sup>th</sup> Street south of the Property and along Mateo and 3<sup>rd</sup> Streets in the surrounding neighborhood. Alameda Street is designated as a Bike Path north of 6<sup>th</sup> Street. In addition, the City of Los Angeles 2010 Bicycle Plan, designates 2<sup>nd</sup>, 6<sup>th</sup>, and 7<sup>th</sup> Streets and Central Avenue in the Project vicinity as part of the Backbone Bikeway Network.<sup>66</sup>

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<sup>61</sup> City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS), Parcel Profile Report: 926 E 4<sup>th</sup> St. Generated December 5, 2016.

<sup>62</sup> Los Angeles County Metropolitan Transportation Authority. Metro Gold Line. Available at: <https://media.metro.net/documents/9a582fb5-68f7-44e4-903b-b170294abd7e.pdf>. Accessed on June 8, 2017.

<sup>63</sup> Los Angeles County Metropolitan Transportation Authority. Metro Trip Planner. Available at: [https://trips.metro.net/tm\\_pub\\_start.php?place0=926+4th+street%2C+los+angeles&place1=&timecrit0=AR&day0=WED&hour0=+08&min0=+12&ampm0=A&fare=RG&evaluateButton=+Plan+My+Trip](https://trips.metro.net/tm_pub_start.php?place0=926+4th+street%2C+los+angeles&place1=&timecrit0=AR&day0=WED&hour0=+08&min0=+12&ampm0=A&fare=RG&evaluateButton=+Plan+My+Trip). Accessed on June 8, 2017.

<sup>64</sup> Ibid.

<sup>65</sup> Los Angeles Department of City Planning. Mobility Plan 2035, An Element of the General Plan. Adopted September 7, 2016.

<sup>66</sup> Los Angeles Department of City Planning, 2010 Bicycle Plan, Exhibit D: 2010 Bicycle Plan Designated Bikeways. Adopted March 1, 2011.

As the Project would intensify development within a TPA, and it has been designed to encourage walkability in the area, it is anticipated that the Project would be consistent with transit and pedestrian oriented development goals for TPAs and would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, nor otherwise decrease the performance or safety of such facilities. Nevertheless, this issue will be analyzed further in the EIR to more closely evaluate the Project for consistency and potential conflicts.

## **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).***

**Potentially Significant Impact.** A significant impact would occur if a project would cause a substantial adverse change in the significance of a tribal cultural resource 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). The existing structures on the Project Site are not listed in the California Register of Historical Resources<sup>67</sup>, nor are they listed as historic by the City of Los Angeles Office of Historic Resources.<sup>68 69</sup> As discussed in responses to the preceding checklist questions in Section V.a., Cultural Resources, the existing A+D Museum to remain on-site and two structures on the Project Site that are proposed to be demolished are over 45 years in age and may qualify as historical resources. Therefore, potential impacts to historical resources will be further analyzed in the EIR.

- b) ***A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

**Potentially Significant Impact.** A significant impact would occur if a project would cause a substantial adverse change in the significance of a tribal cultural resource that is a resource determined by the lead agency to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. Pursuant Assembly Bill 52 (AB 52), CEQA includes a consultation process for California Native American Tribes to identify potentially significant impacts to tribal cultural resources. As part of this process, lead agencies are required to

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<sup>67</sup> California State Parks, Office of Historic Preservation. California Historic Resources – Los Angeles County. Available at: <http://www.ohp.parks.ca.gov/ListedResources/?view=county&criteria=19>. Accessed on January 6, 2017.

<sup>68</sup> City of Los Angeles Office of Historic Resources. Los Angeles Historic Resources Survey (SurveyLA). Available at: <http://preservation.lacity.org/survey>. Accessed on January 6, 2017.

<sup>69</sup> City of Los Angeles Office of Historic Resources. Los Angeles Historic Resources Inventory. Available at: [http://www.historicplacesla.org/about\\_data](http://www.historicplacesla.org/about_data). Accessed on January 6, 2017.



provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if a tribal representative has submitted a written request to be notified of such projects. The tribe must respond to the lead agency within 30 days of receipt of the notification in order to engage in consultation on the project, and the lead agency must then begin the consultation process within 30 days of receiving the request for consultation. Information gained during the consultation process is used to analyze impacts to tribal cultural resources in the EIR or other CEQA documents, as applicable. In addition, as the proposed Project would require a General Plan Amendment (GPA), it is subject to the requirements of SB 18, Traditional Tribal Cultural Places (Government Code Section 65352.3). SB 18 requires local governments to send written notice to local tribes identified by the NAHC, invite comments on the subject GPA for the purpose of avoiding or mitigating impacts to cultural places, and engage in consultation to address issues that may arise from the Project. The City of Los Angeles, as lead agency, will send Tribal Cultural Resource Consultation letters for this Project. As discussed in the responses to the preceding checklist questions in Section V, Cultural Resources, the Project may potentially uncover previously undiscovered archaeological resources, which may include tribal cultural resources. Therefore, 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.** A significant impact may occur if a project would exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board (LARWQCB). The City Department of Public Works (LADPW) provides wastewater services for the Project Site. Wastewater that would be generated at the Project Site would be treated at the Hyperion Treatment Plant (HTP), which is part of the Hyperion Treatment System. The discharge of effluent from the HTP into Santa Monica Bay is regulated by the HTP's National Pollutant Discharge Elimination System (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 increased sources of wastewater generated at the Project Site with the development of the new commercial uses along with related amenities. 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.

- 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.** A significant impact may occur if a project would increase water use or generate wastewater to such an extent that the construction of new or expanded water or wastewater treatment facilities that could cause significant environmental effects are required. Water and wastewater systems include the source of the water supply or place of sewage treatment, as well as the conveyance systems (i.e., distribution lines and mains) that link these facilities to a 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.** A significant impact may occur if a project would result in an increase in storm water runoff in levels that require the construction of new or expanded storm water drainage facilities, the construction of which could cause significant environmental effects. Under existing conditions, the Project Site is developed with office and commercial uses, as well as associated garage and storage space and surface parking lots. Current drainage flows on the Project Site discharge to existing stormwater inlets in adjacent streets. Project implementation may require grading and alterations to the drainage patterns within 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.** A significant impact may occur if a project would not have sufficient water supplies available to serve the project from existing entitlements and resources, or would require new or expanded service or entitlements. Project land uses 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. Therefore, a WSA will be prepared for the Project. This topic will be further analyzed in the EIR 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.** A significant impact may occur if a project would increase wastewater generation to such an extent that it exceeds the capacity of the current wastewater treatment provider. 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 analyzed further 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.** A significant impact may occur if a project would increase solid waste generation to such an extent that it exceeds the permitted capacity of landfills located in the region. 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 City does not own or operate landfill facilities; the majority of its solid waste is disposed of in landfill facilities overseen by the County of Los Angeles. In addition to in-County landfills, out-of-County disposal facilities are also available to the City. Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County's landfills. Nevertheless, the Project's construction

and operational solid waste generation, landfill capacity, and disposal services will be further analyzed in the EIR.

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

**Less Than Significant Impact.** A significant impact may occur if a project would be inconsistent with federal, state, and local solid waste statutes and regulations. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes source reduction, recycling, and reuse of solid waste on a State level. The City of Los Angeles is implementing similar local statutes and regulations, such as its “Zero-Waste-to-Landfill” goal to achieve zero waste to landfills by 2025 to enhance the Solid Waste Integrated Resources Planning Process. The Project would be consistent with applicable solid waste regulations. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance, which requires that developments include a recycling area or room of specified size on the Project Site. Further, the Project would comply with the City’s Construction and Demolition Waste Recycling Ordinance. The Project would also promote compliance with AB 939 and City waste diversion goals by providing clearly marked receptacles for recycling. As the Project would comply with Federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in the EIR is required. Nevertheless, the regulatory framework for solid waste will be included in the EIR as part of Item XVIII.f, above.

## **XIX. MANDATORY FINDINGS OF SIGNIFICANCE**

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

**Potentially Significant Impact.** A significant impact may occur if a project would 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. 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.

However, as discussed within this Initial Study, the Project could result in environmental impacts that have the potential to degrade the quality of environment as addressed herein. Potentially affected resources include Air Quality, Cultural and Tribal Cultural Resources (Historical, Archaeological, and Paleontological 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 and Police), Transportation/Traffic (Traffic and Access), and Utilities (Water, Wastewater, Stormwater, and Solid Waste). An environmental analysis will be prepared to analyze and document these potentially significant impacts in the EIR. In addition, pursuant to Appendix F, Energy

Conservation, of the CEQA Guidelines, the EIR will include an energy analysis that evaluates the Project's potential to result in the inefficient, wasteful, and unnecessary consumption of energy, which would be considered a significant impact.

- 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.** A significant impact may occur if a project would have impacts that are individually limited but cumulatively considerable. 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. Consideration of cumulative impacts would be provided for each topic within this Initial Study that was determined to have the potential for significant impacts and were therefore recommended for further evaluation in the EIR, including 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 and Police), Transportation/Traffic, and Utilities and Service Systems (Water, Wastewater, Stormwater, and Solid Waste). In addition, pursuant to Appendix F, Energy Conservation, of the CEQA Guidelines, the EIR will include an evaluation of the Project's potential cumulative impacts related to inefficient, wasteful, and unnecessary energy consumption.

With regard to the resources evaluated in this Initial Study to which the Project was determined to result in a less than significant or no impact, the Project would similarly result in less than significant or no cumulative impact related to these resources, as its incremental contribution would not be cumulatively considerable. Specifically, the Project would result in no direct impact to Agriculture and Forestry Resources, as it would not be located on land that includes these resources or land uses. It would also result in no direct impact to Public Services – Schools or Other Public Services – Libraries, as it would not introduce a new resident population to the Site and would not increase the demand for LAUSD or Los Angeles Public Library (LAPL) services. Therefore, the Project would not contribute to cumulative impacts to Agriculture and Forestry Resources or to Public Services – Schools. Further, due to the fact that it would not generate a residential population and also proposes open space areas (i.e., ground floor plaza, balconies, and a roof deck) for its users, the Project would not increase demand for parks and recreational facilities and therefore would result in less than significant direct and cumulative impacts to Public Services – Parks and Recreation. In addition, as the Project would be located on a previously developed site within an urbanized area, it would result in less than significant impacts to Biological and Mineral Resources and could not combine with related projects to result in significant cumulative impacts to these resources. Based on this information, the Project would result in less significant cumulative impacts with regard to Agriculture, Forestry Biological, and Mineral Resources; Public Services – Schools and Parks; and Recreation.

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

**Potentially Significant Impact.** A significant impact may occur if a project would have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. As discussed in this Initial Study, the Project could result in potentially

significant environmental impacts, which could have potentially adverse effects on human beings. Further analysis of these impacts is recommended in the EIR, as noted earlier in this Initial Study.

## **Appendix IS-1**

### **Biological Resources**

MARK RIOS  
JULIE SMITH-CLEMENTI  
FRANK CLEMENTI  
ROBERT HALE  
MARK MOTOBAGA  
JONATHAN BLACK  
JENNIFER SCHAR  
SAMANTHA HARRIS  
MIKE CHENG  
NATT RICHMOND  
CHIARI KANDA  
SEBASTIAN SALVADÓ  
CLAUDIA MORELLO  
CAROLYN SUNIDA  
MICHAEL SWEENEY  
JESSA CHISARI  
HASEEMA ASIF  
JAKUB TEJCHMAN  
HUAY KEE  
LAURA KOS  
AIMEE LESS  
RYAN VASQUEZ  
GREG KOCHANOWSKI  
ALESSA HISOIRE  
AMANDA SIGAFOS  
CLANCY PEARSON  
MIKE TRANUTOLA  
BROOKS MIKKELSEN  
TOH MYERS  
JULIEN HARCC  
ELISA READ  
SABRINA SCHMIDT-WETEKAM  
RUSSELL DYKANN  
BRENT JACOBSEN  
BEN STOUGH  
ANDY LANTZ  
ADAM PIERCE  
HAORAN LIN  
KRISTAL SCOTT  
BOB FREDERICK  
JASON NEUFELD  
ORLANDO PIRA  
JUSTIN CHA  
ABIGAIL FELDMAN  
JOSEPH SCHERER  
SUZAN ELWYN  
JOHN ROSENTHAL  
BEN TAMUNO-KOKO  
HANNAH BLOCK  
ANNE CLARK  
KWONSOO KIM  
CAMERON STEWART  
BEN TOAM  
JAMES LIVELY  
TEDD BUFFA  
BRITTANY MILLER  
THERESA ZURIGA-FORTUN  
RACHEL TUCKER  
MIYA CHUA  
NOEL VIDAL  
MARCO HORTER  
ALBERTO GALINDO  
KATE GMYREK  
SHERRY JONHERSHA  
DUSTIN GRAMSTAD  
HELEN HEA BIN KANG  
ANY BRZECZEK  
JASON SHIHODA  
SABINA CHENG  
AMELIA WONG  
CAMILLA GAISIE  
JESSAMYN DAVIS  
RATIE DRISCOLL  
JEFFREY DUNN  
TODD SWANSON  
DANIEL POLE  
ASHLEY HART  
RYAN CARRINGTON  
GRANT SAITA  
DEVIN MIYASAKI  
EVELYN TRING  
LAYTON PETERSON  
CLARISSA CHUNG  
COLIN THOMPSON  
MIKE GREGG  
CHRISTOPHER FENTON  
JORDAN MENDENHALL  
NICOLE RYAN  
MARISOL MEJIA  
DELTA MURPHY  
HALLORY COHR  
NICOLE ROBINSON  
SANTA JOSIAH  
CORY SEEGER  
JUAN LAU  
JONATHAN FROINES  
HUNCH SURG  
ERIN WILLIAMS  
SARDY YUM  
ALEX HARK  
HESOT SALLAH  
TINA RAMADANI  
DAMI OLUOKUNSHI  
HEEJAE LEE  
FOAD YAHIDI  
ERIC LALORE  
JIN TACK LIM  
NICK PARADOWSKI  
BRENT LUCY  
JUSTIN HENMAN  
DANNY TRAVIS  
HERO KAMILZONO  
MARY BETH CACCITTOLO

January 9, 2017

Dilip K. Bhavnani  
Chief Operating Officer  
Legendary Investors Group  
401 S. Hewitt St.  
Los Angeles, CA 90039

Sent via email: [dillip@sunscopeusa.com](mailto:dillip@sunscopeusa.com)

Re: 401 S. Hewitt

Dear Mr. Bhavnani,

This letter is in regards to the property at 401 S. Hewitt. On October 11 2016, I reviewed the site as the Landscape Architect to evaluate any tree species and to determine if the property contains any native protected trees or trees that are greater than 8" in diameter per subdivision requirements.

#### SITE HISTORY

The property is currently developed as the A+D Museum, commercial space, storage and on-grade parking. Legendary plans to develop a multi-use building comprised of creative office, commercial retail spaces and a landscaped open space on this lot located in the Arts District in Downtown Los Angeles.

On this property, I have observed that there are NO trees within the entire undeveloped lot that would be considered protected within the City of Los Angeles Native Protected Tree Ordinance.

Should you have any questions, please feel free to contact me at (323) 785-1827.

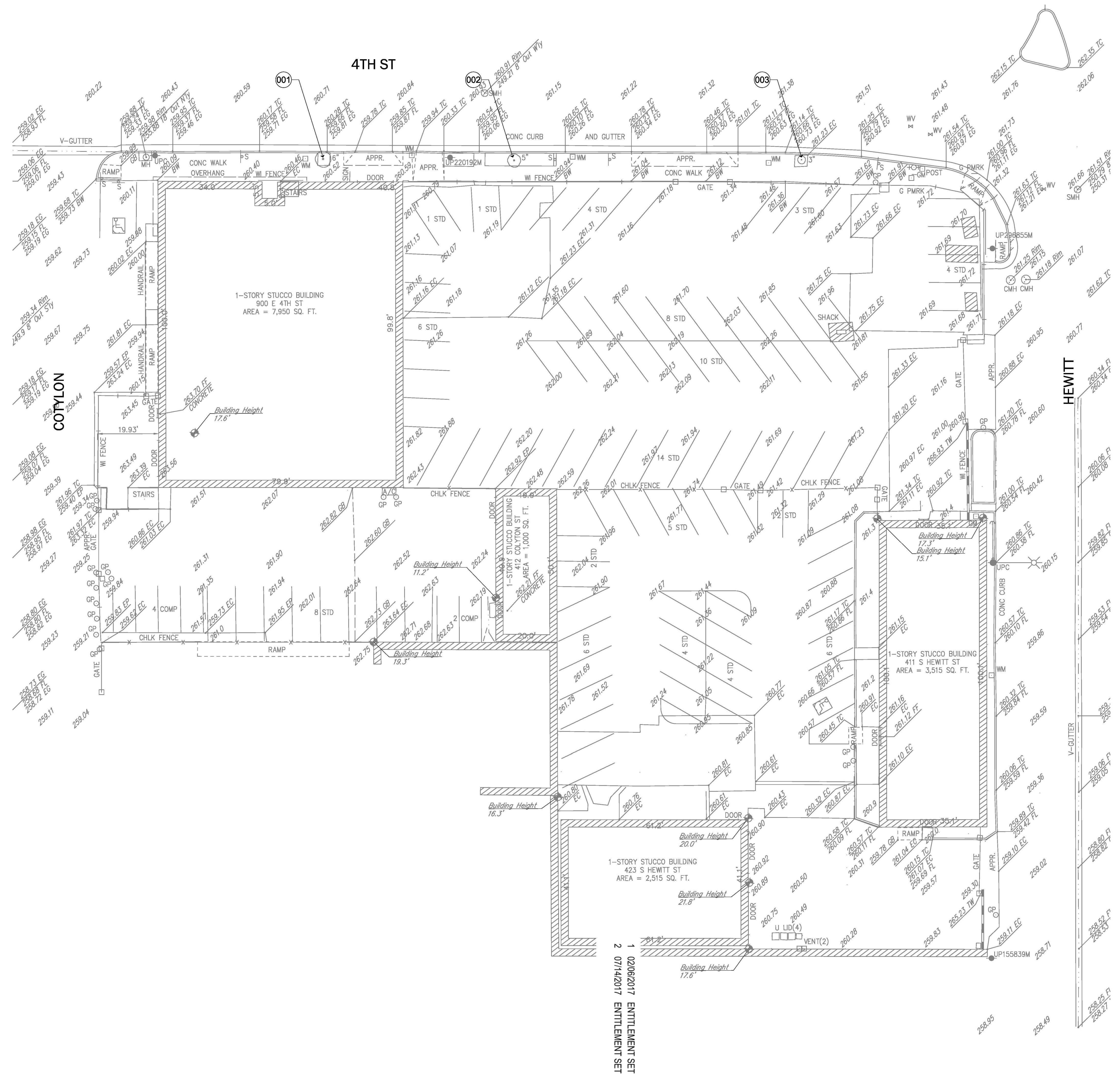
Sincerely,  
RIOS CLEMENTI HALE STUDIOS



Samantha Harris, Principal, Rios Clementi Hale Studios  
Licensed Landscape Architect #5103  
Member of American Society of Landscape Architects

LEGEND			
KEY	SCIENTIFIC NAME	COMMON NAME	SIZE
001	Tristania conferta	Brisbane Box	6"
002	Tristania conferta	Brisbane Box	5"
003	Tristania conferta	Brisbane Box	3"

PER LAMC SECTION 12.21  
SUBSECTION A, SUBDIVISION 12,  
THERE ARE NO PROTECTED TREE  
SPECIES CURRENTLY ON SITE.



1 02/06/2017 ENTITLEMENT SET  
2 07/14/2017 ENTITLEMENT SET

**Legendary Investors Group**  
401 S. Hewitt, Los Angeles, CA 90013

**Gensler**  
500 South Figueroa Street  
Los Angeles, California 90071  
United States  
Tel 213.327.3600  
Fax 213.327.3601

WALTER P MOORE  
707 Wilshire Blvd., Suite 2100  
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Tel 213.292.6500  
Fax 213.292.6600

ARC  
277 S. Laka Street  
Burbank, CA 91502  
Tel 818.508.6300  
Fax 818.508.7050

RIOS CLEMENTI HALE STUDIOS

WALKER  
606 S. Olive St. Suite 1100  
Los Angeles, CA 90014  
Tel 213.488.4911

PSCHAS  
555 Flower St., Suite 4300  
Los Angeles, CA 90071  
Tel 213.223.1400

Date	Description

Seal / Signature

**NOT FOR CONSTRUCTION**

Project Name  
**4th & Hewitt Complex**

Project Number  
**05.1291.000**

Description  
**EXISTING TREE PLAN**

Scale  
**1/16" = 1'-0"**

**L0.01**