LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

INITIAL STUDY

8th & Alameda Studios Project

Case Number: ENV-2021-4260-MND

Project Location: 1820–2120 East 8th Street, 820–840 South Alameda Street, 2150 East Damon Street, 1301 South Lemon Street, 1121–1143 Lawrence Street, and 2015–2101 East Olympic Boulevard, Los Angeles, California 90021

Community Plan Area: Central City North Community Plan

Council District: 14—de León

Project Description: The Project proposes the renovation of the existing 558,918-square-foot Los Angeles Times Olympic Printing Plant (referred to as Plant or Building 1 under the Project) and a 23,005-square-foot vehicular maintenance building (referred to as maintenance building or Building 2 under the Project) and the construction of approximately 249,790 square feet of floor area comprised of new studio uses, support/office uses, a shops/office building, and three guard booths. Three ancillary structures would be removed as part of the Project. Upon completion, the Project would provide 832,190 square feet of floor area with a floor area ratio (FAR) of up to 0.74:1. The uses within the Project Site would be supported by 1,522 vehicle parking spaces within a nine-level, above-ground parking structure (Building 8) and 143 surface vehicle parking spaces. The Project would also provide 58 bicycle parking spaces (25 short-term and 33 long-term). Regarding the anticipated haul route for the Project, loaded haul trucks would exit the Project gate at Hunter Street/Lawrence Street, make a left turn onto Lawrence Street, left onto Olympic Boulevard, and right onto I-10 Freeway. An alternate route for haul trucks leaving the Project Site would consist of the following: trucks exit from the Project's main gate, left onto 8th Street, left onto Alameda Street, left onto Olympic Boulevard and right onto the I-10 Freeway. Empty haul trucks coming to the Project Site would travel westbound on I-10 Freeway, exit 14th Street, right onto Alameda Street heading north, right onto 8th Street and right onto Project Site. Construction would require approximately 4,250 cubic yards of total soil export and no soil import.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
Eyestone Environmental, LLC

APPLICANT:
Alameda & 8th Owner, LLC

February 2022

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1 INTRODUCTION

An application for the proposed 8th & Alameda Studios Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles, as Lead Agency, has determined the Project is subject to the California Environmental Quality Act (CEQA) and that the preparation of an Initial Study is required.

This Initial Study (IS) evaluates the potential environmental effects that could result from the construction, implementation, and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations Section 15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. This Initial Study is intended as an informational document, which isare ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration or Mitigated Negative Declaration is appropriate, an EIR is normally required.

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1. INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2. EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3. PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4. EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project. This Section also includes mitigation measures that will be implemented to reduce impacts to less than significant levels. In accordance with Public Resources Code Section 21064.5 and CEQA Guidelines Sections 15064(f)(2) and 15070(b), the mitigation measures contained in Section 4, below have been agreed to by the Applicant.

1.3 CEQA PROCESS

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. As described below, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the Project may have a significant effect on the environment. This Initial Study determined that with implementation of mitigation, agreed to by the Applicant, the Project would not have a significant effect(s) on the environment and a MND will be appropriate for the Project. As set forth in Section 15072 of the CEQA Guidelines, the City, as the Lead Agency for the Project, will provide a notice of intent to adopt an MND to the public, responsible agencies, trustee agencies, and the county clerk to allow the public and agencies to review the proposed MND. Pursuant to Section 15105 of the CEQA Guidelines, the public review period for a proposed Negative Declaration or MND shall be not less than 20 days (or 30 days when a proposed Negative Declaration or MND is submitted to the State Clearinghouse for review by state agencies.

2 EXECUTIVE SUMMARY

PROJECT TITLE	**8th & Alameda Studios Project**
ENVIRONMENTAL CASE NO.	ENV-2021-4260-MND
RELATED CASES	CPC-2021-4259-CU-CUB-SPR, VTT-83418

PROJECT LOCATION	1820–2120 East 8th Street, 820–840 South Alameda Street, 2150 East Damon Street, 1301 South Lemon Street, 1121–1143 Lawrence Street, and 2015–2101 East Olympic Boulevard, Los Angeles, California 90021
COMMUNITY PLAN AREA	Central City North Community Plan
GENERAL PLAN DESIGNATION	Industrial
ZONING	M3-1-RIO
COUNCIL DISTRICT	14—de León

LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	Obiamaka Ude
ADDRESS	200 North Spring Street, Room 763 Los Angeles, CA 90012
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APPLICANT	**Alameda & 8th Owner, LLC**
ADDRESS	1318 East 7th Street, Los Angeles, CA 90021
PHONE NUMBER	(213) 212-4263

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by the Project. The impacts for each of these environmental factors would be less than significant with implementation of the mitigation measures included in this MND.

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

DETERMINATION

(To be completed by the 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.

Obiamaka Ude, Planning Assistant	February 2, 2022
PRINTED NAME, TITLE	**DATE**

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 that 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.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

Alameda & 8th Owner LLC (applicant) proposes the 8th and Alameda Studios Project (Project) on an approximately 25.84-acre site located at 1820–2120 East 8th Street, 820–840 South Alameda Street, 2150 East Damon Street, 1301 South Lemon Street, 1121–1143 Lawrence Street, and 2015–2101 East Olympic Boulevard (Project Site) in the Central City North Community Plan Area of the City of Los Angeles (City).1 The Project proposes the renovation of the existing 558,918-square-foot Los Angeles Times Olympic Printing Plant (referred to as Plant or Building 1 under the Project) and a 23,005-square-foot vehicular maintenance building (referred to as maintenance building or Building 2 under the project) and the construction of approximately 249,790 square feet of floor area comprised of new studio uses, support/office uses, a shops/office building, and three guard booths.2 Three ancillary structures would be removed as part of the project. Upon completion, the project would include 832,190 square feet of floor area with a floor area ratio (FAR) of up to 0.74:1. The proposed uses within the project site would be supported by 1,522 vehicle parking spaces within a nine-level, above-ground parking structure (referred to as Building 8) and 143 surface vehicle parking spaces. Regarding the anticipated haul route for the Project, loaded haul trucks would exit the Project gate at Hunter Street/Lawrence Street, make a left turn onto Lawrence Street, left onto Olympic Boulevard, and right onto I-10 Freeway. An alternate route for haul trucks leaving the Project Site would consist of the following: trucks exit from the Project's main gate, left onto 8th Street, left onto Alameda Street, left onto Olympic Boulevard and right onto the I-10 Freeway. Empty haul trucks coming to the Project Site would travel westbound on I-10 Freeway, exit 14th Street, right onto Alameda Street heading north, right onto 8th Street and right onto Project Site. Construction would require approximately 4,250 cubic yards of total soil export and no soil import.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 1820–2120 East 8th Street, 820–840 South Alameda Street, 2150 East Damon Street, 1301 South Lemon Street, 1121–1143 Lawrence Street, and 2015–2101 East Olympic Boulevard in the Central City North Community Plan Area of the City of Los Angeles. The Project Site is located approximately 0.4 mile west of the Los Angeles River and approximately 13 miles east the Pacific Ocean. As shown in Figure 1 and Figure 2 on pages 7 and 8, the irregularly shaped Project Site is generally bounded by 8th Street to the north, Lemon Street to the east, East Olympic Boulevard and Hunter Street to the south, and Lawrence Street and South Alameda Street to the west.

Regional access to the Project Site is provided by the Santa Monica Freeway (I-10) approximately 360 feet to the south, the Hollywood Freeway (US-101) approximately one mile to the east, and the

1 The Project Site consists of 25.84 acres when accounting for dedications and 25.9 acres prior to dedications.

2 Note that with the renovation of the existing buildings, mechanical areas that are not currently included as floor area as defined by the LAMC would be converted to studio-related uses, which would be counted as floor area. As such, with the reconfiguration of the existing buildings, the floor area of the existing buildings would increase by approximately 477 square feet for a total of 582,400 square feet of floor area.

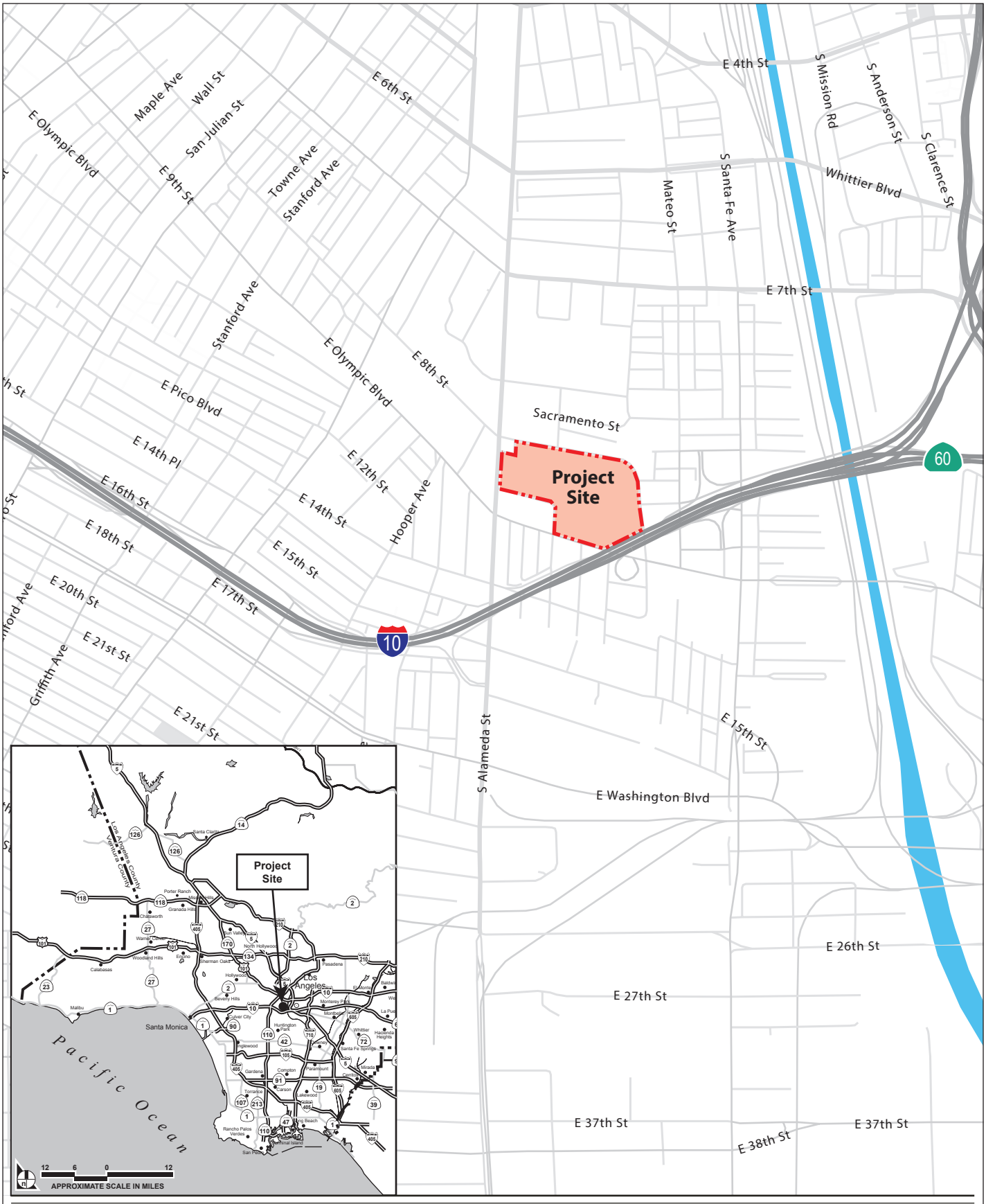

Figure 1
Project Location Map

Source: ArcGIS, 2021; Eyestone Environmental, 2021.

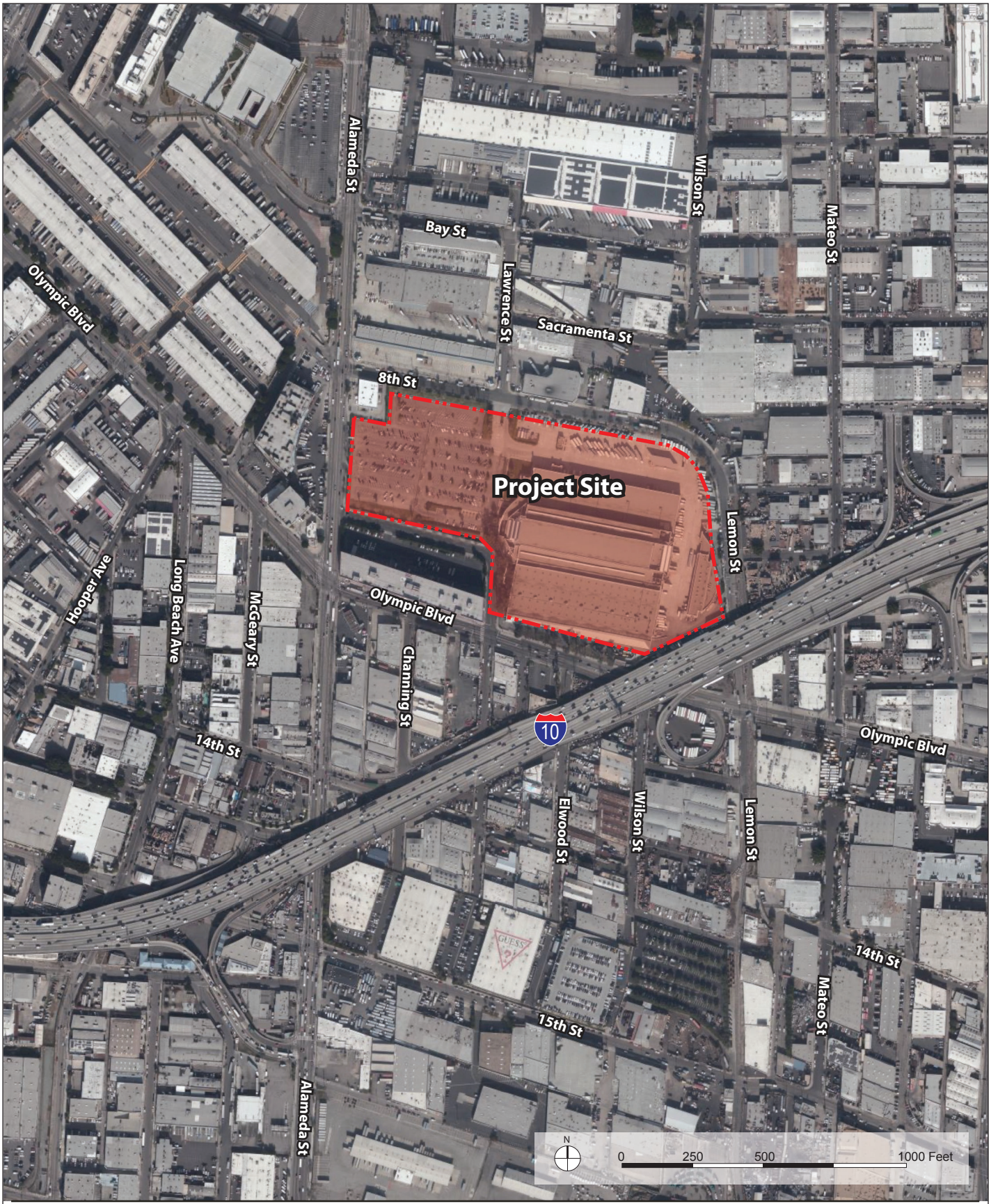

Figure 2

Aerial Photograph of the Project Vicinity

Source: Apple Maps, 2021; Eyestone Environmental, 2021.

Golden State Freeway (I-5) approximately one mile to the east. Local access to the Project Site is provided by several local streets and avenues, including East 9th Street, East Olympic Boulevard, 7th Street, Mateo Street, South Santa Fe Avenue, and Alameda Street, which also provides access to Union Station. The Project Site is also well served by a variety of public transit options, including local and regional bus lines, subway stations, and regional rail service providing ample connections to local and regional destinations. In particular, the Project Site is located in the vicinity of Los Angeles County Metropolitan Transit Authority (Metro) Local Bus Lines 18, 53, 60, 62, and 66 and Metro Rapid Line 720. The Project Site is also located approximately 0.8 miles from the Metro A Line Washington Station and 1.4 miles from the Metro L Line Little Tokyo/Arts District Station, which provides connections to regional destinations.

3.2.2 Existing Conditions

As shown in Figure 3 on page 10, the 25.84 acre Project Site currently contains the 558,918-square-foot Plant, the 23,005-square-foot maintenance building, six ancillary structures, and existing surface parking.[3] The Plant is located within the larger eastern portion of the Project Site, and the existing surface parking with approximately 724 parking spaces is located in the smaller western portion of the Project Site. The existing ancillary structures on-site include a guard house, an angled canopy, a drum storage building, a pump house/waste storage building, a pump room, and a curving walled enclosure with an emergency generator and other equipment. Specifically, to the north of the Plant are the small guard house (at an existing entrance driveway), a pump house/waste storage building, and the angled canopy that once covered a fueling station that has since been demolished. To the east of the Plant are the one-story drum storage building and the 23,005-square-foot, one-story maintenance building with multiple garages and bays opening to the west. To the south is the pump room and the curving walled enclosure with an emergency generator and other equipment.

Existing vehicular and pedestrian access to the Project Site is currently available via two-way gated driveways on 8th Street, Lemon Street, and South Alameda Street. Additionally, three existing vehicular exit-only gates are located on Lawrence Avenue, East Olympic Boulevard, and Lemon Street.

Landscaping within the Project Site includes ornamental landscaping and hardscape features. A total of 173 trees and palms were inventoried, including 122 on-site trees and 51 street trees. Street trees and trees within the Project Site consist of various non-native species, including Indian laurel figs, Canary Island date palms, Mexican fan palms, river red gums, edible figs, London planes, a weeping fig and a carrotwood. In order to describe tree size, the City's Planning Division considers any tree "significant" if it has a trunk diameter of eight inches or greater. As such, 98 of the 122 on-site trees are considered to be "significant" as defined by the City's Planning Division based on their trunk diameter size of eight inches or greater. None of the 122 on-site trees is considered to be protected by the City of Los Angeles Protected

[3] The Project Site consists of 25.84 acres when accounting for dedications and 25.9 acres prior to dedications.

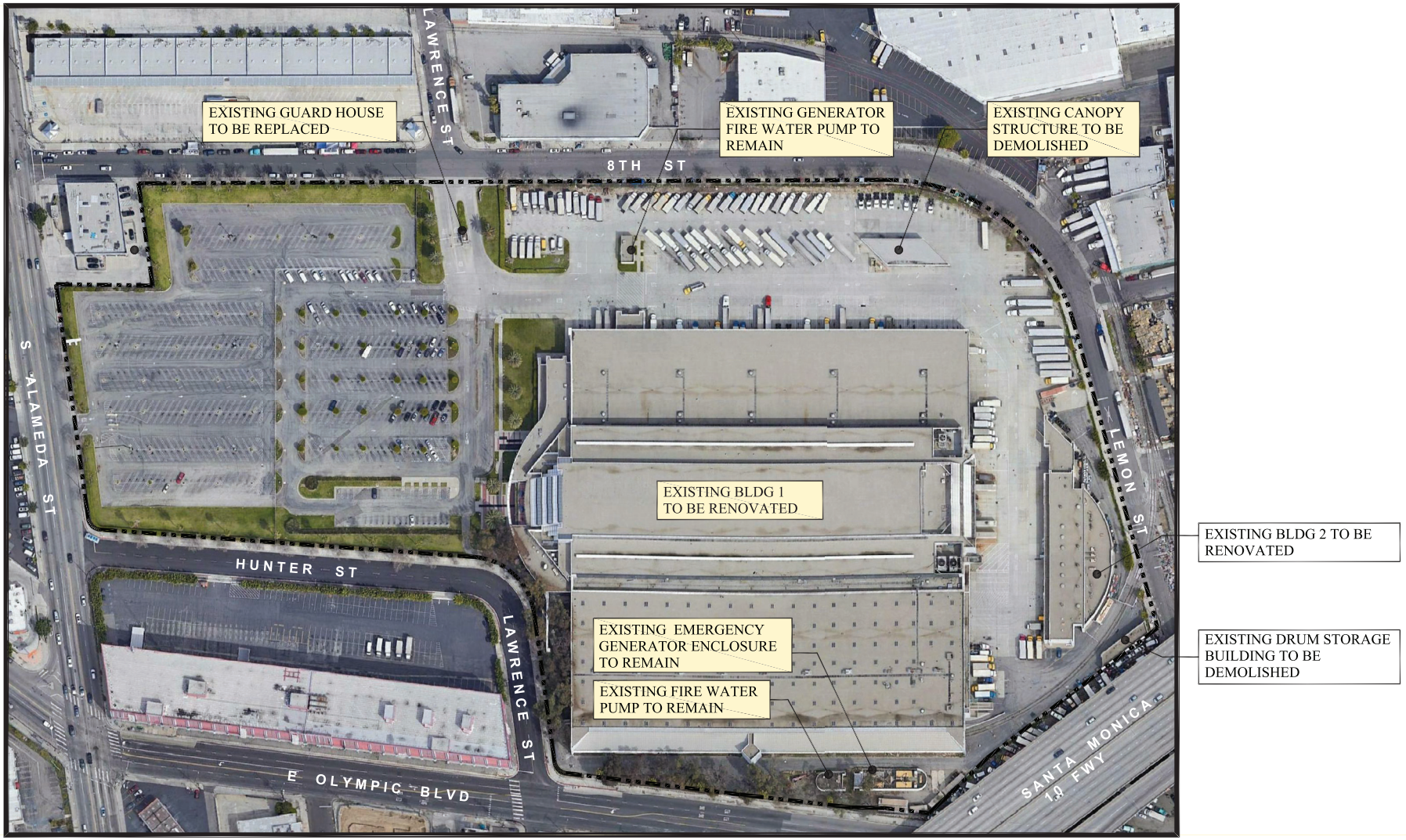

Figure 3
Existing Conditions of the Project Site

Source: Bastien and Associates, Inc., 2021.

Tree and Shrubs Ordinance No. 186,873.[4,5] Furthermore, any removal of street trees would require approval from the City of Los Angeles Bureau of Street Services.[6]

The Project Site is designated by the Central City North Community Plan as Industrial with the corresponding zones of M3-1-RIO (Heavy Industrial Zone, Height District 1 River Implementation Overlay District). The M3 zone permits a wide array of land uses such as storage yards, as well as office and commercial uses. The Height District 1 designation, in conjunction within the M3 Zone, does not impose a maximum building height limitation but does impose a maximum floor area ratio (FAR) of 1.5:1. The "RIO" designation indicates that the Project Site is located within the River Implementation Overlay District (RIO), which is designed to provide for preservation of tributaries and rivers in the City of Los Angeles by promoting river identity and supporting local species and convenient access, among many other aspects.

3.2.3 Surrounding Land Uses

The Project Site is located immediately north of I-10 and approximately 0.4 mile west of the Los Angeles River. The area surrounding the Project Site is highly urbanized and largely industrial, with warehouses, distribution facilities, shops, and factories in a range of scales and reflecting a wide variety of periods of construction. Some mixed-use and commercial properties are also present. Land uses immediately surrounding the Project Site include industrial uses to the north, west, and east; industrial and retail uses and I-10 to the south; and a restaurant to the southwest. These uses are located across from the Project Site, as divided by the various roadways which surround it. Among these uses, food warehouses and clothing manufacturing facilities are prominent. The topography of the area is flat.

The Project Site is also located near the Arts District, which is undergoing rapid transformation from a largely industrial area to incorporate more mixed use residential and commercial area. The Arts District continues to expand beyond its historic boundaries of 1st Street to the north, the Los Angeles River to the east, 6th Street to the south, and Alameda Street to the west. In particular, the Arts District is expanding south of 6th Street toward the I-10 Freeway with significant growth in mixed-use residential and commercial development. Former industrial and warehouse buildings that have been restored and converted to residential lofts and live-work spaces are prevalent throughout the Arts District, as are artist spaces and galleries, creative office and shared incubator spaces, coffee roasters, restaurants, breweries, and boutique retail shops. In addition, several ground-up residential and mixed-use developments have been built, are under construction, or are planned throughout the Arts District. As a Project which involves an industrial structure undergoing renovation for new commercial studio uses located in between 6th Street and the I-10 Freeway, the Project would reflect these changes to the historic boundaries of the Arts District and would therefore respond to the surrounding environment within the context of larger trends of development in the area.

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4 Carlberg Associates, City of Los Angeles Tree Inventory Report—8th & Alameda Project, 2000 East 8th Street, Los Angeles, California 90402, April 23, 2021. See Appendix IS-2 of this IS/MND.

5 Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

6 Carlberg Associates, City of Los Angeles Tree Inventory Report—8th & Alameda Project, 2000 East 8th Street, Los Angeles, California 90402, April 23, 2021. See Appendix IS-2 of this IS/MND.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

As summarized below and in Table 1 on page 13, the Project proposes the renovation of two existing buildings and the construction of new studio uses, support/office uses, a shops/office building, a nine-level above-ground parking structure, and three guard booths. Upon completion of the renovation and new construction, as shown in Figure 4 on page 14, the Project would provide 832,190 square feet of floor area and a floor area ratio (FAR) of up to 0.74:1. Table 2 on page 15 summarizes the Project program by building.

The Project would renovate the existing 558,918-square-foot Plant building and the 23,005-square-foot maintenance building. The Plant building, Building 1, would be reconfigured and would include the conversion of mechanical areas not counted as floor area by the LAMC to studio-related uses, which would be counted as floor area. With the reconfiguration, Building 1 would comprise 558,400 square feet of floor area. Figure 5 through Figure 7 on pages 17 through 19 provide the site plans for the ground level, mezzanine level, and second level, respectively, for Building 1. In total, Building 1 would provide 420,000 square feet on the ground level, 97,400 square feet at the mezzanine level, and 41,000 square feet on the second level. Uses provided by Building 1 would include: 11 sound stages totaling 156,100 square feet; 215,130 square feet of support/office space; 15,600 square feet of stage support uses; 55,400 square feet of offices; 17,000 square feet of post-production facilities; 59,670 square feet of mill/shop uses; a 15,500-square-foot fitness and health center; and 24,000 square feet of food services, including a 16,550-square-foot commissary, 5,800 square feet of outdoor dining, and a 1,700-square-foot café. In addition, the Project would renovate the existing maintenance building east of Building 1 and adjacent to Lemon Street in order to house grip and lighting uses. This renovated building, Building 2, shown in Figure 8 on page 20, would comprise 24,000 square feet of floor area.

The Project would remove a portion of the existing surface parking to construct three buildings with six sound stages and support/office uses. These buildings, Buildings 3, 4, and 5, would consist of 69,900 square feet, 68,400 square feet, and 69,900 square feet of floor area, respectively. The floor plans are shown in Figure 9 through Figure 17 on pages 21 through 29. Building 3 would be located in the southwestern portion of the Project Site directly west of Building 1 and adjacent to Hunter Street to the south. Building 3 would consist of two 19,400-square-foot sound stages, 1,500 square feet of stage support uses, and three stories of support/office uses totaling 29,600 square feet. Building 4 would be located in the western portion of the Project Site, adjacent to South Alameda Street to the west. Building 4 would consist of two 19,400-square-foot sound stages, 1,500 square feet of stage support uses, and three stories of support/office uses totaling 28,100 square feet. Building 5 would be located in the northwestern portion of the Project Site, adjacent to 8th Street to the north. Building 5 would consist of two 19,400-square-foot sound stages, 1,500 square feet of stage support uses, and three stories of support/office uses totaling 29,600 square feet.

In addition, as shown in Figure 18 and Figure 19 on pages 30 and 31, the Project would develop a new two-story shop/office building, Building 6. Building 6 would be located in the northern portion of the Project Site, adjacent to 8th Street to the north. Building 6 would consist of 41,400 square feet of floor area of which 20,700 square feet of mill/shops space would be located on the ground level and 20,700 square feet of office space would be located on the second level.

Table 1
Summary of Proposed Floor Area by Land Use[a]

Land Use	Proposed Development
Renovation	
Commissary	16,500 sf
Mezzanine Level Café	1,700 sf
Outdoor Dining[b]	5,800 sf
Support/Office	215,130 sf
Office	55,400 sf
Sound Stages	156,100 sf
Stage Support	15,600 sf
Fitness and Health Center	15,500 sf
Post Production Space	17,000 sf
Mill/Shops	59,670 sf
Grip and Lighting Storage	24,000 sf
Total Renovation	*582,400 sf*
New Construction	
Sound Stages	116,400 sf
Stage Support	4,500 sf
Support/Office	87,300 sf
Office	20,700 sf
Mill/Shops	20,700 sf
Guard Booths	190 sf
Total New Construction	*249,790 sf*
Total Renovation and New Construction	**832,190 sf**

sf = square feet

[a] *Square footage is calculated pursuant to the Los Angeles Municipal Code (LAMC) definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as "[t]he 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 for the landing and storage of helicopters, and basement storage areas."*

[b] *This does not include the 6,100 square feet of uncovered outdoor dining space, which is not considered as floor area.*

Source: Bastien and Associates, 2021.

The Project would also include three new guard booths, Guard Booths 7A, 7B, and 7C. Guard Booth 7A would be a 100-square-foot main guard booth, Guard Booth 7B would be a 40-square-foot pedestrian guard booth, and Guard Booth 7C would be a 50-square-foot truck guard booth. Guard Booths 7A and 7B would be located in the northern portion of the Project Site, adjacent to 8th Street to the north, at the main gate, while Guard Booth 7C would be located at the proposed truck entrance in the southeastern corner of the Project Site, adjacent to Lemon Street to the east.

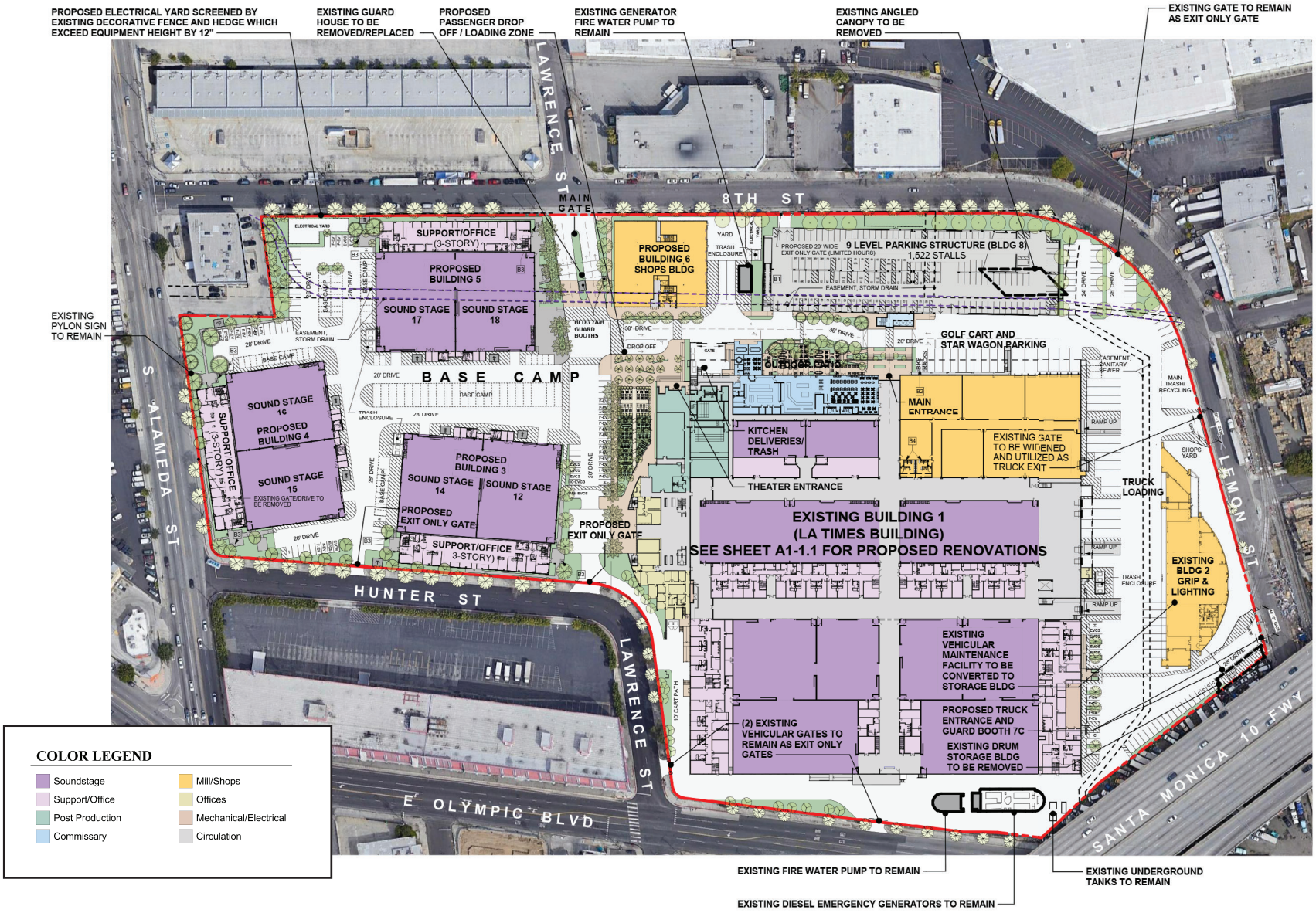


Figure 4
Conceptual Site Plan

Source: Bastien and Associates, Inc., 2021.

Table 2
Summary of Proposed Floor Area by Building[a]

Land Use	Proposed Development
Building 1	
Sound Stages	156,100 sf
Support/Office	215,130 sf
Stage Support	15,600 sf
Office Suites	55,400 sf
Post Production Space	17,000 sf
Mill/Shops	59,670 sf
Fitness and Health Center	15,500 sf
Outdoor Dining[b]	5,800 sf
Commissary	16,500 sf
Mezzanine Level Café	1,700 sf
Subtotal	*558,400 sf*
Building 2	
Grip and Lighting Storage	*24,000 sf*
Building 3	
Sound Stages	38,800 sf
Stage Support	1,500 sf
Support/Office	29,600 sf
Subtotal	*69,900 sf*
Building 4	
Sound Stages	38,800 sf
Stage Support	1,500 sf
Support/Office	28,100 sf
Subtotal	*68,400 sf*
Building 5	
Sound Stages	38,800 sf
Stage Support	1,500 sf
Support/Office	29,600 sf
Subtotal	*69,900 sf*
Building 6	
Mill/Shops	20,700 sf
Office	20,700 sf
Subtotal	*41,400 sf*
Guard Booths	
Guard Booth 7A	100 sf
Guard Booth 7B	40 sf
Guard Booth 7C	50 sf
Subtotal	*190 sf*
Building 8	
Parking Structure	1,522 spaces

sf = square feet

Table 2 (Continued)
Summary of Proposed Floor Area by Building

Land Use	Proposed Development
[a] *Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as "[t]he 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 for the landing and storage of helicopters, and basement storage areas."*	
[b] *This does not include the 6,100 square feet of uncovered outdoor dining space, which is not considered as floor area.*	
Source: Bastien and Associates, 2021.	

The uses within the Project Site would be supported by 1,522 vehicle parking spaces within a newly constructed nine-level, above-ground parking structure, Building 8, and 143 surface vehicle parking spaces. The Project would also provide 58 bicycle parking spaces (25 short-term and 33 long-term). The 33 long-term bicycle parking spaces would be provided in the parking structure. Of the 25 short-term bicycle parking spaces, 13 spaces would be located in a covered overhang near the entrance to Building 1, and four open air spaces would be located adjacent to each of Buildings 3, 4, and 5.

In addition, the Project would include basecamp areas, as shown in Figure 4 on page 14. Basecamps are areas that are leased out to various production companies for parking their larger vehicles. Traditionally, these vehicles include trailers for talent (star wagons), production vehicles, golf carts, grip and lighting trucks, special makeup, wardrobe or hair trucks, etc. If a production company were to bring in their own food, they would set up in the basecamp.

Finally, the Project would demolish three existing ancillary structures, including an existing guard house, a drum storage building, and an angled canopy that once covered a fueling station that has since been demolished. The three existing ancillary structures, including a pump house/waste storage building, a pump room, and a curving walled enclosure with an emergency generator and other equipment, would remain in place and not be affected by, or be part of the Project.

Floor Area Ratio (FAR)

The Project Site is designated by the Central City North Community Plan as Industrial with the corresponding zones of M3-1-RIO (Heavy Industrial Zone, Height District 1 River Implementation Overlay District). The M3 zone permits a wide array of land uses such as storage yards, offices, and commercial uses. The Height District 1 designation, in conjunction within the M3 Zone, does not impose a maximum building height limitation, but it does impose a maximum FAR of 1.5:1. The "RIO" designation indicates that the Project Site is located within the River Implementation Overlay District (RIO), which is designed to provide for preservation of tributaries and rivers in the City of Los Angeles by promoting river identity and supporting local species and convenient access, among many other aspects. Including the existing Plant and maintenance building to be retained and rehabilitated, the Project would result in up to 832,190 square feet of floor area with a maximum floor area ratio (FAR) of up to 0.74:1, and therefore would comply with the existing FAR limit of 1.5:1.

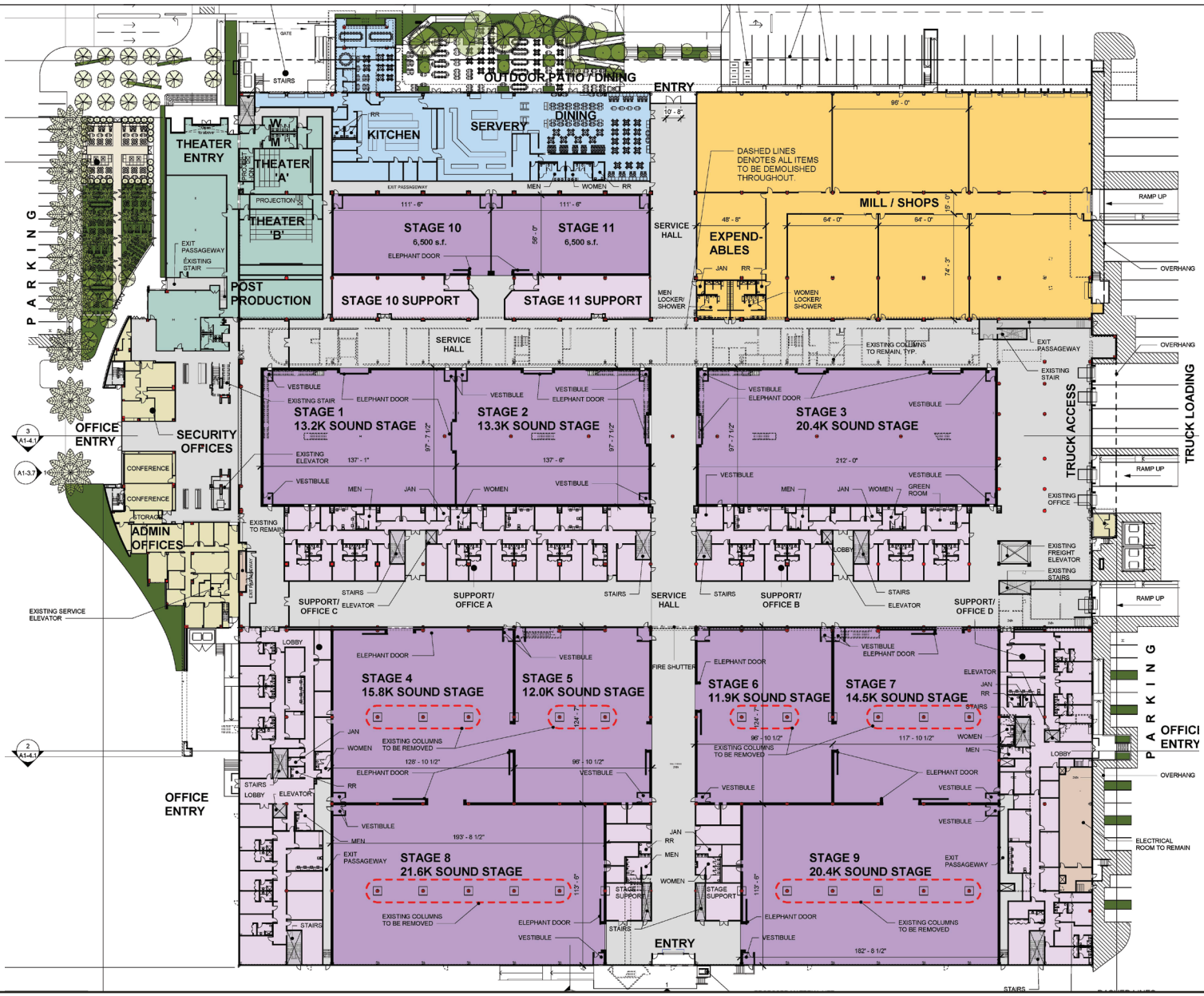


Figure 5

Building 1--Ground Floor Plan

Source: Bastien and Associates, Inc., 2021.

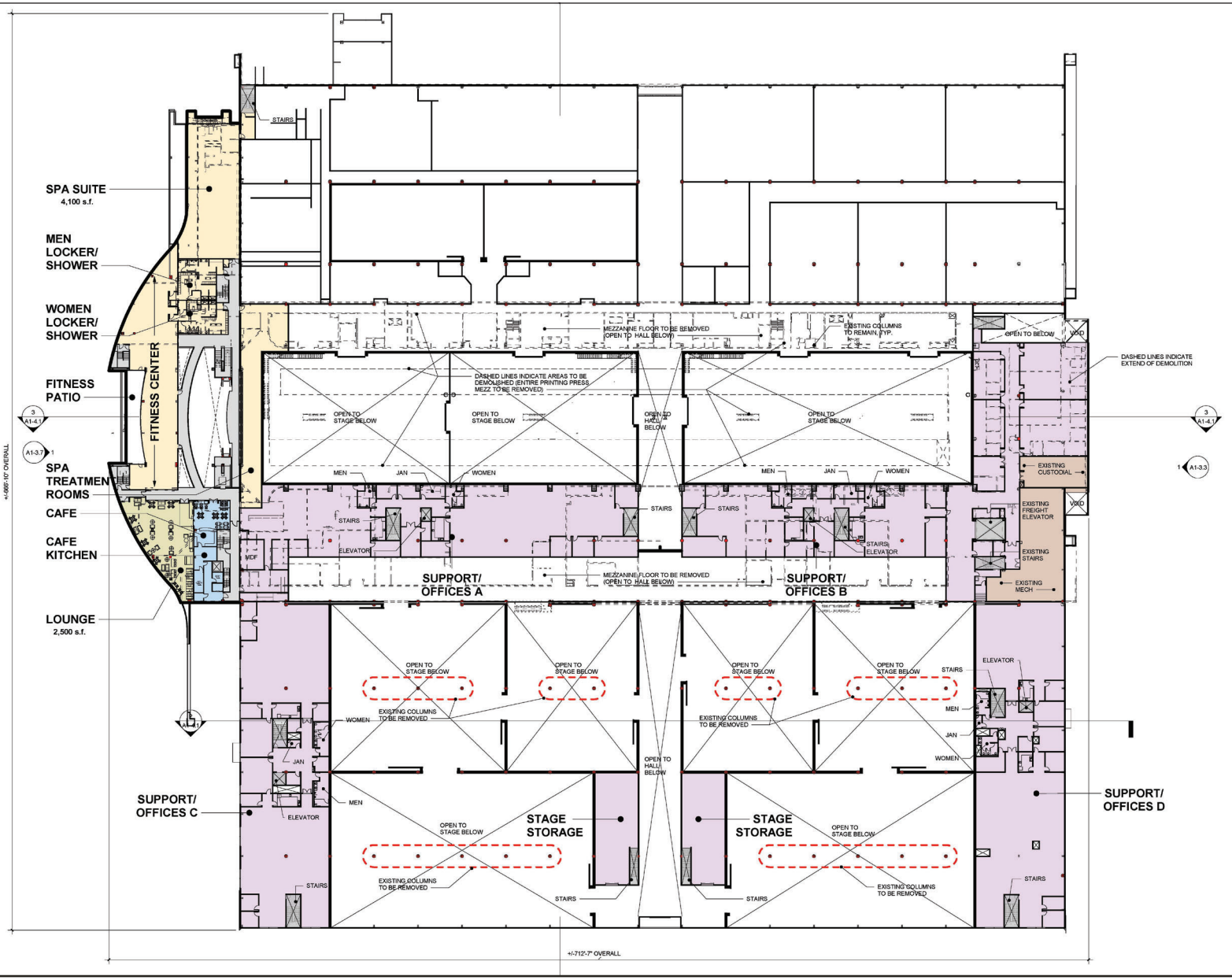


Figure 6
Building 1--Mezzanine Floor Plan

Source: Bastien and Associates, Inc., 2021.

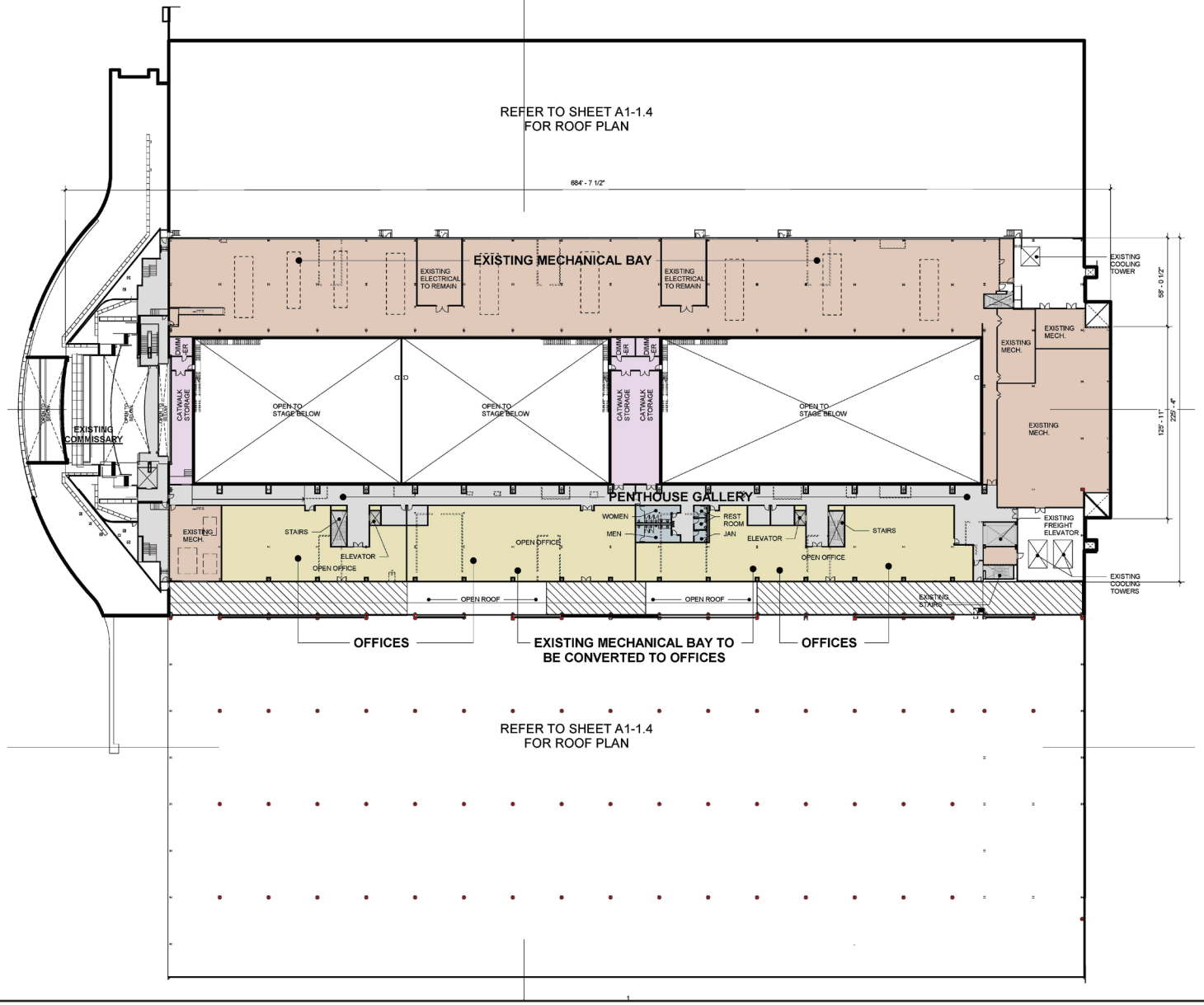


Figure 7
Building 1--Second Floor Plan

Source: Bastien and Associates, Inc., 2021.

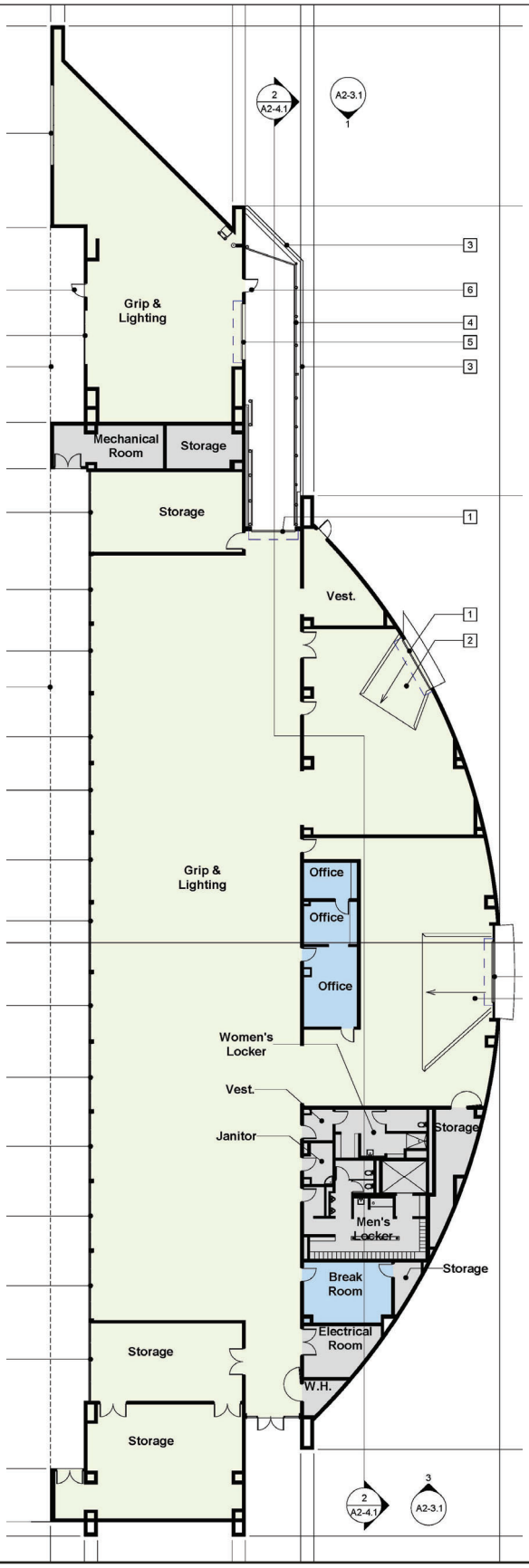


Figure 8
Building 2--Floor Plan

Source: Bastien and Associates, Inc., 2021.

Figure 9
Building 3--Ground Floor Plan

Source: Bastien and Associates, Inc., 2021.

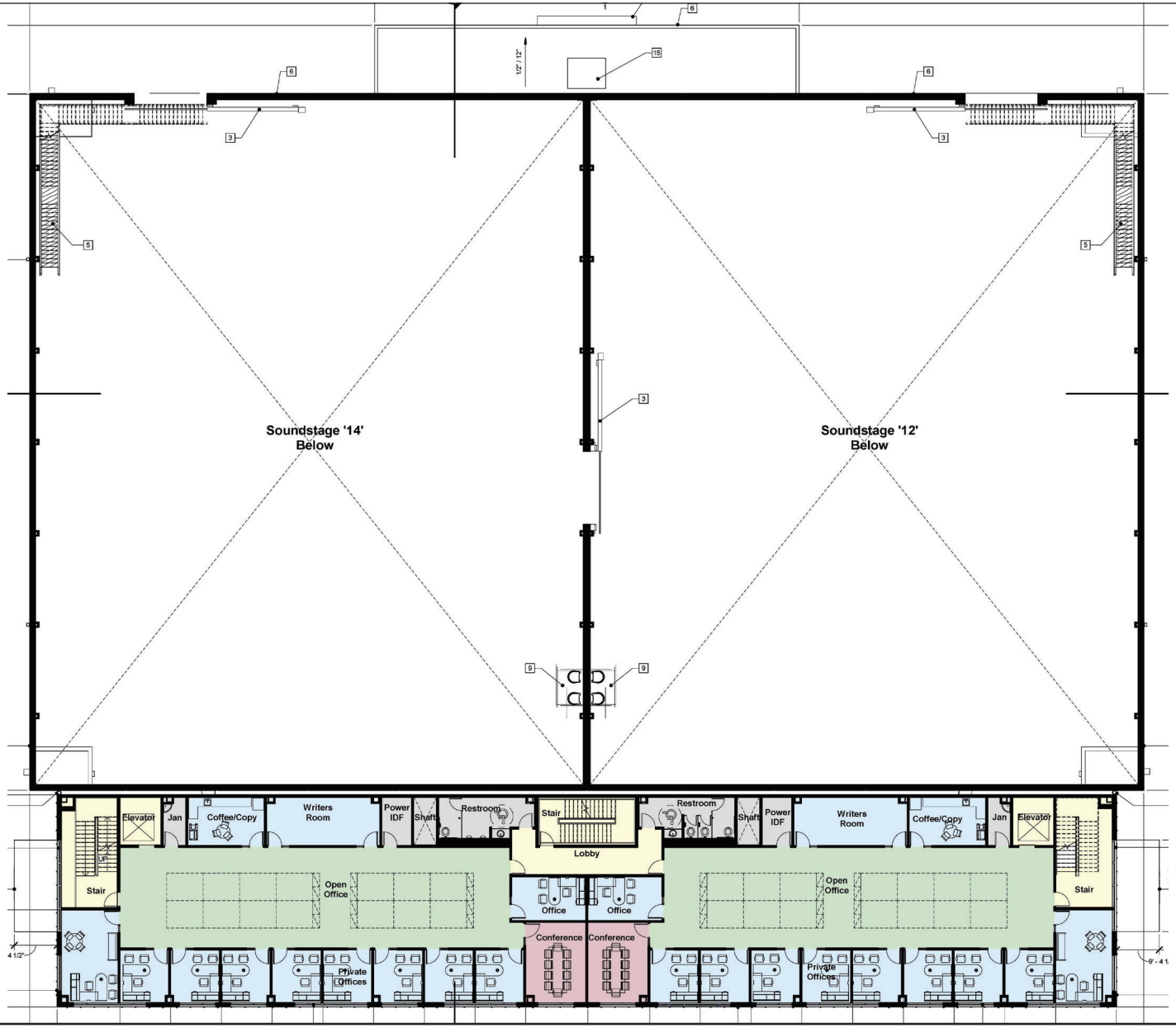


Figure 10
Building 3--Second Floor Plan

Source: Bastien and Associates, Inc., 2021.

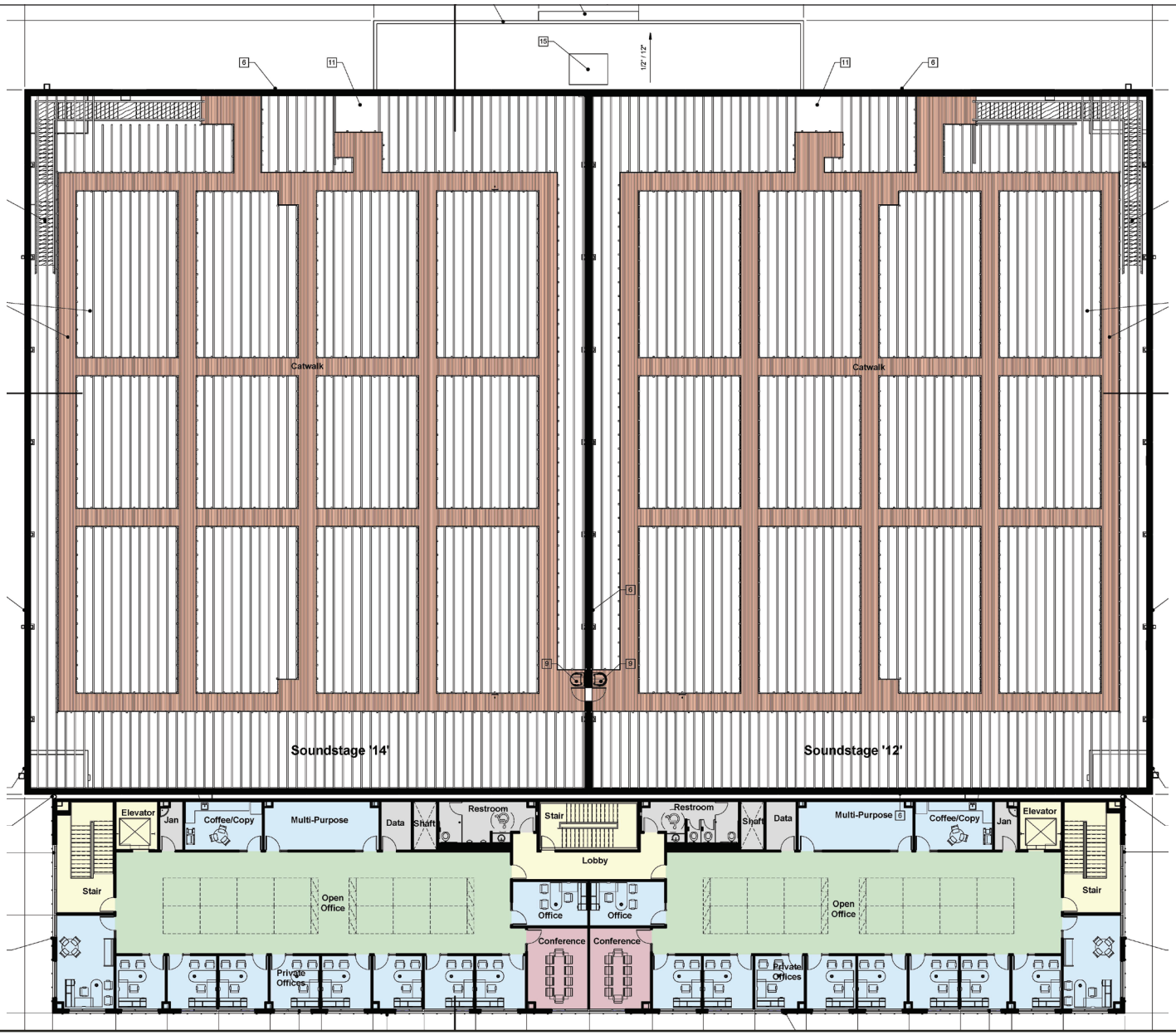


Figure 11
Building 3--Third Floor Plan

Source: Bastien and Associates, Inc., 2021.

Figure 12
Building 4--Ground Floor Plan

Source: Bastien and Associates, Inc., 2021.

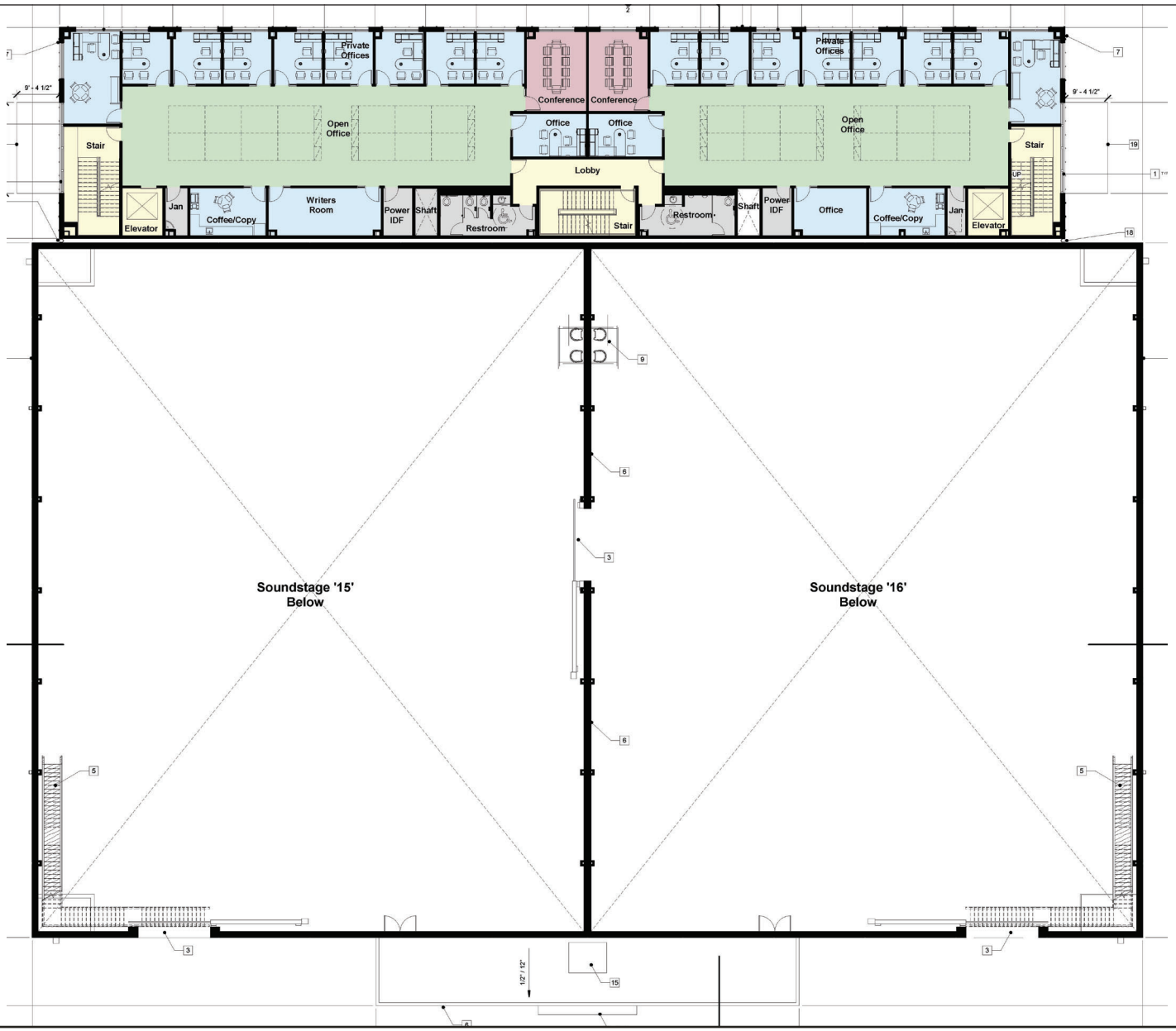


Figure 13
Building 4--Second Floor Plan

Source: Bastien and Associates, Inc., 2021.

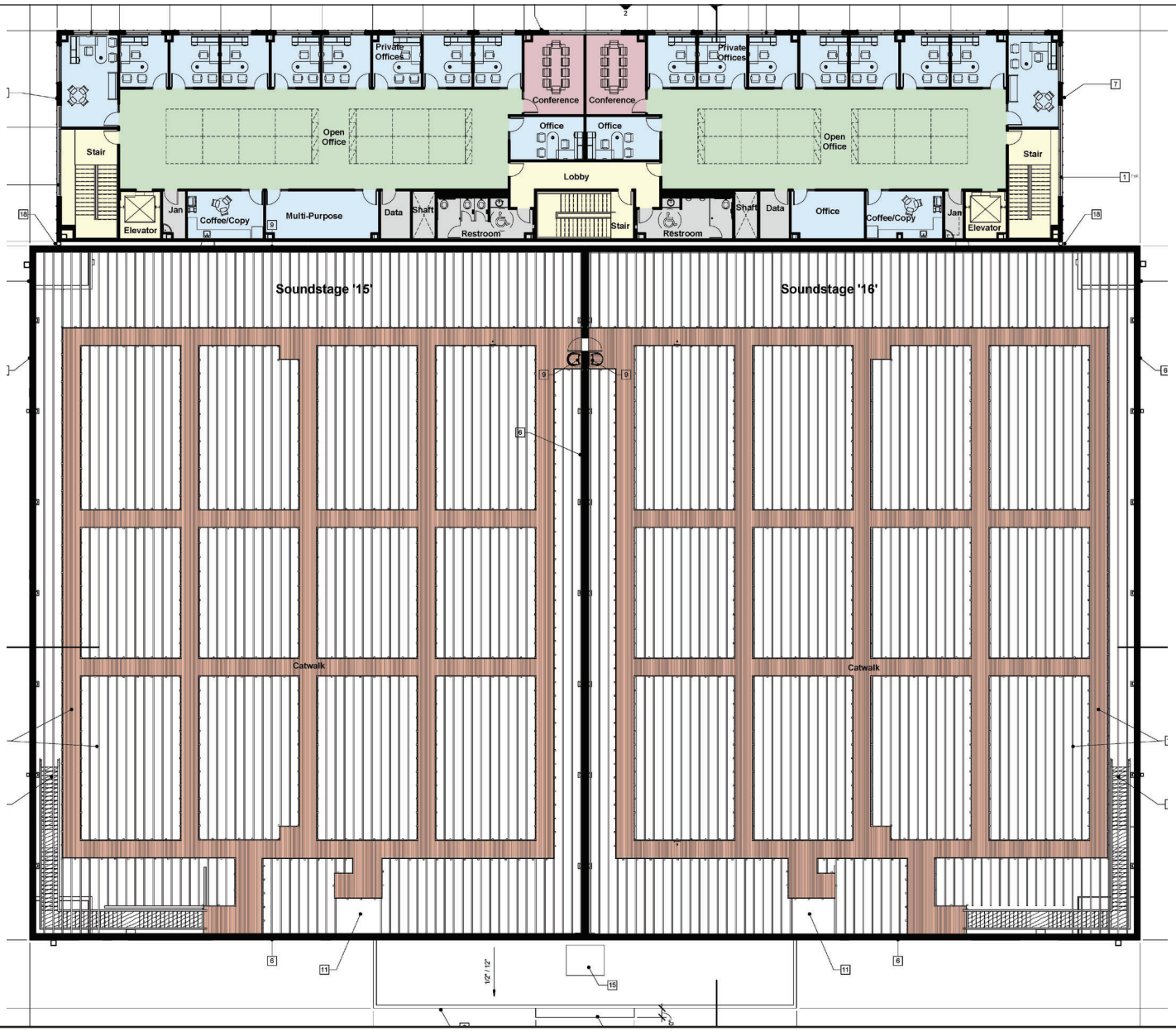


Figure 14
Building 4--Third Floor Plan

Source: Bastien and Associates, Inc., 2021.

Figure 15
Building 5--Ground Floor Plan

Source: Bastien and Associates, Inc., 2021.

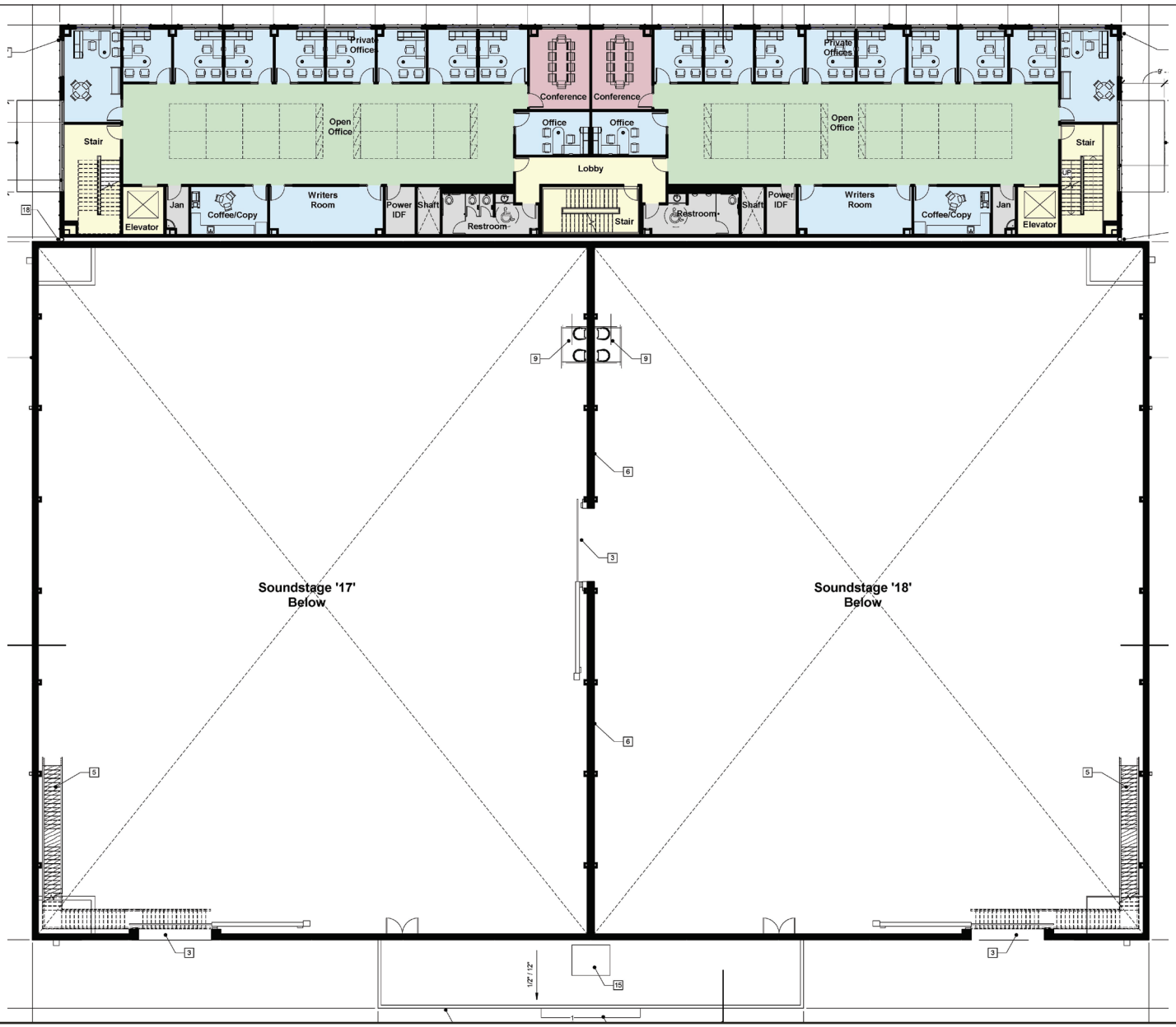


Figure 16
Building 5--Second Floor Plan

Source: Bastien and Associates, Inc., 2021.

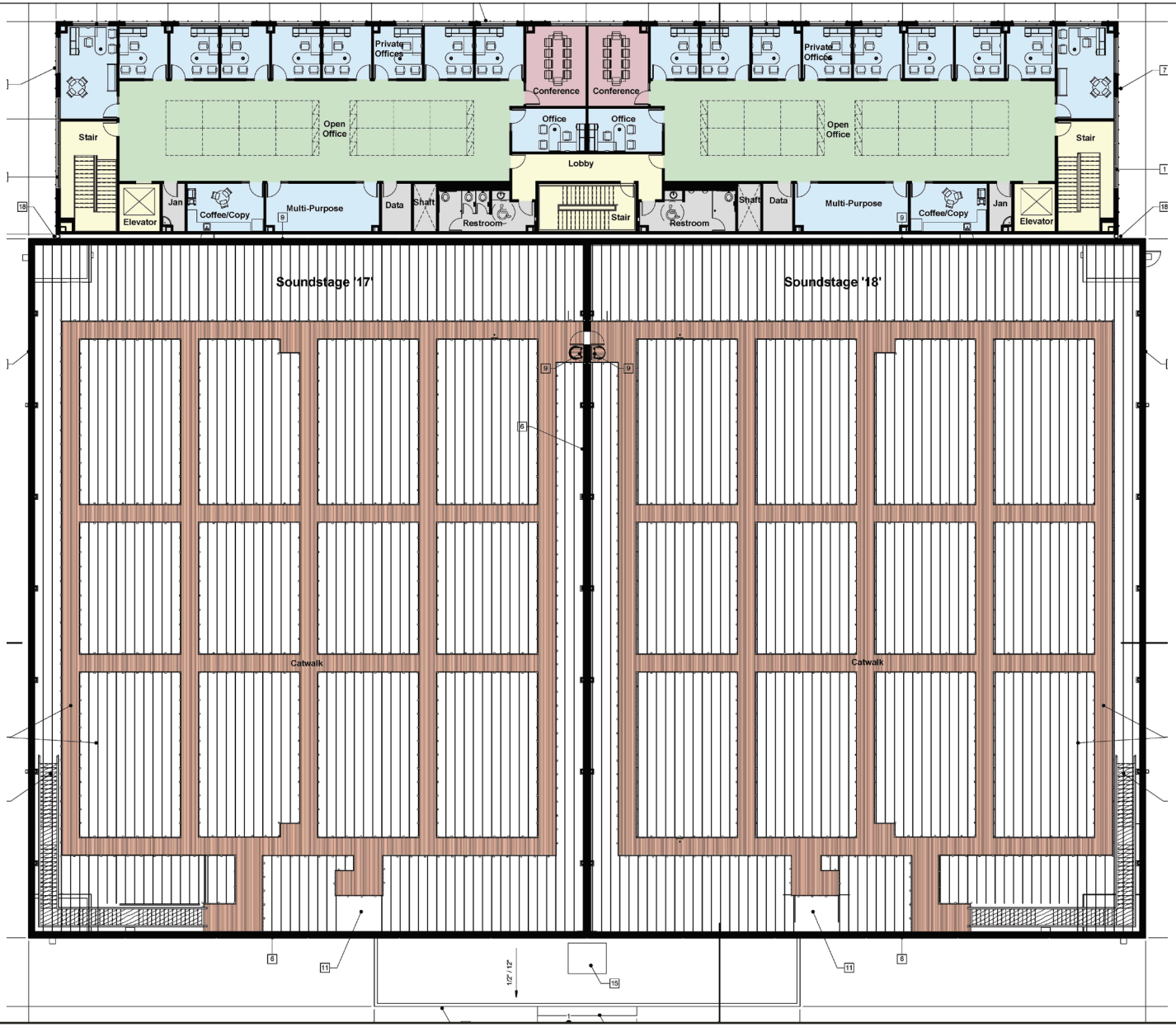


Figure 17
Building 5--Third Floor Plan

Source: Bastien and Associates, Inc., 2021.

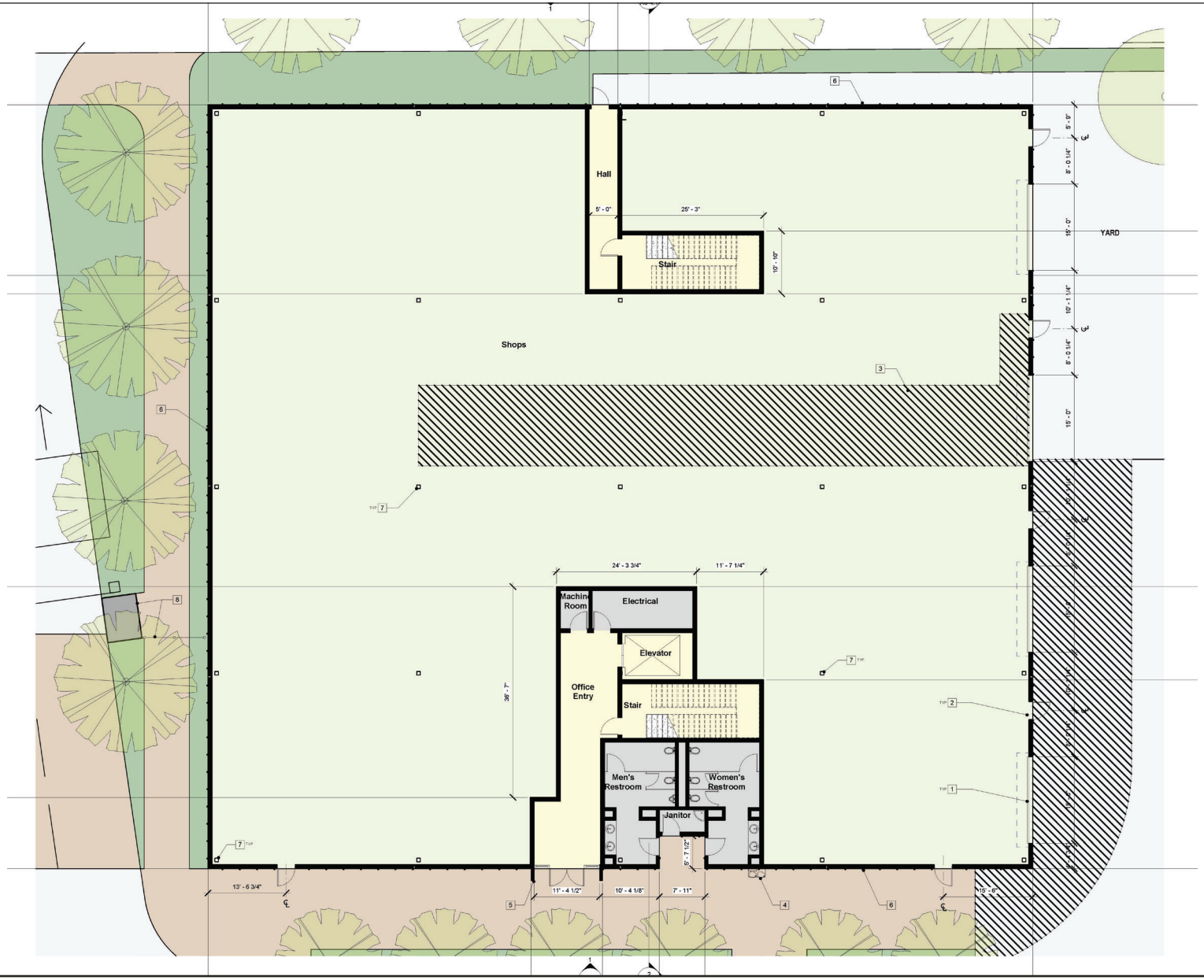


Figure 18
Building 6--Ground Floor Plan

Source: Bastien and Associates, Inc., 2021.

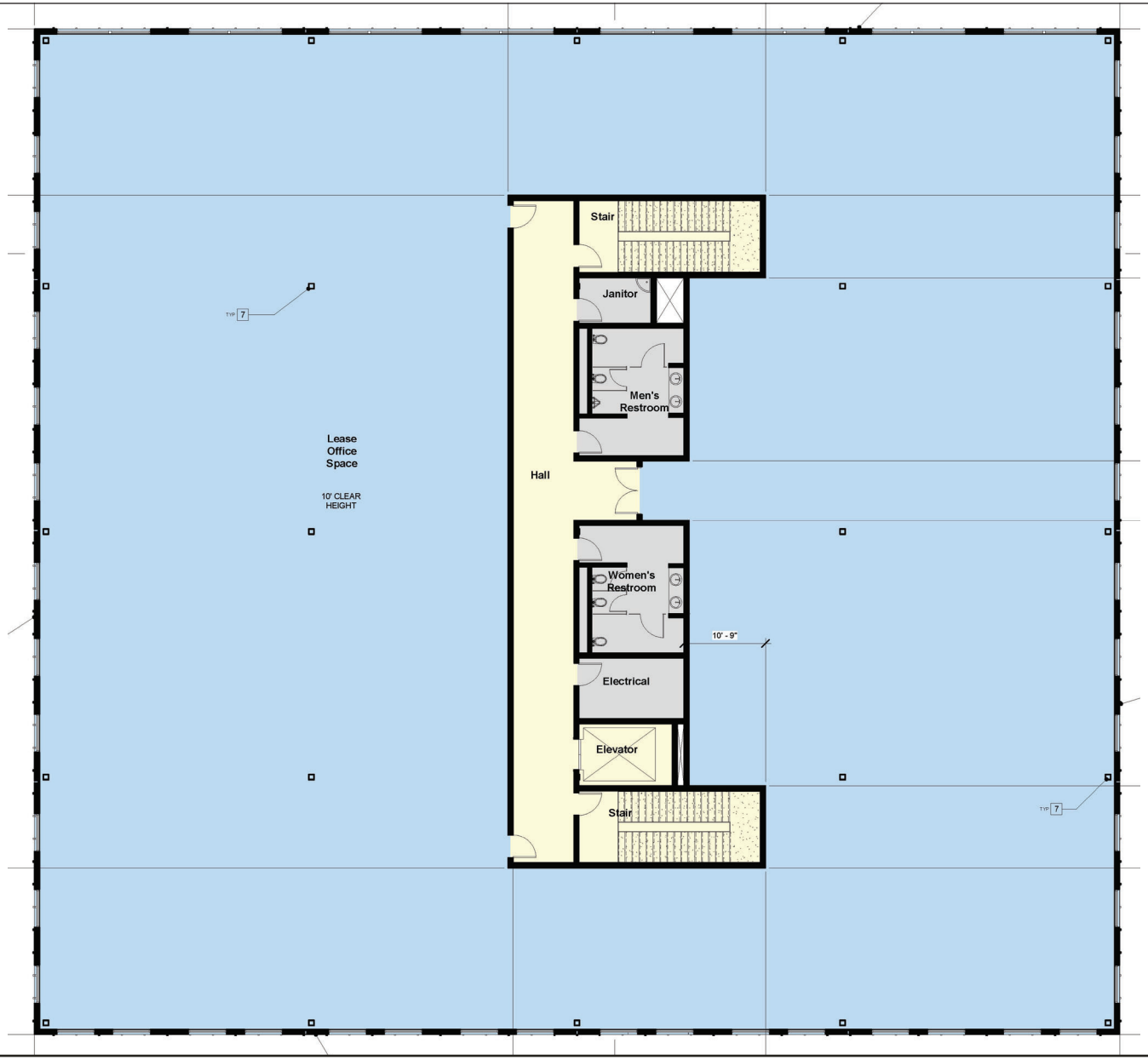


Figure 19
Building 6--Second Floor Plan

Source: Bastien and Associates, Inc., 2021.

Height

Again, there is no building height limit within the M3-1-RIO zone. Building 1 would include two levels and a mezzanine level and would reach a maximum height of 73 feet, 4 inches when accounting for additional projections (i.e., stairwell and elevator penthouses, mechanical enclosures, etc.). Building 2 would include one level and would reach a maximum height of 28 feet, 6 inches when accounting for additional projections. Buildings 3, 4, and 5 would each include three levels and would each reach a maximum height of 64 feet, 11 inches when accounting for additional projections. Building 6 would include two levels and would reach a maximum height of 38 feet, 6 inches when accounting for additional projections. The parking structure identified as Building 8 would reach a maximum height of 106 feet, 3 inches.

Setbacks

No setbacks are required within the M3 zone. Nevertheless, the Project would provide setbacks on South Alameda Street, 8th Street, and Hunter Street. Specifically, the Project would include an 8-foot 10.5-inch setback from Building 4 on South Alameda Street. On 8th Street, the Project would include an 8-foot 10.5-inch setback from Building 5, a 9-foot 1.25-inch setback from Building 6, and a 15-foot 11-inch setback from Building 8. Lastly, the Project would include an 8-foot 10.5-inch setback from Building 3 on Hunter Street.

3.3.2 Design and Architecture

Through its design and adaptive reuse of existing structures and construction of a creative studio campus, the Project both incorporates and reflects the industrial history of the site and the context of the nearby Arts Districts. The Project preserves and repurposes the two main, existing structures while positioning the five new buildings along the perimeter of the site. This strategy places the majority of surface parking and all of the stage loading areas in the central area of the site that is screened from public view. Figure 20 through Figure 22 on pages 33 through 35 illustrate the Project from 8th Street, Alameda Street & Hunter Street, and 8th Street & Alameda Street. The new buildings are oriented along 8th, Alameda and Hunter Streets with glazed street frontages to best engage the surrounding neighborhoods. The three-story support buildings are clad in dark, standing seam metal façades while the sound stages are designed with long-span, barrel vault roof forms evoking the industrial heritage of the Arts District. In addition, the new buildings would include limited use of glass and would be surrounded by landscaping 10 feet above grade such that there would be no potential reflectiveness that could affect any cars and pedestrians at the ground level.

A graduated color scheme allows the dark colors along the street to transition to white toward the center of the site. The white colors found at the rear of the new buildings complement the existing 1980s buildings which are wrapped in white metal panels. In addition, the parking structure utilizes contrasting diagonal shapes printed on perforated metal panels to reduce its scale and relate to the color used in the other buildings on site. Yellow accents in the parking structure and production buildings define circulation and entry points to further unite the campus and aid with wayfinding. To complement the white metal panel system of Buildings 1 and 2, much of the Project's existing concrete masonry unit (CMU) sections are painted dark gray or carry a large-scale diagonal gray and white striping pattern, similar to the new parking structure.

Figure 20
Conceptual Rendering of Main Entrance on 8th Street

Source: Bastien and Associates, Inc., 2021.

Figure 21
Conceptual Rendering Looking Northeast at
Alameda Street & Hunter Street

Source: Bastien and Associates, Inc., 2021.

Figure 22
Conceptual Rendering Looking Southeast from
8th Street & Alameda Street

Source: Bastien and Associates, Inc., 2021.

3.3.3 Open Space and Landscaping

The Project would create both indoor and outdoor open space and recreational amenities for tenants. Specifically, the Project would include an indoor 15,500-square-foot fitness and health center as well as lounge/seating areas. The Project would also include 122,010 square feet of open space, including a 5,800-square-foot outdoor dining patio on the northwestern border of Building 1 and a 6,100-square-foot outdoor dining patio on the western border of Building 1. As shown in Figure 23 and Figure 24 on pages 37 and 38, landscaping would be located throughout the Project Site near the outdoor patios and bordering the buildings and parking areas.

Of the 122 existing trees located on-site, 28 would be relocated, 69 would be removed, and 25 trees would remain in place. The Project would plant 164 new on-site trees in accordance with requirements of the City of Los Angeles Landscape Ordinance 170,978. As such, at buildout, a total of 217 trees would be located onsite. Of the 51 existing street trees, five trees would be removed, 46 street trees would be retained. The Project would plant 19 new street trees. As such, following approval from the Bureau of Street Services and Urban Forestry Division, a total of 65 trees would be located in the public right-of-way at buildout.

3.3.4 Access, Circulation, and Parking

The main vehicular access to the Project Site would continue to be located to the north along 8th Street where the Project would provide a full access driveway, the main guard booth (Guard Booth 7A), and a pedestrian guard booth (Guard Booth 7B). A passenger drop-off zone would be located within the Project Site just beyond this main entrance. A secondary exit-only driveway from the vehicle parking areas of Building 8 would also be provided along 8th Street. In addition, the Project would provide two exit-only driveways along Hunter Street. The existing exit gates along Lawrence Street and Olympic Boulevard would not be changed by the Project; however, the gates would not be utilized for regular vehicular access.

The Project would provide separate truck access points along Lemon Street. Specifically, a truck guard booth (Guard Booth 7C) and truck entrance would be added within the southeast corner of the Project Site on Lemon Street. Trucks would then exit onto Lemon Street via an existing gate that would be widened as part of the Project.

A delivery/loading zone is also proposed along Lawrence Street in the southwest portion of the Project Site.

Pedestrian access to the Project Site would be provided via entrances along 8th Street. In addition, the Project would be designed in compliance with Americans with Disabilities Act (ADA) standards to provide accessibility for all patrons of the Project.

With regard to vehicle parking, Building 8 would be a nine-level parking structure including 1,522 parking spaces located in the northeastern portion of the Project Site, adjacent to 8th Street to the north. Of the 1,522 parking spaces, 153 spaces would provide Electric Vehicle Charging Stations (EVCS) and 304 spaces would be prewired to accommodate the placement of future EVCS. The Project would also include 143 surface parking spaces located throughout the Project Site, including 15 EVCS parking spaces and 28 Future EVCS parking spaces.

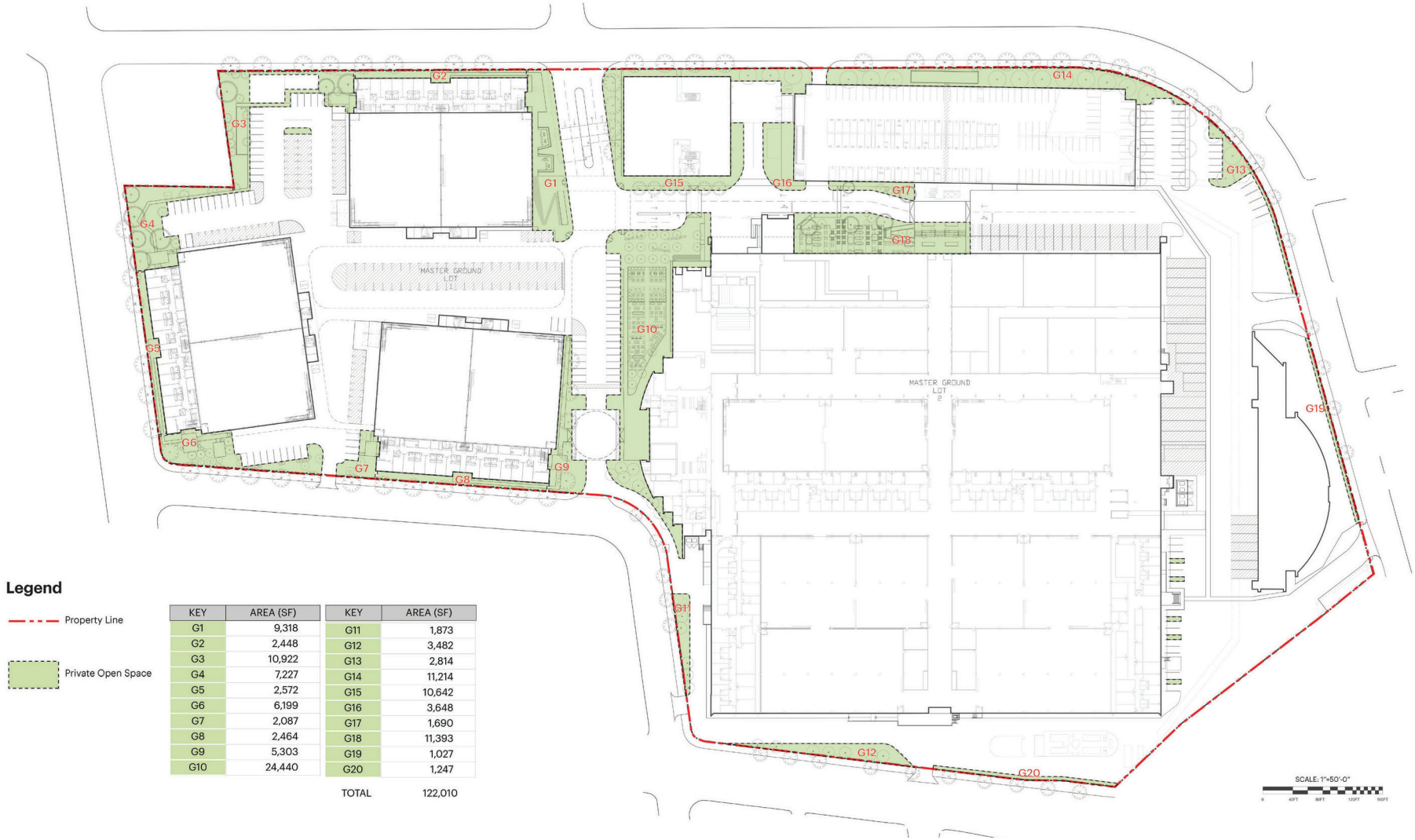
8th & Alameda Landscape Point System

Features/Techniques	Points/ Unit	Quantity Provided	Points Provided
1. Street Trees to shade the street			
large tree, per tree (Any tree more than 60 foot tall at maturity)	2	77	154
40' on center maximum, per tree	1	27	27
30' on center maximum, per tree	2		0
street trees planted larger than 15 gallon size (per tree in addition to points earned above)			
24" box	1		0
36" box	2	62	124
9. Site Design			
provision to trees shading east or west sides of building in other than the A, R or OS zones (per 25' of exposure or faction thereof)	2	38	76
conservation of existing trees (per tree not street trees)	2	51	102
provision for on- or off-site recycling of all vegetative waste (Section 12.43 G of the Los Angeles Municipal Code)	5	1	5
12. Bonus Points			
free-flowering street trees or free-flowering vines or espaliered plants on walls/fences	5	1	5
		Total Points Provided	493
		Total Project Area (SF)	1,126,661
		Total Points Required (60 pts per 150,000 sf)	450

NOTE: REFER TO ARCHITECTURAL PLANS FOR PARKING STRIPING, BUILDING DIMENSIONS, OUTDOOR FURNITURE LAYOUT, OUTDOOR SEATING CAPACITY, & ABC BARRIERS.

Figure 23
Conceptual Landscape Plan

Source: Rios, 2021.



Legend

Property Line

Private Open Space

KEY	AREA (SF)	KEY	AREA (SF)
G1	9,318	G11	1,873
G2	2,448	G12	3,482
G3	10,922	G13	2,814
G4	7,227	G14	11,214
G5	2,572	G15	10,642
G6	6,199	G16	3,648
G7	2,087	G17	1,690
G8	2,464	G18	11,393
G9	5,303	G19	1,027
G10	24,440	G20	1,247
		TOTAL	122,010

Figure 24
Conceptual Open Space Diagram

Source: Rios, 2021.

With regard to bicycle parking, the Project would provide 58 bicycle parking spaces consisting of 25 short-term and 33 long-term spaces. The 33 long-term bicycle parking spaces would be provided in the parking structure. Of the 25 short-term bicycle parking spaces, 13 spaces would be located in a covered overhang near the entrance to Building 1, and four open air spaces would be located adjacent to each of Buildings 3, 4, and 5. A bicycle repair station and shower facilities for cyclists would also be located on-site.

3.3.5 Lighting and Signage

Proposed signage would include mounted Project identity signage, general ground-level and wayfinding pedestrian and vehicular signage, and security markings in compliance with code requirements. Project identity signage would be visible from off-site vehicular and pedestrian traffic and serve as identifiers for the Project. Wayfinding signs would be located at the parking garage entrances and exits, at building lobbies, on the interior-facing faces of stages, and on the ground level throughout the Project Site, and would be integrated into the overall design of the campus. In addition, signage for the display of on-site productions would be proposed throughout the Project Site on the exterior of buildings fronting the public right-of-way. No digital and off-site signage would be provided. All proposed signage would be designed to be aesthetically compatible with the existing and proposed architecture of the Project Site and would comply with all LAMC and sign ordinances.

All Project lighting would comply with current energy standards and codes while providing efficient and effective on-site lighting for the operation of a film and television studio. Low-level exterior lights would be provided to accent signage, on-site production display signage, architectural features, and landscaping elements. In addition, low-level exterior lights would be located adjacent to the proposed buildings, along pathways and the Project Site perimeter for aesthetic, security, and wayfinding purposes. Light sources would be shielded and/or directed toward the Project Site to minimize light spill to neighboring buildings and surrounding areas, and to reduce sky-glow and glare in order to improve nighttime visibility. The Project would comply with City conditions for new or relocated streetlights.

3.3.6 Site Security

During construction, the Project Applicant would implement temporary security measures including security fencing, lighting, and locked entry. Upon completion of the Project and prior to the issuance of a certificate of occupancy, the Project Applicant would submit a diagram of the Project Site to the LAPD's Newton Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

During operation, the Project's Guard Booths 7A, 7B, and 7C would provide security for the Project Site. In addition, the Project would include a closed circuit camera system and keycard entry. The Project would provide proper lighting of buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. The Project would also provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment. Furthermore, the Project would design building entrances and exits, open spaces, and pedestrian walkways to be open and in view of surrounding sites.

3.3.7 Sustainability Features

The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction standards required by the Los Angeles Green Building Code and CALGreen. These features and standards would reduce the Project's energy and water usage and waste and would thereby also reduce the Project's associated greenhouse gas emissions and help minimize its impacts on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but would not be limited to, the following: EVCS; material recycling stations; efficient HVAC systems; energy-efficient wall insulation and glazing units; high efficiency dual-flush toilets with a flush volume of 1.28/1.1 gallons per flush, or less, high efficiency hybrid urinals, showerheads with a flow rate of 1.5 gallons per minute or less, and drip irrigation systems to promote reductions in indoor and outdoor water usage; Energy Star–labeled appliances; and water-efficient landscape design (i.e., grouping plants according to their water needs, use of native and low-water plants, etc.). In addition, the Project would provide domestic water heating systems located in close proximity to point(s) of use and individual metering and billing for water use.

In addition, the Project would include energy-efficient lighting technologies and fenestration designed for solar orientation. In accordance with CALGreen requirements, the Project would also ensure that at least 10 percent of the total roof area of the new building would be solar-ready. Specifically, the Project would provide a 500 kW photovoltaic system on the northeast corner of Building 1. Furthermore, the Project would provide parking spaces prewired to support future EVCS as well as parking spaces equipped with EVCS. Pursuant to City of Los Angeles Ordinance 186,485 and Ordinance 186,488, 30 percent of the parking spaces in the Project would be capable of supporting future EV supply equipment. Additionally, 10 percent of spaces are required to have EVCS.

3.3.8 Anticipated Construction Schedule

Project construction activities would include site preparation and demolition of the three existing ancillary structures (i.e., an existing guard house, a drum storage building, and an angled canopy), followed by grading and utility work, paving, building renovation and construction, and architectural coatings. The maximum depth of footings for the proposed parking structure, Building 8, would be 55 feet below grade. The depth of excavation associated with the grip and lighting building, Building 2, would be 5 feet below grade. Grading activities would require approximately 20,000 cubic yards of soil export. Construction is anticipated to occur over a 34-month period, with completion expected in 2026. Regarding the anticipated haul route for the Project, loaded haul trucks would exit the Project gate at Hunter Street/Lawrence Street, make a left turn onto Lawrence Street, left onto Olympic Boulevard, and right onto I-10 Freeway. An alternate route for haul trucks leaving the Project Site would consist of the following: trucks exit from the Project's main gate, left onto 8th Street, left onto Alameda Street, left onto Olympic Boulevard and right onto the I-10 Freeway. Empty haul trucks coming to the Project Site would travel westbound on I-10 Freeway, exit 14th Street, right onto Alameda Street heading north, right onto 8th Street and right onto Project Site. Construction would require approximately 4,250 cubic yards of total soil export and no soil import.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Environmental Impact Report will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary

entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- **Vesting Tentative Tract Map.** Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map for a merger and subdivision resulting in two ground lots and 3 airspace lots, and to remove 2 street trees along 8th Street and 3 street trees along Hunter Street.

- **Site Plan Review.** Pursuant to LAMC Section 16.05, the Applicant requests Site Plan Review to allow the Project's renovation and change of use of the existing Plant to approximately 582,400 square feet of sound stage, production support, office and ancillary uses and the construction of new buildings would provide approximately 249,790 square feet of sound stage, production support, office and ancillary uses.

- **Conditional Use Permit for a Major Development Project.** Pursuant to LAMC Section 12.24-U.14, the Applicant requests a Conditional Use Permit for a Major Development Project to allow the renovation and change of use of the existing Plant to approximately 582,400 square feet of sound stage, production support, office and ancillary uses and the construction of new buildings would provide approximately 249,790 square feet of sound stage, production support, office and ancillary uses.

- **Main Conditional Use Permit for Alcoholic Beverages** pursuant to LAMC Section 12.24 W.1 to allow:

  - The sale and dispensing of a full line of alcoholic beverages for on-site consumption within the Commissary and Outdoor Dining Area A and the Topiary Garden (Outdoor Dining Area B), between the hours of 7 A.M. and 2 A.M. daily. The Commissary is approximately 16,500 square feet with 333 seats, Outdoor Dining Area A is approximately 5,800 square feet with 286 seats, and the Topiary Garden is approximately 6,100 square feet with 396 seats. The Commissary with the Topiary Garden has a total of 1,015 indoor and outdoor seats.

  - The sale and dispensing of beer and wine for on-site consumption within the Mezzanine Café between the hours of 7 A.M. and 12 A.M. daily. The Mezzanine Café is 1,700 square feet with 33 indoor seats.

  - The sale and dispensing of a full line of alcoholic beverage throughout the entire site (except in the Commissary and the Topiary Garden), between the hours of 7 A.M. and 2 A.M. daily. The overall Site would serve alcoholic beverages during special events, and would permit employees and guests onsite to consume alcohol purchased from the Commissary.

- **Relief of Required Dedications and/or Improvements** the Project is requesting that the Project be relieved of the following required dedications and improvements through the approval of a Vesting Tentative Tract Map:

  - 3 feet dedication along 8th Street to provide half right of way width of 33 feet and all roadway modification requirements.

  - 8 feet dedication along Lemon Street to provide half right of way width of 33 feet and all roadway modification requirements.

  - 1 foot dedication along Lawrence Street to provide half right of way width of 33 feet and all roadway modification requirements.

- 1 foot dedication along Hunter Street to provide half right of way width of 33 feet and all roadway modification requirements.

- Remove and replace all nonstandard sidewalk along frontage of all lots.

- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). The list below identifies whether any responsible agencies have been identified for the Project.

- No responsible public agencies have been identified for this Project.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a. Would the project have a substantial adverse effect on a scenic vista?

Less than Significant Impact. Panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies. Focal views are also relevant when considering this question from Appendix G of the CEQA Guidelines. Examples of focal views include natural landforms, public art/signs, historic buildings, and important trees.

Valued visual resources in the broader vicinity of the Project Site include the Los Angeles River, the downtown Los Angeles skyline, and structures that are considered historic resources. Closer to the Project Site, intermittent views of the downtown Los Angeles skyline are available from South Alameda Street looking northwest in between buildings and primarily along west-east streets, including 8th Street. Due to distance, the relatively flat topography and intervening development, public views of the Los Angeles River are not available from the Project Site and would not be affected by development within the Project Site.

The 25.84-acre Project Site is currently occupied by the 558,918-square-foot Los Angeles Times Olympic Printing Plant (Plant), a 23,005-square-foot vehicular maintenance building (maintenance building), and six additional ancillary structures, as well as surface parking. The Project Site is surrounded by existing commercial and light industrial uses to the north, west, south, and east.

As described in Section 2, Project Description, of this IS/MND, the Project includes both renovation of certain existing buildings and construction of new buildings. The Project would renovate the existing Plant to provide studio, production support, and office uses, and the existing maintenance building to provide grip and lighting uses. The Project would remove a portion of the existing surface parking to make room for the construction of three sound stage buildings with attached three-story support/office buildings, a two-story shops/office building, three guard booths, and a nine-level above-ground parking structure. Once the Project is completed, views in the vicinity of the Project Site would continue to be available on an intermittent basis along roadway segments, particularly the west-east roadways. In particular, the Project would not block existing public views of the downtown Los Angeles skyline from South Alameda Ave or 8th Street because the existing views are oriented west-east, and the Project Site is an infill location between these west-east streets. Therefore, while the Project would obstruct some partial and distant views of the downtown Los Angeles skyline (primarily views across the Project Site), such blockage would occur on an intermittent basis at single, fixed vantage points, rather than resulting in substantial blockages across long distances, such as along the length of a public roadway. Therefore, the partial reduction in publicly-available intermittent views of the downtown Los Angeles skyline that would result from the Project would not be considered a substantial obstruction of existing views of these visual resources. In addition, as discussed under Checklist Question No. I.b, below, the Project would not block public views of nearby historic resources.

Overall, as the area is already fully developed and highly urbanized, the Project would not have a substantial adverse effect on a publicly available scenic vista. Therefore, impacts related to scenic vistas would be less than significant, and no mitigation measures are required.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Less than Significant Impact. The Project Site is not located along a state scenic highway. The nearest officially eligible state scenic highway is along the Foothill Freeway (I-210), approximately 14 miles northeast of the Project Site, and the nearest City-designated scenic highway is along Stadium Way between the I-5 and I-110 Freeways, approximately 3 miles north of the Project Site. Therefore, the Project would not substantially damage scenic resources within a state or City-designated scenic highway as no scenic highways are located adjacent to the Project Site. In addition, as discussed in detail in response to Checklist Question No. V.b, below, there are historic resources located in the vicinity of the Project Site. These include the Overland Terminal Produce Warehouse (Warehouse) located at 872 S. Alameda Street and the Western Electric Company Historic District (Historic District) located at 800-822 McGarry Street and 1753 E. Olympic Boulevard. The primary public views of the Warehouse are from Olympic Boulevard to the south and Alameda Street to the west, and these views would remain unchanged by the Project, which is located to the north and east. There are no existing important views of or from the Warehouse from any direction that would be blocked by the Project. The primary public views of the Historic District are from Alameda Street, and these views would remain unchanged by the Project. In addition, there are no important views of or from the Historic District from any direction that

would be blocked by the Project. Therefore, impacts related to scenic resources would be less than significant, and no mitigation measures are required.

c. In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact. The Project is located in an urbanized area. As such, this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

With regard to zoning, as discussed in Section 2, Project Description, of this IS/MND, the Project Site is designated by the Central City North Community Plan as Heavy Manufacturing with the corresponding zone of M3-1-RIO (Heavy Industrial Zone, Height District 1, River Implementation Overlay District). The M3 zone permits a wide array of land uses such as storage yards, as well as office and commercial uses. The Height District 1 designation, in conjunction within the M3 Zone, does not impose a maximum building height limitation but does impose a maximum floor area ratio (FAR) of 1.5:1. The "RIO" designation indicates that the Project Site is located within the River Implementation Overlay District (RIO), which is designed to provide for preservation of tributaries and rivers in the City of Los Angeles by promoting river identity, supporting local species, and convenient access, among many other aspects.

As discussed above, the existing Plant would be renovated to provide studio, production support, and office uses, and the existing vehicular maintenance building would be renovated to provide grip and lighting storage. To make room for its new construction, the Project would remove a portion of the existing surface parking to construct three sound stage buildings with attached three-story support/office buildings, a two-story shops/office building, three guard booths, and a nine-level above-ground parking structure. The Project uses would be consistent with the types of uses permitted in the M3 Zone, as described above. The Project proposes to contain a total of 832,190 square feet of floor area; therefore, the proposed FAR of 0.74:1 would be within the limit permitted by the LAMC.

With regard to the City's regulations governing scenic quality, local land use plans applicable to the Project Site also include policies governing scenic quality, including the Citywide General Plan Framework Element (Framework Element), the Central City North Community Plan, the River Implementation Overlay District, and the Citywide Urban Design Guidelines. The Project's lack of conflict with the general intent of these plans is briefly discussed below.

City General Plan Framework Element

The Framework Element provides direction regarding the City's vision for future development in the City and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. One of the key objectives of the Urban Form and Neighborhood Design Chapter is to enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm (Objective 5.5). The Project Site is currently improved with the Plant and a vehicular maintenance building, which have a combined floor area of approximately 581,923 square feet, and with six additional ancillary buildings and structures, as well as with surface parking. The area surrounding the Project Site is highly urbanized and largely industrial, with warehouses, distribution

facilities, shops, and factories in a range of scales and reflecting a wide variety of construction dates. Some mixed-use and commercial properties are also present. Land uses immediately surrounding the Project Site include industrial uses to the north, west and east; industrial and retail uses and Santa Monica Freeway (I-10) to the south; and a restaurant to the southwest. Food warehouses and clothing manufacturing facilities are prominent. The topography of the area is flat.

In accordance with Objective 5.5, the Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development. As described in Section 2, Project Description, of this IS/MND, the Project's design and adaptive reuse of existing structures and construction of a creative studio campus incorporates the industrial history of the site and the context of the nearby Arts District. The Project would preserve and repurpose the Plant and vehicle maintenance building, while positioning the five new buildings and three new guard booths along the perimeter of the site. This design strategy would allow the majority of surface parking and all of the stage loading areas to be central to the site and screened from public view. The new buildings would be oriented along 8th, Alameda and Hunter Streets with glazed street frontages to engage the neighborhood. The three-story support buildings would be clad in dark, standing seam metal facades while the sound stages would consist of long-span, barrel vault roof forms in keeping with the industrial setting of the Arts District. In addition, the new buildings would include limited use of glass and would be surrounded by landscaping 10 feet above grade such that there would be no potential reflectiveness that could affect any cars and pedestrians at the ground level. Furthermore, a graduated color scheme would allow the dark colors along the street to transition to white toward the center of the site. The white colors found at the rear of the new buildings would complement the existing 1980s buildings which are wrapped in white metal panels. In addition, the parking structure would utilize contrasting diagonal shapes printed on perforated metal panels to reduce its scale and relate to the color used in the other buildings on site. Yellow accents in the parking structure and production buildings would define circulation and entry points and aid with wayfinding. To complement the white metal panel system of Buildings 1 and 2, much of the Project's existing concrete masonry unit (CMU) sections would be painted dark gray or carry a large-scale diagonal gray and white striping pattern, similar to the new parking structure. Additionally, the Project would retain 46 street trees and provide 19 new street trees.

Overall, relative to the surrounding development, the Project design would complement the varying design elements of the uses adjacent to the Project Site and would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Urban Form and Neighborhood Design Chapter and, therefore, would not conflict with the Framework Element policies regarding scenic quality.

Central City North Community Plan

As to scenic quality, the Central City North Community Plan includes the following policies applicable to the Project:

- Install utilities underground.
- Require that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses and development.

As part of the Project, new power lines would be placed underground consistent with the coordination opportunities for public agencies section of the Central City North Community Plan. In addition, the

Project would retain the Plant and vehicular maintenance building on-site, and the proposed new buildings would complement the existing industrial uses and surrounding industrial and commercial developments, as detailed above. Overall, relative to the surrounding development, the Project design would complement the varying design elements of the commercial uses adjacent to the Project Site.

Based on the above, the Project would not conflict with the Central City North Community Plan objective and policies related to scenic quality.

River Implementation Overlay District

The Project Site is located within the RIO District and would be required to comply with the Los Angeles River Design Guidelines, which establish best practices for designing development projects located within the RIO District. The Los Angeles River Design Guidelines illustrate options, solutions, and techniques to improve the aesthetic quality of the Los Angeles River and its surrounding communities and access to the Los Angeles River.[7] The Los Angeles River Design Guidelines consist of overarching objectives followed by a list of specific implementation strategies for river-adjacent development. Although the Project is located within the boundaries of the RIO District, the Project Site is located approximately 0.43 mile west of the Los Angeles River and is separated from the Los Angeles River by existing roads, buildings and rail tracks. Nevertheless, the Project would support the relevant Objective 2 of the Los Angeles River Design Guidelines, which calls for employing high quality, attractive and distinguishable architecture and for designing the Project in substantial compliance with the Citywide Design Guidelines, as described below. Therefore, the Project would not conflict with the RIO District.

Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the General Plan Framework Element's urban design principles and are intended to be used by DCP staff, developers, architects, engineers, and community members in evaluating project applications and relevant policies from the Framework Element and Community Plans. The Citywide Design Guidelines were established to carry out common design objectives that maintain neighborhood form and character while promoting design excellence and innovative development solutions. The Citywide Design Guidelines are not intended to supersede the LAMC and/or other regulatory documents such as specific plans and overlays, which may contain design guidelines that better address the specific needs of different geographic areas and communities. As such, in cases where the Citywide Design Guidelines conflict with a provision in a Community Plan's Urban Design chapter, specific plan, overlays, or other local design guidelines, the community-specific requirement will prevail.[8] Additionally, as stated in the Citywide Design Guidelines, although each of the objectives and corresponding guidelines should be considered in a project, not all of them will be appropriate in every case, as each project will require a unique approach, and "flexibility is necessary and encouraged to achieve excellent design."[9]

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7 City of Los Angeles Department of City Planning, Los Angeles River Design Guidelines, July 29, 2015; Urban Design Studio, www.urbandesignla.com/resources/RiverDesignGuidelines.php, accessed August 16, 2021.

8 City of Los Angeles Department of City Planning, Citywide Design Guidelines, adopted by the City Planning Commission on October 24, 2019.

9 City of Los Angeles Department of City Planning, Commercial Citywide Design Guidelines, Pedestrian-Oriented/Commercial and Mixed-Use Projects, May 2011, p. 5.

In October 2019, the City Planning Commission adopted a new set of Citywide Design Guidelines that consolidates the guidelines for three project types into a single document in order to establish a more efficient and effective design review process. The new set includes adopted City policies and up-to-date design solutions that were not previously considered, plus input from various City departments including the Department of Building and Safety, Bureau of Engineering, Cultural Affairs, and the Mayor's Sustainability and Resiliency teams.[10]

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

The Project would improve the pedestrian experience by retaining 46 street trees and planting 19 new street trees. The Project would also provide adequate lighting for security and wayfinding purposes. These Project elements would promote a safe, comfortable, and accessible pedestrian experience for all.

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

The Project would provide separate pedestrian entrances to ensure safe pedestrian access separate from vehicular activity. Vehicular access to the Project's parking would be provided via a two-way driveway main entrance along 8th Street at the northern portion of the Project Site, with a main guard booth and a pedestrian guard booth. In addition, both existing and proposed exit-only gates would be located throughout the Project Site. Two proposed exit-only gates would be located on Hunter Street; one existing exit-only gate would remain as such on Lemon Street; and two existing exit-only gates would remain on Lawrence Avenue and East Olympic Boulevard but would not be utilized for regular vehicular access. In addition, trucks would also have separate entrances and exits. Specifically, a truck guard booth (Guard Booth 7C) and truck entrance would be added within the southeast corner of the Project Site on Lemon Street. Trucks would then exit onto Lemon Street via an existing gate that would be widened as part of the Project. A delivery/loading zone is also proposed on Lawrence Street, in the southwest portion of the Project Site, adjacent to Building 1. The proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate.

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

As a private studio campus with controlled access, guard booths, and a fenced perimeter, the Project would not seek to actively engage with streets and public space or maintain human scale but would nevertheless improve the pedestrian experience by providing identifying signage that would be visible from vehicular and pedestrian traffic. In addition, signage for the display of on-site productions is proposed throughout the Project Site on the exterior of buildings fronting the public right-of-way. All proposed signage would be designed to be aesthetically compatible with the existing and proposed architecture of the Project Site and would comply with all Los Angeles Municipal Code and sign ordinances. The Project would also retain 46 existing street trees and plant 19 new street trees.

[10] City of Los Angeles City Planning Commission, Recommendation Report, Case No. CPC-2019-1098-MSC, October 24, 2019.

Guideline 4: Organize and shape projects to recognize and respect surrounding context

The area surrounding the Project Site is predominantly developed with low- to mid-rise, low-density commercial and industrial uses. The area surrounding the Project Site is highly urbanized and largely industrial, with warehouses, distribution facilities, shops, and factories in a range of scales and reflecting a wide variety of construction dates. Some mixed-use and commercial properties are also present. Land uses immediately surrounding the Project Site include industrial uses to the north, west and east, industrial and retail uses and I-10 to the south; and a restaurant to the southwest. Food warehouses and clothing manufacturing facilities are prominent. The Project is designed to be consistent with the existing development in the Project Site and to be compatible with the general urban characteristics of the surrounding neighborhood. As discussed above, the Project would preserve and repurpose the two main, existing structures while positioning the five new buildings and three new guard booths along the perimeter of the site. This strategy would position the majority of surface parking and all of the stage loading areas in the central areas of the site where they would be screened from public view. The new buildings with their glazed street frontages would be oriented along 8th, Alameda and Hunter Streets to engage the neighborhood.

Guideline 5: Express a clear and coherent architectural idea

The Project would express a clear and coherent architectural idea. The three-story support buildings would be clad in dark, standing seam metal facades, while the sound stages would consist of long-span, barrel vault roof forms in keeping with the industrial heritage of the Arts District. In addition, the new buildings would include limited use of glass and would be surrounded by landscaping 10 feet above grade such that there would be no potential reflectiveness that could affect any cars and pedestrians at the ground level. A graduated color scheme would allow the dark colors along the street to transition to white toward the center of the site. The white colors found at the rear of the new buildings would complement the existing 1980s buildings which are wrapped in white metal panels. In addition, the parking structure would utilize contrasting diagonal shapes printed on perforated metal panels to reduce its scale and relate to the color used in the other buildings on site. Yellow accents in the parking structure and production buildings would define circulation and entry points to further unite the campus and aid with wayfinding. To complement the white metal panel system of Buildings 1 and 2, much of the Project's existing concrete masonry unit (CMU) sections would be painted dark gray or carry a large-scale diagonal gray and white striping pattern, similar to the new parking structure. Overall, the Project design would express a clear and coherent architectural idea.

Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience

As previously discussed, the Project would retain 46 existing street trees and plant 19 new street trees. The Project would also provide a comfortable user experience by providing a 15,500-square-foot health/fitness center with lounge/seating areas, 16,500-square-foot commissary, and 1,700 square-foot mezzanine-level café within Building 1 plus 5,500 square-feet of adjacent outdoor dining space. In addition, the Project would include low-level exterior lights adjacent to the buildings and along pathways that would serve to enhance the aesthetics of the site and the safety of pedestrians.

Guideline 7: Carefully arrange design elements and uses to protect site users

The Project would create a studio campus consisting of a main studio production/support building, three sound stage/support buildings, a shops/support building, a nine-level parking structure, three guard booths, and a grip/lighting storage building. Amenities such as dining services and a health/fitness center would be provided within the main building, which would reduce the need for users to travel off-site. The Project would also include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify and secure routes between parking areas and points of entry into the commercial buildings.

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

The Project Site is located in an urbanized area. Landscaping within the Project Site includes ornamental landscaping and hardscaping features. As discussed in the Tree Inventory Report prepared for the Project, included in Appendix IS-2 of this IS/MND, 122 trees are currently located on-site, including Canary Island date palms, Indian laurels, Mexican fan palms, river red gums, carrotwoods, edible figs, and a weeping fig, and there are 51 street trees adjacent to the Project Site.[11] Of the 122 existing trees located on-site, 28 would be relocated, 69 would be removed, and 25 trees would remain in place. The Project would plant 164 new on-site trees in accordance with requirements of the City of Los Angeles Landscape Ordinance 170,978. As such, at buildout, a total of 217 trees would be located on-site. Of the 51 existing street trees, five trees would be removed and 46 street trees would be retained. The Project would plant 19 new street trees. Existing street trees to remain in the City right of way would be maintained and protected during construction of the Project, utilizing standard tree protection practices and measures.[12] All new trees would be planted in accordance with the City's requirements. As such, at buildout, a total of 65 trees would be located in the public right-of-way. Thus, the Project would protect the Project Site's natural resources and features.

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

As discussed in Section 2, Project Description, of this IS/MND, the Project would be designed and constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code. The Project's design is based on principles of smart growth and environmental sustainability. The sustainability features that would be incorporated into the Project include, but are not limited to, the following: a 500 kW photovoltaic system on the northeast corner of Building 1; electric vehicle charging stations; material recycling stations; efficient HVAC systems; energy-efficient wall insulation and glazing units; high efficiency dual-flush toilets with a flush volume of 1.28/1.1 gallons per flush, or less, high efficiency hybrid urinals, showerheads with a flow rate of 1.5 gallons per minute or less, and drip irrigation systems to promote reductions in indoor and outdoor water usage; Energy Star–labeled appliances; and water-efficient landscape design (i.e., grouping plants according to their water needs, use of native and low-water plants, etc.). In addition, the Project would

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11 Carlberg Associates, 8th & Alameda Project—2000 East 8th Street, Los Angeles, California—Tree Inventory Report, April 23, 2021. See Appendix IS-2 of this IS/MND.

12 If it is subsequently determined that it is not feasible to maintain these trees (e.g., due to changes in project design or access), removal of those trees would be required to comply with the City's street tree removal procedures, and replacement trees would be required to be provided in conformance with the City's current guidelines and policies.

provide domestic water heating systems located in close proximity to point(s) of use and individual metering and billing for water use.

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

The Project would be required to comply with the City's Low Impact Development (LID) ordinance and to implement standard erosion controls to limit stormwater runoff. As part of these requirements, the Project would manage stormwater through a series of drywells connected to an on-site stormwater drain system that flows off-site via a stormwater main. As discussed in the Hydrology Report and included as Appendix IS-9 of this IS/MND, the Project Site currently drains to a network of on-site catch basins that convey stormwater runoff into the existing City of LA-maintained underground 12-foot arched concrete storm drain channel, which intersects the Project Site from the northwest to the east through Lemon Street. The on-site storm drain network captures flow from the entire Project Site including the existing roof drainage of both the Plant and vehicular maintenance building, and sheet flow from the surface parking lot. The existing underground 12-foot arched storm drain main conveys all flow from the Project Site as well as flow from two catch basins at the intersection of Lawrence Street and Olympic Boulevard and several catch basins along 8th Street and the intersection of Lawrence and 8th. Generally, the proposed on-site grading would maintain the existing drainage pattern with slight grade changes. The on-site 12-foot arched storm drain main, and any existing laterals on-site, would be protected in place. The redeveloped Project Site would convey surface and roof drainage to several proposed drywells located throughout the Project Site, overflowing to the on-site storm system that conveys flow into the 12-foot arched storm drain main.

In summary, for all the foregoing reasons, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, impacts related to scenic quality would be less than significant, and no mitigation measures are required.

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. New light sources introduced by a project may increase ambient nighttime illumination levels. Additionally, nighttime spillover of light onto adjacent properties has the potential to interfere with certain functions, including vision, sleep, privacy, and general enjoyment of the natural nighttime condition. The significance of the impact depends on the type of use affected, proximity to the affected use, the intensity of the light source, and the existing ambient light environment. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and institutional uses, and natural areas.

Construction

While the majority of Project construction would occur during daylight hours, there is a potential that construction could occur in the evening hours and require the use of artificial lighting, particularly during the winter season when daylight is no longer sufficient earlier in the day. Outdoor lighting sources, such as floodlights, spot lights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in

compliance with LAMC light intensity requirements.[13] Additionally, as part of the Project, construction lighting would be shielded to minimize light spillover. Construction lighting, while potentially bright, would be focused on the particular area undergoing work.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities. In addition, large, flat surfaces that generate substantial glare are typically not an element of construction activities. Furthermore, temporary construction fencing comprised of a solid material or including screening would be placed along the periphery of the Project Site to screen construction activity from view at the street level from off-site locations. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

Based on the above, light and glare associated with Project construction activities would not substantially alter the character of off-site areas surrounding the Project Site or adversely impact day or nighttime views in the area. Therefore, impacts related to light and glare during construction would be less than significant, and no mitigation measures are required.

Operation

The Project Site currently generates moderate levels of light from interior light spillage from buildings, security lighting, pole lighting from surface parking areas, and vehicle headlights from surface parking areas. Existing glare sources within the Project Site include glass, architectural elements, and vehicle headlights. The Project Site is located in an urbanized area and is surrounded by urban infrastructure, street lighting, and low-, mid-, and high-rise buildings with their own sources of daytime and nighttime light and glare.

The Project would introduce new sources of light and glare that are typically associated with commercial buildings, including architecture, interior, security and wayfinding lighting sources. However, all Project lighting would comply with current energy standards and codes while providing efficient and effective on-site lighting for the operation of a film and television studio. Low-level exterior lights would be provided to accent signage, on-site production display signage, architectural features, and landscaping elements. In addition, low-level exterior lights would be located adjacent to the proposed buildings, along pathways and the Project Site perimeter for aesthetic, security, and wayfinding purposes. Light sources would be shielded and/or directed toward the Project Site to minimize light spill to neighboring buildings and surrounding areas, and to reduce sky-glow and glare in order to improve nighttime visibility. In addition, the Project would comply with City conditions for new or relocated streetlights.

Proposed signage would include mounted Project identity signage, general ground-level and wayfinding pedestrian and vehicular signage, and security markings in compliance with code requirements. Project

[13] LAMC Chapter 9, Article 3, Section 93.0117 provides that, no exterior light source may cause more than 2 foot-candles (21.5 lx) of light intensity or generate direct glare onto exterior glazed windows or glass doors; elevated porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any property containing a residential unit or units.

identity signage would be visible from off-site vehicular and pedestrian traffic and serve as identifiers for the Project. Wayfinding signs would be located at the parking garage entrances and exits, at building lobbies, on the interior-facing faces of stages, and on the ground level throughout the Project Site, and would be integrated into the overall design of the campus. In addition, signage for the display of on-site productions would be proposed throughout the Project Site on the exterior of buildings fronting the public right-of-way. All proposed signage would be designed to be aesthetically compatible with the existing and proposed architecture of the Project Site and would comply with all LAMC and sign ordinances.

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. In general, sun reflection that has the greatest potential to interfere with driving occurs from the lower stories of a structure. Similar to the existing development at the Project Site, sun reflection from the Project would occur during periods in which the sun is low on the horizon and when the point of reflection within the Project Site is in front of the driver, in the direction of travel. The Project would feature a variety of surface materials, including glass, concrete, and metal. As part of the Project, glass used in building façades would have high-performance coatings that would not be highly reflective, thereby minimizing glare from reflected sunlight. In addition, 10-foot high landscaping surrounding the Project Site would limit potential off-site glare along adjacent roadways.

Excessive nighttime glare would not result from illuminated signs or vehicle headlights. As described above, Project illuminated signs would not exceed the prescribed lighting requirements of the LAMC. Furthermore, while headlights from vehicles entering and exiting from the surface parking would be visible during the evening and nighttime hours, such lighting sources would be typical for the area. In addition, landscaping that would be 10 feet above grade would surround the Project Site and eliminate the potential reflectiveness that could affect any cars and pedestrians off-site at the ground level. The parking structure would be designed so that headlights from vehicles within the structure would not spillover and result in glare. Thus, nighttime glare would not result in a substantial adverse impact.

Based on the above, with adherence to regulatory requirements, lighting associated with Project operation would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

Therefore, impacts related to aesthetics would be less than significant, and no mitigation measures are required.

II. AGRICULTURE AND FOREST 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.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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

No Impact. The Project Site is located in an urbanized area of the City. As discussed in Section 2, Project Description, of this IS/MND, the Project Site is currently developed with a Los Angeles Times printing plant, vehicular maintenance building, ancillary buildings, and surface parking. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. Furthermore, the Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.[14,15] Therefore, the Project would not create impacts related to farmland, and no mitigation measures would be required.

[14] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166-023-010, 5166-023-016, 5166-027-014, and 5166-028-004, http://zimas.lacity.org/, accessed March 11, 2021.

[15] California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/dlrp/ciff/, accessed June 15, 2021.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is zoned as M3-1-RIO (Heavy Industrial Zone, Height District 1, River Implementation Overlay Plan). As such, the Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.[16] Therefore, the Project would not create impacts with regard to a conflict with existing zoning for agricultural uses or a Williamson Act contract, and no mitigation measures would be required.

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

No Impact. As previously discussed, the Project Site is located in an urbanized area and is currently developed with a Los Angeles Times printing plant, vehicular maintenance building, ancillary buildings, and surface parking. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for industrial uses and is not zoned and/or used as forest land.[17] Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources and Government Codes. Therefore, the Project would not create impacts to forest land or timberland, and no mitigation measures would be required.

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As discussed above, the Project Site is located in an urbanized area of the City and does not include farmland or forest land. The Project Site and surrounding area are also not mapped as farmland or forest land, are not zoned for farmland/agricultural use or forest land, and do not contain any agricultural or forest uses. Therefore, the Project would not create impacts with regard to the loss of forest land or in the conversion of forest land to non-forest use, and no mitigation measures would be required.

e. Would the project 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. As described above, the Project Site is located within an urbanized area and does not include farmland or forest land. The Project Site and surrounding area are not mapped as farmland, are not zoned for farmland or agricultural use, and do not contain any agricultural uses. Therefore, the

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16 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166-023-010, 5166-023-016, 5166-027-014, and 5166-028-004, http://zimas.lacity.org/, accessed March 11, 2021.

17 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166-023-010, 5166-023-016, 5166-027-014, and 5166-028-004, http://zimas.lacity.org/, accessed March 11, 2021.

Project would not create impacts with regard to conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use, and no mitigation measures would be required.

III. AIR QUALITY

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. 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?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The Project Site is located within the 6,745-square-mile South Coast Air Basin (Basin), which includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. The South Coast Air Quality Management District (SCAQMD) is the air pollution control agency for the Basin and is required, pursuant to the federal Clean Air Act,[18] to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone [O_3], particulate matter [PM_{10}], and fine particular matter [$PM_{2.5}$]). SCAQMD's 2016 Air Quality Management Plan (2016 AQMP) is the regional blueprint for achieving air quality standards and includes integrated strategies and measures needed to meet the National Ambient Air Quality Standards (NAAQS), particularly for the one-hour and eight-hour Ozone and the latest particulate matter standards.[19] These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG).

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[18] United States Environmental Protection Agency, Summary of the Clean Air Act, www.epa.gov/laws-regulations/summary-clean-air-act, accessed August 9, 2021.

[19] SCAQMD, Final 2016 AQMP, approved on March 3, 2017, www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15.

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment.[20] With regard to future growth, SCAG has prepared the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, referred to as Connect SoCal (2020–2045 RTP/SCS) which provides population, housing, and employment projections for cities under its jurisdiction.[21] The growth projections in the 2020–2045 RTP/SCS are based in part on projections originating under County and City General Plans. Because the 2020–2045 RTP/SCS was just recently adopted in September of 2020, its growth projections were not used in the preparation of the air quality forecasts and consistency analysis included in the 2016 AQMP.[22] Instead, the growth projections of SCAG's prior RTP/SCS, its 2016-2040 RTP/SCS, were utilized in the preparation of the air quality forecasts and consistency analysis included in the 2016 AQMP.[23]

The 2016 AQMP relies on emissions forecasts made based on demographic and economic growth projections provided by SCAG's 2016–2040 RTP/SCS. SCAG is charged by California law to prepare and approve "the portions of each AQMP relating to demographic projections and integrated regional land use, housing, employment, and transportation programs, measures and strategies." Projects whose growth is included in the projections used in the formulation of the AQMP are considered to be consistent with that plan and not to interfere with its attainment.[24] The SCAQMD recommends that, when determining whether a project is consistent with the current AQMP, a lead agency assess whether the project would directly obstruct implementation of the plan and whether it is consistent with the demographic and economic assumptions (typically land use related, such as resultant employment or residential units) upon which the plan is based.

As previously described, the Project would renovate the Plant and the existing vehicular maintenance building to provide studio, production support, and office uses as well as grip and lighting storage. In addition, the Project would remove three ancillary structures and replace a portion of the existing surface parking in order to build three sound stage buildings, support/office uses, a two-story shops/office building, three guard booths, and an above-ground parking structure. Upon completion of the renovation and new construction, the Project would provide a total of 832,190 square feet of floor area.

The Project would be consistent with the vehicle miles travelled (VMT) reduction policies included in SCAG's 2016–2040 RTP/SCS. Specifically, consistent with the 2016–2040 RTP/SCS alignment of transportation, land use, and housing strategies, the Project would provide employees and visitors with convenient access to public transit, which would facilitate a reduction in VMT. As shown in Appendix IS-11 of this IS/MND, the Project's internal capture and transportation demand management (TDM) plan would reduce the number of vehicular trips and related VMT by approximately 24 percent. The Project's estimated VMT reductions would be consistent with regional strategies and would be consistent with and support the goals and benefits of the SCAG RTP/SCS, which seeks improved "mobility and access by

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20 SCAG serves as the federally designated metropolitan planning organization (MPO) for the southern California region.

21 SCAG, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.

22 SCAG, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.

23 SCAQMD, Final 2016 AQMP, 2017, p. 3-17.

24 SCAQMD, CEQA Air Quality Handbook, p. 12-1.

placing destinations closer together and decreasing the time and cost of traveling between them. Thus, consistent with 2016–2040 RTP/SCS, the Project would reduce VMT, and, consequently, the Project's mobile source emissions would be reduced.

As discussed in Response to Checklist Question XIV.a, Population and Housing, below, the Project is consistent with the regional growth projections for the Los Angeles Subregion. As noted above in the Project Description, the Project would not introduce new homes at the Project Site and would therefore not result in direct population growth in the area. Based on employee generation rates promulgated by the City of Los Angeles VMT Calculator Documentation and also provided in the Project's Transportation Assessment, the Project would generate approximately 2,094 employees.[25] According to SCAG's 2016–2040 RTP/SCS, there are approximately 1,848,339 employees within the City of Los Angeles in 2021 and approximately 1,932,750 employees are projected within the City for 2026, the Project's buildout year, which would be an increase of 84,411 employees. As such, the Project's estimated 2,094 employees would represent 0.11 percent of the total number of employees in 2026 and 2.48 percent of the growth between 2021 and 2026 within the City of Los Angeles.[26] While some of the new employment positions could be filled by persons who would relocate to the vicinity of the Project Site, this potential increase in population would not be substantial since not all employees would move close to the Project Site. Specifically, some employment opportunities may be filled by persons already residing in the vicinity of the Project Site and other persons would commute to the Project Site from other communities in and outside of the City. Therefore, the increase in employees would be well within the existing employment projections for the community and region. Because the Project would result in a minimal increase in permanent employment, it would be consistent with the demographic projections set forth in SCAG's 2016–2040 RTP/SCS that were used in the 2016 AQMP. Thus, the Project would not conflict with or obstruct implementation of the 2016 AQMP.

In addition, the Project would not conflict with or obstruct implementation of the City's General Plan Air Quality Element.[27] The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. To achieve the goals of the Air Quality Element, performance-based standards have been adopted by the City of Los Angeles to provide flexibility in implementation of its policies and objectives. The goal, objectives, and policies provided in the City's Air Quality Element applicable to the Project include the following:

- **Goal 1:** Good air quality and mobility in an environment of continued population growth and healthy economic structure.
- **Objective 1.1:** It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.

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25 Gibson Transportation Consulting, Transportation Assessment for the 8th and Alameda Project, August 2021. See Appendix IS-11.1 of this IS/MND.

26 Based on a linear interpolation of employee data from SCAG's 2016–2040 RTP/SCS, Demographics & Growth Forecast Appendix, Table 11.

27 Department of City Planning Los Angeles, General Plan Air Quality Element, November 1992, https://planning.lacity.org/odocument/0ff9a9b0-0adf-49b4-8e07-0c16feea70bc/Air_Quality_Element.pdf.

- **Objective 1.3:** It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.

- **Policy 1.3.2:** Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.

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

The Project's location within an existing developed urban area would reduce VMT and related vehicle emissions in comparison to a project located in a non-urban environment as discussed further in Checklist Question No. XVII, Transportation, and Appendix IS-11.1, Transportation Assessment, of this IS/MND. The Project Site is also located near the Arts District, with its growth in mixed-use residential and commercial development. High population density would result in employees and visitors potentially living closer to the Project Site, reducing travel distances and overall VMT. In addition, the Project includes short- and long-term bicycle parking spaces (i.e., 58 bicycle parking spaces consisting of 25 short-term and 33 long-term spaces), shower/changing facilities, pedestrian-friendly features (e.g., a separate pedestrian entrance at the main gate connecting to internal walkways throughout the Project Site), and on-site EV and EV-ready parking, and the Project Site provides convenient access to public transit, all of which encourages multi-modal transportation and facilitates a reduced use of vehicular use and a reduction in VMT as discussed in Section XVII and the Transportation Assessment.

As shown in Table 3 and Table 4 on pages 60 and 61, Project implementation would not exceed the SCAQMD localized significance thresholds which were developed to ensure no exceedances of the California or federal ambient air quality standards or thresholds. As the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for air quality pollutants (including VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$), the Project also would not delay timely attainment of air quality standards or interim emission reductions specified in the 2016 AQMP. In addition, the Project would be consistent with the population and employment growth projections in the AQMP.

Based on the above, the Project would not conflict with or obstruct implementation of the SCAQMD's AQMP or the City's General Plan Air Quality Element. Impacts would be less than significant, and no mitigation measures are required.

Table 3
Project-Related Regional and Localized Unmitigated Construction Emissions[a]
(pounds per day)

Emission Type	VOC[b]	NO_X	CO	SO_X	PM_{10}[c]	$PM_{2.5}$[c]
Regional Emissions						
2023	10	98	87	<1	15	7
2024	25	90	86	<1	15	5
2025	25	67	72	<1	15	5
2026	21	20	40	<1	10	3
Maximum Regional Emissions	**25**	**98**	**87**	**<1**	**15**	**7**
SCAQMD Regional Construction Daily Significance Threshold	75	100	550	150	150	55
Over/(Under)	(50)	(2)	(463)	(150)	(135)	(48)
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
2023		67	65		9	6
2024		53	65		2	2
2025		28	37		1	1
2026		14	37		1	1
Maximum Localized Emissions		**67**	**65**		**9**	**6**
SCAQMD Localized Significance Threshold[d]	—	165	4,547		107	36
Over/(Under)	—	(98)	(4,482)		(98)	(30)
Exceed Threshold?	**—**	**No**	**No**	**—**	**No**	**No**

[a] *Compiled using the CalEEMod emissions model. The equipment mix and use assumptions for each phase are provided in Appendix IS-1 of this IS/MND. CalEEMod modeling outputs are provided in Appendix IS-1 of this IS/MND. Numbers may not add up exactly due to rounding.*

[b] *CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEmod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.*

[c] *PM_{10} and $PM_{2.5}$ emission estimates assume compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.*

[d] *The SCAQMD LSTs are based on Source Receptor Area No. 1 (Downtown Los Angeles) for a 5-acre site with a conservative 200-meter receptor distance. Please refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.*

Source: Eyestone Environmental, 2021.

Table 4
Project-Related Regional and Localized Unmitigated Operational Emissions—Net Increase[a]
(pounds per day)

Emission Type/Source	VOC[b]	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Regional Emissions						
Area	6	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Mobile	<1	4	10	<1	4	1
Stationary (Emergency Generator)	<1	2	2	<1	<1	<1
Project Regional Emissions	**7**	**6**	**12**	**<1**	**4**	**1**
SCAQMD Regional Significance Threshold	55	55	550	150	150	55
Over/(Under)	(48)	(49)	(538)	(150)	(146)	(54)
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
Project Localized Emissions[c]		**2**	**2**		**<1**	**<1**
Localized Significance Threshold[d]	—	165	4,547	—	26	9
Over/(Under)	—	(163)	(4,545)		(26)	(9)
Exceed Threshold?	**—**	**No**	**No**	**—**	**No**	**No**

Note: Numbers may not add up exactly due to rounding

[a] *Worksheets and modeling output files are provided in Appendix IS-1 of this IS/MND.* The table reflects Project emissions (i.e., Buildout emissions less existing emissions for the Buildout year (2026)).

[b] *CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEmod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.*

[c] *Localized emissions include area, energy and stationary sources.*

[de] *The SCAQMD LSTs are based on Source Receptor Area No. 1 (Central Los Angeles) for a 5-acre site with a conservative 200-meter receptor distance. Please refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.*

Source: Eyestone Environmental, 2021.

b. Would the project 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?

Less Than Significant Impact. As indicated above, the Project Site is located within the Basin, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the Basin, including the monitoring stations closest to the Project Site, which exceed the most stringent ambient air quality standard for ozone and particulate matter. The closest monitoring station is the North Main Street Station, located at 1630 North Main Street in the City of Los Angeles, approximately 2.5 miles north of the Project Site. The Project would contribute to local and regional air pollutant emissions during construction (short-term) and Project occupancy (long-term). However, as demonstrated by the following analysis, construction and operation of the Project would result in less than

significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established within the SCAQMD CEQA Air Quality Handbook.[28]

Construction

Construction of the Project would have the potential to create regional air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities),[29] In addition, fugitive dust emissions would result from site preparation, grading and construction activities. Mobile source emissions, primarily particulate matter and nitrogen oxides (NO_X) would result from the use of off-road construction equipment such as loaders, graders, backhoes, haul and materials trucks and employee vehicles. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release volatile organic compounds (VOCs). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 75 pounds a day for VOCs; (2) 100 pounds per day for NO_X; (3) 550 pounds per day for carbon monoxide (CO); (4) 150 pounds per day for sulfur oxides (SO_X); (5) 150 pounds per day for PM_{10}; and (6) 55 pounds per day for $PM_{2.5}$.[30]

Construction activities would include site preparation, grading, paving, building construction, and architectural coatings. Construction would occur over approximately 34-month period (e.g., mid-2023 to mid-2026). Construction would require approximately 4,250 cy of total soil export. Additional details are provided in Appendix IS-1 of this IS/MND.

Regional Impacts

Regional construction-related emissions were calculated using the SCAQMD-recommended California Emissions Estimator Model (CalEEMod) Version 2016.3.2. Model results are provided in Appendix IS-1 of this IS/MND. The analysis assumes that all construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust and compliance with Rule 1113 requiring use of low VOC paints. A summary of unmitigated maximum daily regional emissions for Project construction is presented in Table 3 on page 60 along with the regional significance thresholds for each air pollutant.

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28 SCAQMD, Air Quality Analysis Guidance Handbook, www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook, accessed April 20, 2021..

29 Construction assumptions are contained in Appendix IS-1 of this IS/MND, Construction Schedule and Equipment Requirements, and were obtained from DPR Construction. Construction emissions conservatively do not account for the offsetting emissions from decommissioning of existing operational uses during construction. All construction emissions are considered new emissions.

30 SCAQMD, Air Quality Analysis Guidance Handbook, www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook, accessed April 20, 2021.

As shown in Table 3 on page 60, maximum unmitigated regional construction emissions would not exceed the SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Thus, the Project's potential impacts associated with regional construction emissions would be less than significant, and no mitigation measures are required.

Localized Impacts

The localized effects from on-site daily emissions were evaluated at sensitive receptor locations that could potentially be impacted by the Project according to SCAQMD's localized significance thresholds (LST) methodology, which uses on-site mass emissions rate lookup tables and Project-specific modeling, where appropriate.[31] SCAQMD provides LSTs applicable to the following criteria pollutants: NO_X, CO, PM_{10}, or $PM_{2.5}$. SCAQMD does not provide an LST for SO_2 as it is not considered a pollutant of concern from construction and operational activities of land use development projects.[32] Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in O_3 formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.[33]

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor.[34] The mass rate look-up tables were developed for each source receptor area and can be used to determine whether or not a project may generate significant adverse localized air quality impacts.[35] SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to 5 acres.[36] For projects that exceed 5 acres, such as the Project, the 5-acre LST look-up values can be used as a screening tool to determine which pollutants require detailed analysis.[37] This approach is conservative as it assumes that all on-site emissions would occur within a 5-acre area and would over-predict potential localized impacts (i.e., more pollutant emissions occurring within a smaller area, resulting in greater concentrations).[38]

Estimates of maximum construction-related localized (on-site) daily emissions for NO_X, CO, PM_{10}, or $PM_{2.5}$ are presented in Table 3. Based on the construction site acreage and distance to the closest off-site sensitive receptors, localized construction emissions thresholds were obtained from the LST look-up tables and are also listed in Table 3. With respect to air quality, there are no sensitive receptors in the immediate vicinity of the Project Site. However, there are two related projects with residential uses

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

32 SCAQMD, Final LST Methodology, July 2008.

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

34 SCAQMD, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008, www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2.

35 SCAQMD, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008, www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2.

36 SCAQMD, Appendix C—Mass Rate LST Look-up Tables, www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2.

37 Telephone Conversation, Ian MacMillan, SCAQMD CEQA Program Supervisor, November 10, 2011.

38 Telephone Conversation, Ian MacMillan, SCAQMD CEQA Program Supervisor, November 10, 2011.

located at 1000 and 1002 South Mateo Street approximately 250 meters northeast of the Project Site. These two related projects could potentially be operational during proposed construction activities and, therefore, were considered hypothetically as sensitive receptors. As a conservative assumption, a 200-meter receptor distance was used to evaluate impacts at these receptors.[39] As presented in Table 3 on page 60, construction-related daily maximum localized emissions would not exceed the SCAQMD daily significance thresholds for NO_X, CO, PM_{10}, or $PM_{2.5}$. Therefore, localized construction emissions resulting from the Project would result in less than significant short-term impacts, and no mitigation measures are required.

Operation

To determine if a significant air quality impact would occur, the net increase in regional operational emissions generated by the Project was compared against SCAQMD's significance thresholds.[40] SCAQMD has established separate significance thresholds to evaluate potential impacts due to the incremental increase in criteria air pollutants associated with long-term operations. Regional operational emissions for the Project were calculated using CalEEMod. Inputs into the CalEEMod model include Project-related vehicle trips, as well as land uses and square footage to determine energy and water usage and waste generation. Mobile-source emissions were calculated within CalEEMod based on data from the VMT analysis included in the Transportation Assessment, Appendix IS-11.1 of this IS/MND. The VMT analysis is based on the LADOT VMT Calculator methodology and contains trip generation and daily VMT for the Project. In addition, the proposed land uses would result in an increase in emissions generated by energy sources (e.g., natural gas combustion) and area sources (e.g., landscape fuel combustion, consumer products, and architectural coatings.

Regional Impacts

Operational air quality impacts are assessed based on the Project's incremental increase in emissions. Therefore, calculation of the Project's operational emissions are the difference in emissions from Buildout land uses and Existing land uses for the Buildout year (2026). The results of the modeled emissions calculations are provided in Table 4 on page 61 and CalEEMod model output files are provided in Appendix IS-1 of this IS/MND. As indicated therein, the Project would result in an increase in criteria pollutant (VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$.) emissions which would fall below the SCAQMD daily significance thresholds for long-term regional emissions. Therefore, the Project's potential impacts associated with regional operational emissions would be less than significant, and no mitigation measures are required.

Localized Impacts

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. Localized emissions estimates for criteria air pollutants from the Project's on-site sources are presented in Table 4. The SCAQMD LST mass rate look-up tables were used to evaluate potential localized impacts.

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[39] SCAQMD LST thresholds are given at 25, 50, 100, 200 and 500-meter increments.

[40] SCAQMD, SCAQMD Air Quality Significance Thresholds, revised March 2015. SCAQMD based these thresholds, in part, on the federal Clean Air Act and, to enable defining "significant" for CEQA purposes, defined the setting as the South Coast Air Basin. (See SCAQMD, *CEQA Air Quality Handbook*, April 1993, pp. 6-1–6-2.)

As shown in Table 4 on page 61, on-site localized operational emissions would not exceed any of the LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$.

With regard to off-site localized impacts, land use development projects may increase traffic in the nearby vicinity resulting in an increase in mobile source emissions. The primary pollutant of concern with regard Project related off-site mobile emissions is CO. It has long been recognized that CO exceedances are caused by vehicular emissions,[41] primarily when idling at intersections.[42,43] Accordingly, vehicle emissions standards have become increasingly more stringent. Before the first vehicle emission regulations, cars in the 1950s were typically emitting about 87 grams of CO per mile.[44] Currently, the CO standard in California is a maximum of 3.4 grams/mile for passenger cars (with provisions for certain cars to emit even less).[45] With the turnover of older vehicles, introduction of cleaner fuels and implementation of control technology on industrial facilities, CO concentrations in the Air Basin have steadily declined.

The analysis prepared for CO attainment in the Basin by the SCAQMD was used to assist in evaluating the potential for the Project to create CO exceedances in the Air Basin. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 Air Quality Management Plan (2003 AQMP) and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan).[46,47] As discussed in the 1992 CO Plan, peak carbon monoxide concentrations in the Air Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of the 1992 CO Plan and subsequent plan updates and air quality management plans.

In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which had a daily traffic volume of approximately 100,000 vehicles per day. As part of the 2003 AQMP CO Modeling Attainment Demonstration, an updated analysis was performed based on the 1992 CO Plan using more recent modeling techniques (dispersion modeling, emission factors).[48] The 2003 AQMP CO Modeling and Attainment Demonstration estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until

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41 USEPA, 2000, Air Quality Criteria for Carbon Monoxide, EPA 600/P-099/001F.

42 SCAQMD, CEQA Air Quality Handbook, 1993, Section 4.5.

43 SCAQMD, Air Quality Management Plan, 2003.

44 USEPA, Timeline of Major Accomplishments in Transportation, Air Pollution, and Climate Change, www.epa.gov/air-pollution-transportation/timeline-major-accomplishments-transportation-air-pollution-and-climate, accessed September 21, 2020.

45 CARB, California Exhaust Emission Standards and Test Procedures for 2001 and Subsequent Model Passenger Cars, Light-duty Trucks, and Medium-duty Vehicles, amended September 27, 2010.

46 SCAQMD, Air Quality Management Plan, Appendix V, Modeling and Attainment Demonstrations, August 2003.

47 SCAQMD, Federal Attainment Plan for Carbon Monoxide, 1992.

48 SCAQMD, Air Quality Management Plan, Appendix V, Modeling and Attainment Demonstrations, August 2003.

the daily traffic at the intersection exceeded more than 400,000 vehicles per day. As an initial screening step, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis.

At buildout of the Project, the highest average daily trips at an intersection in the vicinity of the Project Site would be approximately 48,000 trips at the Alameda Street and Olympic Boulevard intersection,[49] which is significantly below the daily traffic volumes that would be expected to generate CO exceedances as evaluated in the 2003 AQMP.[50] This daily trip estimate is based on the peak hour conditions of the intersection and includes both Project and background vehicle trips. There is no reason unique to the Basin meteorology to conclude that the CO concentrations at this intersection would exceed the 1-hour CO standard if modeled in detail, based on the studies undertaken for the 2003 AQMP.[51] Therefore, the Project does not trigger the need for a detailed CO hotspots analysis and would not cause any new or exacerbate any existing CO hotspots. As a result, the Project's potential impacts related to localized mobile-source CO emissions are considered less than significant. The supporting data for this analysis is included in Appendix IS-1 of this IS/MND.

Based on the above, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard. Impacts would be less than significant, and no mitigation measures are required.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes or others who engage in frequent exercise. As defined in the SCAQMD CEQA Air Quality Handbook, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities; (2) rehabilitation centers; (3) convalescent centers; (4) retirement homes; (5) residences; (6) schools (i.e., elementary, middle school, high schools); (7) parks and playgrounds; (8) child care centers; and (9) athletic fields. As discussed above, the nearest sensitive receptor with respect to air quality is the Westland School located approximately 130 feet west of the Project Site. Residential uses are located further away, approximately 800 feet from the Project Site.

As discussed above, construction and operation of the Project would result in less than significant impacts relative to both regional and localized air pollution emissions. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations. In addition, Project construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust and other specified dust

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[49] Gibson Transportation Consulting, Transportation Assessment for the 8th and Alameda Studio Project, City of Los Angeles, August 2021.

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

[51] It should be noted that CO background concentrations within the vicinity of the modeled intersection have substantially decreased since preparation of the 2003 AQMP. In 2003, the 1-hour background CO concentration was 5 ppm and has decreased to 2 ppm in 2014.

control measures. As such, impacts to off-site sensitive receptors would be less than significant, and no mitigation measures are required.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit toxic air contaminants (TACs). The California Air Resources Board (CARB) has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective (2005), which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).[52] SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (2005).[53] Together the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses. The Project would not include any substantial sources of TAC emissions such as generators, boilers or any other combustion sources. Cooking equipment (char broilers) may be installed as part of the Project. However, the CARB Air Quality and Land Use Handbook does not identify char broilers as a substantial source of TAC emissions. In addition, if the Project were to install stationary equipment with the potential to emit TACs, this equipment would be subject to SCAQMD permitting requirements which will identify health risk to nearby sensitive receptors. As the Project would not contain substantial sources of TAC emissions and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

The SCAQMD recommends Health Risk Assessments (HRAs) for substantial sources of diesel particulate matter such as warehouse distribution and cold storage facilities. No such facilities are located on the Project Site, and the Project does not propose any such uses. As such, a HRA was not required for the Project.

Based on the above, the Project would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant, and no mitigation measures are required.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. No other emissions, including objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people.

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[52] California Air Resources Board, Air Quality and Land Use Handbook: A Community Health Perspective, April 2005, ww3.arb.ca.gov/ch/handbook.pdf.

[53] SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 2005, www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf.

With respect to Project operation, according to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.[54] The Project would not involve these types of uses as the Project would include the development of classroom and ancillary uses. On-site trash receptacles would also be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.[55] In particular, Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.[56]

Based on the above, the Project would not result in other emissions affecting a substantial number of people. The Project's potential impacts would be less than significant, and no mitigation measures are required.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒

[54] SCAQMD, CEQA Air Quality Handbook, April 1993, www.dtsc-ssfl.com/files/lib_ceqa/ref_draft_peir/Chap4_2-AirQuality/SCAQMD_1993_-_CEQA_Handbook.pdf.

[55] SCAQMD, Visible Emissions, Public Nuisance, & Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed April 20, 2021.

[56] SCAQMD, Rule 402, Nuisance, www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf, accessed February 3, 2020.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

a. Would the project 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 Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact with Mitigation Incorporated. The Project Site is located in an urbanized area and is currently developed with a Los Angeles Times printing plant, vehicular maintenance building, ancillary buildings, and surface parking. Existing landscaping within the Project Site includes 122 on-site trees and 51 street trees. Due to the urbanized and disturbed nature of the Project Site and the areas surrounding the Project Site, and the lack of large expanses of open space areas in the Project Site and surrounding areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. Based on the lack of habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife (CDFW)[57] or by the U.S. Fish and Wildlife Service (USFWS)[58] would be present on-site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City.[59] Additionally, as detailed above in Checklist Question No. I.c., although the Project is located within the boundaries of the RIO District, the Project Site is located approximately 0.43 mile west of the Los Angeles River and is separated from the Los Angeles River by existing roads, buildings and rail tracks. Still, special status

[57] California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, February 2021.

[58] United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, https://ecos.fws.gov/ecp/report/species-listings-by-state?stateAbbrev=CA&stateName=California&statusCategory=Listed, accessed March 12, 2021.

[59] City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

birds could potentially nest in the trees on and adjacent to the Project Site during the nesting season (typically February 1 to September 15). As the Project would require the removal of some existing trees to make way for the proposed improvements, and as these trees could potentially include special status birds during the nesting season, Project construction activities could potentially adversely affect special status birds. Hence, the Project shall incorporate the following mitigation measure :

Mitigation Measure BIO-MM-1: Construction in areas with trees and vegetation that may provide nesting habitat for birds shall be reduced to the maximum extent feasible. Any tree removal shall be minimized and performed outside of the bird nesting season (typically February 1 to September 15) to the extent feasible. In the event removal of trees must be conducted during the bird nesting season, nesting bird surveys shall be completed of said trees by a qualified biologist no more than 48 hours prior to removal to determine if nesting birds are within the affected trees. Nesting bird surveys shall be repeated if removal activities are suspended for five days or more.

In the event construction is scheduled during bird nesting season, nesting bird surveys shall be completed no more than 48 hours prior to construction to determine if nesting birds and active nests are in or within 500 feet of the construction area. Surveys shall be repeated if construction activities are suspended for five days or more. In the event nesting birds are found within 500 feet of the construction area, appropriate buffers (typically 150 feet for songbirds and 500 feet for raptors) shall be implemented, in coordination with the California Department of Fish and Wildlife, to ensure that nesting birds and active nests are not harmed. Buffers shall include fencing or other barriers around the nests to prevent any access to these areas and shall remain in place until birds have fledged and/or the nest is no longer active, as determined by a qualified biologist.

With incorporation of Mitigation Measure BIO-MM-1 into the Project, the Project would not 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 CDFW or the USFWS. Therefore, the Project's impact would be less than significant.

b. Would the project 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 Wildlife or U.S. Fish and Wildlife Service?

No Impact. As described above, the Project Site is located in an urbanized area and is currently developed with a Los Angeles Times printing plant, vehicular maintenance building, ancillary buildings, and surface parking. No riparian or other sensitive natural community exists on the Project Site or in the area surrounding the Project Site.[60,61] Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County

[60] California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS) https://apps.wildlife.ca.gov/bios/, accessed March 15, 2021.

[61] United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed March 15, 2021.

of Los Angeles.[62,63] In addition, there are no other sensitive natural communities identified by the CDFW or the USFWS within the Project Site or in the areas surrounding the Project Site.[64,65,66] As detailed above in Checklist Question No. I.c., although the Project is located within the boundaries of the RIO District, the Project Site is located approximately 0.43 mile west of the Los Angeles River and is separated from the Los Angeles River by existing roads, buildings and rail tracks. Development of the Project would not conflict with the RIO District or with the Los Angeles River Design Guidelines. Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no mitigation measures would be required.

Nevertheless, the Project would support the relevant Objective 2 of the Los Angeles River Guidelines, which calls for employing high quality, attractive and distinguishable architecture and designing the Project in substantial compliance with the Citywide Design Guidelines, as detailed above in Checklist Question No. I.c. Therefore, the Project would not conflict with the RIO District or with the Los Angeles River Design Guidelines.

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. As described above, the Project Site is located in an urbanized area. No water bodies or state or federally protected wetlands exist on the Project Site or in the immediate vicinity of the Project Site.[67] As such, the Project would not have an adverse effect on state or federally protected wetlands. No impact would occur, and no mitigation measures would be required.

d. Would the project 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 With Mitigation Incorporated. As discussed above, the Project Site and the areas surrounding the Project Site are urbanized and fully developed, and there are no large expanses of open space areas within or surrounding the Project Site that provide or could provide linkages to natural open space areas and that could serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined

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62 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

63 Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

64 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS) https://apps.wildlife.ca.gov/bios/, accessed March 15, 2021.

65 California Department of Fish and Wildlife, CDFW Lands, https://apps.wildlife.ca.gov/Lands, accessed March 15, 2021.

66 United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed March 15, 2021.

67 U.S. Environmental Protection Agency, NEPAssist, www.epa.gov/nepa/nepassist, accessed March 15, 2021.

by the City of Los Angeles or County of Los Angeles,[68,69] and, as discussed above, would not adversely affect the River or any of its tributaries.

The Project Site is relatively flat with ornamental landscaping. As discussed in the Tree Inventory Report prepared for the Project, included in Appendix IS-2 of this IS/MND, 122 trees are currently located on-site, including Canary Island date palms, Indian laurels, Mexican fan palms, river red gums, carrotwoods, edible figs, and a weeping fig, and there are 51 street trees adjacent to the Project Site.[70] Of the 122 existing trees located on-site, 28 would be relocated, 69 would be removed, and 25 trees would remain in place. The Project would plant 164 new on-site trees in accordance with requirements of the City of Los Angeles Landscape Ordinance 170,978. As such, at buildout, a total of 217 trees would be located on-site. Of the 51 existing street trees, five trees would be removed and 46 street trees would be retained. The Project would plant 19 new street trees. Existing street trees to remain in the City right of way would be maintained and protected during construction of the Project, utilizing standard tree protection practices and measures.[71] All new trees would be planted in accordance with the City's requirements. As such, at buildout, a total of 65 trees would be located in the public right-of-way.

Although unlikely, the existing trees could potentially be providing nesting sites for migratory birds. However, the Project would increase the number of trees on-site and the number of street trees, and therefore the number of potential nesting sites. The Project would also be required to comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish and Game Code Section 3503 states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." No exceptions are provided in the California Fish and Game Code, and CDFW has never promulgated any regulations interpreting these provisions. As such, the Project's incorporation of Mitigation Measure BIO-MM-1, discussed above, would ensure compliance with the Migratory Bird Treaty Act and California Fish and Game Code and thereby ensure that potential impacts to nesting birds, if any, would be avoided. By increasing the number of trees on-site and street trees, with incorporation of Mitigation Measure BIO-MM-1 and with compliance with the Migratory Bird Treaty Act, the Project would not interfere substantially with the movement of any native resident or migratory wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Therefore, the Project's impacts would be less than significant with mitigation incorporated.

e. Would the project 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)?

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68 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

69 Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

70 Carlberg Associates, 8th & Alameda Project—2000 East 8th Street, Los Angeles, California—Tree Inventory Report, April 23, 2021.

71 If it is subsequently determined that it is not feasible to maintain these trees (e.g., due to changes in project design or access), removal of those trees would be required to comply with the City's street tree removal procedures, and replacement trees would be required to be provided in conformance with the City's current guidelines and policies.

Less Than Significant Impact. The City of Los Angeles Protected Tree and Shrub Ordinance (Ordinance 186873, LAMC Chapter IV, Article 6) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, California Bay trees, Mexican Elderberry shrubs, and Toyon shrubs of at least 4 inches in diameter at breast height or four and one-half feet above the ground level at the base of the tree or shrub. These tree and shrub species are defined as "protected" by the City of Los Angeles. Trees or shrubs that have been planted as part of a tree planting program are exempt from the City's Protected Tree and Shrub Ordinance and are not considered protected. The City's Protected Tree and Shrub Ordinance prohibits, without a permit, the removal of any regulated protected tree, including "acts that inflict damage upon root system or other parts of the tree or shrub…" The protected tree or shrub must be replaced within the property by at least four specimens of a protected variety, except where the protected species is relocated pursuant to the LAMC. In addition, a protected tree shall only be replaced by other protected tree varieties and shall not be replaced by shrubs. A protected shrub shall only be replaced by other protected shrub varieties and shall not be replaced by trees, to the extent feasible as determined by the Advisory Agency, Board of Public Works, or a licensed or certified arborist.

Of the 122 trees currently located on-site, 28 would be relocated, 69 would be removed, and 25 trees would remain in place. Based on the Tree Inventory Report included in Appendix IS-2 of this IS/MND, none of the on-site trees is considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.[72] The Project would plant 164 new on-site trees in accordance with requirements of the City of Los Angeles Landscape Ordinance 170,978. As such, at buildout, a total of 217 trees would be located onsite. Of the 51 existing street trees, five trees would be removed and 46 street trees would be retained. The Project would comply with the City of Los Angeles Protected Tree and Shrub Ordinance by planting 19 new street trees. As such, following approval from the Bureau of Street Services and Urban Forestry Division, a total of 65 trees would be located in the public right-of-way at buildout.

Additionally, the LA River Design Guidebook encourages native landscaping, which would provide for native habitat and facilitate the health and mobility of native wildlife species. The Project would comply with LAMC Section 13.17 F, which requires 75 percent of any Project's newly landscaped area to be planted with any combination of the following: native trees, plants and shrubs, or species defined as WatershedWise, or species listed in the Los Angeles County River Master Plan Landscaping Guidelines and Plant Palettes. Some species listed in the Los Angeles County River Master Plan Landscaping Guidelines and Plant Palettes which may be included in the Project include: giant ryegrass (*Leymus condensatus*), black sage (*Salvia mellifera*), white sage (*Salvia apiana*), and deer grass (*Muhlenbergia rigens*).

Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no mitigation measures would be required.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

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[72] Carlberg Associates, City of Los Angeles Tree Inventory Report—8th & Alameda Project, 2000 East 8th Street, Los Angeles, California 90402, April 23, 2021. See Appendix IS-2 of this IS/MND.

No Impact. The Project Site is located in an urbanized area and is currently developed with a Los Angeles Times printing plant, vehicular maintenance building, ancillary buildings, and surface parking. As previously described, the Project Site does not support any habitat or natural community, and the Project Site is not contained within or part of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan.[73] Therefore, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plan. No impact would occur, and no mitigation measures would be required.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

The following analysis is based on the Historic Resources Technical Report (HRTR) prepared for the Project by Architectural Resources Group (ARG) dated March 2021 and included as Appendix IS-3 of this IS/MND.

No Impact. The term "historical resource" includes, but is not limited to, "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (California PRC Section 5020.1(j)). In 1992, the California legislature established the California Register of Historical Resources (CRHR) "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1(a)). The criteria for listing resources on the CRHR were expressly developed to be in accordance with criteria developed for listing in the National Register of Historic Places (NRHP), enumerated below. According to PRC Section 5024.1(c)(1–4), a resource is considered historically significant if it: (i) retains "substantial integrity"; and (ii) meets at least one of the following criteria:

> *(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.*

[73] California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019.

(2) Is associated with the lives of persons important in our past.

(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

(4) Has yielded, or may be likely to yield, information important in prehistory or history.

As discussed in the HRTR, in order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (see 14 California Code of Regulations [CCR] § 4852(d)(2)).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

Section 15064.5 of the CEQA Guidelines generally defines a historic resource as a resource that is: (1) listed in, or determined to be eligible for listing in the CRHR; (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code). Additionally, 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 may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the CRHR.

The Project Site contains the Plant, completed in 1989, a number of smaller ancillary buildings and structures, and extensive surface parking areas.

As discussed in detail in the HRTR, the Plant was designed by Anthony Lumsden, FAIA, of the firm Daniel, Mann, Johnson & Mendenhall (DMJM). With regard to previous evaluations, the Plant has not been formally designated under federal, state, or local programs. It also has not been previously evaluated for historical significance under any survey or project-specific evaluation. It is not listed in the California Historical Resource Inventory (HRI) or the Built Environment Resource Database (BERD) and was also not identified in any of the City's historic resource survey efforts for SurveyLA within the Central City North Community Plan area. At only 32 years of age as of 2021, the Plant is generally too young to be considered a historical resource. Federal and state eligibility criteria have age requirements that safeguard against the designation of properties of "passing contemporary interest," ensuring these designation programs remain lists of truly historical resources. However, due to the fact that the subject building was designed by an internationally acclaimed architect, Anthony Lumsden, FAIA of DMJM, it was evaluated for its potential to have exceptional importance such that it meets eligibility criteria despite its very young age. ARG evaluated the Plant to determine whether it appears to be eligible for listing in the

National Register of Historic Places, California Register of Historical Resources, and/or as a Los Angeles Historic-Cultural Monument (HCM).

The HRTR analysis incorporates the guidance set forth by the California Office of Historic Preservation (OHP) as well as National Register Criteria Consideration G, a set of evaluative guidelines for assessing the significance of resources from the recent past (generally defined as those constructed within the past 50 years). The City of Los Angeles's Cultural Heritage Ordinance (Ordinance No. 185472, amending Section 22.171 of Article 1, Chapter 9, Division 22 of the Los Angeles Administrative Code) does not contain language regarding the required age of potential HCMs. In the absence of guidance in this regard, ARG used OHP guidelines for evaluating resources from the recent past in the application of local criteria, in accordance with best professional practices.

National Register of Historic Places and California Register of Historical Resources

National and California Register Criteria A/1: associated with events that have made a significant contribution to the broad patterns of history.

The Plant is associated with the late 20th century growth of the Los Angeles Times (Times), a significant and influential newspaper founded in 1881. The Times grew along with the City (and a number of competing news publications) until it was the largest newspaper on the West Coast. Completed in 1989, the Plant was the sixth Times printing facility, post-dating satellite printing facilities in Costa Mesa (1968, including a newsroom) and Chatsworth (1983) as well as four combined newsroom/office/printing press locations in downtown Los Angeles dating from 1881 to 1935. The Plant's construction reflected the need for a new purpose-built facility to handle the Times' exploding circulation during the 1980s as Los Angeles became a truly global city. With the Plant's opening, the Times completed the shift of all printing functions away from the paper's downtown headquarters (Times Mirror Square), and the Plant later took over printing from the Costa Mesa and Chatsworth plants when they closed.

The Plant is associated with the growth and development of the Times, a historically significant entity on both state and national levels. However, it is only one of multiple properties associated with the Times, including the most notable property, Times Mirror Square (1935, with additions in 1948 and 1973). Furthermore, as discussed above, the Plant is 32 years of age and does not meet the 50-year threshold for National Register eligibility, and research did not find it to have exceptional significance as required for eligibility under Criterion Consideration G. Although the California Register does not have a specific age criterion, guidelines state that "sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource."[74] The Plant is a standard industrial printing facility for its time period and is not unique or exceptional in terms of its function, association, or embodiment of historic industrial development patterns. Research did not uncover scholarship suggesting that this property is exceptionally significant for its association with the Times or with larger patterns of historical development. In fact, aside from perfunctory mentions in self-published timelines of Times history by the Times itself, it does not appear in any known periodicals, published histories of the Times, studies of printing plant typology, or studies of industrial property types in general. Therefore, the property does not appear eligible under Criteria A/1 of the National and California Registers.

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[74] California Office of Historic Preservation, Technical Assistance Series #6: California Register and National Register: A Comparison (Sacramento, CA: California Department of Parks and Recreation, 2001), 3.

National and California Register Criteria B/2: associated with the lives of persons significant in our past.

Research did not suggest that the Plant was directly associated with any significant individuals, including former owners or employees of the Times. The Plant does not appear eligible under Criteria B/2 of the National and California Registers.

National and California Register Criteria C/3: embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction.

The Plant embodies distinctive characteristics of the Late Modern style, including complex geometric massing and articulation; an exaggerated sense of abstraction; manipulation of compositional systems (including extrusion of sections); flat rooflines; unrelieved exterior wall surfaces of painted metal; ribbon windows; and absence of historical references or superfluous ornament.

As previously discussed, the Plant was designed by master architect Anthony Lumsden of DMJM, known for his development (with Cesar Pelli) of the glass skin variant of Late Modernism and renowned for a number of dynamic Modern designs in Los Angeles. Lumsden is widely regarded as one of the nation's most important late modernists, as reflected by his work's many architectural awards and his iconic designs in Los Angeles, Seoul, and elsewhere—not to mention the ubiquity of the glass skin form he pioneered. Due perhaps to DMJM's corporate structure and wide range of client and property types, Lumsden's work has not received the same level of scholarship and discussion as that of some of his peers. The Plant was one of Lumsden's last completed commissions during his tenure with DMJM, which ended in 1994. His last decade of work with DMJM was as fruitful as his earlier years; during this time, his growing confidence in his own style successfully combined dynamic sections and stretched skins. Like his other designs from the 1980s and early 1990s, the Plant conveys Lumsden's ability to transform otherwise utilitarian structures into sculptural forms.

However, as a young resource of only 32 years of age, the Plant must meet National Register and California Register age considerations in order to be eligible for listing. Therefore, an analysis of these considerations is provided below:

National Register Age Requirement: Criteria Consideration G

According to National Register Criteria Consideration G, it is not enough for a resource to simply meet the conditions enumerated in the criteria to justify eligibility for the National Register if the resource being evaluated is less than 50 years of age. For resources that are not yet 50 years of age, it must be demonstrated that the resource is not merely significant but exhibits exceptional importance within its requisite historic context(s). This consideration "guards against the listing of properties of passing contemporary interest" and ensures that enough time has elapsed to develop historical perspective.[75]

Determining whether a resource is exceptionally significant for purposes of the National Register requires comparative analysis of the resource against contextually related properties. If, when the resource is

[75] Derived from National Register Bulletin 15, Section VII: "How to Apply the Criteria Considerations."

compared to others, it becomes evident that (1) it is the property that best represents the historic context in question, or (2) represents a type so rare or fragile that extant examples of any age are unusual, it is generally considered to meet Criteria Consideration G.[76]

As discussed in detail in the HRTR, the Plant does not meet the National Register's 50-year age threshold and research did not find it exceptionally significant per Criterion Consideration G. Scholarship evidenced in multiple publications confirms the importance of Lumsden's work and his legacy as a Modern architect, but the Plant itself appears in only one self-published monograph and is otherwise not mentioned as a notable or influential design by either Lumsden or DMJM. Extensive research into architectural periodicals and journals did not reveal any articles at the time discussing the building's design or construction, and scholarship regarding Lumsden's significance as an architect do not discuss the Plant as a pivotal or important work. In Los Angeles, there are several other examples of 1980s-1990s work by Anthony Lumsden that received far more critical acclaim both at the time of their construction and with the passing of time, most notably the Tillman Water Reclamation Facility and the Hyperion Wastewater Treatment Plant. His design for the Moscone Convention Center in San Francisco (completed 1992) is commonly cited as a notable work from Lumsden's last years at DMJM, while the Ontario International Airport Terminal (completed 1998) is a well-known design from his post-DMJM career. Other Los Angeles Lumsden designs that have received far more scholarly and public attention than the Plant include Century City Medical Plaza (1969, with Cesar Pelli); One Park Plaza (1971); the Hertz Turnaround Facility near LAX (1971); the Century Bank Building (1972); the FAA building (1973, with Cesar Pelli); Manufacturers Bank (also known as Roxbury Plaza, 1974); and the University Bus Station (1975).

The comparative analysis of the Plant against contextually related properties did not find it to be a significant example of Anthony Lumsden's work, the best representative of its historic contexts, or a type so rare or fragile that extant examples are unusual. Therefore, the Plant does not meet the requirements of Criterion Consideration G.

California Register Age Requirement

The California Register does not set forth a minimum age requirement for listing, but stipulates that sufficient time must have elapsed to have a scholarly perspective on the historical significance of a resource to be eligible for listing. As detailed in the HRTR, a review of monographs, articles and other materials related to Lumsden's built projects did not disclose that the Plant is considered by critics, scholars, or the architectural community as a seminal work. In fact, the Plant was not discussed at all either at the time of its design and construction or in more recent publications regarding Lumsden's work and career, except in a self-published Times monograph.

In conclusion, while the Plant generally represents the Late Modern style and work of Anthony Lumsden and DMJM, it is not an exceptionally important or pivotal work. Taking into account the high eligibility thresholds for resources of the recent past, the Plant does not satisfy National/California Register Criterion C/3 at this time.

[76] Ibid.

National and California Register Criteria D/4: has yielded or may likely yield information important in prehistory or history.

A records search for known archaeological resources that was conducted for the Project Site and a 0.25-mile radius around it yielded no known resources. As no subsurface sensitivities are known to exist, resources that meet National/California Register Criterion D/4 are not likely to be present.

Los Angeles Historic-Cultural Monument (HCM)

Los Angeles HCM Criteria 1-3 generally mirror those of National Register and California Register Criteria A/1–C/3. As previously stated, the local ordinance does not include requirements regarding the age of potential HCMs. Rather, the City typically follows OHP guidance on the evaluation of recent-past resources, and only rarely are resources younger than 45-50 years of age designated as HCMs. However, taking into account the inherent flexibility in the local age requirement due to the absence of language in the Cultural Heritage Ordinance, the Plant's eligibility against HCM criteria is separately evaluated herein.

Local Criterion 1: Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community.

As previously stated in the evaluation under National/California Register Criteria A/1, the Plant is associated with the historical development of the Times during the late 20th century, when the newspaper saw its largest increases in circulation and influence. The Plant is notable as the Times' last and largest purpose-built facility constructed prior to the 21st century shift from print to digital media. However, the Plant is neither the only nor the best-known property associated with the Times; the Times Mirror Square complex is the property most closely associated with the Times, and the property with the longest and strongest period of association, and includes the iconic 1937 Gordon Kaufmann-designed Times headquarters building. The Plant's association with the Times is clear but recent, and relatively short in comparison to the Times' downtown headquarters. Thus, the Plant is not eligible under local Criterion 1.

Local Criterion 2: Is associated with the lives of historic personages important to national, state, or local history.

For the reasons stated in the evaluation under National/California Register Criteria B/2, the Plant is not eligible for listing under local Criterion 2. Research did not disclose that any of the individuals associated with the Times were significant to the history of the City, state, or region in a way that is directly associated with the Plant.

Local Criterion 3: Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

As stated in the assessment under National/California Register Criteria C/3, the Plant embodies the distinctive characteristics of the Late Modern style as applied to an industrial building and represents the work of local master architect Anthony Lumsden of DMJM. It reflects approaches and themes characteristic of Lumsden's work, but given its young age, the Plant does not appear to meet the local threshold of "notable work" in comparison to Lumsden's other projects in the City mentioned above. The Plant also does not exhibit characteristics of Lumsden's best-known innovation, the glass skin, nor does it

appear to be a pivotal example of his later "high tech" work. It bears mentioning that the City's citywide historic context statement for Late Modernism specifies a period of significance of 1966-1990, and amidst extensive discussion of Anthony Lumsden and his work in Los Angeles, the Plant is not mentioned as a significant work. In contrast, several of Lumsden's other projects in the City are discussed at some length. In addition, the Plant was not identified as eligible in the SurveyLA survey of Central City North.

For these reasons, the Plant does not meet HCM Criterion 3.

Los Angeles Historic Preservation Overlay Zone

The Plant's surroundings are largely industrial, reflecting a wide range of construction dates, scales, and architectural styles. No single, cohesive development pattern or style is represented, and this area was not identified as a potential Historic Preservation Overlay Zone in the Central City North Community Plan Area during SurveyLA. The Plant and Project Site do not appear to be a contributor to a potential Historic Preservation Overlay Zone.

In summary, based on the above discussion and as concluded in the HRTR, the Plant is not eligible under federal, state, or local designation criteria, and therefore does not meet the definition of a historical resource under CEQA. Thus, there are no historical resources located on the Project Site, and the Project would not have a direct impact on historical resources.

Historical Resources Adjacent to the Project Site

With regard to potential indirect impacts, while there are no historical resources on the Project Site, there are two historic resources that are immediately adjacent to the Project Site.[77] Refer to page 44 of the HRTR included as Appendix IS-3 of this IS/MND for an aerial photograph showing the locations of these historical resources. These include the Overland Terminal Produce Warehouse (Warehouse) located at 872 S. Alameda Street and the Western Electric Company Historic District (Historic District) located at 800-822 McGarry Street and 1753 E. Olympic Boulevard. An analysis of the potential effect of the Project on each of these resources is described below.

Overland Terminal Produce Warehouse

The Warehouse is located directly to the southwest of the Project Site, on a parcel that is separated from the Project Site by Hunter Street to the north and Lawrence Street to the east. The Warehouse parking lot, which is north of the Warehouse building, is surrounded by a tall fence and an even taller (approximately 12-18' tall) privacy hedge, with an opening for a driveway/vehicular entrance.

The Project Site is currently improved with surface parking in the area directly to the north of the Warehouse. The Warehouse's eastern edge is directly across Lawrence Street from the southwestern edge of the Plant. The Project would reconfigure the existing surface parking lot and add three new three-

[77] Adjacent resources are defined as those historic resources with direct adjacency to the Project Site, either within its viewshed or with a view of it. Although there are other historical resources nearby (within a 0.25-mile radius), they are not within view or direct adjacency of the Project Site; therefore, the Project does not have the potential to impact their significance or integrity.

story soundstage buildings of roughly 49,100 sf to 51,600 square feet each. One building would be located along Hunter Street, the other along Alameda Street, and the third along 8th Street. The new buildings along Hunter and Alameda Streets would have adjacency to the Warehouse. The Plant, adjacent to the east edge of the Warehouse, would remain unchanged in size and scale.

At six stories tall, the Warehouse would remain considerably larger and taller than the three new buildings to be constructed to the north, on the Project Site. The primary public views of the Warehouse are from Olympic Boulevard to the south and Alameda Street to the west, and these views would remain unchanged by the Project, which is located to the north and east. There are no existing important views of or from the Warehouse from any direction that would be blocked by the Project.

The historic setting of the Warehouse has already been significantly changed due to the construction of the Plant in the late 1980s, replacing what had been an expansive railyard with what appears to have been train sheds immediately to the north of the Warehouse. Therefore, the addition of the Project's three-story buildings and nine-story parking structure to the north of the Warehouse would not modify or compromise the historic setting of the Warehouse building as its setting is already lost.

For these reasons, the significance of the Warehouse, which is adjacent to the Project Site, would not be impaired by the Project.

Western Electric Company Historic District

The Historic District is comprised of two buildings located to the west of the Project Site, across Alameda Street.

The Project would add a three-story soundstage and support/office building of 49,100 square feet at the west edge of the Project Site, directly across Alameda Street from the Historic District. At four and five stories tall, the two Historic District contributors would remain considerably larger and taller than the new building to be constructed on the Project Site to the east. The primary public views of the Historic District are from Alameda Street, and these views would remain unchanged by the Project. There are no important views of or from the Historic District from any direction that would be blocked by the Project.

Furthermore, the historic setting of the Historic District has already been significantly modified due to the removal of structures on its site (on what is currently surface parking) around the mid-20th century. The construction of the Plant in the late 1980s further changed its setting, replacing what had been an expansive railyard with what appear to have been train sheds immediately to the east of the Historic District. Therefore, the addition of three-story buildings and a nine-story parking structure on the Project Site across Alameda Street from the Historic District, would not further modify or compromise its historic setting as its setting is already compromised.

For these reasons, the significance of the Historic District, which is adjacent to the Project Site, would not be impaired by the Project.

Therefore, based on the above and as concluded in the HRTR, the Project would not result in an indirect impact on the two identified historical resources.

Thus, the Project would not cause, directly or indirectly, a substantial adverse change in the significance of a historical resource pursuant to § 15064.5. No direct or indirect impacts related to historical resources would occur, and no mitigation measures are required.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to state CEQA Guidelines §15064.5?

The following analysis is based on the *Ground Penetrating Radar Investigation Results and Archaeological Resources Recommendations* (Archaeological Resources Report) prepared for the Project by Dudek dated August 10, 2021, and included as Appendix IS-4 of this IS/MND.

Less Than Significant Impact with Mitigation Incorporated. Archaeology is the recovery and study of material evidence of human life and culture of past ages. A California Historical Resources Information System Review (CHRIS) records search at the South Central Coast Information Center (SCCIC) was conducted on March 17, 2021, for the Project Site and a surrounding 0.5-mile radius of the Project. The records search included SCCIC's collections of mapped prehistoric and historic archaeological resources and historic built environment resources; Department of Parks and Recreation (DPR) site records; technical reports; archival resources; and ethnographic references. Additional consulted sources included historical maps of the Project area, the NRHP, CRHR, the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility. The results of the confidential records search (Confidential Attachment B of the Archaeological Resources Report) are on file at the City for review by qualified individuals.

As discussed in the Archaeological Resources Report, SCCIC records indicate that a total of 78 previously recorded cultural resources fall within 0.5-mile of the Project Site; none of these resources intersect or overlap the Project Site. Of these, only two resources are historic-aged archaeological resources: P-19-002793 including historic railroad and associated materials, approximately 1,800 feet from the Project Site; and P-19-003777 isolated historic artifacts such as ceramic insulator fragments, glass fragments, and building materials 2,250 feet from the Project Site. No prehistoric sites or resources documented to be of specific Native American origin have been previously recorded within the Project Site or 0.5-mile search buffer.

The SCCIC records search also indicated that 31 previous cultural resources studies have been conducted within 0.5-mile of the proposed Project site between 1986 and 2017. Of these, one previous cultural resources technical study, LA-13239, intersected the western portion of the Project Site. Report LA-13239 was completed by Cogstone Environmental and attempted to identify the extent of the zanja network. The zanja network was the City Los Angeles' original irrigation system, and the network is thought to have run throughout the city in various branches, predominantly along major roads. The location of many of the segments are unconfirmed; however, the believed route has been identified by Blake Gumprecht who incorporated information from multiple historical works in 2001, particularly a report on irrigation by state engineer William Hamilton Hall. Using Gumprecht's 2001 work, Cogstone Environmental prepared a series of maps for the Downtown Los Angeles area based on this historical data, discussed further below.

As described in detailed in the Archaeological Resources Investigation, the zanja network was Los Angeles' original irrigation system. The network is thought to have run throughout portions of the early

city in various branches, predominantly along major roads. The water conveyance system consisted of interconnected ditches known as "zanjas" and was established in 1781 at the same time that El Pueblo de la Reyna de Los Angeles (The Town of Los Angeles) was founded. The first segment of the system was known as the Zanja Madre, and is thought to have run from a point on the Los Angeles River north of the original city, south near present-day Main Street, terminating near the Plaza across Alameda Street from the present-day Union Station). Though researchers and the public often use the term "Zanja Madre" to refer to the larger water conveyance network, this term more accurately describes just the initial component established during the Spanish Period. The segments that were added later were numbered and grouped based on what part of the city they reached and from where on the Los Angeles River they drew water. The size of Los Angeles did not necessitate an expansive system for the first half of the nineteenth century, and there were only three additional segments by 1849. As the city rapidly grew, water become a growing concern, particularly because much of the land was agricultural and irrigation was crucial to farmers' success. As a result, several new zanja segments were constructed post-1855. By 1870, the Zanja Madre, being the most important canal in the system, was maintained at a width of 10 feet along its entire length, and eight other zanja segments had also been built within the city. By the late nineteenth century, there were a total of 19 zanja segments. The segments had been lined with brick, enclosed by concrete piping, or converted to wooden flumes. Though the zanjas were developed to provide water to the fledgling city, the zanjas were also used as disposal sites for garbage, waste, and sewage. This fact led to dysentery and other health problems becoming a common problem in the city, which in turn caused anger and outrage among the citizens. The zanjas became so filthy that wealthy Angelenos refused to get their drinking water from them; instead paying for water taken directly from the river. As the city became more populated and more open zanjas were built throughout the city center, an increasing number of fatal drownings began to occur. Public outcry over these drowning reached a point where the city was forced to take action which resulted in almost all of the zanja segments being enclosed either by concrete piping, or wooden flumes by the mid-1880s to provide safety and efficiency. Ultimately, however, the zanjas were abandoned in the late nineteenth century with the last two abandoned by 1904. Subsequently, any zanja segment that was not adopted into the city's water system was either destroyed or built over.

It should be noted that the Cogstone study includes reference to three DPR forms (P-19-004113, P-19-003103, P-19-0190309) documenting occurrences where segments of the zanja network have been previously encountered. None of the previously recorded segments were documented within or in the vicinity of the Project Site. The P-19-004113 DPR form documents the nearest recorded segment of the zanja network, Zanja No. 6-1, which was encountered in 2008 approximately 2 feet below the ground surface on East Temple Street between Alameda Street and North Garey Street approximately 1.4 miles north of the Project Site in the DPR forms. The record for P-19-003103 includes documentation of a segment of the Zanja Madre in the general vicinity of the Project Site, which was identified near the intersection of North Broadway and Cottage Home Street in 2002; four segments encountered 2 feet below the western sidewalk of Alameda Street between Ord Street and Alpine Street in 2011; and two segments and an associated builder's trench encountered 15 feet below the current ground surface at Blossom Plaza in 2014. Resource P-19-0190309 is a 2009 NRHP Nomination form for a 75-foot segment of the Zanja Madre that was encountered in 2005, southwest of the intersection of North Broadway and Bishops Road. The State Historic Preservation Office (SHPO) response was attached to this form, which indicated that the analysis appeared incomplete, and the nomination has since been withdrawn (see Confidential Attachment C of the Archaeological Resources Report).

Dudek reviewed information detailing the original Zanja Madre network and subsequently constructed segments, including William Hall's 1888 study of irrigation in Southern California and Blake Gumprecht's

work on the History of the Los Angeles River and the Cogstone study. These sources indicate that a zanja segment was once mapped through a portion of the Project Site (Zanja No. 2) and an additional segment is mapped near, but outside of, the Project Site (Zanja No. 1). Both of the two segments would be part of the west-side low-service irrigation system, which irrigated water from the Los Angeles River from the north of the Project Site, where the Zanja Madre originates, traveling south along the river and channeling through the connecting zanja segments and noted to end at the location of Zanja No. 6-1, near the intersection of South Hewitt Street and East 1st Street. Zanja No. 1, mapped approximately 0.10 mile east of the Project Site, is described by Hall in 1888 based on reviewed records as a wooden flume box measuring 800 feet in length. Hall, again based upon previous records of this feature, indicated that this flume transitioned to a section of cement pipe measuring 16 inches in diameter and 3,200 feet in length located off of the Project Site. Neither of these two segments were physically confirmed to be present by Hall in his 1888 survey, though Hall did observe and map the southern end of Zanja No. 1 located near but off the Project Site. Lastly, a portion of Zanja No. 1 was described by Hall as open ditch, which extended from off the Project Site to the then city boundary (present-day Washington Boulevard), which was 9,625 feet in length. Zanja No. 2, mapped as intersecting the western portion of the proposed Project Site, is documented by Hall in 1888 as a wooden flume box and tunnel measuring 3 feet wide and 1 foot tall, traveling parallel to Alameda Street in a northeast to southwest direction. While Hall and the later sources that base their maps on Hall's 1888 work document Zanja No. 2 as intersecting the western portion of the Project Site roughly north-south, it is unclear what became of the wooden flume representing Zanja No. 2. No records of this segment have been observed or documented before or after Hall's observations in 1888, upon which Cogstone and Gumprecht's reports rely.

Dudek also reviewed an 1884 historical map prepared by United States Surveyor H.J. Stevenson, which shows the area where the Project Site is located as being parceled out and sold out to various individuals. A north-south aligned segment, identified in the map as Zanja No. 1 (referred herein as such), is mapped just east of the Project Site and does not appear to intersect with it. Zanja No. 2 is not depicted on this map. An 1887 historical map, prepared by City Surveyor Fred Eaton, shows that, at the time, the Project Site had not yet been subdivided and only Alameda Street and Lemon Street are shown to serve as the Project Site's western and eastern boundaries, respectively. Zanja No. 1 is not referenced on this map. Zanja No. 2, running north-south along the east side of Alameda Street, is represented as ending on the north side of Seventh Street with a label "Flush Inlet". This segment is not mapped as intersecting the Project Site, which is located a block to the south (which differs from the 1888 description of Zanja No. 2 by Hall, discussed above).

As discussed above, as the population of Los Angeles grew, the zanja network was either destroyed, covered, piped, and/or converted and adopted into the city's water infrastructure. By 1904, no zanjas were functioning in their original capacity. There is no evidence to support the conclusion that Zanja Nos. 1 or 2 were converted to cement pipe or conduit which would have made it more likely to have been preserved and would have also made it a more likely candidate to be adopted into new city infrastructure. In light of the fact that the record materials analyzed herein indicate that the portion of Zanja No. 2 that would have intersected the Project Site was a wooden flume, the several iterations of development over the course of the twentieth century on the Project Site is likely to have resulted in their destruction.

Despite its likely destruction, out of an abundance of caution, particularly since one historic report indicated a wooden portion of Zanja No. 2 intersecting with a portion of the Project Site, and the information provided through records search data, a Ground Penetrating Radar (GPR) investigation was

conducted to probe subsurface contexts for structures and changes in soil or material properties that are consistent with a remnant Zanja No. 2 segment that may be present within the Project Site.

Dudek conducted its GPR investigation on March 5, 2021, the results of which are described in detail in the Archaeological Resources Report. The GPR investigation was conducted primarily in asphalt and concrete paved parking lots and driveways where construction and ground disturbance work for the Project would occur. Two landscaped strips of land at the northern and southern ends of the parking lots were also surveyed where only grass was present. Landscaped medians and planters in the parking lots, as well as locations of parked cars, were not directly surveyed. The GPR investigation was focused on the western end of the Project Site, as this is where the unconfirmed Zanja No. 2 alignment was identified by Hall in 1888, as stated above. Figure 3 in Attachment A of the Archaeological Resources Report provides a map illustrating the GPR testing efforts within the Project Site. The majority of transects were oriented east-west as these were expected to be near-perpendicular to the expected orientation of Zanja No. 2. A series of north-south transects were also surveyed, primarily in the far western end of the Project Site. All transect alignments, lengths, and interval spacing were determined in the field based on locations of landscaping features, cars, fences, and buildings.

Based on the GPR results, there is no indication of the presence of intact zanja segments. The zanja, if still present and intact below the surface, would show up regardless of type of its construction as a continuous or near-continuous anomaly extending in a linear pattern at a relatively consistent depth running north-south or northeast-southwest. Furthermore, while the GPR investigation identified two responses that did not appear to directly correspond with the locations of known utilities, these did not provide sufficient evidence to indicate whether such anomalies could represent zanja segments. Given the substantial nature of development by existing utilities, the EJ Stanton Lumber Yard, Union Pacific Railway, and other historic and current development indicated above, the potential for a nineteenth century zanja feature to persist is considered exceedingly low.

Therefore, based on the review of historical information, maps, and the GPR investigation results, and in consideration of the severity of past impacts to subsurface soils, Dudek concluded that there is little potential that any extant zanja segments or other intact archaeological resources are present that could be impacted as a result of Project implementation. While unlikely, unanticipated archaeological deposits or features, including remnants of zanja segments or those associated with previous historical uses such as the EJ Stanton Lumber Yard and Union Pacific Railway, cannot be ruled out as potentially being present at subsurface levels within the Project Site. As such, the Project shall incorporate the following mitigation measure. With implementation of Mitigation Measure CUL-MM-1, Project impacts associated with unanticipated archaeological resources would be less than significant.

Mitigation Measure CUL-MM-1: Impacts to cultural resources shall be minimized through implementation of pre- and post- construction tasks. Tasks pertaining to cultural resources include implementation of a cultural resource monitoring program.

The monitoring program shall include a requirement for the construction contractor and construction personnel to complete a Workers Environmental Awareness Program (WEAP) training conducted by a qualified archaeologist prior to commencement of construction activities for the Project. The WEAP training shall provide: (1) the types and characteristics of archaeological materials that may be identified during construction and explain the importance of and legal basis for the protection of cultural resources; (2) proper procedures to follow in the event that

cultural resources are uncovered during ground-disturbing activities, including procedures for work curtailment or redirection; and (3) protocols for contacting of the site supervisor and archaeological monitor upon discovery of a resource and the (principal archaeologist if a monitor is not present).

The monitoring program shall include periodic archaeological monitoring. The frequency and duration of the periodic monitoring shall be determined by a qualified archaeological principal investigator based on inspection of exposed subsurface soils and their observed potential to contain intact cultural deposits or material. The archaeological monitor shall have the authority to temporarily halt work to inspect areas as needed for potential cultural material or deposits. If potential archaeological resources (i.e., sites, features, or artifacts) are exposed during construction activities of any components of the Project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. This work exclusion buffer may be adjusted based on the recommendation of the archaeological principal investigator. Should it be required, temporary flagging may be installed around this resource in order to avoid any disturbances from construction equipment. Depending upon the nature of the find, a qualified archaeologist may simply record the find to appropriate standards (thereby addressing any data potential) and allow work to continue. The qualified archaeologist will consider revisions to the strategy for required archaeological monitoring during earth-disturbing activities based on review of this unanticipated find and the potential to encounter additional archaeological resources. If the qualified archaeological principal investigator determines the discovery to be potentially significant under CEQA, additional efforts such as preparation of an archaeological treatment plan, testing, and/or data recovery may be warranted prior to allowing construction to proceed in this area. Given site constraints, perseveration in place of any unanticipated resources would likely be infeasible; therefore, data recovery would be the preferred approach, whenever possible. The feasibility of avoidance should be discussed with the City prior to moving forward with excavation or other potentially destructive evaluation efforts. All measures must be approved by the Planning Department. The Applicant shall then comply with measures approved by the Planning Department. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist.

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. As discussed above, the Project Site is located in a fully developed urban setting and has been subjected to previous grading and development. No traditional burial sites have been previously recorded on or within one-half mile of the Project Site according to the SCCIC and NAHC SLF records searches. Thus, the disturbance of human remains is not expected in conjunction with Project grading and excavation activities. Nonetheless, in accordance with Section 7050.5 of the California Health and Safety Code, if human remains are discovered during construction of the Project, the County Coroner will be immediately notified of the discovery. No further excavation or disturbance of the Project Site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working days of notification of the discovery, if the remains are human. If the County Coroner determines that the remains are, or are believed to be, Native American, they shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public

Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall provide recommendations within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains. With the implementation of these regulatory requirements, impacts to human remains would be less than significant, and no mitigation measures are required.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. In order to determine if the Project would result in a potentially significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources during the construction or operation of the Project, an analysis of the Project's energy use for all stages of the Project has been provided. Section 15126.2(b) of the CEQA Guidelines refers to Appendix F of the CEQA Guidelines as guidance for the information to be provided in the analysis. Appendix F provides the following topics that the lead agency may consider in the discussion of energy use in an EIR, where such topics are applicable or relevant to the project:

- The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
- The effects of the project on local and regional energy supplies and on requirements for additional capacity;
- The effects of the project on peak and base period demands for electricity and other forms of energy;
- The degree to which the project complies with existing energy standards;
- The effects of the project on energy resources; and/or

- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

In accordance with the considerations above, the following analysis evaluates the potential energy impacts of the Project with a particular emphasis on whether the Project would result in the inefficient, wasteful, or unnecessary consumption of energy. The supporting energy calculations are included in Appendix IS-5 of this IS/MND.

Construction

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

As shown in Table 5 on page 89, it is estimated that a total of 45,271 kilowatt-hours (kWh) of electricity, 156,754 gallons of gasoline, and 251,222 gallons of diesel fuel would be consumed during Project construction.

Electricity

Electricity would be supplied to the Project Site by LADWP and would be obtained from existing infrastructure serving the Project Site. As shown in Table 5, approximately 45,271 kWh of electricity would be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Moreover, construction electricity usage would replace the existing electricity usage associated with removal of portions of the existing buildings at the Project Site during construction.[78] In addition, although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (greater than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements (includes limits on the wattage allowed per specific area), which would result in the conservation of energy. Therefore, the use of electricity during Project construction would not be wasteful, inefficient, or unnecessary.

Natural Gas

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

[78] As shown in Appendix IS-5, electricity usage for existing uses would be 9,054,577 kWh per year which is greater than construction electricity usage of 45,271 kWh. Electricity usage during Project construction would replace some of the electricity usage due to removal of existing uses.

Table 5
Summary of Energy Use During Construction[a]

Fuel Type	Quantity
Electricity	
Water Consumption (Dust Control)[b]	21,180 kWh
Construction Temporary Power (Lighting, power tools)	24,091 kWh
Total Electricity	**45,271 kWh**
Gasoline	
On-Road Construction Equipment	156,754 gallons
Off-Road Construction Equipment	0 gallons
Total Gasoline	**156,754 gallons**
Diesel	
On-Road Construction Equipment	98,267 gallons
Off-Road Construction Equipment	152,955 gallons
Total Diesel	**251,222 gallons**

kWh = kilowatt-hour

Note: Numbers may not add up exactly due to rounding.

[a] *Detailed calculations are provided in Appendix IS-5 of this IS/MND. Construction assumptions are contained in Appendix IS-1 of this IS/MND, Construction Schedule and Equipment Requirements, and were obtained from DPR Construction. Construction energy usage conservatively does not account for the offsetting energy usage from decommissioning of existing operational uses during construction. All construction energy usage estimates are considered new energy usage.*

[b] *Energy usage associated with supply and conveyance of water from the source.*

Source: Eyestone Environmental, April 2021.

Transportation Energy

As shown in Table 5, on- and off-road vehicles would consume an estimated 156,754 gallons of gasoline and approximately 251,222 gallons of diesel fuel throughout the Project's construction. The consumption of petroleum-based fuels during construction would be temporary and would cease upon the completion of construction. The consumption of petroleum-based fuels would also vary throughout construction of the Project as certain phases of construction would require greater use of petroleum-based fuels than other phases of construction. In addition, with regard to trips for hauling demolition material, the City has adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems with which the Project would comply, as discussed in Response to Checklist Questions XIX.d and XIX.e. Furthermore, trucks and equipment used during construction activities would comply with CARB's anti-idling regulations, as well as the In-Use Off-Road Diesel-Fueled Fleets regulation.[79,80] In addition to reducing criteria pollutant emissions, the Project's compliance with the

[79] CARB, ATCM to Limit Diesel-Fueled Commercial Motor Vehicle Idling, www.arb.ca.gov/regact/idling/idling.htm, accessed August 10, 2021.

[80] CARB, In-Use Off Road Diesel-Fueled Fleets Regulation Overview, www.arb.ca.gov/msprog/ordiesel/faq/overview_fact_sheet_dec_2010-final.pdf.

anti-idling and emissions regulations would also result in the efficient use of energy during construction and reduce fuel consumption. On-road vehicles (i.e., haul trucks, worker vehicles) would also be subject to Federal fuel efficiency requirements. In addition, the Project Site provides convenient access to public transit, which provides construction workers with an alternative to passenger vehicles for traveling to and from work. Therefore, the Project's compliance with these regulations and the Project Site's location would reduce the number of construction-related trips and the amount of fuel consumed during construction which, in turn, would reduce the wasteful, inefficient, and unnecessary consumption of energy. Therefore, the use of gasoline and diesel fuel during Project construction would not be wasteful, inefficient, or unnecessary.

Construction Materials

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

Conclusion

Based on the above, construction of the Project would not have a substantial impact on local or regional energy supplies, peak demand for electricity, or energy resources. In addition, construction of the Project would comply with existing applicable energy standards and would not be wasteful, inefficient, or unnecessarily consume energy resources. Thus, Project energy resources impacts during construction would be less than significant, and no mitigation is required.

Operation

During Project operation, energy would be consumed for multiple purposes including, but not limited to, heating/ventilating/air conditioning (HVAC), refrigeration, lighting, electronics, office equipment, and commercial machinery (including kitchen appliances). Energy would also be consumed during Project operation related to water usage, solid waste disposal, and vehicle trips. Operational energy usage is assessed based on the Project's incremental increase in energy usage. Therefore, calculation of the Project's operational energy usage is the difference in energy usage from Buildout land uses and Existing land uses for the Buildout year (2026). Annual energy use has been calculated for buildout of the Project and is shown in Table 6 on page 91. As shown in Table 6, a total of 2,149,680 kWh of electricity, 1,019,155 cubic feet of natural gas, 56,870 gallons of gasoline, and 9,527 gallons of diesel fuel would be consumed during Project operation. Detailed calculations for existing and future Project uses are provided in Appendix IS-5 of this IS/MND.

Table 6
Summary of Total Annual Energy Use During Operation[a]

Source	Project with Project Features
Electricity	
Building	2,637,807 kWh
Water	347,906 kWh
Photovoltaic System	(839,044) kWh
Total Electricity	**2,149,680 kWh**
Natural Gas	**1,019,155 cf**
Mobile	
Gasoline	56,870 gallons
Diesel	9,527 gallons
Total Transportation Fuel	**66,398 gallons**

cf = cubic feet

kWh = Kilowatt-hour

[a] *Detailed calculations are provided in Appendix IS-5 of this IS/MND. Energy usage includes the entire Project Site (existing uses to remain + new construction).*

Source: Eyestone Environmental, April 2021.

Electricity

During operation of the Project, there would be a net increase in electricity usage on the Project Site compared to existing conditions due to the additional square footage to be constructed. As shown in Table 6, with buildout of the Project, the on-site electricity demand would increase by approximately 2,149,680 kWh of electricity per year. The Project would comply with requirements of the Los Angeles Green Building Code and CalGreen/Title 24 energy efficiency requirements, which were adopted to reduce energy consumption. [81,82] The Project would be subject to the 2019 Title 24 standards, which represent "challenging but achievable design and construction practices" that represent "a major step towards meeting the ZNE goal." Nonresidential buildings built in compliance with the 2019 standards use about 30 percent less energy than those under the 2016 standards.[83] This analysis conservatively includes only a 10-percent reduction in the CalEEMod calculated energy use to account for compliance with 2019 Title 24 standards. Such measures include enhanced insulation, energy efficient ventilation systems, double paned windows and use of light emitting diode (LED) lighting where appropriate. These standards are designed to, and would, reduce energy, water usage and waste and, thereby, reduce associated energy and help minimize the impact on natural resources and infrastructure. Furthermore, the sustainability features to be incorporated into the Project would include, but not be limited to, high efficiency dual-flush toilets with a flush volume of 1.28/1.1 gallons per flush, or less, high efficiency hybrid

81 City of Los Angeles Municipal Code (LAMC), Chapter IX, Article 9.

82 California Building Standards Commission, 2019 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, effective January 1, 2020.

83 CEC, 2019 Building Energy Efficiency Standards, Fact Sheet.

urinals, showerheads with a flow rate of 1.5 gallons per minute or less, and drip irrigation systems to promote reductions in indoor and outdoor water usage; Energy Star–labeled appliances; a 500 kW photovoltaic system; drip irrigation systems; and water-efficient landscape design. In addition, the Project would provide domestic water heating systems located in close proximity to point(s) of use and individual metering and billing for water use. Therefore, the use of electricity during Project operations would not be wasteful, inefficient, or unnecessary.

With regard to supply, LADWP forecasts that its total energy sales in the 2026–2027 fiscal year will be 23,807 gigawatt-hours (GWh) of electricity.[84,85] The Project's electricity demand would represent approximately 0.01 percent of LADWP's projected sales in 2026. LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area.[86] As discussed above, the Project would also incorporate a variety of energy conservation measures to reduce energy usage. Therefore, it is expected that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand. Existing uses to be renovated and newly constructed uses are expected to be more efficient than existing uses as new construction would be required to comply with the most recent Title 24 energy efficiency standards. Accordingly, operation of the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, operational impacts to electricity supply and infrastructure capacity would be less than significant, and no mitigation measures are required.

Natural Gas

As shown in Table 6 on page 91, the Project would consume an estimated 1,019,155 cubic feet of natural gas annually (2,792 cubic feet per day).[87] As discussed above, the Project would comply with requirements of the Los Angeles Green Building Code and CalGreen/Title 24 energy efficiency requirements.[88,89] These measures would require efficient use of natural gas such as high-performance window glazing to reduce natural gas used for heating purposes and high-efficiency water heaters. Therefore, the use of natural gas during Project operations would not be wasteful, inefficient, or unnecessary.

The annual natural gas supply within SoCalGas's service area is estimated to be approximately 2,317 million cubic feet per day (mmcf/day) in 2026.[90] The Project's natural gas demand would represent approximately 0.001 percent of SoCalGas's forecasted natural gas supply in 2026. SoCalGas has

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

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

86 LADWP, Will Serve, 820 South Alameda Street, dated March 3, 2021. Refer to Appendix IS-5 of this IS/MND.

87 Natural gas demand estimate based on estimate provided by the California Emissions Estimator Model (CalEEMod).

88 City of Los Angeles Municipal Code (LAMC), Chapter IX, Article 9.

89 California Building Standards Commission, 2019 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, effective January 1, 2020.

90 California Gas and Electric Utilities, 2020 California Gas Report, p. 111.

confirmed that the Project's natural gas demand can be served by the facilities in the Project area.[91] Therefore, it is anticipated that SoCalGas' existing and planned natural gas supplies would be sufficient to support the Project's demand for natural gas. As such, operation of the Project would not result in an increase in demand for natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Operational impacts to natural gas supply and infrastructure would be less than significant, and no mitigation measures are required.

Transportation Energy

During operation, the Project would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. As summarized in Table 6 on page 91, buildout of the Project would consume approximately 56,870 gallons of gasoline and 9,527 gallons of diesel fuel per year, or a total of 66,398 gallons of petroleum-based fuels per year. As shown in Appendix IS-5 of this IS/MND, transportation fuel usage during Project operations would represent approximately 0.0083 percent of gasoline usage and 0.0075 percent of diesel usage within Los Angeles County. As noted above, the Project Site is located in an urbanized area and in close proximity to several bus routes which would provide employees and visitors with various public transportation opportunities. Furthermore, the Project would be consistent with the vehicle miles travelled (VMT) reduction policies included in SCAG's 2020–2045 RTP/SCS. Specifically, consistent with the 2020–2045 RTP/SCS alignment of transportation, land use, and housing strategies, the Project would provide employees and visitors with convenient access to public transit, which would facilitate a reduction in VMT. As shown in Appendix IS-11.1 of this IS/MND, the Project's internal capture and transportation demand management (TDM) plan would reduce the number of vehicular trips and related VMT by approximately 24 percent. The Project's estimated VMT reductions would be consistent with regional strategies and would be consistent with and support the goals and benefits of the SCAG RTP/SCS, which seeks improved "mobility and access by placing destinations closer together and decreasing the time and cost of traveling between them. Thus, consistent with 2020–2045 RTP/SCS, the Project would reduce VMT, and, consequently, the Project's petroleum-based fuel usage would be reduced. The Project would also comply with the City's EV charging requirements which specifies that 10 percent of new parking spaces would require EV charging equipment. In addition, 30 percent of all new parking spaces would be required to be EV "ready" which will be capable of supporting future EV charging equipment.[92] As such, operational impacts to transportation energy would be less than significant.

Conclusion

Based on the above, operation of the Project would comply with existing applicable energy standards and would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Thus, Project operations would result in less than significant energy resources impacts during operation, and no mitigation measures are required.

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91 SoCalGas, Will Serve—820 S. Alameda St Los Angeles, CA 90021, dated March 9, 2021. Refer to Appendix IS-5 of this IS/MND.

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

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. The energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2019 CALGreen Code, the City of Los Angeles Green Building Code, City of LA Green New Deal and the 2020–2045 RTP/SCS. As these conservation policies are mandatory under the City's Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency. Such requirements of the Title 24, CALGreen and Green Building Code include specific lighting requirements to conserve energy, window glazing to reflect heat, enhanced insulation to reduce heating and ventilation energy usage, and enhanced air filtration. The Project would implement these measures as required by code. The 2019 Title 24 Standards ensure that builders use the most energy efficient and energy conserving technologies and construction practices.

The Project is designed to comply with all applicable state and local codes related to energy, including the City's Green Building Ordinance and the California Green Building Standards Code.[93,94] Design features that would be implemented would include the use of efficient lighting technology; energy efficient heating, ventilation and cooling equipment; and Energy Star rated products and appliances. Electricity provided to the Project Site would be sourced from the LADWP which currently generates a portion of power from renewable resources. The Project would also comply with the City's EV charging requirements.[95] Overall, the Project would be designed and constructed in accordance with applicable state and local green building standards that would serve to reduce the energy demand of the Project. In addition, as discussed above, the demand for electricity during construction and operation of the Project would represent a small fraction of LADWP's projected and planned sales. Similarly, as discussed above, petroleum-based fuels during construction and operations would also represent a fraction of the 2026 projected fuel use in Los Angeles County. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant, and no mitigation measures are required.

93 City of Los Angeles Municipal Code (LAMC), Chapter IX, Article 9

94 California Building Standards Commission, 2019 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, effective January 1, 2020.

95 City of Los Angeles Ordinance No. 186485, www.ladbs.org/docs/default-source/publications/misc-publications/ordinance-186485.pdf?sfvrsn=2.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

The following analysis is based on the *Geologic and Geotechnical Hazards Report for the Proposed 8th & Alameda Studios Project* (Geotechnical Report) prepared for the Project by Group Delta Consultants, Inc., dated March 15, 2021. All specific information regarding geologic and soils conditions in the discussion below is based on the Geotechnical Report. The Geotechnical Report and the LADBS approval letter are included as Appendix IS-6 of this IS/MND. In addition, the analysis associated with paleontological resources is based on records search conducted by the Natural History Museum of Los Angeles County, which is included as Appendix IS-7 of this IS/MND.

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.[96]

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults are those that have ruptured in the last 130,000 years. Inactive faults are those that have not shown evidence of surface displacement within the last 1.6 million years. In addition, there are buried thrust faults, commonly referred to as blind thrust faults, which are faults that are not exposed at the ground surface. While blind thrust faults do not present a potential surface fault rupture hazard, these deep thrust faults are considered active features capable of generating future earthquakes that could result in moderate to significant ground shaking.

The California Geological Survey establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones).[97] These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

According to the Geotechnical Report, the Project Site is situated on top of the northwest trending Elysian Park and Puente Hills blind thrust faults. The lower portion of the Elysian Park blind thrust fault is located approximately 0.6 mile north of the Project Site. The Puente Hills blind thrust fault is located approximately 2.9 miles south of the Project Site. In addition, the closest active fault to the Project Site is the Hollywood fault, which is located approximately 6.3 miles northwest of the Project Site.

Based on the Geotechnical Report and a review of the City's Zone Information and Map Access System (ZIMAS) and General Plan Safety Element, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone or within a City-designated Fault Rupture Study Area.[98,99] Therefore, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site, and the potential for surface rupture at the Project Site is considered low. Furthermore, the proposed

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96 Now the California Geological Survey.

97 The Alquist-Priolo Earthquake Fault Zoning Act and its regulations are presented in California Department of Conservation, California Geological Survey, Special Publication 42, Earthquake Fault Zones.

98 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166-023-010, 5166-023-016, 5166-027-014, and 5166-028-004, http://zimas.lacity.org/, accessed March 11, 2021.

99 City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit A, p. 47.

development would not involve mining operations or deep excavation into the earth, which could create unstable seismic conditions or stresses in the Earth's crust. Therefore, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death related to fault rupture. The Project's impacts related to surface rupture would be less than significant, and no mitigation measures would be required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region, which generally experiences moderate to strong ground shaking in the event of an earthquake on a local or regional fault. However, as noted above, no active faults are known to pass directly beneath the Project Site. In addition, state and local code requirements ensure that buildings are designed and constructed in a manner that, although they may sustain damage during a major earthquake, their risk of collapse is substantially reduced. Specifically, the state and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the City's General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project. Accordingly, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and the application of accepted and proven construction engineering practices. The Los Angeles Building Code incorporates the current seismic design provisions of the 2019 California Building Code, with City amendments, to minimize seismic impacts. The 2019 California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of LADBS, including the recommendations provided in a final, site-specific Geotechnical Report that would be subject to review and approval by LADBS. As discussed in the Geotechnical Report, while the Project Site is subject to strong ground shaking in the event of an earthquake, this hazard is common in Southern California and the effects of ground shaking can be addressed by proper engineering design and construction in conformance with current building codes and engineering practices. Therefore, with implementation of site-specific recommendations and compliance with regulatory requirements, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death related to strong seismic ground shaking. The Project's impacts related to strong seismic ground shaking would be less than significant, and no mitigation measures would be required.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction involves the sudden loss in strength of a saturated, cohesionless soil caused by the build-up of pore water pressure during cyclic loading, such as that produced by an earthquake. This increase in pore water pressure can temporarily transform the soil into a fluid mass, resulting in differential settlement, and can also cause ground deformations. Typically, liquefaction occurs in shallow groundwater areas where there are loose, cohesionless, fine-grained soils. The Project Site is not located within a state-designated Liquefaction Hazard as defined by the California

Geological Survey.[100] In addition, according to the City of Los Angeles and County of Los Angeles, the Project Site is not located in an area that has been identified as potentially susceptible to liquefaction.[101,102] As discussed in the Geotechnical Report, the historical high groundwater level at the Project Site is reported to be deeper than 120 feet. Subsurface soil conditions beneath the Project Site consist of dense to very dense sand with gravel and cobble and are not susceptible to liquefaction or significant seismic settlements. Furthermore, there are no open slopes or waterways nearby that may present the seismic ground failure of lateral spreading. Therefore, the potential for seismic induced ground failure hazards such as liquefaction, seismic settlement, and lateral spreading on-site is considered low. As such, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death related to seismic-related ground failure, including liquefaction. The Project's impacts associated with seismic-related ground failure, including liquefaction, would be less than significant, and no mitigation measures would be required.

iv. Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and characterized by relatively flat topography. In addition, the Project Site is not located in a landslide area as mapped by the State of California or the City of Los Angeles.[103,104,105] Further, the Project does not propose significant cuts or excavations that may create slope instability, and the Project Site would remain flat. As such, the Geotechnical Report considers the potential for landslide hazard at the Project Site to be negligible. Therefore, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. The Project would create no impact and no mitigation measures would be required.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. As discussed in Section 2, Project Description, of this IS/MND, the Project Site is currently fully developed with buildings and surface parking. As such, there are currently no open spaces with exposed topsoil. However, development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils in the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. This potential would be reduced by implementation of standard erosion controls imposed during

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100 California Geological Survey, Earthquake Zones of Required Investigation, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed March 16, 2021.

101 Los Angeles General Plan Safety Element, November 1996, Exhibit B, Areas Susceptible to Liquefaction, p. 49. Sources for Exhibit B also include the Los Angeles City General Plan Framework Element EIR, May 1995; and the County of Los Angeles, General Plan Safety Element Technical Appendix Vol. 2 plate 4 "Liquefaction Susceptibility", January 1990.

102 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166-023-010, 5166-023-016, 5166-027-014, and 5166-028-004, http://zimas.lacity.org/, accessed March 11, 2021.

103 California Geological Survey, Earthquake Zones of Required Investigation, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed March 16, 2021.

104 City of Los Angeles General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, p. 51.

105 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166-023-010, 5166-023-016, 5166-027-014, and 5166-028-004, http://zimas.lacity.org/, accessed March 11, 2021.

site preparation and grading activities. Specifically, all grading activities would require grading permits from the LADBS, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills. Furthermore, during operation, the Project would be required to comply with the City's Low Impact Development (LID) Ordinance (Ordinance No. 183,833) and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. These LID BMPs would include capture and use and/or biofiltration system BMPs as established by the LID Handbook.[106] The installed BMP systems would be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. Therefore, with compliance with applicable regulatory requirements, the Project's potential impacts due to soil erosion or the loss of topsoil would be less than significant, and no mitigation measures would be required.

c. Would the project 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?

Less Than Significant Impact. As discussed above, the Project Site is not located in a landslide area as mapped by the state, nor is the Project Site mapped as a landslide area by the City. The Project Site is not located near slopes or geologic features that would result in, nor would the Project exacerbate, on- or off-site landsliding. As addressed above in Threshold (a)iii and the Geotechnical Report, the Project Site is not located within a state-designated Liquefaction Hazard as defined by the California Geological Survey or within an area that has been identified by the City or County as potentially susceptible to liquefaction. In addition, as discussed above, the potential for seismic-induced ground failure hazards such as liquefaction, seismic settlement, and lateral spreading onsite is considered low.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. No large-scale extraction of groundwater, gas, oil or geothermal energy is occurring or planned at the Project Site or in the general vicinity of the Project Site. In addition, as provided in the Geotechnical Report, the Project Site is not mapped in an active subsidence area as defined by the United States Geological Survey or as mapped by the state, and the Project Site is not located within an active oil field within the City. Therefore, there is minimal to no potential for ground subsidence at the Project Site. Thus, as concluded in the Geotechnical Report, the potential for subsidence is considered low, and impacts related to subsidence would be less than significant.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events. As detailed in the Geotechnical Report, compacted fill soils, typically 5 to 6 feet thick, were placed at the Project Site during previous grading operations. The compacted fill soils were compacted to at least 90 percent of maximum dry density and underlain by dense to very dense sand with gravels and cobbles. The compacted fill soils above the storm drain easement (the bottom of which is about 25 feet below grade) located in the northern portion of the Project Site are underlain by undocumented fill soils. As described in Section 2, Project Description, of this

[106] City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), May 9, 2016.

IS/MND, the Project's proposed parking structure, Building 8, would require excavation to a maximum depth of 55 feet below grade to accommodate footings, and the grip and lighting building, Building 2, would require an excavation depth of 5 feet below grade. As concluded by the Geotechnical Report, the properly compacted fill soils are not considered susceptible to collapse from soil bridging and/or hydro collapse. The footings for Building 8 would be installed in compliance with the current California Building Code and supplemental requirements of the LAMC, as enforced by the City of Los Angeles through the building permit process. These requirements would include building and foundation requirements appropriate to site-specific conditions that would be determined in a design-level geotechnical evaluation for the Project. Therefore, the Project Site is not 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 collapse. Impacts associated with collapsible soils would be less than significant.

Based on the above, the Project would not be located on a geologic unit that is unstable, or that would become unstable as a result of the Project. The Project's potential impacts would be less than significant, and no mitigation measures would be required.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Expansive soils are typically associated with clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. As discussed in the Geotechnical Report, the existing fill soils and upper natural soils were excavated and replaced with properly compacted fill soils. The properly compacted fill soils are not considered susceptible to collapse due to soil bridging and/or hydro collapse. The on-site soils consist predominantly of non-expansive sandy and silty materials. Therefore, the potential of soil expansion is considered negligible. However, if moderately expansive soils are encountered, such soils would be addressed using standard geotechnical design practices (i.e., removal and replacement with non-expansive engineered fill, the use of soil improvement techniques, such as lime treatment, or by obtaining foundation support below the zone of seasonal moisture variation). Furthermore, construction of the Project would be required to comply with the current California Building Code and supplemental requirements of the LAMC, as enforced by the City of Los Angeles through the building permit process. These requirements would include building foundation and other requirements appropriate to site-specific conditions that would be provided in a design-level geotechnical evaluation for the Project as required by the City. In addition, with implementation of the recommendations set forth in the design-level geotechnical evaluation for the Project, as required by the City, the Project would not exacerbate existing environmental conditions that could create substantial risk to life or property due to expansive soils. The Project's potential impacts would be less than significant, and no mitigation measures would be required.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Project Site is located within a community served by existing wastewater infrastructure. Like the existing development at the Project Site, the Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems, and no mitigation measures would be required.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. As the Project Site has previously been graded and developed, surficial paleontological resources that may have existed at one time have likely previously been disturbed. On August 7, 2021, a Project Site-specific paleontological records search was conducted through the Natural History Museum of Los Angeles County to determine the potential impacts of the Project on paleontological resources. The results of the paleontological records search, which are included in Appendix IS-7 of this IS/MND, indicate there are no previously encountered fossil localities located within the Project Site. However, the records search indicates that there are fossil localities nearby from the same sedimentary deposits that occur within the Project Site. The closest identified localities in the broader area of the Project Site include: a fossil specimen of horse (*Equus)* collected at a depth of 43 feet below grade near the intersection of Hill Street and 12th Street; 17 localities of invertebrates within the area bounded by 7th Street, Spring Street, 3rd Street, and Flower Street at depths ranging from 30 to 80 feet below grade; and two localities, including plant material and invertebrate and vertebrate specimens, at an unknown depth near 2nd Street and Spring Street. As described in Section 2, Project Description, of this IS/MND, the Project's proposed parking structure, Building 8, would require a maximum excavation depth of 55 feet below grade to accommodate footings, and the grip and lighting building, Building 2, would require an excavation depth of 5 feet below grade. Thus, the possibility exists that paleontological artifacts that were not discovered during prior construction or other human activity may be present within the Project Site. The City has established a standard condition of approval to address inadvertent discovery of paleontological resources. Should paleontological resources be inadvertently encountered, the City's condition of approval provides for temporarily halting construction activities near the encounter and retaining a qualified paleontologist to assess the find and, if necessary, developing a plan for removal and treatment of the find. Overall, with adherence to the City's condition of approval, the Project would not directly or indirectly destroy a unique paleontological resource, should one be unexpectedly encountered during excavation. The Project's potential impacts would be less than significant, and no mitigation measures would be required.

With regard to a unique geologic feature, the Project Site is currently developed with the Plant, vehicular maintenance building, supportive ancillary structures and surface parking and there are no unique geologic features on the Project Site. Therefore, the Project would not directly or indirectly destroy a unique geologic feature at the Project Site. No impacts would occur, and no mitigation measures are required.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

As noted above, CEQA Guidelines Section 15064.4 does not establish a threshold of significance; instead, lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officer's Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence.[107] The CEQA Guidelines Amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analyses.[108]

Less Than Significant Impact. The Project would generate an incremental contribution to GHG emissions. CEQA Guidelines Section 15064.4 does not establish a threshold of significance; instead, lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officer's Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence.[109] The CEQA Guidelines Amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analyses.[110]

Section 15064.4 of the CEQA guidelines gives lead agencies the discretion to determine whether to assess a project's emissions quantitatively or qualitatively. This regulation recommends considering

[107] CEQA Guidelines Section 15064.7(c).

[108] CEQA Guidelines Section 15130 (f).

[109] CEQA Guidelines Section 15064.7(c).

[110] CEQA Guidelines Section 15130 (f).

certain factors, among others, when determining the significance of project's GHG emissions, including the extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs. However, Section 15064.4 does not establish a threshold of significance. Moreover, neither the State, SCAQMD, nor the City of Los Angeles City has adopted any numeric threshold for GHG emissions. The California Natural Resources Agency has also clarified that the effects of GHG emissions are cumulative impacts, and that they should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see Section 15064(h)(3)).[111] Further, the Governor's Office of Planning and Research's (OPR) technical advisory on CEQA and climate change, the Natural Resources Agency's Final Statement of Reasons, and CEQA Guidelines Section 15064.4 provide that a qualitative analysis of project-level impacts to determine whether a project's GHG impacts are significant can be based on a project's consistency with previously approved plans and mitigation programs, as long as such plans have adequately analyzed and mitigated GHG emissions to a less than significant level.[112]

Therefore, the quantification of the Project's GHG emissions is being done for informational purposes, only, and Project GHG emissions are not evaluated against any numeric threshold;, instead, Project GHG emissions are considered consistent with CEQA Guidelines Section 15064.4(b) in the context of whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2020–2045 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers consistency with regulations or requirements set forth by AB 32's 2008 Climate Change Scoping Plan and subsequent updates, and the City of Los Angeles Sustainable City pLAn/Green New Deal.

Finally, the Project's operational GHG emissions inventory is assessed based on the incremental increase in emissions compared to baseline (existing) conditions. Therefore, the calculation of the Project's operational GHG emissions would subtract the existing emissions of the current use to determine the incremental increase. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

Construction

GHG emissions from construction activities were forecasted using a reasonable estimate of a construction schedule and phasing and applying published GHG emission factors. Construction emissions were calculated using the CalEEMod model. The output values used in this analysis were adjusted to be Project-specific, based on the same equipment usage rates, type of fuel, and construction schedule that were used for the Air Quality analyses. These values were then applied to the same construction phasing

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[111] See generally California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, December 2009, pp. 11–13, 14, 16; see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, April 13, 2009, www.opr.ca.gov/docs/Transmittal_Letter.pdf, accessed May 1, 2017.

[112] Governor's Office of Planning and Research, Technical Advisory—CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, 2008; California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, December 2009, p. 22–26.

assumptions as were used in the criteria pollutant analysis to generate GHG emissions values for each construction year (refer to Appendix IS-1 of this IS/MND for a detailed analysis).

As presented in Table 7 on page 105, construction of the Project is estimated to generate a total of 6,984 metric tons of GHGs measured as an equivalent mass of carbon dioxide ($MTCO_2e$) over the estimated 34 months of construction (approximately three years).[113] As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emission estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.[114]

A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions provided used in this analysis is included within the emissions calculation worksheets that are provided in Appendix IS-1 of this IS/MND.

Operation

The Project would result in direct and indirect GHG emissions generated by the increase in vehicular trips as compared to the existing uses at the Project Site, as well as difference in operations associated with the Project buildings, including: (1) building operations: emissions associated with space heating and cooling, water heating, and lighting; (2) water: emissions associated with energy used to pump, convey, treat, deliver, and re-treat water; and (3) solid waste: emissions associated with waste streams (embodied energy of materials). The Project would comply with the requirements of Title 24, CalGreen Building Code, the City's Green New Deal and the Los Angeles Green Building Code, which would serve to reduce GHG emissions.

Operational emissions from the sources described above were estimated using CalEEMod for the Project in order to determine the net incremental change in GHG emissions. Calculation of the Project's operational emissions are the difference in emissions from Buildout land uses and Existing land uses for the Buildout year (2026). Mobile source emissions are based on the vehicle emission factors from EMFAC and the Project's daily VMT provided as discussed in Section XVII, Transportation and in the Transportation Assessment included as Appendix IS-11.1 of this IS/MND. The Project's daily VMT was calculated using the LADOT VMT Calculator (Appendix B of the Transportation Assessment). As shown in Table 8 on page 106, the Project without Project Design Features assumes compliance with Title 24 and the Los Angeles Green Building Code which results in a net increase of 2,695 $MTCO_2e$ annually.

Also shown in Table 8, the Project with Project Design Features takes into account VMT reduction features such as proximity to transit, job centers and high density development, and energy reduction

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[113] Construction assumptions are contained in Appendix IS-1 of this IS/MND, Construction Schedule and Equipment Requirements, and were obtained from DPR Construction. Construction emissions conservatively do not account for the offsetting emissions from decommissioning of existing operational uses during construction. All construction emissions are considered new emissions.

[114] SCAQMD, Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008, www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2.

Table 7
Construction-Related GHG Emissions
($MTCO_2e$)

Year	$MTCO_2e$[a]
2023	1,912
2024	2,695
2025	2,116
2026	260
Total	6,984
Amortized Over 30 Years[b]	**233**

$MTCO_2e$ = metric tons of an equivalent mass of carbon dioxide

[a] *CO2e was calculated using CalEEMod and the results are provided in Section 2.0 of the Construction CalEEMod output file within Appendix IS-1 of this IS/MND.*

[b] *As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.*

Source: Eyestone Environmental, 2021.

features such as use of LED lighting and solar panels (i.e., 500 kW photovoltaic system on the northeast corner of Building 1); high efficiency dual-flush toilets with a flush volume of 1.28/1.1 gallons per flush, or less, high efficiency hybrid urinals, showerheads with a flow rate of 1.5 gallons per minute or less, and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star–labeled appliances; and water-efficient landscape design as well as compliance with Title 24 and Green Building code requirements. In addition, the Project would provide domestic water heating systems located in close proximity to point(s) of use and individual metering and billing for water use. As a result, the Project with Project Design Features would result in a net increase of 1,307 $MTCO_2e$ annually. Thus, the Project Design Features result in a reduction of approximately 1,388 $MTCO_2e$ annually.

Consistency with Applicable Plans and Policies

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 commits the State to the following:

- By 2010, reduce to 2000 emission levels;
- By 2020, reduce to 1990 levels; and
- By 2050, reduce to 80 percent below 1990 levels.

AB 32 requires that CARB determine what the statewide GHG emissions level was in 1990 and approve a statewide GHG emissions limit that is equivalent to that level, to be achieved by 2020. Executive Order (EO) B-30-15, which was issued in April 2015 by Governor Brown, requires statewide requires GHG emissions to be reduced 40 percent below 1990 levels by 2030. SB 32, signed into law in September

Table 8
Operational Greenhouse Gas Emissions (Net Increase)

Emission Source	Project Without Project Design Features CO_2e (metric tons)[a]	Project With Project Design Features CO_2e (metric tons)[a]
Area[b]	<1	<1
Energy[c]	1,028	761
Mobile	1,471	574
EV Chargers and Solar Panels	(191)	(415)
Stationary[d]	7	7
Solid Waste[e]	40	40
Water/Wastewater[f]	107	107
Construction	233	233
Total Emissions	**2,695**	**1,307**

[a] *CO_2e was calculated using CalEEMod and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix IS-1 of this IS/MND.*

[b] *Area source emissions are from landscaping equipment.*

[c] *Energy source emissions are based on CalEEMod default electricity and natural gas usage rates.*

[d] *Stationary source emissions are from an on-site emergency generator.*

[e] *Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.*

[f] *Water/wastewater emissions are calculated based on CalEEMod default water consumption rates.*

Source: Eyestone Environmental, 2021.

2016, codifies the 2030 GHG reduction target in EO B-30-15. Also, pursuant to AB 32, CARB must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.[115]

To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide Greenhouse Gas (GHG) emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

CARB approved a Climate Change Scoping Plan (2008 Scoping Plan) required by AB 32 in 2008.[116] The 2008 Scoping Plan proposes a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health."[117] The First Update to the AB 32 Scoping Plan (First Update), released on May 22, 2014, found that California was on track to meet the

[115] California Air Resources Board. AB 32 Global Warming Solutions Act of 2006. ww2.arb.ca.gov/resources/fact-sheets/ab-32-global-warming-solutions-act-2006, accessed August 15, 2021.

[116] Climate Change Proposed Scoping Plan was approved by the California Air Resources Board on December 11, 2008.

[117] Climate Change Scoping Plan, CARB, December 2008, www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm, last reviewed April 3, 2013.

2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.[118]

In December 2017, CARB adopted the *2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target* (2017 Update).[119] The 2017 Update builds upon the successful framework established by the 2008 Scoping Plan and the First Update while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The 2017 Update includes policies to require direct GHG reductions at some of the state's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade Program, which constraints and reduces emissions at covered sources.[120]

The California Attorney General's Office has taken an active role in addressing climate change in CEQA documents. The Attorney General's Office has created and routinely updates a Fact Sheet listing project design features to reduce greenhouse gas emissions.[121] The Attorney General's Office created the Fact Sheet primarily for the benefit of local agencies processing CEQA documents, noting that "local agencies will help to move the State away from 'business-as-usual' and toward a low-carbon future."[122] The Fact Sheet explains that the listed "measures can be included as design features of a project," but emphasizes that they "should not be considered in isolation, but as part of a larger set of measures that, working together, will reduce greenhouse gas emissions and the effects of global warming."[123]

The Governor's Office of Planning and Research (OPR) recommended Amendments to the CEQA Guidelines for GHGs which were adopted on December 30, 2009. CEQA Guidelines Section 15064.4 was adopted to assist lead agencies in determining the significance of the impacts of GHGs. Consistent with the developing practice, this section of the CEQA Guidelines urges lead agencies to quantify GHG emissions of projects where possible, but also indicates that a that a full "life-cycle" analysis is not required. In addition to quantification, CEQA Guidelines Section 15064.4 recommends consideration of several other qualitative factors that may be used in the determination of significance (i.e., the extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to reduce or mitigate GHGs).

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118 CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014, p. 34.

119 CARB, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf?utm_medium=email&utm_source=govdelivery.

120 CARB, 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, p. 6.

121 California Attorney General's Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the Local Agency Level, revised January 6, 2010.

122 California Attorney General's Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the Local Agency Level, revised January 6, 2010, http://understandtheplan.info/wp-content/uploads/2014/08/GW_mitigation_measures.pdf.

123 California Attorney General's Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the Local Agency Level, revised January 6, 2010, http://understandtheplan.info/wp-content/uploads/2014/08/GW_mitigation_measures.pdf.

Lead agencies must either establish significance thresholds for their respective jurisdictions or determine significance on a case-by-case basis. The lead agency should use its "careful judgment" in making a determination of significance, and should make a "good-faith" effort to "describe, calculate or estimate" the amount of GHGs that will result from a project.[124,125] The lead agency is given the discretion to select a reasonable model and methodology to quantify GHGs and to rely on a qualitative analysis or performance based standards for its determination.[126] A lead agency should also consider the following factors, among others, when assessing the significance of impacts from GHGs: (1) the extent to which the project may increase or reduce GHGs; (2) whether the GHG emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, local plan for the reduction or mitigation of GHG emissions.[127]

CEQA Guidelines Section 15064 provides that a determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of GHG emissions.

As discussed above, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City of Los Angeles. Although state, regional, and local plans and policies have been adopted to help address climate change (see discussions above), no current law or regulation would regulate all aspects of the Project's GHG emissions. In the absence of any adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

As discussed above, a significant impact would occur if the Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment by conflicting with applicable regulatory plans and policies to reduce GHG emissions as discussed within CARB's Scoping Plan and subsequent updates, SCAG's 2020–2045 RTP/SCS, and the City's Green New Deal. The analysis below describes the extent to which the Project complies with or exceeds the performance-based standards included in the regulations outlined in these plans. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

CARB's 2008 Climate Change Scoping Plan and Subsequent Updates

The Scoping Plan includes a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a Cap-and-Trade system, and an AB 32 implementation fee to fund the program. The following discussion demonstrates how the pertinent reduction actions relate to and reduce Project-related GHG emissions.

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[124] CEQA Guidelines Section 15064.4(a).

[125] CEQA Guidelines Section 15064.4(a).

[126] CEQA Guidelines Section 15064.4(a)(1)-(2).

[127] CEQA Guidelines Section 15064.4(b).

Regulatory Framework

The following applicable mandatory reduction actions/strategies would serve to indirectly reduce Project GHG emissions:

- **RPS Program and SB 2X:** The California RPS program (Updated under Senate Bill (SB) 2X) requires both public and investor-owned utilities in California to receive at least 33 percent of their electricity from renewable sources by the year 2020. SB 350 further requires 50 percent renewables by 2030. In 2020, LADWP indicated that 34 percent of its electricity came from renewable resources in Year 2019. The CalEEMod default carbon intensity for electricity generated by LADWP (pounds of CO2e per MWh) is based on a year 2007 renewables portfolio of 8 percent and was therefore updated within CalEEMod to reflect the year 2026 renewables portfolio. Please note that under recently passed SB 100, LADWP is required to generate electricity that would increase renewable energy resources to 50 percent by 2026, 60 percent by 2030, and 100 percent by 2045. The Project complies with these percentage renewable requirements because the Project is served by LADWP. Electricity GHG emissions provided above in Table 8 on page 106 conservatively do not account for the additional 50-percent reduction that would be achieved by LADWP in year 2045 (difference between the 50 percent renewables assumed for the buildout year of 2026 and 100 percent required under SB 2X in year 2045). Given LADWP's demonstrated progress towards meeting and exceeding the established targets, as well as potential penalties for non-compliance, it is reasonably assumed that LADWP will comply.

- **SB 350:** As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 (discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation. The Project would further support this action/strategy because it includes energy-efficient light-emitting diode (LED) lighting as well as Energy Star–labeled appliances for the Project

- **Cap-and-Trade Program:** The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, this regulatory program applies to electric service providers and not directly to the Project. That being said, while not quantified in this analysis, the Project would benefit from this regulatory program in that the GHG emissions associated with the Project's electricity usage per year presented in Table 8 on page 106 would indirectly be covered by the Cap-and-Trade Program.

- **Advanced Clean Cars Program:** CARB approved the Advanced Clean Cars Program in 2012 which establishes an emissions control program for model years 2017 through 2025 and increases the number of zero emission vehicles manufactured in the 2018 through 2025 model years.[128] Standards under the Advanced Clean Cars Program apply to all passenger vehicles and light duty trucks within California and indirectly used by employees and deliveries to the Project. Since the CalEEMod model default fleet mix for the Air Basin does not yet account for this regulation, the Project's mobile source GHG emissions provided in Table 8 on page 106 are conservative because they could not be adjusted to include this additional 34-percent reduction, even though the Project's emissions would be reduced as a result of this Program. The Project would support this regulation since the Project would comply with the

[128] CARB, Advanced Clean Cars Program, ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about, accessed August 10, 2021.

City's EV charging requirements, which specify that 10 percent of new parking spaces would require EV charging equipment.[129] The Project would further support this regulation since the Applicant would provide at least 30 percent of the total parking spaces provided to be capable of supporting future EVSE as dictated.

- **Low Carbon Fuel Standard (LCFS)**: The current LCFS requires a reduction of at least 8.75 percent in the carbon intensity (CI) of California's transportation fuels by 2021.[130] CalEEMod includes implementation of LCFS into the calculation of GHG emissions from mobile sources. However, the LCFS was amended in September 2018 to target a 20-percent reduction in CI from a 2010 baseline by 2030. As discussed previously, the CalEEMod model does not take into account the more recent updates to LCFS. The Project's emissions inventory conservatively does not take credit for additional GHG reductions due to the more recent LCFS requirements, but this additional 10-percent reduction in CI would indirectly reduce the Project's mobile source emissions.

- **California Integrated Waste Management Act of 1989:** The regulation requires each jurisdiction's source reduction and recycling element to include a diversion of 50 percent of all solid waste by 2000.[131] AB 341 (2011) amended the regulation to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter.[132] The Project would comply with these percentage recycling requirements inasmuch as the Project is served by the City of Los Angeles, which currently achieves a diversion rate of 76 percent.[133] Project-related GHG emissions from solid waste generation provided in Table 8 on page 106 includes a 76-percent reduction in solid waste generation source emissions consistent with the minimum diversion rate required for the City of Los Angeles (CalEEMod default diversion rate is zero percent). The Applicant must also only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341.[134] In addition, the Project would provide recycling bins at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. Consistent with CalGreen requirements, the Project would recycle and/or salvage at least 65 percent of non-hazardous construction and demolition debris, and the Applicant would prepare a construction waste management plan that, at a minimum, identifies the materials to be diverted from disposal and whether the materials would be sorted on-site or comingled.[135]

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129 City of Los Angeles, Ordinance No. 186485, www.ladbs.org/docs/default-source/publications/misc-publications/ordinance-186485.pdf?sfvrsn=2.

130 California Air Resources Board, Data Dashboard, ww3.arb.ca.gov/fuels/lcfs/dashboard/dashboard.htm, accessed August 9, 2021.

131 California Legislative Information, State of California Public Resources Code Section 41780, https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=41780, accessed August 9, 2021.

132 California Legislative Information, Assembly Bill No. 341, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201120120AB341, accessed August 9, 2021.

133 City of Los Angeles Zero Waste Progress Report, March 2013.

134 CalRecycle, Mandatory Commercial Recycling, www.calrecycle.ca.gov/recycle/commercial, accessed August 9, 2021.

135 CalRecycle, CALGreen Construction Waste Management Requirements, www.calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/newstructures, accessed August 9, 2021.

Applicable Scoping Plan Measures

Further evaluation of project design features and specific applicable polices and measures in the Scoping Plan is provided below. As shown below, the Project would not conflict with the policies included in the Scoping Plan.

- **CCR, Title 24, Building Standards Code:** The 2019 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy. The Project would not conflict with the regulatory requirements as the Project must comply with applicable provisions of the 2020 Los Angeles Green Code that in turn require compliance with mandatory standards included in the California Green Building Standards such as automatic lighting controls, electric vehicle charging requirements and reduced flow rate of plumbing fixtures to conserve water.[136,137] The Project would further support this regulation since the Project would incorporate energy-efficient LED lighting throughout the Project, reducing overall energy usage compared to baseline conditions. In addition, lighting and energy usage for new structures would comply with Title 24 standards.

Senate Bill (SB) 375: SB 375 requires integration of planning processes for transportation, land-use and housing. Under SB 375, each Metropolitan Planning Organization (MPO) would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target, created by CARB, for reducing GHG emissions. The Project represents an infill development within an existing urbanized area that would introduce new employment, within an HQTA, consistent with the overall growth pattern encouraged in the RTP/SCS.[138] The Project Site is also well served by public transportation and the Project provides the required short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC. These and other measures would further promote a reduction in VMT and subsequent reduction in GHG emissions. Therefore, the Project would be consistent with SB 375 and the reduction in passenger vehicle GHG emissions provided in the 2016–2040 RTP/SCS. Furthermore, as shown in Appendix IS-1, incorporation of USEPA MXD VMT reduction features applicable to the Project results in a 24-percent reduction in overall VMT in comparison to a Project without these reduction features. This reduction in Project-related VMT would support the goal of the 2020–2045 RTP/SCS to reduce GHG emissions from passenger vehicles.

- **Senate Bill X7-7:** The Water Conservation Act of 2009 set an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state was required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. This senate bill was an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy and the associated emissions necessary to convey, treat, and distribute the water; it

136 City of Los Angeles Municipal Code (LAMC), Chapter IX, Article 9.

137 California Building Standards Commission, 2019 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, effective January 1, 2020.

138 SCAG 2020–2045 RTP/SCS. Exhibit 2.8 Priority Growth Area—High Quality Transit Areas.

also reduces emissions from wastewater treatment. The Project would comply with the City of Los Angeles Green Building Code which requires a 20 percent reduction in water usage.[139]

SCAG 2020–2045 RTP/SCS

The purpose of SB 375 is to implement the State's GHG emissions reduction goals by integrating land use planning with the goal of reducing car and light-duty truck travel. Reflecting that purpose, the primary goal of the 2020–2045 RTP/SCS is to provide a framework for future growth that will decrease per capita GHG emissions from cars and light-duty trucks based on land use planning and transportation options.[140] To accomplish this goal, the 2020–2045 RTP/SCS identifies various strategies to reduce per capita VMT. The 2020–2045 RTP/SCS is expected to help SCAG reach its GHG reduction goals, as identified by CARB, with reductions in per capita passenger vehicle GHG emissions for specified target years.[141]

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands.[142] Thus, successful implementation of the 2020–2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. With regard to individual developments, such as the Project, strategies and policies set forth in the 2020–2045 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved energy efficiency.[143] These strategies and policies are addressed below. Also, as explained immediately below, the Project is consistent with applicable growth forecasts.

Consistency with Integrated Growth Forecast

The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review.[144] As discussed in Response to Checklist Question XIV.a, Population and Housing, below, the Project is consistent with the regional growth projections for the Los Angeles Subregion.

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139 City of Los Angeles Municipal Code (LAMC), Section 99.04.303.

140 SCAG, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176

141 SCAG, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176

142 SCAG, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176

143 SCAG, Draft Program EIR for the 2020–2045 RTP/SC, Section 3.8, Greenhouses, December 2019, p. 3.8-61.

144 SCAG, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.

Consistency with VMT Reduction Strategies and Policies

The Project is designed and would be constructed to incorporate features to support and promote environmental sustainability. The Project represents an infill development within an existing urbanized area that is well served by public transportation and located adjacent to several Metro bus stops. As discussed in Response to Checklist XVII.A, Transportation, below, the Project is estimated to generate lower VMT per employee for employees than the average for the area. Additionally, the Project incorporates several TDM measures (e.g., provide required short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC) to reduce the number of single occupancy vehicle trips to the Project Site. Trip generation and VMT were calculated using the LADOT VMT Calculator which accounts for project features such as increased density and proximity to transit. As shown in Appendix IS-1, incorporation of reduction features applicable to the Project results in a 24-percent reduction in overall VMT and resultant GHG emissions, which is consistent with the GHG reduction strategies provided in the 2020–2045 RTP/SCS. The Project would also be consistent with the following key GHG reduction strategies in SCAG's 2020–2045 RTP/SCS, which are based on changing the region's land use and travel patterns:[145]

- New housing and job growth focused in High Quality Transit Areas (HQTAs);
- Limit total acreage of greenfield or otherwise rural land uses converted to urban use; and
- Reduce VMT per capita.

As discussed above, the Project represents an infill development within an existing urbanized area that would introduce new employment, within an HQTA which is well served by public transportation.[146] Furthermore, the Project VMT per capita would be well below the APC average designated for Project area. The Project would also provide required short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC. These and other measures would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2020–2045 RTP/SCS.

Increased Use of Alternative Fueled Vehicles Policy Initiative

The second goal of the 2020–2045 RTP/SCS, with regard to individual development projects, such as the Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions.[147] The 2020–2045 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies.[148] The Project would provide at least 30 percent of the total LAMC-required parking spaces provided to be capable of supporting future EVSE and at least 10 percent of the total LAMC-required parking spaces with EV charging stations as dictated by City requirements.

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145 SCAG 2020–2045 RTP/SCS, Table 5.1, Connect SoCal Performance Measures and Results.

146 SCAG 2020–2045 RTP/SCS, Exhibit 2.8, Priority Growth Area—High Quality Transit Areas.

147 SCAG, 2020–2045 RTP/SCS, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.

148 SCAG, 2020–2045 RTP/SCS, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.

Energy Efficiency Strategies and Policies

The third important goal within the 2020–2045 RTP/SCS for individual developments, such as the Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions.[149] The 2020–2045 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where possible.[150] As discussed above, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen Code.[151,152] These standards would reduce energy and water usage and waste and, thereby, reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but not limited to; high efficiency dual-flush toilets with a flush volume of 1.28/1.1 gallons per flush, or less, high efficiency hybrid urinals, showerheads with a flow rate of 1.5 gallons per minute or less, and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star–labeled appliances; 500 kW photovoltaic system; and water-efficient landscape design. Furthermore, the Project would provide domestic water heating systems located in close proximity to point(s) of use and individual metering and billing for water use. In addition, the Project would be subject to the 2019 Title 24 standards, which represent "challenging but achievable design and construction practices" that represent "a major step towards meeting the Zero Net Energy (ZNE) goal." Nonresidential buildings built with the 2019 Title 24 standards will use about 30 percent less energy due mainly to lighting upgrades.[153]

Land Use Assumptions

At the regional level, the 2020–2045 RTP/SCS is a plan adopted for the purpose of reducing GHGs.[154] In order to assess the Project's consistency with the 2020–2045 RTP/SCS, this MND also analyzes the Project's land use characteristics for consistency with those utilized by SCAG in its SCS. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as the 2020–2045 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. As discussed in Response to Checklist Question XI.b, Land Use and Planning, below, the Project is consistent with the land use goals and principles set forth in the 2020–2045 RTP/SCS that pertain to GHG emissions.

In sum, the Project is the type of land use development that is encouraged by the 2020–2045 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG

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149 SCAG, 2020–2045 RTP/SCS, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.

150 SCAG, 2020–2045 RTP/SCS, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.

151 City of Los Angeles Municipal Code (LAMC), Chapter IX, Article 9.

152 California Building Standards Commission, 2019 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, effective January 1, 2020.

153 CEC, 2019 Building Energy Efficiency Standards, Fact Sheet.

154 As part of the state's mandate to reduce per-capita GHG emissions from automobiles and light trucks, the 2020–2045 RTP/SCS presents strategies and tools that are consistent with local jurisdictions' land use policies and incorporates practices to achieve the state-mandated reductions in GHG emissions at the regional level through reduced per-capita vehicle miles traveled. SCAG 2020–2045 RTP/SCS, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.

reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term climate policies.[155] By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with State regulatory requirements.

City of Los Angeles Green New Deal

L.A.'s Green New Deal, a mayoral initiative, includes both short-term and long-term aspirations through the year 2050 in various topic areas, including: water, renewable energy, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. While not a plan adopted solely to reduce GHG emissions, within L.A.'s Green New Deal, climate change mitigation is one of eight explicit benefits that help define its strategies and goals.

Although L.A.'s Green New Deal mainly targets GHG emissions related to City-owned buildings and operations, certain reductions associated with the Project would promote its goals. Such measures include increasing renewable energy usage, reduction of per capita water usage, promotion of walking and biking to work, promotion of high density housing close to major transportation stops, and various recycling and trash diversion goals. The Project would generally be consistent with these goals because it is an infill development within an existing urbanized area that would introduce employment within an HQTA which is well served by public transportation. Furthermore, the Project would comply with CALGreen Code, implement various project design features to reduce energy usage and would comply with the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the targets included in L.A.'s Green New Deal with regard to energy-efficient buildings and waste and landfills. The Project would also provide secure short- and long-term bicycle storage areas, showers and changing areas for Project employees and visitors. Project design would also provide pedestrian access that minimizes barriers and links the Project Site with existing or planned external streets to encourage people to walk instead of drive.

Conclusion

In conclusion, the Project would be consistent with the CARB's Scoping Plan, SCAG's 2020–2045 RTP/SCS and the City's Green New Deal and, therefore, would neither generate GHG emissions that may have a significant impact on the environment nor conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Specifically, the Project would not conflict with the emission reduction measures discussed within CARB's Scoping Plan and subsequent updates, particularly their emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's Scoping Plan and updates, the Project would use "green building" features consistent with the CalGreen Building Code. As discussed above, the Project would generate only a small number of new vehicle trips that would not result in any VMT impacts and would also not conflict with SCAG's 2020–2045 RTP/SCS. Furthermore, as detailed above, the Project would use LED lighting to minimize use of electricity; high efficiency dual-flush toilets with a flush volume of 1.28/1.1 gallons per flush, or less, high efficiency hybrid urinals, showerheads with a flow rate of

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

1.5 gallons per minute or less, and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star–labeled appliances; 500 kW photovoltaic system; use native and drought-tolerant plant species in the landscaping to minimize water use and would retain existing EV ready and EV-charging stations to assist in the reduction of GHG emissions from vehicles. In addition, the Project would provide domestic water heating systems located in close proximity to point(s) of use and individual metering and billing for water use. As such, the Project would comply with L.A.'s Green New Deal. Also, shown in Table 8 on page 106, the Project with implementation of Project Design Features would result in a reduction of GHG emissions in comparison to a Project without Project Design Features. The reduction in emissions takes into account measures which comply with the CARB's Scoping Plan and SCAG's 2020–2045 RTP/SCS. In the absence of adopted standards and established significance thresholds, and given this consistency analysis, it is concluded that the Project's impacts related to GHG emissions would be less than significant, and no mitigation measures are required.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

The following analysis is based, in part, on the following documents prepared for the Project by California Environmental: *Phase I Environmental Site Assessment for Industrial Property—LA Times Printing Facility, 2000 East 8th Street* (Phase I ESA) dated June 2019; *Updated Soil Gas Testing, Industrial Property—LA Times Printing Facility* (Soil Gas Report) dated May 2021; and Addendum to the Phase I ESA dated August 12, 2021. All specific information regarding historic and existing on-site conditions in the discussion below is from these reports unless otherwise noted. The reports are included as Appendix IS-8 of this IS/MND.

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact.

Construction

Typical of construction activities for development projects, during demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners would be routinely used on the Project Site. However, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including, but not limited to the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, Federal and State Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by LADBS. These existing regulations are aimed at the amount of hazardous materials used, accident prevention, protection from exposure to specific chemicals, and the proper storage and disposal of hazardous materials. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Accordingly, Project construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials during construction. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant, and no mitigation measures would be required.

Operation

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. Studio uses, in particular, would involve the use of hazardous materials such as paints, adhesives, aerosol spray paint, as well as other materials for production and set making.

Such use would be consistent with that currently occurring at other commercial and studio developments. However, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with manufacturer's standards and all applicable federal, state, and local requirements, such as California Hazardous Waste Control Law, Federal and California Occupational Safety and Health Acts, the Emergency Planning and Community Right-to-Know Act (Superfund Amendments and Reauthorization Act, Title III), and Safe Drinking Water and Toxic Enforcement Act, and Uniform Fire Code. Therefore, with compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant, and no mitigation measures would be required.

b. Would the project 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?

Less Than Significant Impact with Mitigation Incorporated. The current and past land uses within the Project Site were identified as part of the Phase I ESA to assess their potential to present concerns relative to the presence of hazards within the Project Site. These concerns are classified as Recognized Environmental Conditions (RECs), which are defined in Section 1.1.1 of the American Society for Testing and Materials (ASTM) Standard Practice as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.

As detailed in the Phase I ESA, included in Appendix IS-8.1 of this IS/MND, the Project Site was developed with multiple dwellings in 1900 with a lumber yard present on the western portion of the property in 1906. The Project Site was then redeveloped with a rail yard from 1923 through at least 1977. The Project Site was again redeveloped with its current configuration by 1989 where it has been occupied by the Los Angeles Times for printing and distribution of newspapers/magazines.

An analysis of the potential risk of upset conditions involving the release of hazardous materials associated with the historic, existing, and proposed use of the Project Site is provided below.

Underground and Aboveground Storage Tanks

According to the Phase I ESA, four underground storage tanks (USTs) were removed from the property in 2002 and 2003. Specifically, three 12,000 gallon diesel USTs were removed from beneath the fueling island area and one 1,000 gallon waste oil UST was removed from the west side of the vehicle maintenance facility.

Chemical analyses showed no petroleum hydrocarbons in any of the samples collected beneath the former diesel USTs (i.e., the results were "non-detect", or below detection limits). However, a low concentration of total petroleum hydrocarbons as gasoline (TPH-g) (1.8 mg/kg) was detected near the southern diesel dispenser. Total petroleum hydrocarbons as diesel (TPH-d) were detected beneath all three diesel dispensers at concentrations ranging from 676 mg/kg to 3,483 mg/kg. After a subsequent

assessment consisting of 8 borings determined the release was limited in extent an, LAFD issued a No Further Action letter for the removal of the three diesel USTs in 2003.

Soil sampling performed during removal of the waste oil tank in 2003 revealed elevated concentrations of TPH oil along the remote fills and along the piping runs. Laboratory analyses showed no TPH-gas, BTEX, or fuel oxygenates in any of the soil samples (i.e., the results were "non-detect"). Concentrations of total recoverable petroleum hydrocarbons (TRPH) ranging up to 5,050 mg/kg were detected in product piping samples. TPH carbon chain analysis indicated that hydrocarbons were present in the heavy-oil range (C23-C40) with detected concentrations ranging from 965 mg/kg to 4,518 mg/kg. Based on the analytical results, Encon requested tank closure be granted by the LAFD. LAFD referred the case to the Los Angeles Regional Water Quality Control Board (LARWQCB) in December 2016. Based on its review of information relating to the waste oil UST, the LARWQCB issued a No Further Requirements letter dated March 27, 2017, for the oil release stating, "…staff has determined that the residual concentrations of fuel constituents in the soil beneath the site pose minimal threat to human health and the environment. Therefore, no further soil and/or groundwater investigation are required at the Site."

The presence of petroleum impacted soil associated with the historical USTs removed from the site and the remedial excavation areas, which have all received written regulatory closure from the applicable governmental agencies, are considered Historical Recognized Environmental Condition (HRECS) in connection with the subject property. As concluded in the Phase I ESA, no further action or investigation is recommended regarding the HRECs.

Currently there are two 15,000-gallon diesel USTs located beneath the southeast corner of the Project Site as a fuel source for the emergency generator system. As evaluated in the Phase I ESA, these double-wall USTs are in compliance with the current applicable UST construction and monitoring requirements and would remain on the property as part of the Project's existing setting, but not part of the Project. The two diesel USTs would remain in their existing location, and the Project would not involve any construction in or immediately near the USTs.

At the time of site reconnaissance in 2019, the southeast corner of Project Site also includes one empty 500-gallon above-ground storage tank (AST) that previously held ammonia near the emergency generator structure. One 100-gallon propane AST is located under the former fueling area canopy and several 1,000 gallons ASTs used for oil are located at the north end of the maintenance buildings. Six 7,000-gallon ASTs used for ink storage for existing site operations are also reportedly located on-site. The Phase I ESA identified no evidence of leaks or releases associated with the ASTs, or any significant staining in the vicinity of the ASTs and recommends no further investigation regarding this issue.

Based on the above, the Project would not exacerbate hazardous conditions related to risk of upset and accident conditions associated with USTs or ASTs.

Asbestos-Containing Materials

Asbestos is a naturally occurring mineral made up of microscopic fibers. Asbestos has unique qualities that include its strength, fire resistance, resistance to chemical corrosion, poor conduction of heat, noise, and electricity, and low cost. Asbestos was widely used in the building industry starting in the late 1800s and up until the late 1970s for a variety of uses, including acoustic and thermal insulation and fireproofing, and is often found in ceiling and floor tiles, linoleum, pipes, structural beams, and asphalt. Thus, a

building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos or Asbestos Containing Materials (ACMs). Despite its useful qualities, asbestos becomes a hazard if the fibers separate and become airborne. Inhalation of airborne asbestos fibers could cause lung diseases.

As described in the Phase I ESA, suspect ACM was observed in the form of floor tiles, linoleum, ceiling tiles, joint compound, and wallboard. Due to the date of construction of the subject buildings in 1988/1989, however, it is considered unlikely that the building materials contain ACMs. In the event that ACMs are found on-site during construction, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations. In addition, development of the Project would include the use of commercially sold construction materials without asbestos or ACMs. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment. Therefore, the Project would not exacerbate environmental hazards related to risk of upset or accident conditions associated with the exposure of ACMs to the public or environment.

Lead-Based Paint

Lead is a naturally occurring element and heavy metal that was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments, and drying agents from the early 1950s to 1972, when the Consumer Products Safety Commission specified limits on lead content in such products. The most common paths of lead exposure in humans and adverse health effects are through ingestion and inhalation. Due to the date of construction of the existing buildings in 1988/1989, it is considered unlikely that lead-based paint (LBP) was utilized onsite. According to the Phase I ESA, the paint coatings of the existing structures were described to be in “good condition” at the time of the site reconnaissance in 2019. In the event that LBP is found within areas proposed for demolition or renovation, suspect materials would be removed in accordance with procedural requirements and regulations for the proper removal and disposal of LBP prior to construction activities, including standard handling and disposal practices pursuant to OSHA regulations. Example procedural requirements include the use of respiratory protection devices while handling lead-containing materials, containment of lead or materials containing lead on the Project Site or at locations where construction activities are performed, and certification of all consultants and contractors conducting activities involving LBP or lead hazards. Therefore, the Project would not exacerbate environmental hazards related to risk of upset or accident conditions associated with the exposure of LBP to the public or environment.

Polychlorinated Biphenyls

Typical sources of polychlorinated biphenyls (PCBs) include electrical transformer cooling oils, fluorescent light fixture ballasts, and hydraulic oil. In 1976, the U.S. Environmental Protection Agency (USEPA) banned the manufacture and sale of PCB-containing transformers. Prior to this date, transformers were frequently filled with a dielectric fluid containing PCB-laden oil. Due to their hazardous properties, all aspects of PCBs are strictly regulated by the USEPA under the Toxic Substances Control Act. These regulations ban the manufacture of PCBs although the continued use of existing PCB-containing equipment is allowed. Transformer oil containing PCBs at a concentration exceeding five parts per million is the California-regulated concentration for hazardous waste though PCBs in transformer oil at a concentration up to 50 parts per million are currently allowed in transformers in California. The Toxic Substances Control Act also contains provisions controlling the continued use and disposal of existing

PCB-containing equipment. The buildings on-site were constructed in 1988/1989 and the Phase I ESA found no evidence of PCB-containing transformers or equipment observed on the Project Site at the time of the site reconnaissance in 2019. Nevertheless, in the event that PCBs are found within areas proposed for construction, suspect materials would be removed in accordance with all applicable federal, state, and local regulations, such as the Toxic Substances Control Act and California Hazardous Waste Control Law. Therefore, the Project would not exacerbate environmental hazards related to risk of upset or accident conditions associated with exposure of PCBs to the public or environment.

Oil Wells and Methane

The Phase I ESA included a review of oil field maps published by the State of California Geologic Energy Management Division (CalGEM) and online mapping systems (DOMS 2.0) in order to determine if oil production occurred on or near the Project Site. The CalGEM online mapping systems indicated that there are two wells within a 2,000-foot radius of the Project Site. One well is located approximately 1,200 feet northwest of the Project Site and is listed as plugged. The other well is approximately 1,300 feet southeast of the Project Site and is also listed as plugged. In addition, based on the City's General Plan Safety Element, the Project Site is not located within an oil field or oil drilling area in the City.[156] According to the Phase I ESA, the Project Site is not located within a recognized Methane Hazard Zone. The Project Site is also not found to be located within a designated Methane Zone or Methane Buffer Zone mapped by the City.[157] Therefore, the Project would not exacerbate environmental hazards relative to oil wells or methane.

Soil Gas Conditions

As described in the Phase I ESA, California Environmental previously observed geotechnical borings drilled in 2016 beneath the western portion of the Project Site. No visual evidence of impacted soils was observed during the drilling to 50 feet below ground surface. California Environmental also conducted soil vapor sampling to assess the presence of volatile organic compounds beneath the Project Site. The samples detected concentrations of tetrachloroethene (PCE) ranging from 0.1 µg/L to 2.9 µg/L, which exceed the soil gas screening levels for residential uses. The samples also detected benzene with concentrations ranging from 0.1 µg/L to 0.17 µg/L. Based on observations and sampling in 2016, no evidence of a significant on-site release of PCE was detected, and the PCE in soil gas was suggested to be possibly associated with an off-site source or with small on -site releases that occurred prior to the L.A. Times redevelopment work of the late 1980s. While California Environmental considered the vapor intrusion potential for the existing development to be low due to the thickened structural slabs, further evaluation of other potential conduit pathways and structural slab penetrations was recommended to determine whether sealing of those conduits and penetrations is warranted. Furthermore, additional soil vapor sampling was recommended to determine whether any vapor mitigation measures (e.g., vapor barriers or venting systems) may be warranted for new structures.

Thus, in March 2021, soil gas sampling was conducted onsite. As described in the Soil Gas Report, exterior soil gas samples were obtained on the western portion of the Project Site to evaluate the potential

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156 Los Angeles General Plan Safety Element, November 1996, Exhibit E, Oil Field & Oil Drilling Areas, p. 55.

157 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166-023-010, 5166-023-016, 5166-027-014, and 5166-028-004, http://zimas.lacity.org/, accessed March 11, 2021.

for vapor intrusion into the proposed new buildings, and interior sub-slab soil gas samples from beneath the existing Plant were obtained to evaluate the vapor intrusion potential for the current structure.[158] In addition, radon soil gas samples were collected concurrently. Samples were obtained and analyzed for VOCs in accordance with CalEPA/DTSC/RWQCB guidelines. The future vapor intrusion potential for the VOCs detected in all soil gas samples were evaluated using the methods described in the *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air* document prepared by DTSC and adopted by the State of California in 2011 and the updated methods outlined in the *Draft Supplemental Guidance: Screening and Evaluating Vapor Intrusion* document prepared by DTSC and State Water Resources Control Board in 2020, which is currently out for public comment but has not been formally adopted by the State of California.

As discussed in the Soil Gas Report, the predicted indoor air values were compared to the DTSC screening levels for ambient air at a commercial property, as well as the San Francisco RWQCB's Environmental Screening Levels (ESLs).[159] Based on the Soil Gas Report's analysis for the existing development, future indoor air within the existing Plant would meet the current DTSC ambient air guidelines in commercial buildings for all compounds detected in soil gas. Furthermore, the analysis also utilized the DTSC risk management methodology used to assess future cancer risk associated with vapor intrusion to indoor air. As concluded by the Soil Gas Report, no response action or mitigation is required for the existing development. Nonetheless, in accordance with the recommendations of California Environmental, the Project shall implement Mitigation Measure HAZ-MM-1, which provides that a slab penetration survey be conducted within the existing structures during future renovation activities in order to identify potential soil gas intrusion pathways, such as through wet and dry utilities slab penetrations, and then seal the identified potential pathways, using good engineering practice, as necessary out of an abundance of caution . With incorporation of Mitigation Measure HAZ-MM-1 into the Project, the Project's potential impacts, if any, associated with future cancer risk related to indoor air in the renovated buildings would be less than significant.

Based on the analysis for future new buildings, the calculated indoor air values would just slightly exceed DTSC cancer risk management criteria. However, the Project shall incorporate Mitigation Measure HAZ-MM-2, below, for all new commercial structures. With incorporation of Mitigation Measure HAZ-MM-2 into the Project, the Project's potential impacts associated with future cancer risk related to indoor air in the new commercial buildings would be less than significant.

Furthermore, the Soil Gas Report reveals an overall decrease in the PCE soil gas concentrations as between the concentrations measured in and the updated soil gas measurements in 2021. This updated assessment data reveals no evidence of an onsite VOC release that requires reporting to a lead enforcement agency.

Based on the above, the Project would not create a significant hazard to the public or the environment through the exacerbation of reasonably foreseeable upset and accident conditions involving the release of

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158 The interior sub-slab probes were sampled for both VOCs and radon to enable calculation of a building-specific attenuation factor for VOCs per the CalEPA-DTSC Vapor Intrusion Guidance. The site-specific attenuation factor utilized in the future indoor air risk calculations was used only in the analysis for the existing Plant.

159 As stated in the Soil Gas Report, the LARWQCB uses the ESLs as a screening tool for conservative analysis of threats to human health and the environment, including but not limited to the potential for vapor intrusion.

hazardous materials into the environment. With the incorporation of Mitigation Measures HAZ-MM-1 and HAZ-MM-2, below, into the Project, the Project's impacts would be less than significant.

Mitigation Measure HAZ-MM-1: A slab penetration survey be conducted within the existing structures during future renovation activities in order to identify potential soil gas intrusion pathways such as through wet and dry utilities slab penetrations. These pathways shall then be sealed as necessary out of an abundance of caution and using good engineering practice.

Mitigation Measure HAZ-MM-2: The Project shall incorporate a vapor intrusion mitigation membrane and/or vent pipe into the building design of all future commercial structures to reduce the risk values below the DTSC risk management criteria.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. There are no schools located within a 0.25 mile radius of the Project Site. The nearest school is Metropolitan High School located approximately 0.3 mile northeast of the Project Site. As discussed above, the types and amounts of hazardous materials that would be used in connection with construction of the Project would be typical of those used during construction of commercial developments and would include vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations including, but not limited to, federal and state Occupational Safety and Health Act requirements, and would not create a significant hazard to nearby schools. As such, the Project's potential impacts associated with hazards within a one-quarter mile of an existing school would be less than significant, and no mitigation measures would be required.

d. Would the project 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?

Less Than Significant Impact. Section 65962.5 of the California Government Code 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. While Section 65962.5 refers to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies including the Department of Toxic Substances Control (DTSC), the State Water Resources Control Board (SWRCB), and CalEPA.

As part of the Phase I ESA, agency database lists were reviewed for known or suspected contaminated sites and for sites that store, generate, or use hazardous materials near the subject property. The Phase I ESA reports that the search revealed that the Project Site is listed on the standard environmental government sources, including the USEPA Facility Index System/Facility Registry System (FINDS), USEPA Enforcement and Compliance History Online (ECHO), UST, Emissions Inventory Data (EMI), Resource Conservation and Recovery Act—Small Quantities Generators (RCRA-SQG), US Aerometric Information Retrieval System (AIRS), Statewide Environmental Evaluation and Planning System—

Underground Storage Tank (SWEEPS UST), California Facility Inventory Database—Underground Storage Tank (CA FID UST), National Pollutant Discharge Elimination System (NPDES), Waste Data System (WDS), and HAZNET databases. While the Project Site appears on these lists, the Project Site is not listed as a contaminated site.

In addition, as part of the Phase I ESA, inquiry letters were sent to the California DTSC and LARWQCB. Responses from both agencies indicate that no files are maintained for the properties within the Project Site. CalEPA, DTSC, and RWQCB online databases were also reviewed. The DTSC Envirostor lists Federal Superfund, State Response, Voluntary Clean-ups, School Clean-ups and Investigations, Military Evaluations and Geotracker LUFT/SLIC databases. The Project Site is listed on the Envirostor database as a tiered permit site and a Phase I Verification Inspection Report dated December 5, 1997. However, the Project Site is not otherwise listed with any open environmental regulatory violations or open matters.

The Phase I ESA also researched the SCAQMD online Facility Information Detail (FIND) database for any active and/or inactive records related to the Project Site. The review of that database indicated that records are maintained for the Project Site, including active permits to operate machinery related to newspaper printing issued by the SCAQMD. Inactive permits were also listed for fuel USTs previously removed from the Project Site. Notices of Violation (NOVs) were issued to Los Angeles Times Communications, LLC on September 13, 2001, June 27, 2013, August 9, 2019, and July 6, 2021. The Project Site is listed as "in compliance" or "case closed" for all NOVs with the exception of the August 9, 2019, violation. The August 2019 violation was issued for "failure to register with the District to implement an emission reduction program by the annual due date." All NOVs are related to clerical and administrative tasks, and do not indicate any hazardous materials releases associated with the Project Site.

Notices to comply (NTCs) were issued to Los Angeles Times Communications, LLC on August 23, 2002, March 31, 2010, May 4, 2016, April 6, 2018, July 12, 2019, and September 26, 2019. The Project Site is listed as "in compliance" for all notices following re-inspections. All NTCs are related to clerical and administrative tasks, and do not indicate any hazardous materials releases associated with the Project Site.

Beyond the Project Site, the nearest listed environmental concern site is located at 1804 East 8th Street on the adjacent property to the north. This property is listed on the SWEEPS UST and CA FID UST databases for the use of underground storage tanks. No releases are listed on the Geotracker database for this off-site property. The nearest listed contaminated site to the Project Site is located approximately 2,600 feet to the west at 754 E. Pico Blvd. This facility is undergoing assessment for a release of VOCs, including PCE to the soil, and is an open investigation. As stated in the Addendum to the Phase I ESA, based on the distance from the Project Site, however, the site at 754 E. Pico Blvd. does not pose an environmental hazard concern to the Project Site.

Based on the above, the Project would not be located on a contaminated site and would not create or exacerbate a significant hazard to the public or the environment. As such, the Project's potential impacts would be less than significant, and no mitigation measures would be required.

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 or excessive noise for people residing or working in the project area?

No Impact. The Project Site is not located within 2 miles of an airport or within an airport planning area. The nearest airport is the Los Angeles International Airport (LAX), located approximately 11 miles from the Project Site. Given the distance between the Project Site and this airport, the Project would not have the potential to exacerbate current environmental conditions that would result in a safety hazard or excessive noise for people residing or working in the Project Site area. Therefore, no impact would occur, and no mitigation measures would be required.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. According to the Safety Element of the City of Los Angeles General Plan, the nearest disaster routes to the Project Site are Alameda Street, which is located adjacent to the Project Site, and the I-10, which is located 0.3 mile south of the Project Site.[160,161] While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would remain open in accordance with standard construction management plans that are required to be prepared and would be implemented to ensure adequate circulation and emergency access.

Operation of the Project would generate traffic in the Project Site vicinity and would result in some modifications to the Project Site's access. However, as discussed under Checklist Question No. XV.a of this IS/MND, the Project would comply with LAFD access requirements and would not impede emergency access within the Project vicinity.

Therefore, the Project would not physically interfere with or impair the implementation of the City's designated disaster routes or the City's emergency response plan. The Project's potential impacts would be less than significant, and no mitigation measures would be required.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project Site is located in a fully developed urban area without wildlands in its vicinity. The Project Site is not located within either a City-designated Very High Fire Hazard Severity Zone[162] or a City-designated fire buffer zone.[163] Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. In particular, LAMC Section 57.106.5.2 provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; LAMC Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction

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

161 County of Los Angeles Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area, August 2008.

162 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166-023-010, 5166-023-016, 5166-027-014, and 5166-028-004, http://zimas.lacity.org/, accessed March 11, 2021.

163 City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

projects; and LAMC Section 57.507.3.1 establishes fire water flow standards. In addition, the Project's proposed studio and commercial uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires. As such, no impact would occur, and no mitigation measures would be required.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii. 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; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

The following analysis is based, in part, on the *Preliminary Hydrology and LID Study 8th and Alameda Studios* (Hydrology Report) prepared for the Project by David Evans and Associates, dated March 2021 and included as Appendix IS-9 of this IS/MND.

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. As discussed below, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Surface Water Quality

Construction

During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. However, as Project construction would disturb more than 1 acre of soil, the Project would be required to implement a Storm Water Pollution Prevention Plan (SWPPP) under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In accordance with the requirements of the NPDES Construction General Permit, the Project would prepare and implement a site-specific SWPPP adhering to the California Stormwater Quality Association Best Management Practices (BMP) Handbook. The SWPPP would set forth BMPs for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. The SWPPP would be carried out in compliance with the requirements of the State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Board, Los Angeles Region (LARWQCB). In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), which include standard erosion control measures and mandate the preparation and implementation of an erosion control plan to reduce the effects of sedimentation and erosion in compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. For construction during the rainy season (October 1st to April 14th), the City's grading permit regulations require the implementation of a wet weather erosion control plan that would be prepared pursuant to the "Manual and Guideline for Temporary and Emergency Erosion Control," adopted by the Los Angeles Board of Public Works and incorporated into the City's Development Best Management Practices Handbook, Part A, Construction Activities.[164] Such requirements would be incorporated into the Project construction SWPPP. Controls for non-stormwater runoff would also be incorporated into the Project's SWPPP.

As discussed in the Hydrology Report and Geotechnical Report, the historical groundwater in the vicinity of the Project Site is more than 120 feet below ground surface. Additionally, no groundwater was encountered within the Project Site during subsurface explorations performed in 1987 to a depth of 76 feet ground surface. As described in Section 2, Project Description, of this IS/MND, the Project's proposed parking structure, Building 8, would require a maximum depth of 55 feet below grade to accommodate footings, and the grip and lighting building, Building 2, would require an excavation depth of 5 feet below grade. Therefore, it is not anticipated that dewatering would be required during Project construction. On

[164] LAMC Sections 91.7007.1 and 61.02.

the highly unlikely possibility that perched groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations pursuant to the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, LARWQCB Order No. R4-2018-0125 ("Dewatering Permit").[165] Lastly, the four historical USTs that were previously removed from the Project Site and the two existing USTs on-site would not pose a threat to groundwater, as discussed in Section IX., Hazards and Hazardous Materials, of this IS/MND.

With the implementation of regulatory compliance requirements including site-specific BMPs included as part of the SWPPP required to comply with NPDES program requirements under federal and state law and City grading permit regulations, the Project would reduce or eliminate the discharge of potential pollutants from stormwater runoff. Therefore, with compliance with NPDES requirements and City grading regulations, construction of the Project would not result in discharge that would violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality. Thus, temporary construction-related impacts on surface water quality would be less than significant, and no mitigation measures are required.

Operation

Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the LARWQCB prepares a list of impaired waterbodies and the specific pollutant(s) in the region referred to as the 303(d) list. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). The Project Site is located within and drains into the Los Angeles River Watershed Reach 2, which runs from Figueroa Street to Carson Street.[166] The constituents of concern listed for the Los Angeles River Watershed Reach 2 under California's Clean Water Act Section 303(d) List include ammonia, copper, lead, indicator bacteria, nutrients (algae), oil, and trash.[167] Project operations are not anticipated to increase concentrations of these constituents of concern for the Los Angeles River Watershed but would introduce sources of potential water pollution that are typical of commercial and office uses (e.g., sediment, nutrients, pesticides from runoff from landscaping areas, metals, pathogens, trash and debris, oil and grease). Stormwater runoff from precipitation events could also potentially carry urban pollutants into municipal storm drains. Under the City's Low Impact Development (LID) Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the greater of a 85th percentile storm event or the first 0.75-inch of stormwater runoff from a storm event (i.e., "first flush"). As discussed in the Hydrology Report, based on site conditions, infiltration would be most feasible BMP for the Project Site to address these pollutants in accordance with the City's LID Ordinance (Ordinance 183,833) and the City of

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165 See www.waterboards.ca.gov/losangeles/board_decisions/adopted_orders/general_orders/r4-2018-0125/OrderNoR4-2018-0125(Order).pdf, last accessed August 11, 2021.

166 California, State Water Resources Control Board, 2014 and 2016 California 303(d) List of Water Quality Limited Segments, www.waterboards.ca.gov/water_issues/programs/tmdl/2014_16state_ir_reports/category5_report.shtml, accessed April 8, 2021.

167 Ibid.

Los Angeles Planning and Management Handbook for Low Impact Development, Part B, Planning Activities ("LID Manual").[168]

Under existing conditions, the hardscape is relatively flat and is comprised of asphalt and concrete pavement. As described in the Hydrology Report, the existing site is approximately 98 percent impervious and consists of buildings, paved surface lots, and minimal landscape areas. The Project Site currently drains to a network of on-site catch basins that convey stormwater flows into the existing City-maintained underground 12-foot arched concrete storm drain channel, which intersects the Project Site from the northwest to the east through Lemon Avenue. The on-site storm drain network captures flow from the entire Project Site, including the existing roof drainage of both the Plant and vehicular maintenance building and sheet flow from the surface parking lot. The existing underground 12-foot arched storm drain main conveys all flow from the Project Site as well as flow from two catch basins at the intersection of Lawrence Street and Olympic Boulevard and several catch basins along 8th Street and the intersection of Lawrence Street and 8th Streets.

Per the LID requirements, as determined by the City of Los Angeles Department of Public Works, Bureau of Sanitation, the Project would include one or more of the following BMPs to treat a "first flush" volume of runoff equal to the greater of an 85th Percentile 24-hour or 0.75-inch rainfall event (in priority order to the maximum extent feasible):

- Infiltration basins or trenches;
- Rainwater harvesting cisterns for irrigation reuse;
- Biofiltration via planter boxes, basins, or proprietary treatment devices.[169]

Infiltration BMPs must be designed to retain the design storm standard, and must be located at suitable distances from buildings, slopes, property lines, and seasonal high groundwater levels. Infiltration BMPs must also be located in suitable soils with high permeability rates that are not subject to hazards such as liquefaction or expansion.

As described in the Hydrology Report, during Project operations, the existing drainage pattern would be maintained with slight grade changes. While the Project would provide more landscaping as compared to the existing conditions, in order to provide a conservative analysis, the amount of impervious surface area during Project operations is assumed to remain at approximately 98 percent (refer to Figure 3 of the Hydrology Report). The on-site 12-foot arched storm drain channel and any existing laterals on-site would be protected in place. All on-site catch basins, storm drain pipes, LID devices and BMPs would also be privately maintained. In compliance with the LID Ordinance, the Project proposes to install infiltration drywells as the selected BMP for the Project Site. Specifically, the Project Site would convey surface and roof drainage to the proposed on-site drywell BMPs before overflowing to the on-site storm system that conveys flow into the 12-foot arched storm drain main. The analysis conducted for the Project in the Hydrology Report demonstrates that the proposed drywell system could be designed to retain and treat

[168] See www.lacitysan.org/cs/groups/sg_sw/documents/document/y250/mde3/~edisp/cnt017152.pdf, last accessed August 11, 2021.

[169] LID Manual, p. 21.

sufficient quantities of stormwater to comply with the requirements of the LID Ordinance. However, in accordance with the LID Ordinance, the analysis required at final engineering during the final design process during building permit plan check with the City of Los Angeles Department of Public Works and the Los Angeles Department of Building and Safety will determine the ultimate BMPs at the Project Site needed to meet the LID Ordinance standard. Therefore, with the implementation of existing and proposed LID BMPs in compliance with the City's LID Ordinance and LID Manual, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Impacts to surface water quality during operation of the Project would be less than significant, and no mitigation measures are required.

Groundwater Quality

Construction

As discussed above, based on the historically highest groundwater level and depth of proposed excavation, Project construction activities are not expected to encounter groundwater and temporary dewatering is not anticipated. In the event groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable NPDES requirements, including the Dewatering Permit.

An existing groundwater well exists approximately 0.5 mile northeast of the Project Site near the intersection of 7th Street and Mateo Street.[170] Even if perched shallow groundwater were encountered during excavation activities for the Project, such groundwater would be sufficiently shallow and distant laterally and horizontally from the screened depths at which the nearest groundwater well would operate that such an encounter could not reasonably be expected to have any effect on the groundwater well. Moreover, with the implementation of temporary pumps and filtration in accordance with regulatory requirements including the Dewatering Permit, in the unlikely event that groundwater is encountered, construction activities would not be anticipated to affect this existing well for this additional reason, and no other no groundwater production wells or supply wells exist within one mile of the Project Site.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives could be used and would therefore require proper management and disposal. Compliance with all applicable manufacturers' instruction and federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, which would be addressed in the Project's construction SWPPP, would reduce the potential for the construction of the Project to release contaminants that could percolate into groundwater.

Based on the above, construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirement associated with groundwater protection. Therefore, construction-related impacts on groundwater quality would be less than significant, and no mitigation measures would be required.

[170] California Water Boards, GAMA Groundwater Information System, https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/, accessed April 7, 2021.

Operation

The most prominent type of operational activities from a development project that affect groundwater quality are typically spills of hazardous materials and leaking storage facilities and tanks, including USTs. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner in accordance with applicable regulatory requirements, thereby resulting in little threat to groundwater. Other types of risks such as leaking underground storage tanks have a greater potential to affect groundwater. As discussed above in Checklist Question No. IX, Hazards and Hazardous Materials, and in the Phase I ESA, the presence of petroleum impacted soil associated with the historical USTs removed from the site and the remedial excavation areas all received written regulatory closure from the applicable governmental agencies, and no further action or investigation is recommended regarding the HRECs. As also discussed above, the two 15,000-gallon diesel USTs, which are located beneath the southeast corner of the Project Site as a fuel source for the emergency generator system, are currently in compliance with the current applicable UST construction and monitoring requirements. As part of the Project, these two diesel USTs would remain in their existing location, and the Project would not involve any construction in or immediately near the USTs. Furthermore, the Project would continue to comply with relevant requirements during operation. In addition, the Project would not include any new USTs that would have the potential to expose groundwater to contaminants.

While the development of new building facilities would increase the use of on-site hazardous materials as described above (i.e., cleaning products, those used for maintenance of landscaping, paints, adhesives, aerosol spray paint, as well as other materials for production and set making), as detailed in Checklist Question No. IX.a, compliance with all applicable existing regulations at the Project Site regarding the handling and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Furthermore, as described above, operation of the Project would not require extraction from the groundwater supply based on the depth of excavation for the proposed uses and the depth of groundwater below the Project Site. The Project also does not include the installation or operation of water wells, or any extraction system. Lastly, the Project includes several proposed drywells on-site which would filter stormwater prior to infiltration.

Therefore, Project operations would not violate any water quality standards or waste discharge requirements with respect to groundwater or otherwise substantially degrade ground water quality. The Project's potential impact on groundwater quality during operation would be less than significant, and no mitigation measures would be required.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. As provided by the following analysis, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

Construction

The Project Site specifically overlies the Central Subbasin within the Los Angeles Coastal Plain Groundwater Basin. As described above, the existing groundwater well closest to the Project Site is located approximately 0.5 mile northeast and would not be impacted by Project construction. No other water supply wells are located at or within one mile of the Project Site. The Project would not include the construction of water supply wells. As described in Section 2, Project Description, of this IS/MND, the Project's proposed parking structure, Building 8, would require a maximum depth of 55 feet below grade to accommodate footings, and the grip and lighting building, Building 2, would require an excavation depth of 5 feet below grade. As provided in the Hydrology Report and Geotechnical Report included in Appendix IS-9 and Appendix IS-6 of this IS/MND, respectively, historical groundwater levels are approximately 120 feet below ground surface. Therefore, dewatering is not anticipated during construction activities for the Project. However, if dewatering is required, the Project would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations under the Dewatering Permit. Furthermore, since operation of dewatering systems would only be temporary, local groundwater hydrologic conditions, including groundwater production wells or public water supply wells within one mile of the Project Site, would not be affected by any unanticipated Project dewatering operations, and regional impacts to groundwater supplies and management of the basin would not be considered significant. Furthermore, because the Project would maintain certain existing onsite structures. Therefore, the Project's temporary construction activities would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts on groundwater supplies during construction of the Project would be less than significant, and no mitigation measures would be required.

Operation

As previously discussed, similar to existing conditions, the Project Site would remain approximately 98 percent impervious following construction of the Project. As such, the potential for groundwater recharge during Project operations would remain minimal. Furthermore, the Project's BMPs would control stormwater runoff with no increase in runoff resulting from the Project. Also, the Project would not include the installation of water supply wells. The Project would not impact the existing groundwater well located approximately 0.5 mile northeast of the Project Site, and there are no other existing wells or spreading ground within one mile of the Project Site. Therefore, Project operations would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant, and no mitigation measures would be required.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;

Less Than Significant Impact.

Construction

The Project Site is not crossed by any water courses or rivers. Construction activities for the Project would include demolition of portions of the surface parking lot, excavation for footings, grading, and drywells; construction of the sound stage/support buildings, shops/support building, parking structure, and guard booths; and constructing hardscape and landscape around the buildings. These activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows from both stormwater and non-stormwater discharges. These BMPs would be designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion to be incorporated into the Project SWPPP. Thus, through compliance with all NPDES General Construction Permit requirements and a SWPPP that includes implementation of BMPs required by the NPDES program as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As such, construction-related impacts to erosion and siltation would be less than significant, and no mitigation measures would be required.

Operation

As previously discussed, the Project Site is currently comprised of approximately 98-percent impervious surfaces under existing conditions, which would remain the same upon buildout of the Project. The proposed on-site grading would maintain the existing drainage pattern with slight grade changes. However, the Project would maintain and enhance the existing on-site storm drain system which collects water on-site and connects to a stormwater main to transport it off-site. Accordingly, similar to existing conditions, there would be a limited potential for erosion or siltation to occur from exposed soils or large expanses of pervious areas. In addition, as described above, the Project would include infiltration BMPs that would address drainage flows and would ensure that soil erosion does not occur. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion or siltation on-site or off-site would occur. Operational impacts to erosion and siltation would be less than significant, and no mitigation measures would be required.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less Than Significant Impact.

Construction

As indicated above, there are no streams or rivers within or immediately surrounding the Project Site. Construction activities for the Project would involve removal of a portion of the surface parking lot as well as excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and

making the Project Site temporarily more permeable and thus reducing runoff as compared to impermeable surfaces. As noted above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. These BMPs and erosion control measures would contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. Thus, through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in increased runoff or flooding on- or off-site. As such, construction-related impacts associated with flooding from surface runoff would be less than significant, and no mitigation measures would be required.

Operation

In addition, as previously discussed, the Project would not change the percentage of impervious surfaces on-site. Furthermore, under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of capture and use and/or biofiltration system BMPs as established by the LID Manual, including several drywells proposed on-site. The installed drywells would be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. Therefore, with implementation of BMPs to capture and treat stormwater that are not current present on the Project Site, the Project would decrease the rate or amount of surface runoff in a manner which would decrease runoff and not result in or otherwise increase the potential for flooding on- or off-site. Operational impacts associated with flooding from surface runoff would be less than significant, and no mitigation measures would be required.

iii. 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; or

Less Than Significant Impact. As discussed above, while the Project would provide more landscaping as compared to the existing conditions, in order to provide a conservative analysis with respect to the potential for runoff, the amount of impervious surface area during Project operations was assumed in the Project's Hydrology Report to remain at 98 percent (see Figure 3 of Hydrology Report). As detailed in the Hydrology Report, a comparison of the pre- and post-Project peak flow rates indicates a decrease in stormwater runoff from the Project Site from 60.03 cubic feet per second (cfs) to 58.86 cfs. In addition to maintaining existing BMPs, the Project would implement BMPs by installing drywells that would store, infiltrate , and treat the required LID volumes and would treat all stormwater. Consequently, the Project would reduce the amount of stormwater runoff discharging into the existing storm drainage infrastructure compared to existing conditions. In addition, the Project would not cause flooding during a 50-year storm event or result in a permanent adverse change to the movement of surface water on the Project Site. Therefore, the Project would not 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. Impacts would be less than significant, and no mitigation measures would be required.

iv. Impede or redirect flood flows?

No Impact. The development of the Project would result in a slightly reduced volumetric flow rate when compared to existing conditions as a result of the implementation of BMPs under the LID Ordinance, but

would otherwise maintain existing impervious surfaces and stormwater conveyance systems. As such, the Project would not substantially impede, alter or redirect flood flows. Furthermore, the Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City.[171,172] In addition, as discussed above, the Project would not cause flooding during a 50-year storm event or result in a permanent adverse change to the movement of surface water on the Project Site. Thus, the Project would not substantially alter the existing drainage pattern of the site or area in a manner which would impede or redirect flood flows. No impacts would occur, and no mitigation measures would be required.

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Less Than Significant Impact. As discussed above, the Project Site is not located within a 100 year flood hazard area as mapped by FEMA or by the City. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a tsunami hazard area.[173] Therefore, no tsunami or tsunami events would be expected to impact the Project Site and cause any discharge of pollutants. Additionally, there are no standing bodies of water near the Project Site that may experience a seiche, and therefore there is no significant risk that flows from a seiche could result in the discharge of any pollutants from the Project Site caused by the Project.

Earthquake-induced flooding can result from the failure of dams or other water-retaining structures resulting from earthquakes. The Safety Element of the City of Los Angeles General Plan maps the Project Site as being located within a potential Inundation Area, and the nearest levee is along the Los Angeles River located approximately 0.4 mile east of the Project Site. The U.S. Army Corps of Engineers operates and maintains the 22.5-mile stretch of the Los Angeles River between Lankershim Boulevard in Hollywood and Stuart and Grey Road in Downey, which includes the portion to the east of the Project Site. Their maintenance activities include inspection and cleaning of the channel walls and removing vegetation growing in cracks and joints.[174] With continued inspection, maintenance and flood control activities, the potential for substantial adverse impacts related to inundation at the Project Site due to proximity to the Los Angeles River would be less than significant, and no mitigation measures would be required.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As discussed above, the Project Site is located within the Los Angeles River Watershed.[175] According to SWRCB, constituents of concern listed for the Los Angeles River

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171 Federal Emergency Management Agency, Flood Insurance Rate Maps, Panel Numbers 06037C1636G, effective December 21, 2018.

172 Los Angeles General Plan Safety Element, November 1996, Exhibit F, 100-Year & 500-Year Flood Plains, p. 57.

173 Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation & Tsunami Hazard Areas, p. 59.

174 U.S. Army Corps of Engineers, Los Angeles River, www.spl.usace.army.mil/Missions/Asset-Management/Los-Angeles-River/, accessed August 10, 2021.

175 California, State Water Resources Control Board, 2014 and 2016 California 303(d) List of Water Quality Limited Segments, www.waterboards.ca.gov/water_issues/programs/tmdl/2014_16state_ir_reports/category5_report.shtml, accessed April 8, 2021.

Watershed Reach 2 from Carson Street to Figueroa Street under California's Clean Water Act Section 303(d) List located include ammonia, copper, lead, indicator bacteria, nutrients (algae), oil, and trash.[176] The County of Los Angeles, the City of Los Angeles, and all other cities in the Los Angeles Watershed are responsible for the implementation of watershed improvement plans or Enhanced Watershed Management Programs (EWMP) to improve water quality and assist in meeting the TMDL milestones. The objective of the EWMP Plan for the Los Angeles River is to determine the network of control measures (often referred to as best management practices) that will achieve required pollutant reductions while also providing multiple benefits to the community and leveraging sustainable green infrastructure practices. Furthermore, as discussed above, the Project would be required to implement a SWPPP under the NPDES Construction General Permit that would set forth BMPs for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction.

Potential pollutants generated by the Project would be typical of commercial and office land uses and may include sediment, nutrients, pesticides, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. The Project would implement an infiltration drywell system to filter, treat, and reduce stormwater pollutants in accordance with the City's LID requirements and SWPPP. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for the Los Angeles River Watershed.

Furthermore, as discussed above, similar to existing conditions, the Project Site would remain approximately 98 percent, and the potential for groundwater recharge during Project operations would remain minimal. The Project would not include the installation of water supply wells or impact the existing groundwater well located approximately 0.5 mile northeast of the Project Site. In addition, the Project Site overlies the Central Los Angeles Groundwater Basin, which is managed pursuant to a stipulated judgment in a groundwater adjudication by the basin watermaster, and is therefore not subject to the Sustainable Groundwater Management Act or a sustainable groundwater management plan.

With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures are required.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒

[176] Ibid.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a. Would the project physically divide an established community?

No Impact. As discussed in Section 2, Project Description, of this IS/MND, the Project Site is bounded by 8th Street to the north, Lemon Street Avenue to the east, East Olympic Boulevard and Hunter Street to the south, and Lawrence Street and South Alameda Street to the west. The Project Site is currently developed with the Plant, the 23,005-square-foot vehicular maintenance building, six ancillary structures, and existing surface parking. The Project Site is within the Central City North Community Plan Area. The area surrounding the Project Site is highly urbanized and largely industrial, with warehouses, distribution facilities, shops, and factories in a range of scales and reflecting a wide variety of construction dates. Some mixed-use and commercial properties are also present. Land uses immediately surrounding the Project Site include industrial uses to the north, west, and east; industrial and retail uses and I-10 to the south; and a restaurant to the southwest.

As described in Section 2, Project Description, of this IS/MND, the Project would renovate the existing Plant to provide studio, production support, and office uses, and the existing maintenance building to provide grip and lighting uses. The Project would also remove a portion of the existing surface parking to construct three new sound stage buildings with attached three-story support/office buildings, a two-story shops/office building, three guard booths, and a nine-level above-ground parking structure. The Project's uses would be consistent with other commercial developments located adjacent to and in the general vicinity of the Project Site. All proposed development would also occur within the boundaries of the Project Site. In addition, the Project does not propose the development of a freeway or other large infrastructure that could divide the existing surrounding community. Therefore, for all of these reasons, the Project would not physically divide an established community. No impacts related to the physical division of an established community would occur, and no mitigation measures are required.

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. The following discussion addresses the Project's consistency with the requirements and policies of the various local plans and regulatory documents that guide development on the Project Site and that were adopted at least in part to avoid or reduce the environmental effects of development, including the General Plan Framework Element (Framework Element), Central City North Community Plan, City of Los Angeles Municipal Code (Chapter 1—Planning and Zoning), and Southern California Association of Governments (SCAG) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Under CEQA, the Project would conflict with an applicable plan if it

does not meet the general intent of the plan and/or would obstruct the attainment of the plan's primary goals.[177] As discussed below, the Project would not conflict with any of the applicable plans.

City General Plan Framework Element

The Framework Element establishes the conceptual basis for the City's General Plan by setting forth a Citywide comprehensive long-range growth strategy and defining Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. The Framework Element land use policies are further guided at the community level through Community Plans and Specific Plans. As detailed in Table 9 on page 139, the Project would be consistent with the applicable goals of the Land Use, Urban Form and Neighborhood Design, Open Space and Conservation, Infrastructure and Public Services, and Economic Development chapters of the Framework Element.

The Project would be consistent with, and not conflict with, the Framework Element's Land Use Chapter as the Project would contribute to the needs of the City's existing and future residents, businesses, and visitors by developing a studio campus that which would enhance the character of the surrounding area, provide a similar mix of land uses to the existing uses in the vicinity, and create employment opportunities. In addition, the Project's design and landscaping improvements in an area in close proximity to public transit and opportunities for walking and biking would promote a safe and improved pedestrian environment and facilitate a reduction of vehicle trips and vehicle miles traveled.

The Project would be consistent with, and not conflict with, the relevant objectives and policies that support the goals of the Framework Element's Urban Form and Neighborhood Design Chapter, which focus on creating a livable City for existing and future residents that is attractive to future investment, and creating a City of interconnected, neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales. In addition, Project signage would be designed to be aesthetically compatible with the existing and proposed architecture and to contextualize lighting designs with other signage in the surrounding neighborhood. Furthermore, the Project would be designed with security features to ensure safety for employees and visitors.

The Project would be consistent with, and not conflict with, the relevant objectives and policies that support the goals of the Framework Element's Open Space and Conservation Chapter by providing a variety of open space areas within the Project Site. The Project would create both indoor and outdoor open space and recreational amenities for tenants. Specifically, the Project would include an indoor 15,500-square-foot fitness and health center as well as lounge/seating areas. The Project would also include 122,010 square feet of open space, including a 5,800-square-foot outdoor dining patio on the northwestern border of Building 1 and a 6,100-square-foot outdoor dining patio on the western border of Building 1. Landscaping would be located throughout the Project Site near the outdoor patios and bordering the buildings and parking areas, and new trees would be planted in accordance with the City of Los Angeles Landscape Ordinance 170,978 and Bureau of Street Services and Urban Forestry Division guidelines.

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[177] State Planning and Zoning law (Government Code Section 65000, et seq.); Office of Planning and Research, State of California General Plan Guidelines; *Sequoyah Hills Homeowners Association v. City of Oakland.*

Table 9
Applicable Goals, Objectives, and Policies of the Framework Element

Goal, Objective, or Policy	Would the Project Conflict?
Land Use Chapter	
Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city. **Objective 3.1:** Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors	**No Conflict.** The Project would not affect existing residential uses, as it proposes both renovation and new construction on an approximately 25.84-acre urban infill site to provide a creative studio campus with sound stages, stage support uses, offices, post-production facilities, mill/shop areas, etc. The diversity of uses on the Project Site would support the employment and commercial needs of existing and future residents, businesses, and visitors in and around the Arts District and the region. In addition, the Project would incorporate sustainability features, landscaping, and secure access points to improve pedestrian travel. The Project Site is located in a City-designated transit priority area (TPA), a SCAG-designated High-Quality Transit Area (HQTA), and in close proximity to many bus transit lines and rail lines operated by Metro. As such, the Project would support the needs of existing and future residents, businesses, and visitors in a transit-oriented mixed-use neighborhood of the City. The Project would not conflict with this goal or with this objective.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution. **Policy 3.2.3:** Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**No Conflict.** The Project Site is located in an urban infill area well-served by public transit and an HQTA as designated by SCAG. The Project Site is also well served by a variety of public transit options, including local and regional bus lines and rail service. In particular the Project Site is located in the vicinity of Metro Local Bus Lines 18, 53, 60, 62, and 66 and Metro Rapid Line 720. The Project Site is also located approximately 0.8-mile from the Metro A Line Washington Station and 1.4 miles from the Metro L Line Little Tokyo/Arts District Station. The Project would also provide 58 bicycle parking spaces consisting of 25 short-term and 33 long-term spaces as well as four shower/ changing facilities, and would emphasize pedestrian access by including features such as wayfinding signage and lighting, safety lighting, separate pedestrian entrances and guard gates. Therefore, the Project would provide opportunities for the use of alternative modes of transportation, including access to public transit and opportunities for walking and biking, thereby promoting an improved quality of life and facilitating a reduction in vehicle trips, vehicle miles traveled, and air pollution. The Project would not conflict with this objective and policy.
Policy 3.10.4: Provide for the development of public streetscape improvements, where appropriate.	**No Conflict.** Of the 51 existing street trees, five trees would be removed and 46 street trees would be retained. The Project would plant 19 new street trees. As such, at buildout, a total of 65 trees would be located in the public right-of-way. In addition, the Project would comply with City conditions for new or relocated streetlights in order to maintain appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties. The Project would not conflict with this

Table 9 (Continued)
Applicable Goals, Objectives, and Policies of the Framework Element

Goal, Objective, or Policy	Would the Project Conflict?
	policy.
Policy 3.14.3: Promote the re-use of industrial corridors for small scale incubator industries. **Policy 3.14.4:** Limit the introduction of new commercial and other non-industrial uses in the existing commercial manufacturing zones to uses which support the primary industrial function of the location in which they are located.	**No Conflict.** Given that the Project Site is currently developed with light industrial uses, the Project's implementation of the Project's uses (i.e., studio sound stages, stage support uses, offices, post-production facilities, and mill/shop areas) would not result in a fragmented pattern of development. Also, the Project Site is located near the Arts District, where many of the former industrial and warehouse buildings have been redeveloped as incubator spaces, creative office, retail/restaurant, and live/work uses. Thus, the Project would continue the area's trend of re-using industrial lands while supporting the remaining industrial, warehouse, and commercial uses in the surrounding area. For these reasons, the Project would not conflict with these policies.
Goal 3L: Districts that promote pedestrian activity and provide a quality experience for the City's residents. **Objective 3.16:** Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.	**No Conflict.** The Project would provide street trees as well as open space and landscaping on-site to promote an enhanced pedestrian environment within the vicinity of the Project Site. The Project would renovate the existing Plant and vehicular maintenance building, and would position the eight new buildings along the perimeter of the Project Site. As such, a majority of the surface parking and all of the stage loading areas in the central area of the Project Site would be screened from public view. In addition, all proposed signage would be designed to be aesthetically compatible with the existing and proposed architecture of the Project Site and would comply with all LAMC and sign ordinances. As discussed above regarding Objective 3.2, the Project would include features such as wayfinding signage and lighting, safety lighting, separate pedestrian entrances and guard gates, that would enhance pedestrian activity within the Project Site. Additionally, as discussed above regarding Policy 3.10.4, the Project would comply with City conditions for new or relocated streetlights in order to maintain appropriate and safe lighting levels on both sidewalks and roadways that would enhance pedestrian activity and safety around the perimeter of the Project Site. Therefore, the Project would not conflict with this goal and objective.
Urban Form and Neighborhood Design Chapter	
Goal 5A: A liveable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.	**No Conflict.** The Project would introduce a new studio campus with landscaping within and along the perimeter of the Project Site. The industrial architecture of the Project would draw from elements of the surrounding Arts District neighborhood. The Project development would attract future investment and would contribute to a transit-oriented mixed-use neighborhood at both the local and citywide scale when considered together with the other mixed-use and commercial developments in the area. Therefore, the

Table 9 (Continued)
Applicable Goals, Objectives, and Policies of the Framework Element

Goal, Objective, or Policy	Would the Project Conflict?
	Project would not conflict with this goal.
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	**No Conflict.** The general area surrounding the Project Site is highly urbanized and industrial, with warehouses, distribution facilities, shops, and factories in a range of scales. Land uses immediately surrounding the Project Site include industrial uses to the north, west and east, industrial and retail uses and I-10 to the south, and a restaurant to the southwest. The Project would upgrade the quality of development within the Project Site by renovating two existing buildings, including the Plant, and adding eight new buildings to provide a creative studio campus. The Project would incorporate sustainability features, landscaping, and secure vehicular and pedestrian access points to improve security and enhance the pedestrian environment. In addition to the new parking structure, the Project would provide 58 bicycle parking spaces consisting of 25 short-term and 33 long-term spaces as well as shower/changing facilities. Additionally, as discussed above regarding Objective 3.2, the Project would include pedestrian features such as wayfinding signage and lighting, safety lighting, separate pedestrian entrances and guard gates that would enhance pedestrian activity within the Project Site. Additionally, as discussed above regarding Policy 3.10.4, the Project would provide the Project would comply with City conditions for new or relocated streetlights in order to maintain appropriate and safe lighting levels on both sidewalks and roadways that would enhance pedestrian activity and safety around the perimeter of the Project Site. The industrial architecture of the Project would draw from elements of the surrounding Arts District neighborhood. Overall, the uses and improvements proposed by the Project would enhance the quality of the Project Site and the area in the vicinity of the Project Site and the public realm. Therefore, the Project would not conflict with this objective.
Policy 5.8.4: Encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character.	**No Conflict.** Project signage would be designed to be aesthetically compatible with the architecture of the proposed Project buildings and would comply with all LAMC and sign ordinances. Proposed signage would include mounted Project identity signage, general ground-level and wayfinding pedestrian and vehicular signage, and security markings in compliance with code requirements. Wayfinding signs would be located at the parking garage entrances and exits, at building lobbies, on the interior-facing faces of stages, and on the ground level, which would be integrated into the overall design of the campus. Therefore, the Project would not conflict with this policy.
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	**No Conflict.** The Project would design building entrances and exits, open spaces, and pedestrian walkways to be open and in view of surrounding sites. The Project Site would also be enclosed by a fenced perimeter with gated entrances and

Table 9 (Continued)
Applicable Goals, Objectives, and Policies of the Framework Element

Goal, Objective, or Policy	Would the Project Conflict?
	guard booths. Pedestrian access to the Project Site would be provided via entrances along 8th Street. The Project would include several gated exit-only driveways and would have separate driveways and areas for trucks and delivery/loading, which would reduce the potential for conflicts with pedestrians. In addition, as discussed above, the Project would include proper lighting throughout the site and wayfinding signage in order to increase personal safety at all times of the day. Therefore, the Project would not conflict with this objective.
Open Space and Conservation Chapter	
Objective 6.1: Protect the City's natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City's natural resources to contribute to the sustainability of the region.	**No Conflict.** The Project is proposed for development on an infill site that is already paved and fully developed and therefore does not contain natural settings; only ornamental landscaping is located on the Project Site and only street trees line the perimeter of the Project Site. Therefore, the Project would not encroach into the City's natural settings and would not conflict with this objective. The Project would contribute to the City's natural resources by increasing the number of trees both on the Project Site and around the perimeter of the Project Site. Of the 122 existing trees located on-site, 28 would be relocated, 69 would be removed, and 25 trees would remain in place. The Project would plant 164 new on-site trees in accordance with requirements of the City of Los Angeles Landscape Ordinance 170,978. As such, at buildout, a total of 217 trees would be located onsite. Of the 51 existing street trees, five trees would be removed and 46 street trees would be retained. The Project would plant 19 new street trees. As such, following approval from the Bureau of Street Services and Urban Forestry Division, a total of 65 trees would be located in the public right-of-way at buildout.
Economic Development Chapter	
Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality. **Policy 7.2.3:** Encourage new commercial development in proximity to rail and bus transit corridors and stations.	**No Conflict.** The Project would renovate two existing buildings, including the Plant, and build eight new buildings to provide a creative studio campus comprising 832,190 square feet of floor area. As such, the Project would support this objective by providing uses to sustain the employment base of the Community Plan area, help meet employment needs of local residents, and foster continued economic investment. In addition, the Project Site's location in proximity to public transit, together with the Project's proposed bicycle parking and showers, encourage walking and biking, thereby facilitating a reduction in vehicle trips, VMT, and air pollution to ensure maximum feasible environmental quality. Therefore, the Project would not conflict with this objective and policy.

Table 9 (Continued)
Applicable Goals, Objectives, and Policies of the Framework Element

Goal, Objective, or Policy	Would the Project Conflict?
Infrastructure and Public Services Chapter	
Goal 9A: Adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.	**No Conflict.** As discussed under Checklist Question XIX, below, wastewater collection and treatment facilities would be able to adequately serve the Project.
Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.	**No Conflict.** Wastewater generated by the Project would be typical of commercial, office, and restaurant uses. As described in Checklist Question No. IX, the Project would use typical but potentially hazardous materials, including those used for movie and television production, set making, general maintenance/cleaning, and landscaping. However, activities involving the handling and disposal of hazardous wastes would occur in compliance with all applicable federal, state, and local requirements. In addition, as discussed under Checklist Question No. X, the Project would not violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface water quality. Furthermore, as discussed in Section 2, Project Description, of this IS/MND, and under Checklist Question No. XIX.b, the Project would include water conservation features to reduce water usage which would in turn reduce wastewater flows. Therefore, the Project would not conflict with this policy.
Goal 9B: A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations. **Objective 9.6:** Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality	**No Conflict.** As evaluated above under Checklist Question No. X, the Project would implement BMPs to minimize the discharge of pollutants in stormwater runoff during construction. During operation, the Project would implement LID strategies to manage stormwater runoff in accordance with the current City of Los Angeles LID Ordinance requirements. The Project would not conflict with this goal and objective.
Goal 9C: Adequate water supply, storage facilities, and delivery system to serve the needs of existing and future residents and businesses. **Objective 9.10:** Ensure that water supply, storage, and delivery systems are adequate to support planned development.	**No Conflict.** As evaluated below for Checklist Question Nos. XIX.a and XIX.b, based on the Project's Water Supply Assessment, LADWP would be able to meet the water demand of the Project as well as the existing and planned future water demands of its service area. Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. Thus, the Project would not conflict with this goal and objective.
Goal 9F: Adequate collection, transfer and disposal of mixed solid waste—the City shall seek to ensure that all mixed solid waste that cannot be reduced, recycled or composted is collected, transferred and disposed of in a manner than	**No Conflict.** The Project would provide adequate space for trash and recycling receptacles in order to ensure safe and efficient handling of solid waste. The Project would contract with a private trash hauler that would remove the waste from the building, and the Project would have adequate capacity to handle all trash collection. Therefore, the Project would

Table 9 (Continued)
Applicable Goals, Objectives, and Policies of the Framework Element

Goal, Objective, or Policy	Would the Project Conflict?
minimizes adverse environmental impacts.	not conflict with this goal.
Goal 9P: Appropriate lighting required to: (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and informational lighting such as building façade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.	**No Conflict.** All Project lighting would comply with current energy standards and codes, while at the same time providing efficient and effective daytime and nighttime on-site signage and lighting for safety and wayfinding that minimizes or prevents light pollution, light trespass and glare. Low-level exterior lights would be provided to accent signage, on-site production display signage, architectural features, and landscaping elements. In addition, low-level exterior lights would be located adjacent to the proposed buildings, along pathways, in and around the parking structure and the Project Site perimeter for aesthetic, security, and wayfinding purposes. Light sources would be shielded and/or directed toward the Project Site to minimize light spill to neighboring buildings and surrounding areas, and to reduce sky-glow and to improve nighttime visibility. In addition, the new buildings would include limited use of glass and would be surrounded by landscaping 10 feet above grade such that there would be no potential reflectiveness that could affect any cars and pedestrians at the ground level. Therefore, the Project would not conflict with this goal.
Source: Eyestone Environmental, 2021.	

The Project would be consistent with, and not conflict with, the relevant objectives and policies that support the goals of the Framework Element's Economic Development Chapter by creating a studio campus that would foster continued economic investment and employment opportunities.

The Project would be consistent with the relevant objectives and policies that support the goals of the Framework Element's Infrastructure and Public Services Chapter, which calls for monitoring service demands and forecasting the future need for infrastructure improvements and implementing techniques that reduce demands on utility infrastructure or services, where appropriate. Specifically, as discussed below in Checklist Question No. XV, the City's fire protection, police protection, school, library, and parks/recreation services and facilities would be able to adequately serve the Project's demand for these services. In addition, as discussed below in Checklist Question No. XIX there would be adequate supplies and infrastructure capacity to serve the water, wastewater, electricity, and natural gas demands of the Project. There also would be adequate landfill capacity to accommodate the Project's solid waste generation during construction and operation.

The Transportation Chapter of the Framework Element is now implemented through Mobility Plan 2035. Refer to Checklist Question No. XVII.a for a detailed analysis of the Project's consistency with Mobility Plan 2035.

In summary, as detailed in Table 9 on page 139, the Project would not conflict with the relevant goals, objectives, and policies of the Framework Element adopted for the purpose of avoiding or mitigating adverse environmental effects, and no mitigation measures would be required.

Central City North Community Plan

The Project Site is located within an area designated as Industrial by the Central City North Community Plan. Specific policies of the Central City North Community Plan apply to land uses, residential development, industrial development, maximum efficiency and accessibility of the commercial sector, and public and institutional land use. The Project's consistency with these policies is set forth in Table 10 on page 146. As discussed therein, the Project would be not conflict with the applicable objectives and policies of the Community Plan adopted for the purpose of avoiding or mitigating an environmental effect.

Los Angeles Municipal Code

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

The Project would remove three ancillary structures (including an existing guard house, a canopy, and a drum storage building), and replace a portion of the existing surface parking with eight new buildings, including three sound stage buildings with attached support/office uses, a shops/office building, three guard booths, and a nine-level above-ground parking structure. Additionally, the Project would retain and renovate the existing Plant building to provide 11 sound stages, stage support uses, offices, post-production facilities, mill/shop areas, food services, and a fitness/health center. The Project would also renovate the existing maintenance building to house grip and lighting uses. Upon completion of the renovation and new construction, the Project would result in up to 832,190 square feet of floor area and a floor area ratio (FAR) of up to 0.74:1.

The Project Applicant also seeks the approval of a Vesting Tentative Tract Map for a merger and subdivision resulting in two ground lots and three airspace lots, and to remove two street trees along 8th Street and three street trees along Hunter Street; a Site Plan review; a Conditional Use Permit for a Major Development Project for the proposed renovation and new construction; and a Major Conditional Use Permit to allow the sale and/or dispensing of a full line of alcoholic beverages for on-site consumption.

The Project Applicant is also requesting that the Project be relieved of the following required dedications and improvements through the approval of the Vesting Tentative Tract Map: 3 feet dedication along 8th Street to provide half right of way width of 33 feet and all roadway modification requirements; 8 feet dedication along Lemon Street to provide half right of way width of 33 feet and all roadway modification requirements; 1 foot dedication along Lawrence Street to provide half right of way width of 33 feet and all roadway modification requirements; 1 foot dedication along Hunter Street to provide half right of way width of 33 feet and all roadway modification requirements; removal and replacement of all non-standard sidewalks along Project frontages; and roadway modification requirements along Alameda Street and

Table 10
Applicable Goals, Objectives, and Policies of the Central City North Community Plan

Goal, Objective, or Policy	Would the Project Conflict?
Commercial	
Policy 2-2.2: New development needs to add to and enhance the existing pedestrian street activity.	**No Conflict.** The Project would convert the Project Site into a creative studio campus. The Project would enhance the existing pedestrian street activity by planting 19 new street trees along the perimeter of the Project Site while retaining 46 existing street trees. In addition, the Project would comply with City conditions for new or relocated streetlights in order to maintain appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties. New buildings would include limited use of glass and would be surrounded by landscaping 10 feet above grade such that there would be no potential reflectiveness that could affect any cars and pedestrians at the ground level. The Project Site's proximity to various public transit options and nearby commercial and offices uses would also promote walkability. The Project would not conflict with this policy.
Industrial	
Goal 3: Sufficient land for a variety of industrial uses with maximum employment opportunities which are safe for the environment and the work force and which have minimal adverse impact on adjacent uses. **Objective 3-1:** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community. **Policy 3-1.1:** Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.	**No Conflict.** This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The Project Site is immediately north of I-10 and approximately 0.4 mile west of the Los Angeles River. The area surrounding the Project Site is highly urbanized and largely industrial, with warehouses, distribution facilities, shops, and factories in a range of scales. Some mixed-use and commercial properties are also present. Land uses immediately surrounding the Project Site include industrial uses to the north, west and east, industrial and retail uses and I-10 to the south; and a restaurant to the southwest. Food warehouses and clothing manufacturing facilities are prominent. Although the Project would introduce a new commercial use on the Project Site, the area surrounding the Project Site would remain an industrial zone that is developed with a mixture of commercial uses. Therefore, the Project would not conflict with this goal, objective, and policy.
Policy 3-1.2: Adequate compatibility should be achieved through design treatments, compliance with environmental protections standards and health and safety requirements for industrial uses where they adjoin neighborhoods and commercial uses. **Policy 3-1.3:** Require that any proposed development be designed to enhance and be compatible with adjacent development.	**No Conflict.** The Project would be designed to reflect the industrial architecture of the surrounding neighborhood. The Project would retain and repurpose the largest building on the Project Site, the Plant, as well as the maintenance building, and therefore would continue the area trend of re-using industrial lands, while remaining compatible with the industrial, warehouse, and commercial uses in the surrounding area. The Project's use of building materials such as glass, metal, masonry, and concrete for the new construction would also blend with the Arts District's industrial context. The Project would not conflict with these policies.

Table 10 (Continued)
Applicable Goals, Objectives, and Policies of the Central City North Community Plan

Goal, Objective, or Policy	Would the Project Conflict?
Police Protection	
Policy 8-2.2: Ensure that landscaping around buildings be placed so as not to impede visibility.	**No Conflict.** To facilitate police response in the event of an emergency, the Project would be designed with landscaping that would not impede visibility. The Project would also provide clear access points for entry and exit. The Project would not conflict with this policy.
Policy 8-2.3: Ensure adequate lighting around residential, commercial, and industrial buildings in order to improve security.	**No Conflict.** Project lighting would include low-level exterior lighting on the buildings, in doorways and entrances, along pathways and in and around the parking structure for security and wayfinding purposes. The Project would provide all new street and pedestrian lighting within the public right-of-way that would comply with applicable City regulations and would be approved by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties. As such, the Project would include adequate lighting to improve security within the Project Site. The Project would not conflict with this policy.
Fire Protection	
Policy 9-1.1: Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.	**No Conflict.** As provided in Checklist Question No. XV.a, of this Draft MND, the Project has been reviewed by LAFD and LAFD has determined that fire projection services for the Project would be adequate. Compliance with applicable Building and Fire Code requirements would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection, as set forth in LAMC Section 57.118, prior to the issuance of a building permit.
Transportation	
Goal 12: Encourage alternative modes of transportation to the use of single occupant vehicles (SOV) in order to reduce vehicular trips. **Objective 12-1:** To pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips.	**No Conflict.** The Project Site is located in an urban setting that is well served by a variety of public transit options, including local and regional bus and rail lines. In particular, the Project Site is located in the vicinity of Metro Local Bus Lines 18, 53, 60, 62, and 66 and Metro Rapid Line 720. The Project Site is also located approximately 0.8-mile from the Metro A Line Washington Station and 1.4 miles from the Metro L Line Little Tokyo/Arts District Station. The Project would provide 58 bicycle parking spaces consisting of 25 short-term and 33 long-term spaces, as well as four shower/ changing facilities. These locational features of the Project Site and design features of the Project would reduce the use of SOV and vehicle miles traveled (VMT), as discussed under Checklist Question No. XVII, Transportation, below. Additionally, the Project would encourage walking as an alternative mode of transportation by retaining 46 existing street trees and planting 18 new street trees and by providing all new street and pedestrian lighting within the public right-of-way, as described with regard to Policy 8-2.3, above. Therefore, the Project would support the reduction of SOV vehicle trips and VMT, and would not conflict with this

Table 10 (Continued)
Applicable Goals, Objectives, and Policies of the Central City North Community Plan

Goal, Objective, or Policy	Would the Project Conflict?
	goal and objective.
Policy 12-1.1: Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex time, bicycles, and walking, etc.). **Policy 12-1.3:** Require that proposals for major new non-residential development projects include submission of a TDM Plan to the City.	**No Conflict.** As detailed in Section XVII, Transportation, of this Draft MND, the Project would implement a TDM measures to promote non-auto travel and reduce the use of single-occupant vehicle trips, including bicycle parking facilities, a bicycle repair station, and shower facilities for cyclists. The Project would not conflict with these policies.
Non-Motorized Transportation	
Goal 13: A system of safe, efficient and attractive bicycle and pedestrian facilities. **Policy 13.1.4:** Encourage the provision of changing rooms, showers, and bicycle storage at new and existing and non-residential developments and public places.	**No Conflict.** The Project would include a separate pedestrian entry with a separate guard booth for pedestrian safety, and would also include a closed circuit camera system, keycard entry, and proper lighting of buildings, including doorways and entrances, the parking structure, and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. The Project would also include separate driveways for truck ingress and egress, which would reduce the potential for conflicts with pedestrians. The Project would also provide sufficient lighting of parking areas and the parking structure to maximize visibility and reduce areas of concealment. Furthermore, the Project would design building entrances and exits, open spaces, and pedestrian walkways to be open and in view of surrounding sites. In addition, the Project would provide 58 bicycle parking spaces consisting of 25 short-term and 33 long-term spaces, as well as four shower/changing facilities, to encourage and facilitate bicycle use. The Project would not conflict with this goal and policy.
Historic and Cultural Resources	
Objective 17-1: Ensure that the Community's historically significant resources are protected, preserved, and/or enhanced.	**No Conflict.** As detailed in Checklist Question No. V, Cultural Resources, of this IS/MND, the Historic Resources Technical Report prepared for the Project concluded that the Plant is not eligible for listing under federal, state, or local designation criteria, and therefore does not meet the definition of a historical resource under CEQA. In addition, the Project would not result in indirect impacts on nearby historic resources. As such, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. The Project would not conflict with this objective.

Source: Eyestone Environmental, 2021.

Olympic Boulevard. With approval of such requests, the Project would not conflict with this provision of the LAMC or the Mobility Plan.

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

River Implementation Overlay District

The Project Site is located within the boundaries of the RIO District and would therefore be required to comply with the Los Angeles River Design Guidelines, which establish best practices for designing development projects located within the RIO District. The Los Angeles River Design Guidelines illustrate options, solutions, and techniques to improve the aesthetic quality of the Los Angeles River and river-adjacent development.[178] Although the Project is located within the boundaries of the RIO District, the Project Site is located approximately 0.43 mile west of the Los Angeles River and is separated from the Los Angeles River by existing roads, buildings and rail tracks. Nevertheless, the Project would support the relevant Objective 2 of the Los Angeles River Guidelines, which calls for employing high quality, attractive and distinguishable architecture and designing the Project in substantial compliance with the Citywide Design Guidelines, as detailed above in Checklist Question No. I.c. Therefore, the Project would not conflict with the RIO District or with the Los Angeles River Design Guidelines.

Citywide Urban Design Guidelines

The Citywide Design Guidelines, adopted October 24, 2019, establish ten guidelines to carry out the common design objectives intended to maintain neighborhood form and character while promoting quality design and creative infill development solutions. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. As evaluated above in detail in Section I.c, Aesthetics, of this IS/MND, the Project would not conflict with the Citywide Design Guidelines adopted for the purpose of avoiding or mitigating an environmental effect.

SCAG Regional Transportation Plan/Sustainable Communities Strategy

SCAG is the federally designated Metropolitan Planning Organization for six Southern California counties, including the County of Los Angeles. As such, SCAG is mandated to create regional plans that address transportation, growth management, hazardous waste management, and air quality. On September 3, 2020, the SCAG Regional Council adopted the 2020–2045 RTP/SCS, also known as Connect SoCal. The 2020–2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region that includes Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020–2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. SCAG's overarching strategy for achieving its goals is the integration of land use and transportation. SCAG policies are directed toward the development of regional land use patterns that contribute to reductions in single occupancy vehicle use and vehicle miles traveled and improvements to the transportation system. Rooted in past RTP/SCS plans, Connect SoCal's "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by

[178] City of Los Angeles Department of City Planning, Los Angeles River Design Guidelines, July 29, 2015; Urban Design Studio, www.urbandesignla.com/resources/RiverDesignGuidelines.php, accessed August 16, 2021.

co-locating housing, jobs, and transit, and increasing investment in transit and in "complete streets."[179] As detailed in Table 11 on page 151, the Project would not conflict with the applicable goals set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2020–2045 RTP/SCS to maximize the productivity of the region's transportation system as well as protect the environment and health of the region's residents through its location on an urban site in a TPA in close proximity to mass transit option, thereby minimizing vehicle miles traveled. In addition, the Project would provide bicycle parking spaces and shower facilities that would serve to promote walking and use of bicycles. In addition, of the Project's 1,522 parking spaces, 153 spaces would provide Electric Vehicle Charging Stations (EVCS) and 304 spaces would be prewired to accommodate the placement of future EVCS. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation.

Based on the analysis provided above, the Project would not conflict with the applicable goals, policies, and objectives in local and regional plans that were adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the Project would not conflict with relevant environmental policies in applicable plans. As such, Project impacts with respect to Checklist Question No. XI.b would be less than significant, and no mitigation measures are required.

[179] As defined in SCAG 2020–2045 RTP/SCS, p. 101, complete streets are streets designed and operated to enable safe access for all roadway users of all ages and abilities, including pedestrians, bicyclists, motorists and transit riders. Complete Streets strategies can include traffic calming, bicycle priority streets (bicycle boulevards) and pedestrian connectivity to increase physical activity, improve connectivity to the regional bikeway/greenway networks, local businesses and parks.

Table 11
Applicable Goals of SCAG 2020–2045 RTP/SCS

2020–2045 RTP/SCS Goals	Would the Project Conflict?
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods. **Goal 4:** Increase person and goods movement and travel choices within the transportation system	**No Conflict.** Although these goals apply at a regional level, the Project would be developed on a currently developed Project Site located in an existing urbanized area with an established network of roads and freeways that provides local and regional access, including to the Project Site. The availability and accessibility of public transit in the Project Site area is confirmed by the Project Site's location within a City-designated TPA and a SCAG-designated HQTA. The Project Site area is served by Metro Local Bus Lines 18, 53, 60, 62, and 66 and Metro Rapid Line 720. The Project Site is also located approximately 0.8 mile from the Metro A Line Washington Station and 1.4 miles from the Metro L Line Little Tokyo/Arts District Station. In addition, the Project would provide 58 bicycle parking spaces (33 long-term, 25 short-term), along with shower facilities, and the Project would meet the City Green Building Code Requirements for parking facilities equipped with EV charging stations and those capable of supporting future EVSE. The Project also includes multiple pedestrian-friendly features both within the Project Site and along its perimeter, including wayfinding signage and lighting, safety lighting, separate pedestrian entrances and guard gates. Given the Project Site's location in proximity to a variety of transportation options, the Project would maximize mobility, accessibility, and overall productivity of the transportation system by providing various opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking. With respect to safety, as discussed in Checklist Question No. XVII, the roadways adjacent to the Project Site are part of the existing urban roadway network and contain no sharp curves or dangerous intersections. The Project Site is located in a highly urbanized area that is already developed with roadways and infrastructure. All access and circulation associated with the Project would be designed and constructed in conformance with all applicable requirements established by the City's Department of Building and Safety, the LAFD, and the LAMC. The Project would not include any new roads that would result in an increase in hazards due to a design feature, and the Project's driveways would be designed according to LADOT standards. In addition, the Project would not result in incompatible uses as the proposed commercial uses are consistent with the increasingly mixed-use developments in the vicinity of the Project Site. Furthermore, during construction, the Project would prepare and implement a Construction Management Plan to minimize potential impacts to the surrounding area related to construction trucks, construction worker parking, and any possible sidewalk or lane closures and to ensure safe passage for all modes of travel during

Table 11 (Continued)
Applicable Goals of SCAG 2020–2045 RTP/SCS

2020–2045 RTP/SCS Goals	Would the Project Conflict?
	Project construction. In addition, during operation, landscape design will ensure there will be no impediments to visibility of and by vehicles, bicycles and pedestrians. Moreover, the Project would result in less-than-significant impacts with respect to VMT and conflicts with programs, plans, policies, and ordinances addressing the circulation system. Therefore, the Project would not conflict with these goals.
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.	**No Conflict.** Although this goal applies at the regional level, the Project would not conflict with its implementation. As detailed under Checklist Question No. XVI, the Project would result in less-than-significant impacts with respect to conflicts with programs, plans, policies, and ordinances addressing the circulation system; VMT; and hazardous geometric design features. As discussed above, a Construction Management Plan would be implemented to ensure that adequate and safe access is available within and near the Project Site. Appropriate construction traffic control measures (e.g., signs, flag persons, etc.) would also be utilized to ensure that emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. During operation, the Project would not substantially increase hazards due to a geometric design feature or incompatible use. Therefore, the Project would not adversely affect the security and preservation of the regional transportation system, and the Project would not conflict with this goal.
Goal 5: Reduce greenhouse gas emissions and improve air quality. **Goal 6:** Support healthy and equitable communities. **Goal 7:** Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**No Conflict.** As evaluated under Checklist Question No. III, the Project would result in less-than-significant impacts related to air quality during construction and operation. As evaluated under Checklist Question No. VIII, Project impacts with respect to GHG emissions would be less than significant. As also discussed therein, the Project would comply with Los Angeles Green Building Code and CALGreen standards. Specific project design features to further support and promote environmental sustainability would include, but would not be limited to: EVCS; use of solar panels on a portion of Building 1; material recycling stations; efficient HVAC systems; energy-efficient wall insulation and glazing units; high efficiency dual-flush toilets with a flush volume of 1.28/1.1 gallons per flush, or less, high efficiency hybrid urinals, showerheads with a flow rate of 1.5 gallons per minute or less, and drip irrigation systems to promote reductions in indoor and outdoor water usage; Energy Star–labeled appliances; and water-efficient landscape design. In addition, the Project would provide domestic water heating systems located in close proximity to point(s) of use and individual metering and billing for water use. These measures are intended to

Table 11 (Continued)
Applicable Goals of SCAG 2020–2045 RTP/SCS

2020–2045 RTP/SCS Goals	Would the Project Conflict?
	reduce GHG emissions, conserve water and energy, and improve air quality. The Project would be developed on a currently developed Project Site located within an existing urbanized area with an established transportation network of roads, freeways, and transit that provides local and regional access to the area, including the Project Site. Specifically, the Project is an infill development within an existing urbanized area that would introduce employment within a SCAG-designated HQTA. As discussed above, the Project Site area is served by bus lines operated by the LADOT, including Metro Local Lines 18, 53, 60, 62, and 66 and Metro Rapid Line 720. The Project would also promote bicycle use through the provision of 58 bicycle parking spaces (33 long-term, 25 short-term) and shower facilities. The Project also includes multiple pedestrian-friendly features both within the Project Site and along its perimeter, including pedestrian-friendly features such as wayfinding signage and lighting, safety lighting, separate pedestrian entrances and guard gates. In addition, the Project would provide landscaping and trees throughout the site and streets to provide a pedestrian-friendly environment. Of the 122 existing trees located on-site, 28 would be relocated, 69 would be removed, and 25 trees would remain in place, and the Project would plant 164 new trees on-site. As such, at buildout, a total of 217 trees would be located on-site. Of the 51 existing street trees, five trees would be removed and 46 street trees would be retained, and the Project would plant 19 new street trees. As such, at buildout, a total of 65 trees would be located in the public right-of-way. The Project would comply with provisions of the City's Urban Forestry Division and the Protected Trees and Shrubs Ordinance. Therefore, the Project would support healthy and equitable communities by improving air quality and encouraging active transportation. The Project would support the reduction of vehicle miles traveled and dependency on single-occupancy vehicles. As such, the Project would not conflict with the region's adaptation to a changing climate and would support an integrated regional development pattern and transportation network. Therefore, the Project would not conflict with these goals.
Goal 8: Leverage new transportation technologies and data-driven solutions that results in more efficient travel.	**No Conflict.** As discussed above, the Project would promote non-auto travel and reduce single-occupant vehicle trips by being located in a transit-rich area, providing bicycle parking and showers, and improving the pedestrian environment. The Project would also provide parking spaces that are equipped with EVCS and parking spaces prewired to support future EVCS. Therefore, the Project would not conflict with this goal.

Table 11 (Continued)
Applicable Goals of SCAG 2020–2045 RTP/SCS

2020–2045 RTP/SCS Goals	Would the Project Conflict?
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats.	**No Conflict.** The Project Site is located in an urbanized area and is currently developed with a Los Angeles Times printing plant, vehicular maintenance building, ancillary buildings, and surface parking. Existing landscaping within the Project Site includes 122 on-site trees and 51 street trees. None of the 122 on-site trees is considered to be protected by the City of Los Angeles Tree Preservation Ordinance No. 186873. All 51 of the street trees are considered to be protected by the City of Los Angeles' Protected Tree and Shrubs Ordinance No. 186873. Of the 51 existing street trees, five trees would be removed and the 46 street trees to be retained would be maintained and protected during construction of the Project. The Project would utilize standard tree protection practices and conform to all relevant tree removal/replacement measures in accordance with City regulations.[a] No riparian or other sensitive natural community exists on-site, and no agricultural uses or operations occur on-site or in the vicinity. The Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Department of Conservation. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles. Accordingly, development of the Project would not preclude the conservation of natural and agricultural lands and restoration of habitats. Thus, the Project would not conflict with this goal.

[a] *If it is subsequently determined that it is not feasible to maintain these trees (e.g., due to changes in project design or access), removal of those trees would be required to comply with the City's street tree removal procedures, and replacement trees would be required to be provided in conformance with the City's current guidelines and policies.*

Source: Eyestone Environmental, 2021.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

a. Would the project 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?

No Impact. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.[180,181,182] The Project Site is also not located within a City-designated oil field or oil drilling area.[183] Therefore, the Project would not create any impact regarding the loss of availability of a mineral resource or a mineral resource recovery site, and no mitigation measures would be required.

b. Would the project 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. See Response to Checklist Question No. XII.a, Mineral Resources, above.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

[180] City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

[181] State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

[182] City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

[183] City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit E, November 26, 1996, p. 55.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. For a project located within the vicinity of a private airstrip or 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?	☐	☐	☐	☒

The analysis below is based, in part, on the noise calculation worksheets for the Project included as Appendix IS-10 of this IS/MND.

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact.

Applicable Noise Regulations

Chapter XI, *Noise Regulation*, of the LAMC (hereafter referred to as the Noise Regulations) establishes acceptable ambient sound levels to regulate intrusive noises (e.g., noise from stationary mechanical equipment, amplified sound, and vehicles other than those traveling on public streets) within specific land use zones. In accordance with the Noise Regulations, a noise level increase from certain regulated noise sources (e.g., mechanical equipment) of 5 dBA over the existing ambient noise level at an adjacent property line is considered a violation of the Noise Regulations. To account for people's increased tolerance for short-duration noise events, the Noise Regulations provide a 5-dBA allowance (for a total of 10 dBA[184] above the existing ambient noise level) for noise sources occurring for more than 5 but less than 15 minutes in any 1-hour period, and an additional 5-dBA allowance (for a total of 15 dBA above the existing ambient noise level) for noise sources occurring for five minutes or less in any 1-hour period.[185]

Ambient noise is defined by the Noise Regulations as the measured noise level averaged over a period of at least 15 minutes (i.e., L_{eq}).[186,187] For purposes of determining whether or not a violation of the Noise

[184] A-weighted decibels, abbreviated dBA, are an expression of the relative loudness of sounds in air as perceived by the human ear. All sound levels measured in decibel (dB or dBA), as identified in the noise calculation worksheets included in Appendix IS-10 of this IS/MND, are relative to $2x10^{-5}$ N/m^2. Caltrans, Technical noise Supplement (TeNS), September 2013, Chapter 2.1.3.2, https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf

[185] Los Angeles Municipal Code, Chapter XI, Article I, Section 111.02-(b), https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-193741.

[186] Los Angeles Municipal Code, Chapter XI, Article I, Section 111.01(a), https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-193741.

[187] Equivalent Sound Level (L_{eq}) is a measurement of the acoustic energy content of noise averaged over a specified time period. Thus, the L_{eq} of a time-varying sound and that of a steady sound are the same if they deliver the same amount of

(Footnote continued on next page)

Regulations is occurring, the sound level measurements of the additional noise source are averaged over a minimum 15-minute duration and compared with the baseline ambient noise levels (i.e., without the additional noise source). The ambient noise baseline to be used is either the actual measured ambient noise level or the City's presumed ambient noise level, whichever is greater. In cases in which the actual measured ambient noise level is unknown, the City's presumed ambient noise level is used as the baseline. The City's presumed daytime (7:00 A.M. to 10:00 P.M.) and nighttime (10:00 P.M. to 7:00 A.M.) minimum ambient noise levels for the M3 zone is 65 dBA and 65 dBA, respectively.[188] In addition, the City's presumed daytime and nighttime minimum ambient noise levels for residential zones (the focus of the impact analysis below) are 50 dBA and 40 dBA, respectively.[189]

Noise due to construction is regulated under Section 41.40 of the LAMC, which prohibits construction noise between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, on Saturday before 8:00 A.M. and after 6:00 P.M., and at any time on Sunday or a national holiday.[190] In addition, Section 112.05 of the LAMC limits noise from construction equipment located within 500 feet of a residential zone to 75 dBA (between 7:00 A.M. and 10:00 P.M.), measured at a distance of 50 feet from the source, unless compliance with this limitation is technically infeasible.[191]

Noise due to motor driven vehicles on private property (e.g., parking lot) is regulated under Section 114.02 of the LAMC. In accordance with Section 114.02, the operation of motor driven vehicles upon any property within the City that causes the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than 5 dBA is considered a noise violation.

Noise due to vehicle theft alarm systems (car alarms) is regulated under Section 114.06 of the LAMC, which states that "it shall be unlawful for any person to install, operate or use any vehicle theft alarm system that emits or causes the emission of an audible sound, which is not, or does not become, automatically and completely silenced within five minutes."

In addition to the Noise Regulations, the Noise Element of the City of Los Angeles General Plan (General Plan) Exhibit I establishes CNEL guidelines for land use compatibility.[192] As discussed below, this analysis focuses on potential impacts to sensitive receptors. Within the Project vicinity, the closest sensitive receptors are the potential future mixed-use projects that include residential uses. Per the Noise Element, noise levels between 70 and 75 dBA CNEL are considered "normally unacceptable" and noise

(Footnote continued from previous page)

energy to the receptor's ear during exposure. Caltrans, Technical noise Supplement (TeNS), September 2013, Table 2-11, https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf.

188 Los Angeles Municipal Code, Chapter XI, Article I, Section 111.03, https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-193741.

189 Los Angeles Municipal Code, Chapter XI, Article I, Section 111.03. https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-193741.

190 Los Angeles Municipal Code, Section 41.40, https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-128777#JD_41.40.

191 In accordance with the City of Los Angeles Noise Regulations (Los Angeles Municipal Code, Section 112.05), "technically infeasible" means that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.

192 Noise Element of the Los Angeles City General Plan, adopted February 3, 1999, https://planning.lacity.org/odocument/b49a8631-19b2-4477-8c7f-08b48093cddd/Noise_Element.pdf.

levels at 75 dBA CNEL and greater are considered “clearly unacceptable” for residential uses. Noise levels between 55 and 70 dBA CNEL are considered “conditionally acceptable" and noise levels less than 55 dBA CNEL are considered “normally acceptable” for single-family residential uses.

Construction of the Project is anticipated to require approximately 34 months to complete. While the Noise Regulations limit noise from construction equipment located within 500 feet of a residential zone to 75 dBA, as measured at 50 feet from the source, as described above, there are no residential uses within 500 feet of the Project Site. As discussed and described in Section 2, Project Description, the Project proposes commercial uses on a Project Site with existing commercial uses and in an area with commercial and industrial uses.

As stated above, a significant impact would occur if the Project would result in a substantial temporary or permanent increase in ambient noise levels. With respect to the community noise assessment, changes in noise levels of less than 3 dBA are generally not discernable to most people, while changes greater than 5 dBA are readily noticeable and would be considered a significant increase. Therefore, the City has determined to assess the significance of the Project’s construction noise based on whether Project construction creates an increase in the ambient exterior noise levels of 5 dBA (hourly L_{eq}) or more at a noise-sensitive use (see below discussion for definition of noise-sensitive use).

With respect to on-site operational noise, the significance criteria used in the noise analysis is an increase in the ambient noise level of 5 dBA (hourly L_{eq}) at the noise-sensitive uses, in accordance with the Noise Regulations. The Noise Regulations do not apply to off-site traffic (i.e., vehicles traveling on public roadways). Therefore, the City has determined to assess the significance of the Project’s off-site traffic noise based on whether the Project creates, or contributes to, an increase in the ambient noise level of 3 dBA in CNEL if the noise levels fall within the “normally unacceptable” or “clearly unacceptable” category, as specified in the City’s Noise Element, or an increase of 5 dBA in CNEL if the noise levels fall within the “conditionally acceptable” or “normally acceptable” category at noise-sensitive uses. In addition, the City has determined to assess the significance of the Project’s composite noise levels (on-site and off-site sources) based on whether the Project’s composite noise levels create an increase in the ambient noise level of 3 dBA or 5 dBA in CNEL (depending on where in the acceptable/unacceptable categories the noise levels fall) at noise-sensitive uses.

Existing Noise Environment

Some land uses are considered more sensitive to noise than others based on the types of activities typically involved at the receptor location. Similarly, the Noise Element defines noise-sensitive land uses as single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodging, and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves; and parks.[193] Based on a review of the land uses in the Project Site area, there are no noise sensitive uses within 500 feet of the Project Site. However, there are two potential future noise sensitive uses (i.e., mixed-use developments with residential uses) located at the northwest corner of Alameda Street and Bay Street (approximately 770 feet from the northwest corner of the Project Site) and at the northeast

[193] City of Los Angeles General Plan, Noise Element, Chapter IV, Page 4-1, https://planning.lacity.org/odocument/b49a8631-19b2-4477-8c7f-08b48093cddd/Noise_Element.pdf.

corner of Mateo Street and Sacramento Street (approximately 835 feet from the northeast corner of the Project Site), both of which are more than 500 feet from the Project Site. The locations of these two potential future noise-sensitive receptors are identified in Figure 25 on page 160 as R1 and R2, and described in Table 12 on page 161.

As described in Appendix IS-10, ambient noise measurements were taken at the two potential future mixed-use locations on Tuesday, April 6, 2021. Two 15-minute measurements were conducted at each of the off-site receptor locations, one during the daytime hours between 1:00 P.M. and 3:00 P.M. and one during the nighttime hours between 10:00 P.M. and 12:00 A.M. The ambient noise measurements were taken in accordance with the City's standards, which require ambient noise to be measured over a period of at least 15 minutes.[194]

The results of the ambient sound measurement data are summarized in Table 12. As indicated in Table 12, the existing daytime ambient noise levels at the potential future receptor locations range from 69.2 dBA (L_{eq}) at potential future receptor location R1 to 69.5 dBA (L_{eq}) at potential future receptor location R2. The nighttime ambient noise levels ranged from 61.2 dBA (L_{eq}) at potential future receptor location R2 to 65.4 dBA (L_{eq}) at potential future receptor location R1. Based on field observation and measured sound data, the current ambient noise environment in the vicinity of the Project Site is controlled primarily by vehicular traffic on local roadways (i.e., Alameda Street, Mateo Street, Sacramento Street) and industrial noise sources. Consistent with LAMC procedures, the measured existing ambient noise levels are used as the baseline conditions for the purposes of determining Project impacts.

Construction Noise

Construction noise impacts due to on-site construction activities associated with the Project were evaluated by calculating the construction-related noise levels at the closest future potential sensitive receptor locations and comparing these estimated construction-related noise levels to the existing ambient noise levels (i.e., noise levels without construction noise from the Project). Construction noise associated with the Project was projected based on the noise expected to be generated by the different types of Project construction activities anticipated, calculating the anticipated noise levels to be produced by the mix of the Project's construction equipment assumed for all construction activities at the two future potential sensitive receptor locations, construction durations, and construction schedule. Project construction is anticipated to span 34 months (from June 2023 through April 2026). Project construction activities would comply with LAMC Section 41.40, which limits construction to the hours of 7:00 A.M. to 9:00 P.M. Monday through Friday, 8:00 A.M. to 6:00 P.M. on Saturday, and no construction activities on Sunday or a national holiday.

On-Site Construction

As reported in Appendix IS-10 of this IS/MND, the individual pieces of construction equipment anticipated to be used for Project construction produce maximum noise levels of 74 dBA to 90 dBA at a reference distance of 50 feet from the noise source, as shown in Table 13 on page 162. The construction equipment noise levels at a distance of 50 feet (Referenced Maximum Noise Levels) are based on the Federal Highway Administration (FHWA) Roadway Construction Noise Model User's Guide (RCNM,

[194] LAMC Section 111.01, https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-193741.

Figure 25
Noise Monitoring Locations

Source: AES, 2021.

Table 12
Existing Ambient Noise Levels

Potential Future Receptor Location	Approximate Distance to Project Site[a] (feet)	Measured Noise Levels, dBA L_{eq}		CNEL[c] (dBA)
		Daytime Hours[b] (7:00 A.M.– 10:00 P.M.)	Nighttime Hours[b] (10:00 P.M.– 7:00 A.M.)	
R1 Proposed mixed-use development at 777 Alameda Street, northwest of the Project Site	770	69.2	65.4	71.1
R2 Proposed mixed-use development at 1024 Mateo Street, northeast of the Project Site	835	69.5	61.2	69.1

CNEL = Community Noise Equivalent Level

dBA = A-weighted sound pressure level in decibel

L_{eq} = equivalent sound level

[a] *Distances shown are estimated using Google Earth and are referenced to the nearest boundary of the Project Site.*

[b] *The range of hours for the daytime and nighttime periods shown herein are defined by the LAMC. For receptor locations R1 and R2, daytime ambient noise levels were measured between 1:00 P.M. and 3:00 P.M., and the nighttime ambient noise levels were measured between 10:00 P.M. and 12:00 A.M.*

[c] *Estimated based on short-term (15-minute) noise measurements per FTA procedures, see Appendix IS-10 of this IS/MND.*

Source: AES, August 2021.

2006), which is a technical report containing actual measured noise data for construction equipment.[195] These maximum noise levels would occur when equipment is operating under full power conditions (i.e., the equipment engine at maximum speed). However, equipment used on a typical construction site often operates under less than full power conditions, or part power. To more accurately characterize construction-period noise levels, the average (Hourly L_{eq}) noise level associated with each construction stage is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage.[196] These noise levels are typically associated with multiple pieces of equipment operating simultaneously. Therefore, the construction noise levels at the sensitive receptor locations were calculated based on the standard point source noise-distance attenuation factor of

[195] Federal Highway Administration, FHWA Roadway Construction Noise Model User's Guide, January 2006, https://ntlrepository.blob.core.windows.net/lib/49000/49100/49175/rcnm.pdf.

[196] Pursuant to the FHWA Roadway Construction Noise Model User's Guide, 2006, p. 7, the usage factor is the percentage of time during a construction noise operation that a piece of construction is operating at full power, https://ntlrepository.blob.core.windows.net/lib/49000/49100/49175/rcnm.pdf.

Table 13
Construction Equipment Noise Emission Reference Levels and Usage Factors

Type of Equipment	Acoustical Usage Factor (percent)	Reference Maximum Noise Levels at 50 Feet[a] L_{max} (dBA)
Air Compressor	40	78
Cement and Mortar Mixer	50	80
Compactor	20	83
Concrete Mixer Truck	40	79
Concrete Saw	20	90
Crane	16	81
Drill Rig	20	84
Forklift	10	75
Generator	50	81
Dump/Haul Truck	40	76
Excavator	40	81
Pump	50	81
Roller	20	80
Rubber Tired Loader	40	79
Tractor/Loader/Backhoe	40	80
Delivery Truck	40	74
Welders	40	74

dBA = A-weighted sound pressure level in decibel

L_{max} = maximum sound level

[a] *Construction equipment noise levels are based on FHWA RCNM.*

Source: FHWA Roadway Construction Noise Model User's Guide, Table 1, 2006.

6.0 dBA for each doubling of distance.[197] Additional noise attenuation was assigned as the line-of-sight to the Project Site would be interrupted by the presence of existing intervening structures.[198]

Table 14 on page 163 provides the estimated construction noise levels by month at the off-site noise sensitive receptors. As reported in Table 14, the estimated construction noise levels at the off-site noise sensitive receptors would be below the existing ambient noise levels, and thus, would not exceed the 5-dBA over the ambient noise level significance criterion. Therefore, the Project's potential noise impacts due to on-site construction would be less than significant, and no mitigation is required.

[197] Caltrans, Technical noise Supplement (TeNS), September 2013, Chapter 2.1.4.1, https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf.

[198] Caltrans, Technical noise Supplement (TeNS), September 2013, Figure 2-15, https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf.

Table 14
Construction Noise Levels

Potential Future Receptor Location	Calculated Construction Noise Levels by Month, CNEL (dBA)[a]											Existing Daytime Ambient Noise Levels (L_{eq} (dBA))	Significance Criteria (L_{eq} (dBA))[a]	Maximum Noise Exceedance Above the Criteria (L_{eq} (dBA))	Significant Impact?
	1–2	3	4–6	7–9	10–14	15	16–17	18–28	29	30–33	34				
R1	61.3	58.9	60.4	62.0	60.6	60.7	60.6	53.1	56.5	42.8	46.3	69.2	74.2	0.0	No
R2	47.7	49.0	48.2	50.0	49.0	50.0	48.8	42.5	44.3	40.3	43.9	69.5	74.5	0.0	No

[a] *Construction activity by month:*

- *Months 1–2: New Demo, Parking Garage Demo, Existing Demo*
- *Month 3: New Demo, Parking Garage Grading, Existing Demo*
- *Months 4–6: New Grading, Parking Garage Foundation/Structure, Existing Demo*
- *Months 7–9: New Foundation/Structure, Parking Garage Foundation/Structure, Existing Structural Upgrades*
- *Months 10–14: New Foundation/Structure, Parking Garage Interior, Existing Structural Upgrades*
- *Month 15: New Foundation/Structure, Parking Garage Paving/Landscape, Existing Structural Upgrades*
- *Months 16–17: New Foundation/Structure, Existing Structural Upgrades, Existing Interior*
- *Months 18–28: New Interior, Existing Interior*
- *Month 29: New Paving/Landscape, Existing Interior*
- *Months 30–33: Existing Interior*
- *Month 34: Existing Landscape*

Detail calculation worksheets are included in Appendix IS-10 of this IS/MND.

Source: AES, August 2021.

Off-Site Construction Traffic

In addition to on-site construction noise, the Project would generate mobile noise from delivery/haul trucks and construction workers traveling to and from the Project Site during the Project's construction. Loaded haul trucks would exit the Project gate at Hunter Street/Lawrence Street, make a left turn onto Lawrence Street, left onto Olympic Boulevard, and right onto I-10 Freeway. An alternate route for haul trucks leaving the Project Site includes: trucks exit from the Project's main gate, left onto 8th Street, left onto Alameda Street, left onto Olympic Boulevard and right onto the I-10 Freeway. Empty haul trucks coming to the Project Site would travel westbound on I-10 Freeway, exit 14th Street, right onto Alameda Street heading north, right onto 8th Street and right onto Project Site. There are no noise sensitive uses along these anticipated haul routes. In addition to the construction trucks, construction workers are expected to arrive at the Project Site before construction starts and leave when construction ends, and thus, would not overlap with the Project's construction equipment or trucks. In addition, construction workers would come from various directions to the Project Site. The Project would have maximum of 400 workers on-site during the peak construction period. Therefore, it is estimated that there would be maximum of 400 worker trips arriving and leaving the Project Site. Based on a conservative assumption that all worker trips would utilize Alameda Street, the estimated noise level due to worker trips along Alameda Street would be 64.3 dBA (L_{eq}). When added to the ambient noise level of 69.2 dBA (L_{eq}), the Project plus ambient noise level would be 70.4 dBA (L_{eq}). The estimated noise increase along Alameda due to Project construction workers would be 1.2 dBA, which would be below the 5-dBA significance criterion (applicable at the potential future noise sensitive receptor location R1). Therefore, the Project's potential off-site construction traffic noise impacts would be less than significant, and no mitigation measures are required.

Operational Noise

Noise associated with Project operation would include: (a) on-site stationary source noise, including outdoor mechanical equipment (e.g., HVAC equipment), parking facilities, loading dock and trash compactor operations, and activities within the proposed outdoor spaces; and (b) off-site mobile source (roadway traffic) noise.

On-Site Noise

Mechanical Equipment

The Project would include new air conditioning mechanical equipment (e.g., air ventilation equipment), which would be located at the roof level of the new buildings. Project-related outdoor mechanical equipment would be designed to comply with the City's Noise Regulations (Section 112.02 of the LAMC) to ensure that it would not increase the existing ambient noise levels by 5 dBA. Table 15 on page 165 presents the estimated on-site mechanical equipment noise levels associated with this equipment at the two potential future off-site receptor locations. As shown on Table 15, the estimated noise levels from the mechanical equipment would range from 46.4 dBA (L_{eq}) at potential future receptor location R2 to 50.6 dBA (L_{eq}) at potential future receptor location R1, both of which would be well below the existing ambient noise levels. As such, the Project's noise levels due to the mechanical equipment at the two potential future off-site receptor locations would be below the significance threshold of 5 dBA (L_{eq}) above existing ambient noise levels. Therefore, noise impacts from the Project's mechanical equipment would be less than significant, and no mitigation is required.

Table 15
Mechanical Equipment Noise Levels

Potential Future Receptor Location	Existing Ambient Noise Levels, dBA (L_{eq})	Estimated Noise from Project Mechanical Equipment, dBA (L_{eq})	Ambient + Project Noise Levels, dBA (L_{eq})	Significance Threshold,[a] dBA (L_{eq})	Significant Impact?
R1	65.4	50.6	65.5	70.4	No
R2	61.2	46.4	61.3	66.2	No

Detail calculation worksheets are included in Appendix IS-10 of this IS/MND.

[a] *Significance thresholds are equivalent to the lowest measured ambient noise levels at the receptor plus 5 dBA, per City's Noise Regulations.*

Source: AES, August 2021.

Outdoor Spaces

The Project would include three outdoor areas, including: the audience holding area (adjacent to the Building 5), the plaza assembly area (adjacent to Building 1), and the outdoor dining patio (adjacent to Building 1). Noise levels associated with the outdoor spaces would be created by people talking. The noise analysis assumed that up to 600 people would be present at the audience holding area, up to 850 people would be present at the plaza assembly area, and up to 387 people would be present at the outdoor dining patio; these numbers are the maximum occupancy for each area based on data provided by Bastien and Associates, Inc. A reference noise level of 65 dBA for a male and 62 dBA for a female speaking in a raised voice were used for analyzing potential noise impacts from the outdoor spaces.[199] In order to analyze a typical noise scenario, it was assumed that up to 50 percent of the people (half of which would be male and the other half female) would be talking at the same time. In addition, the hours of operation for use of the outdoor areas were assumed to be from 8:00 A.M. to 12:00 A.M. Table 16 on page 166 presents the estimated noise levels from the Project's outdoor areas at the off-site sensitive receptors, resulting from the use of outdoor areas. As presented in Table 16, the estimated noise levels from the outdoor spaces would range from 25.5 dBA (L_{eq}) at potential future receptor location R1 to 26.6 dBA (L_{eq}) at potential future receptor location R1, which would not result in an exceedance of the significance threshold of 5 dBA over the ambient noise levels. Therefore, the Project's potential noise impacts from the outdoor uses would be less than significant, and no mitigation is required.

Parking

The Project would include a new 9-story above grade parking structure with 1,522 parking spaces, and 143 surface parking spaces distributed throughout the Project Site around the buildings. Sources of noise within the parking garage would primarily include vehicular movements (including tire squealing) and engine noise, doors opening and closing, and intermittent car alarms. Noise levels within the parking garage would fluctuate with the amount of automobile and human activity. The same sources of noise

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

Table 16
Outdoor Spaces Noise Levels

Potential Future Receptor Location	Existing Ambient Noise Levels, dBA (L_{eq})	Estimated Noise from Outdoor Spaces,[a] dBA (L_{eq})	Ambient + Project Noise Levels, dBA (L_{eq})	Significance Threshold,[b] dBA (L_{eq})	Significant Impact?
R1	65.4	25.5	65.4	70.4	No
R2	61.2	26.6	61.2	66.2	No

Detailed calculation worksheets are included in Appendix IS-10 of this IS/MND.

[a] *Noise analysis assumed up to 600 people at the audience holding area, up to 850 people at the plaza assembly area, and up to 387 people at the outdoor dining patio.*

[b] *Significance thresholds are equivalent to the lowest measured ambient noise levels at the receptors plus 5 dBA, per City's Noise Regulations.*

Source: AES, August 2021.

and the same fluctuations in noise levels would be created at the surface parking spaces; however, noise levels associated with the surface parking would not generate an increase in noise levels as the surface parking spaces would be reduced when compared with the existing surface parking lot. Therefore, only noise from the new parking structure is analyzed.

Table 17 on page 167 presents the estimated noise levels associated with the parking structure operation at the potential future off-site sensitive receptors. As reported in Table 17, the estimated noise levels from the parking lot operation would range from 33.9 dBA (L_{eq}) at receptor location R1 to 37.2 dBA (L_{eq}) at receptor location R2, which levels would be well below existing ambient levels, and as a result, would not result in any exceedances of the 5 dBA significance threshold. Therefore, the Project's potential noise impacts from parking operations would be less than significant, and no mitigation is required.

Loading and Trash Compactor

The Project includes various outdoor truck loading areas serving the stages, kitchen areas, and shop building. The loading areas are located: within the west base camp between Buildings 3, 4 and 5 (up to 6 trucks); along Lawrence Street (1 trucks); on the east side of the shop Building 6 (2 trucks); and along the north (6 trucks), east (11 trucks) and south (4 trucks) sides of Building 1. The Project trash compactor would be located outside along the east property line facing Lemon Street. Noise sources associated with the loading dock and trash collection area would include delivery trucks and operation of the trash compactor. Based on measured noise levels from loading dock facilities and trash compactors, delivery trucks and trash compactors could generate noise levels of approximately 71 dBA (L_{eq}) and 66 dBA (L_{eq}), respectively, at a distance of 50 feet.[200] The noise analysis assumed up to 30 concurrent truck loadings in addition to operation of the trash compactor. Table 18 on page 167 presents the estimated noise levels associated with truck loading and trash compactor operations at the potential future off-site sensitive receptors. As reported in Table 18, the estimated noise levels from loading and trash compactor operations would range from 39.6 dBA (L_{eq}) at receptor location R1 to 45.2 dBA (L_{eq}) at receptor location

[200] RK Engineering Group, Inc., Wal-Mart/Sam's Club Reference Noise Level Study, 2003.

Table 17
Parking Noise Levels

Potential Future Receptor Location	Existing Ambient Noise Levels, dBA (L_{eq})	Estimated Noise from Parking Lot, dBA (L_{eq})	Ambient + Project Noise Levels, dBA (L_{eq})	Significance Threshold,[a] dBA (L_{eq})	Significant Impact?
R1	65.4	33.9	65.4	70.4	No
R2	61.2	37.2	61.2	66.2	No

Detailed calculation worksheets are included in Appendix IS-10 of this IS/MND.

[a] *Significance thresholds are equivalent to the lowest measured ambient noise levels at the receptors plus 5 dBA, per City's Noise Regulations.*

Source: AES, August 2021.

Table 18
Loading Dock and Trash Compactor Operation

Potential Future Receptor Location	Existing Ambient Noise Levels, dBA (L_{eq})	Estimated Noise from Loading and Trash Compactor, dBA (L_{eq})	Ambient + Project Noise Levels, dBA (L_{eq})	Significance Threshold,[a] dBA (L_{eq})	Significant Impact?
R1	65.4	39.6	65.4	70.4	No
R2	61.2	45.2	61.3	66.2	No

[a] *Significance thresholds are equivalent to the lowest measured ambient noise levels at the receptors plus 5 dBA, per City's Noise Regulations.*

Detailed calculation worksheets are included in Appendix IS-10 of this IS/MND.

Source: AES, August 2021.

R2, which would be well below existing ambient levels, and as a result, would not result in any exceedances of the 5 dBA significance threshold. Therefore, the Project's potential noise impacts from loading and trash compactor operations would be less than significant, and no mitigation is required.

Off-Site Traffic Noise

Project-generated traffic noise impacts were evaluated by comparing the increase in noise levels from the "future without project" condition to the "future with project" condition against the Project's significance threshold for off-site traffic noise impacts. Cumulative noise impacts due to off-site traffic were analyzed by comparing the projected increase in traffic noise levels from "existing" conditions to "future with project" conditions to the Project's significance criteria. Traffic noise levels at the off-site noise sensitive receptors

were calculated using FHWA's Traffic Noise Model and the Project's traffic volume data.[201,202] The traffic noise impact analysis is based on the 24-hour CNEL noise descriptor.

Table 19 on page 169 reports the results of the off-site traffic noise analysis. As shown in Table 19, Project-generated traffic would result in a maximum noise increase of 2.8 dBA CNEL along 8th Street (east of Alameda Street). The estimated noise levels along other analyzed roadway segments would be 1.3 dBA CNEL or lower. In addition, the cumulative traffic volumes would result in a maximum increase of 3.0 dBA CNEL along 8th Street (east of Alameda Street). The estimated noise increase along Alameda Street (between 8th Street and Olympic Boulevard), Lemon Street (between Damon Street and 11th Street), Mateo Street (between 8th Street and Olympic Boulevard), 7th Street (Central Ave. and Alameda Street), Olympic Boulevard (between Central Avenue and Mateo Street), and 8th Street (between Central Avenue and Lemon Street) would be well below the 5-dBA significance threshold (applicable to noise levels less than 67.5 CNEL (dBA) "normally acceptable" and between 67.5 to 77.5 CNEL (dBA) "conditionally acceptable" land use category for commercial uses). The estimated noise increases along Alameda Street (between 6th Street and 8th Street), and 7th Street (between Alameda Street and Wilson Street) would be below the 3-dBA significance threshold under both Project and Cumulative level (applicable to noise levels within the 70 to 75 CNEL (dBA) "normally unacceptable" land use category for residential and school uses). Therefore, off-site traffic noise impacts associated with the Project would be less than significant, and no mitigation is required.

Composite Noise Levels

An evaluation of the Project's composite noise levels, including all Project-related noise sources plus the existing ambient level, was conducted to identify the potential maximum Project-related noise level increase that may occur at the two potential future noise-sensitive receptor locations. The overall sound environment of the areas surrounding the Project Site would include contributions from each on-site and off-site noise source associated with the operation of the Project. On-site noise sources associated with the Project would include the use of mechanical equipment, loading dock and trash compactor operations, outdoor uses, and parking operations. Table 20 on page 171 presents the estimated composite noise from Project-related noise sources in terms of CNEL at the two potential future noise sensitive receptors. As reported in Table 20, the Project would result in a maximum increase of 0.2 dBA CNEL at potential future receptor R2 and 0.3 dBA CNEL at potential future receptor R1. The increases in noise levels due to the Project at the potential future off-site receptors would be well below the 3 dBA CNEL significance threshold at receptor R1 (applicable to noise levels of 70 dBA CNEL or greater at residential uses) and the 5 dBA CNEL significance threshold at receptor R2 (applicable to noise levels less than 70 dBA CNEL at residential uses). Therefore, the composite noise level impacts due to Project operation would be less than significant, and no mitigation is required.

Conclusion

Based on the above, potential noise impacts associated with the Project construction and operation would be less than significant, and no mitigation measures are required.

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201 Federal Highway Administration, Traffic Noise Model (TNM) Version 2.5,

202 Gibson Transportation Consulting, Inc., 8th & Alameda Project Traffic Analysis, 2021,

Table 19
Off-Site Roadway Traffic Noise Impacts

Roadway Segment	Existing Adjacent Land Use	Calculated Traffic Noise Levels, CNEL (dBA)[a]			Increase in Noise Levels, CNEL (dBA)		Significant Impact?	
		Existing Without Project (A)	Future Without Project (B)	Future With Project (C)	Project Level (C − B)	Cumulative (C − A)	Project Level	Cumulative
Alameda Street								
– Between 6th St. and 7th St.	Commercial, (Future Residential)	69.8	70.0	70.1	0.1	0.3	No	No
– Between 7th St. and 8th St.	Commercial (Future Mixed-Use)	69.6	69.8	70.1	0.3	0.5	No	No
– Between 8th St. and Olympic Blvd.	Commercial	69.2	69.2	69.7	0.2	0.5	No	No
Lemon Street								
– Between Damon St. and Olympic Blvd.	Commercial	61.1	61.3	62.5	1.2	1.4	No	No
– Between Olympic Blvd. and 11th Street	Commercial	55.1	55.3	55.3	0.0	0.2	No	No
Mateo Street								
– Between 8th St. and Olympic Blvd.	Commercial	67.3	67.5	67.6	0.1	0.3	No	No
Olympic Boulevard								
– Between Central Ave. and Alameda St.	Commercial	71.9	72.1	72.2	0.1	0.3	No	No
– Between Almeda St. Lemon St.	Commercial	71.6	71.8	71.8	0.0	0.2	No	No
– Between Lemon St. and Mateo St.	Commercial	71.0	71.2	71.3	0.1	0.3	No	No

Table 19 (Continued)
Off-Site Roadway Traffic Noise Impacts

Roadway Segment	Existing Adjacent Land Use	Calculated Traffic Noise Levels, CNEL (dBA)[a]			Increase in Noise Levels, CNEL (dBA)		Significant Impact?	
		Existing Without Project (A)	Future Without Project (B)	Future With Project (C)	Project Level (C − B)	Cumulative (C − A)	Project Level	Cumulative
7th Street								
– Between Central Ave. and Alameda St.	Commercial	69.6	69.8	69.9	0.1	0.3	No	No
– Between Alameda St. and Wilson St.	School, Commercial	69.7	69.9	70.0	0.1	0.3	No	No
8th Street								
– Between Central Ave. and Alameda St.	Commercial	63.2	63.4	63.4	0.0	0.2	No	No
– Between Alameda St. and Lemon St.	Commercial	61.2	61.4	64.2	2.8	3.0	No	No

[a] *Noise levels are calculated at 10 feet from the edge of roadway. Detail calculation worksheets are included in Appendix IS-10 of this IS/MND.*

Source: AES, August 2021.

Table 20
Composite Noise Levels

Potential Future Receptor Location	Calculated Project-Related Noise Levels, CNEL (dBA)[a]					Project Composite Noise Levels, CNEL (dBA)	Ambient Noise Levels, CNEL (dBA)	Ambient + Project Noise Levels, CNEL (dBA)	Increase in Noise Levels Due to Project, CNEL (dBA)
	Traffic	Mechanical	Loading & Trash Compactor	Parking	Outdoor Spaces				
R1	58.3	50.1	41.9	40.6	27.9	59.1	71.1	71.4	0.3
R2	51.2	53.1	47.5	43.9	29.3	56.2	69.1	69.3	0.2

[a] *Detail calculation worksheets are included in Appendix IS-10 of this IS/MND.*

Source: AES, August 2021.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Heavy construction equipment (e.g., a bulldozer and excavator) would generate a limited amount of ground-borne vibration at short distances away from the source. Potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in close proximity to the construction site (i.e., within 20 feet related to building damage; 80 feet related to human annoyance at residential uses).[203]

Heavy construction equipment (e.g., a large bulldozer) would generate a vibration level of up to 0.089 inch/second Peak Particle Velocity (PPV) at a distance of 50 feet from the equipment.[204] With respect to potential building damage, FTA provides potential building damage criteria varies from 0.12 PPV (inch/second) for buildings that are extremely susceptible to vibration to 0.50 PPV (inch/second) for reinforced-concrete, steel or timber buildings.[205]

The nearest off-site building structure is located at the southeast corner of Alameda Street and 8th Street, approximately 35 feet from the Project Site. Project construction activities would generate a maximum ground-borne vibration level of 0.054 PPV (inch/second) at the nearest off-site building, which would be well below the most stringent significance threshold of 0.12 PPV for buildings extremely susceptible to vibration.

There are two potential historical resources near the Project Site, including the Overland Terminal Produce Warehouse located at 872 Alameda Street and the Western Electric Company Historic District, which includes two buildings located at 800-822 McGarry Street and 1753 Olympic Street.[206] The Overland Terminal Produce Warehouse and the Western Electrical Company Historic District buildings are located 65 feet and 140 feet from the Project Site, respectively. The estimated vibration levels at these resources resulting from Project construction activities would be up to 0.021 PPV at the Overland Terminal Produce Warehouse building and up to 0.007 PPV at the Western Electric Company Historic District, both of which would be well below the 0.12 PPV significance criteria for buildings extremely susceptible to vibration damage (applicable to historic structures). As such, the Project's potential construction vibration impacts with respect to potential building damage would be less than significant, and no mitigation is required.

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203 Distances calculated based on estimated vibration levels for typical construction equipment at a distance that would result in vibration levels that would be below the 72 VdB significance threshold with respect to human annoyance and 0.12 PPV significance threshold applicable to buildings extremely susceptible to vibration damage.

204 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 7-4, www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

205 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 7-5, www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

206 Architectural Resources Group, 8th and Alameda Project Historical Resources Technical Report, March 11, 2021. See Appendix IS-3 of this IS/MND.

With respect to potential vibration-related human annoyance associated with on-site construction activities, FTA provides ground-borne vibration impact criteria of 72 VdB for residential uses.[207] The two nearest potential future off-site sensitive uses, potential future receptor locations R1 and R2 are approximately 770 and 835 feet from the Project Site, respectively. Heavy construction equipment (e.g., large bulldozer) would generate a vibration level of up to 87 VdB at a distance of 50 feet from the equipment.[208] Based on distance attenuation, the vibration levels associated with on-site construction activities are estimated to be up to 42 and 41 VdB at potential future receptor locations R1 and R2, respectively. These estimated vibration levels would be well below the FTA vibration criteria of 72 VdB applicable to residential and hotel uses.[209] As such, the Project's potential vibration impacts with respect to human annoyance associated with on-site construction activities would be less than significant, and no mitigation is required.

The City currently does not have significance criteria or guidelines with respect to potential groundborne noise impacts. According to the FTA, groundborne noise that accompanies building vibration is usually perceptible only inside buildings.[210] Furthermore, per the FTA, groundborne noise is typically only assessed at locations with subway or tunnel operations where there is no airborne noise path or for buildings with substantial sound insulation such as a recording studio.[211] The relationship between groundborne vibration and groundborne noise depends on the frequency content of the vibration and the acoustical absorption characteristics of the receiving room. Per the FTA, for typical buildings, groundborne vibration results in groundborne noise levels (dBA) that are approximately 20 to 50 decibels lower than the velocity level (VdB).[212] As analyzed above, the estimated groundborne vibration due to Project construction activities would be 42 and 41 VdB at the potential future receptor locations R1 and R2, respectively. Therefore, based on the FTA groundborne vibration to groundborne noise conversion factors, the groundborne noise inside the building at receptor locations R1 and R2 would be a maximum 22 and 21 dBA, respectively, which would be well below the FTA groundborne noise criteria of 35 dBA for residential uses.[213] Therefore, Project construction would result in less than significant groundborne noise impacts.

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[207] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 6-3. www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

[208] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 7-4, www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

[209] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 6-3, www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

[210] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, p. 118, www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

[211] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, p. 118, www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

[212] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 6-14. This is the conversion from groundborne vibration to groundborne noise, for rail sources, www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

[213] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 6-3. Groundborne noise impact criteria for residences and buildings where people normally sleep (frequent event). www.transit.dot.gov/sites/

(Footnote continued on next page)

Operational Groundborne Vibration and Noise

The Project's day-to-day operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce groundborne vibration and noise. Building mechanical equipment installed as part of the Project would typically include vibration-attenuation mounts to reduce vibration transmission to the building. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking area. Groundborne vibration from passenger vehicles would be similar to that already occurring within the existing surface parking lots. Furthermore, the potential future noise sensitive uses are located a minimum of 770 feet from the Project Site. Due to the rapid attenuation characteristics of groundborne vibration, vibration due to Project operations at the potential future sensitive receptors would be well below the perceptible level. Therefore, the Project would not result in the generation of excessive groundborne vibration levels at sensitive receptors in the vicinity of the Project site. As such, vibration impacts associated with operation of the Project would be below the significance threshold and impacts would be less than significant. No mitigation measures would be required.

As discussed above, vibration at the future potential sensitive receptor locations due to operation of the Project would be well below the perceptible level, due to distance attenuation (a minimum of 770 feet). As such, the Project would not generate excessive groundborne noise levels at the potential future sensitive receptor locations. Therefore, operation of the Project would result in less than significant groundborne noise impacts.

Conclusion

Based on the above, groundborne vibration and groundborne noise impacts associated with the Project would be less than significant, and no mitigation measures are required.

c. For a project located within the vicinity of a private airstrip or 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. The Project Site is not located within the vicinity of a private airstrip or an airport land use plan or within 2 miles of an airport. Thus, the Project would not expose people residing or working in the project area to excessive airport-related noise levels. The nearest airport is the Los Angeles International Airport located approximately 10 miles southwest of the Project Site. Since the Project is not located within an airport land use plan, within 2 miles of a public airport or public use airport, or within the vicinity of a private airstrip, impacts with regard to airport-related noise would not occur. Therefore, no impacts with respect to Threshold (c) would occur, and no mitigation is required.

(Footnote continued from previous page)

fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a. Would the project induce substantial unplanned 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)?

Less Than Significant Impact. A significant impact could occur if a project were to induce substantial unplanned population growth in an area, either directly or indirectly. As discussed in Section 2, Project Description, of this IS/MND, the Project is a commercial development consisting of studio, support, and office uses. Since the Project does not include a proposed housing component, it would not directly introduce a new residential population where none existed previously that could contribute to population growth in the vicinity of the Project Site or the Community Plan area.

While construction of the Project would create temporary construction-related jobs, the construction workers would likely be hired from the large, highly mobile regional construction work force already living and working within the Los Angeles metropolitan region that moves from project to project. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Typically, construction workers pass through various development projects on an intermittent basis as their particular trades are required. Given the short duration of the work for each job, and the large size and mobility of the construction labor pool that can be drawn upon in the region, construction workers would not be expected to relocate their residences within this region or move from other regions into this region in response to the short-term Project-related construction employment opportunities and, therefore, no new permanent residents would be generated during construction of the Project.

Operation of the Project would generate new employment positions, but these positions are not likely to result in increased population growth in the area. As discussed in Section 2, Project Description, of this IS/MND, the Project would renovate the existing Plant and vehicular maintenance building and would construct new studio uses. Uses provided by Building 1 would include: 11 sound stages totaling 156,100 square feet; 215,130 square feet of support/office space; 15,600 square feet of stage support uses; 55,400 square feet of offices; 17,000 square feet of post-production facilities; 59,670 square feet of mill/shop uses; a 15,500-square-foot fitness and health center; and 24,000 square feet of food services.

In addition, the Project would renovate the existing vehicular maintenance building east of Building 1 and adjacent to Lemon Street in order to house grip and lighting uses, which would comprise 24,000 square feet of floor area. As part of the new construction, the Project would provide 116,400 square feet of sound stages; 4,500 square feet of stage support uses; 87,300 square feet of support/office uses; 20,700 square feet of office uses; 20,700 square feet of mill/shop uses; and 190 square feet for three guard booths.

Based on employee generation rates provided by the City of Los Angeles VMT Calculator Documentation, the Project would generate approximately 2,094 employees.[214] As noted above, the Project would not introduce new homes at the Project Site and would therefore not result in a direct population growth in the area. While some of the new employment positions could be filled by persons who would relocate to the vicinity of the Project Site, this potential increase in population would not be substantial since not all employees would move close to the Project Site. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site. However, other opportunities would likely be filled by persons from the existing regional studio/support/office work force who would commute to the Project Site from other communities in and outside of the City.

According to SCAG's 2020–2045 RTP/SCS employee data and forecast for the City of Los Angeles, approximately 1,897,886 employees are projected in 2021, and 1,947,472 employees are projected in 2026, the Project's buildout year. As such, the City of Los Angeles is expected to increase employment by 49,586 new employees between 2021 and 2026, which is an increase of 2.61 percent over 2021 conditions.[215] The Project's 2,094 employees would represent 0.11 percent of the total number of employees in 2026 and 4.22 percent of the employment growth between 2021 and 2026. As such, the Project's employees would be consistent with SCAG's 2020–2045 RTP/SCS employee data and forecasts for the City of Los Angeles.

Therefore, given that the Project would not directly contribute to substantial population growth in the Project area through the development of residential uses, and given that many of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site and by people already living in the region who would commute to the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Further, because the Project Site is located in a highly developed area with an established network of roads and other urban infrastructure, development of the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

In summary, the Project's jobs would constitute a small percentage of employment growth. The Project's jobs would not be considered "unplanned growth" and would not be in such a high quantity as to induce unplanned residential growth. Therefore, the Project's employment opportunities would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth.

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[214] Gibson Transportation Consulting, Inc., Transportation Assessment for the 8th & Alameda Studio Project, August 2021, Appendix D, VMT Analysis Worksheets. See Appendix IS-11.1 of this IS/MND.

[215] According to SCAG's 2020–2045 RTP/SCS, the forecasted number of employees for the City of Los Angeles Subregion in 2021 is approximately 1,897,886 employees (based on a linear interpolation of 2016–2045 data). In 2026, the City of Los Angeles Subregion is anticipated to have approximately 1,947,472 employees (based on a linear interpolation of 2016–2045 data).

Based on the above, the Project would not induce substantial population or housing growth. Impacts would be less than significant, and no mitigation measures are required.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project Site is currently developed with a Los Angeles Times printing plant, vehicular maintenance building, ancillary buildings, and surface parking. As no housing currently exists on the Project Site, the Project would not displace any existing persons or housing, or require the construction of replacement housing elsewhere. Therefore, the Project would not create any impacts related to displacement of people or housing, and no mitigation measures would be required.

XV. 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:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?

Less Than Significant Impact. Fire protection for the Project Site is provided by the LAFD. Specifically, the Project Site is located within the service area of Fire Station No. 17 within Battalion 1 of the Central Bureau.

Construction

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and

coatings, and lighted cigarettes. Given the nature of construction activities and the work requirements of construction personnel, the Occupational Safety and Health Administration has developed safety and health provisions for implementation during construction, which are set forth in 29 Code of Federal Regulations (CFR), Part No. 1926. In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by the Occupational Safety and Health Administration.[216] Additionally, in accordance with the provisions of the Occupational Safety and Health Administration, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.[217] Construction of the Project would also occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities associated with the Project to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

According to the Safety Element of the City of Los Angeles General Plan, the nearest disaster routes to the Project Site include Alameda Street, which is located adjacent to the Project Site, and the I-10, which is located 0.3 mile south of the Project Site.[218],[219] Response times could temporarily increase for emergency vehicles traveling along streets adjacent to the Project Site and main connectors due to travel time delays caused by traffic during the Project's construction phase. However, with implementation of the Construction Management Plan in accordance with Project Design Feature TR-PDF-1 below, which is incorporated into the Project, emergency access would not be impeded. Furthermore, construction activities are expected to be primarily contained within the Project Site boundary with no encroachment into or closures on the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site. Therefore, Project-adjacent parking lanes and sidewalks along 8th Street and Hunter Street would not be affected by construction activities or the staging of construction materials and equipment.

Operation

Based on employee generation rates provided by the City of Los Angeles VMT Calculator Documentation, the Project would generate approximately 2,094 employees.[220] Thus, the daytime population within Fire Station No. 17's service area would increase by approximately 2,094 persons as compared to existing conditions. This daytime population projected to be generated by the Project would increase the demand for LAFD fire protection and emergency medical services. The Project would comply with all applicable provisions set forth in the City Building Code and Fire Code regarding structural design, building

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216 United States Department of Labor. Occupational Safety & Health Administration. Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed December 20, 2021.

217 United States Department of Labor. Occupational Safety & Health Administration. Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed December 20, 2021.

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

219 County of Los Angeles Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area, August 2008.

220 Gibson Transportation Consulting, Inc., Transportation Assessment for the 8th & Alameda Studio Project, August 2021, Appendix D, VMT Analysis Worksheets. See Appendix IS-11.1 of this IS/MND.

materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, prior to the issuance of a building permit. Moreover, the LAFD would be consulted during final building design to ensure adequate compliance with the Building and Fire Codes prior to the issuance of any construction permits. Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. Therefore, the Project would not result in the need for new or physically altered fire facilities.

With regard to emergency vehicle access during operation, as described in Section 2, Project Description, of this IS/MND and above, the Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from the surrounding streets. As discussed in Checklist Question No. XVII, Transportation, below, The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding area would be maintained during operation of the Project.

Additionally, with regard to fire flows, Checklist Question No. XIX, Utilities, below, according to the Water and Wastewater Infrastructure Study, a total of 12 existing public fire hydrants are adjacent to the Project and additional hydrants exist in the near vicinity In addition, six existing private fire hydrants are on-site. As set forth in the Water and Wastewater Infrastructure Study, according to the LAFD, the total fire flow requirement would be 4,500 gallons per minute (gpm) @ 20 psi, and three private fire hydrants would be required at a rate of 1500 gpm @ 20 psi per hydrant. As concluded by LAFD, based on the SAR and Fire Flow Availability Reports prepared for the Project by LADWP, fire flow for the Project would be adequate.[221] The installation of these additional hydrants would be accomplished during construction of the Project, the impacts of which are assessed throughout this IS/MND.

Based on the above, potential impacts to fire protection services would be reduced through compliance with numerous construction and Building Code and Fire Code standards affecting structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, building sprinkler systems, etc. Therefore, the Project would not result in the need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service. Therefore, impacts to fire protection would be less than significant, and no mitigation measures are required.

[221] Written Communication from Inspector Robert Duff, Los Angeles Fire Department, December 16, 2021.

b. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?

Less Than Significant Impact. Police protection services are provided to the Project Site and the surrounding area by the Los Angeles Police Department (LAPD). The Project Site is located in Reporting District 1309 within the jurisdiction of the LAPD's Central Bureau, and is served by the Newton Community Police Station located at 3400 S Central Ave, approximately 1.9 miles southwest of the Project Site.[222] This station has a service area encompassing 9 square miles with a population of over 150,000 people.[223]

Since the daytime population generated at the Project Site during construction (i.e., construction workers) would be temporary in nature, construction of the Project would not generate a permanent population on the Project Site that would substantially increase the police service population of the Newton Area. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. As such, the Project Applicant has incorporated into the Project temporary security measures including security fencing, lighting, and locked entry, which features would reduce the potential demand on police protection services at the Project Site associated with theft and vandalism during construction.

Project construction would be short-term. Project construction activities and the staging of construction equipment would primarily occur within the Project Site. Project construction activities would not result in encroachment or closures within the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site. In accordance with Project Design Feature TR-PDF-1, the Project would submit for approval and then implement a Construction Management Plan that would include specific measures to be implemented by the contractor to ensure safe and adequate access to the Project Site such that construction activities would not interfere with emergency access or response times.

Regarding Project operations, LAPD evaluates service capacity based on the residential population within the particular service area. As previously stated, the Project would not generate a residential population but would result in a daytime population of approximately 1,899 net new employees. To ensure security measures throughout the Project Site, the Project would include both vehicular and pedestrian guard booths, a closed circuit camera system, and keycard or guarded entry. The Project would also design building entrances and exits, open spaces, and pedestrian walkways to be open and in view of surrounding sites, and properly lit. Proper lighting of buildings and walkways would ensure visibility and secure routes between parking areas and points of entry into buildings. In addition, the Project would not impede police access to the Project Site. The Project would not result in the permanent closure of any local public streets, and access to the Project Site would continue to be provided from adjacent streets.

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[222] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166-023-010, 5166-023-016, 5166-027-014, and 5166-028-004, http://zimas.lacity.org/, accessed March 11, 2021.

[223] Los Angeles Police Department, About Newton www.lapdonline.org/newton_community_police_station/content_basic_view/1779, accessed April 2, 2021.

Furthermore, in accordance with California Vehicle Code (CVC) Section 21806, drivers of police vehicles have the ability to avoid traffic by using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, Project operation would not cause a substantial increase in emergency response times due to traffic congestion. Therefore, Project operation would not substantially increase the service population of the Newton Community Police Station and associated calls for LAPD services.

Notwithstanding, consistent with the decision in *City of Hayward v. Board of Trustees of California State University* and the requirements of California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police services is the responsibility of the City. LAPD will continue to monitor population growth and land development in the City and identify additional resource needs, including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction needs, that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAPD's resource needs will be identified and allocated according to the priorities at the time. At this time, LAPD has not identified the need for any new station construction in the area either because of this Project or other projects in the service area. If LAPD determines that new facilities are necessary at some point in the future, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332 and would not be expected to result in significant impacts, and projects involving the construction or expansion of a police station would be addressed independently of the Project pursuant to CEQA. Further analysis, including of a specific location for a future police station, would be speculative and beyond the scope of this document.

Therefore, based on the above, the Project would not result in the need for new or altered police facilities, or substantially increase the demand for police facilities. Project impacts with regard to police services would be less than significant, and no mitigation measures would be required.

c. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). LAUSD is divided into six local districts. The Project Site is located in Local District–East and is served by 9th Street Elementary School, Hollenbeck Middle School, Theodore Roosevelt Senior High School, and Felicitas and Gonzalo Mendez Senior High School.[224] As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD. In addition, the number of students that may be indirectly generated by the Project that could attend LAUSD schools serving the Project Site would not be anticipated to be substantial because not all employees of the Project are likely to reside in the vicinity of the Project Site. Furthermore, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to LAUSD

[224] Los Angeles Unified School District, Resident School Identifier, https://rsi.lausd.net/ResidentSchoolIdentifier/, accessed June 17, 2021.

prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered as full legal mitigation of Project-related school impacts. Thus, the Project would not result in the need for new or altered school facilities. Therefore, the Project's impacts would be less than significant, and no mitigation measures would be required.

d. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for park services?

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks (RAP). Nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include: Gladys Park (0.76 mile), Arts District Park (0.83 mile), Central Park Recreation Center and Pool (0.95 mile), San Julian Park (1.09 miles), Spring Street Park (1.40 miles), Boyle Heights Sports Center (1.41 miles), Trinity Recreation Center (1.44 miles), Pecan Recreation Center and Pool (1.50 miles), Ross Snyder Recreation Center and Pool (1.50 miles), Hollenbeck Recreation Center and Park (1.51 miles), Pershing Square Park (1.58 miles), Roosevelt Pool (1.62 miles), City Hall Park Center (1.64 miles), Costello Senior Citizen Center (1.65 miles), Lou Costello Jr. Recreation Center and Pool (1.72 miles), Ross Valencia Community Park (1.80 miles), Ramon Garcia Recreation Center (1.82 miles), Los Angeles Plaza Park (1.86 miles), and Central Avenue Pocket Park (1.88 miles).[225]

As previously discussed, the Project does not propose the development of residential uses. Therefore, development of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. As discussed above, based on employee generation rates promulgated by the City of Los Angeles VMT Calculator Documentation, the Project would generate approximately 1,899 net new employees. These new employment opportunities may be filled in part by persons already residing in the vicinity of the Project Site who already utilize existing local parks and recreational facilities and in part by persons commuting from other parts of the region who utilize existing parks and recreational facilities in their own local areas and would likely use the existing local parks intermittently, such as during lunch or after work. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks and recreational facilities. As described in Section 2, Project Description, of this IS/MND, the Project would provide indoor and outdoor open space and recreational amenities for employees. Specifically, the Project would include an indoor 15,500-square-foot fitness and health center as well as lounge/seating areas. The Project would also include 122,010 square feet of open space with ornamental landscaping, including a 5,800-square-foot outdoor dining patio on the northwestern border of Building 1 and a 6,100-square-foot outdoor dining patio on the western border of Building 1. The remainder of the landscaped open space would be located throughout the Project Site bordering the buildings and parking areas. As such, the Project's on-site open space and amenities would help to offset the demand for off-site parks and recreational facilities for the Project's net new employees creating new demand on the existing parks and recreational facilities. While it is possible that some of the Project's net new employees may utilize local parks and recreational facilities, this increased demand would be

[225] City of Los Angeles Department of Recreation and Parks, Facility Map Locator within 2 miles, www.laparks.org/maplocator?cat_id=All&geo%5Bradius%5D=2&geo%5Blatitude%5D=34.0297417&geo%5Blongitude%5D=-118.2385139&address=1820%20E%208th%20St%2C%20Los%20Angeles%2C%20CA%2090021%2C%20USA, accessed June 21, 2021.

negligible due to the amount of time it would take for employees to access off-site local parks instead of the on-site facilities. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Therefore, while the Project's net new employment opportunities could have the potential to indirectly increase the population of the Central City North Community Plan area, that new demand for public parks and recreational facilities would be limited. Thus, the Project would not result in the need for new or altered park facilities, or substantially increase the demand for parks. The Project's impacts on parks would be less than significant, and no mitigation measures would be required.

e. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

Less than Significant Impact. Other public facilities provided to the Project Site include library services. The Los Angeles Public Library (LAPL) provides library services to the City through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through Web-based resources. The Project Site area is served by existing LAPL facilities including the Little Tokyo Branch Library (1.5 mile northwest), the Los Angeles Central Library (1.7 miles northwest), and Benjamin Franklin Branch Library (1.7 miles northeast). As previously discussed, the Project does not propose the development of residential uses. Therefore, development of the Project would not result in a direct increase in the number of residents within the service population of the local LAPL facilities. As discussed above, based on employee generation rates promulgated by the City of Los Angeles VMT Calculator Documentation, the Project would generate approximately 1,899 net new employees. The Project's net new employees would have internet access to LAPL and other web-based resources, which would decrease their demand on library facilities. Furthermore, as some of the Project's net new employees would commute to work from other areas in the region and would be more likely to use library facilities near their homes during non-work hours, and others of the Project's net new employees would already be residing in the vicinity of the Project Site and would already be using the local libraries, the potential indirect population generation attributable to those employees would generate minimal demand for library services. While the Project is likely to generate some increased demand on the local libraries, that demand is not likely to be substantial on any one of the local libraries, or on all of the local libraries together. Therefore, the Project would not result in the need for new or altered library facilities, or substantially increase the demand for library services. The Project's impacts on library facilities would be less than significant, and no mitigation measures are required.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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. As discussed in the Response to Checklist Question XV(d) above, the Project does not propose the development of residential uses which would create a demand on nearby parks or recreational facilities. As discussed above, based on employee generation rates promulgated by the City of Los Angeles VMT Calculator Documentation, the Project would generate approximately 1,899 net new employees. These new employment opportunities that could be generated by the Project are likely to be filled in part by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities, and in part by employees who commute to the Project Site from other areas in the region who already utilize existing parks and recreational facilities close to their homes in those other areas; all of these employees would already have access to the existing regional parks in the area. Therefore, only a fraction of the Project's net new employees would create a demand on the existing local and regional parks and recreational facilities. As described in Section 2, Project Description, of this IS/MND, the Project would provide indoor and outdoor open space and recreational amenities for employees. Specifically, the Project would include an indoor 15,500-square-foot fitness and health center as well as lounge/seating areas. The Project would also include 122,010 square feet of open space with ornamental landscaping, including a 5,800-square-foot outdoor dining patio on the northwestern border of Building 1 and a 6,100-square-foot outdoor dining patio on the western border of Building 1. The remainder of the landscaped open space would be located throughout the Project Site bordering the buildings and parking areas. As such, the Project's on-site open space and amenities would help to offset the demand for off-site parks and recreational facilities for the Project's net new employees creating new demand on the existing parks and recreational facilities. While it is possible that some of the Project's net new employees may utilize local parks and recreational facilities, this increased demand would be negligible due to the amount of time it would take for employees to access off-site local parks instead of the on-site facilities. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Therefore, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. The Project's impact on parks and recreational facilities would be less than significant, and no mitigation measures are 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?

No Impact. As described in Section 2, Project Description, of this IS/MND, the Project would provide indoor and outdoor open space and recreational amenities for employees. Specifically, the Project would include an indoor 15,500-square-foot fitness and health center as well as lounge/seating areas. The

Project would also include 122,010 square feet of open space with ornamental landscaping, including a 5,800-square-foot outdoor dining patio on the northwestern border of Building 1 and a 6,100-square-foot outdoor dining patio on the western border of Building 1. The remainder of the landscaped open space would be located throughout the Project Site bordering the buildings and parking areas. The impacts of the construction of the indoor and outdoor open space and recreational amenities are analyzed as part of the Project throughout this MND. As also discussed above, the Project does not include any residential uses and therefore would not result in any direct substantial population growth that would increase use of existing recreational facilities. Therefore, the Project would not necessitate construction of new recreational facilities. No Project impacts would occur, and no mitigation measures are required.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

The following analysis is based, in part, on the *Transportation Assessment for the 8th & Alameda Studio Project* (Transportation Assessment) prepared by Gibson Transportation Consulting, Inc., dated August 2021 and included as Appendix IS-11.1 of this IS/MND. The Transportation Assessment was prepared in accordance with the assumptions, methodologies, and procedures outlined in the City of Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (TAG) (July 2020), and was approved by LADOT as provided in the Transportation Impact Assessment Approval Letter dated August 27, 2021 included as Appendix IS-11.2 of this IS/MND. The scope of, and analysis included in, the Transportation Assessment was developed in consultation with LADOT as set forth in a Memorandum of Understanding included as Appendix A of the Transportation Assessment.

a. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant. Table 2.1-1 of the TAG provides a list of City documents that establish the City's transportation regulatory framework and help guide the determination of whether a project conflicts with the City's plans, programs, ordinances, or policies. A project would be considered consistent with, and not to conflict with, a policy if it is generally in conformance with it and does not obstruct the implementation of that policy or preclude future improvements. If a conflict is identified, mitigation

measures would focus on improving access, comfort, and safety for all road users, especially pedestrians, bicyclists, and transit riders. Each of the documents listed in Table 2.1-1 of the TAG was reviewed for its applicability to the Project, and the relevant transportation-related policies are summarized below, along with an assessment of the Project's consistency with each.

Mobility Plan 2035

Mobility Plan 2035 combines "complete street" principles with the following goals and objectives that define the City's mobility priorities:[226] The Mobility Plan includes five main goals that define the City's high-level mobility priorities: (1) Safety First; (2) World Class Infrastructure; (3) Access for All Angelenos; (4) Collaboration, Communication, and Informed Choices; and (5) Clean Environments and Healthy Communities. Each of the goals contains policies to support the achievement of those goals. The Project consistency with specific policies of Mobility Plan 2035 is assessed below.

Policy 1.1 Roadway User Vulnerability—Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user.

Alameda Street is a designated Avenue I and 8th Street, Lemon Street, Hunter Street, and Lawrence Street are designated as Collector Streets in the Mobility Plan.[227] The full access driveway on 8th Street and the truck outbound-only driveway on Lemon Street would utilize existing curb cuts. The outbound-only driveways on 8th Street and Hunter Street and the truck inbound-only driveway would require the installation of new curb cuts, but these are not streets identified as part of the City's High Injury Network. In addition, separate pedestrian and bicycle access to the Project Site would be provided via entrances along 8th Street. All driveways would be designed according to City standards and the Project would be designed in compliance with Americans with Disabilities Act (ADA) standards. Off-street parking and bicycle parking would be provided per City code requirements as well. Therefore, the Project would be designed to support the safety of roadway users and would not conflict with this policy.

Policy 1.6 Multi-Modal Detour Facilities—Design detour facilities to provide safe passage for all modes of travel.

Construction activities would primarily be maintained on-site. Any impediments to the public right-of-way would be addressed with implementation of a Construction Management Plan pursuant to Project Design Feature TR-PDF-1, detailed below, which the Applicant has incorporated into the Project. Therefore, the Project would not conflict with this policy.

Policy 2.3 Pedestrian Infrastructure—Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

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[226] Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, last adopted by City Council on September 7, 2016.

[227] According to the Mobility Plan, an Avenue I passes through both residential and commercial areas and provide up to two travel lanes in each direction with a target operating speed of 35 miles per hour (mph). Collector Streets are generally located in residential neighborhoods and provide access to and from arterial streets for local traffic and are not intended for cut-through traffic. Collector Streets provide one travel lane in each direction with a target operating speed of 25 mph.

Alameda Street north of Bay Street, 7th Street west of Mill Street, and Central Avenue within the Transportation Assessment's Study Area are identified as part of the Mobility Plan's Pedestrian Enhanced District. The Project does not propose repurposing existing curb space and does not propose narrowing or shifting existing sidewalk placement or paving, narrowing, shifting, or removing an existing parkway. The Project is also proposing pedestrian improvements, such as landscaping, along the Project Site's frontage on 8th Street, Alameda Street, and Hunter Street to meet the long term mobility needs identified in the Mobility Plan. Therefore, the Project would not conflict with this policy.

Policy 2.4 Neighborhood Enhanced Network—Provide a slow speed network of locally serving streets.

No streets adjacent to the Project Site are identified as part of the Mobility Plan's Neighborhood Enhanced Network. The Project is proposing pedestrian improvements along the Project Site's frontage to meet the long-term mobility needs identified in the Mobility Plan. Therefore, the Project would not conflict with this policy.

Policy 2.5 Transit Network—Improve the performance and reliability of existing and future bus service.

Olympic Boulevard adjacent to the Project Site is identified as part of the Mobility Plan's Transit Enhanced Network. The Project is proposed on the Project Site, which is located in an urban area with convenient access to bus transit services. The Project's redevelopment of the Project Site with a studio campus would intensify it use which, in turn, would encourage greater transit usage. Therefore, the Project would not conflict with this policy.

Policy 2.6 Bicycle Networks—Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities (includes scooters, skateboards, rollerblades, etc.).

The Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure, and the Project driveways are not proposed along a street with a bicycle facility. Bicycle parking would also be provided on-site in accordance with LAMC requirements, as well as amenities for persons choosing to travel to the Project by bicycle. Therefore, the Project would not conflict with this policy.

Policy 2.10 Loading Areas—Facilitate the provision of adequate on and off street loading areas.

All proposed rideshare drop-off/loading zones would be provided on-site. The delivery and loading zones would be located along Lawrence Street in the southwestern portion of the Project Site separate from other circulation areas and would be managed to facilitate safe loading operations and to limit vehicle queue spillovers into the travel lanes. Therefore, the Project would not conflict with this policy.

Policy 3.1 Access for All—Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City's transportation system.

As described in Section 2, Project Description, of this IS/MND, the Project encourages multi-modal transportation alternatives and access for all travel modes to and from the Project Site. The Project provides separate pedestrian and bicycle entrances, bicycle infrastructure (short- and long-term bicycle

parking) and amenities, and pedestrian assistance (e.g., wayfinding signs, safety lighting) to encourage walking and bicycling. The Project encourages transit usage by redeveloping the Project Site, located in proximity to transit, with a more intense development consisting of studio/office uses. Therefore, the Project would not conflict with this policy.

Policy 3.2 People with Disabilities—Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.

The Project's vehicular and pedestrian entrances would be designed in accordance with LADOT standards and would comply with ADA requirements. The Project design would also be in compliance with all ADA requirements and would provide direct connections to pedestrian amenities at adjacent intersections. Therefore, the Project would not conflict with this policy.

Policy 3.8 Bicycle Parking—Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.

As described in Section 2, Project Description, of this IS/MND, the Project provides infrastructure and services to encourage bicycling for employees and visitors to the Project Site. Specifically, the Project would provide separate pedestrian and bicycle entrances, bicycle parking spaces, a bicycle repair station, and shower facilities for cyclists. Therefore, the Project would not conflict with this policy.

Policy 4.5 Improved Communication—Facilitate communications between citizens and the City in reporting on and receiving responses to non-emergency street improvements.

In accordance with Project Design Feature TR-PDF-1, as part of the Project's Construction Management Plan, advance notification to the adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of construction, would be provided. Therefore, the Project would not conflict with this policy.

*Policy 4.8 Transportation Demand Management Strategies—Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-*occupancy vehicles.

The Project incorporates several design features, which include TDM measures to reduce the number of single occupancy vehicle trips to the Project Site, including bike parking per LAMC requirements, including short-term and long-term parking facilities, a bicycle repair station, and shower facilities for cyclists. The Project would not conflict with this policy.

Policy 4.13 Parking and Land Use Management—Balance on-street and off-street parking supply with other transportation and land use objectives.

As described in Section 2, Project Description, of this IS/MND, the Project would provide sufficient off-street parking to accommodate Project parking demand. No on-street parking would be provided adjacent to the Project Site. Therefore, the Project would not conflict with this policy.

Policy 5.1 Sustainable Transportation—Encourage the development of a sustainable transportation system that promotes environmental and public health.

As described in Section 2, Project Description, of this IS/MND, the Project includes separate pedestrian and bicycle entrances, secured bicycle parking facilities, and pedestrian connections within the Project Site and connecting to off-site pedestrian facilities. These Project features would promote active transportation modes such as biking and walking that are alternatives to vehicle use. Additionally, the Project is proposed on a Project Site in an urban setting that is located adjacent to several Metro bus stops, providing employees and visitors to the Project with public transportation alternatives. Therefore, the Project would not conflict with this policy.

Policy 5.2 Vehicle Miles Traveled (VMT)—Support ways to reduce vehicle miles traveled (VMT) per capita.

As described further below under Checklist Question No. XVII.b, the Project is estimated to generate lower work VMT per employee than the average for the area in which the Project Site is located. Specifically, as further detailed under Checklist Question No. XVII.b, the Project would generate a work VMT per employee of 7.4, which falls below the significance thresholds for the Central APC (i.e., 7.6 work VMT per employee). Furthermore, the Project as proposed incorporates several TDM measures to reduce the number of single occupancy vehicle trips to the Project Site. Therefore, the Project would not conflict with this policy.

Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan introduces guidelines for the City to follow to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.[228]

Policy 1.5 Plan for Health—Improve Angelenos' health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.

As described in Section 2, Project Description, of this IS/MND, the Project prioritizes safety and access for all individuals utilizing the Project Site by complying with all ADA requirements, and by providing separate pedestrian and bicycle entrances, bicycle parking and associated amenities for cyclists, and direct connections to pedestrian amenities at adjacent intersections. In addition, the Project supports healthy lifestyles and well-being by locating its jobs on the Project Site, which is in an established urban area adjacent to transit (Metro Local Bus Lines), and encouraging active transportation by providing bicycle parking and associated amenities, and enhancing the pedestrian environment by providing landscape elements for a more comfortable environment for pedestrians. Therefore, the Project would not conflict with this policy.

Policy 2.8 Basic Amenities—Promote increased access to basic amenities, which include public restrooms and free drinking water in public spaces, to support active living and access to health-promoting resources.

[228] Los Angeles Department of City Planning, Plan for a Health Los Angeles: A Health and Wellness Element of the General Plan, March 2015.

As described in Section 2, Project Description, of this IS/MND, the Project would provide indoor and outdoor open space and recreational amenities for employees. Specifically, the Project would include an indoor 15,500-square-foot fitness and health center as well as lounge/seating areas. The Project would also include 122,010 square feet of open space with ornamental landscaping, including a 5,800-square-foot outdoor dining patio on the northwestern border of Building 1 and a 6,100-square-foot outdoor dining patio on the western border of Building 1. The remainder of the landscaped open space would be located throughout the Project Site bordering the buildings and parking areas. Therefore, the Project would not conflict with this policy.

> *Policy 5.7 Land Use Planning for Public Health and GHG Emission Reduction—Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.*

As previously discussed and as will be discussed below, the Project is estimated to generate lower work VMT per capita for employees than the average for the area. Additionally, the Project incorporates several TDM measures to reduce the number of single occupancy vehicle trips to the Project Site, including short-term and long-term bike parking per LAMC and associated amenities to encourage cyclists and pedestrian friendly features. As VMT directly contributes to GHG emissions, the Project's reduction of work VMT per employee would also serve to reduce GHG per capita. Therefore, the Project would not conflict with this policy.

Land Use Element of the General Plan

The City General Plan's Land Use Element contains 35 Community Plans that establish specific goals and strategies for the various neighborhoods across Los Angeles.[229] The Project is located within the Central City North Community Plan (Community Plan) area. A detailed analysis of the Project's consistency with the Community Plan is provided in Checklist Question No. XI, Land Use, of this IS/MND. An assessment of the Project's consistency with relevant objectives of the Community Plan related to circulation is provided below.

> *Objective 4-4—To encourage traditional and non-traditional sources of open space by recognizing and capitalizing on linkages with transit, parking, historic resources, cultural facilities, and social services programs.*

As described in Section 2, Project Description, of this IS/MND and above, the Project would improve the pedestrian environment within and around the Project Site by improving the adjacent sidewalks with enhanced landscaping and street trees, and by providing separate pedestrian and bicycle entrances and direct connections to pedestrian amenities at adjacent intersections. The Project would also incorporate open space throughout the Project Site to connect the various buildings of the Project. These open spaces would be open to Project employees and visitors. Therefore, the Project would not conflict with this objective.

> *Objective 11-6—To accommodate pedestrian open space and usage in Central City.*

[229] Los Angeles Department of City Planning, City of Los Angeles General Plan Framework Element, approved July 27, 1995.

As described in Section 2, Project Description, of this IS/MND, Project would provide a pedestrian-friendly environment with improved sidewalks along the Project Site frontage that would be landscaped with street trees. The Project would remove five street trees, but would plant 19 new street trees so that, at buildout, a total of 65 street trees would be located in the public right-of-way. As described above, the open spaces within the Project Site would be open to Project employees and visitors. Therefore, the Project would not conflict with this objective.

> *Objective 11-7—To provide sufficient parking to satisfy short-term retail/business users and visitors but still find ways to encourage long-term office commuters to use alternate modes of access.*

As described in Section 2, Project Description, of this IS/MND, vehicular parking would be provided on-site to serve the various uses of the Project. The Project would also include features to encourage alternative modes of travel such as transit, bicycling and walking. The Project is proposed on an urban infill site with convenient access to transit, and proposes to intensify the use of the Project Site as compared to its existing uses, which would encourage greater transit use. The Project also includes features that would encourage cyclists and pedestrians, such as bicycle parking facilities and associated amenities, as well as pedestrian network improvements, both connecting within the Project Site and connecting to off-site pedestrian facilities, that would encourage alternate modes of these alternative modes of transportation, as well as transit. Therefore, the Project would not conflict with this objective.

Los Angeles Municipal Code (LAMC)

LAMC Section 12.21-A,16 details the bicycle parking requirements for new developments. Per LAMC Section 12.21.A16(c), buildings undergoing a change of use, including adaptive reuse projects, are not required to provide bicycle parking. Thus, no bicycle parking is required for the existing Plant or vehicular maintenance buildings. LAMC Section 12.21 A.16(a)(2) requires 1 short term and 1 long-term bicycle parking space per 10,000 square feet for studio uses (other commercial uses) and 1 short term bicycle parking space per 10,000 square feet and 1 long-term space per 5,000 square feet of office uses. Following the completion of the Project, the Project's new studio sound stage, production support, and ancillary uses would require 17 short-term and 17 long-term bicycle parking spaces, while the Project's office uses would require 8 short-term and 16 long-term bicycle parking spaces. Therefore, the total LAMC bicycle requirement for the Project is 25 short-term and 33 long-term bicycle parking spaces. The Project would meet and exceed this requirement by providing 58 bicycle parking spaces consisting of 25 short-term and 33 long-term spaces. Therefore, the Project would not conflict with this provision of the LAMC.

LAMC Section 12.26-J refers to the TDM Ordinance and establishes TDM requirements for non-residential projects, in addition to non-residential components of mixed-use projects, in excess of 25,000 square feet. As described in Section 2, Project Description, of this IS/MND and above, the Project incorporates TDM measures to encourage use of alternative transportation modes by providing on-site bicycle parking facilities and amenities, providing pedestrian friendly features with connections to off-site pedestrian facilities, and proposing its intensified development on a Project Site located in an established urban area with proximity to transit opportunities, consistent with the requirements set forth in the TDM Ordinance. In addition, the Project would implement parking management measures such as parking gate control technology to facilitate ingress and egress at the driveways to limit queue spillover and minimize traffic and parking-related impacts on the surrounding street system to the extent feasible. Therefore, the Project would not conflict with this provision of the LAMC.

LAMC Section 12.37 states that a project must dedicate and improve adjacent streets to half-right-of-way standards consistent with street designations from the Mobility Plan. As provided in Section 2, Project Description, of this IS/MND, the Project is requesting that the Project be relieved of the following required dedications and improvements through the approval of the Vesting Tentative Tract Map: 3-foot dedication along 8th Street to provide half right of way width of 33 feet and all roadway modification requirements; 8-foot dedication along Lemon Street to provide half right of way width of 33 feet and all roadway modification requirements; 1-foot dedication along Lawrence Street to provide half right of way width of 33 feet and all roadway modification requirements; 1-foot dedication along Hunter Street to provide half right of way width of 33 feet and all roadway modification requirements; removal and replacement of all non-standard sidewalks along Project frontages; and roadway modification requirements along Alameda Street and Olympic Boulevard. With approval of such requests, the Project would not conflict with this provision of the LAMC or the Mobility Plan.

Vision Zero

Vision Zero implements projects that are designed to increase safety on the most vulnerable City streets. The City has identified a number of streets as part of the High Injury Network (HIN) where City projects will be targeted. The Project Site is located along Olympic Boulevard, which is identified as part of the HIN. However, the Project is not proposing access to or from Olympic Boulevard. Moreover, the Project would not include alterations or improvements to the public right of way, and therefore would not preclude future potential Vision Zero safety improvements by the City along Olympic Boulevard or the other roadways adjacent to the Project Site, should they be deemed necessary. Thus, the Project would not conflict with Vision Zero.

Streetscape Plans

There are no streetscape plans adjacent to the Project Site. Therefore, streetscape plans do not apply to the Project.

Citywide Design Guidelines for Residential, Commercial, and Industrial Development

The Citywide Design Guidelines identify urban design principles to guide architects and developers in designing high-quality projects that meet the City's functional, aesthetic, and policy objectives and help foster a sense of community.[230] The design guidelines related to circulation include the following:

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

As described in Section 2, Project Description, of this IS/MND and above, the Project would enhance the streetscape adjacent to the Project Site by implementing a design that would enhance the pedestrian experience. Additionally, as described in Section 2, Project Description, of this IS/MND and above, the Project would provide trees and other landscaping and open space areas, as well as adequate lighting for security and wayfinding purposes, within the Project Site. These Project elements would promote a safe, comfortable, and accessible pedestrian experience for all, both within and adjacent to the Project Site, and the Project would not conflict with this guideline.

[230] City of Los Angeles Department of City Planning, Urban Design Studio, Citywide Design Guidelines, October 2019.

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

As described in Section 2, Project Description, of this IS/MND and above, the Project would provide separate pedestrian entrances to ensure safe pedestrian access separate from vehicular activity. As described in Section 2, Project Description, of this IS/MND and above, the Project would provide within the Project Site new trees and other landscaping and open space areas, and pedestrian friendly amenities such as wayfinding signs, and adequate lighting for security and wayfinding purposes. Vehicular access to the Project's parking would be provided via a two-way driveway main entrance along 8th Street at the northern portion of the Project Site, with a main guard booth and a pedestrian guard booth. In addition, both existing and proposed exit-only gates would be located throughout the Project Site. Two proposed exit-only gates would be located on Hunter Street; one existing exit-only gate would remain as such on Lemon Street; and two existing exit-only gates would remain on Lawrence Avenue and East Olympic Boulevard but would not be utilized for regular vehicular access. In addition, trucks would also have separate entrances and exits. Specifically, a truck guard booth (Guard Booth 7C) and truck entrance would be added within the southeast corner of the Project Site on Lemon Street. Trucks would then exit onto Lemon Street via an existing gate that would be widened as part of the Project.. A delivery/loading zone is also proposed on Lawrence Street, in the southwest portion of the Project Site, adjacent to Building 1. The proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate. Therefore, the Project would not conflict with this guideline.

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

As a private studio campus with controlled access, guard booths, and a fenced perimeter, the Project would not seek to actively engage with streets and public space or maintain human scale but would nevertheless improve the adjacent streetscape and engage the streets and pedestrian experience. As described in Section 2, Project Description, of this IS/MND and above, the Project would provide identifying signage that would be visible from vehicular and pedestrian traffic. In addition, signage for the display of on-site productions would be proposed throughout the Project Site on the exterior of buildings fronting the public right-of-way. All proposed signage would be designed to be aesthetically compatible with the existing and proposed architecture of the Project Site and would comply with all Los Angeles Municipal Code and sign ordinances. The Project would also enhance the street and pedestrian experience by retaining 45 existing street trees and planting 19 new street trees. Therefore, the Project would not conflict with this guideline.

Based on the assessment set forth above, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, the Project's potential impacts would be less than significant, and no mitigation measures are required.

b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. Section 15064.3 of the CEQA Guidelines describes specific considerations for evaluating a project's transportation impacts. As set forth therein, for land use projects, VMT exceeding an applicable threshold of significance may indicate a significant impact. As discussed above, the

Transportation Assessment was prepared in accordance with the assumptions, methodologies, and procedures outlined in the LADOT TAG. The TAG states that a commercial project would result in a potential VMT impact if it would generate work vehicle miles traveled (VMT) per employee exceeding 15 percent below the existing average work VMT per employee for the Area Planning Commission (APC) area in which the project is located. Specifically, as identified in the Transportation Assessment, the Project Site is located in the Central APC area and is subject to the VMT impact threshold of 7.6 daily work VMT per employee.

In order to determine vehicle trips and VMT, the Transportation Assessment utilized the City of Los Angeles VMT Calculator Version 1.3. The VMT Calculator defines other types of trips generated by the Project, which include Non-Home-Based Other Production (trips to a non-residential destination originating from a nonresidential use at the Project Site), Home-Based Other Attraction (trips to a non-workplace destination at the Project Site originating from a residential use), and Non-Home-Based Other Attraction (trips to a non-residential destination at the Project Site originating from a non-residential use). These trip types are not factored into the VMT per capita and VMT per employee thresholds, because these trip types are typically localized and are assumed to have a negligible effect on the VMT impact assessment. However, to ensure a conservative analysis for the Project, these trip types were factored into the calculation of total Project VMT for screening purposes when determining whether VMT analysis for the Project would be required.

The VMT Calculator also considers four types of Travel Behavior Zones (TBZs) to determine the magnitude of VMT and vehicle trip reductions that could be achieved through TDM strategies. The development of the TBZs considered the population density, land use density, intersection density, and proximity to transit of each Census tract in the City and are categorized as Suburban (Zone 1), Suburban Center (Zone 2); Compact Infill (Zone 3); and Urban (Zone 4). The VMT Calculator determines a project's TBZ based on the latitude and longitude of a project address. As identified in the Transportation Assessment, the Project Site is located in a Suburban Center (Zone 2) TBZ, which is described as comprised of low-density developments with a mix of residential and commercial uses with larger blocks and lower intersection density.

Based on a review of relevant empirical and historical data, and in consultation with LADOT, it was determined that the daily trip generation characteristics and patterns of the Project's employee-based creative office and studio-related land uses were similar in scope and behavior to the characteristics of the general office land use. As such, in order to evaluate the VMT generated by the Project's studio-related land uses, which are not land use categories recognized within the VMT Calculator, an office floor area equivalency calculation was conducted based on a comparison of the daily trip generation estimates. In addition, the VMT Calculator accounted for the Project's TDM measures, which include bicycle parking spaces, a bicycle repair station, and shower facilities for cyclists.

As discussed above, the Project would comply with requirements of the City's TDM ordinance by implementing a TDM program, which would include measures in addition to the aforementioned bicycle-related measures. However, for the purposes of providing a more conservative analysis with the VMT Calculator, no further VMT reductions were applied to account for the TDM strategies associated with the Project's TDM program. Based on the VMT Calculator results (see Appendix D of the Transportation Assessment), the Project would generate 15,499 daily work VMT. Thus, the Project would generate work VMT per employee of 7.4, which falls below the significance thresholds for the Central APC (i.e., 7.6 work VMT per employee).

Therefore, Project-level potential impacts with regard to VMT pursuant to CEQA Guidelines Section 15064.3 and LADOT TAG would be less than significant, and no mitigation measures would be required.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. Impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from a project site, and may include safety, operational, or capacity impacts. Impacts can be related to vehicle/vehicle, vehicle/bicycle, or vehicle/pedestrian conflicts as well as to operational delays caused by vehicles slowing and/or queuing to access a project site. These conflicts may be created by the driveway configuration or through the placement of project driveway(s) in areas of inadequate visibility, adjacent to bicycle or pedestrian facilities, or too close to busy or congested intersections. Based on the TAG, further evaluation is required for projects that require a discretionary action and (1) propose new driveways or introduce new vehicle access to the property from a public right-of-way or (2) propose any voluntary or required modifications to the public right-of-way (i.e., street dedications, reconfigurations of curb line, etc.). The Project requires further evaluation based on these screening criteria.

As described in Section 2, Project Description, of this IS/MND and above, primary vehicular access to the Project Site would be provided via driveways along 8th Street, Lemon Street, and Hunter Street, which are all designated Collector Streets. The main gate driveway, which provides full access to the Project Site, and the outbound only driveway, which provides access from the parking structure, would be located on 8th Street. Two additional secondary outbound-only driveways would be located on Hunter Street. Separate truck-only inbound and outbound driveways are proposed on Lemon Street. All driveways would be designed according to LADOT standards and reviewed by the City Bureau of Engineering during site plan review.

The main gate driveway along 8th Street and the truck-only outbound driveway along Lemon Street would improve existing curb cuts to meet City standards and Project needs. The truck-only inbound driveway along Lemon Street, as well as the outbound-only driveways along 8th Street and Hunter Street, would require the installation of new curb cuts. The proposed driveways to the Project Site would not be located along curved sections of the roadways that may limit sight distance. In addition, the Project would not propose any driveways or curb cuts along any streets identified as part of the City's High Injury Network (HIN). On-street parking adjacent to the driveways would be prohibited, thus maximizing sight distance at the Project driveways. All driveways that provide truck access would be designed to adequately accommodate truck turning maneuvers without encroachment into the public right-of-way. The driveways and access control systems would be designed, placed, and configured to limit vehicle queues and bicycle/pedestrian-vehicle conflicts. Thus, the Project's driveway plans would not substantially increase vehicle/vehicle conflicts along 8th Street, Lemon Street, or Hunter Street, and based on the site plan review, would not present geometric design hazards as it relates to traffic movement.

The Project frontages would be designed with landscaped setbacks to allow better visibility between vehicles accessing the driveways and pedestrians/bicyclists. In addition, separated pedestrian and bicycle access would be provided at the main gate along 8th Street, and none of the Project driveways would cross any existing bicycle lanes or routes. The Project driveways would be designed and placed to provide adequate sight distance and pedestrian refuge areas to limit potential vehicular-bicycle or

vehicular-pedestrian conflicts. Based on the Project's site plan and design, the Project would not result in geometric design hazards related to mobility or pedestrian accessibility.

With regard to freeway safety, LADOT's Freeway Guidance requires that a transportation assessment for a development project include analysis of any freeway off-ramp where the project adds 25 or more peak hour trips. A project would result in a significant impact at such a ramp if each of the following three criteria were met: 1) Under a scenario analyzing future conditions upon project buildout, with project traffic included, the off-ramp queue would extend to the mainline freeway lanes; 2) A project would contribute at least two vehicle lengths (50 feet, assuming 25 feet per vehicle) to the queue; and 3) The average speed of mainline freeway traffic adjacent to the off-ramp during the analyzed peak hour(s) is greater than 30 mph. Based on the Project's trip generation estimates and traffic distribution pattern, the Project would add 28 morning and 19 afternoon peak hour trips to the I-10 Westbound Off-Ramp to Enterprise Street. Thus, in accordance with the LADOT Freeway Guidance, conditions were further analyzed with and without Project traffic under future cumulative conditions for Year 2026 (the anticipated Project buildout), and included ambient growth and traffic from other related projects in the vicinity of the Project. As detailed in the Transportation Assessment, under Future with Project Conditions, although the Project would add more than 50 feet to the off-ramp queue during both the morning and afternoon peak hours, the queues would not exceed the ramp storage length during either peak hour. Thus, the Project would not result in a significant freeway safety impact.

In addition, the proposed uses would also be consistent with the surrounding uses (i.e., industrial and commercial) and would not introduce hazards due to incompatible uses. Therefore, based on the above, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses. The Project's potential impacts would be less than significant, and no mitigation measures are required.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. Construction activities associated with the Project could potentially impact the provision of emergency services by the LAFD and the LAPD in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. In particular, according to the Safety Element of the City of Los Angeles General Plan, the nearest disaster routes to the Project Site include Alameda Street, which is located adjacent to the Project Site, and the I-10, which is located 0.3 mile south of the Project Site.[231,232] Response times could temporarily increase for emergency vehicles traveling along streets adjacent to the Project Site and main connectors due to travel time delays caused by traffic during the Project's construction phase. However, with implementation of the Construction Management Plan in accordance with Project Design Feature TR-PDF-1 below, which is incorporated into the Project, emergency access would not be impeded. Furthermore, construction activities are expected to be primarily contained within the Project Site boundary with no encroachment into or closures on the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site. Therefore, Project-adjacent parking lanes and sidewalks along 8th Street and Hunter Street would not be affected by construction activities or the staging of construction materials and equipment.

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

[232] County of Los Angeles Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area, August 2008.

As described in Section 2, Project Description, of this IS/MND and above, with regard to operation, the Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from the surrounding streets. The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding area would be maintained during operation of the Project.

Therefore, the Project would not result in inadequate emergency access to the Project Site or surrounding uses. The Project's potential impacts regarding inadequate emergency access would be less than significant, and no mitigation measures are required.

Project Design Feature

Project Design Feature TR-PDF-1: Prior to the start of construction, the Project Applicant will prepare a Construction Management Plan, including haul routes and a staging plan, and submit it to the City for review and approval. The Construction Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and will include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- Prohibition of construction worker or equipment parking on adjacent streets;
- Prohibition of haul truck staging on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route;
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets;
- Containment of construction activity within the Project Site boundaries;
- Implementation of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours;
- Spacing of trucks so as to discourage a convoy effect;
- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind;
- Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day;
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities

posted at the site readily visible to any interested party during site preparation, grading, and construction.

XVIII. 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:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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), or	☐	☒	☐	☐
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.	☐	☒	☐	☐

The following analysis is based on the Tribal Cultural Resources Report (TCR Report) prepared for the Project by Dudek, dated January 2022 and included as Appendix IS-12 of this IS/MND. The impact analysis is also based on a Sacred Lands File (SLF) records search conducted by the California Native American Heritage Commission (NAHC) and a California Historical Resources Information System (CHRIS) records search conducted by the South Central Coastal Information Center (SCCIC) at California State University Fullerton, both of which are appended to the TCR Report, as well as consultation with the Gabrieleño Band of Mission Indians—Kizh Nation pursuant to AB 52. The record and results of the November 30, 2021, AB 52 consultation process with the applicable Native American tribes are also included therein.

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: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

b. 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 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?

Less Than Significant Impact with Mitigation Incorporated. As part of the TCR Report, Dudek requested a CHRIS records search from the SCCIC for the Project Site and a 0.5-mile radius around the Site. The CHRIS records search results provided by the SCCIC included their digitized collections of mapped prehistoric and historic archaeological resources and historic built environment resources; Department of Parks and Recreation site records; technical reports; archival resources; and ethnographic references. Additional consulted sources included historical maps of the Project Site, NRHP, CRHR, the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility. Dudek reviewed the SCCIC records to determine whether the implementation of the Project would have the potential to impact known cultural resources identified in the records search. The SCCIC summary of the records search results is also provided in Confidential Appendix A of the TCR Report. As also detailed above in Checklist Question No. V, one identified cultural resources report, LA-13239, overlaps with a portion of the Project Site. Report LA-13239 was prepared by Cogstone Environmental and identifies the extent of the zanja network in the general vicinity of the Project Site. However, no prehistoric sites or resources documented to be of specific Native American origin have been previously recorded within the SCCIC records search area of the Project Site.

As part of the process of identifying cultural resources within or near the Project, Dudek also contacted the NAHC on February 15, 2021, to request a review of the SLF records. As provided in Appendix C of the TCR Report, the NAHC replied via email on March 1, 2021, stating that the SLF search was completed with negative results. Because the SLF search does not include an exhaustive list of Native American cultural resources, the NAHC suggested contacting Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the Project Site.

In compliance with AB 52 (PRC 21074), which requires tribal consultation as part of the CEQA process, the City initiated consultation in August 2021. On October 12, 2021, the City received a request for consultation from Chairman Andrew Salas, a representative of the Gabrieleño Band of Mission Indians—Kizh Nation. Consultation occurred on November 30, 2021, consisting of a call between the City and Kizh Nation representatives regarding the Project. As discussed in more detail in Appendix IS-12, the Kizh Nation asserted that the area was sensitive for tribal cultural resources based on ethnographic and historical documentation of past Native American use and the potential for unanticipated buried TCRs to be present. The Kizh Nation provided documentation to the City via email, including excerpts from literature referenced, screenshots of historical maps, and screenshots and letters from the SCCIC and NAHC that discuss how archaeological and Native American resources are identified through the CHRIS and SLF databases. The Kizh Nation did not provide explanatory text for any of the historical maps or twelve unidentified pages from literary sources, but the sources appear to be in reference to the rancherias and villages that existed within the general area around the Project Site, though specificity on how this information relates to the Project Site, itself, was not provided. In addition to these files, the Kizh Nation provided a letter from Dr. Stickel that discusses the purported inadequacy of conducting an archaeological pedestrian survey for the identification of subsurface cultural material and the alleged

reliability of the use of ground penetrating radar GPR for identifying cultural material, and then provides a statement to support the use of monitoring. Chairman Salas also included a screenshot of an email from NAHC analyst, Frank Lienert, which stated that negative Sacred Lands File Searches do not preclude the existence of sites within the search area, which is explicitly stated on all negative Sacred Lands File Search results. The Kizh Nation also provided the City with AB 52 regulatory information, including mitigation language for consideration for the management of TCRs based on this information. To date, no additional responses have been received from the Kizh Nation regarding TCRs or other concerns about the Project and it is assumed that consultation will be timely concluded in accordance with AB 52. The confidential record of AB 52 consultation is provided in Confidential Appendix D of the TCR Report.

In addition, Dudek reviewed relevant sources of academic and ethnographic literature for information pertaining to any potential past Native American use of the Project Site and vicinity. This review included sources identified in the past in the tribal consultation process regarding sites in the general vicinity of the Project Site, notably the 1938 Kirkman-Harriman Historical Map often referenced by the Gabrieleño Band of Mission Indians-Kizh Nation (Figure 3 of the TCR Report), which has been marked up to show the general location of the Project Site relative to features identified on the 1938 Kirkman-Harriman historical map. Based on this map, the Project Site is south of an area where several trails diverged. The trails closest to the Project Site include a route labeled as “very ancient trail,” the Road of 1810, the Old Salt Road, and La Brea Road. These trails intersect with other trails at the historic location of the El Pueblo de Los Angeles, mapped approximately 2.5 miles to the north of the Project Site. Accounts from this early Euro-American settlement suggest that the Pueblo was located near the prehistoric Gabrieleño village Yanga, although the exact location of this village is unconfirmed, and would have shifted to different locations over time. While the specific routes would likely have varied throughout human prehistory based on changing topographic and environmental conditions, regional evidence from known archaeological sites clearly documents wide-spread patterns of exchange in goods and resources between neighboring tribes. Outside of areas with specific geographic or topographic constraints, prehistoric trails represented on this map should be interpreted as a cartographer’s tool for generally describing these connections between known habitation areas, and not specific or confirmed prehistoric routes of travel. This map is highly generalized due to scale and age and does not precisely indicate the relative distance and location of mapped features. Additionally, the 1938 map was prepared more than 100 years following the end of the establishment of the California missions (in 1833) and includes no primary references. While the map is a valuable representation of post-mission history, substantiation of the specific location and uses of the represented individual features would require archaeological or other primary source documentation on a case-by-case basis.

Dudek also reviewed maps of documented areas of Gabrieleño traditional use that have been informed by ethnographic and archaeological evidence and mission records (see Figures 4 through 7 of the TCR Report). As described in the TCR Report, the nearest village site to the Project was Yabit (also recorded as Yanga or Yangna). Mission records indicate that 179 Gabrieleño inhabitants of Yanga became members of San Gabriel Mission, indicating that it may have been the most populated village in the Western Gabrieleño territory. In general, the mapped position of this village at some point in time has been substantiated through archaeological evidence, although the archaeological record has been substantially compromised by subsequent historic period urbanization throughout the general area. Notably, there is no conclusively defined location of the village of Yanga, and it more than likely represented series of habitation areas that extended from the prehistoric period into the post-Spanish era. Archaeological evidence has suggested that the village of Yanga may have been located anywhere between the current Dodger’ Stadium (2.8 miles northwest of the Project Site) and the Bella Union Hotel (1.8 miles north of the Project Site; constructed circa 1835 and renovated circa 1870), with the village

likely centered approximately 2 miles to the north of the Project Site in the vicinity to present-day Union Station (constructed circa 1939). Technical studies completed for the Los Angeles Rapid Transit project are perhaps the most informative with regard to the distribution of archaeological discoveries in this area. Cultural material indicative of habitation activities characteristic of a village such as Yanga have been documented throughout this area, though these materials have been more extensively documented within approximately 1,000 feet surrounding Union Station, located approximately 2 miles north of the Project Site. While this may be partially the result of a greater relative amount of archaeological research, the evidence suggests that this particular area was subject to more intensive prehistoric and historic-era use (notably Spanish/Mexican period). The broader area now occupied by Downtown Los Angeles would have been used by Native American inhabitants, and the location of the village of Yanga would have shifted to multiple locations based on its suitability relative to the route of the meandering Los Angeles River over thousands of years. Spanish/Mexican inhabitants who settled the area were undoubtedly situated in areas prehistorically occupied by the Gabrieleño. The ethnographic research cited in in the TCR Report indicates that after the founding of Los Angeles, the Native American settlement of Yanga was forcibly moved, and by 1813 Native Americans in the area had regrouped to the south. This new village, known as Rancheria de los Poblanos, was located near the northwest corner of Los Angeles and First Street, approximately 1.6 miles northwest of the Project Site. This second habitation area was only occupied until about 1836, after which Native American communities in Los Angeles were relocated again east of the Los Angeles River. After 1836, Native Americans were again forcibly relocated another three times to other locations, in 1845, 1846, and 1847. An additional historical-era Native American ranch was documented as Rancheria de los Pipimares (translating as the "Ranch of the Island Indians"), which is thought to have likely been located in the area of San Pedro and 7th Street (0.9 mile northwest of the Project Site), between 1820 and 1946. This ranch had a high relative population of Native Americans from the Channel Island communities, and there are historical accounts by Euro-Americans of traditional mourning ceremonies being held by the inhabitants of this ranch.

As discussed in the TCR Report, based on review of pertinent academic and ethnographic information, the Project falls within the boundaries of the Gabrieleño/Tongva traditional use area. However, the Project site and surrounding neighborhood have been subject to extensive development throughout the twentieth century, and the character and severity of this past disturbance suggests that subsurface soils are likely unsuited to support the presence of intact tribal cultural resources. As such, Dudek concluded that while substantial documentation is provided regarding the use of the broader area by Native American inhabitants throughout the past, no tribal cultural resources have been previously documented in areas that may be impacted by the Project. Therefore, the Project's impact on tribal cultural resources would be less than significant.

Based on the results of the government-to-government consultation between the City and the Kizh Nation, the City, acting in good faith and after a reasonable effort, in addition to the independent investigation of record repositories and historic sources reflected in the TCR Report, is unable to identify any specific tribal cultural resources within or near the Project Site. As discussed in the TCR Report, taken together, the information provided during consultation does not identify any tribal cultural resources on the Project Site, nor does it provide substantial evidence of the potential for the Project to encounter TCRs during the construction process. Given that no substantial evidence of tribal cultural resources has been identified that could be affected, no specific mitigation for tribal cultural resources appears to be necessary. Furthermore, as previously discussed, Dudek completed a separate Archaeological Resources Report for this Project, resulting in the inclusion of Mitigation Measure CUL-MM-1 in this IS/MND, which would require that a Workers Environmental Awareness Program (WEAP) pre-construction training and periodic archaeological monitoring be completed within native soils that have the potential to contain intact cultural

deposits or material. As stated in the TCR Report, this mitigation would appropriately address any potential impacts associated with the inadvertent discovery of cultural resources and, should such a cultural resource represent a potential tribal cultural resources, this mitigation would also effectively address impacts associated with such inadvertent discovery.

Notwithstanding, given the past history of Native American occupation in the Los Angeles area and greater southern California region, and in light of the general proximity of the Project site to known villages, roads, and the Los Angeles River, as well as the input from the tribal representatives, it is concluded that Project construction activities could potentially unearth or otherwise disturb buried tribal cultural resources. As such, out of an abundance of caution to provide maximum protection against inadvertent encounters with previously unidentified tribal cultural resources, the Project shall incorporate the following mitigation measures. With implementation of the mitigation provided below, any potential impacts to tribal cultural resources would be less than significant.

Mitigation Measure TRI-MM-1: Prior to the issuance of a demolition permit, the Applicant shall retain a Native American Monitor from the Gabrieleño Band of Mission Indians–Kizh Nation (Kizh Nation or Tribe) who shall be present during construction ground disturbance activities, including demolition, pavement removal, clearing/grubbing, drilling/augering, potholing, grading, trenching, excavation, tree removal or other ground disturbing activity associated with the Project. The activities to be monitored may also include off-site improvements in the vicinity of the Project site, such as any ground disturbing activities associated with utilities, sidewalks, or road improvements. A monitoring agreement between the Applicant and Kizh Nation shall be prepared that outlines the roles and responsibilities of the Native American Monitor and shall be submitted to the City prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. The Native American Monitor shall also provide a Workers Environmental Awareness Program (WEAP) training to construction personnel as required by Mitigation Measure MM-CUL-1. The Native American Monitor, in coordination with the qualified Archaeologist and archaeological monitor as identified in Mitigation Measure MM-CUL-1, shall have the authority to direct the pace of construction equipment activity in areas of higher sensitivity and to temporarily divert, redirect or halt ground disturbance activities to allow identification, evaluation, and potential recovery of tribal cultural resources. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Native American Monitor in the event there appears to be little to no potential for impacting tribal cultural resources. Native American monitoring shall conclude upon the latter of the following: (1) written confirmation to the Kizh Nation from a designated point of contact for the Applicant or Lead Agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the Project Site or in connection with the Project are complete; or (2) a determination and written notification by the Kizh Nation to the Project Applicant/Lead Agency that no future, planned construction activity and/or development/construction phase at the Project site possesses the potential to impact tribal cultural resources.

Mitigation Measure TRI-MM-2: The Native American Monitor shall complete daily monitoring logs that provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe

any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the Project Applicant/Lead Agency upon written request to the Tribe.

Mitigation Measure TRI-MM-3: In the event that prehistoric/Native American (e.g., hearths, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Native American Monitor and archaeological monitor in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making and evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. A meeting shall take place between the Applicant, the qualified Archaeologist, the Gabrieleño Tribe, and the City to discuss the significance of the find and whether it qualifies as a tribal cultural resource pursuant to Public Resources Code Section 21074(a). If, as a result of the meeting and after consultation with the Gabrieleño Tribe and the qualified Archaeologist, a decision that the resource is in fact a tribal cultural resource, a treatment plan shall be developed by the Gabrieleño Tribe, with input from the qualified Archaeologist as necessary, and with the concurrence of the City's Planning Director or his/her designee. The treatment measures in the treatment plan shall be implemented prior to construction work continuing in the buffer around of the find. The preferred treatment is avoidance, but if not feasible may include, but would not be limited to, capping in place, excavation and removal of the resource and follow-up laboratory processing and analysis, interpretive displays, sensitive area signage, or other mutually agreed upon measures. The treatment plan shall also include measures regarding the curation of the recovered resources. The recovered prehistoric or Native American resources may be placed in the custody of the Gabrieleño Tribe, who may choose to use them for their educational purposes or they may be curated at a public, non-profit institution with a research interest in the materials. If neither the Gabrieleño Tribe or institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. 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?	☐	☐	☒	☐
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. Water and electrical service to the Project Site is provided by the Los Angeles Department of Water and Power (LADWP), sewer service is provided by LA Sanitation & Environment (LASAN), stormwater drainage is overseen by the LADWP, and natural gas service is provided by SoCalGas. In addition, electricity transmission to the Project Site is provided and maintained by LADWP, natural gas service is provided to the Project Site by the SoCalGas, and telecommunications services are provided by AT&T, DirecTV, Dish Network, Frontier Communications, Charter Spectrum, and Verizon. These services are provided by existing water, sewer, electrical, natural gas and telecommunications infrastructure currently extending to the Project Site from existing mains and distribution lines within the right-of-way of the surrounding roads, and by existing on-site storm drainage infrastructure.

Water

The following analysis of water infrastructure is based on the Water and Wastewater Infrastructure Study prepared by DEA, dated December 2021 and included in Appendix IS-13. While domestic water demand is typically the main contributor to operational water consumption, water infrastructure capacity is analyzed based on the Project's fire flow demands, which are short-term but typically exponentially larger than daily operational water demands, and therefore, have a much greater instantaneous impact on infrastructure.

As discussed in the Water and Wastewater Infrastructure Study, with regard to water infrastructure, existing Buildings 1 and 2 would continue to be served by the existing 10-inch and 4-inch service in 8th

Street. Proposed Buildings 3, 4 and 5 would be served by a proposed 4-inch service in Alameda Street. Proposed Building 7 would be served by a proposed 4-inch service in 8th Street. Proposed Building 8 would be served by a proposed 4-inch service in 8th Street. Installation of the infrastructure would be completed by LADWP and would include new hot taps, laterals, and detector checks for the meter. Fire service water would be piped into the buildings from the meter. Backflow preventers, fire water tanks and fire pumps would be documented on the plumbing drawings. Pressure regulators would be installed where the pressures exceed 80 psi at the building pad elevation as required in accordance with the Los Angeles City Plumbing Code. Large service vaults and backflow preventers would be installed on private property with full access given the LADWP for maintenance. Installation of the new infrastructure would occur during construction of the Project, the impacts of which are assessed throughout this IS/MND.

Service Advisory Requests (SARs) were submitted to LADWP to test the proposed water connections serving the Project Site. A SAR was also obtained for the existing mains in both Olympic Boulevard and Lemon Street to test the available flow and pressure should they be needed to serve the Project. Based on the SARs that were approved by the City in March 2021, the existing and proposed water infrastructure can meet the water infrastructure needs of the Project. In addition, Project-related infrastructure would be designed and installed to meet all applicable City requirements. Thus, with the proposed improvements identified in the Water and Wastewater Infrastructure Study, the water infrastructure system would be adequate to serve the Project Site.

With regard to fire flows, as discussed above, according to the Water and Wastewater Infrastructure Study, a total of 12 existing public fire hydrants are adjacent to the Project and additional hydrants exist in the near vicinity. In addition, six existing private fire hydrants are on-site. As set forth in the Water and Wastewater Infrastructure Study, according to the LAFD, the total fire flow requirement would be 4,500 gallons per minute (gpm) @ 20 psi and three private fire hydrants would be required at a rate of 1,500 gpm @ 20 psi per hydrant. As concluded by LAFD, based on the SAR and Fire Flow Availability Reports prepared for the Project by LADWP, fire flow for the Project would be adequate.[233] The installation of these additional hydrants would be accomplished during construction of the Project, the impacts of which are assessed throughout this IS/MND. Therefore, the Project would not necessitate the construction of new water infrastructure facilities or the expansion of existing facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant and no mitigation would be required.

Wastewater

The following analysis of wastewater is based on the Water and Wastewater Infrastructure Study prepared by DEA, dated December 2021 and included as Appendix IS-13. Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant. The Hyperion Water Reclamation Plant has a capacity of 450 mgd and current wastewater flow levels are at 275 mgd.

As described in the Water and Wastewater Infrastructure Study included in Appendix IS-13, a Sewer Capacity Availability Report (SCAR) application was submitted to address discharge of the Project's

[233] Written communication from Inspector Robert Duff, Los Angeles Fire Department, December 16. 2021. Refer to Appendix IS-13 of this IS/MND.

wastewater demand between four of the seven existing adjacent sewer mains. The purpose of the SCAR is for the City to evaluate the existing public sewer systems to determine if adequate capacity is available to safely convey sewage from proposed development projects. Using sewage generation factors established by Department of Public Works, Bureau of Engineering, the SCAR application prepared by DEA estimates that the Project would generate approximately 103,995 gallons per day or approximately 0.104 million gallons per day of wastewater upon completion.

As set forth in the Water and Wastewater Study, with regard to wastewater infrastructure, Building 1 would continue to be served by existing 8-inch mains in 8th Street and Lemon Street. Building 2 would continue to be served by existing 8-inch main in Lemon Street. Building 3 would be served by a proposed 4-inch house connection to an 8-inch main in Hunter Street. Building 4 would be served by the same proposed 4-inch house connection to the 8-inch main in Hunter Street or the 8-inch main in Alameda Street. Building 5 would be served by both a proposed 4-inch connection to the 8-inch main in 8th Street and the 4-inch connection to the 8-inch main in Hunter Street. Building 6 would be served by a 4-inch connection to the 8-inch main in 8th Street. Building 8 would be served by a 4-inch connection to the 8-inch main in 8th Street.

As set forth in the approved SCAR included as part of the Water and Wastewater Infrastructure Study, the City has approved the Project to discharge up to 103,995 gallons per day and the wastewater system would be able to accommodate the Project based on the wastewater connections described above. Specifically, the SCAR accounts for the proposed uses of the site and does not anticipate additional capacity is needed for water uses such as cooling towers and landscaping. Therefore, sufficient capacity exists in the sewer system after accounting for required water savings and taking into account water uses that do not directly discharge to the sanitary sewer system. Thus, impacts associated with wastewater infrastructure would be less than significant, and no mitigation is required.

Stormwater

As previously discussed under Checklist Question No. X, Hydrology and Water Quality, the existing drainage pattern would be retained under the Project, with the on-site storm drain network capturing flow from the entire site including the existing roof drainage of both the Plant and vehicular maintenance building, and sheet flow from the surface parking lot. The existing underground 12-foot arched storm drain main conveys all flow from the site. The on-site 12-foot arched storm drain main, and any existing laterals on-site, would be protected in place. The redeveloped site would convey surface and roof drainage to several proposed on-site infiltration drywells located throughout the Project Site, overflowing to the on-site storm system that conveys flow into the 12-foot arched storm drain main. Furthermore, the Project would only enhance the existing on-site portion of the drainage infrastructure to serve the proposed improvements—no improvements to the off-site storm drain system would be required. Lastly, while excavation would be required for the proposed drywells, they would serve only the Project and the environmental effects of this excavation (e.g., air quality, noise, etc.) are assessed in the construction impact analyses throughout this IS/MND. Therefore, the Project would not necessitate the construction of new stormwater drainage facilities or the expansion of existing facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant. Impacts would be less than significant, and no mitigation measures are required. See Checklist Question No. X, Hydrology and Water Quality, of this IS/MND for further discussion.

Electricity and Natural Gas

Electricity transmission to the Project Site is provided and maintained by LADWP through a network of utility poles and underground utility lines. Natural gas service is provided to the Project Site by the SoCalGas.

Construction of the Project's electrical infrastructure would primarily occur within the Project Site with the possible need for off-site connections to the electrical system adjacent to the Project Site. Where feasible, the new electrical service installations and connections would be scheduled and implemented in a manner that would not result in electrical service interruptions to other properties. The Applicant would also be required to coordinate electrical infrastructure removals or relocations with LADWP and comply with site-specific requirements set by LADWP, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within LADWP easements are minimized. As such, construction of the Project's electrical infrastructure is not anticipated to adversely affect the electrical infrastructure serving the Project Site and surrounding uses or utility system capacity.

Since LADWP has been serving the Project Site's existing uses, construction of the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, construction-related impacts to electricity supply and infrastructure would be less than significant, and the use of electricity during project construction would not be wasteful, inefficient, or unnecessary.

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. However, the Project would involve installation of new natural gas connections to serve the Project Site. Since the Project Site is located in an area already served by existing natural gas infrastructure, the Project would likely not require extensive infrastructure improvements to serve the Project Site. Construction impacts associated with the installation of natural gas connections are expected to be confined to trenching in order to place the lines below the surface. Prior to ground disturbance, Project contractors would notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. Adequate and safe vehicular and pedestrian access within the Project Site and immediately surrounding the Project Site would also be maintained in accordance with a construction management plan to be implemented for the Project. Therefore, construction of the Project would not result in an increase in demand for natural gas that would affect available supply or distribution infrastructure capabilities and would not result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Construction-related impacts to natural gas supply and infrastructure would be less than significant.

As detailed above under Checklist Question No. VI, with buildout of the Project, the on-site electricity demand would increase by approximately 2,149,680 kWh of electricity per year. The Project's electricity demand would represent approximately 0.01 percent of LADWP's projected sales in 2026. LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area.[234] As discussed above, the Project would also incorporate a variety of energy conservation measures to reduce

[234] LADWP, Will Serve, 820 South Alameda Street, dated March 3, 2021. Refer to Appendix IS-5 of this IS/MND.

energy usage as set forth by Los Angeles Green Building Code, and CalGreen/Title 24. These measures would include enhanced insulation, energy efficient ventilation systems, double paned windows and use of light emitting diode (LED) lighting where appropriate. Therefore, it is expected that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand. In addition, the Project would consume an estimated 1,019,155 cubic feet of natural gas annually (2,792 cubic feet per day). The Project's natural gas demand would represent approximately 0.001 percent of SoCalGas's forecasted natural gas supply in 2026. SoCalGas has confirmed that the Project's natural gas demand can be served by the facilities in the Project area.[235] Therefore, it is anticipated that SoCalGas' existing and planned natural gas supplies would be sufficient to support the Project's demand for natural gas.

Therefore, construction and operation of the Project would not result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant, and no mitigation measures are required.

Telecommunications

With respect to telecommunications facilities, the Project would require installation of new on-site telecommunications infrastructure to serve new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure. Communication and television cable systems located in the Project area include underground fiber optic cable, telephone transmission lines (overhead and underground), and cellular towers owned or leased by telecommunications service providers. It is assumed that all such infrastructure exists on or otherwise serves the Project Site. Installation would occur during construction of the Project. Impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. However, the Project would ensure vehicle and pedestrian access is maintained throughout construction. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers and the City as applicable. As such, the Project would not require or result in the relocation or construction of new or expanded telecommunications facilities. Impacts would be less than significant, and no mitigation measures are required.

Conclusion

Based on the above, the Project is not anticipated to exceed the available capacity of the utility distribution/collection infrastructure and wastewater treatment infrastructure currently serving the Project Site. Therefore, the Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or

[235] SoCalGas, Will Serve—820 S. Alameda St Los Angeles, CA 90021, dated March 9, 2021. Refer to Appendix IS-5 of this IS/MND.

telecommunications facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant, no mitigation is required, and no further discussion in an EIR is required.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact.

LADWP provides water service to the Project Site. Water is supplied to the City from four primary sources: the Los Angeles Aqueducts, local groundwater, the Metropolitan Water District of Southern California (MWD), and recycled water. LADWP's 2020 Urban Water Management Plan provides water supply and demand projections in five-year increments to 2045, based on the demographic growth projections in SCAG's 2020–2045 RTP/SCS. The 2020 Urban Water Management Plan takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. Based on LADWP's 2020 Urban Water Management Plan water demand projections through 2040, projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2045, as well as the intervening years (i.e., the Project buildout year of 2026).[236]

A Water Supply Assessment (WSA) was approved for the 8th and Alameda Project by the LADWP Board of Commissioners on December 14, 2021, and is included in Appendix IS-14.[237] According to the WSA, and as shown in Table 21 on page 210, the projected total net water demand increase for the Project is estimated to be 129 acre-feet annually, equating to 114,878 gpd. The demand calculation considered water conservation ordinances for a savings of 36 acre feet (AF) per year and 2 AF per year for voluntary conservation measures.[238] As stated in the WSA, the additional water demand of 129 AF per year has been accounted for in the City's overall total demand projections in LADWP's 2020 Urban Water Management Plan using a service area-wide approach that does not rely on individual development demand. Furthermore, as stated in the WSA, the Project is consistent with the demographic forecasts for the City from the 2020 SCAG RTP/SCS. Therefore, LADWP has determined that the Project water demand is included in the LADWP 2020 UWMP which forecasts adequate water supplies to meet all projected water demands in the City through the year 2045. As such, it is anticipated that sufficient water supplies will be available to serve the Project, and no new or expanded water entitlements will be needed. Impacts would be less than significant, and no mitigation measures are required.

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[236] Metropolitan Water District of Southern California, 2020 Regional Urban Water Management Plan, June 2021, www.mwdh2o.com/planning-for-tomorrow/how-we-plan/, accessed December 23, 2021.

[237] LADWP, Water Supply Assessment—8th and Alameda Project, December 2021.

[238] LADWP, Water Supply Assessment—8th and Alameda Project, p. 7, December 2021.

Table 21
Estimated Project Water Consumption

Land Use	No. of Units/ Floor Area	Water Consumption Rate (gpd/unit)[b]	Total Water Consumption (gpd)
Existing			
Printing Plant	558,918 sf		
Vehicular Maintenance	23,005 sf		
Guard House	150 sf		
Storage	1,476 sf		
Total Exist in[ga]	**583,549 sf**		**52,524**
Proposed			
Building 1			
Stage Space	156,100 sf	0.05	7,805
Stage Support Space	15,600 sf	0.05	780
Office Space	270,530 sf	0.12	32,464
Post-Production Space	17,000 sf	0.05	850
Mill/Shops Space	59,670 sf	0.05	2,984
Fitness Center	15,500 sf	0.65	10,075
Commissary	16,500 sf	0.025	413
Mezzanine Level Café	114 seats	30.00	3,420
Outdoor Dining	387 seats	30.00	11,610
Outdoor Dining	407 seats	30.00	12,210
Building 2			
Storage Space	24,000 sf	0.03	720
Building 3			
Stage Space	38,800 sf	0.05	1,940
Stage Support Space	1,500 sf	0.05	75
Office Space	29,600 sf	0.12	3,552
Building 4			
Stage Space	38,800 sf	0.05	1,940
Stage Support Space	1,500 sf	0.05	75
Office Space	28,100 sf	0.12	3,372
Building 5			
Stage Space	38,800 sf	0.05	1,940
Stage Support Space	1,500 sf	0.05	75
Office Space	29,600 sf	0.12	3,552
Building 6			
Mill/Shops Space	20,700 sf	0.05	1,035
Office Space	20,700 sf	0.12	2,484
Base Camp Area	29,950 sf	0.03	899
Pool	9,000 sf		859
Base Demand Adjustment[d]			245

Table 21 (Continued)
Estimated Project Water Consumption

Land Use	No. of Units/ Floor Area	Water Consumption Rate (gpd/unit)[b]	Total Water Consumption (gpd)
Required Ordinances Water Savings for buildings, base camp area and pool[c]			(10,834)
Landscaping[e]	73,994 sf		7,023
Required Ordinances Water Savings for Landscaping[c]			(3,863)
Covered Parking[f]	517,328 sf	0.02	340
Cooling Tower (CT-3)	500 tons	35.64	17,820
Cooling Towers (CT-1 and CT-2)	2,000 tons	35.64	71,280
Required Ordinances Water Savings for Cooling Towers			(17,556)
Total Proposed			**169,584**
Less Existing to be Removed			**(52,524)**
Voluntary Conservation Measures			**(2,182)**
Net Water Consumption (Proposed – Existing – Voluntary Conservation Measures)			**114,878**

sf = square feet

gpd = gallons per day

[a] *The existing water demand is based on the 5-year billing data from July 2016 to July 2021.*

[b] *Based on sewage generation rates provided by the City of Los Angeles Bureau of Sanitation (2012).*

[c] *The proposed development land uses will conform to City of Los Angeles Ordinance No. 186488, 184248, 2020 Los Angeles Plumbing Code, and 2020 Los Angeles Green Building Code.*

[d] *Base Demand Adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of Bureau of Sanitation Sewer Generation Rates.*

[e] *Landscaping water use is estimated per California Code of Regulations Title 23. Division 2. Chapter 2.7. Model Water Efficient Landscape Ordinance.*

[f] *Auto parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, and 12 times/year cleaning assumption.*

Source: LADWP, Water Supply Assessment—8th and Alameda Project, December 2021.

c. Would the project 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?

Less Than Significant Impact. The Hyperion Water Reclamation Plant, which provides water treatment for the Project Site, has a current remaining capacity of 175 mgd.[239] The Project's net increase in average

[239] LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=6jxqihq40_254&_afrLoop=5327340718723642#!, accessed December 14, 2021.

daily wastewater flows of approximately 103,995 gallons per day, as estimated in the Water and Wastewater Infrastructure Study included in Appendix IS-13, would represent approximately 0.059 percent of the available capacity of the Hyperion Water Reclamation Plant. Therefore, based on the amount of wastewater expected to be generated by the Project, and future wastewater treatment capacity of the Hyperion Water Reclamation Plant, adequate wastewater treatment capacity would be available to serve the Project Site together with projected future demand and existing commitments. As such, impacts on the wastewater treatment provider would be less than significant, and no mitigation measures are required.

d. Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. While the LASAN generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential, commercial and institutional developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within Los Angeles County are categorized as either Class III (e.g., landfills permitted to accept non-hazardous and non-designated solid waste) or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert waste landfills.[240] Ten Class III landfills and one inert landfill are currently operating within the County.[241] In addition, there is one solid waste transformation facility within Los Angeles County (Southeast Resource Recovery Facility) that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.[242]

Based on the 2019 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the estimated remaining capacity for the County's Class III landfills open to the City of Los Angeles is approximately 133.07 million tons as of December 31, 2019.[243] In addition, the 2019 CoIWMP Annual Report estimates that the estimated remaining capacity for the Azusa Land Reclamation landfill, the permitted inert waste landfill serving the County, is 58.84 million tons, as of December 31, 2019.[244] Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the CoIWMP Annual Reports. Within each annual report, future landfill disposal

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240 Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples include sand and concrete.

241 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020. The ten Class III landfills serving the County include the Antelope Valley Landfill, Burbank Landfill, Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, San Clemente Landfill, Whittier (Savage Canyon) Landfill, Scholl Canyon Landfill, and Sunshine Canyon City/County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

242 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

243 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020, Appendix E-2 Table 4. This total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Scholl Canyon, Whittier, Burbank, Pebbly Beach, and San Clemente). In addition, this total excludes the Calabasas Landfill, as its wasteshed does not include the Project Site.

244 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020, Appendix E-2 Table 4.

needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.[245]

The following analysis quantifies the Project's construction and operational solid waste generation.

Construction

As previously discussed, the Project includes the renovation of the existing Plant and vehicular maintenance building into studio production and associated support uses. The Project also includes the demolition of other existing buildings and surface parking to make room for the construction of new sound stage/support buildings, a shops/support building, a parking structure, and guard booths. Materials that could be recycled or salvaged include asphalt, glass, and concrete.

Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of its non-hazardous demolition and construction debris. In addition, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. As discussed above, non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert waste landfills. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent.

After accounting for mandatory recycling, as shown in Table 22 on page 214, the Project would generate a total of approximately 27,600 tons of demolition debris and 5,098 tons of renovation/construction debris, for a combined total of 32,698 tons of construction-related waste generation. Applying the 75 percent diversion rate, the Project would dispose of approximately 8,175 tons of construction-related waste in Azusa Land Reclamation Landfill throughout the construction period. This amount of construction and debris waste would represent approximately 0.014 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity of 58.84 million tons.[246] It should be noted that soil export is not included in the calculation of construction waste since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. As reported above, the Azusa Land Reclamation landfill, the County's inert waste landfill, would be able to accommodate waste from the Project's construction activities.

Based on the above, Project construction would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, the Project's potential construction impacts to solid waste facilities would be less than significant, and no mitigation measures would be required.

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[245] County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

[246] 8,175 tons ÷ 58.84 million tons = 0.014 percent.

Table 22
Project Demolition and Renovation/Construction Waste Generation and Disposal

Land Use	Size	Generation Rate (lbs/sf)[a]	Total (tons)
Demolition Waste			
Parking Areas, Ancillary Buildings, Concrete	—	—	27,600[b]
Total Demolition Waste			*27,600*
Renovation/Construction Waste			
Renovation—Buildings 1 and 2	582,400 sf	11.79	3,433
New Construction—Buildings 3, 4, 5, 6; Guard Booths 7A, 7B, 7C	249,790 sf	4.34	542
New Construction—Building 8 (Parking Structure)	517,328 sf	4.34	1,123
Total Renovation/Construction Waste			*5,098*
Total Demolition and Renovation/Construction Waste (prior to diversion)			**32,698**
Total Disposal (After 75% Diversion)			**8,175**

lbs = pound

sf = square feet

[a] *U.S. Environmental Protection Agency, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, Report No. EPA530-R-09-002, March 2009, Tables 2-2, 2-4, and 2-6.*

[b] *Based on demolition estimates from CalEEMod in Appendix IS-1 of this IS/MND; and the conversion rate of 2,400 pounds per cubic yard for "Construction Debris, Asphalt or Concrete" as provided by CalRecycle, Calculations, Solid Waste Cleanup Project Weights and Volumes for Project Estimates, www.calrecycle.ca.gov/swfacilities/cdi/tools/calculations, accessed July 15, 2021.*

Source: Eyestone Environmental, 2021.

Operation

As discussed above in Checklist Question No. XIV, Population and Housing, the Project would generate an estimated 2,094 employees. Based on solid waste generation factors from LASAN, the Project would generate approximately 1,927 tons of solid waste per year.[247] The estimated amount of solid waste is conservative because the waste generation factors do not account for recycling or other waste diversion measures. For example, the estimate does not take into account AB 939, which requires California cities, counties, and approved regional solid waste management agencies responsible for enacting plans and implementing programs to divert 50 percent of their solid waste away from landfills. The estimate also does not take into account compliance with AB 341, which requires California commercial enterprises and public entities that generate four or more cubic yards per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's recycLA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.

[247] The solid waste generation factor for the "Services—Motion Picture" industry group from LASAN City Waste Characterization and Quantification Study, Table 4, July 2002, was applied to the Project's estimate 2,094 employees. 2,094 employees × 0.92 tons/employee/year = 1,927 tons per year.

The Project's estimated solid waste disposal of 1,927 tons per year represents approximately 0.001 percent of the remaining capacity (133.07 million tons) at the County's Class III landfills that are open to the City of Los Angeles.[248] The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of those landfills. As such, Project operation would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, the Project's potential construction impacts to solid waste facilities would be less than significant, and no mitigation measures would be required.

Furthermore, as described in the 2019 Annual Report, the County will continue to address landfill capacity through the preparation of CoIWMP annual reports. The preparation of each annual report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Solid waste disposal is an essential public service that must be provided without interruption in order to protect public health and safety, as well as the environment. Jurisdictions in the County of Los Angeles continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2019 Annual Report. As discussed below, the Project would be consistent with and would further City policies that call for substantially reducing landfill waste streams. Such policies and programs serve to implement the strategies outlined in the 2019 Annual Report to adequately meet countywide disposal needs through 2034 without capacity shortages.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste generated by construction and operation of the Project. Therefore, the Project's potential impacts related to solid waste generation would be less than significant, and mitigation measures are required.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the state is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939) which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Further, AB 341 (AB 341), which became effective on July 1, 2012, requires businesses and public facilities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California.

[248] 1,927 tons per year ÷ 133.07 million tons = 0.001 percent.

Additionally, in March 2006, the City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The "blueprint" of the plan builds on the key elements of existing reduction and recycling programs and infrastructure, and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. Furthermore, the LASAN Solid Waste Integrated Resources Plan (SWIRP), also known as the City's Zero Waste Plan, is a 20-year master plan to reduce solid waste, increase recycling, and manage trash in the City through the year 2030. The SWIRP is the result of a Mayoral directive that is aligned with the City Council's RENEW LA plan, both discussed above.[249] This plan encompasses on-going programs and solutions (e.g., blue and green bin recycling, multi-family recycling, restaurant food scrap diversion, alternative technologies, hazardous waste recycling, LAUSD recycling program, etc.) as well as new programs to be implemented during the planning horizon. In addition, L.A.'s Green New Deal provides the following targets related to solid waste in the City: increase landfill diversion rate to 90 percent by 2025, 95 percent by 2035, and 100 percent by 2050; reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028; eliminate organic waste going to landfill by 2028.[250]

In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week.[251] Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.[252] The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. In addition, as discussed above, pursuant to LAMC Sections 66.32 through 66.32.5 (the City's Construction and Demolition Waste Recycling Ordinance No. 181,519), the Project's general contractor and/or subcontractors would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. Since the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste, the Project's potential impacts would be less than significant, and no mitigation measures are required.

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249 City of Los Angeles, Bureau of Sanitation, Solid Waste Integrated Resources Plan (SWIRP), www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_adf.ctrl-state=2480tj731_4&_afrLoop=676816927802076#!, accessed August 16, 2021.

250 City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn, 2019.

251 Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

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

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

b. Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project Site is located in an urbanized area in the northern part of downtown Los Angeles. There are no wildlands located in or in the vicinity of the Project Site. The Project Site is not

located within a City-designated Very High Fire Hazard Severity Zone,[253] nor is it located within a City-designated fire buffer zone.[254] Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. The Project would not create impacts with regard to wildfire risks, and no mitigation measures are required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially 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, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a. Does the project have the potential to substantially 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, substantially 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?

Less Than Significant Impact. As discussed above, the Project Site is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. In addition, no sensitive plant or animal community or special status species occur on the Project Site. Since there is the potential that migratory

[253] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166-023-010, 5166-023-016, 5166-027-014, and 5166-028-004, http://zimas.lacity.org/, accessed March 11, 2021. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

[254] City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

birds could nest in the trees that would be removed under the Project, the Project shall incorporate mitigation that is identified under Checklist Question No. IV, which will ensure that potential impacts associated with migratory birds would be less than significant. In addition, the Project shall incorporate mitigation that is identified under Checklist Question No. V with regard to unanticipated archaeological resources to ensure that potential impacts associated with archaeological resources would be less than significant. Therefore, for the reasons set forth above in this MND, the Project would not have the potential to substantially 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, substantially 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. With the incorporation of the mitigation measures identified above into the Project, all such potential Project impacts would be less than significant.

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)?

Less Than Significant Impact. CEQA requires that the analysis of potential project impacts include cumulative impacts. CEQA defines cumulative impacts as "two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts."[255] This analysis of cumulative impacts need not be as in-depth as the analysis of the Project's impacts, but instead is to "be guided by the standards of practicality and reasonableness."[256]

As listed in Table 23 on page 220, the City identified 55 related projects within an approximately 2.5-mile radius of the Project Site. A map showing the locations of the related projects relative to the Project Site is included as Figure 9 of the Traffic Assessment included in Appendix IS-11.1 of this IS/MND. As shown therein, the nearest related projects are Related Project No. 49, a mixed-use project located at 1000 S. Mateo St. approximately 0.3 mile northeast of the Project Site, and Related Project 52, a mixed-use project located at 1200 S. Santa Fe Avenue approximately 0.3 mile east of the Project Site. As the following analysis shows, due to the distance of most of the related projects from the Project Site and the physical conditions in the vicinity of the Project Site, and with the incorporation of the mitigation measures previously identified in this IS/MND, the Project would not have impacts that are individually limited but cumulatively considerable. Therefore, cumulative impacts would be less than significant.

Aesthetics—As indicated in the related projects map (Figure 9 of the Transportation Assessment included as Appendix IS-11.1 of this IS/MND), none of the related projects is located in the immediate vicinity of the Project Site, nor does any related project share a direct line-of-site with the Project. The Western Electric Company Historic District is comprised of two buildings located to the west of the Project Site, across Alameda Street. However, as detailed in the HRTR, the primary public views of the Historic District are from Alameda Street, and these views would remain unchanged by the Project. There are no important views of or from the Historic District from any direction that would be blocked by the Project. Hence, the aesthetics impacts of the Project would not have the potential to combine with the aesthetics

[255] State CEQA Guidelines, 14 California Code of Regulations, § 15355, et seq.

[256] Ibid.

Table 23
Related Projects List

No.	Project	Distance from Project Site	Description
1.	Office & Commercial 2159 E. Bay St.	0.6 mile	202,954 sf creative office 3,235 sf meeting room space 10,860 sf quality restaurant 10,860 sf high-turnover restaurant
2.	Rendon Hotel 2053 E. 7th St.	0.6 mile	103-room hotel
3.	676 Mateo Street Mixed-Use Project 676 S. Mateo St.	0.6 mile	159 apartment units 26,093 sf office 15,005 sf restaurant 8,375 sf retail
4.	Mixed-Use 2143 E. Violet St.	0.6 mile	347 apartment units 21,858 sf restaurant 187,374 sf office
5.	ROW DTLA Mixed-Use 777 S. Alameda St.	0.4 mile	850,400 sf office 117,700 sf restaurant 66,200 sf retail 125 hotel rooms
6.	Mixed-Use 930 E. 6th St.	0.7 mile	236 apartment units 12,000 sf retail
7.	6AM (6th & Alameda Mixed-Use) 1206 E. 6th St.	0.6 mile	1,736 apartment units 316,632 sf warehouse 253,514 sf office 45,278 sf restaurant 82,332 sf retail 22,429 sf art museum 514 hotel rooms 300-student school
8.	Municipal Solid Waste Facility 2001 E. Washington Blvd.	0.6 mile	187,000 sf municipal solid waste material recovery facility
9.	Mixed-Use 640 S. Santa Fe Ave.	0.7 mile	91,185 sf office 9,430 sf retail 6,550 sf restaurant
10.	Mixed-Use 641 S. Imperial St.	0.7 mile	140 live-work units 14,750 sf commercial
11.	Restaurant 1722 E. 16th St.	0.5 mile	8,151 sf restaurant
12.	Mixed-Use (Revised) 1800 E. 7th St.	0.4 mile	122 apartment units 3,245 sf retail 4,605 sf restaurant 2,700 sf office
13.	2110 Bay Street 2110 Bay St.	0.5 mile	110 live-work units 113,350 sf office 43,657 sf retail
14.	Mixed-Use 668 S. Alameda St.	0.5 mile	475 live-work units 33,100 sf office 17,500 sf retail 16,300 sf restaurant 15,300 sf supermarket

Table 23 (Continued)
Related Projects List

No.	Project	Distance from Project Site	Description
15.	1024 Mateo St Mixed-Use 1024 S. Mateo St.	0.4 mile	106 apartment units 2,250 sf live-work office 92,740 sf office 13,979 sf retail 13,126 sf restaurant
16.	Mesquit Mixed-Use 670 S. Mesquit St.	0.7 mile	944,055 sf office 308 apartment units 236 hotel rooms 79,240 sf retail 89,576 sf restaurant 62,148 sf gym 93,617 sf studio/museum/gallery 56,912 sf grocery store
17.	Camden Arts Mixed-Use 1525 E. Industrial St.	0.5 mile	328 apartment units 27,300 sf office 6,400 sf retail 5,700 sf restaurant
18.	Mixed-Use 2130 E. Violet St.	0.6 mile	94,000 sf office 3,500 sf retail 4,000 sf restaurant
19.	Mixed-Use 1000 S. Santa Fe St.	0.5 mile	14,193 sf market 6,793 sf health club 10,065 sf restaurant
20.	Hillcrest Mixed-Use 1745 E. 7th St.	0.5 mile	57 apartment units 6,000 sf retail
21.	Mixed-Use (Old Ford Factory) 2030 E. 7th St.	0.5 mile	243,583 sf office 40,000 sf retail
22.	Mixed-Use 2051 E. 7th St.	0.6 mile	320 apartment units 5,000 sf restaurant 15,000 sf retail
23.	Mixed-Use 826 S. Mateo St.	0.4 mile	90 live-work units 11,000 sf retail 5,600 sf restaurant
24.	SPR-Industrial Park 1005 S. Mateo St.	0.4 mile	94,849 sf industrial park
25.	The City Market (Mixed-Use) 1057 S. San Pedro St.	0.9 mile	945 residential units 210-room hotel 294,641 sf office 224,862 sf retail 744-seat cinema
26.	Office 540 S. Santa Fe Ave.	0.9 mile	89,825 sf office
27.	310 Residential Apartments + 26,700 sf Commercial 1147 E. Palmetto St.	0.8 mile	310 residential apartment units 26,701 sf commercial
28.	Mixed-Use (Coca Cola) 963 E. 4th St.	1.0 mile	75,000 sf office 25,000 sf retail 20,000 sf restaurant

Table 23 (Continued)
Related Projects List

No.	Project	Distance from Project Site	Description
29.	Retail (Palmetto & Mateo) 555 S. Mateo St.	0.8 mile	1,530,000 sf retail
30.	Mixed-Use 360 S. Alameda St.	1.0 mile	52 apartment units 2,400 sf restaurant 6,900 sf creative office
31.	Arts District Center (Mixed-Use) 1129 E. 5th St.	0.9 mile	27,000 sf retail 32,000 sf restaurant 113-room hotel 129 apartment units 10,341 sf art gallery 3,430 design incubator
32.	Restaurant 500 S. Mateo St.	0.9 mile	12,682 sf high-turnover restaurant
33.	Mixed-Use 719 E. 5th St.	1.0 mile	160 apartment units 7,500 sf retail
34.	520 Mateo St Mixed-Use 520 S. Mateo St.	0.9 mile	600 apartment units 120,000 sf office 15,000 sf retail 15,000 sf restaurant
35.	4th & Hewitt Mixed-Use 405 S. Hewitt St.	1.0 mile	311,682 sf office 81,49 sf retail
36.	Apartments 656 S. Stanford Ave.	0.8 mile	82 apartment units
37.	Weingart Projects (Affordable Housing) 554 S. San Pedro St.	1.0 mile	667 affordable housing units 54,500 commercial on two sites
38.	San Pedro Tower (Affordable Housing) 600 S. San Pedro St.	1.0 mile	5 apartment units 298 affordable housing units 19,909 sf commercial
39.	Sears Mixed-Use Project 2650 E. Olympic Blvd.	1.0 mile	1,000 apartment units 34,000 sf retail 46,000 sf high-turnover restaurant 230,000 sf office
40.	Palmetto Mixed-Use 527 S. Colyton St.	0.8 mile	275 apartment units 35 affordable housing units 11,375 sf retail 11,375 sf artist production
41.	Mixed-Use 609 E. 5th St.	1.0 mile	151 apartment units
42.[a]	Residential (Edward Hotel) 713 E. 5th St.	1.0 mile	50 affordable housing units 1 apartment unit
43.	Office, Restaurant, Fast-Food 431 S. Colyton St.	0.9 mile	97,577 sf office 10,739 sf restaurant 1,977 sf fast-food restaurant

Table 23 (Continued)
Related Projects List

No.	Project	Distance from Project Site	Description
44.	1100 E 5th St Mixed-Use Project 1100 E. 5th St.	0.9 mile	220 apartment units 4,350 sf office 17,810 sf general office 19,609 sf restaurant 9,129 sf retail
45.[a]	Affordable Housing Development 508 E. 4th St.	1.0 mile	41 affordable housing units
46.	Clinic 649 S. Wall St.	1.0 mile	55 apartment units 25,000 sf clinic
47.	400 S Alameda Hotel 400 S. Alameda St.	1.0 mile	66-room hotel 2,130 sf restaurant 840 sf retail
48.	Greystar GP II 330 Alameda St.	1.0 mile	186 apartment units 22,000 sf commercial
49.	Mixed-Use 1000 S. Mateo St.	0.3 mile	113 apartment units 134,000 sf commercial
50.[b]	Restaurant 605 E. 4th St.	1.0 mile	3,798 sf restaurant
51.[b]	Mixed-Use 1340 E. 6th St.	0.7 mile	193 live/work units 255,088 sf commercial
52.	Mixed-Use 1200 S. Santa Fe Ave.	0.3 mile	53 apartment units 13,000 sf retail
53.	Apartments 655 San Pedro St.	0.9 mile	81 apartment units
54.[b]	Restaurant 634 S. Mateo St.	0.6 mile	499-seat restaurant
55.[b]	Affordable Housing Development 401 E. 7th St.	1.0 mile	99 affordable housing units

[a] *Although construction of the related project may be partially complete/entirely complete, the project was not fully occupied at the time of the NOP or when traffic counts were conducted. Therefore, the related project was considered and listed to provide a more conservative analysis.*

[b] *Trip generation estimated using rates from Trip Generation, 10th Edition, Institute of Transportation Engineers, 2017.*

Source: Gibson Transportation Consulting, Inc., 2021.

impacts of the related projects to result in cumulative aesthetics impacts. Moreover, like the Project, the related projects would be reviewed on a case-by-case basis by the City to comply with LAMC requirements regarding, building heights, setbacks, massing and lighting or, for those projects that require discretionary actions, to undergo site-specific review regarding building density, design, and light and glare effects. Lastly, the Project would result in less-than-significant aesthetics impacts and thus would not contribute considerably to cumulative aesthetics impacts. For all these reasons, cumulative aesthetics impacts would be less than significant.

Agriculture and Forestry Resources—As indicated in Checklist Question No. II, Agricultural and Forestry Resources, of this IS/MND, the Project Site is developed with printing production uses and no agricultural or forest uses exist within the Project Site or its vicinity. Therefore, the Project would not convert agricultural or forestry resources to other uses. In addition, the Project Site and adjacent properties are not designated or zoned for agricultural or forestry use, nor are the Project Site and adjacent parcels subject to Williamson Act contracts. Furthermore, none of the related projects proposes converting agricultural or forestry resources to other uses. Therefore, the Project would not contribute considerably to cumulative agriculture and forestry resources impacts, and cumulative agriculture and forestry resources impacts would be less than significant.

Air Quality—According to SCAQMD, a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts (i.e., if an individual project exceeds the SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase). As indicated in Checklist Question No. III, Air Quality, of this IS/MND, the Project's construction- and operations-related air quality impacts would be less than significant and the Project would be consistent with the AQMD. Therefore, the Project would not contribute considerably to cumulative air quality impacts, and cumulative air quality impacts would be less than significant.

Biological Resources—As provided in response to Checklist Question No. IV, Biological Resources, of this IS/MND, the Project Site is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. In addition, no sensitive plant or animal community or special status species occur on the Project Site and no special-status wildlife or fish species are considered to have a moderate or high potential for occurrence in the Project Site area, the Project would not remove protected trees, , and the Project would not conflict with the provisions of an HCP, Natural Community Conservation Plan or other such plan. Also, since there is the potential that migratory birds could nest in the on-site trees that would be removed under the Project, the Project shall incorporate the mitigation identified to ensure that potential impacts would be less than significant. In addition, as with the Project, the related projects would be required to comply with the City's Protected Tree Ordinance, the Migratory Bird Treaty Act, and other applicable biological resources regulations, as well as with CEQA for those projects subject to CEQA review. Furthermore, to the extent that the related projects would result in significant impacts to biological resources, they would be required to implement mitigation to reduce/avoid the impacts. Thus, as the Project would not result in significant impacts to biological resources, the Project would not contribute considerably to cumulative biological resources impacts. As such, cumulative biological resources impacts would be less than significant.

Cultural Resources—Cumulative impacts to historical resources would occur if the Project and related projects affect local resources with the same level or type of designation or evaluation, affect other structures located within the same historic district, or involve resources that are significant within the same context. As provided in Checklist Question No. V, Cultural Resources, of this IS/MND, the SCCIC records search conducted for the Project indicates that no known historic resources or HCMs are located within the Project Site. In addition, none of the Project Site buildings has been identified as potential historic resources on SurveyLA, the Citywide historic resources survey performed by the City's Office of Historic Resources. While there are no historical resources on the Project Site, two historic resources are immediately adjacent to the Project Site, including the Overland Terminal Produce Warehouse located at 872 S. Alameda Street southwest of the Project Site and the Western Electric Company Historic District comprised of two buildings located at 800-822 McGarry Street and 1753 E. Olympic Boulevard. As

detailed in Checklist Question No. V, the significance of the Overland Terminal Produce Warehouse, which is adjacent to the Project Site, would not be impaired by the Project. In addition, the primary public views of the Historic District are from Alameda Street, and these views would remain unchanged by the Project. There are no important views of or from the Historic District from any direction that would be blocked by the Project, and the Project would not further modify or compromise its historic setting as its setting is already compromised. Therefore, while one or more of the related projects could potentially affect historical resources, the Project would not contribute considerably to any such impacts. As such, cumulative historical resources impacts would be less than significant.

With regard to archaeological resources and human remains, the Project Site is located within an urbanized area that has been disturbed and developed over time. As discussed in the Archaeological Resources Report, SCCIC records indicate that of the 78 previously recorded cultural resources within 0.5-mile of the Project Site, none of these resources intersects or overlaps the Project Site. The SCCIC records search also indicated one previous cultural resources technical study, LA-13239, intersected the western portion of the Project Site. Report LA-13239 was completed by Cogstone Environmental and attempted to identify the extent of the zanja network. Based on the GPR results, however, there is no indication of the presence of intact zanja segments. Given the substantial nature of development by existing utilities, the EJ Stanton Lumber Yard, Union Pacific Railway, and other historic and current development indicated above, the potential for a nineteenth century zanja feature to persist is considered exceedingly low. Therefore, based on the review of historical information, maps, and the GPR investigation results, and in consideration of the severity of past impacts to subsurface soils, Dudek concluded that there is little potential that any extant zanja segments or other intact archaeological resources are present that could be impacted as a result of Project implementation. While unlikely, unanticipated archaeological deposits or features, including remnants of zanja segments or those associated with previous historical uses such as the EJ Stanton Lumber Yard and Union Pacific Railway, cannot be ruled out as potentially being present at subsurface levels within the Project Site. As such, the Project shall incorporate the mitigation identified in Checklist Question No. V, Cultural Resources, of this IS/MND, which will ensure that the Project's potential impacts associated with unanticipated archaeological resources would be less than significant. Any related project would similarly be subject to any mitigation measures.

While disturbance of human remains is not expected in conjunction with Project grading and excavation activities, in accordance with Section 7050.5 of the California Health and Safety Code, if human remains are discovered during construction of the Project, the County Coroner will be immediately notified of the discovery. No further excavation or disturbance of the Project Site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working days of notification of the discovery, if the remains are human. The Project development would proceed in accordance with California Public Resources Code, Section 5097.98. With the implementation of these regulatory requirements, the Project's impacts to human remains would be less than significant. Any related project would similarly be subject to such regulatory requirements.

Therefore, the Project would not contribute considerably to cumulative impacts on archaeological resources and human remains, and cumulative impacts to such resources would be less than significant.

Energy—As analyzed under Checklist Question No. VI, Energy, of this IS/MND, the Project would result in a less-than-significant impact on energy resources and would adhere to all applicable energy conservation requirements (e.g., City's Green Building Ordinance, Title 24 energy efficiency standards,

etc.), and would implement sustainability features which include, but are not limited to: high efficiency dual-flush toilets with a flush volume of 1.28/1.1 gallons per flush, or less, high efficiency hybrid urinals, showerheads with a flow rate of 1.5 gallons per minute or less and drip irrigation systems to promote reductions in indoor and outdoor water usage; Energy Star–labeled appliances; and water-efficient landscape design. In addition, the Project would provide domestic water heating systems located in close proximity to point(s) of use and individual metering and billing for water use. As with the Project, the related projects would also be expected to implement energy conservation features to minimize the inefficient use of energy in accordance with applicable regulations, including the City's Green Building Ordinance and Title 24 energy efficiency standards. Therefore, the Project and the related projects would not result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. As such, the Project would not contribute considerably to cumulative energy impacts, cumulative energy impacts would be less than significant.

Geology and Soils—Due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. As analyzed under Checklist Question No. VII, Geology and Soils, of this IS/MND, the Project's impacts would be less than significant. As with the Project, the related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. Cumulative development would expose a greater number of people to seismic hazards. However, as with the Project, the related projects would be subject to local, state, and federal regulations and standards for seismic safety. As the Project Site has previously been graded and developed, surficial paleontological resources that may have existed at one time have likely previously been disturbed. Based on a Project Site-specific paleontological records search conducted through the Natural History Museum of Los Angeles County, there are no previously encountered fossil localities located within the Project Site. However, the possibility exists that paleontological artifacts that were not discovered during prior construction or other human activity may be present within the Project Site. As such, the Project would comply with the City's standard condition of approval to address inadvertent discovery of paleontological resources and would not directly or indirectly destroy a unique paleontological resource. As part of the environmental review processes for the related projects, it is expected that mitigation measures or City conditions of approval would be required to address the potential for uncovering of paleontological resources. Therefore, the Project would not contribute considerably to cumulative geology and soils impacts, and cumulative geology and soils impacts would be less than significant.

Greenhouse Gas Emissions—As discussed above under Checklist Question No. VIII, Greenhouse Gas Emissions, of this IS/MND, the analysis of a project's GHG emissions is inherently a cumulative impacts analysis because climate change is a global problem and the emissions from any single project alone would be negligible. Accordingly, the Project-level analysis under Checklist Question No. VIII, Greenhouse Gas Emissions, of this IS/MND assessed the potential for the Project to contribute to the cumulative impact of global climate change. As analyzed above, the Project's impacts regarding GHG emissions would be less than significant. As such, the Project would not contribute considerably to cumulative GHG impacts, and cumulative GHG impacts would be less than significant.

Hazards and Hazardous Materials—As with the Project, all related development located within the vicinity of the Project Site would be subject to local, regional, state, and federal regulations pertaining to hazards and hazardous materials. Furthermore, the nearest related projects are located 0.3 mile from the Project Site and therefore it is not anticipated that any hazards and hazardous materials impacts

associated with the related projects would combine with such impacts of the proposed project to result in cumulative hazards and hazardous materials impacts. Lastly, as discussed in Checklist Question No. IX, Hazards and Hazardous Materials, of this IS/MND, with the incorporation of Mitigation Measures HAZ-MM-1 and HAZ-MM-2, the Project's potential impacts related to hazards and hazardous materials would be less than significant. Hence, the Project would not contribute considerably to cumulative hazards and hazardous materials impacts, and cumulative hazards and hazardous materials impacts would be less than significant.

Hydrology and Water Quality—The related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, the related projects would be subject to NPDES permit requirements for both construction and operation, including development of SWPPPs for construction projects greater than 1 acre and compliance with local requirements pertaining to hydrology and surface water quality. It is anticipated that the related projects would be evaluated on an individual basis by the City during both site plan review and CEQA review (if applicable) to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Lastly, as indicated in Checklist Question No. X, Hydrology and Water Quality, of this IS/MND, the Project would result in less than significant hydrology and water quality impacts due to the installation of drywells and reduction in peak hour stormwater runoff, and regulatory compliance. As also indicated in Checklist Question No. X, the Project is not proposed in a floodplain, would not impede/redirect flood flows, and would not be subject to inundation by 100-year flood flows, seiches or tsunamis. Therefore, the Project would not contribute considerably to cumulative hydrology and water quality impacts, and cumulative hydrology and water quality impacts would be less than significant.

Land Use and Planning—As discussed in Checklist Question No. XI, Land Use and Planning, of this IS/MND, the Project would be substantially consistent with applicable land use plans, policies and regulations (e.g., the General Plan Framework Element, Central City North Community Plan, LAMC, River Implementation Overlay District, and SCAG's 2020–2045 RTP/SCS), and would result in less than significant land use and planning impacts. Specifically, the Project would not physically divide an established community, and would not cause a significant environmental impact due to a conflict with a land use plan, policy or regulation adopted for the propose of avoiding or mitigating an environmental effect. As with the Project, the related projects would be reviewed on a case-by-case basis to ensure consistency with existing land use policies and regulations. Where inconsistencies occur for the related projects, it is anticipated that appropriate actions would be undertaken to ensure that land use impacts would be less than significant. Thus, cumulative land use impacts would be less than significant.

Mineral Resources—As discussed in Checklist Question No. XII, Mineral Resources, of this IS/MND, the Project Site is not located within a City-designated Mineral Resource Zone or a mineral producing area as classified by the California Geological Survey such that the Project would not result in the loss of a locally-important mineral resource recovery site. Furthermore, no mineral resources or extraction operations for such resources occur in the Project Site vicinity. Therefore, the Project would not contribute considerably to cumulative mineral resources impacts, and cumulative mineral resources impacts would be less than significant.

Noise—As detailed in Checklist Question No. XIII, Noise, of this IS/MND, potential noise impacts associated with the Project construction and operation would be less than significant. The Project's potential vibration impacts with respect to human annoyance and potential building damage associated

with construction activities and operation would also be less than significant. In addition, Project's potential groundborne noise impacts would be less than significant during construction and operation. Also, the closest related projects are located approximately 0.3 mile from the Project Site such that Project construction and operations-related stationary source and activity-related noise would not combine with noise from the related projects to result in cumulative noise. Lastly, like the Project, the related projects would be required to mitigate their noise impacts. Therefore, the Project would not contribute considerably to cumulative noise impacts, and cumulative noise impacts would be less than significant.

Population and Housing—As discussed in Checklist Question No. XIV, Population and Housing, of this IS/MND, the Project would not construct or displace residential units such that there would be no direct impacts to population and housing. While the Project would increase on-site employment, these increases would not be expected to cause a substantial number of new households to move to the Central City North Community Plan area or to generate a demand for substantial new housing. Further, the Project Site is already developed with urban uses, and the Project would not extend infrastructure to currently unserved areas and would not induce substantial population growth. Thus, as concluded in Checklist Question No. XIV, Project population and housing impacts would be less than significant. In addition, while the related projects could cumulatively increase population in the area, such increases would be expected to be within City and SCAG growth forecasts. The Project would contribute little if any to additional population growth in the area. Thus, the Project would not contribute considerably to cumulative population and housing impacts, and cumulative population and housing impacts would be less than significant.

Public Services—As discussed in Checklist Question No. XV, Public Services, of this IS/MND, the Project would meet City fire flow and emergency access requirements and City Building Code requirements related to fire protection. The Project would implement a Construction Management Plan pursuant to Project Design Feature TR-PDF-1) to ensure adequate emergency access during construction. In addition, the Project would not result in a substantial increase in demand for LAFD facilities and services, and would not result in substantial traffic congestion which could slow emergency response. Therefore, Project impacts to fire protection would be less than significant. Like the Project, the related projects would be required to comply with applicable City fire protection requirements, fire/life safety plan review, and in some instances implement a Construction Management Plan. Furthermore, consistent with the decision in *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), it is the City's obligation to provide adequate fire protection and emergency medical services. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. Therefore, the Project would not contribute considerably to cumulative fire protection impacts, and cumulative fire protection impacts would be less than significant.

Regarding police protection, as discussed in Checklist Question No. XV the Project would not introduce a direct residential population typically associated with an increased demand for such services. In addition, the Project's new and renovated buildings would include security features (e.g., fenced/gated campus, security lighting, etc.), and the Project includes the construction of new guard booths at the main entrance and the proposed truck entrance, a closed circuit camera system and keycard or guarded entry, and implementation of any additional security features/measures required by the City, and would not result in substantial traffic congestion which could slow emergency response. Furthermore, consistent with the

decision in *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), it is the City's obligation to provide adequate police services. LAPD would continue to monitor population growth and land development in the City and identify additional resource needs including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and allocated according to the priorities at the time. The Project would not contribute considerably to any cumulative police protection impacts, and cumulative police protection impacts would be less than significant.

As analyzed previously, the Project would not generate a direct residential population that could increase the demand for schools or libraries. In addition, any indirect increase in the local residential population associated with the Project would be inconsequential. Lastly, like the Project, the related projects would be required to pay SB 50 school impact fees which, pursuant to Government Code Section 65995, is considered full mitigation for the impact of new development on schools. Therefore, the Project would not contribute considerably to any cumulative impacts to schools or libraries, and cumulative schools and libraries impacts would be less than significant.

Parks and Recreation—The Project does not include residential development, which typically creates a direct demand on park services. In addition, any indirect increase in the local residential population associated with the Project would be inconsequential. Furthermore, the Project proposes several on-site amenities for the use of employees, including a health/fitness center, dining areas, outdoor seating, and additional landscaped areas. Thus, as discussed in Checklist Question No. XVI, Recreation, of this IS/MND, the Project would meet its on-site demand for park and recreational facilities, and no substantial new demand for parks and recreational facilities would occur. Moreover, those related projects requiring discretionary approvals would be subject to CEQA review by the City which would address, in part, parks and recreational facilities service demand, and the related projects. Furthermore, the related Projects would be required to comply with the parks and recreation requirements of the Quimby Act and LAMC (e.g., provision of parkland and/or payment of in-lieu fees), as applicable. Thus, the Project would not contribute considerably to cumulative parks and recreation impacts, and cumulative parks and recreation impacts would be less than significant.

Transportation—Similar to the Project, the related projects considered in the transportation assessment would be individually responsible for complying with relevant plans, programs, ordinances, or policies addressing the circulation system. In addition, similar to the Project, the related projects would be required to mitigate any conflicts with VMT reduction requirements, substantial hazards due to geometric design features or incompatible uses, and inadequate emergency access. Furthermore, as discussed in Checklist Question No. XVII, Transportation, and in the Transportation Assessment (Appendix IS-11.1 of this IS/MND), the Project would be consistent with existing applicable plans addressing circulation and would result in less-than-significant impacts associated with VMT, hazards due to design features or incompatible uses, and emergency access. Related projects would undergo screening and analyses in accordance with LADOT TAG and be required to implement TDM features or mitigation measures as needed. Therefore, the Project would not contribute considerably to cumulative transportation impacts, and cumulative transportation impacts would be less than significant.

Tribal Cultural Resources—As discussed in Checklist Question No. XVIII, Tribal Cultural Resources, of this IS/MND, the majority of the related projects are located a substantial distance from the Project Site.

In addition, the Project and several of the related projects are located on sites that are currently developed or have otherwise been disturbed. Furthermore, the TCR Report and SCCIC records search conducted for the Project indicates that impacts related to tribal cultural resources would be less than significant. Notwithstanding, given the past history of Native American occupation in the Los Angeles area and greater southern California region, and in light of the general proximity of the Project site to known villages, roads, and the Los Angeles River, as well as the input from the tribal representatives, it is concluded that Project construction activities could potentially unearth or otherwise disturb buried tribal cultural resources. As such, out of an abundance of caution to provide maximum protection against inadvertent encounters with previously unidentified tribal cultural resource, the Project shall incorporate the mitigation identified in Checklist Question No. XVIII, Tribal Cultural Resources, of this IS/MND, which will ensure that the Project's potential impacts associated with unanticipated tribal cultural resources would be less than significant. Any related projects would similarly be subject to any mitigation measures should it be determined that there may be tribal cultural resource present. Furthermore, like the Project, the related projects would be required to comply with the consultation requirements of AB 52 to determine and mitigate any potential impacts to tribal cultural resources. Therefore, cumulative impacts associated with tribal cultural resources would be less than significant.

Utilities and Service Systems—Due to shared urban infrastructure, the Project and related projects would cumulatively increase water demand, wastewater generation, stormwater discharges, and energy and telecommunication service demand on the local water, sewer, stormwater drainage, and energy infrastructure. However, as discussed in Checklist Question No. XIX, sufficient infrastructure capacity is available to accommodate the Project. In addition, like the Project, related projects would be reviewed by the City to ensure that sufficient capacity exists or additional improvements are made to provide capacity prior to construction.… Therefore, the Project would not contribute considerably to cumulative utilities and service system impacts, and cumulative impacts would be less than significant.

With regard to solid waste, the Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, as discussed in Checklist Question No. XIX, unclassified landfills in the County do not generally have capacity concerns, and inert landfills serving the Project and the related projects would have sufficient capacity to accommodate construction waste disposal needs. With regards to operational solid waste disposal needs, the minimal increase in solid waste generated by the Project would be well within the capacity of existing landfills, as discussed in Checklist Question No. XIX of this IS/MND. In addition, with the implementation of solid waste policies and objectives intended to help achieve the requirements of AB 939 and the City's 90-percent diversion goal, it is expected that the Project and related projects would not substantially reduce the projected timeline for landfills within the region to reach capacity. Furthermore, the County of Los Angeles conducts ongoing evaluations to ensure that landfill capacity is adequate to serve the forecasted disposal needs of the region. Therefore, the Project would not contribute considerably to cumulative solid waste impacts, and cumulative solid waste impacts would be less than significant.

Wildfire—As discussed in Checklist Question No. XX, Wildfire, of this IS/MND, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan or expose people or structures to significant risks, including downslope or downstream flooding or landslides, after a fire, because the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Thus, the Project would not contribute considerably to cumulative wildfire impacts, and cumulative wildfire impacts would be less than significant.

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

Less Than Significant Impact. Based on the analyses presented in this IS/MND, with the incorporation of the mitigation measures identified in this IS/MND, the Project's environmental impacts would be less than significant. Therefore, the Project would not have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly, and the impacts would be less than significant.