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

INITIAL STUDY

Fourth & Central Project

Case Number: ENV-2021-4071-EIR

Project Location: 400 S. Central Avenue (364–464, 425-433 S. Central Avenue; 715 and 730 E. 4th Street); Los Angeles, CA 90013

Community Plan Area: Central City

Council District: 14 – Kevin de León

Project Description: The Fourth & Central Project (Project) would generally be located at 400 S. Central Avenue and consist of three distinct sites (North, South, and West Sites), with a total land area of approximately 7.6 acres [333,602 gross square feet (sf) of lot area pre-dedication]. The Project Site is comprised of the following areas: North Site (1.35 acres) located at the northeast corner of 4th Street and Central Avenue; South Site (5.98 acres) located south of 4th Street between Central Avenue and Alameda Street; and West Site (0.32 acres) located at the northwestern intersection of Gladys Avenue and S. Central Avenue. The Project would demolish the existing surface parking and cold storage facility uses on the West and South Sites, and would adaptively reuse, if feasible, a portion of a six-story cold storage building on the North Site, while demolishing the remaining warehouse uses. The Project would include a mix of residential, office, restaurant/retail, and hotel uses within 10 distinct buildings over the three Sites totaling up to 2,318,534 square feet (sf) of floor area. The Project would include: 1,521 residential units, including affordable housing units, totaling 1,731,849 sf; 411,113 sf of office uses; 101,088 sf of restaurant/retail uses; and 68 hotel rooms, totaling74,484 sf of hotel floor area. The Project would include 90,113 sf of publicly accessible open space, including paseos between Central Avenue and Alameda Street, plazas, and pocket parks, within the North and South Sites. The proposed buildings would range in height from 2 to 44 stories, with a maximum height of approximately 500 feet. Parking would be provided in up to four levels of subterranean parking and in above-grade parking podiums.

PREPARED FOR:	PREPARED BY:	APPLICANT:
The City of Los Angeles Department of City Planning	ESA	CP LA Cold Storage Land, LLC

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1 INTRODUCTION

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

This Initial Study evaluates potential environmental effects resulting from construction, implementation, and operation of the Project. The Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City uses Appendix G of the CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. Based on the analysis provided within this Initial Study, the City has concluded that the Project may result in significant impacts on the environment and the preparation of an Environmental Impact Report (EIR) is required. This Initial Study and the forthcoming EIR are informational documents and are ultimately required to be adopted by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF INITIAL STUDY

CEQA was enacted in 1970 with several basic purposes: (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 or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration nor Mitigated Negative Declaration is appropriate, an EIR is normally required.[1]

[1] State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

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.

1.3 CEQA PROCESS

In compliance with the 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, throughout the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which can be found on the State of California's website (http://resources.ca.gov/ceqa).

Initial Study

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 the Project may have a significant effect(s) on the environment and an EIR will be prepared.

A Notice of Preparation (NOP) is prepared to notify public agencies and the general public that the lead agency is starting the preparation of an EIR for a proposed project. The NOP and Initial Study are circulated for a 30-day review and comment period. During this review period, the lead agency requests comments from agencies and the public on the scope and content of the environmental information to be included in the EIR. After the close of the 30-day review and comment period, the lead agency continues the preparation of the Draft EIR and any associated technical studies, which may be expanded in consideration of the comments received on the NOP.

Draft EIR

Once the Draft EIR is complete, a Notice of Completion and Availability is prepared to inform public agencies and the general public of the availability of the document and the locations where the document can be reviewed. The Draft EIR and Notice of Completion and Availability are

circulated for a 45-day review and comment period. The purpose of this review and comment period is to provide public agencies and the general public an opportunity to review the Draft EIR and comment on the adequacy of the document, including the analysis of environmental effects, the mitigation measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to all comments on environmental issues are prepared.

Final EIR

The lead agency prepares a Final EIR, which incorporates the Draft EIR or a revision to the Draft EIR, comments received on the Draft EIR and list of commenters, and responses to significant environmental points raised in the review and consultation process.

The decision-making body then considers the Final EIR, together with any comments received during the public review process, and may certify the Final EIR and approve the project. In addition, when approving a project for which an EIR has been prepared, the lead agency must prepare findings for each significant effect identified, a statement of overriding considerations if there are significant impacts that cannot be mitigated to a less-than-significant level, and a mitigation monitoring program.

2 EXECUTIVE SUMMARY

PROJECT TITLE	FOURTH & CENTRAL
ENVIRONMENTAL CASE NO.	ENV-2021-4071-EIR
RELATED CASES	CPC-2021-4069-GPAJ-VZCJ-HD-CU-MCUP-SPR-HCA CPC-2021-4070-DA VTT-82974-CN-HCA

PROJECT LOCATION	400 S. Central Avenue (364–464, 425-433 S. Central Avenue; 715 and 730 E. 4th Street); Los Angeles, CA 90013
COMMUNITY PLAN AREA	CENTRAL CITY
GENERAL PLAN DESIGNATION	LIGHT INDUSTRIAL
ZONING	M2-2D/M2-2D-O
COUNCIL DISTRICT	14 – KEVIN DE LEON

LEAD CITY AGENCY	**City of Los Angeles**
CITY DEPARTMENT STAFF CONTACT	DEPARTMENT OF CITY PLANNING Alan Como, AICP
ADDRESS	221 NORTH FIGUEROA STREET, SUITE 1350 LOS ANGELES, CA 90012
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APPLICANT	CP LA Cold Storage Land, LLC
ADDRESS	1881 16th Street, 5th Floor, Denver, CO 80202
PHONE NUMBER	ROGER PECSOK 720-946-4649

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

☐ Aesthetics	☒ 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.

Alan Como, City Planner	March 10, 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 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

The Fourth & Central Project (Project) would generally be located at 400 South Central Avenue and consists of three distinct sites (North, South and West Sites – collectively referred to as the Project Site), with a total land area of approximately 7.6 acres (333,602 gross sf of lot area pre-dedication). The Project Site is comprised of the following areas: North Site (1.35 acres) located at the northeast corner of 4th Street and Central Avenue; South Site (5.98 acres) located south of 4th Street between Central Avenue and Alameda Street; and West Site (0.32 acres) located at the northwestern intersection of Gladys Avenue and Central Avenue. For purposes of this Initial Study, South Central Avenue, East 4th Street, and South Alameda Street are referred to as Central Avenue, 4th Street and Alameda Street, respectively.

The Project would demolish the existing surface parking and cold storage facility uses on the West and South Sites, and intends to adaptively reuse, if feasible, a portion of a six-story cold storage building on the North Site, while demolishing the remaining warehouse uses. The Project would include a mix of residential, office, restaurant/retail, and hotel uses within 10 distinct buildings over the three Sites totaling approximately 2,318,534 sf, for a floor area ratio (FAR) of 6.95:1. The Project would include: 1,521 residential units, including affordable housing units, totaling approximately 1,731,849 sf; approximately 411,113 sf of office uses; approximately 101,088 sf of restaurant/retail uses; and, 68 hotel rooms (74,484 sf of hotel floor area). The Project would include approximately 163,325 sf of Code required private open space. The Project would include approximately 90,113 sf of publicly accessible open space, including paseos passing between Central Avenue and Alameda Street, plazas, and pocket parks within the North and South Sites. The proposed buildings would range in height from 2 to 44 stories, with a maximum height of approximately 497 feet. The Project would provide 2,475 vehicle parking spaces within subterranean parking (up to 4 levels) and podium parking. The Project would also provide a total of 145 short-term bicycle parking spaces and 595 long-term bicycle parking spaces.

Each of the Project uses are shown by building within the three areas of the Project Site (e.g., North Site, South Site, and West Site) in **Table 3-1**, *Project Use and Floor Area Summary*.

3.2 ENVIRONMENTAL SETTING

Project Location

The Project Site is generally located at 400 Central Avenue and is made up of six (6) parcels, with a total land area of approximately 7.6 acres (333,602 gross sf of lot area). The parcels that make up the Project Site are clustered across three City blocks and include the following three areas:

- The 1.35-acre North Site (APN 5147-001-007) is generally located at the northeast corner of Central Avenue and 4th Street.
- The 5.98-acre South Site (APN 5147-013-016) is generally bound by 4th Street to the north, Alameda Street to the east, Central Avenue to the west and industrial uses to the south. The southern boundary of the South Site generally terminates near the intersection of 5th Street and Central Avenue.

- The 0.32-acre West Site (APNs 5147-012-015, 5147-011-015, -016, -017) is generally located west of the intersection of Gladys Avenue and Central Avenue.

Table 3-1
Project Use and Floor Area Summary

	Square Feet Residential Floor Area	Square Feet Restaurant/ Retail Floor Area	Square Feet Office Floor Area	Square Feet Hotel Floor Area	Vehicle Parking Spaces	Long-Term Bicycle Parking Spaces	Short-Term Bicycle Parking Spaces
North Site							
Building 1	44,660	16,378	—	—	33	9	9
Building 2	649,911 (449 units)	12,694	—	—	514	27	195
Subtotal North Site	*694,571*	*29,072*	*—*	*—*	*547*	*36*	*204*
South Site							
Building 3	—	15,291	81,854	—	195	17	25
Building 4	—	7,721	184,162	—	385	23	41
Building 5	407,217(425 units)	11,359	—	—	473	25	188
Building 6	88,228(68 units)	15,567	—	74,484 (68 rooms)	126	21	69
Building 7	126,555 (123 units)	12,357	—	—	154	17	94
Building 8	—	4,645	145,097	—	301	18	33
Building 9	293,574(312 units)	5,076	—	—	321	19	156
Subtotal South Site	*915,574*	*72,016*	*411,113*	*74,484*	*1,955*	*140*	*606*
West Site							
Building 10	121,704 (144 units)	—	—	—	152	11	97
Total Floor Areas, Units	**1,731,849 (1,521 units)**	**101,088**	**411,113**	**74,484 (68 rooms)**	**2,475**	**146**	**596**
Total Floor Area Ratio:		**Land Area (pre-dedication): 333,602 sf**		**Total Floor Area: 2,318,534 sf**	**Total Floor Area Ratio (FAR): 6.95**		

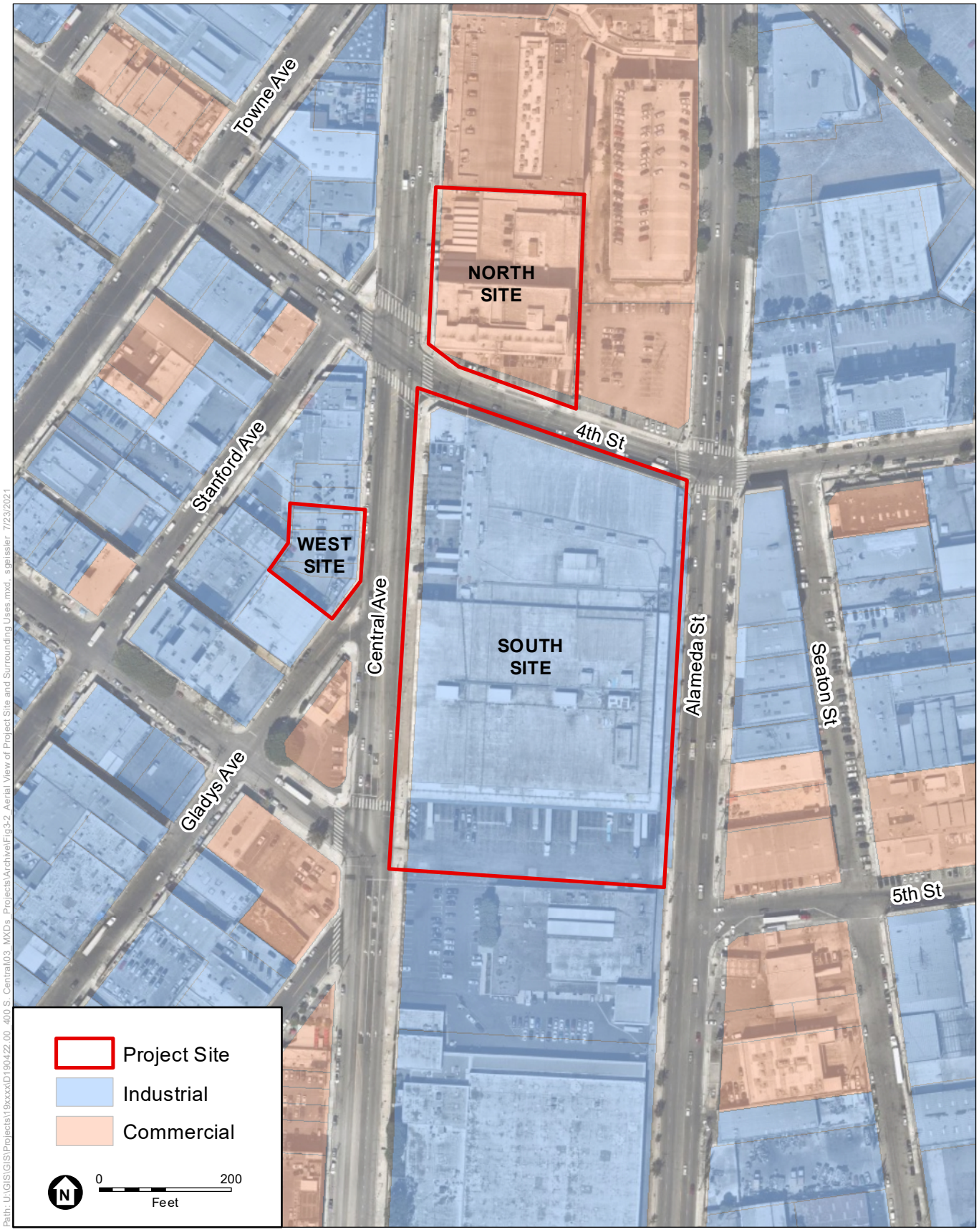
SOURCE: Studio One Eleven, February 2022.

As shown on **Figure 3-1**, *Regional and Local Vicinity Map*, the Project Site is served by a network of regional transportation facilities that provide access to the greater Los Angeles metropolitan area. Regional access to the Project Site is provided by Interstate 10 (I-10), which runs east-west approximately 1-mile south of the Project Site (at its closest point); United States Route 101 (US-101), which generally runs north-south and is located both north and east of the Project Site, with the closest segment of US-101 located approximately 0.7 miles north of the Project Site, Interstate 5 (I-5), which runs north-south approximately 1.1 miles east of the Project Site, and Interstate 110 (I-110), which runs north-south approximately 1.2 miles west of the Project Site (at its closest point). Local access to the Project Site is provided by 4th Street, Central Avenue, and Alameda Street. **Figure 3-2**, *Aerial View of Project Site and Surrounding Uses*, provides an aerial view of the Project Site and its surrounding uses, which are described further below.

SOURCE: ESRI Imagery.

Fourth & Central Project

Figure 3-1
Regional and Local Vicinity Map



SOURCE: ESRI Imagery.

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Figure 3-2
Aerial View of Project Site and Surrounding Uses

The Project Site is located in an area served by a variety of mobility options and is within walking distance of major transit options. The Project Site is also located within a Transit Priority Area, which is defined by the Public Resources Code as an area within 0.5 miles of an existing or planned major transit stop. (Pub. Res. Code, § 21099(a).) Bus and light rail service is provided by the Los Angeles County Metropolitan Transportation Authority (Metro) and Los Angeles Department of Transportation (LADOT). The closest bus stop to the Project Site is located at Alameda Street and 4th Street, approximately 100 feet northeast of the Project Site, which is served by the LADOT Downtown Area Short Hop (DASH) Route A, which is a downtown route that connects the Arts District and Little Tokyo with the rest of Downtown Los Angeles. Other bus lines in the vicinity of the Project Site include Metro bus lines 16, 18, 53, 50, 62, 72, and 760 and LADOT DASH Route D.

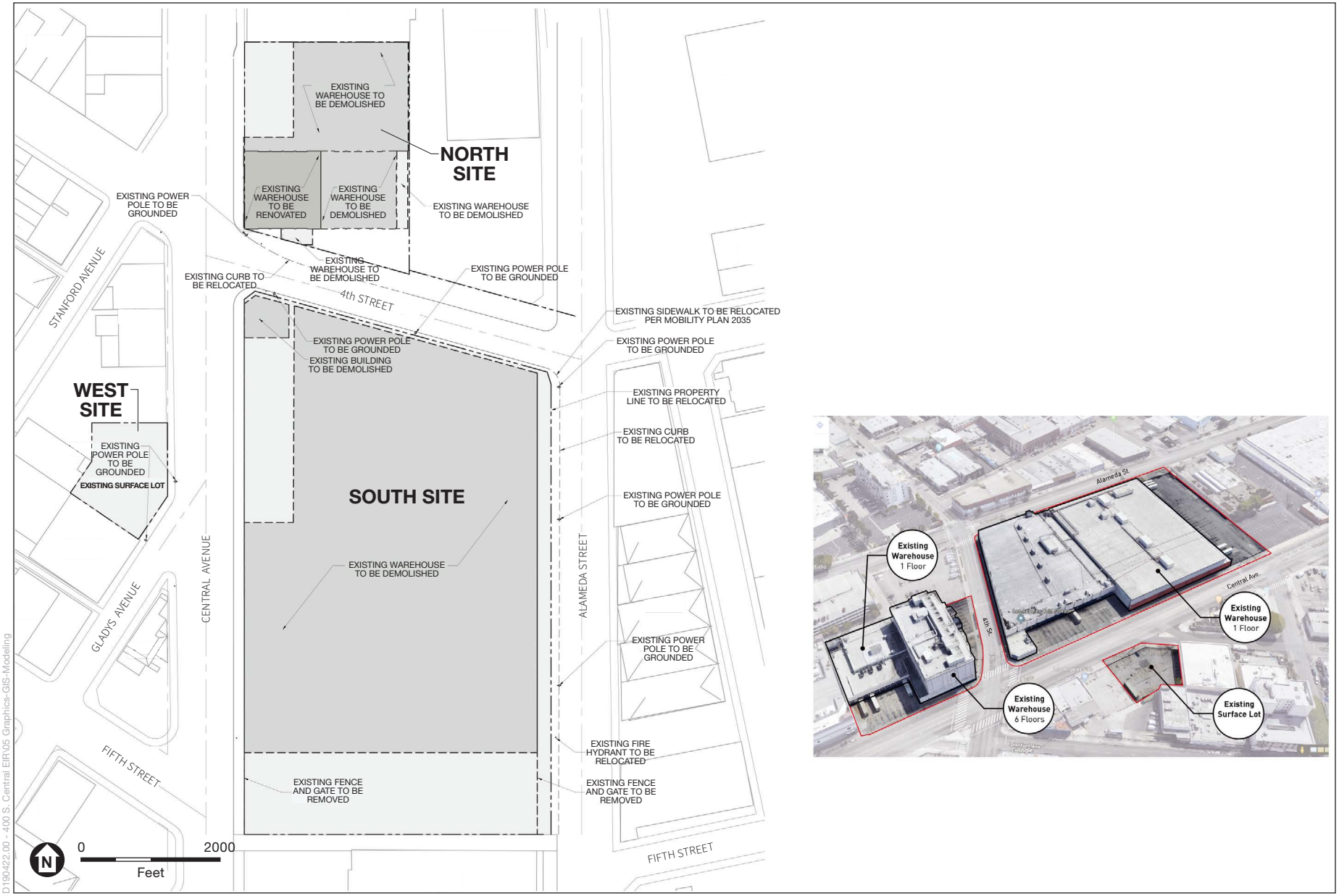
The Project Site is also located within walking distance (less than 0.4 miles) of the Metro Regional Connector Little Tokyo/Arts District station that is currently under construction and scheduled to be open and operational in 2022. The Regional Connector Project extends the Metro L Line from the Little Tokyo/Arts District Station to the 7th Street Metro Center Station in Downtown Los Angeles, allowing passengers to transfer to Metro's A Line, E Line, B Line and D Lines, bypassing Union Station. The 1.9-mile alignment will serve Little Tokyo, the Arts District, Civic Center, the Historic Core, Broadway, Grand Avenue, Bunker Hill, Flower Street, and the Financial District. Three new transit stations will be developed with operation of the Metro Regional Connector. The closest new transit station will be located at 1st Street and Central Avenue, less than 0.4 miles north of the Project Site.

Existing Conditions

As previously described, the Project Site is comprised of three distinct sites fronting Central Avenue. These include the North Site, located at the northeast corner of 4th Street and Central Avenue; the South Site, located south of 4th Street between Central Avenue and Alameda Street; and the West Site, located at the northwestern intersection of Gladys Avenue and Central Avenue. Currently, the Project Site is occupied by cold storage facilities that include warehouse and wholesale commercial buildings and associated office space, truck loading docks, and surface parking. The existing buildings on the Project Site total approximately 360,734 sf of floor area. **Figure 3-3**, *Existing On-Site Uses*, illustrates the existing buildings and uses on the Project Site. Existing views of the Project Site from the adjacent streets are illustrated in photographs presented in **Figure 3-4**, *Photographs of Existing On-site Buildings and Uses*.

As shown in Figure 3-3, the North Site is currently developed with a six-story cold storage warehouse building and attached single-story warehouse. The six-story warehouse also includes a one-level basement, which is not counted as part of the six, above ground stories. The combined floor area of the two buildings is approximately 167,596 sf. Approximately 20 loading docks for the North Site are located along 4th Street and Central Avenue. The SurveyLA Historic Resources Survey Report for the Central City Community Plan area identifies the existing six-story warehouse building built in the early 1900's on the North Site (715 E. 4th Street) as an individual resource. The North Site was constructed as a cold storage warehouse facility between 1903 and 1906 and has been in continuous use by the same company, the Los Angeles Cold Storage Company, since its construction.

The South Site is developed with a single-story high-bay warehouse cold storage building totaling approximately 190,267 sf and a conjoining 2,871 sf, single-story office building, constructed between 1957 and 1959, respectively. The two buildings have a total floor area of approximately 193,138 sf. The South Site also includes 47 loading docks and paved surface parking with approximately 33 spaces that serve the warehouse building.

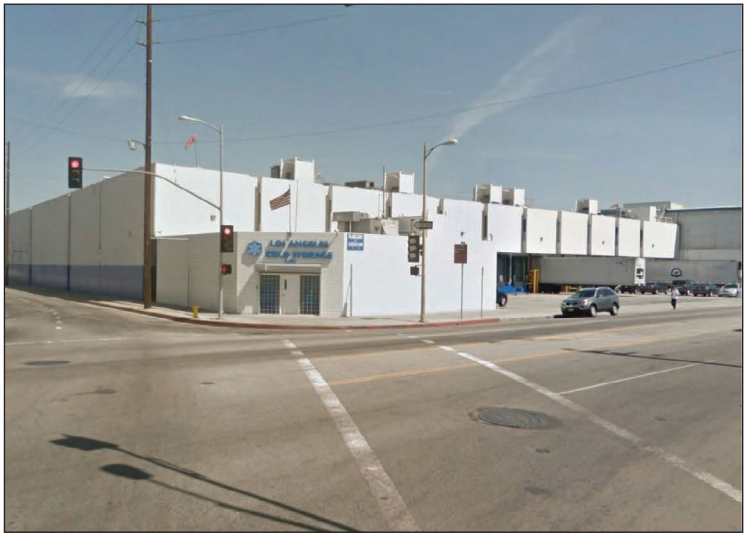


D190422.00 - 400 S. Central EIR\05 Graphics-GIS-Modeling

SOURCE: Studio One Eleven, 2021

Fourth & Central Project

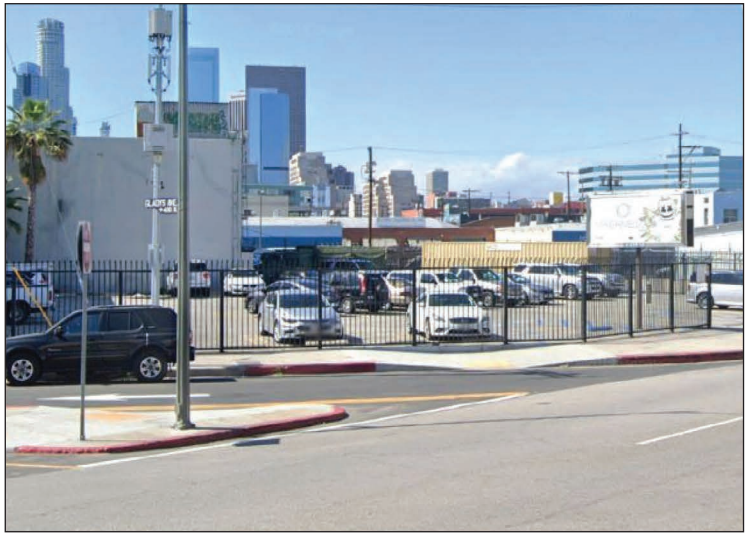
Figure 3-3
Existing On-site Uses



PHOTOGRAPH 1: East-Facing view of the Los Angeles Cold Storage building in the South Site from the intersection of Central Avenue and 4th Street.

PHOTOGRAPH 2: Southeast-facing view of the Los Angeles Cold Storage building in the South Site from the intersection of Alameda Street and 4th Street.

PHOTOGRAPH 3: North-facing View of the Los Angeles Cold Storage six-story historic building in the North Site from the intersection of Central Avenue and 4th Street.



PHOTOGRAPH 4: West-facing view of the Los Angeles Cold Storage surface parking lot in the West Site from the intersection of Central Avenue and Gladys Avenue.

D190422.00

SOURCE: Studio One Eleven, 2021

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Figure 3-4
Photographs of Existing On-site Buildings and Uses

The West Site provides 39 parking spaces in a fenced, paved lot and is not improved with any buildings. The paved lot allows for additional parking for the existing cold storage facilities across Central Avenue on the North and South Sites.

Above ground utility lines are present at the intersection of Central Avenue and 4th Street, and along the south side of 4th Street and the west sides of Central Avenue and Alameda Street adjacent to the Project Site. There is no landscaping on the Project Site. On-Site vegetation is limited to 20 fern pines (*Podocarpus* sp.) within the adjacent roadway right-of-way, with ten trees being located on the southern boundary of the North Site (along 4th Street) and ten trees along the eastern boundary of the South Site along Alameda Street. These are not a protected species; however, each of these street trees would be replaced at a ratio of 2:1 by the Project.

Existing Planning and Zoning

The Project Site, which is within the planning boundary of the Central City Community Plan, has a General Plan land use designation of Light Industrial and is zoned M2-2D-O on the North Site and M2-2D on the South and West Sites.[2] This zoning permits a range of industrial uses prevalent in the area such as warehouses and cold storage facilities, and also permits commercial and office uses. The "2D" indicates Height District 2D, which does not limit the height of buildings on these properties, but limits the FAR to 3:1. The "O" designation indicates that the Project Site is located within an oil drilling district where the drilling of oil wells or the production from oil wells, gas, or other hydrocarbon substances is permitted.

The Project Site is located within a State Enterprise Zone (City of Los Angeles Department of City Planning Zoning Information [ZI] No. 2374) and the Greater Downtown Housing Incentive Area (City of Los Angeles Department of City Planning ZI No. 2385), which were both established to stimulate local investment. State Enterprise Zones provide business owners within the Zone boundaries with State incentives such as tax credits and deductions for hiring eligible employees, credits for sales and use taxes paid on qualifying machinery and electronic equipment, additional business expense deductions, and credits to lenders for loans made to Enterprise Zone businesses. The Greater Downtown Housing Incentive Area was created to incentivize housing development within the boundaries of the area. [Los Angeles Municipal Code (LAMC)Section 12.22 A.29. The Greater Downtown Housing Incentive Area was adopted with the intent of not only incentivizing the development of additional housing, but to also facilitate the development of affordable and workforce housing within the area.

The North Site and West Site are also located within the boundaries of the Central Industrial Redevelopment Project area, as designated by the now-defunct Community Redevelopment Agency for the City of Los Angeles (CRA/LA). The redevelopment plan for the Central Industrial Redevelopment Project was adopted on November 15, 2002, and expires in November 2032.

On September 30, 2019, the City Council and Mayor approved a resolution and accompanying Ordinance No. 186,325, transferring the land use authority from the former CRA/LA to the City. The City is now responsible for implementing and enforcing unexpired redevelopment plans and

[2] The City's ZIMAS website identifies the Project Site's General Plan land use as "Light Manufacturing." However, the Central City Community Plan identifies the Project Site as "Light Industrial." The Community Plan land use map does not include a Light Manufacturing land use designation, and as such, the Project Site is herein identified as Light Industrial.

associated development guidelines. As such, the City is the presiding agency for all land use approvals within the Central Industrial Redevelopment Project area.

The City of Los Angeles Department of City Planning ZI No. 2452 [Transit Priority Areas (TPAs)/ Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA] was developed in response to Senate Bill (SB) 743, which, pursuant to Section 21099(d)(1) of the Public Resources Code (PRC), states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if: (1) the project is a residential, mixed-use residential, or employment center project, and (2) the project is located on an infill site within a TPA. PRC Section 21099 defines the criteria for an infill site and TPAs. Specifically, "infill site" is defined as a location within an urban area that has been previously developed, or a vacant site "where at least 75 percent of the perimeter of the site adjoins an improved public right-of-way. "TPAs" are defined as areas within 0.5 miles of a major transit stop that is existing or planned. A "major transit stop" is defined as a site containing an existing rail transit station or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. Under ZI No. 2452, a project shall be considered to be within a TPA if all parcels within the project have no more than 25 percent of their area farther than 0.5 miles from the major transit stop.

The Project proposes the development of a cohesive mix of residential, hotel, retail/commercial, office, and community uses on a previously developed "infill" site. The entire Project Site is located within approximately 0.5 miles of the planned and under construction Metro L Line Little Tokyo/Arts District Station at East 1st Street and Central Avenue to the north of the Project Site. As such, the Project would meet the criteria of SB 743 and ZI No. 2542. As discussed in ZI No. 2542, visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas, and any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact, unless evaluation is required under other land use regulations of the LAMC.

Surrounding Land Uses

Locally, the Project Site is in a highly urbanized area and situated on the eastern border of the Central City East District, which is largely developed with general commercial and manufacturing uses such as wholesale, warehouse, and food processing facilities. Alameda Street, which borders the Project Site to the east, and separates the Central City East District and the Arts District. Thus, the Project Site is located adjacent to the Arts District, which is an emerging neighborhood in the City's Downtown area and has experienced an increased demand for new retail, hotel, creative office, and residential spaces. The Project Site is also situated just south of the Little Tokyo neighborhood, where numerous former warehouse structures are being converted to artists' workshops, live-work spaces, and neighborhood-serving retail and commercial uses.

Specific to the immediate surrounding area, as shown in Figure 3-4, uses directly north of the North Site include a three-story commercial shopping center (Little Tokyo Market Place). A six-story parking structure and surface parking lot are located directly east of the North Site.

The South Site is located south of 4th Street between Central Avenue and Alameda Street. The North Site and a surface parking lot are located to the north of 4th Street. A mix of one to three-story warehouse/light manufacturing and commercial uses are located east and west of the South Site, across Central Avenue and Alameda Street, respectively. Directly south of the South Site is a low-rise distribution center (Young's Market) and associated parking and loading dock areas. The West Site is adjacent to low-rise warehouse/light manufacturing and supporting surface parking.

3.3 DESCRIPTION OF PROJECT

Project Overview

The Project would demolish all of the existing improvements, uses, and surface parking on the South and West Sites. On the North Site, the single-story warehouse would also be demolished, however, the Project intends to preserve and adaptively reuse a portion of the existing six-story industrial building on the North Site for retail and residential amenity purposes. In place of the existing industrial uses and surface parking, the Project would develop a mix of residential, hotel, retail/commercial, office, and community uses within 10 distinct buildings on the North, South and West Sites. As cited above, the Project's ten buildings would comprise a total of 2,318,534 sf of floor area with a FAR of 6:95:1.

Figure 3-5, *Proposed Program Diagram*, provides a three-dimensional rendering and overall configuration of the Project's ten buildings. **Figure 3-6**, *Conceptual Site Plan*, illustrates the location of the proposed buildings and the Project Site from a "bird's eye" view. Figure 3-6 depicts the layout of buildings and the relative location of driveways, open space, and rooftops and terraces relative to the outline of each building. **Figure 3-7**, *Ground Level Plan*, shows the overall Project Site and uses located at ground level, including the surface parking area within the West Site and driveway access. **Figure 3-8**, *Site Dimensions and Building Heights*, illustrates the number of stories and general dimensions for driveways, sidewalks, lot areas, and building footprints. **Figure 3-9**, *Ground Level Uses*, shows the breakdown between retail (including restaurant), residential, office, and hotel uses occurring at the first floor level.

Building components are summarized in Table 3-1, above, and building heights and uses are further summarized in **Table 3-2**, *Building Stories, Heights, and Uses*.

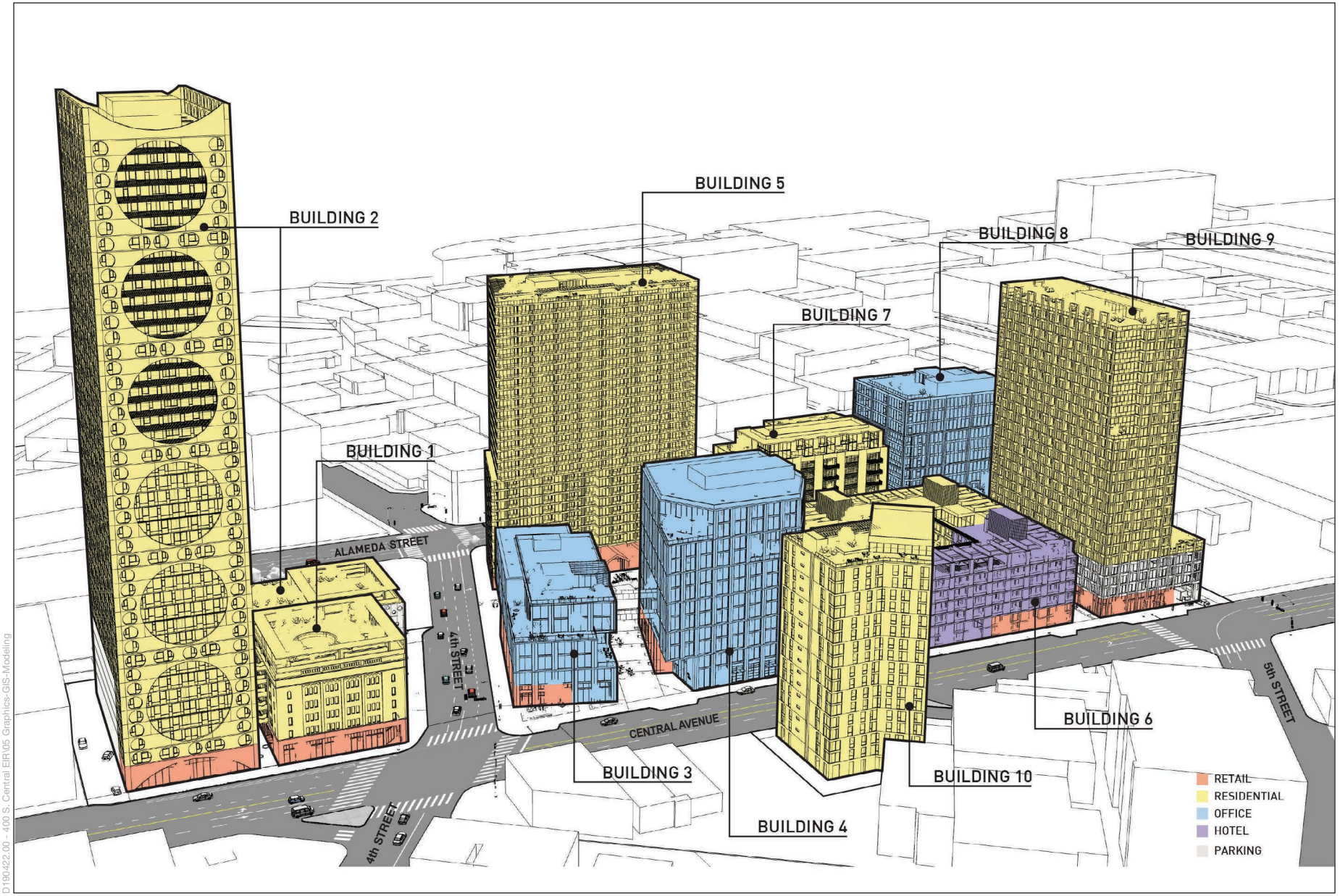
Table 3-2
Building Stories, Heights and Uses

Project Building #	Stories[a]	Building Height to the top of the Parapet	Uses
Building 1	6	74 feet	Restaurant/Retail, Residential Amenities
Building 2	44	497 feet	Residential, Restaurant/Retail
Building 3	7	93 feet	Restaurant/Retail, Offices
Building 4	12	168 feet	Restaurant/Retail, Offices
Building 5	28	292 feet	Residential, Restaurant/Retail
Building 6	6	96 feet	Residential, Restaurant/Retail, Hotel
Building 7	10[b]	124 feet	Residential, Retail
Building 8	12	156 feet	Offices, Retail
Building 9	27	284 feet	Residential, Retail
Building 10	18	181 feet	Residential

[a] Stories include rooftop floors that include indoor structures (i.e., amenity rooms).

[b] There is a detached trio of 2-story industrial sheds adjacent to Alameda Street, which are accounted for as part of Building 7.

SOURCE: Studio One Eleven, February 2022.



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SOURCE: Studio One Eleven, 2021

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Figure 3-5
Proposed Program Diagram

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SOURCE: Studio One Eleven, 2021

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Figure 3-6
Conceptual Site Plan

SOURCE: Studio One Eleven, 2021

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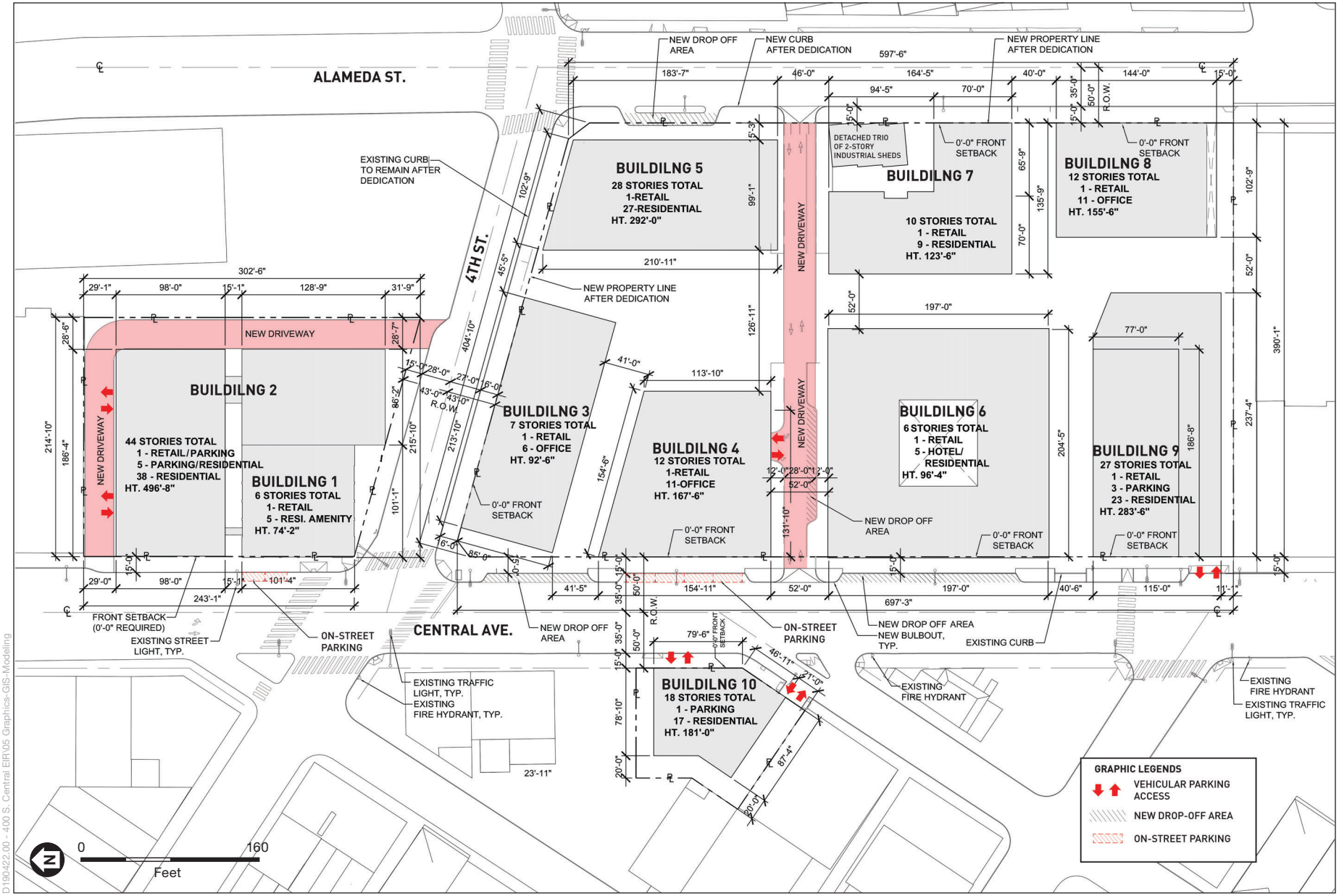
Figure 3-7
Ground Level Plan



SOURCE: Studio One Eleven, 2022

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Figure 3-8
Site Dimensions and Building Heights

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SOURCE: Studio One Eleven, 2021

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Figure 3-9
Ground Level Uses

The Project would provide 1,521 residential units totaling approximately 1,731,849 sf, approximately 411,113 sf of office uses, approximately 101,088 sf of restaurant/retail uses, and 68 hotel rooms totaling approximately 74,484 sf. The Project is requesting a General Plan Amendment to change the Project Site's land use designation from Light Industrial to Regional Commercial, and a corresponding Vesting Zone and Height District Change to C2-2. Accordingly, the Project is subject to certain Measure JJJ provisions, codified as LAMC Section 11.5.11. The Project will set aside 5% of the total rental units for extremely low income households. In addition, between 11% and 40% of the total units will be set aside for very low, low, or moderate income households.

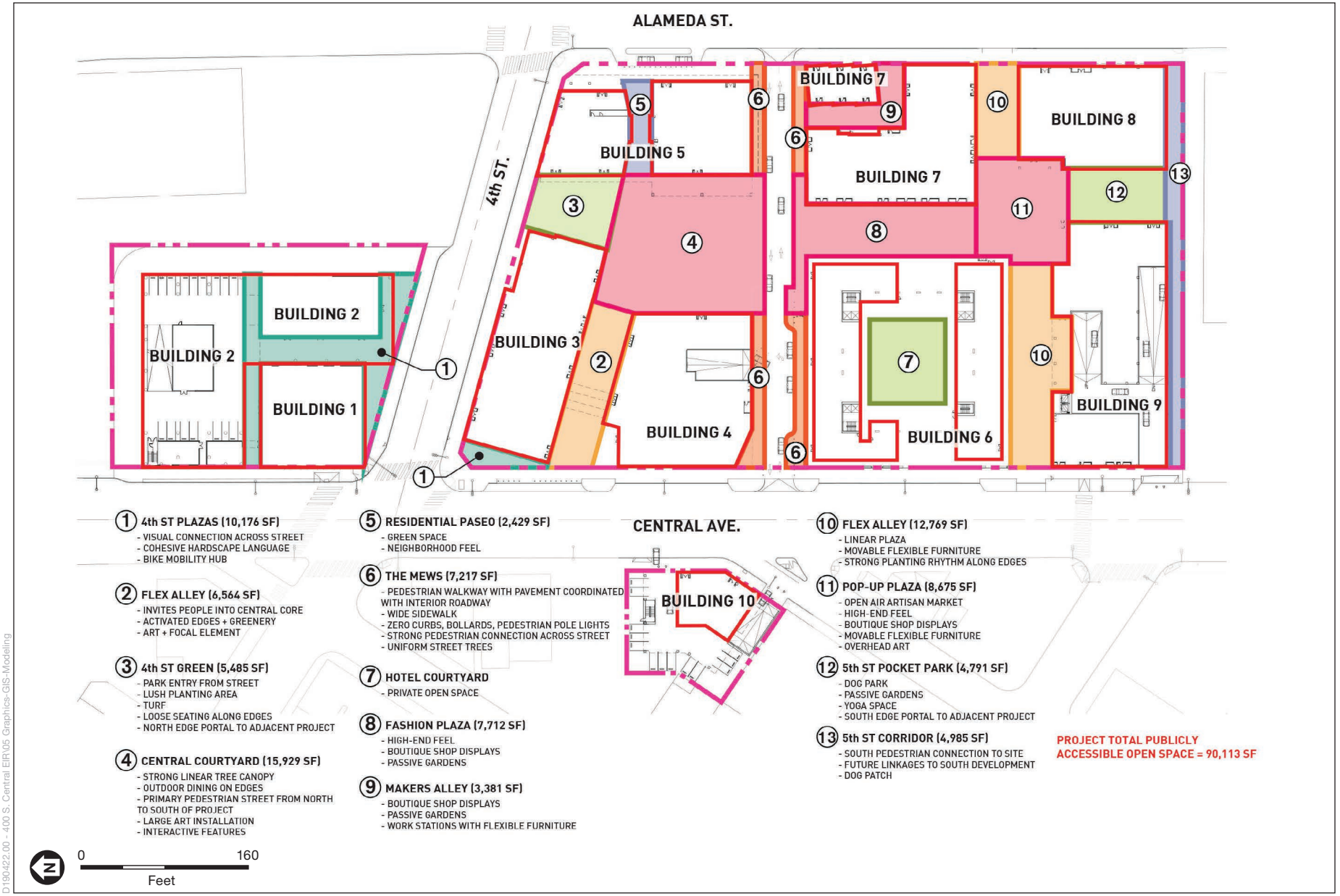
The proposed buildings would range in height from 2 stories to 44 stories, with a maximum height of 497 feet to the top of the parapet. The Project would provide 2,475 parking spaces, a majority of which will be provided within subterranean parking levels. Buildings 2 and 9 would also include fully enclosed and mechanically ventilated above-grade podium parking levels. The Project would also include a total of 145 short-term bicycle parking spaces and 595 long-term bicycle parking spaces, to be included in various areas throughout the Project Site.

North Site – Buildings 1 and 2

The North Site would include the development of two buildings (Buildings 1 and 2) providing approximately 694,571 sf of residential and restaurant/retail floor area. In addition, the North Site would provide an approximately 1,356 sf, publicly accessible plaza at the northeast corner of Central Avenue and 4th Street. This plaza would interface with a similar plaza located directly across 4th Street, at the southeast corner of Central Avenue and 4th Street. The publicly accessible open space would also include a 7,611 sf plaza with access from 4th Street to allow centralized access to restaurants and retail shops. The publicly accessible open space on the North Site is illustrated in **Figure 3-10**, *Publicly Accessible Open Space Plan*.

The Project intends to, if feasible, adaptively reuse a portion of the existing six-story cold storage building at 715 E. 4th Street as part of Building 1 to provide new restaurant/retail uses and residential amenities. The six-story brick building intended to be adaptively reused was originally constructed in the early 1900s and is identified by SurveyLA as eligible for local, state, and national historic registers. If determined feasible, the Project's distinctive reuse of this building is proposed to maintain a direct connection to the neighborhood's industrial past and help preserve its historic character. If it is not feasible to adaptively reuse a portion of the existing six-story cold storage building at 715 E. 4th Street, the building would be demolished in its entirety.

Building 1 would consist of approximately 61,038 sf of floor area, with a height of approximately 74 feet. Building 1 would include approximately 16,378 sf of restaurant/retail floor area within two floors, the first level and the subterranean P1 level (no new excavation below Building 1 would be required by the Project). Design of Building 1 includes a new elevated rooftop cornice similar to Building 2's. Levels 2 through 6 of Building 1 would comprise approximately 44,660 sf of residential amenities to serve the adjacent residential tower (Building 2). At each residential amenity story, Building 1 on its north side would be connected by bridges to Building 2. Uses include leasing offices and residential amenities such as workout rooms and other common use areas such as conference rooms, activity areas and clubhouse spaces. A new rooftop for Building 1 would serve as an open terrace providing flexible space for seating, hardscape, landscape areas, and a pool. The east side of Building 1 would abut Building 2, but would not be connected to Building 2.



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SOURCE: Studio One Eleven, 2021

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Figure 3-10
Publicly Accessible Open Space Plan

Building 2 would be up to 44 stories and would reach a maximum height of approximately 497 feet to the highest point (top of the parapet). The six-story portion of Building 2 would be located immediately adjacent to the east side of Building 1. There would be vehicular drive connections on Levels 2–6 of Building 2 connecting the structured parking in the 44-story portion of Building 2 and the lower 6-story portion of Building 2. There would be retail uses on the ground level of the 6-story portion of Building 2. Overall, Building 2 would comprise a total of approximately 662,605 sf, with the ground level providing approximately 12,694 sf of restaurant/retail floor area.

As explained further below, Levels 1 through 6 in the 44-story portion of Building 2 would include structured parking, which are not included in the building floor area. However, Level 1 would also include retail uses along Central Avenue and Levels 2-6 would include residential units along Central Avenue. These retail and residential uses would screen views Building 1's interior parking structure from Central Avenue. The upper floors (Levels 7 through 44) would consist exclusively of residential units. Building 2 would provide 449 residential units, with a total residential floor area of approximately 649,911 sf. The residential units would range in size from approximately 625 sf to 1,934 sf. The mix of residential units would include 74 studio units, 222 one-bedroom units, 111 two-bedroom units, and 42 three-bedroom units. Level 44, which would provide common open space for residential use, is the building's rooftop.

Structured parking would be provided in Levels 1 through 6 in Building 2 and in four subterranean levels below Building 2 to accommodate 737 vehicle parking spaces, 26 short-term bicycle parking spaces, and 147 long term bicycle parking spaces. Building 2 would provide rooftop amenities including a potential water feature/pool, landscaping, and hardscape/deck areas, shown above in Figure 3-6.

South Site – Buildings 3 through 9

The South Site would include the development of seven buildings (Buildings 3 through 9), with a total residential floor area of 915,574 sf, 411,113 sf of office floor area, 72,016 sf of restaurant/retail floor area, and 74,484 sf of hotel floor area. The South Site would provide a total of 928 residential units, as well as 68 hotel guest rooms. In addition, as illustrated in Figure 3-10, the South Site would provide approximately 83,805 sf of publicly accessible open space on the ground level including several plazas, as well as paseos that would connect Central Avenue to Alameda Street.

Buildings 3 and 4 are envisioned as sister mixed-use office buildings, in which Building 3 would be developed as a 7-story, approximately 97,145 sf building including approximately 15,291 sf of restaurant/retail floor area, and approximately 81,854 sf of office space. Building 3 would be connected to Building 4 via bridges at the fourth and sixth floors. Building 3 would reach a height to the parapet of approximately 93 feet. Building 4 would be developed as a 12-story, approximately 191,883 sf building that would include approximately 7,721 sf of restaurant/retail uses, and approximately 184,162 sf of office space. Building 4 would reach a height to the parapet of approximately 168 feet.

Building 5 would be developed as a 28-story, approximately 418,576 sf mixed-use residential building that would include approximately 11,359 sf of restaurant/retail floor area on the first floor and 425 residential units comprising 407,217 sf in floors 2 through 28. The residential units would range in size from approximately 507 sf to 1,037 sf. The mix of residential units would include 183

studio units,142 one-bedroom units, and 100 two-bedroom units. Building 5 would reach a maximum height to the parapet of approximately 292 feet.

Building 6 would be developed as a 6-story, approximately 178,279 sf combined residential and hotel building that would include approximately 15,567 sf of restaurant/retail floor area. A small portion of the hotel back of house would be located on the P1 level. The building would include 68 residential units (approximately 969 sf each) on floors two through five and 68 hotel rooms (approximately 616 sf each) also on floors two through five. The residential units would include 44 one-bedroom units and 24 two-bedroom units. The building would provide a total of approximately 88,228 sf of residential floor area and 74,484 sf of hotel floor area. Building 6 would reach a maximum height to the parapet of approximately 96 feet.

Building 7 would be developed as a 10-story, 138,912 sf mixed-use residential building and would include approximately 12,357 sf of retail floor area, and 123 residential units within a total residential floor area of 126,555 sf. The building would provide a mix of 35 studio units, 4 live/work units, 62 one-bedroom units, and 22 two-bedroom units, ranging in size from approximately 617 sf to 1,204 sf. Included within the floor area of Building 7 is a detached trio of 2-story industrial sheds, which are live/work units, located along Alameda Street. These three sheds (or live/work units) are the "maker spaces" that comprise Makers Alley (discussed below). The three live/work units are included as part of the overall residential unit count. Building 7 would reach a maximum height to the parapet of approximately 124 feet.

Building 8 would be developed as a 12-story, 149,742 sf mixed-use office building that includes approximately 4,645 sf of retail floor area within the ground floor and approximately 145,097 sf of office space from the ground floor to the 11th floor. Building 8 would reach a maximum height to the parapet of approximately 156 feet.

Building 9 would be developed as a 27-story, 298,650 sf mixed-use residential building that would include approximately 5,076 sf of retail floor area within the ground floor. The building would include 312 residential units comprising approximately 293,574 sf. The building would provide a mix of 88 studio units, 4 live/work units, 186 one-bedroom units, and 34 two-bedroom units, ranging in size from approximately 505 sf to 952 sf. Building 9 would reach a maximum height to the parapet of approximately 284 feet.

Within the South Site, there would be three levels of subterranean parking with additional structured parking on Levels 2, 3, and 4, and a portion of Level 1 of Building 9. The subterranean and podium levels would provide a total of 1,713 vehicle parking spaces, 449 long-term bicycle parking spaces, and 120 short-term bicycle parking spaces.

West Site – Building 10

The West Site would include the development of one building (Building 10). Building 10 would be developed as an 18-story, 121,704 sf residential building with 144 residential units. The unit mix would include 48 studio units, 64 one-bedroom units and 32 two-bedroom units, ranging from approximately 517 sf to 1,065 sf. Building 10 would reach a maximum height to the parapet of approximately 181 feet. Building 10 would provide a landscaped roof deck, one level of subterranean parking, and surface parking to accommodate a total of 25 vehicle parking spaces, 43 long-term bicycle parking spaces, and 4 short-term bicycle parking spaces.

Architecture and Design

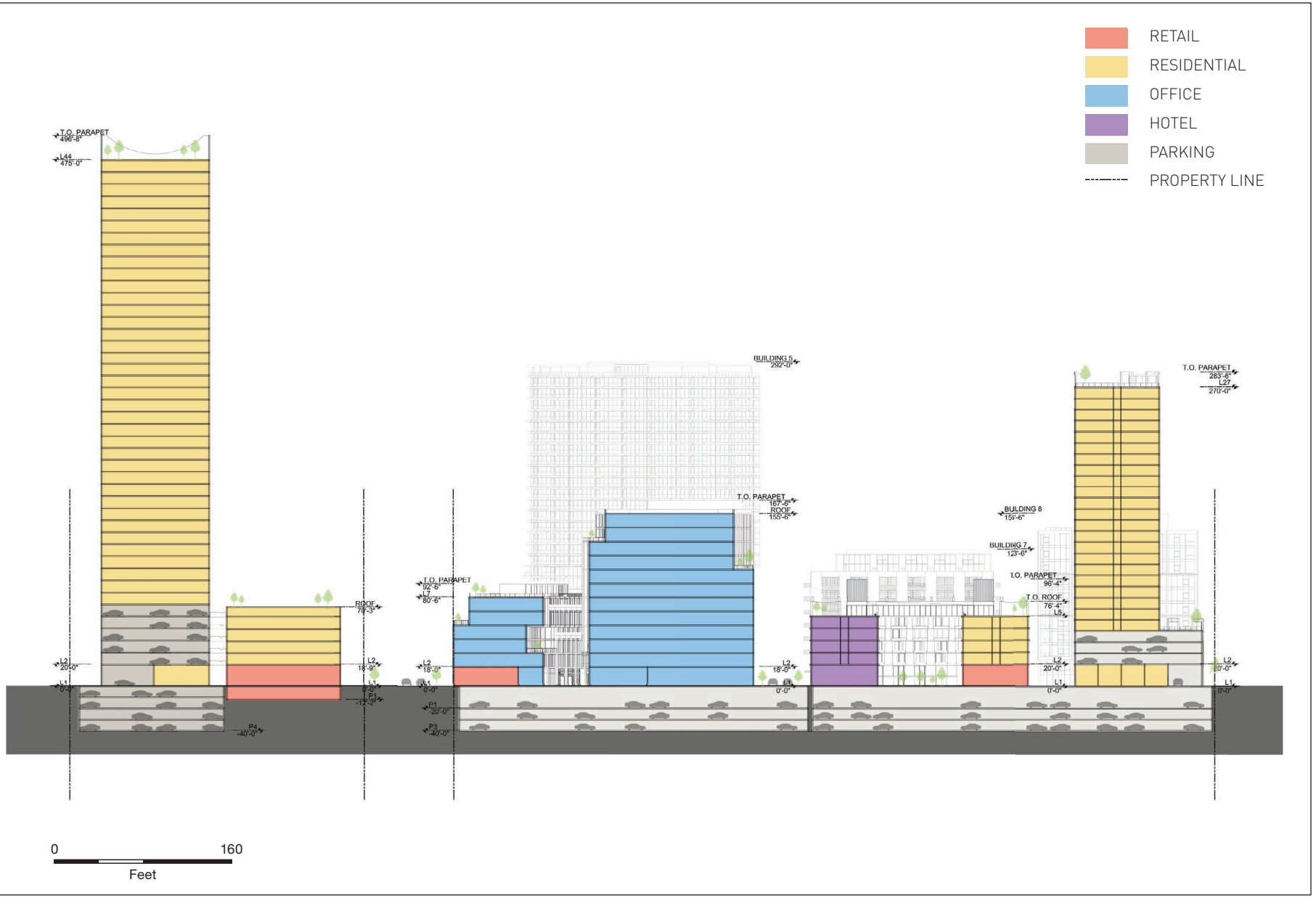
The Project would include the development of 10 separate yet complementary buildings, reflecting the vibrant and diverse nature of the adjoining Little Tokyo, Arts District, and Downtown Industrial District neighborhoods. Each building would be designed with unique architecture and use programs. However, the proposed buildings would be designed to work in relationship with the overall design and program to complement and support the Project as a whole. The buildings include design references to warehouses and lofts, apartment blocks, industrial sheds, and contemporary infill. The architecture would be modern and scaled to address both the Project and the surrounding buildings. The Project would include varied building materials to reinforce the urbanity of the design and the eclectic nature of the individual buildings.

The Project's design strategy is to organize an assemblage of smaller buildings that break down the scale of development to reduce the visual massing impact and emulate the organic urbanism of the neighborhood. This development strategy, in addition to setbacks and varied building articulation, is intended to contribute to a walkable and human-scaled environment. The bulk of the Project is located on the South Site, with 7 buildings positioned around a central north-south pedestrian open space network, featuring 2 plazas and multiple passages with landscaping and seating for socializing and gathering. The South Site is also broken up by an internal east-west drive aisle. A pedestrian throughway referred to as the "Mews" would be along both sides of the drive aisle, with pavement coordinated with internal driveway, wide sidewalks, bollards, pedestrian pole lights, zero curbs, and uniform street trees.

Each building and the Project as a whole, as they would appear as viewed from adjacent streets, are presented in **Figure 3-11**, *Project Site Section from Central Avenue*; **Figure 3-12**, *Project Site Section from Alameda Street*; and **Figure 3-13**, *Project Site Section as Viewed from the South*. These figures illustrate the scale and relationship of the Project's buildings to the individual sites and as a whole Project, as well as illustrate the building stories, terraces, and other building features.

Artist renderings in **Figure 3-14**, *Conceptual Aerial View Toward Downtown Los Angeles*; **Figure 3-15**, *View of Central Avenue at 4th Street*, and **Figure 3-16**, *View of Central Courtyard*, depict the relation of the Project to the surrounding environment and illustrate the various architectural styles contemplated for the proposed buildings. In addition to renderings of the Project, Figures 3-17 through 3-20 illustrate the exterior materials and treatments for each of the Project's buildings. Buildings 1 and 2 are illustrated in **Figure 3-17**, *North Site Exterior Building Materials – Viewed from Central Avenue*. **Figure 3-18**, *South Site Exterior Building Materials – Viewed from Central Avenue*, illustrates the exterior treatment for Buildings 3, 4, 6, and 9. **Figure 3-19**, *South Site Exterior Building Materials – Viewed from Alameda Street*, illustrates the exterior treatment for Buildings 5, 7, and 8. **Figure 3-20**, *West Site Exterior Building Materials – Viewed from Central Avenue*, illustrates the exterior treatment for the 16-story Building 10.

Building 1 (6 stories), the intended adaptive re-use of the early 1900's LA Cold Storage Building at the northeast corner of 4th Street and Central Avenue, would maintain a direct connection to the history of the neighborhood. As shown in Figure 3-17, the design of Building 1 closely resembles its windowless origins, but with added multiples of new windows in the style of its original mimicked window façade details, fresh grey paint, bridge connections to the adjacent Building 2 and new storefronts along the ground floor. The most prominent update to the exterior is a bush hammered purple concrete parapet and elevated rooftop cornice similar to Building 2's.



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SOURCE: Studio One Eleven, 2021

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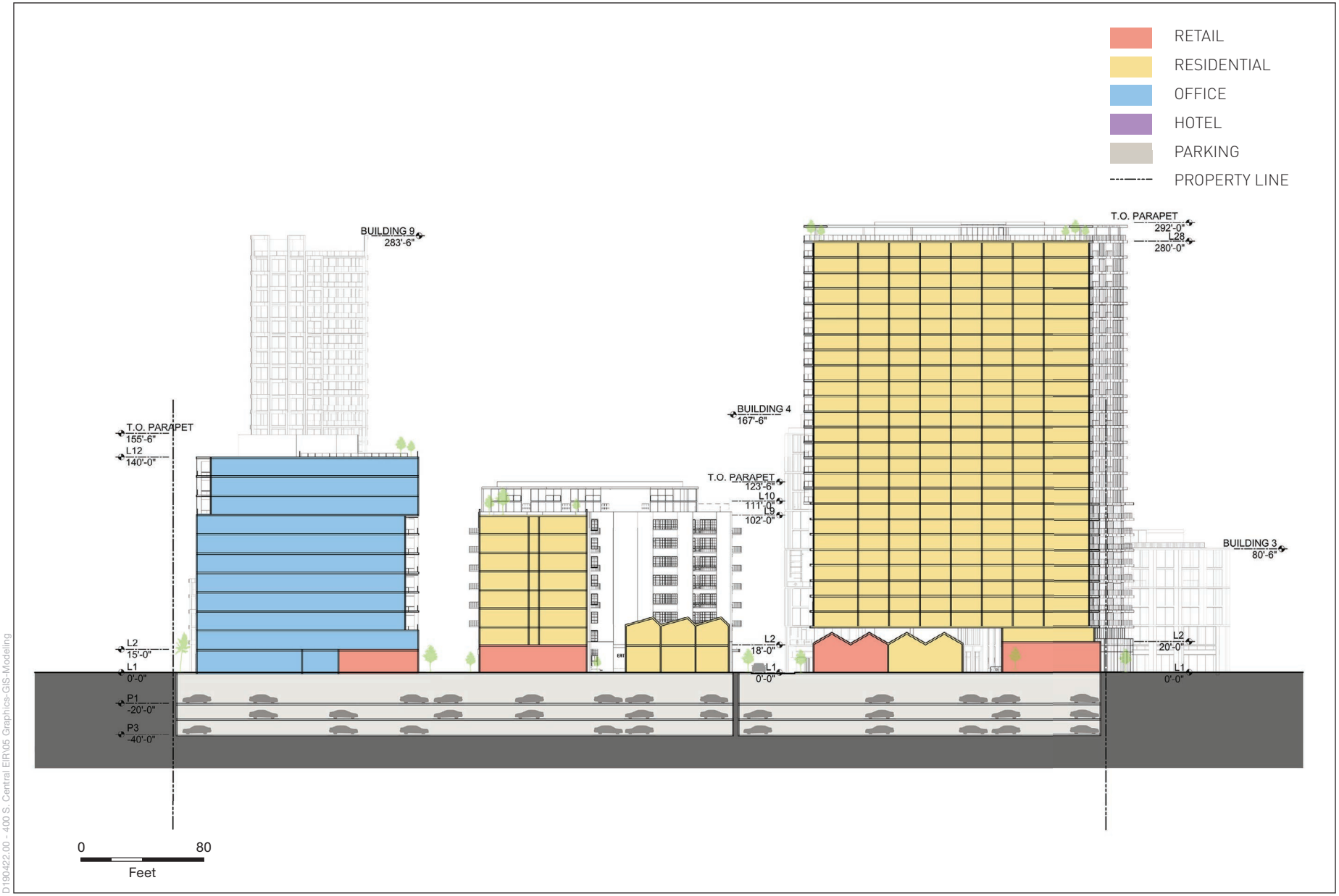
Figure 3-11
Project Site Section from Central Avenue



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SOURCE: Studio One Eleven, 2021

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Figure 3-12
Project Site Section from Alameda Street

SOURCE: Studio One Eleven, 2021

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Figure 3-13
Project Site Section as Viewed from the South

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SOURCE: Studio One Eleven, 2021

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Figure 3-14
Conceptual Aerial View Toward Downtown Los Angeles

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SOURCE: Studio One Eleven, 2021

Fourth & Central Project

Figure 3-15
View of Central Avenue at 4th Street

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SOURCE: Studio One Eleven, 2021

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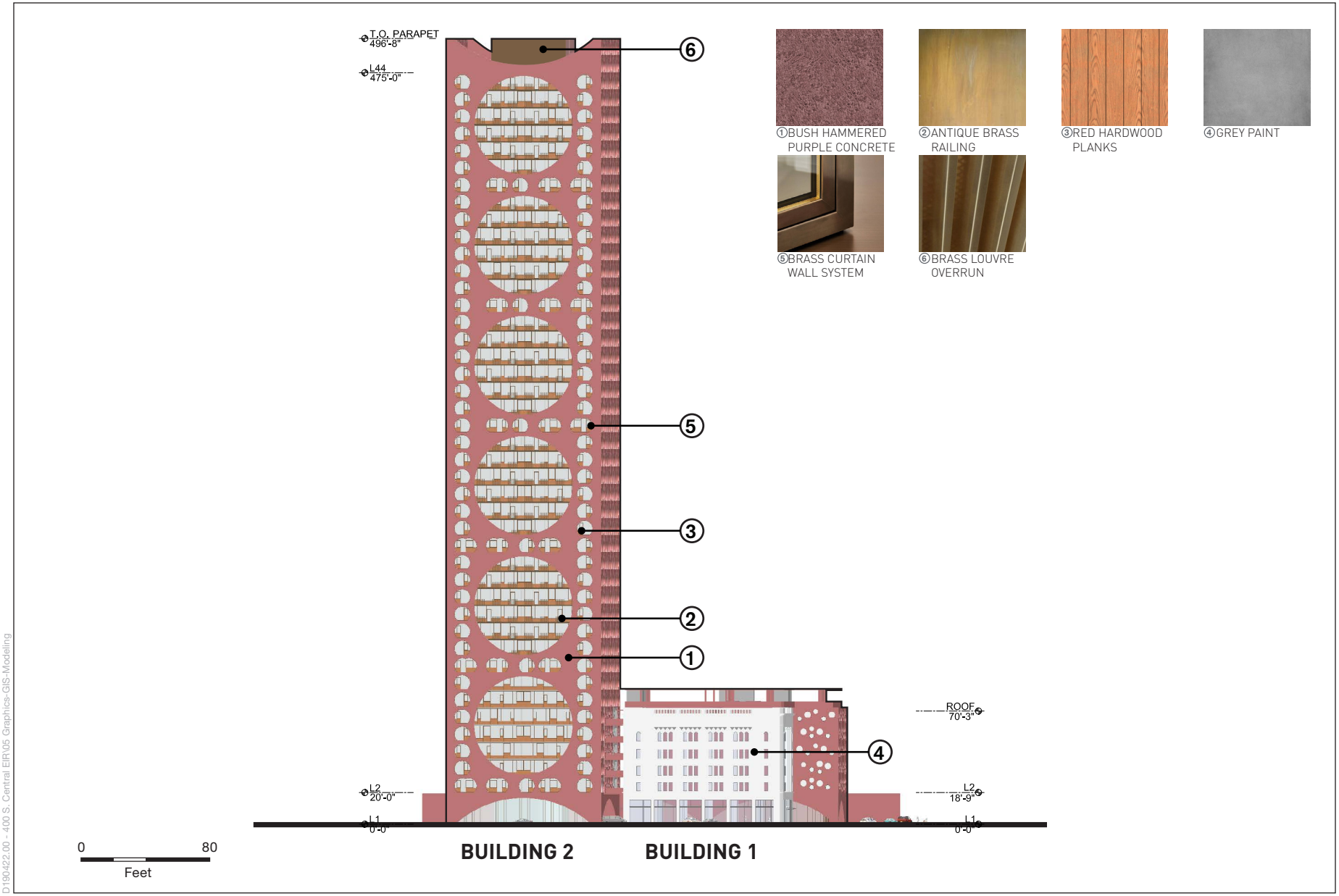
Figure 3-16
View of Central Courtyard



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SOURCE: Studio One Eleven, 2021

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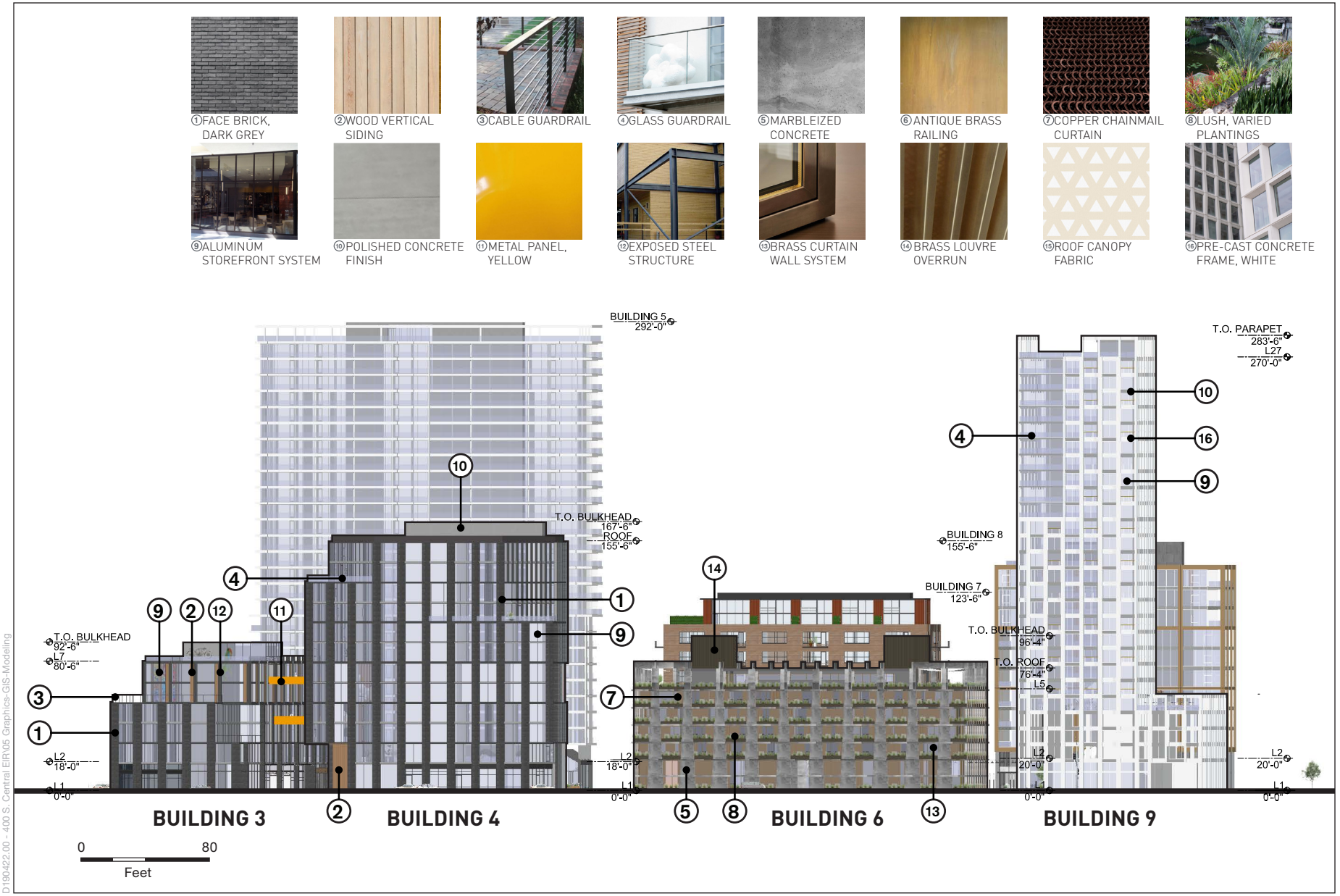
Figure 3-17
North Site Exterior Building Materials – Viewed from Central Avenue



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SOURCE: Studio One Eleven, 2021

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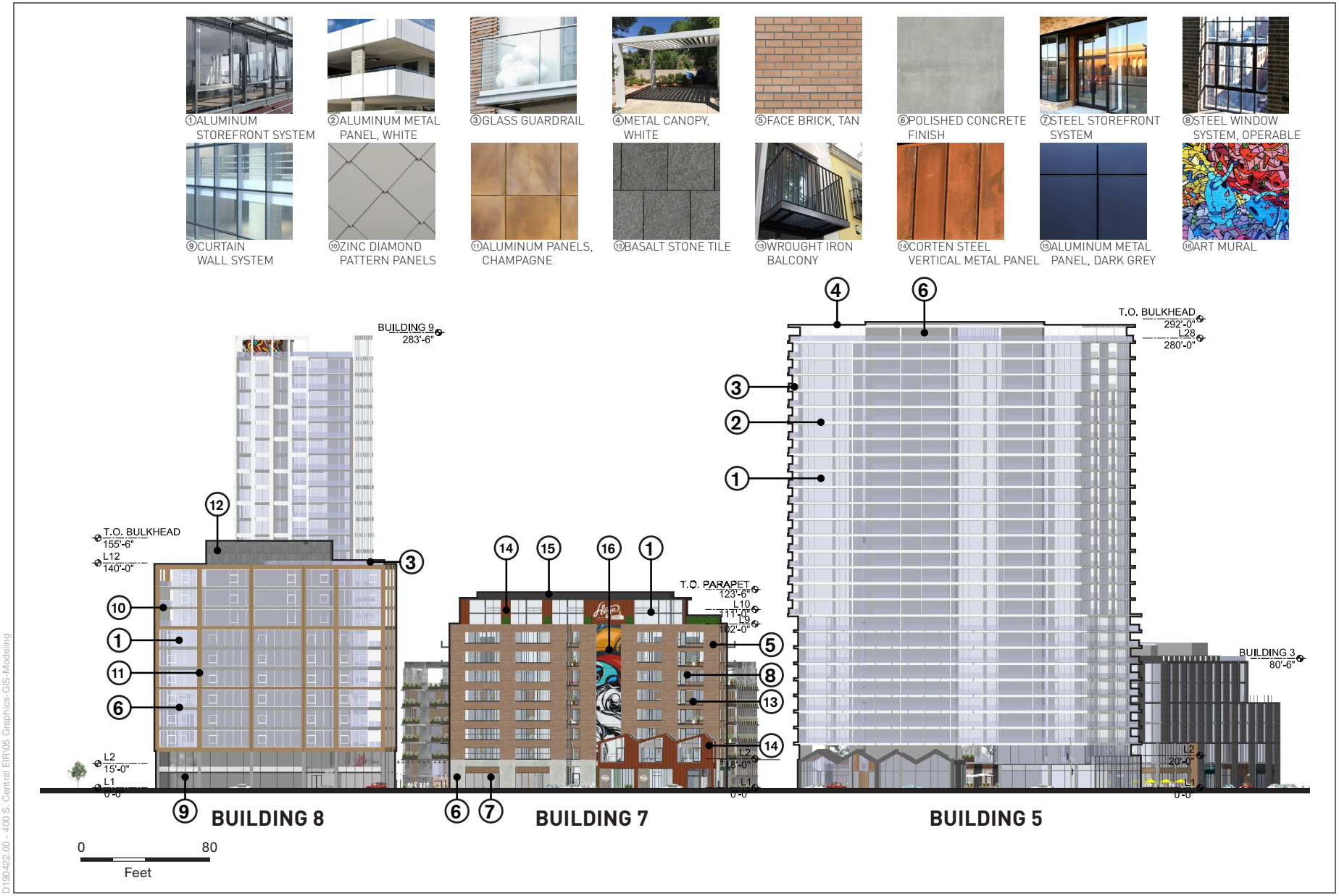
Figure 3-18
South Site Exterior Building Materials – Viewed from Central Avenue



SOURCE: Studio One Eleven, 2021

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Figure 3-19
South Site Exterior Building Materials – Viewed from Alameda Street

①STANDING SEAM METAL PANELS, SKY BLUE

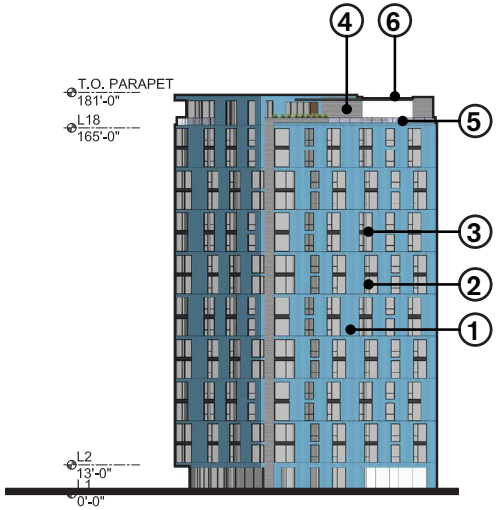
②ALUMINUM WINDOW WALL SYSTEM W/ OPERABLE WINDOWS

③BREAK METAL PANEL, DARK GREY

④HARDIE BOARD SIDING, LIGHT GREY

⑤GLASS GUARDRAIL

⑥CANOPY, EXPOSED STEEL FINISH



BUILDING 10

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SOURCE: Studio One Eleven, 2021

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Figure 3-20
West Site Exterior Building Materials – Viewed from Central Avenue

Building 2 (up to 44 stories) would be the tallest building on the Project Site, and located in the northernmost portion of the Project Site, to continue the Central Los Angeles high-rise development pattern and put the highest density closest to the forthcoming Metro Little Tokyo/Arts District Regional Connector station. The 44-story tower portion of Building 2 would be wrapped in a bush hammered purple concrete shell, with 6 large punched circular openings (each spanning 6 stories in height) positioned vertically up the building on its east and west façades, and surrounded by smaller human-scaled openings for individual units that cover the north and south façades. The tower has a third more solid façade design at its base, with even smaller circular punched openings, shrouding the parking podium on the north, east, and south. The shell's larger openings would offer views toward the Financial District to the west, and mountains to the north and east from recessed balconies that span the two ends of the building. The concrete shell would also extend past the roof, with a scalloped top, protecting the landscaped rooftop amenity. The lower 6-story portion of Building 2, consisting of retail use on the ground level and structured parking on Levels 2-6, would also be wrapped in a bush hammered purple concrete shell, with small circular punched openings on the parking levels to provide screening for parking uses.

Buildings 3 (7 stories) and 4 (12 stories), located at the southeast corner of 4th and Central, are the Project's only 2 buildings that have been designed to be associated architecturally. Both feature a dark grey brick in combination with an exposed steel structure, an aluminum window wall system, a series of murals, and wood panel accents. The south façade of Building 3 and north façade of Building 4 feature terraces cut into the buildings at multiple levels, and are physically connected by sky bridges spanning the passageway below. The terracing continues around both buildings, with extensive landscaping that contrasts the rougher materials of the two buildings. Building 4 additionally has a larger second-level patio, stepping the massing back and connecting to the ground floor activity. While the massing articulation on Building 3 is predominately rectilinear, Building 4 features angled cuts that extend from the street grid.

Building 5 (28 stories) is inspired by the Los Angeles Department of Water and Power (LADWP) John Ferraro building (111 N. Hope St, Los Angeles, CA 90012) but with a modern twist, and serves as a contrast to the industrial nature of the overall Project Site. The façade is almost entirely an aluminum storefront system, with white aluminum metal panels on slab edge, and glass guardrails. While it is primarily a vertical tower, at Level 11, the extending balconies move from the north side of the building to the south side, and from the east side of the building to the west side, appearing to create a subtle shift in the massing. This shift offers more favorable views from the balconies above Level 11, and also responds to the average height of the other buildings on the South Site. The lower portion of the massing also features a recessed bay to the left of center on the west façade, above its ground floor cut-through and aligning with the passageway between Buildings 3 and 4 from Central Avenue. The Building 5 tower would rise above a ground floor industrial shed roof that is intended to facilitate a more human-scale environment. This roof would extend 15-feet into the Central Courtyard to the west providing another layer of ground floor activation. The tower would be additionally topped by a landscaped roof with a trellis canopy.

Building 6 (6 stories), which includes the Project's hotel, would be designed as a modern interpretation of an industrial warehouse that introduces plantings and antique brass elements to soften the industrial materiality. The building would be surrounded by marbleized concrete pillars that decrease in width as they ascend past the roof, and are positioned outside of the individual unit gardens on every level. The units would also feature copper chainmail curtains behind the

landscaping, introducing an additional warmer material. The layered façade would conceal the landscaped courtyard at the buildings center. Finally, the building would feature a large landscaped rooftop deck with a light roof canopy fabric that is visible from all elevations.

Building 7 (10 stories) would be a brick warehouse/loft inspired building reminiscent of the architecture in the Arts District. It would feature gridded steel windows across all elevations with extending wrought iron balconies to the north, east, and west. It would have an L-shaped massing open toward Alameda Street that features a detached trio of industrial sheds clad in vertical corten steel panels to the east along Alameda Street, creating a protected, pedestrian-only Makers Alley, which features boutique shops and passive garden spaces, between the 2-story industrial sheds (3 live/work units) and primary massing. Building 7's base would have a polished concrete finish with a steel storefront system that is draped with vines on its west façade, emulating a boutique retail experience. The building would feature an additional 2-story penthouse that sits atop the primary massing, clad in the same vertical corten steel panels as the industrial sheds and opens out to an activated roof deck to the east.

Building 8 (12 stories) would have a massing that resembles an industrial warehouse. However, it would be modernized through materiality. It would be wrapped in an aluminum window wall system (with operable windows), and framed out in champagne colored aluminum panels. It would feature a curtain wall system at its base, and recessed balconies on its south end (Levels 3 through 8) and north end (Levels 9 through 11) breaking up its symmetry. The building's core would be visible through its glassy façade which would be clad in basalt stone tile – adding a layer of materiality.

Building 9 (27 stories) would be another tower located at the southwest corner of the South Site book-ending the density from the North Site. It would sit atop a 4-level parking podium (with ground floor retail) that would be concealed by a continuous façade. The tower and its base would be wrapped in a white pre-cast concrete frame with subtle asymmetrical extrusions that emulate an enlarged vertical staggered brick pattern. The tower would be setback from the south, creating a large activated deck on Level 5. The massing would be cut into on the north-west and north-east corners providing balconies with views towards downtown (west) and the mountains (east). In addition to the Level 5 deck, Building 9 would also feature an activated rooftop with a residential amenity room with various amenities, and landscaping.

Building 10 (18 stories) would sit on the smallest portion of the Project Site, the West Site. Its massing would consist of two box forms in the facade, one shifted up on the south end and the other shifted down on the north. There would be an outdoor deck on the rooftop and a glass entrance on the ground level. The windows would be offset on every other level. Building 10 would be clad in a blue standing seam metal panel, introducing another color that contrasts the materiality of the South Site, reinforcing the eclectic nature of the Arts District in a modern design style.

Landscaping and Open Space

As shown in Figure 3-10, above, the Project would provide approximately 90,113 sf of publicly accessible open space, consisting of plazas and paseos passing between Central Avenue and Alameda Street and a Central Courtyard in the South Site. Amenities provided throughout the open space area would include trees, landscape, dining patios, raised planters, wood benches, umbrellas, cabanas, decking, artificial and natural turf, and a broad range of paver types (circular, pebble, concrete, etc.). There are a total of 12 individually curated publicly accessible open space areas, which are identified in **Table 3-3**, *Publicly Accessible Open Space Program Summary*.

Table 3-3
Publicly Accessible Open Space Program Summary

Open Space Location	Name of Open Space	Area of Open Space	Uses
1. North and South Sites	4th Street Plazas	10,176 sf	Visual connection across 4th Street, cohesive landscape, bike mobility hub.
2. South Site	Flex Alley	6,564 sf	Invites people into central core, activated edges, landscaping, art as focal element
3. South Site	4th Street Green	5,485 sf	Lush landscaping, turf, entrance park from the street, loose seating along edges, visual connection to the North Site
4. South Site	Central Courtyard	15,929 sf	Primary pedestrian throughway from north to south through the South Site, large art installation, linear tree canopy, outdoor dining along edges,
5. South Site	Residential Paseo	2,429 sf	Green Space, neighborhood feel
6. South Site	Mews	7,217 sf	Pedestrian throughway along both sides of the drive aisle, with pavement coordinated with internal driveway, wide sidewalk, bollards, pedestrian pole lights, zero curbs, uniform street trees, visual connection to the West Site
8. South Site	Fashion Plaza	7,712 sf	Boutique shop displays, passive gardens, high-end feel.
9. South Site	Makers Alley	3,381 sf	Artisans' work stations with flexible furniture boutique shop displays, passive gardens
10. South Site	Flex Alley	12,769 sf	Linear plaza, moveable furniture, coordinated planting along edges
11. South Site	Pop-Up Plaza	8,675 sf	Open-air artisan market, boutique shop displays, movable furniture, overhead art
12. South Site	5th Street Pocket Park	4,791 sf	Passive gardens, workout space (e.g., yoga), dog park, south edge portal to West Site
13. South Site	5th Street Corridor	4,985 sf	South pedestrian connection to the Project Site, street to street pedestrian access,
Total Area		**90,113 sf**	

NOTE: Open Space Location 7 on Figure 3-10 is private open space associated with the hotel courtyard and is, thus, not included as publicly accessible open space or included in this table.

SOURCE: Studio One Eleven, 2022, with locations corresponding to Figure 3-10 of this Initial Study.

The 4th Street Plazas would provide publicly accessible open space on North and South Sites. They would feature cohesive hardscape, seating and bike racks, as well as provide visual and physical entrances into the publicly accessed interiors of the North and South Sites. Out of the total 10,176 sf of 4th Street Plazas, the North Site would provide a total of approximately 8,967 sf of publicly accessible open space. The South Site portion of the 4th Street Plazas would provide a total of approximately 1,209 sf of publicly accessible open space.

As also shown in Figure 3-10, numerous publicly accessible open space areas would be located throughout the South Site in addition to the 4th Street Plaza. The South Site would have a total of 81,146 sf of publicly accessible open space. There would be three east-west paseos between Central Avenue and Alameda Street. In addition, there would be access to the publicly accessible open space areas via 4th Street (4th Street Green) and from the south boundary of the South Site, referred to as the 5th Street Corridor. The 5th Street Corridor would be a publicly

accessible pedestrian connection, providing an additional future linkage between Alameda Street and Central Avenue.

As shown on Figure 3-10, the South Site would feature three centrally located public open space areas, referred to as the Central Courtyard, Fashion Plaza and Pop-Up Plaza. The 15,929 sf Central Courtyard would feature a strong linear tree canopy, outdoor dining on its edges, and large art installations. The 7,712 sf Fashion Plaza would feature boutique shop displays and passive gardens. The Pop-Up Plaza (8,675 sf) would feature an open-air artisan market, boutique shop displays, moveable flexible furniture and overhead art.

On the northern portion of the South Site, the 4th Street Green (5,485 sf), located midblock along 4th Street, would be planted with lawn and other greenery, provide moveable seating along its edges, and serve as the north portal into the Central Courtyard. In the northern portion of the South Site, a Residential Paseo (2,429 sf) and a Flex Alley (6,564 sf) would provide direct pedestrian access to the Central Courtyard from Alameda Street and Central Avenue, respectively. The Mews (7,217 sf of publicly accessible space), which provides pedestrian access along the internal drive aisle, would connect Alameda Street and Central Avenue, and provides direct access to the Central Courtyard and Fashion Plaza. The Mews would incorporate bollards and pedestrian pole lights for pedestrian safety, install uniform street trees, and would feature zero curbs, unified pavement for pedestrians and vehicles, and exhibit a strong pedestrian connection to the West Site, across Central Avenue. There would be another Flex Alley (12,769 sf) providing a direct pedestrian-only connection from both Central Avenue and Alameda Street to the Pop-Up Plaza, and would also include movable flexible furniture with landscaped edges.

Other publicly accessible open space areas on the South Site include Makers Alley and the 5th Street Pocket Park. Makers Alley would be an approximately 3,381 sf area located off Alameda Street adjacent to Building 7. This “L” shaped space would provide boutique shops, passive gardens and work stations with flexible furniture. The 5th Street Pocket Park would provide passive gardens, and outdoor fitness space. The 5th Street Pocket Park would provide access to the interior of the South Site via the 5th Street Corridor.

The South Site would also feature a large courtyard within Building 6 (residential and hotel building). However, this space would be for private use for Building 6’s residents and hotel guests and is not included as publicly accessible open space. No publicly accessible open space would be provided on the West Site.

The Project’s residential open space and amenity features would include rooftop terraces, community gardens, swimming pools, spa areas, common areas with BBQs, kitchen spaces and outdoor seating, meditation and quiet areas, game rooms, a dog walk, plazas, and parks. Private and common open space as required by the LAMC for use by the Project’s residents is summarized in **Table 3-4**, *Code Required and Provided Open Space for On-Site Residential Uses*. As shown in Table 3-4, open space, minimum landscaped areas required for outdoor open space, and a certain number of trees is required for the residential uses. The residential uses would require a total of 163,325 sf of open space (including private and common open space) and would provide 163,325 sf of common and private open space. Of this, approximately 105,218 sf would be outdoor and rooftop common open space, approximately 25 percent of which must be landscaped. The Project would provide a minimum of 26,305 sf of landscaped open space (25 percent), thus meeting the Code requirement.

Table 3-4
Code Required and Provided Open Space for On-Site Residential Uses

	Code-Required Open Space[a]	Required Trees[b]	Open Space Provided[c]	Minimum Landscape Provided per Code	Trees Provided
Building 2	50,825 sf (74 studio, 222 1-BR, 111 2-BR, 42 3-BR)	113	- Common Outdoor (Level 1): 5,183 sf - Common Outdoor (Rooftop Level 7 of Building 1 & 2): 18,595 sf - Common Outdoor (Rooftop Level 44 of Building 2): 13,730 sf - Recreation Room (Level 6 of Building 1): 5,257 sf (Max. 25% of required open space) - Residential Lobby (Level 1 and 44 of Building 2: 1,078 sf (Max. 25% of required open space) - Recreation Room (Level 44 of Building 2): 2,307 sf (Max. 25% of required open space) - Private Open Space (Balconies): 4,675 sf (Max. 50 sf/unit) **Total Building 2: 50,825 sf**	9,377 sf	6 trees
Building 5	45,000 sf (183 Studio, 142 1-BR, 100 2-BR)	107 trees	- Common Outdoor (Level 1): 12,522 sf - Common Outdoor (Rooftop Level 28): 13,298 sf - Residential Lobby (Level 1 of Building 5): 1,700 sf (Max. 25% of required open space) - Recreation Room (Level 2 of Building 5): 4,934 sf (Max. 25% of required open space) - Recreation Room (Level 28 of Building 5): 600 sf (Max. 25% of required open space) - Private Open Space (Balconies): 18,700 sf (Max. 50 sf/unit) **Total Building 5: 51,754 sf**	6,455 sf	74 trees
Building 6	7,400 sf (44 1-BR, 24 2-BR)	17 trees	Common Outdoor (Rooftop Level 6 of Building 6): 7,400 sf **Total Building 6: 7,400 sf**	1,850 sf	73 trees
Building 7	12,850 sf (35 Studio, 4 L/W units, 62 1-BR, 22 2-BR)	31 trees	- Common Outdoor (Level 1): 3,332 sf - Common Outdoor (Rooftop Level 9 of Building 7): 4,607 sf - Residential Lobby (Level 1 of Building 7): 1,816 sf (Max. 25% of required open space) - Recreation Room (Level 9 of Building 7): 721 sf (Max. 25% of required open space) - Private Open Space (Balconies): 2,374 sf (Max. 50 sf/unit) **Total Building 7: 12,850 sf**	1,985 sf	32 trees

Table 3-4
Code Required and Provided Open Space for On-Site Residential Uses

	Code-Required Open Space[a]	Required Trees[b]	Open Space Provided[c]	Minimum Landscape Provided per Code	Trees Provided
Building 9	32,050 sf (88 Studio, 4 L/W units, 186 1-BR, 34 2-BR)	78 trees	- Common Outdoor (Rooftop Level 5 of Building 9): 10,814 sf - Common Outdoor (Rooftop Level 27 of Building 9): 10,229 sf - Residential Lobby (Level 1 of Building 9): 3,887 sf (Max. 25% of required open space) - Recreation Room (Level 27 of Building 9): 600 sf (Max. 25% of required open space) - Private Open Space (Balconies): 6,520 sf (Max. 50 sf/unit) **Total Building 9: 32,050 sf**	5,261 sf	64 trees
Building 10	15,200 sf (48 Studio, 64 1-BR, 32 2-BR)	36 trees	- Common Outdoor (Rooftop Level 18 of Building 10): 5,508 sf - Residential Lobby (Level 1 of Building 10): 800 sf (Max. 25% of required open space) - Recreation Room (Level 18 of Building 10): 2,138 sf (Max. 25% of required open space) **Total Building 10: 8,446 sf**	1,377 sf	40 trees
Total Residential Open Space	**63,325 sf**		**Common Outdoor: 105,218 sf** **Recreation Rooms: 25,838 sf (16%)[d]** **Private Open Space (Balconies): 32,269 sf (20%)** **Total Provided Residential Open Space: 163,325 sf**	**26,305 sf**	
Other Trees throughout Project Site					93 trees
Subtotal Trees					*382 trees*
Replacement of Removed Street Trees		20 trees at 2:1 replacement = 40			40 trees
Total Trees Required for Project Site		**408 trees**			**408 trees provided**
Publicly Accessible (Common) Open Space Provided			North Site: 8,967 sf South Site: 81,146 sf Total Publicly Accessible Open Space: 90,113 sf		

[a] LAMC Section 12.21 G requires the following usable open space per dwelling unit: 100 sf for each unit having less than three habitable rooms; 125 sf for each unit having three habitable rooms; and 175 sf for each unit having more than three habitable rooms. For the Project, Studio and 1-bedroom units would require 100 sf of open space, 2-bedroom units would require 125 sf of open space and 3-bedroom units would require 175 sf of open space.
[b] The Project is required to provide one tree for every four dwelling units, pursuant to LAMC Section 12.21 G.
[c] Open space may include private residential open space, such as balconies; common open space such as swimming pools and spas; and common open space that is accessible to the public.
[d] Recreation rooms cannot count for more than 25 percent of the required common open space per LAMC Section 12.21 G 2(a)(4)(i).

SOURCE: Studio One Eleven, February 2022.

The residential uses would generate a requirement of 382 trees to be provided within the Project Site. In addition, the existing 20 street trees to be removed during Project construction would be required to be replaced at a 2:1 ratio for a total of 40 replacement trees. Overall, the total tree planting for the Project would require 408 new trees which the Project would provide. Tree placement is illustrated in **Figure 3-21**, *Overall Tree Planting Plan*.

Existing above-grade utilities at the intersection of Central Avenue and 4th Street, and along the south side of 4th Street and west side of Alameda Street adjacent to the Project Site would be relocated underground.

Access, Circulation, and Parking

Four streets, including 4th Street, Central Avenue, Alameda Street, and Gladys Avenue, are located adjacent to the Project Site. Central Avenue and Alameda Street are designated as Avenue I in the City of Los Angeles 2035 Mobility Plan (Mobility Plan). 4th Street is designated as Avenue II, and Gladys Avenue is designated as a Local Street under the Mobility Plan. The Mobility Plan requires a right-of-way of 100 feet and a roadway width of 70 feet for the Avenue I designation; a right-of-way of 86 feet and a roadway width of 56 feet for the Avenue II designation, and a right-of-way of 60 feet and a roadway of 36 feet for local streets. In order to meet the requirements of the Mobility Plan, the Project anticipates that additional street dedications, including 6 feet along the south side of 4th Street adjacent to the Project Site and 10 feet along the west side of Alameda Street would be required. No additional dedications would be required along Central Avenue or Gladys Avenue.

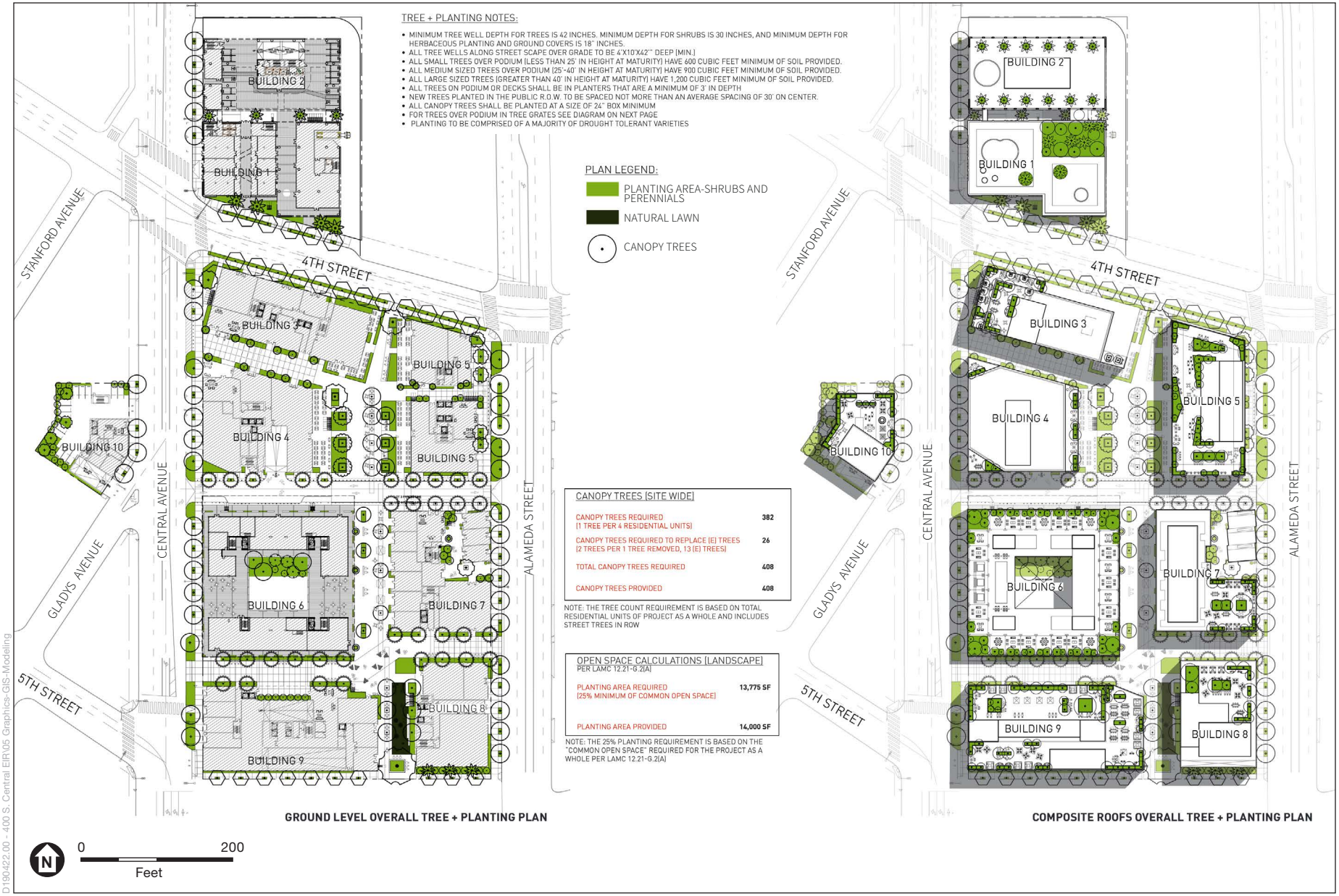
Vehicle Access

Vehicle access to the North Site would be provided via driveways along Central Avenue at the northwest corner of the North Site, and 4th Street at the southeast corner of the North Site. An approximately 29-foot-wide internal drive aisle would connect the two driveways and would also provide access to the structured parking and subterranean levels at Building 2 along the north side of the North Site. Loading docks and delivery truck access from the internal drive aisle would also be located at Building 2, at the east side of the North Site. Access driveway locations and dimensions are illustrated above in Figures 3-7 and Figure 3-8, respectively.

Vehicle access to the South Site would be provided via one driveway along Alameda Street and two driveways along Central Avenue. The northerly Central Avenue driveway and Alameda Street driveway would be connected by an internal east-west drive aisle. The internal drive aisle would provide access to the subterranean parking structure at Building 4. The southerly driveway along Central Avenue would provide access to the structured parking and subterranean levels at Building 9. The driveway locations are illustrated in Figure 3-7.

Pedestrian Access

A designated passenger drop-off area would be located adjacent to Building 5 along Alameda Street. Passenger loading and unloading areas would also be adjacent to Buildings 3 and 4 along Central Avenue and adjacent to Building 6 on the interior drive aisle.



SOURCE: Studio One Eleven, 2021

Fourth & Central Project

Figure 3-21
Overall Tree Planting Plan

As shown above in Figure 3-7 and Figure 3-10, pedestrian circulation would include several pedestrian passages open to the sky that would provide a continuous pedestrian connection throughout the Project Site. These include the 4th Street Plazas; the two Flex Alleys; the 4th Street Green; the Central Courtyard; the block-to-block sidewalks that comprise the Mews; and the 5th Street Pocket Park. The public sidewalks along Central Avenue, 4th Street, Alameda Avenue, and Gladys Avenue would be removed and replaced with upgraded and tree lined sidewalks. Public sidewalks would be approximately 15 feet in width (varying from 10 to 16 feet) along the Project's street frontages. Pedestrian crosswalks at the intersections of Alameda Street and 4th Street, 4th Street and Central Avenue, and at the corner of 5th Street and Central Avenue would be maintained and provide connections between the North, South and West Sites.

Vehicle Parking

Vehicle parking to serve each of the buildings would be provided in several locations throughout the Project Site. Parking for the North Site would be provided within Building 2, in a 4-level subterranean structure and six levels above grade. The South Site includes a 3-level subterranean structure that runs underneath the entire South Site. Building 9 also includes 4 levels of above grade structured parking. Parking for Building 10 on the West Site is located within a 1-level subterranean structure and surface parking.

Cross sections of parking structures as viewed from Central Avenue for Buildings 1, 2, 3, 4, 6, and 9 are provided in Figure 3-11. Cross sections of parking structures as viewed from Alameda Street for Buildings 5, 7, and 8, are shown in Figure 3-12. Cross sections of parking structures as viewed from Alameda Street for Buildings 4, 5, and 10 are shown in Figure 3-12.

The Project Site is located within the Los Angeles State Enterprise Zone, which permits general commercial uses to provide two (2) parking spaces per 1,000 sf of gross commercial floor area. (LAMC Section 12.21 A.4(x).) The Project Site is also part of the Central City Parking District, which governs the Project's residential and hotel parking requirements. (LAMC Section 12.21 A.4(p).) The parking requirement for residential projects in the Central City Parking District is one space for each dwelling unit with three or fewer habitable rooms and 1.25 spaces for units with more than three habitable rooms. (LAMC Section 12.21 A.4(p).) Parking requirements for hotels within the Central City Parking District are as follows: one space for each two individual guest rooms for the first 20 rooms, one additional parking space for each four guest rooms in excess of 20 but not exceeding 40 rooms, and one additional parking space for each six guest rooms in excess of 40 rooms. (LAMC Section 12.21 A.4(p).)

The Project's vehicular parking requirement under the LAMC is 2,658 spaces. However, pursuant to LAMC Section 12.21 A.4, the Project will replace required vehicular parking spaces with bicycle parking spaces, which reduces the total vehicular parking requirement to 2,474 spaces. The Project would provide a total of approximately 2,475 vehicle spaces and 742 bicycle spaces, thus, meeting LAMC parking requirements. The parking calculations for the Project's various uses are provided in **Table 3-5**, *Vehicular Parking*.

Pursuant to the City's Electric Vehicle Parking Ordinance, 30% of the Project's total parking spaces will be designated as Electric Vehicle (EV) spaces capable of supporting future electric vehicle supply equipment (EVSE) and 10% of the total number of spaces will be Electric Vehicle Charging Stations (EVCS) (Ordinance No. 186,485).

Table 3-5
Vehicular Parking

Use	Rate Per LAMC	Required
Residential[1] (1,521 units: 1,156 du with 3 or less habitable rooms, 365 du with greater than 3 habitable rooms)	1 space per unit with 3 or less habitable rooms; 1.25 space per unit with more than 3 habitable rooms	1,612 spaces
Retail[2] (101,088 sf)	2 spaces per 1,000 sf	203 spaces
Office[2] (411,113 sf)	2 spaces per 1,000 sf	823 spaces
Hotel[3] (68 guest rooms)	First 20 rooms – 1 space per 2 guest rooms Next 20 rooms – 1 space per 4 guest rooms Remaining rooms – 1 space per 6 guest rooms	20 spaces
Total Project Requirements		**2,658 spaces**
Bicycle Parking Reduction Bicycle Spaces Vehicle Space Reduction *Residential (8%) 501 spaces (125 spaces)* *Hotel (15%) 12 spaces (3 spaces)* *Non-Residential (5%) 224 spaces (56 spaces)*		
Total Project Requirement with Bicycle Parking Reduction		**2,474 spaces**

1 LAMC Section 12.21 A.4(p)
2 LAMC Section 12.21 A.4(x)
3 LAMC Section 12.21 A.4(p)

SOURCE: Studio One Eleven, 2022.

The Project will include approximately 742 bicycle parking spaces, as required by LAMC Section 12.21 A.16(a)(2). Approximately 146 of the total spaces will be short-term spaces, with the remaining 596 spaces designated as long-term bicycle parking spaces. The Project's bicycle parking spaces and facilities will be provided at various locations throughout the Project Site, which include lockers, fix-it/repair stations and showers.

Lighting and Signage

Portions of the Project at or above the highest occupied floor would incorporate architectural accent lighting to emphasize the Project's architectural identity as part of the skyline and may be backlit. Exterior architectural accent lighting on all buildings would be utilized to enhance the perception of each building's architectural character and create visual interest along the streets and public spaces from which they are visible; as well as to reinforce the composition created by the buildings on the North, South and West Sites.

All architectural lighting would be configured with timer or photo-sensors to automatically turn on at dusk and turn off at dawn. The architectural accent lighting would have the ability to be lit in a variety of colors, which may be used to celebrate holidays or days of cultural significance. The Project would observe no more than 60 such days per calendar year to utilize the colored architectural accent lighting. None of the proposed architectural accent lighting would include any moving lights or dynamic lighting effects. All proposed lighting would be steady in intensity and color throughout a single night. No still or moving images would be projected onto the buildings.

Pedestrian and publicly accessible areas would be well-lit for security. Project lighting would also include ground level commercial lighting, common and private open area lighting, interior and outdoor lighting from commercial and residential areas, and accent lighting. Light fixtures would share a consistent design aesthetic and would be configured to minimize light pollution. Additionally, light fixtures on the Project Site would be shielded and directed toward the areas to be lit and away from adjacent properties. Furthermore, the Project would comply with LAMC regulations pertinent to light intensity and glare.

Project signage would include building identification, wayfinding, and security markings. Commercial and residential signage would be similar to other typical mixed-use projects, signage in the Project vicinity. All proposed signage would conform to the size, type, and placement requirements of LAMC Article 4.4 Sign Regulations. No off-site signage is proposed.

Site Security

The Project would incorporate a security program to ensure the safety of its residents and visitors. Design strategies within the Project design would include, but not be limited to, the following:

- Secure access points would be limited and located in areas of high visibility;
- Hallways and corridors would be straight forward with no dark corners, as possible;
- Outdoor areas would be exposed to windows and allow for natural surveillance;
- Clear transitional zones would be provided between public, semi-public and private spaces;
- Access key cards and cameras would be used, as necessary; and
- Interior and exterior spaces would be well lit with proper signage to direct the flow of people and decrease opportunities for crime.

In addition, the following security measures would be implemented by the Project:

- Installing and utilizing a security camera network throughout the Project Site.
- Controlled access to all building elevators, residences, and resident-only common areas through electronic access control equipment specific to each user, as possible.
- Training employees on appropriate security policies for the Project's buildings. Duties of the staff would include, but would not be limited to, assisting residents and visitors with site access, monitoring entrances and exits of buildings, managing and monitoring fire/life/safety systems, and monitoring the Project Site.
- Providing a security program for the ground level open space areas.
- Access to commercial uses would be unrestricted during business hours, with public access discontinued after businesses, such as retail and restaurant uses, have closed.

Fire Protection

The Project would comply with the applicable requirements of the National Fire Protection Association (NFPA), Federal Occupational Safety and Health Administrations (OSHA) and California OSHA (Cal/OSHA), California Building Code, California and City of Los Angeles Fire Code, and other LAMC and Los Angeles Fire Department (LAFD) requirements, including, where required by code: the provision of fire resistant doors, materials, walkways, stairwells, and

elevator systems (including emergency, gurney accessible and fire control elevators); installation of a fire sprinkler suppression system, smoke detectors, signage, fire alarms, building emergency communication systems, smoke control systems; implementation of an Emergency Safety Plan; and compliance with LAFD fire apparatus and personnel access requirements. Compliance with applicable building and fire/life safety 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.

Special Events and Outdoor Activities

Special events, such as resident and employee gatherings, art shows, and other community events could potentially be held within the Project buildings or outdoor open space areas. Such events would typically be restricted to daytime and evening (before midnight) hours. Special events, depending on size and type, may be subject to City special event permits, event management plans, and applicable LAMC noise requirements. The centralized linear plaza allows flexibility for potential events within the different spaces. The events would primarily consist of small acoustic musical performances, and outdoor fitness classes. When special events occur within these spaces, they would be subject to applicable noise requirements established by the LAMC. Janitorial services would be performed regularly each day to ensure proper maintenance of the plaza for the enjoyment of residents and visitors.

Sustainability

At the minimum, the Project's buildings will be designed to meet the standards for United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Certification through proven and effective design strategies. The Project may seek certification as an Environmental Leadership Development Project (ELDP) under the Jobs and Economic Improvement Through Environmental Leadership Act (PRC, § 21178 et seq.). Sustainable elements that have been included into the Project are described below.

The Project Site's urban location enables the Project to earn LEED *Location and Transportation* credits related to public transit, bike usage, and EV charging stations. The Project Site would be readily accessible by several public transit options including numerous City bus lines and rail at Metro's Regional Connector Little Tokyo/Arts District station that is currently under construction and scheduled to be open and operational in 2022. A transportation demand management (TDM) program would be implemented to reduce the Project's single occupant vehicle trips and increase the trips arriving via alternative modes of transportation (e.g., walking, bicycle, carpool, vanpool, and transit). The TDM program would include design features, transportation services, education, and incentives intended to reduce the amount of single occupant vehicles during commuter peak hours.

Additionally, the Project would comply with the City's Electric Vehicle Parking Ordinance, which requires 30 percent of the Project's total parking spaces to be designated as EV spaces capable of supporting future EVSE, and 10 percent of the total number of spaces to be EVCS (Ordinance No. 186,485). Further, the Project is required to provide on-site short and long-term bicycle parking in various areas with consideration of its integration throughout the Project and surrounding roadway network.

The Project would incorporate water conservation and rainwater management strategies such as low flow/efficient water fixtures, rainwater capture systems, drought-tolerant/California native plant species selection, landscape contouring to minimize precipitation runoff, irrigation system efficiency, smart irrigation systems (e.g., weather-based controls), and water-saving pool equipment.

The Project will investigate the use of local low-carbon materials and Environmental Product Declaration (EPDs) to promote the City's green-material economy by using the "Buy Clean California Act" (AB 262) as a reference and resource.

The Project will use tree landscaping via passive solar shading and use cool roof/pavement coatings to reduce the urban heat island effect. The Project would also comply with applicable solar installation regulatory requirements. The Project will focus on occupant wellness by incorporating healthy materials with low-volatile organic compounds (VOCs), abundant daylight, superior interior lighting quality, and accessible thermal comfort control to prevent sick building syndrome. Other building features would include such items as installation of energy-efficient heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants; and dedicated on-site recycling areas. The Project will also incorporate indoor air quality best practices to provide clean ventilation for improved breathing, as well as COVID-response health and safety measures.

Construction

Project construction is anticipated to commence as early as 2025 and is estimated to be completed within approximately 5 years. Construction activities within the North, South and West Sites would be phased to meet market demand and/or to maximize construction efficiency. As part of the Project construction activities, all on-site buildings and associated infrastructure (i.e., surface parking, sidewalks, landscaping, etc.) would be removed on the South and West Site. On the North Site, a portion of the existing six-story cold storage building at 715 4th Street is intended to be adaptively reused, if feasible, to provide new restaurant/retail uses and residential amenities (see Figure 3-3 for portion of warehouse to be reused, if feasible). The remainder of the six-story warehouse and the existing 1-story warehouse building component on the North Site would be demolished during Project construction activities. If it is not feasible to adaptively reuse a portion of the existing six-story cold storage building at 715 E. 4th Street, the building would be demolished in its entirety.

Due to the overall size of the Project Site being over 7 acres and the phased construction, there will be opportunities in the early phases of construction to utilize on-site areas for construction staging, laydown of equipment and materials and construction worker parking. As the Project becomes more built out, there will be more opportunities to provide worker parking in the newly constructed on-site parking, but staging and laydown areas will be more limited. Throughout construction, and in particular during the later phases a combination of adjacent right–of-way and use of neighboring properties through private agreements may be utilized for these purposes. Lane closures and sidewalk closures will be phased throughout construction to provide access around the Project Site, ongoing pedestrian access throughout the neighborhood and to access areas under construction. With the buildings planned to be constructed up to the adjacent right-of-way lines, the need for sidewalk and lane closures will exist concurrent with construction of each building. OSHA compliant pedestrian canopies would be provided where appropriate and necessary.

Overall, construction would include up to approximately 651,000 cubic yards (CY) of grading (cut), including 105,000 CY within the North Site, 534,000 CY in the South Site and 12,000 CY in the West Site, all of which would be exported from the Project Site, with excavations depths to approximately 57 feet below the ground surface (bgs) for the lowest foundations and approximately 64 bgs in isolated areas for elevator pits.

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

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The EIR 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:

- **General Plan Amendment** pursuant to LAMC Section 11.5.6 A to re-designate the underlying land use from Light Industrial to Regional Commercial.
- **Vesting Zone Change and Height District Change** pursuant to LAMC Sections 12.32 F, 12.32 H, and 12.32 Q, to change the zone from M2-2D/M2-2D-O to C2-2, which involves removing the D Development Limitation.
- **Affordable Housing Development Incentives under Measure JJJ** to allow the following incentives:
    a. FAR increase to 6.95:1;
    b. Averaging of FAR, parking, and open space across the Project Site; and
    c. A third incentive to be determined by Applicant pursuant to Government Code, Section 65915(k), and LAMC Section 12.22 A.25.
- **Main Conditional Use Permit** pursuant to LAMC Section 12.24 W.1 to permit the sale and dispensing of alcoholic beverages for on-site and/or off-site consumption.
- **Site Plan Review** pursuant to LAMC Section 16.05 for approval of development of a project which creates 50,000 gross sf or more of nonresidential floor area and creates 50 or more dwelling units.
- **Vesting Tentative Tract Map** pursuant to LAMC Section 17.15 to merge 35 existing lots and re-subdivide into four (4) ground lots and 26 air space lots for commercial and residential purposes, and a Haul Route.
- **Development Agreement** approval pursuant to Government Code Sections 65864 et seq.

In addition to the entitlements identified above, additional approvals will be required for construction and operation of the Project, including, but not limited to approval of permits for the following: demolition, excavation, shoring, grading, foundation, building and interior improvements, improvements within the public right-of-way and the removal of trees on public property.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

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

The related City of Los Angeles Department of City Planning Zoning Information (ZI) No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[3]

PRC Section 21099 and ZI No. 2452 apply to the Project. Therefore, the Project is exempt from aesthetic impacts. The analysis in this initial study (or in the EIR, if any aesthetic impact discussion is included), is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this Initial Study (or the EIR) is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this Initial Study (or the EIR) shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

[3] City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Available at: http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf. Accessed May 3, 2021.

	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. Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact.

Panoramic Views

As described in the City of Los Angeles CEQA Thresholds Guide, 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 usually associated with vantage points looking out over a section of urban or natural area, which provide a geographical orientation not commonly available. Examples of panoramic views might include a unique urban skyline view, valley, mountain range, the ocean, or other water bodies. The cluster of the Project's buildings ranges in height from two stories to 44 stories (approximately 497 feet high). The scenic vistas in the Downtown area consist of views of City Hall and other high-rise buildings in Los Angeles's Civic Center, the Verdugo Hills and San Gabriel Mountains to the north and northeast of Downtown, and the high-rise skylines of the Los Angeles Financial District and Bunker Hill. Because these resources are located to the northwest and west of the Project Site, views from public areas to the north of the Project Site, such as the Los Angeles' civic center parks and open plazas in Little Tokyo, and parks and streets to the west of the Project, such as the St. Julian Park, do not include scenic vistas across the Project Site. Therefore, the Project would have no substantial adverse effect on view fields (line of sight) across the Project Site from the north and west.

However, scenic vistas are potentially available across the Project Site from the south and east. These include views across the Project Site toward the Civic Center and City Hall, which are located approximately 0.68 miles to the north-northwest of the Project Site; views of the high-rise skyline of Bunker Hill, located approximately 0.95 miles to the northwest of the Project Site; views

of the high-rise skyline of the Financial District, located approximately 1.3 miles to the west-northwest, and views of the more distance Verdugo Hills, San Gabriel Mountains, and Hollywood Hills to the north and northwest of the Project Site.

The elevated Santa Ana Freeway (US-101), which would have views of the Civic Center and downtown skyline across the Project Site, is located approximately one mile to the east of the Project Site. From certain points along US-101, the Project has the potential to be in the line of sight between the freeway and the Civic Center, Bunker Hill, and the Financial District. Views across the Project Site from a moving vehicle on the freeway would be intermittent. In addition, because of the approximate one-mile distance between the Project Site and the freeway, the Project would not result in a broad or substantial visual obstruction of the valued view resources (e.g., City Hall, the panoramic skyline, and mountains) in the Project background. As such, the Project would not substantially adversely affect the scenic vista from this location.

Views of the Civic Center and downtown skyline across the Project Site would also be available from the 4th Street bridge, approximately 0.76 miles to the southeast of the Project Site. However, because of the distance between the bridge and the Project Site, the Project would form a small component of the view field and fit into the urban setting. Views across the Project Site from the 1st Street bridge are largely blocked by existing development along the west bank of the Los Angeles River, although the 1st Street bridge is nearer to the Project Site (0.65 miles to the northeast). While the upper stories of the Project buildings may be visible, the view of the skyline to the west would not be adversely affected by the Project.

The nearest parks to the Project Site are Gladys Park, located at 808 E. 6th Street approximately 0.1 mile to the west of the Project Site; the Arts District Park, located at 501 S. Hewitt, approximately 0.2 miles to the east-southeast of the Project Site; the Aliso Pico Park, located 370 S. Clarence Street approximately 0.2 miles to the southwest of the Project Site; the Arts District Dog Park, located at 1004 E. 4th Street approximately 0.3 miles to the east of the Project Site, the San Julian Park, located at 312 E. 5th Street approximately 0.3 miles to the west of the Project Site; and the Pecan Recreation Center, located at 1455 Pecan Street approximately 0.9 miles to the east of the Project Site. Of these, the only parks having a direct line of sight across the Project Site are the Arts District Park and the Arts District Dog Park, located to the east-southeast and the east of the Project Site. At present, the Arts District Park has intermittent views of the Financial District skyline between the existing trees planted along the west border of the park. Although the Project would block the existing high-rise skyline view from the Arts District Park, because of the approximately 1.2-mile distance between the Arts District Park and the Financial District, the high-rise skyline is only a minor component of the view field, and the existing view is interrupted by trees within the west boundary of the park. Thus, the view does not constitute a high quality panorama. It is noted, however, that the ground elevation at the Project Site is approximately 254 feet; whereas, the ground elevation at the visible buildings in the Financial District is approximately 522 feet. Because of the higher elevation at the latter location, some of the taller buildings could still be partially visible above the Project. However, the Project, as with any high-rise cluster, would contribute to the interest of the overall skyline in the park's intermittent (between trees), west-facing view field. As with the view of the Financial District, the view of the Project would also be partially blocked by existing trees within the park. Because of the character of the existing view, the Project would not cause a substantial adverse effect on the existing scenic vista. Scenic vistas across or from the Arts District Dog Park are currently blocked by adjacent buildings and, as such, the Project would not adversely affect views from the latter location.

Focused Views

The Project would feature sidewalks approximately 15-feet-wide (varying from 10 to 16 feet) on streets adjacent to the Project Site, including Central Avenue, Alameda Street, 4th Street, and Gladys. Because of the setbacks of the buildings from the street corridors, the Project's buildings would not impinge on or substantially block any existing views of distant mountains, notable buildings, or skyline through the existing adjacent street corridors. Similarly, during construction, equipment, construction fencing, etc. would generally be located on the Project Site allowing views to be maintained through the existing adjacent street corridors. Any partial view blockage by construction vehicles or equipment within the adjacent street corridors would be intermittent and mostly limited to lower portions of the focused view (near the ground), as opposed to the upper portions of the distant mountains, notable buildings, skyline, etc. throughout construction.

The majority of the Project Site is currently developed and, as such, adjacent or near street views across the Project Site from Central Avenue, Alameda Street, 4th Street, 4th Place, and 5th Street are currently minimal. Although the West Site is an open, surface parking lot, it is surrounded by development and has minimal across-site views from the adjacent Central Avenue and Gladys Avenue.

Based on the above, the construction and operation of the Project would not result in substantial adverse effects on scenic vistas. It is further noted, however, that SB 743 (codified in PRC Section 21099(d)(1)) and ZI File No. 2452) provide that a mixed-use or employment center project in a designated TPA site and infill area such as the Project would result in a less than significant impact with respect to scenic vistas. No further analysis of this topic in an EIR is required.

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

No Impact. A significant impact would occur only where scenic resources within a state scenic highway would be damaged or removed by a project. The Project Site is not located within a state scenic highway.[4] The nearest state designated scenic highway is State Route 2, from I-210 to SR-138, which located approximately 13 miles north of the Project Site. Therefore, the Project would have no impact with respect to damaging scenic resources within a state-designated scenic highway, and no further analysis of this topic in the EIR is required.

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?

Less Than Significant Impact. The Project would not conflict with LAMC regulations that govern scenic quality, such as those applicable to exterior lighting and signage (see Checklist Question d, below), street trees, zoning designation, and applicable policies of the General Plan or Community Plan.

[4] California Department of Transportation (Caltrans), Online State Scenic Highway Map, https://www.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983, accessed June 21, 2021.

The Project Site is zoned M2-2D-O on the North Site and M2-2D on the South and West Sites. This zoning permits a range of industrial uses prevalent in the area such as warehouses and cold storage facilities, and also permits commercial and office uses. The "2D" indicates Height District 2D, which does not limit the height of buildings on these properties, but would limit the FAR to 3:1. The "O" designation indicates that the Project Site is located within an oil drilling district where the drilling of oil wells or the production from wells of oil, gas, or other hydrocarbon substances is permitted. The designation related to visual quality is generally related to building heights. Since the existing zoning designation has no height limitation, the aesthetic character (building heights) of the Project would not conflict with the existing zoning.

General Plan Framework Element

The City of Los Angeles General Plan 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).[5] The Project Site is located in a highly urbanized area and is developed with cold storage facility/warehouse uses and paved surface parking. The Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development by replacing the existing uses with the development of 10 separate yet complementary buildings, reflecting the vibrant and diverse nature of the adjoining Little Tokyo, Arts District, and Downtown Industrial District neighborhoods. Each building would be designed with unique architecture and use programs. However, the proposed buildings would be designed to work in relationship with the overall design and program to complement and support the Project as a whole. The buildings include design references to warehouses and lofts, apartment blocks, industrial sheds, and contemporary infill. The architecture would be modern and scaled to address both the Project and the surrounding buildings. The Project would include varied building materials to reinforce the urbanity of the design and the eclectic nature of the individual buildings. The Project's design strategy is to organize an assemblage of smaller buildings that break down the scale of development to reduce the visual massing impact and emulate the organic urbanism of the neighborhood. This development strategy, in addition to setbacks and varied building articulation, are intended to contribute to a walkable and human-scaled environment.

The Project would also encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character (Policy 5.8.4).[6] Proposed signage would be designed to be aesthetically compatible with the architecture of the Project and the surrounding area. Project signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage that would comply with LAMC signage regulations. The Project would not include signage with flashing or mechanical properties. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

[5] Los Angeles Department of City Planning, The Citywide General Plan Framework: An Element of the City of Los Angeles General Plan, Chapter 5, Urban Form and Neighborhood Design, re-adopted by City Council on August 8, 2001.

[6] Los Angeles Department of City Planning, The Citywide General Plan Framework: An Element of the City of Los Angeles General Plan, Chapter 5, Urban Form and Neighborhood Design, re-adopted by City Council on August 8, 2001.

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.

Central City Community Plan

Chapter V, Urban Design, of the Central City Community Plan sets forth policies related to scenic quality and references in its introduction the policies of the Downtown Design Guide: Design for a Livable Downtown, which was published in 2009. The latter document does not incorporate the geographic area to the east of San Pedro Street and does not include the area currently encompassing the City's Arts District. The Downtown Design Guide, however, supports citywide Urban Design Principles, including: (i) Usable and Accessible Transit; (ii) Walkability and Well Being; (iii) Bridge the Past and the Future; (iv) Accentuate Visual Interest; (v) Nurture Neighborhood Character; (vi) Develop Street Furnishings; (vii) Emphasize Implementation and Maintenance; (viii) Stimulate Sustainability and Innovation; (ix) Improve Equity and Opportunity; and (x) Generate Public Open Space and Support Navigation, Connection and Flow. The Project would be consistent with and support each of these principles. The Project is located within a designated TPA and within walking distance of transit and, as such would support transit and walkability (items i and ii). The Project would further support walkability and wellbeing through the provision of pedestrian amenities including broad sidewalks, street trees, publicly accessible open space, seating, open-air markets, outdoor art installations, plazas, block-to-block pedestrian walkways, and lush landscaping (item ii). The Project would bridge the past and future through the adaptive reuse of a portion of an existing historic structure, which was constructed in the early 1900's, and incorporation of the building into architectural motif of the overall Project (item iii).

The Project would be consistent with policies to accentuate visual interest through the variety of building heights, design, building textures, variation in colors, rooftop gardens, terracing of buildings, and landscaped open spaces and a dense planting program, including 408 trees (item iv).

The Project would be consistent with policies to nurture neighborhood character through sidewalk improvements and planting of uniform street trees (item v). It would provide street furnishings (item vi), it would promote sustainability by providing a high density mixed-use development within a TPA, thus reducing vehicle miles traveled (item viii); it would stimulate innovation through promoting the arts through live/work spaces and innovative architectural character (item viii); and it would improve equity and opportunity through the broad range of housing types (live/work, rental, and purchased homes) and price ranges (item ix), and through the provision of approximately 90,113 sf of publicly accessible open space, cross walks, street to street paseos, the Project would generate public open space and support navigation, connection, and flow (item x).

The Urban Design policies set forth in the Community Plan are tailored to specific districts and do not address the Project Site or the nearby Arts District. The exception is a policy related to Little Tokyo and policies related to open space. The policy specific to Little Tokyo states: "Maintain existing and improve overall pedestrian linkage, including Azusa Street as a Pedestrian Walk, within Little Tokyo, as well as with neighboring districts (e.g., Arts District, industrial areas, Civic Center)."[7] The Project Site is located within 0.4 miles of the Metro L Line Little Tokyo/Arts District Station at 1st Street and Alameda Street to the north of the Project Site. The three blocks of Alameda Street

[7] City of Los Angeles Department of City Planning, Central City Community Plan, January 8, 2003, page V-3.

between the Project Site and the Metro station feature primarily tree-lined sidewalks, marked cross walks, and signalized intersections. In addition, the Project would improve and upgrade sidewalks, including the installation of canopy street trees on Central Avenue, 4th Street, and Alameda Street adjacent to the Project Site, as well as provide pedestrian paseos between Central Avenue and Alameda Street. Sidewalks on Central Avenue, 4th Street, and Alameda Avenue would be approximately 15 feet in width, consistent with the dimensions of developed sidewalks in the area.

The location of the high-density Project in proximity to the Metro Station and the Little Tokyo community, as well as pedestrian improvements within the Project Site, would be consistent with the policy to improve overall pedestrian linkage.

The policy related to open space states that, in addition to the civic-scale open spaces, a network of small and well-distributed public and semi-public open space is recommended to serve the needs of individual districts, neighborhoods, developments and institutions. According to the policy, these "should be distributed at about 5-minute walking distances (0.25 miles) and should vary in size and character according to land availability and use…As city life unfolds, and districts and their occupants change, it is quite common and proper for parks to be 'recreated' at intervals to accommodate new needs."[8] The Project would be consistent with this policy in that it would provide 90,113 sf of publicly accessible open space that would include pocket parks, plazas, a large Central Courtyard, and pedestrian paseos (street to street, open-air pedestrian passages). These areas would be landscaped with grass, trees, raised flower beds, public art, wooden benches, other flexible seating, and special paving to meet the needs of the neighboring Arts District's growing residential population and visitors.

Overall, relative to scenic quality, the Project design would be generally consistent with the applicable policies set forth in the Central City Community Plan.

Citywide Urban Design Guidelines

The Citywide Design Guidelines, adopted October 24, 2019, establishes ten guidelines to carry out the common design objectives that 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. The Project would not conflict with the Citywide Design Guidelines, as discussed below.

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

The Project would enhance the streetscape adjacent to the Project Site by implementing a design that would enhance the pedestrian experience. Specifically, the Project's ground floor open space areas and pedestrian pathways would be designed to be highly visually permeable, thereby activating the streetscape. In addition, the Project would also install landscaping, including new street trees as well as providing walkways; outdoor dining seating; and raised planters, further activating the streetscape and improving the pedestrian experience. In addition, the Project would include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night. Overall, these Project elements would promote a safe, comfortable, and accessible pedestrian experience for all.

[8] City of Los Angeles Department of City Planning, Central City Community Plan, January 8, 2003, page V-6.

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

Vehicle access to the North Site would be provided via driveways along Central Avenue at the northwest corner of the North Site and 4th Street at the southeast corner of the North Site. Vehicle access to the South Site would be provided via one driveway along Alameda Street and two driveways along Central Avenue. Vehicle access to the West Site would be provided via driveways along Central Avenue and Gladys Avenue. 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. Furthermore, the Project would install landscaping, including new street trees and raised planters as well as providing outdoor dining seating, further activating the streetscape and improving the pedestrian experience.

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

The Project would activate the ground floor along all of Project's street frontages including Alameda Street, 4th Street, Central Avenue and Gladys Avenue through the provision of pedestrian amenities including broad sidewalks, street trees, publicly accessible open space, seating, open-air markets, outdoor art installations, plazas, block-to-block pedestrian walkways, and lush landscaping. Overall, the Project would be designed to actively engage with streets and public space and maintain human scale.

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

The Project Site is in a highly urbanized area and situated on the eastern border of the Central City East District, which is largely developed with general commercial and manufacturing uses such as wholesale, warehouse, and food processing facilities. Alameda Street, which borders the Project Site to the east, separates the Central City East District and the Arts District. Thus, the Project Site is located adjacent to the Arts District, which is an emerging neighborhood in the City's Downtown area and has experienced an increased demand for new retail, hotel, creative office, and residential spaces. The Project Site is also situated just south of the Little Tokyo neighborhood, where numerous former warehouse structures are being converted to artists' workshops, live-work spaces, and neighborhood-serving retail and commercial uses.

As discussed under the General Plan Framework subsection above, the Project would be designed to complement the varying design elements of the uses surrounding the Project Site. The architecture would be modern and scaled to address both the Project and the surrounding uses.

Guideline 5: Express a clear and coherent architectural idea

The Project's proposed buildings would be designed to complement adjacent structures and uses, including references to warehouses and lofts, apartment blocks, industrial sheds, and contemporary infill. The architecture would be modern and scaled to address both the Project and the surrounding buildings. The Project would include varied building materials to reinforce the urbanity of the design and the eclectic nature of the individual buildings. Subsection 3.3.5, Architecture and Design, in Chapter 3, Project Description, provides detailed overview of each Project building and discussed the architecture and design of the Project. Overall, relative to the surrounding development, the Project design would complement the varying design elements of the uses adjacent to the Project Site.

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

As previously discussed, the Project would enhance the streetscape adjacent to the Project Site through the provision of community and pedestrian amenities including broad sidewalks, street trees, publicly accessible open space, seating, open-air markets, outdoor art installations, plazas, block-to-block pedestrian walkways, and lush landscaping. In addition, the Project would include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night.

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

A designated passenger drop-off area would be located adjacent to Building 5 along Alameda Street. Passenger loading and unloading areas would also be adjacent to Building 3 along Central Avenue and adjacent to Building 6 on the interior drive aisle. The designated drop-off areas would promote safe and convenient access for Project Site users.

Pedestrian passages open to the sky would provide a continued pedestrian connection throughout the Project Site. These include the 4th Street Plazas; the two Flex Alleys; the 4th Street Green; the Central Courtyard; the block-to-block sidewalks that comprise the Mews (these have the same pavement as the roadway, but are not part of the roadway); and the 5th Street Pocket Park. The public sidewalks along Central Avenue, 4th Street, Alameda Avenue, and Gladys Avenue would be removed and replaced with upgraded and tree lined sidewalks. Public sidewalks would be approximately 15 feet in width (varying from 10 to 16 feet) along the Project's street frontages. Pedestrian crosswalks at the intersections of Alameda Street and 4th Street, 4th Street and Central Avenue, and at the corner of 5th Street and Central Avenue would be maintained and provide connections between the North, South and West Sites. All pedestrian facilities and driveways would be designed to meet applicable LAMC requirements, as well as LAFD access requirements and applicable LAFD regulations regarding safety.

The Project would also include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into the buildings.

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

The Project Site is located in an urbanized area and is currently developed with cold storage facility/warehouse uses and paved surface parking. Landscaping within the Project Site includes 20 fern pine street trees located adjacent to the Project Site. As discussed further below, none of the trees within the Project Site and in the adjacent public right-of-way are considered protected by the City. However, all of the fern pines would be removed to support development of the Project. Currently, the City's Urban Forestry Department requires a 2 to 1 street tree replacement ratio, which the Project would comply with.

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 3, Project Description, of this Initial Study, the Project would be designed and constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards

would reduce energy and water usage and waste and, thereby, reducing associated greenhouse gas emissions and minimizing the impact on natural resources and infrastructure.

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

The Project would manage stormwater through a capture and use system. A capture and use system would capture stormwater runoff and surface drains for feeding new landscaped areas around the Project Site.

Overall, as discussed above, the Project would be consistent with zoning and regulations that govern scenic quality. Impacts would be less than significant and no further evaluation of this topic in the EIR is required.

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

Less Than Significant Impact. The Project Site is located within an urbanized area of the City characterized by moderate to high ambient nighttime artificial light levels, although some of the more wholly industrial areas are characterized by lower ambient light levels. At night, the more urbanized areas within the Central City generate moderate to high levels of exterior lighting for security, parking, signage, and architectural lighting. Street lights and the nighttime vehicle traffic on local streets also contribute to the light levels in the area. The Project would further contribute to ambient nighttime illumination during both construction and operation of the Project.

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 proposed Project construction. Further, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. In addition, construction lighting, while potentially bright, would be highly focused on the particular area undergoing work. Accordingly, uses which are not adjacent to the Project construction site would not be anticipated to be substantially affected by construction lighting.

Daytime glare could potentially accompany 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 within each area of the Project Site. In addition, large surfaces that are usually required to generate substantial glare are typically not an element of construction activities. Furthermore, construction activities would be screened by surrounding perimeter landscaping and temporary fencing. As such, construction of the Project would not create a new source of substantial glare which would adversely affect day or nighttime views in the area.

Based on the above, light and glare associated with temporary Project construction would not substantially alter the character of off-site areas surrounding the Project Site or adversely impact day or nighttime views in the area. Moreover, pursuant to SB 743, PRC Section 21099, and Zoning Information File ZI No. 2452, the Project's aesthetics impacts would not be considered significant.

As discussed above under Section 3, Project Description, of this Initial Study, portions of the Project at or above the highest occupied floor would incorporate architectural accent lighting to emphasize the Project's architectural identity as part of the skyline and may be backlit. Exterior architectural accent lighting on all buildings would be utilized to enhance the perception of each building's architectural character and create visual interest along the streets and public spaces from which they are visible; as well as to reinforce the composition created by the buildings on the North, South and West Sites.

All architectural lighting would be configured with timer or photo-sensors to automatically turn on at dusk and turn off at dawn. The architectural accent lighting would have the ability to be lit in a variety of colors, which may be used to celebrate holidays or days of cultural significance. The Project would observe no more than 60 such days per calendar year to utilize the colored architectural accent lighting. None of the proposed architectural accent lighting would include any moving lights or dynamic lighting effects. All proposed lighting would be steady in intensity and color throughout a single night. No still or moving images would be projected onto the buildings.

Pedestrian and publicly accessible areas would be well-lit for security. Project lighting would also include ground level commercial lighting, common and private open area lighting, interior and outdoor lighting, and accent lighting. Light fixtures would share a consistent design aesthetic and would be configured to minimize light pollution. Additionally, light fixtures on the Project Site would be shielded and directed toward the areas to be lit and away from off-site properties. Furthermore, the Project would comply with LAMC Section 93.0117(b), which limits exterior lighting to no more than 2 foot-candles of lighting intensity or receive direct glare from the light source on properties containing residential units.

Lighting would be required to conform to the following LAMC regulations:

- Chapter 1, Article 2, Section 12.21 A 5(k). All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and adjacent premises.
- Chapter I, Article 4.4, Section 14.4.4 E. No sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than three-foot candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.
- Chapter I, Article 7, Section 17.08 C. Plans for street lighting shall be submitted to and approved by the Bureau of Street Lighting for subdivision maps.
- Chapter IX, Article 3, Division 1, Section 93.0117(b). No person shall construct, establish, create, or maintain any stationary exterior light source that may cause the following locations to be either illuminated by more than two-foot candles (21.5 lx) of lighting intensity or receive direct glare from the light source. Direct glare, as used in this subsection is a glare resulting from high luminances or insufficiently shielded light sources that are in the field of view.

Pursuant to SB 743 and ZI 2452, the Project would result in a less than significant impact with respect to artificial light, and no further analysis of this topic in the EIR is required.

With regard to glare, daytime glare is common in urban areas and is typically created when sun reflects off mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials, particularly following sunrise and prior to sunset. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic or glass curtain walls and trim. Sun shading throughout the Project Site would reduce solar

exposure along the Project's west and south façades to minimize glare. In addition, the color pallet and exterior materials would not be highly reflective and are not anticipated to result in glare that would affect daytime or nighttime views in the area. Based on the above, with adherence to regulatory requirements, construction and operation of the Project would not create a new source of substantial light or glare which would adversely affect daytime and nighttime views in the area.

It is further noted, pursuant to SB 743 and ZI 2452, the Project would result in a less than significant impact with respect to glare, and no further analysis of this topic in the EIR is required.

II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California 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. 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 comprises three developed infill sites containing cold storage facility/warehouse uses and paved surface parking. The Project Site is zoned for industrial uses and no agricultural uses or related operations are present on the Project Site or in the surrounding highly urbanized area. The Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.[9] As the Project would not convert farmland to non-agricultural uses, no impact would occur. No further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is designated as Light Industrial in the Central City Community Plan, with corresponding zones of M2-2D and M2-2D-O which permit a range of industrial uses prevalent in the area such as warehouses and manufacturing facilities, and also permits commercial and office uses. The Project Site is developed with cold storage facility/warehouse uses and paved surface parking. The Project Site is completely developed within an urban area. No agricultural zoning is present in the Project vicinity, and neither the Project Site nor nearby parcels are enrolled under the Williamson Act. As such, the Project would not conflict with existing zoning for agricultural uses or a Williamson Act contract, and no impact would occur. No further analysis of this topic in the EIR is required.

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

No Impact. As discussed in the response to Checklist Question No. II.b, above, the Project Site is zoned Light Industrial in the Central City Community Plan, with corresponding zones of M2-2D and M2-2D-O. This zoning permits a range of industrial uses prevalent in the area such as warehouses and manufacturing facilities, and also permits commercial and office uses. The Project Site is entirely developed with cold storage facility/warehouse uses and paved surface parking. Furthermore, consistent with the built, urbanized area surrounding the Project Site, the larger Project vicinity is zoned for light industrial, commercial, and residential uses. No forest land or land zoned for timberland production is present on the Project Site or in the surrounding area. As such, the Project would not conflict with existing zoning for forest land or timberland, and there would be no impact. No further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is entirely developed with cold storage facility/warehouse uses and paved surface parking. No forest land exists on-site or in the Project vicinity. As such, the Project would not result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur. No further analysis of this topic in the EIR is required.

[9] California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County available at: https://maps.conservation.ca.gov/dlrp/ciff/. Accessed May 6, 2021.

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

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

III. AIR QUALITY

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

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

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (Basin). Within the Basin, the Southern California Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [PM2.5], and lead[10]). SCAQMD's 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional

[10] Partial Nonattainment designation for lead for the Los Angeles County portion of the Basin only.

issues relating to transportation, the economy, community development and the environment.[11] With regard to future growth, SCAG has prepared the Regional Transportation Plan/Sustainable Communities Strategy, which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area. Construction and operation of the Project would result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on SCAQMD's implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project's consistency with SCAQMD's AQMP.

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?

Potentially Significant Impact. As discussed above, construction and operation of the Project would result in the emission of air pollutants in the Basin, which is currently in non-attainment of federal air quality standards for ozone, PM2.5, and lead, and state air quality standards for ozone, particulate matter less than 10 microns in size (PM10), and PM2.5. Therefore, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. The EIR will provide further analysis of cumulative air pollutant emissions associated with the Project.

c. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. The Project Site is located in an urbanized area of the City, which includes a mix of uses, including residential uses in the Project vicinity. Construction activities and operation of the Project could increase air emissions above current levels. Therefore, the EIR will provide further analysis of potential impacts associated with the exposure of sensitive receptors to substantial pollutant concentrations generated by the Project.

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

Less Than Significant Impact. As discussed under Response to Checklist Questions III.a-c, construction and operational air quality emissions generated by the Project will be evaluated in an EIR. However, the Project would not generate other emissions, such as those leading to odors, that could adversely affect a substantial number of people. Objectionable odors are typically associated with industrial activities involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. Odor impacts are also associated with such uses as sewage treatment facilities and landfills. The Project includes new residential, office, hotel and commercial uses that would not introduce any major odor-producing uses that would have the potential to affect a substantial number of people. Activities and materials associated with construction would be typical of construction projects of similar type and size. On-site trash receptacles would be covered and properly maintained in a manner that promotes odor control. Any odors that may be generated during construction of the Project would be localized and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. Odors associated with Project operation would be

[11] SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

limited to those typical activities associated with occasional food preparation activities in on-site restaurants, and on-site waste generation and disposal (e.g., trash cans, dumpsters). Disposal containers would be covered and located below grade at all three sites. Because these uses constitute minor odor sources, Project operation is not expected to create substantial objectionable odors. Impacts with regard to odors would be less than significant and no further analysis of this topic in an EIR is 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 US Fish and Wildlife Service?	☐	☐	☐	☒
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. 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. A significant impact would occur if a project would remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the state or federal regulatory agencies cited above. The Project Site is located in an urbanized area of Los Angeles and is currently developed with cold storage facility/warehouse uses and paved surface parking. The Project Site does not contain any natural open spaces, act as a wildlife corridor, nor possess any areas of significant biological resource value.[12] No hydrological features are present on the Project Site and there are no sensitive habitats present. Due to the urbanized nature of the Project Site and surrounding area, the Project Site does not support habitat for candidate, sensitive, or special status species identified in local plans, policies, regulations, by the California Department of Fish and Wildlife (CDFW), the California Native Plant Society (CNPS), or the U.S. Fish and Wildlife Service (USFWS). Therefore, a less than significant impact would occur, and no further analysis of this topic in the EIR is required.

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

No Impact. A significant impact would occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the state and federal regulatory agencies cited would be adversely modified by a project. As discussed above, the Project Site and surrounding area are located in an urbanized setting. There are no riparian areas, sensitive natural communities, or Significant Ecological Areas as defined by the City of Los Angeles located on or adjacent to the Project Site.[13] Therefore, a less than significant impact would occur, and no further analysis of this topic in the EIR is required.

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?

No Impact. The Project Site is located in an urbanized setting and is developed with cold storage facility/warehouse uses and paved surface parking. The surrounding area has been fully developed with urban uses and associated infrastructure. The nearest water body is the Los Angeles River, located approximately 0.5 miles east of the Project Site. The Project Site does not contain any wetlands as defined by Section 404 of the Clean Water Act. Therefore, the Project would not have an adverse effect on federally protected wetlands. No impact would occur. No further analysis of this topic in the EIR is required.

[12] Navigate LA, Significant Ecological Areas layer: http://navigatela.lacity.org/navigatela/, accessed June 18, 2021.

[13] NavigateLA, Water, Lakes, and Streams layer: http://navigatela.lacity.org/navigatela/, June 18, 2021.

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

Less than Significant Impact. A significant impact would occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. The Project Site is developed with cold storage facility/warehouse uses and paved surface parking and currently does not interfere substantially with the movement of any native resident or migratory birds. The Project Site is located within an urban area that is highly disturbed. No waterbodies are located on-site or adjacent to the Project Site that would contain or support habitat for native resident or migratory bird species. Nonetheless, according to the Tree Report prepared for the Project Site (included as Appendix A to this Initial Study), there are 20 fern pine street trees located adjacent to the Project Site. During Project construction activities, the removal of these trees would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. To the extent that vegetation removal activities must occur during the nesting season (February 1 through August 31), a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If any active nests are detected, the area would be flagged with a buffer (ranging between 50 and 300 feet, as determined by the monitoring biologist), and the area would be avoided until the nesting cycle has been completed or the monitoring biologist has determined that the nest has failed. With compliance with existing regulatory requirements, impacts to nesting and migratory birds would be less than significant and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. The City's Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least 4 inches in diameter at breast height. These tree species are defined as "protected" by the City. Trees that have been planted as part of a tree planting program are exempt from the City's Protected Tree Ordinance and are not considered protected. The City's Protected Tree Ordinance prohibits, without a permit, the removal of any regulated protected tree, including "acts which inflict damage upon root systems or other parts of the tree […]" and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety.

According to the Tree Report prepared for the Project by ESA in June 2021 and included in Appendix A of this Initial Study, a total of 20 street trees, all fern pines, are located around the perimeter of the Project Site. None of the trees located within the Project Site are considered protected trees. However, all of the fern pines would be removed to support development of the Project. Currently, the City's Urban Forestry Department requires a 2 to 1 street tree replacement ratio, which the Project would comply with. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant and further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is located within a developed, urbanized area and does not provide habitat for any sensitive biological resources. The Project Site is not located within a habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.[14] Therefore, the Project would not conflict with the provisions of an adopted conservation plan. No impact would occur. No further analysis of this topic in the EIR is 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. Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines §15064.5?

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

The six-story brick building at 715 4th Street was constructed in the early 1900s and designed by architect George Wyman, who is best known for designing the Bradbury Building in downtown Los Angeles. The building is identified in the SurveyLA Historic Resources Survey Report for the Central City Community Plan area as an individual resource. The building is further identified by SurveyLA as the Los Angeles Ice and Cold Storage Company building, which played an important role in the distribution of agricultural goods and locally sourced food products in the early 20th

[14] City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS) Parcel Profile Report: 707 (715) E. 4th Street, 364, 400 – 458, 425, 427, 429, and 431-433 S. Central Avenue. Generated May 1, 2021.

century. Based on the age of the building, the importance of the architect, and the historic use of the building, the EIR will provide further analysis of potential direct and indirect impacts to historical resources.

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

Potentially Significant Impact. Section 15064.5(a)(3)(D) of the State *CEQA Guidelines* generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is currently developed with cold storage facility/warehouse uses and paved surface parking. However, due to the age of the on-site improvements and the possible lack of associated grading or excavations at the time of construction, historical disturbance of the underlying soils may have been minimal and the potential for the existence of extant archaeological resources is unknown and archaeological resources may be present, such as the Zanja Madre which is known to exist in the local Project vicinity. The Zanja Madre (Mother Ditch) is the original aqueduct that brought water to the Pueblo de Los Angeles from the Rio Porciuncula (Los Angeles River). It was originally an open, earthen ditch which was completed by community laborers within a month of founding the pueblo in 1871. The ditch underwent many alterations over the years and was still in use until the early 20th century.[15] Project construction would require grading and excavation activities for building foundations that could have the potential to disturb existing or undiscovered archaeological resources. Therefore, the EIR will provide further analysis of potential impacts to archaeological resources.

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact

As discussed above, the Project Site is located within an urbanized area and has been subject to previous grading and development. Therefore, the potential for uncovering human remains on the Project Site is low. Nevertheless, the Project would require grading, excavation, and other construction activities that could have the potential to disturb existing but undiscovered human remains. If human remains were discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determined the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the person or persons it believes to be most likely descended from the deceased Native American.

[15] Water and Power Associates website, https://waterandpower.org/museum/Zanja%20Madre%20(Original%20LA%20Aqueduct).html, accessed July 21, 2021.

The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98.

Therefore, due to the low potential that any human remains are located on the Project Site, and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project's impact related to human remains would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is 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. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Potentially Significant Impact. As discussed above, the Project Site is currently developed with cold storage facility/warehouse uses and paved surface parking. The Project would remove the existing uses for the development of a mixed-use project with approximately 2,318,534 sf of floor area. Due to the increased floor area and mix of uses, the Project would generate an increased demand for electricity and natural gas services provided by the Los Angeles Department of Water and Power (LADWP) and the Southern California Gas Company, respectively. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources, further analysis of the Project's demand on existing energy resources will be provided in the EIR.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact.

As previously described, the Project Site is currently developed with cold storage facility/warehouse uses and paved surface parking. The Project would replace the existing uses for the development of a mixed-use project with approximately 2,318,534 sf of floor area. The Project Site does not include any renewable energy sources used by LADWP. 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. While the Project would not be anticipated to conflict with or obstruct a state or local

plan for renewable energy or energy efficiency, the Project's compliance with LADWP's plans for renewable energy as well as the Project's compliance with California Building Energy Efficiency Standards will be further evaluated in the EIR.

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 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 waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐

The analysis of geology and soils is based in part on three Preliminary Geotechnical Investigation reports, with separate reports prepared for the North Site, South Site and West Sites. [16] All specific information on geologic and soils conditions in the discussion below is from the reports unless otherwise noted. The reports are included as Appendix B of this Initial Study.

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.

Less Than Significant Impact. Surface fault rupture occurs when movement on a fault breaks through to the earth's surface. Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are faults that have historically produced earthquakes or shown evidence of movement within the past 11,000 years. Potentially active faults have demonstrated displacement within the last 1.6 million years. Inactive faults do no exhibit displacement younger than 1.6 million years before the present.

The California Geological Survey establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones. These zones extend from 200 feet to 500 feet on each side of the known fault and identify areas where a potential surface rupture could provide 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.

According to the Preliminary Geotechnical Investigations, the Project Site is not within a state-designated Alquist-Priolo Earthquake Fault Zone. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. The nearest active fault with the potential for ground rupture to the Project Site is the Hollywood Fault, which is located approximately 5.2 miles to the northwest of the Project Site.[17] Therefore, the Preliminary Geotechnical Investigations concluded that the potential for surface rupture due to faulting occurring beneath the Project Site during the design life of the proposed development is considered low.

Additionally, given that no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site, the Project would not exacerbate existing fault rupture conditions. Construction of the Project would be subject to compliance with existing state and local regulations, including the California Building Code (CBC) and the Los Angeles Building Code (LABC) and with the recommendations contained in the final geotechnical report(s) prepared for the Project by a licensed engineer and approved by the City of Los Angeles

[16] Geocon West, Inc, *Preliminary Geotechnical Investigation – Proposed Mixed-Use and High-Rise Development 410 South Central Avenue, North Site, 715 East 4th Street, 364 South Central Avenue, Los Angeles California*, September 13, 2021; Geocon West, Inc,, *Preliminary Geotechnical Investigation – Proposed Mixed-Use and High-Rise Development 410 South Central Avenue, South Site, 730 East 4th Street, 400-464 (even) South Central Avenue, Los Angeles California*, September 13, 2021; and, Geocon West, Inc, *Preliminary Geotechnical Investigation – Proposed Mixed-Use and High-Rise Development 410 South Central Avenue, West Site, 425, 427, 429, 431, and 433 South Central Avenue, Los Angeles California*, September 13, 2021.

[17] Geocon West, Inc, *Preliminary Geotechnical Investigation – Proposed Mixed-Use and High-Rise Development 410 South Central Avenue, North Site, 715 East 4th Street, 364 South Central Avenue, Los Angeles California*, September 13, 2021, page 5, Appendix B of this Initial Study.

Department of Building and Safety (LADBS). The CBC and LABC, with which the Project would be required to comply, contain construction requirements to ensure that structures are built to a level such that they can withstand acceptable seismic risk. Therefore, the Project would not cause potential substantial adverse effects as a result of a known earthquake fault in or around the Project Site. Therefore, Project impacts with respect to fault rupture would be less than significant, and no further analysis of this topic in the EIR is required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in a seismically active Southern California region. Known regional active faults that could produce significant ground shaking at the Project Site include the Hollywood Fault, the Newport-Inglewood Fault, the Raymond Fault, and the Whittier Fault. Potentially active blind thrust faults in the region are believed to include the Northwood Thrust, Puente Hills Blind Thrust and the Upper Elysian Park Blind Thrust. However, the Project does not include the types of activities, such as mining operations, the extraction or injection of oil or groundwater, or other industrial activities that would cause or exacerbate substantial adverse effects involving strong seismic ground shaking.

Given the Project Site's location in a seismically active region, the Project Site could experience seismic ground shaking in the event of an earthquake. However, as with any new development in the State of California, building design and construction for the Project would be required to conform to the current seismic design provisions of the CBC. The CBC would preclude the Project from employing techniques or methods which would directly or indirectly initiate or worsen seismic ground shaking as part of the normal construction and operations. The CBC 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 provide for the latest in earthquake safety. Additionally, construction of the Project would be required to adhere to the seismic safety requirements contained in the LABC, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property, or infrastructure directly or indirectly to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region, and would minimize the potential to expose people or structures to substantial risk, loss, or injury.

In addition, the Preliminary Geotechnical Investigations were prepared for the Project Site (included in Appendix B of this Initial Study), which included an analysis of the Project with respect to seismic conditions, and developed recommendations for design and construction of the proposed Project buildings and structures. A final design level geotechnical report(s) would be required and reviewed to the satisfaction of the Department of Building and Safety prior to the issuance of grading permits, and the final recommendations from that report will be enforced during construction of the Project. Based on the Preliminary Geotechnical Investigations contained in Appendix B of this Initial Study, the Project may be constructed using standard, accepted, and proven engineering practices considering the seismic shaking potential and geologic conditions at the Project Site.

Based on the above, development of the Project would not exacerbate seismic conditions on the Project Site. With compliance with existing building codes, Project impacts associated with

seismic ground shaking would be less than significant, and no further analysis of this topic in the EIR is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Liquefaction is typified by a loss of shear strength in the liquefied layers due to rapid increases in pore water pressure generated by earthquake accelerations.

The current standard of practice, as outlined in the "Recommended Procedures for Implementation of DMG Special Publication 117, Guidelines for Analyzing and Mitigating Liquefaction in California" and "Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California" requires liquefaction analysis to a depth of 50 feet below the lowest portion of the proposed structure. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained, primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to induce liquefaction.

According to the State of California Seismic Hazard Zone Map for the Los Angeles Quadrangle , the Project Site is not located within an area identified as having a potential for liquefaction. Also, the City of Los Angeles General Plan Safety Element further indicates that Project Site is not located in an area susceptible to liquefaction or to potential liquefaction.[18] Excavation during construction of the Project would occur to a depth of approximately 57 feet bgs for the lowest foundations and approximately 64 bgs in isolated areas for elevator pits.[19] The historically highest groundwater level in the area is approximately 75 feet beneath the ground surface.[20] Based on this consideration, as well as the density of the soils at depth of feet below the lowest proposed structures, the Preliminary Geotechnical Investigation reports concluded that liquefaction potential at the Project Site is low.

Construction of the Project would not involve the injection of water or any other liquid into the ground. In addition, construction of the Project would be subject to the LABC requirements and recommendations included in the final geotechnical report(s). Based on the above, development of the Project would not directly or indirectly cause or exacerbate geologic hazards, including seismic-related liquefaction. Therefore, Project impacts related to liquefaction would be less than significant, and no further analysis of this topic in the EIR is required

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[18] City of Los Angeles Safety Element City of Los Angeles, Department of City Planning, Safety Element of the General Plan, Exhibit B, Areas Susceptible to Liquefaction. Available at: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf. Accessed May 18, 2021.

[19] KPFF Consulting Engineers, Fourth and Central Hydrology and Water Quality Report, December 9, 2021, page 9 (see Appendix D of this Initial Study).

[20] Geocon West, Inc., *Preliminary Geotechnical Investigation – Proposed Mixed-Use and High-Rise Development 410 South Central Avenue, South Site, 730 East 4th Street, 400-464 (even) South Central Avenue, Los Angeles California*, September 13, 2021, page 8, Appendix B of this Initial Study.

iv. Landslides?

No Impact. The Project Site is relatively flat as it has an elevation of 259 feet above mean sea level (AMSL) on the northwest corner of the Project Site and an elevation of 253 feet AMSL on the southeast corner of the Project Site, a drop of approximately six feet across an approximately 7.6-acre site. Thus, there is little to no slope that could result in a landslide on-site. ZIMAS does not designate the Project Site as being susceptible to landslides.[21] The Project Site is also not in proximity to any hillsides or cuts and, as such, the Project Site would be not susceptible to landslides from off-site sources. Further, according to the Preliminary Geotechnical Investigations, the Project Site is not in a designated earthquake-induced landslide hazard zone. Therefore, the potential for landslides is negligible. The Project would result in no impacts with respect to landslides, and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. The Project Site is currently developed with cold storage facility/warehouse uses and paved surface parking. As such, there are no extensive open spaces with exposed topsoil. During the Project's construction phase, activities such as excavation below ground surface, grading, and site preparation could leave soils at the Project Site susceptible to soil erosion. The Project Applicant would be required to comply with SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the Project Site, as well as to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good- housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City (specifically LA Sanitation/Department of Public Works) for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities.

Additionally, all Project grading activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during the rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during the construction phase. Further, during the Project's operational phase, most of the Project Site would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features and would not come into contact with sizeable areas of bare soil surfaces such that the potential for subsequent erosion would be very low. Therefore, with compliance with

[21] City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org. Accessed May 18, 2021.

applicable regulatory requirements, development of the Project would not cause or exacerbate soil erosion or loss of topsoil and impacts regarding soil erosion or the loss of topsoil would be less than significant. No further analysis of this topic in the EIR is required.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. As discussed previously, the liquefaction potential at the Project Site is considered to be low. Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. As discussed in the Preliminary Geotechnical Investigations, the Project Site is not located within an area of known ground subsidence, and is underlain by shallow bedrock. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the Project Site or in the general site vicinity. Therefore, there appears to be little or no potential for ground subsidence due to withdrawal of fluids or gases at the Project Site.

The Project Applicant would be required by the LADBS, as part of the permitting process, to submit a final geotechnical report(s) that would address the building standards and recommendations that shall be followed in order to construct the proposed structure in accordance with CBC and LABC building standards that apply to buildings within the types of soils found at the Project Site, including areas prone to geologic or soil instability. Through compliance with the CBC and LABC, and with recommendations included in the final geotechnical report(s), impacts related to geologic and soil instability would be less than significant. Based on the above, development of the Project would not cause or exacerbate geologic hazards by being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project. Project impacts would be less than significant, and no further analysis of this topic in the EIR is required.

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?

Less Than Significant Impact. Expansive soils are generally clayey soils or soils that have sufficient clay content such that they swell when wetted and shrink when dried. Expansive soils located beneath structures can result in cracks in foundations, walls, and floors that develop over time from long term cyclical wetting and drying periods. According to the Preliminary Geotechnical Investigations, the upper 5 feet of existing site soils encountered during the investigation are considered to have a “very low” expansive potential (EI = 0); and are classified as “non-expansive” based on the 2019 CBC) Section 1803.5.3. The soils encountered at the subterranean levels are primarily granular in nature and anticipated to be “non-expansive.” Recommendations presented in the Preliminary Geotechnical Investigations assume that proposed foundations and slabs will derive support in these materials. Therefore, with adherence to existing regulations and site-specific design recommendations, development of the Project would not cause or exacerbate geologic hazards, and a less than significant impact would occur with respect to expansive soils. No further analysis of this topic in the EIR is required.

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

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

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact. The Project Site is currently developed with cold storage facility/warehouse uses and paved surface parking. However, due to the age of the on-site improvements and the possible lack of associated grading or excavations at the time of construction, historical disturbance of underlying soils may have been minimal. The Project area may include formations known to be sensitive for significant paleontological resources. The Project would require grading and excavation for building foundations and subterranean parking that could extend into native soils potentially containing undiscovered paleontological resources. Therefore, the EIR will provide further analysis of potential impacts to paleontological resources.

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

Potentially Significant Impact. Gases that trap heat in the atmosphere are called greenhouse gases since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere affects the earth's temperature. The State of California has undertaken initiatives designed to address the effects of greenhouse gas emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California. Nevertheless, activities associated with the Project, including construction and operational activities, could result in greenhouse gas emissions that may have a significant impact on the environment. Therefore, the EIR will provide further analysis of the Project's greenhouse gas emissions.

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

Potentially Significant Impact. As the Project would have the potential to emit greenhouse gases, the EIR will include further evaluation of Project-related emissions and associated emission reduction strategies to determine whether the Project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases (e.g., Assembly Bill [AB] 32, SCAG RTP/SCS, L.A.'s Green New Deal (Sustainable City pLAn 2019).

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 it 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?	☐	☐	☒	☐
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 *Phase I Environmental Site Assessment* (Phase I ESA) prepared for the Project by Geocon West, Inc., dated September 10, 2020. This report is included as Appendix C of this Initial Study.

a. 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 of the Project would not involve the routine transport of hazardous materials to and from the Project Site. 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 caustic or acidic cleaners could be routinely used on the Project Site through the duration of construction. While some hazardous materials used during construction could require disposal, such activity would occur only for the duration of construction and would cease upon completion of the Project. As such, construction of the Project would not involve the routine disposal of hazardous materials. Notwithstanding, 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, there are regulations aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. The Project would be in full compliance 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 (RCRA), California Hazardous Waste Control Law, federal and state Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by LADBS. Such requirements include obtaining material safety data sheets from chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train employees about hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in commercial uses, hotel, office and residential uses including cleaning products, paints, and those used for maintenance of landscaping. Such use would be consistent with that currently occurring on the Project Site and other nearby developments. As a mixed-use commercial, hotel, office and residential development, the Project would not involve the routine transport, use, and disposal of large quantities of hazardous materials. The Project's limited use of common hazardous materials can typically be disposed of at Class II or III landfills, which accept most common waste materials, such as those identified above. In addition, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with all applicable federal, state, and local requirements.

Based on the above, with compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, the Project's impact associated with the routine transport, use, or disposal of hazardous materials during construction and operation of the Project would be less than significant. No further evaluation of this topic in an EIR is required.

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?

Less Than Significant Impact. The Phase I ESA was performed to assess the potential for the presence of hazardous substances and/or petroleum product impacts at the Project Site. The purpose of the Phase I ESA was to identify evidence or indications of Recognized Environmental Conditions (RECs), which are defined in Section 1.1.1 of the American Society for Testing and Materials (ASTM) Designation E 1527-13 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. De minimis conditions are not recognized environmental conditions."

To determine if any RECs exist at the Project Site, the analysis conducted as part of the Phase I ESA reviewed: 1) Physical Setting: A review of the physical setting to obtain information concerning the topographic, geologic, and hydrogeologic characteristics of the Project Site and vicinity. Such information may be indicative of the direction and/or extent that a contaminant could migrate in the event of a spill or release. 2) Records Review: A review of publicly available Federal, State, and local regulatory agency records to obtain information that could potentially help identify RECs at or potentially affecting the Project Site. 3) Site History: A review of historical references to assess the history of previous uses of the Project Site and surrounding area to identify those that could have led to RECs on or near the Project Site. Historical sources reviewed included Sanborn Fire Insurance Maps, aerial photographs, topographic maps, and city directories. In addition, interviews were conducted with persons who were expected to be reasonably knowledgeable about historical and/or current conditions at and uses of the Project Site. 4) Site Reconnaissance: A site reconnaissance was performed to observe site conditions and activities for indications of evidence of RECs.

As discussed in the Phase I ESA, the Project Site is identified on various environmental databases as a facility that stores and generates small quantities of hazardous materials. However, the inclusion of the Project Site on these database sites provided no evidence of RECs in connection with the Project Site.

Based on a review of the historic uses of the Project Site, the Project Site includes a development history dating back to the late 1800s. While a mix of various uses, including residential dwellings and commercial uses, occupied portions of the Project Site in the early 1900's, the North Site for most of the 1900s and the South Site since the late 1950s to the present day have been occupied by cold storage facilities and warehouse uses. Portions of the North and South Sites were occupied by railroad tracks and a portion of a railroad depot in the late 1800s through the mid-1950s. The West Site was developed with a mix commercial and industrial uses from the early 1900s to the 1970s, after which the West Site has since been utilized for surface parking. Although, the Phase I ESA found no records of former or existing underground storage tanks (USTs) in federal, state, and local environmental databases and at the LACFD, undocumented USTs may be present on the Project Site.

As analyzed in the Phase I ESA, while it is possible that metals and pesticides may be present in soil in the vicinity of the railroad track at concentrations that could represent a concern for future development/use of the Project Site, the Phase I ESA concluded that there is insufficient evidence

to identify the railroad tracks as an REC, since the Project Site was not a maintenance facility and evidence of potentially problematic ballast materials (slag ballast) or indications of potential spills or releases, such as stained soil, were not observed along the railroad tracks.

The Phase I ESA also evaluated off-site properties within one-quarter mile of the Project Site that are listed on one or more release-related databases, the status of their listings, and their potential, if any, to cause (or have caused) an REC at the Project Site. Based on their clean-up status, proximity to the Project Site, and/or down gradient relationship to the Project Site, no off-site properties were determined to present an REC at the Project Site.

A site reconnaissance was performed as part of the Phase I ESA analysis and did not reveal any evidence of RECs on the Project Site or on adjacent properties.

Based on the analysis summarized above, the Phase I ESA revealed no evidence of RECs in connection with the Project Site. Nonetheless, below is an evaluation of the potential hazardous materials that may be encountered on the Project Site during construction and operation of the Project.

Construction

Hazardous Waste Generation, Handling, and Disposal

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 caustic or acidic cleaners, could be used, and therefore, would require proper handling and management and, in some cases, disposal. The use, handling, storage, and disposal of these materials could increase the opportunity for hazardous materials releases and, subsequently, the exposure of people and the environment to hazardous materials. However, as previously discussed, 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.

As discussed above, the Phase I ESA analysis indicated that it is possible that metals and pesticides may be present in soil in the vicinity of the railroad track at concentrations that could represent a concern for future development/use of the Project Site. In addition, given the long history and occupancy of the Project Site with warehouse and other cold storage uses, as with most developed sites in industrial areas, there could be the potential to encounter contaminated soils. In the event that contaminated soils are encountered during construction, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166. Specifically, SCAQMD Rule 1166 requires that an approved mitigation plan be obtained from SCAQMD prior to commencing any of the following activities: the excavation of an underground storage tank or piping which has stored VOCs; the excavation or grading of soil containing VOC material including gasoline, diesel, crude oil, lubricant, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOCs; the handling or storage of VOC-contaminated soil [soil which registers>50 parts per million (ppm) or greater using an organic vapor analyzer (OVA) calibrated with hexane] at or from an excavation or grading site; or the treatment of VOC-contaminated soil at a facility. SCAQMD Rule 1166 further requires that

a copy of the approved mitigation plan be on site during the entire excavation period and that the SCAQMD executive officer be notified at least 24 hours prior to excavation. In accordance with SCAQMD Rule 1166, monitoring for VOC contamination would occur at least once every 15 minutes and VOC concentration readings would be recorded. If VOC-contaminated soil is detected, the approved mitigation plan would be implemented. In addition, the Project would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of the NPDES Construction General Permit, the Project would implement a SWPPP adhering to the California Stormwater Quality Association BMP Handbook. The SWPPP would set forth BMPs to be used during construction 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. In addition, Project construction activities would occur in accordance with City grading permit regulations. Furthermore, as part of standard construction practices, soil is routinely tested for contaminates to ensure removed soils meet the disposal requirements of the receiving construction and demolition (C&D) facility or construction site.

Underground Storage Tanks

According to the Phase I ESA, no evidence of existing USTs was observed on the Project Site. No other records were found that indicate the presence of USTs within the Project Site. Nonetheless, in the unlikely event that USTs are found, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. Specifically, if underground storage tanks are encountered, prior to removal, applicable permits would be obtained from the LAFD.

Asbestos-Containing Materials

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. Any building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos-containing materials (ACMs). Based on the age of the on-site buildings (i.e., constructed in the early 1900s), ACMs may be present on-site. Thus, in accordance with SCAQMD Rule 1403, the Project Applicant would be required to conduct a comprehensive asbestos survey prior to demolition, subject to approval by LADBS. In the event that ACMs are found within areas proposed for demolition, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations.

Lead-Based Paint

The demolition of buildings containing lead-based paint (LBP) is subject to a comprehensive set of California regulatory requirements that are designed to assure the safe handling and disposal of these materials. Cal/OSHA has established limits of exposure to lead contained in dusts and fumes, which provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead, particularly since demolition workers are at greatest risk of adverse exposure. Lead-contaminated debris and other wastes must also be managed and disposed of in accordance with applicable provisions of the California Health and Safety Code. Testing of any suspected buildings or portions thereof for LBP is part of standard construction practice at the time of demolition and/or renovation. Therefore, suspect materials would be removed in accordance with procedural requirements and regulations for the

proper removal and disposal of LBP prior to demolition activities, including standard handling and disposal practices pursuant to OSHA regulations.

Polychlorinated Biphenyls

Typical sources of PCBs include electrical transformer cooling oils, fluorescent light fixture ballasts, and hydraulic oil. In 1976, the United States Environmental Protection Agency (USEPA) banned the manufacture and sale of PCB-containing transformers. In the event that PCBs are found within areas proposed for demolition, suspect materials would be removed in accordance with all applicable federal, State, and local regulations.

Oil Wells and Methane

According to the California Department of Conservation's Geologic Energy Management Division's (CalGEM) online mapping application Well Finder, the Project Site is located within the Union Station oil field, however, no oil or natural gas wells are located on the Project Site.[22] Since the Project Site is within an oil field, there is a remote possibility that undocumented abandoned wells or other undocumented wells could be encountered during excavations. Any wells encountered during construction would be required to be abandoned in accordance with current CalGEM standards and regulations.

According to ZIMAS, the northern portion of the Project Site has been identified by LADBS to be within a "Methane Zone." These areas have a risk of methane intrusion emanating from geologic formations. Due to the potential environmental risk associated with construction in a Methane Zone, the Project is subject to developmental regulations pertaining to ventilation and methane gas detection systems that are mandated by the City of Los Angeles. Development would occur per the provisions of the City of Los Angeles Building Code, Division 71, which pertains to construction requirements for these areas. Per Division 71, the Applicant would be required to conduct a methane assessment prior to the redevelopment of the Project Site. As part of the Project design, the proposed buildings would have adequate ventilation required by LAMC Sections 91.7102 to 91.709, which requires that a gas-detection system be installed in the basement or on the lowest floor level on grade, and within the underfloor space in buildings with raised foundations. Compliance with the construction requirements described above ensure that the Project would not result in reasonably foreseeable upset or accident conditions involving the release of methane gas into the environment.

Conclusion

Based on the above, adherence to standard construction practices and compliance with existing regulations would ensure the 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 into the environment.

Operation

Operation of the Project Site would involve the routine use of small quantities of potentially hazardous materials typical of those used in office, hotel, residential and commercial uses. As

[22] California Department of Conservation's Geologic Energy Management Division's (CalGEM) online mapping application Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.23531/34.04546/16, accessed November 22, 2021.

stated previously, activities involving the handling and disposal of hazardous wastes would occur in compliance with all applicable federal, state, and local requirements concerning the handling and disposal of hazardous waste. Therefore, with compliance with applicable regulations and requirements, operational 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 into the environment. Impacts associated with hazardous waste generation, handling, and disposal during operation of the Project would be less than significant.

In addition, the northern portion of the Project Site is located within a Methane Zone identified by the City. Therefore, as described above, the Project would be developed in accordance with the methane requirements set forth in Division 71 of the City's Building Code. Compliance with these construction requirements would ensure that the Project would not result in reasonably foreseeable upset or accident conditions involving the release of methane gas 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?

Less Than Significant Impact. The Lumbini Child Development Center, located at 505 E. 3rd St. Los Angeles, CA 90013, is approximately 0.15 miles north of the Project Site. As discussed above, the types and amounts of hazardous materials that would be used in connection with Project construction activities would be typical of those used during construction of mixed-use residential and commercial developments, including vehicle fuels, paints, oils, and transmission fluids. In addition, as described under Response to Checklist Question IX.b, demolition activities that may encounter ACM, LBP or PCBs would be subject to compliance with applicable regulatory requirements to ensure construction activities do not expose people or the environment to a substantial risk resulting from the release of these hazardous materials into the environment. Further, as also described under Response to Checklist Question IX.b, standard construction practices and compliance with existing regulations would ensure the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the handling and disposal of contaminated soil that may be encountered on-site.

Similarly, the types and amounts of hazardous materials used during operation of the proposed mix of uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. 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 OSHA requirements. As such, the use of such materials would not create a significant hazard to any nearby existing or proposed schools. Therefore, impacts would be less than significant. No further evaluation of this topic in an EIR is required.

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 it 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 to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies. The Phase I ESA for the Project Site obtained a database search report, which is included in Appendix B of the Phase I ESA. The report documents findings of various federal, state, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials or petroleum hydrocarbons. Based on the databases records search, the Project Site was listed on several databases, as listed under Response to Checklist IX.b, above. However, the Project Site was not on the Cortese database. Further, none of the database listings for the Project Site are indicative of releases of hazardous substances or petroleum products. Therefore, impacts regarding this threshold would be less than significant. No further analysis of this topic in an EIR is 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 within an airport land use plan and it is not within 2 miles of a public airport or public use airport. The nearest airports to the Project Site are the Hawthorne Municipal Airport and Los Angeles International Airport (LAX) located approximately 10 and 10.5 miles, respectively, from the Project Site. Because of these distances from the Project Site, the Project would not result in an airport-related safety hazard for people residing or working in the Project vicinity. No impact would occur. No further analysis of this topic in the EIR is required.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Project Site is located in an established urban area that is well served by an existing road network. The City of Los Angeles' General Plan Safety Element identifies the adjacent Central Avenue and 4th Street as Selected Disaster Routes that could be utilized during a disaster event.[23] While it is expected that the majority of construction activities for the Project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. However, through-access for drivers, including emergency personnel, along all roads would still be provided. In addition, in accordance with City of Los Angeles requirements, the Project would develop a Construction Management Plan to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access or impair the implementation of or physically interfere with the City's emergency response plan. As such, the

[23] City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit H – Critical Facilities and Lifeline Systems in the City of Los Angeles. Available at: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf. Accessed May 18, 2021.

Project's impact related to the implementation of the City's emergency response plan during construction would be less than significant.

With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. Furthermore, prior to the issuance of a building permit, the Project Applicant would be required by the LAFD and the LADBS to develop an emergency response plan for the Project in consultation with the LAFD and the LADOT. The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, and location of nearest hospitals and fire departments. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety.

Therefore, Project operation would not impede emergency access within the Project Site or vicinity that could cause an impediment along City designated disaster routes such that the Project would impair the implementation of the City's emergency response plan. As such, the Project's impact related to the implementation of the City's emergency response plan during operation would be less than significant. No further evaluation of this topic in an EIR is required.

g. 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 highly urbanized area, where there are no areas containing flammable brush that could trigger wildfires. No wildlands are present on the Project Site or surrounding area. The Project Site is not within a City-designated wildfire hazard area.[24] In addition, the Project Site is not located within a City-designated Very High Fire Severity Zone.[25] Therefore, the Project would not expose people or structures to a significant risk involving wildland fires caused in whole or in part from the Project's exacerbation of existing environmental conditions and no impact would occur. No further analysis of this topic in the EIR is 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?	☐	☐	☒	☐

[24] City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, Exhibit D – Selected Wildfire Hazard Areas in the City of Los Angeles, https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf. Accessed May 18, 2021

[25] City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS) Parcel Profile Report: 400 S. Central Avenue. Generated May 18, 2021.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 *Fourth and Central Hydrology and Water Quality Report* (Hydrology and Water Quality Report) prepared for the Project by KPFF Consulting Engineers, dated December 9, 2021 This report is included as Appendix D of this Initial Study.

a. 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

In California, the NPDES stormwater permitting program is administered by the State Water Resources Control Board (SWRCB) through its nine Regional Water Quality Control Boards (RWQCBs). This NPDES permit, referred to as General Permit for Stormwater Discharges from

Construction Activities by the SWRCB, establishes a risk-based approach to stormwater control requirements for construction projects.

The SWRCB adopted this General Permit for Stormwater Discharges from Construction Activities on September 2, 2009 (Order No. 2009-0009-DWQ, General NPDES Permit No. CAS000002) and amended the permit on July 17, 2012 (Order Nos. 2010-0014-DWQ and 2012-0006-DWQ). The Construction General Permit regulates construction activity, including clearing, grading, and excavation of areas one acre or more in size, and prohibits the discharge of materials other than stormwater, authorized non-stormwater discharges, and all discharges that contain a hazardous substance, unless a separate NPDES permit has been issued for those discharges. For all construction activities disturbing one acre of land or more, California also mandates the development and implementation of SWPPP. The SWPPP documents the selection and implementation of BMPs to prevent discharges of water pollutants to surface or groundwater. The SWPPP also charges owners with stormwater quality management responsibilities. The developer or contractor for a construction site subject to the General Permit must prepare and implement a SWPPP that meets the requirements of the General Permit.[26]

During construction of the Project, per the NPDES Construction General Permit, the Project would be required to implement a SWPPP that includes BMPs to reduce pollutants in stormwater runoff from the Project Site. The BMPs would adhere to the California Stormwater Quality Association BMP Handbook and would include, but not be limited to use of sandbags, storm drain inlets protection, stabilized construction entrance, wind erosion control, and stockpile management to minimize the discharge of pollutants in stormwater during construction. All construction activities would occur in accordance with City grading permit regulations contained in Chapter IX, Division 70 of the LAMC. The LAMC requires the preparation of a wet weather erosion control plan if construction occurs during the rainy season, and inspection to reduce sedimentation and erosion.

As described above, excavation would occur to a depth of approximately 57 feet bgs for the lowest foundations and approximately 64 bgs in isolated areas for elevator pits.[27] As described in the Preliminary Geotechnical Investigation reports prepared for the Project Site by Geocon West Inc., the highest historical groundwater level is approximately 75 feet bgs and no groundwater was encountered in the borings, drilled to a maximum depth of 100.5 feet below the existing ground surface. Based on historic groundwater levels in the Project Site vicinity and the depth of proposed construction, groundwater is not expected to be encountered during construction.[28]

As discussed under Subsection IX, *Hazards and Hazardous Materials*, above, the Phase I ESA prepared for the Project Site indicates that demolition, excavation, and on-site grading could encounter hazardous materials such as metals and pesticides, which may be present in soil in the vicinity of the abandoned railroad tracks, located on the South Site. In addition, given the long history and occupancy of the Project Site with warehouse and cold storage facility uses, as with most developed sites in industrial areas, there could be the potential to encounter contaminated soils and on-site USTs. As discussed under Subsection IX, above, per SCAQMD Rule 1166, in

[26] State Water Resources Control Board, Construction Stormwater Program, October 30, 2019. https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html., accessed December 5, 2021.

[27] KPFF Consulting Engineers, Fourth and Central Hydrology and Water Quality Report, December 9, 2021, page 9 (see Appendix D of this Initial Study).

[28] KPFF Consulting Engineers, Fourth and Central Hydrology and Water Quality Report, December 9, 2021, page 7 (see Appendix D of this Initial Study).

the event that contaminated soils are encountered during construction, soils would be tested to determine the nature and extent of the contamination and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulations. In addition, Project construction activities would occur in accordance with City grading permit regulations. Furthermore, as part of standard construction practices, soil is routinely tested for contaminates to ensure removed soils meet the disposal requirements of the receiving C&D facility or construction site.

With the implementation of site-specific BMPs included as part of the SWPPP, implementation of the erosion control plan required by the LAMC, compliance with the requirements of SCQQMD Rule 1166, as necessary, and implementation of standard construction practices, construction of the Project would not result in discharges that would violate any surface water quality standard or waste discharge requirements. Therefore, construction-related impacts on any surface water quality would be less than significant. No further evaluation of this topic in an EIR is required.

Operation

The City's Low Impact Development (LID) Ordinance, effective May 12, 2012, and updated in updated September 2015 (Ordinance No. 183,833), enforces the requirements of the Los Angeles County MS4 Permit. LID is a stormwater management strategy with goals to mitigate the impacts of increased runoff and stormwater pollution as close to their source as possible; and that promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. The goal of LID practices is to remove nutrients, bacteria, and metals from stormwater while also reducing the quantity and intensity of stormwater flows. Through the use of various infiltration strategies, LID is aimed at minimizing impervious surface area. Where infiltration is not feasible, the use of bioretention, rain gardens, green roofs, and rain barrels that will store, evaporate, detain, and/or treat runoff can be used.[29]

During operation, the Project would introduce sources of potential stormwater pollution that are typical of residential, office, hotel, commercial, and open space uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum in the parking and driveway areas). Stormwater runoff from rainfall could potentially carry pollutants into municipal storm drains and to the Los Angeles River, located approximately 0.5 miles to the east of the Project Site. Potential pollutants include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. The City's Low Impact Development (LID) Ordinance requires the implementation of post-construction, high-efficiency BMPs or other measures, such as infiltration, evapotranspiration, capture and reuse to prevent sediment and hazardous substances from entering stormwater flows. In order to meet LID requirements, the Project would be required to capture and treat stormwater associated with the 85th percentile storm event (the "first flush" event), which is estimated to be up to 22,400 cubic feet (cf) of stormwater from the Project Site, including up to 4,375 cf from the North Site, 16,989 cf from the South Site and 1,036 cf from the West Site.[30] In accordance with the LID Ordinance, the Project would likely install capture and use systems which may be supplemented by infiltration or bio-filtration systems. The capture and use system would temporarily store the captured stormwater until the stored volume is entirely used through irrigation on the Project Site. As the

[29] LA Sanitation and Environment, Watershed Protection Division, Planning and Land Development for Low Impact Development (LID), Part B: Planning Activities, 5th Edition, May 2016.

[30] KPFF Consulting Engineers, Fourth and Central Hydrology and Water Quality Report, December 9, 2021, page 13 (see Appendix D of this Initial Study).

majority of potential contaminants are anticipated to be contained within the "first flush," the implementation of measures required by the City's LID Ordinance would target the highest levels of pollutants in the stormwater runoff. Therefore, compliance with the LID Ordinance would ensure operation of the Project does not result in discharges that would violate any surface water quality standards or waste discharge requirements. Thus, impacts to surface water quality during operation would be less than significant. No further evaluation of this topic in an EIR is required.

Groundwater Quality

Construction

As provided in the Hydrology and Water Quality report contained in Appendix D of this Initial Study, the historic high groundwater level on the Project Site is approximately 75 feet bgs. No groundwater was encountered in the borings samples performed for the Project's geotechnical report (see Appendix B), which were drilled to a maximum depth of 100.5 feet below the existing ground surface. Therefore, is it not anticipated that groundwater would be encountered during excavation, and dewatering would not be required. However, if groundwater seepage were to occur within any of the deeper excavations, dewatering would be conducted in accordance with General NPDES Permit No. CAG994004, in which the developer must submit a Notice of Intent (NOI) to discharge groundwater generated from dewatering operations during construction in accordance with the requirements of the NPDES permit. Dewatering operations are practices that discharge groundwater that must be removed from a work location into the storm drain system to proceed with construction. Discharges from dewatering operations can contain high levels of fine sediments, which, if not properly treated, could lead to exceedance of the NPDES requirements. Temporary pumps and filtration would be utilized in compliance with the NPDES permit. If dewatering is required, the treatment and disposal of the dewatered water would, therefore, occur in accordance with the requirements of 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.[31]

Other potential effects to groundwater quality could result from the presence of a UST or during the removal of an UST. There is no record of any former or existing USTs at the Project Site. If undocumented UST's are encountered within the Project Site, materials around the USTs would be removed in accordance with SCAQMD Rule 1166 as well as Los Angeles Fire Code requirements. For example, if UST's are encountered, applicable permits would be obtained from the LAFD prior to removal and to ensure that handling and removal are carried out in accordance with applicable standards. Implementation of SCAQMD 1166 and LAFD oversight would ensure handling and removal in accordance with regulatory standards and, as such, UST's would not pose a significant hazard to groundwater quality.

The grading and excavation of contaminated soils also have the potential to impact groundwater quality. As described above, in the event that contaminated soils are encountered during construction, soils would be tested to determine the nature and extent of the contamination and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulations. In addition, Project construction activities would occur in accordance with

[31] Los Angeles Regional Water Quality Control Board (LARWQCB), Order No. R4-2018-0125, General NPDES Permit No. CAG994004, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, September 13, 2018.

City grading permit regulations. Furthermore, as part of standard construction practices, soil is routinely tested for contaminates to ensure removed soils meet the disposal requirements of the receiving C&D facility or construction site. With the removal of contaminated soils and materials, grading and excavation activities would not pose a significant hazard to groundwater quality. Therefore, construction-related impacts on groundwater quality would be less than significant. No further evaluation of this topic in an EIR is required.

Operation

The Project does not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, within an area of known groundwater contamination or seawater intrusion, in proximity to a municipal supply well, or within a spreading ground facility.

Operational activities that affect groundwater quality include spills of hazardous materials and leaking USTs. Surface spills from the handling of hazardous materials at non-industrial sites most often involve small quantities that are removed in a timely manner, thereby, resulting in little effect on groundwater. Other types of risks such as leaking UST's have a greater potential to affect groundwater. However, UST's, if encountered during construction, would be removed and, as such, would not pose a risk to groundwater during operation. No UST's would be installed as part of the Project. Therefore, operation of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirement. Operation-related impacts on groundwater quality would be less than significant. No further evaluation of this topic in an EIR is required.

b. 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. Construction activities for the Project would include demolition of the existing buildings and excavation to depths of approximately 57 feet bgs for the lowest foundations and approximately 64 bgs in isolated areas for elevator pits. The historically highest groundwater level in the area is approximately 75 feet beneath the ground surface.[32] Nonetheless, as discussed under Response Checklist Question X.a, above, although not anticipated, dewatering operations may be required temporarily in order to construct the footings and the underground structure. If dewatering is needed, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements. Any dewatering would be temporary and cease when construction is complete. Also, the Project Site contains almost entirely impervious surfaces in the existing condition and as such, the Project Site is not a material source of groundwater recharge. Furthermore, no water supply wells are located at the Project Site. Accordingly, the Project would not substantially deplete groundwater supplies in a manner that would result in a net deficit in aquifer volume or permanent lowering of the local groundwater table. Therefore, construction of 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.

[32] KPFF Consulting Engineers, Fourth and Central Hydrology and Water Quality Report, December 9, 2021, page 13 (see Appendix D of this Initial Study).

With regard to operation, as stated above, the Project Site is almost entirely impervious under existing conditions, except some small street tree wells within the public right-of-way, and the Project would develop hardscape and structures that cover most of the Project Site with impervious surfaces. Therefore, the groundwater recharge potential would remain minimal. However, the Project would include the installation of structural BMPs, which would allow for treatment of the on-site stormwater prior to the limited potential for contact with the groundwater below. Furthermore, the Project would not include the installation of water supply wells on the Project Site. Therefore, Project operation 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 would be less than significant. No further evaluation of this topic in an EIR is required.

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;

Less than Significant Impact. The Project Site is currently developed with cold storage facility/warehouse uses and paved surface parking. The channelized Los Angeles River is located approximately 0.5 miles to the east, but no streams or other natural water courses are located within the Project Site or immediate adjacent area. The Project would redevelop the Project Site, which would have the potential to alter the existing drainage patterns on the Project Site. Demolition, grading and excavation activities have the potential to expose underlying soils, modify flow direction, and cause the Project Site to be temporarily more permeable. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during rain storms. In addition, on-site watering to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed under Response Checklist Question X.a, above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering such that runoff does not impact off-site drainage facilities or receiving waters, such as the Los Angeles River. 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. Therefore, through compliance with all NPDES General Construction Permit requirements, including preparation of a SWPPP and implementation of BMPs, 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. Thus, construction-related impacts regarding erosion or siltation would be less than significant. No further evaluation of this topic in an EIR is required.

The Project Site is currently approximately 97 percent impervious, which limits the potential for erosion or siltation to occur on the Project Site.[33] At buildout, the Project Site would have 85.37 percent impervious surfaces.[34] As such, there would be a decrease in the imperviousness of the Project Site. As analyzed in the Hydrology and Water Quality Report, under the Project's

[33] KPFF Consulting Engineers, Fourth and Central Hydrology and Water Quality Report, December 9, 2021, page 4 (see Appendix D of this Initial Study).

[34] KPFF Consulting Engineers, Fourth and Central Hydrology and Water Quality Report, December 9, 2021, page 12 (see Appendix D of this Initial Study).

proposed conditions, the Project Site would consist of four drainage areas (A through D) that would convey stormwater via building roof drains, area drains, surface flow to the proposed BMPs. Under a 5-year storm event, the Q50 representing the volumetric flow rate measured in cubic feet per second (cfs) would be 24.13 cfs. The V50 representing the volume of flow measured in cubic feet would be 130,771 cf. **Table 4-1**, *Pre- and Post-Project 50-Year Frequency Peak Flow Rates for Project Area,* summarizes the existing and post-Project 50-year design storm event peak flow rates from the Project Site. The Project would decrease the 50-year peak flow rate from the entire Project Site by 0.58 percent. In addition, the Project would improve current conditions by capturing and treating the 85th percentile storm, and thus reducing the peak flow of the stormwater discharged to the public infrastructure. **Table 4-2**, *Pre- and Post-Project 50-Year 24-Hour Volume Flow for Project Area,* summarizes the existing and post-Project 50-year design storm event 24-hour volumetric flows from the Project Site. The Project would decrease the 50-year flow volume from the entire Project Site, and the Project would improve current conditions by capturing and treating the 85th percentile storm, thus decreasing the volume of the stormwater discharged to the public infrastructure. The Hydrology and Water Quality Report concluded that the Project would not cause flooding, would not create runoff volumes that could exceed the capacity of existing infrastructure, or require the construction of new stormwater infrastructure to accommodate post-Project hydrology conditions in either normal or peak stormwater scenarios.[35] Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion, siltation, or on-site or off-site flooding would occur. Operational impacts to hydrology would be less than significant. No further evaluation of this topic in an EIR is required.

Table 4-1
Pre- and Post-Project 50-Year Frequency Peak Flow Rates for Project Area

Drainage Area	Project Site Area (Acres)	Pre-Project Q50 (cfs) (volumetric flow rate measured in cubic feet per second)	Post-Project Q50 (cfs) (volumetric flow rate measured in cubic feet per second)	Decrease from Existing to Proposed Condition (%)
Entire Site	7.66	24.27	24.13	0.58%

SOURCE: KPFF Consulting Engineers, Fourth and Central Hydrology and Water Quality Report, dated December 9, 2021.

Table 4-2
Pre- and Post-Project 50-Year 24-Hour Volume Flow for Project Area

Drainage Area	Project Site Area (Acres)	Pre-Project V50 (cf) (volumetric flow measured in cubic feet)	Post-Project V50 (cf) (volumetric flow measured in cubic feet)	Estimated Low Impact Development Treatment Volume (volumetric flow measured in cubic feet)	Decrease from Existing to Proposed Condition (%)
Entire Site	7.66	146,351	130,771	22,400	26.0%

SOURCE: KPFF Consulting Engineers, Fourth and Central Hydrology and Water Quality Report, dated December 9, 2021.

[35] KPFF Consulting Engineers, Fourth and Central Hydrology and Water Quality Report, December 9, 2021, page 14 (see Appendix D of this Initial Study).

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. There are no streams or rivers that cross the Project Site. As previously discussed, construction activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. As discussed above in Response to Checklist Question X.a, the Project would implement a SWPPP that specifies BMPs and erosion control measures used during construction to manage runoff flows. These BMPs are 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. Thus, through compliance with all NPDES General Construction Permit requirements and compliance with applicable City grading permit regulations, construction activities for the Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. As such, construction-related impacts to hydrology would be less than significant. No further analysis of this topic in an EIR is required.

As previously discussed, the Project Site is currently approximately 97 percent impervious, which limits the potential for erosion or siltation to occur on the Project Site. At buildout, the Project Site would have 85.37 percent impervious areas. With the increase in permeability, there would be decrease in the amount of surface runoff. These decreases are shown in the pre- and post-Project 50-year peak flow rates and volumes in Table 4-1 and Table 4-2, respectively. In addition, as the Project Site does not currently have BMPs for the management of runoff, the Project's BMPs would further reduce stormwater runoff and decrease the amount of stormwater runoff discharging into the existing storm drain system. The Hydrology and Water Quality Report concluded that the Project would not cause flooding, would not create runoff volumes that could exceed the capacity of existing infrastructure, or require the construction of new stormwater infrastructure to accommodate post-project hydrology conditions. Flows would be accommodated by the existing stormwater treatment and conveyance system. Therefore, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- and off-site. Project impacts would be less than significant. No further evaluation of this topic in an EIR is 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, the Project would result in a decrease in imperviousness of the Project Site and, as such, a decrease in storm water runoff.

Flows would be accommodated by the proposed stormwater treatment and conveyance system. In addition, the implementation of BMPs required by the City's LID Ordinance would target the pollutants that could potentially be carried in stormwater runoff. Therefore, with the incorporation of LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. In addition, the Hydrology and Water Quality Report concluded that the Project would not cause flooding during the 50-year developed storm event and would not create runoff volumes that could exceed the capacity of existing

infrastructure.[36] Thus, Project impacts would be less than significant. No further evaluation of this topic in an EIR is required.

iv. Impede or redirect flood flows?

No Impact. The Project Site is not located within a Special Flood Hazard Area (100-year floodplain) or Moderate Flood Hazard Area (500-year floodplain) identified by the Federal Emergency Management Agency (FEMA) and published in the Flood Insurance Rate Maps (FIRM).[37] The Project Site is located in an urbanized area and there are no rivers, streams, or other water bodies (natural or urban) that could flood flow on or through the Project Site. Therefore, the Project would not impede or redirect flood flows. No impacts would occur and no further analysis of this topic in an EIR is required.

d. In flood hazard, tsunami, or seiche zones, 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 designated by FEMA. As such, the Project Site is not at risk of inundation from flooding.

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. Mudflows occur as a result of downslope movement of soil and/or rock under the influence of gravity.

The Project Site is located in an area of relatively flat topography and urban development, with no enclosed bodies of water upstream of the Project Site, and as such, there is no potential for inundation resulting from a seiche or mudflows. Although the Los Angeles River is located approximately 0.5 miles east of the Project Site, the river in this area is located within a sunken concrete-lined channel at several feet below the ground elevation of the Project Site, and any seiches that could potentially develop within this stretch of the river during an earthquake would not have the potential to inundate the Project Site. With respect to tsunami hazards, the Project Site is located approximately 14 miles inland (east-northeast) from the Pacific Ocean, and therefore would not be subject to a tsunami. Furthermore, the Project Site is not located in a designated tsunami hazard area by the California Department of Conservation.[38] Therefore, there would be less than significant impact with regard to risk of release of pollutants due to inundation of the Project Site. No further analysis of this topic in the EIR is required.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact. 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 Los Angeles Regional Water Quality Control Board (LARWQCB) prepares a list of impaired waterbodies in the

[36] KPFF Consulting Engineers, Fourth and Central Hydrology and Water Quality Report, December 9, 2021, page 14 (see Appendix D of this Initial Study).

[37] Los Angeles County Department of Public Works, Flood Zone Determination Website, FIRM Panel 06037C1636G, available at: https://pw.lacounty.gov/floodzone/. Accessed May 18, 2021.

[38] California Department of Conservation, Los Angeles County Tsunami Hazard Areas website: https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles. Accessed December 7, 2021.

region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutants for which it is impaired. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). As discussed in the Hydrology and Water Quality Report, the Project Site is located within the Los Angeles River Watershed Reach 2. 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 TDML milestones. The objective of the EWMP is to determine the network of control measures (generally referred to as BMPs) that will achieve required pollutant reductions while also providing multiple benefits to the community and leveraging sustainable green infrastructure practices. The Project Site falls within the Los Angeles River EWMP and ultimately discharges into the Pacific Ocean at San Pedro Harbor. The Los Angeles River is impaired by pollutants (i.e., trash, metals, bacteria, nutrients) mainly because of the watershed's large, dense population and the amount of impervious ground surface that prevents large quantities of runoff from infiltrating into the soils.[39] Constituents of concern listed for the Los Angeles River Reach 2 under California's Clean Water Act Section 303(d) list include ammonia, copper (dissolved), lead, algae, oil, bacteria, and trash.[40]

Potential pollutants generated by the Project would be typical of residential, hotel, office, retail/restaurant, and open spaces uses, including nutrients, pathogens, pesticides, trash and debris, oils and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could be carried in stormwater runoff. Since the existing Project Site does not have any structure or LID BMPs to treat or infiltrate stormwater, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff compared to existing conditions. The Project's LID design also includes capture and use of surface water, which may be supplemented by infiltration or bio-filtration systems. The capture and use system would temporarily store the captured surface water until the stored volume is entirely used through irrigation on the Project Site and, as such, stormwater would not be discharged into the storm drain system or groundwater table.

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. No further evaluation of this topic in an EIR is required.

[39] City of Los Angeles, Department of Sanitation website: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-wp/s-lsh-wwd-wp-ewmp/s-lsh-wwd-wp-ewmp-lar?_afrLoop=10440279847898088&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=rb26xh64s_1#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D10440279847898088%26_afrWindowMode%3D0%26_adf.ctrl-state%3Drb26xh64s_5, Accessed November 23, 2021.

[40] KPFF Consulting Engineers, Fourth and Central Hydrology and Water Quality Report, December 9, 2021, page 5 (see Appendix D of this Initial Study).

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?	☐	☐	☒	☐
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. Physically divide an established community?

Less Than Significant Impact. A significant impact may occur if a project is sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community). The Project Site is located in a highly urbanized and heterogeneous area of the City. The Project would be constructed entirely within the bounds of the Project Site and contained within the existing developed blocks bounded by 4th Street, Central Avenue, Alameda Avenue and Gladys Avenue all of which have existing public rights-of-way. The Project would not encroach into adjacent streets or require vacations of streets or changes in the City's circulation system that would divide an established community. Existing transportation infrastructure (e.g., transit routes and stops, streets and highways, and pedestrian and bicycle facilities) would not be altered as a result of the Project. The Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. Additionally, the Project Site is surrounded by existing developed uses. The Project would be an infill project providing uses in keeping with the development of recent mixed-use projects in the surrounding area. As such, the Project would not constitute a physical barrier separating an established community. Thus, Project impacts would be less than significant, and no further analysis of this topic in the EIR is required.

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?

Potentially Significant Impact. The Project Site is located within the Central Community Plan area, which designates the Project Site for Light Industrial land uses. The Project Site is zoned M2-2D-O on the North Site and M2-2D on the South and West Sites. This zoning permits a range of industrial uses prevalent in the area such as warehouses and cold storage facilities, and also permits commercial and office uses. The "2D" indicates Height District 2D, which does not limit the height of buildings on these properties, but would limit the FAR to 3:1. The "O" designation indicates that the Project Site is located within an oil drilling district where the drilling of oil wells or the production from wells of oil, gas, or other hydrocarbon substances is permitted.

The Project Site is also located within a State Enterprise Zone (City of Los Angeles Department of City Planning Zoning Information [ZI] No. 2374) and Greater Downtown Housing Incentive Area (City of Los Angeles Department of City Planning ZI No. 2385), which were both established to stimulate local investment. State Enterprise Zones provide business owners within the Zone boundaries with state incentives such as tax credits and deductions for hiring eligible employees, credits for sales and use taxes paid on qualifying machinery and electronic equipment, additional business expense deductions, and credits to lenders for loans made to Enterprise Zone businesses. The Greater Downtown Housing Incentive Area was created to incentivize housing development within the boundaries of the area.

The Project's requested discretionary actions that would have potential land use effects include a General Plan Amendment to re-designate the underlying land use from Light Industrial to Regional Commercial; a Vesting Zone Change and Height District Change to change the zone from M2-2D/M2-2D-O to C2-2; Affordable Housing Development Incentives under Measure JJJ to allow an increase in FAR to 6.95:1; and a Vesting Tentative Tract Map to merge existing lots and re-subdivide into four ground lots and twenty-six air space lots for commercial and residential purposes. While the Project would not be anticipated to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigation an environment effect, an evaluation of the effects of the Project's requested entitlements, as well as an evaluation of the Project's compliance with other applicable regional and local plans, policies, and regulations, will be provided in the EIR.

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

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

Less Than Significant Impact (a–b). The Project Site is located in an area containing mineral deposits related to existing, adjacent oil fields.[41] The presence of oil extraction activities in the

[41] City of Los Angeles Department of City Planning, Los Angeles General Plan Conservation Element, Exhibit A, Mineral Resources, March 2001.

area is indicated by the Project's North Site location within the "O" Oil Drilling Zone. Based on a review of the Geologic Energy Management Division (CalGEM) [formerly the Division of Oil, Gas, and Geothermal Resources (DOGGR)] online Well Finder mapping system, the Project Site is within the Union Station Oil Field, but no oil or gas wells occur on the Project Site, and no historic or current oil extraction operations have occurred or currently occur on the Project Site.[42] While development of the Project Site under the Project does not include any oil wells, no change in oil extraction would occur compared to existing and past conditions on the Project Site. Access to oil within the greater Union Station Oil Field would not be precluded by development under the Project. It is also acknowledged that with implementation of new methodologies, such as slant drilling, oil extraction capabilities and exploratory operations below developed parcels, such as the Project Site, would not be substantially reduced by development of the of the Project Site.

Therefore, Project implementation would not result in the loss of availability of a known mineral resource of value to the region and residents of the state, nor of a locally important mineral resource recovery site. Less than significant impacts to mineral resources would occur and no further analysis of this topic in the EIR is required.

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?	☒	☐	☐	☐
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 2 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?	☐	☐	☐	☒

[42] CalGEM Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.23565/34.04355/17, accessed June 21, 2021.

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?

Potentially Significant Impact. Construction of the Project would require the use of heavy construction equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) that would generate noise on an intermittent, short-term basis. Additionally, operation of the Project may increase existing noise levels as a result of Project-related traffic and operational on the Project Site. As such, nearby noise-sensitive uses could potentially be affected. Therefore, the EIR will provide further evaluation of the Project's potential to generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project Site in excess of applicable standards.

b. Generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Construction of the Project may generate groundborne vibration and noise due to site grading, clearing activities, and haul truck travel. In addition, construction of the Project may require pile-driving, which could involve repetitive, high impact methods that could create both groundborne noise and vibration. As such, the Project would have the potential to generate or to expose people to excessive groundborne vibration and noise levels during short-term construction activities. Therefore, the EIR will provide further evaluation of construction-related, groundborne noise and vibration levels.

Once construction is complete, Project operation would not generate excessive groundborne vibration or groundborne noise. Minor vibration levels could be generated from mechanical rooftop equipment (i.e., heating, ventilation, and air conditions or "HVAC" equipment) and delivery trucks traveling on local roadways to and from the Project Site. However, vibration levels diminish rapidly with increasing distance from a vibration source and Project operation would not generate groundborne vibration or groundborne noise at levels beyond those which currently exist in an urbanized setting and would not have the potential to expose people to excessive groundborne vibration or groundborne noise, resulting in a less than significant impact. Therefore, no further analysis of operational groundborne vibration or groundborne noise in the EIR is 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 an airport land use plan, is not within 2 miles of a public airport or public use airport, nor is it within the vicinity of a private airstrip. The nearest airports to the Project Site are the Hawthorne Municipal Airport and LAX located approximately 10 and 10.5 miles, respectively, from the Project Site. Therefore, there would be no impacts to a private airstrip, a public airport, nor an airport land use plan. No further analysis of this topic in the EIR is required.

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. 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)?

Potentially Significant Impact. The Project Site is located within the jurisdiction of SCAG, a Joint Powers Agency established under California Government Code Section 6502 et seq. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. In September 2020, SCAG's Regional Council adopted the 2020-2045 RTP/SCS, known as "Connect SoCal" Connect SoCal presents the transportation vision for the region through the year 2045 and provides a long-term investment framework for addressing the region's transportation and related challenges. Connect SoCal further sets forth projections of population, households, and employment through 2045 in accordance with subregional, and local jurisdictional growth projections.

The Project, which anticipates 1,521 residential units, 401,101 sf of office floor area, 93,100 sf of restaurant/retail floor area, and 68 hotel rooms, would increase the population in the Project vicinity through construction of new residential units and creation of new employment opportunities. Because population, housing, and employment increases that would be associated with the Project, this topic will be evaluated in the EIR to determine potential impacts related to physical impacts on the environment associated with the Project's contribution to growth in relation to SCAG's regional and local forecasts.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. No dwelling units are currently located on the Project Site. Because no housing would be displaced, the construction of replacement housing elsewhere would not be necessary. No impact would occur and further analysis of this topic in the EIR is required.

XV. PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	☒	☐	☐	☐
b. Police protection?	☒	☐	☐	☐
c. Schools?	☒	☐	☐	☐
d. Parks?	☒	☐	☐	☐
e. Other public facilities?	☒	☐	☐	☐

a. Fire protection?

Potentially Significant Impact. The LAFD provides fire protection and emergency medical services in the City. The Project Site is located in the service area of LAFD Station No. 9 (Central City Fire Station), located at 430 E. 7th Street. The service area for Station No. 9, which is located approximately 0.7 miles to the southwest of the Project Site, extends to approximately 4th Street and Alameda Avenue at the Project Site.[43] The Project Site is also located at the edge of the service area for Station No. 4 (Little Tokyo/Olvera Street/Chinatown Fire Station), located at 450 E. Temple Street. The service area for Station No. 4, which is located approximately 0.5 miles to the north of the Project Site, extends to approximately 4th Street and Alameda Avenue across the street from the Project Site. Three other fire stations are located in the Project Site vicinity, including Fire Station No. 17 (the Industrial East Side Station) at 1601 S. Santa Fe Avenue (approximately 1.5 miles south of the Project Site); Fire Station No. 2 (the Boyle Heights Station) at 1962 E. Cesar Chavez Avenue (approximately 1.8 miles east of the Project Site); Fire Station No. 10 (the Convention Center District Station) at 1335 S. Olive Street (approximately 2.0 miles to the southwest of the Project Site.

Because the Project would introduce ten new buildings, including high-rise structures, and increase the population and overall occupancy of the Project Site, it would increase demand on LAFD services and facilities that could result in the need for new or physically altered facilities to maintain service. Therefore, this topic will be evaluated in the EIR to provide further evaluation of the Project's potential impacts on fire protection services.

[43] City of Los Angeles Fire Department, Find Your Station, available at: https://www.lafd.org/fire-stations/station-results. Accessed May 28, 2021.

b. Police protection?

Potentially Significant Impact. The Los Angeles Police Department (LAPD) provides police protection services in the City of Los Angeles. The LAPD is divided into four Police Station Bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. Each of the Bureaus encompasses several communities. The Project Site is located in LAPD's Central Bureau, which serves Central, Hollenbeck, Newton, Northeast and Rampart, as well as the Central Traffic Division.[44]

Specifically, the Project Site is served by the Central Community Police Station located at 251 E. 6th Street, approximately 0.4 miles west of the Project Site. Because the Project's 1,521 residential units, offices, retail/restaurant uses, and hotel use would substantially increase the occupancy of the Project Site, it would increase demand on LAPD police protection services and demand on LAPD facilities. This increase could potentially result in the need for new or physically altered governmental facilities to maintain acceptable service ratios or other performance objectives. Therefore, the EIR will provide further evaluation of the Project's potential impacts on police protection services.

c. Schools?

Potentially Significant Impact. The Project Site is located within the jurisdiction of the LAUSD, and specifically within LAUSD's East (middle school) and Central Local District (elementary and high schools). The Project Site is within the attendance boundaries of the 9th Street Elementary School (grades K-5), Hollenbeck Middle School (grades 6-8), and Belmont Senior High (grades 9-12).[45] The Project, which proposes the development of 1,521 residential units, would increase the residential population of the area and increase demand on LAUSD schools. This topic will be evaluated in the EIR to provide further evaluation of potential impacts to public school services.

d. Parks?

Potentially Significant Impact. Public park services are provided to the City by the City's Department of Recreation and Parks. In addition to regional parks, such as Griffith Park, the Department of Recreation and Parks provides local and neighborhood parks throughout the City of Los Angeles. The nearest public parks to the Project Site are local parks and include the 6th and Gladys Park, located at 808 E. 6th Street approximately 0.1 mile to the west of the Project Site; the Arts District Park, located at 501 S. Hewitt, approximately 0.2 miles to the east-southeast of the Project Site; the Aliso Pico Park, located 370 S. Clarence Street approximately 0.2 miles to the southwest of the Project Site; the Arts District Dog Park, located at 1004 E. 4th Street approximately 0.3 miles to the east of the Project Site, the San Julian Park, located at 312 E. 5th Street approximately 0.3 miles to the west of the Project Site; and the Pecan Recreation Center, located at 1455 Pecan Street approximately 0.9 miles to the east of the Project Site.

At the state level, the Quimby Act (part of the California Subdivision Map Act), authorizes a city or county legislative body to require the dedication of land or to impose fees for park or recreational purposes as a condition of the approval of a tentative or parcel subdivision map, if specified requirements are met. In addition, the City includes a Parks Dedication and Fee Update

[44] Los Angeles Police Department, About Central Bureau, https://www.lapdonline.org/central_bureau/content_basic_view/1908. Accessed May 28, 2021

[45] Los Angeles Unified School District, Resident School Finder. Available at: https://rsi.lausd.net/ResidentSchoolIdentifier/. Accessed May 28, 2021.

ordinance (Ordinance 184,505) which requires most residential projects that create new dwelling units or joint living and work quarters to dedicate land or to pay a fee for the purpose of developing park and recreational facilities. Residential projects that propose one or more additional dwelling units will be subject to the Park Fee. Nonetheless, because the Project's 1,521 residential units and other uses substantially increase the occupancy of the Project Site, it would increase demand on park services and facilities. This increase could potentially result in the need for new or physically altered governmental facilities to maintain acceptable service ratios or other performance objectives. Therefore, this topic will be evaluated in the EIR to provide further evaluation of potential impacts to public park services.

e. Other Public Facilities?

Potentially Significant Impact. The Los Angeles Public Library provides library services to the City. Because the Project would introduce new residents to the Project Site, demand on library services could increase. Therefore, this topic will be evaluated in the EIR to provide further analysis of potential impacts associated with library services.

During construction and operation of the Project, other governmental services, including roads, would continue to be utilized. Project residents, employees, hotel visitors and guests would use the existing road network, without the need for new roadways to serve the Project Site. The Project would result in an increase in the number of vehicle trips attributable to the Project Site. However, the additional use of roadways would not be excessive and would not necessitate the upkeep of such facilities beyond normal requirements. Therefore, the Project would result in less than significant impacts on other governmental services besides LAPL library services. No further analysis of this topic in the EIR is 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?	☒	☐	☐	☐
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?

Potentially Significant Impact. As discussed in the Response to Checklist Question XV.d above, because the Project would introduce new population to the Project Site, greater demand on existing public recreational and park facilities and services in the Project vicinity could be

generated. Therefore, this topic will be evaluated in the EIR to determine potential impacts associated with deterioration of existing neighborhood and regional parks or recreation facilities.

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

Potentially Significant Impact. The Project would provide on-site recreational facilities and require the construction of such recreational facilities. In addition, the project would substantially increase the occupancy of the Project Site and, therefore, would potentially require the expansion of off-site recreational facilities, as discussed above in Response to Checklist Question XV.d, above. Although the Project, would pay required Quimby Fees included as part of a Vesting Tentative Tract Map, the construction of on- or off-site recreational facilities has the potential to have an adverse physical effect on the environment. As such, this topic will be evaluated in the EIR to determine potential impacts related to the construction of recreation facilities.

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. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.63, 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?	☐	☐	☒	☐

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Potentially Significant Impact. Construction activities, such as street realignments, installation of new sidewalks, hauling of demolition and excavated materials, and installation of utilities within existing roadways, have the potential to impact circulation within roadways, bicycle, and pedestrian facilities. During operation, the occupancy and vehicle use associated with the Project would affect the circulation system, including roadway, bicycle, and pedestrian facilities. Therefore, further analysis of this topic, including mass transit and non-motorized travel, will be provided in the EIR.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.63, subdivision (b)?

Potentially Significant Impact. SB 743, which went into effect in January 2014, requires the Governor's Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis has shifted from driver delay, which is typically measured by traffic level of service (LOS), to a new measurement that better addresses the state's goals on reduction of greenhouse gas emissions, creation of a multi-modal transportation, and promotion of mixed-use developments. CEQA Guidelines Section 15064.3 states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts, replacing LOS.

On July 30, 2019, the City adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its Transportation Assessment Guidelines (July 2019), which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743. The Transportation Assessment Guidelines were updated in July 2020.

The Project would develop new commercial, office, hotel and residential uses on the Project Site. As a result, VMT would increase over existing conditions. Therefore, further analysis of this topic will be provided in the EIR.

c. 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. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. The Project Site is located in a highly urbanized area 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 LADBS, 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.

Vehicle access to the North Site would be provided via driveways along Central Avenue at the northwest corner of the North Site and 4th Street at the southeast corner of the North Site. An approximately 29-foot-wide internal drive aisle would connect the two driveways and would also provide access to the parking podium and subterranean levels at Building 2 along the north side of the North Site. Loading docks and delivery truck access from the internal drive aisle would also be located at Building 2, at the east side of the North Site. Access driveway locations and dimensions are illustrated above in Figures 3-7 and Figure 3-8, respectively.

Vehicle access to the South Site would be provided via one driveway along Alameda Street and two driveways along Central Avenue. The northerly Central Avenue driveway and Alameda Street driveway would be connected by an internal east-west drive aisle. The internal drive aisle would provide access to the subterranean parking structure at Building 4. The southerly driveway along Central Avenue would provide access to the parking podium and subterranean levels at Building 9. The driveway locations are illustrated in Figure 3-7. All project buildings and driveways would be designed to meet applicable City standards for setbacks to preserve view corners at driveways and intersections.

In addition, the Project would not result in incompatible uses as the proposed uses are consistent with the types of uses already present in the surrounding area. Thus, impacts related to increased hazards due to a design feature or incompatible use would be less than significant, and no further analysis of this topic in the EIR is required.

d. Result in inadequate emergency access?

Less Than Significant Impact. This threshold reviews whether or not a project's elements would have a detrimental effect on emergency vehicle response times. The Project Site is located in an established urban area that is well served by the surrounding roadway network. Emergency vehicular access to the Project Site would be maintained from all roadways surrounding the Project, including 4th Street, Alameda Street and Central Avenue. The City's General Plan Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, or disaster routes, along with the location of selected emergency facilities. Alameda Street and 4th Street are designated as emergency/disaster routes adjacent to the Project Site.[46]

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, both directions of travel would continue to be maintained in accordance with standard construction traffic management plans that would be implemented to ensure adequate circulation and emergency access.

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 both during construction as well as after completion of the Project. 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. The Project also would not include the installation of barriers that could impede emergency vehicle access both during and operation. Drivers of emergency vehicles are also trained to utilize center turn lanes, or travel in opposing through lanes (on two- way streets) to pass through crowded intersections or streets. Accordingly, the respect entitled to emergency vehicles and driver training allows emergency vehicles to negotiate typical street conditions in urban areas. As such, emergency access to the Project Site and surrounding area would be maintained both during Project construction and operation. Therefore, the Project would not result in inadequate emergency access during construction or operation, and, as such, impacts to emergency access during construction and operation of the Project would be less than significant. No further analysis of this topic in the EIR is required.

[46] City of Los Angeles, Safety Element of the Los Angeles City General Plan, Critical Facilities and Lifeline Systems, Exhibit H, November 1996.

XVIII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), 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.	☒	☐	☐	☐

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?

Potentially Significant Impact (a–b). Approved by Governor Brown on September 25, 2014, Assembly Bill (AB) 52 establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to tribal cultural resources, as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in AB 52, lead agencies must provide notice to tribes that

are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Any information gained during the consultation process will be used to analyze impacts to tribal cultural resources in the EIR. The existence of tribal cultural resources on the Project Site is currently unknown; as such, further analysis of this topic will be provided in the EIR to determine the potential for, and significance of, the Project's impacts on tribal cultural resources.

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?	☒	☐	☐	☐
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. 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. A Utility and Infrastructure Report will be prepared to evaluate water and wastewater demand and the ability for existing water and sewer infrastructure and treatment facilities to serve the Project. Given the Project's proposed increase in population and developed floor area, the potential of the Project to result in the construction of new water or wastewater infrastructure or treatment facilities will be analyzed in the EIR.

As discussed above in Response to Checklist Question X.c, a Hydrology and Water Quality Report (see Appendix D of this this Initial Study) has been prepared to evaluate the change in drainage patterns that would occur with Project implementation. As discussed in Response to Checklist Question X.c, the Hydrology and Water Quality Report concluded that the Project would not create runoff volumes that could exceed the capacity of existing infrastructure, or require the construction of new stormwater infrastructure to accommodate post-Project hydrology conditions in either normal or peak stormwater scenarios.

With regard to electric power and natural gas facilities, given the Project's proposed increase in population and developed floor area, the potential of the Project to result in the construction of new electric or natural gas facilities will be analyzed in the EIR.

With regard to telecommunications facilities, the Project would require construction of new on-site telecommunications infrastructure to serve new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction 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 further evaluation regarding telecommunications in an EIR is required.

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Potentially Significant Impact. Given the increased development that would occur on the Project Site, the Project would increase water demand beyond existing conditions. Sections 10910-10915 of the State Water Code (Senate Bill [SB] 610) requires the preparation of a water supply assessment (WSA) demonstrating sufficient water supplies for a project that is: 1) a shopping center or business establishment that will employ more than 1,000 persons or have more than 500,000 sf of floor space; 2) a commercial office building that will employ more than 1,000 persons or have more than 250,000 sf of space, or 3) any mixed-use project that would demand an amount of water equal to or greater than the amount of water needed to serve a

500-dwelling unit subdivision. A WSA will be required for the Project as it is anticipated that the Project would result in a net increase in water use that is greater than the amount of water needed to serve a 500-unit residential development. This topic will be further analyzed in the EIR in order to assess projected water demand and the sufficiency of current water supplies.

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?

Potentially Significant Impact. A Utility and Infrastructure Report will be prepared to evaluate wastewater demand and the ability for existing sewer infrastructure and treatment facilities to serve the Project. Given the Project's proposed increase in population and developed floor area, the potential of the Project to result in the construction of new water or wastewater treatment facilities will be analyzed in the EIR.

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?

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

The proposed mix of uses would generate solid waste during Project construction and operation. Disposal would occur pursuant to City ordinances that require the use of certified haulers and implementation of practices to recycle exported materials. However, the Project would increase demand on the region's remaining landfill capacity and would be required to demonstrate consistency with policies to divert waste from landfills and increase waste recycling. Therefore, this topic will be evaluated in the EIR to determine impacts associated with sufficient capacity of landfills.

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. 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?

No Impact (a–d). The Project Site is located in an urbanized area with no natural vegetation. There are no state responsibility areas or lands classified as Very High Fire Hazard Severity Zones on or near the Project Site.[47] Therefore, no impact regarding wildland fires would occur, and no further analysis of these topic in the EIR is required.

[47] City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org, accessed May 28, 2021

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?

Potentially Significant Impact. The Project would not substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal. With regard to potential construction impacts on protected nesting birds, consistency with provisions in the MBTA would avoid disturbance of nest birds and would protect nesting birds if they are present on-site during construction.

However, as discussed in this Initial Study, the Project has the potential to result in significant impacts with respect to historic resources. Therefore, the EIR will further analyze whether the Project would have a significant impact on historic resources and whether the Project would eliminate important examples of the major periods of California history.

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

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

Each of the topics determined to have the potential for significant impacts in this Initial Study will be subject to further evaluation in the EIR, including evaluation of the potential for cumulatively significant impacts. Topics for which Initial Study determinations were "No Impact" or "Less Than Significant Impact" have been determined not to have the potential for significant cumulative impacts, as discussed below.

As analyzed above, the Project would not have a significant impact on aesthetic resources pursuant to PRC Section 21099(d)(1) and ZI No. 2452. In addition, related projects would be reviewed on a case-by-case basis by the City to comply with the 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. Therefore, Project's contribution to aesthetics impacts would not be cumulative considerable. Thus, cumulative impacts would be less than significant.

As indicated in the impact analysis for the Project, the Project Site is located in a highly urbanized area and is currently developed with cold storage facility/warehouse uses and paved surface parking. No agricultural or forestry uses are located on the Project Site. In addition, the Project Site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the Farmland Mapping and Monitoring Program, is not zoned for agriculture or forestry use, and is not under a Williamson Act contract. The same is likely true of related projects given their location within urbanized areas. However, even if some of the related projects are exceptions to the above, the Project would not convert farmland, forest land, or designated Farmland, would not conflict with existing zoning for agricultural or forestry use, and would not conflict with a Williamson Act contract. Therefore, the Project's contribution to agricultural and forestry resources would not be cumulatively considerable. Therefore, cumulative impacts would be less than significant.

The Project would have a less than significant impact related to emissions of odors. It is anticipated that the related projects in the surrounding area would not be uses associated with major odor producing uses such as manufacturing, smelting, food packaging, and other industrial uses. Related projects would be subject to compliance with applicable SCAQMD regulations regarding odor control. Thus, with compliance to applicable regulatory requirements and site-specific mitigation, as necessary, the Project's contribution to odor impacts would not be cumulatively considerable. Thus, cumulative impacts would be less than significant.

With respect to Biological Resources, the Project would be consistent with the MBTA as stated under Response to Checklist Question IV.d, which would ensure that potential impacts to nesting birds would be reduced to a less than significant level. Impacts to sensitive plant and animal species would not be cumulatively considerable, as no such habitat occurs in the vicinity of the

Project Site or related projects due to the existing urban development. Biological resources are generally site-specific and need to be evaluated within the context of each individual project. Furthermore, related projects would be required to comply with existing regulatory requirements and the City's building permit review and approval process, which address these subjects. Thus, with compliance to these regulatory requirements and site-specific mitigation, as necessary, the Project's contribution to biological resources impacts would not be cumulatively considerable. Thus, cumulative impacts would be less than significant.

As analyzed above, the Project would result in less than significant impacts to geology and soils (excluding paleontological resources). 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. Therefore, as with the Project, related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. While cumulative development would expose a greater number of people to seismic hazards, as with the Project, related projects would be subject to local, state, and federal regulations and standards for seismic safety. Thus, with compliance to these regulatory requirements and site-specific mitigation, as necessary, the Project's contribution to geology and soils impacts would not be cumulatively considerable. Thus, cumulative impacts would be less than significant.

With regard to hazards to the public or the environment, related projects would have the potential for significant impacts from hazardous emissions, being located on a hazardous materials site, or from the accidental release or through the routine transport, use, or disposal of hazardous materials. However, as with the Project, related projects would be required to use and store all potentially hazardous materials in accordance with the manufacturers' instructions and handle materials in accordance with federal, state, and local health and safety standards and regulations. Like for the Project, compliance with existing standards and regulations would ensure that the related projects would not result in significant impacts to the public or the environment from hazardous emissions, accident conditions or the routine transport, storage, use, disposal, or handling of hazardous materials. In addition, as with the Project, related projects would also be subject to CEQA review, prepare hazardous materials documentation (i.e., Phase I ESA), and include the identification of mitigation measures as necessary to address any hazardous materials concerns. Thus, with compliance to applicable regulatory requirements and site-specific mitigation, as necessary, the Project's contribution to hazardous materials impacts would not be cumulatively considerable. Thus, cumulative impacts in this regard would be less than significant.

Because the Project Site is not located within the vicinity of a private airstrip or an airport land use plan or within 2 miles of a public airport or public use area, the Project's contribution to cumulative impacts with regard to safety hazards or exposing people residing or working in the Project area to excessive noise levels would not be cumulatively considerable. Thus, cumulative impacts in this regard would be less than significant.

The related projects would potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff within the local vicinity of the Project Site. However, as with the Project, the related projects are located within the highly urbanized areas, which are largely characterized by existing buildings and paved surfaces with limited landscaped areas. Accordingly, the potential to generate a notable amount of new impermeable surfaces is limited. Pursuant to the City's LID stormwater requirements, related projects would be required to capture and treat runoff flow during storm events similar to the Project. Further, the related projects would be subject to State NPDES permit requirements for both construction and operation. Each project

greater than one-acre in size would be required to develop a SWPPP and would be evaluated individually to determine appropriate BMPs and treatment measures to avoid or minimize impacts to water quality. Smaller projects would be minor infill projects with drainage characteristics similar to existing conditions, with negligible impacts. In addition, the City of Los Angeles Department of Public Works reviews all construction projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available. Thus, compliance with applicable regulatory requirements would avoid significant impacts on hydrology/drainage/flooding conditions and the quality of water reaching the public drainage system. Cumulative impacts to hydrology and water quality would not be cumulatively considerable and cumulative impacts would be less than significant.

With regard to impacts related to groundwater supplies, as with the Project, related projects are expected to be generally located within highly urbanized areas, which are largely characterized by existing buildings and paved surfaces with limited landscaped areas. Regardless, the Project's recharge potential will remain minimal compared to existing conditions. Accordingly, the Project's contribution to groundwater supply or recharge impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

Also, related projects could potentially result in an increase in pollutants due to inundation in flood hazard areas. However, as with the Project, related projects would be subject to the City's LID requirements and, for applicable projects, NPDES permit requirements, including development of SWPPPs for construction projects greater than 1 acre, compliance with SUSMP requirements during operation, and compliance with other local requirements pertaining to hydrology and surface water quality. It is anticipated that related projects would also be evaluated on an individual basis by the City Department of Public Works to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to hydrology and water quality. As such, the Project's contribution to impacts associated with increases in pollutants due to inundation in flood hazard areas would not be cumulatively considerable. Thus, cumulative impacts would be less than significant.

Impacts regarding physically dividing a community is site specific, and because the Project would have a less than significant impact on this topic, the Project's contribution would not be cumulatively considerable. Therefore, cumulative impacts would be less than significant.

The Project would not displace any existing people or housing, and thus would not necessitate the construction of replacement housing elsewhere. Thus, the Project's contribution would not be cumulatively considerable. Thus, cumulative population/housing impacts related to the displacement of housing would be less than significant.

As discussed above, the Project would have no impact on mineral resources. Because of the large number and broad extent of oil drilling districts and state-designated oil fields in the greater area, some of the related projects may be located within these designated areas. However, with implementation of new methodologies, such as slant drilling, related projects would not substantially reduce extraction capabilities, impede exploratory operations, or would cumulatively result in the significant loss of availability of oil resources. Regardless, because the Project would have no incremental increase in contribution to a potential cumulative impact on mineral resources, the Project would have no cumulatively considerable impact on such resources. Thus, cumulative impacts would be less than significant.

With regard to impacts regarding hazards due to design features and emergency access, the Project would result in less than significant impacts. Each related project would be reviewed by the City during the development review process to ensure compliance with the City's requirements relative to the provision of ingress and egress design, emergency access and safe streets. Thus, with compliance to applicable regulatory requirements and site-specific mitigation, as necessary, the Project's contribution to impacts regarding hazardous design features or emergency access would not be cumulatively considerable. Thus, cumulative impacts would be less than significant.

Due to their site-specific nature, impacts related to wildfire are typically assessed on a project-by-project basis for a particular localized area. As with the Project, related projects would address site-specific wildfire hazards through implementation of site-specific recommendations and/or mitigation measures. Related projects would also be subject to local and state regulations and standards for fire safety. Regardless, because the Project is not subject to wildland fire hazards, the Project's contribution to wildfire impacts would not be cumulatively considerable. Thus, cumulative impacts would be less than significant.

Based on the above, Project implementation would not be expected to result in a considerable contribution to cumulatively significant impacts for the environmental topics discussed above. No further discussion of potential cumulative effects for these topics in the EIR is required.

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

Potentially Significant Impact. As discussed in this Initial Study, the Project could result in potentially significant environmental impacts associated with Air Quality, Cultural Resources, Energy, Paleontological Resources, Greenhouse Gas Emissions, Land Use and Planning, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, and Utilities and Service Systems. These impacts could have potentially adverse effects on human beings, and the EIR will provide further analysis of these potential impacts.