Appendices

Appendix A

Initial Study, Notice of Preparation (NOP), and NOP Comment Letters

Appendix A.1

Initial Study

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

INITIAL STUDY

2159 Bay Street Project

Case Number: ENV-2017-625-EIR

Project Addresses: 2136–2148 and 2159 E. Bay Street, and 2145–2161 E. Sacramento Street, Los Angeles, CA 90021

Community Plan Area: Central City North

Council District: 14—Jose Huizar

Project Description: The Project includes the development of a three-building creative office campus that would be comprised of an eight-story commercial high-rise building with up to two levels of subterranean parking, and two two-story commercial buildings. The Project would specifically include approximately 202,954 square feet of creative office space, 16,000 square feet of retail and restaurant space, and 3,235 square feet of event and meeting space. The Project would provide a total of 711 vehicle parking spaces within up to two levels of subterranean parking levels and one ground floor parking level. To provide for the Project, all existing buildings and uses on-site would be removed, including the three existing buildings which include 39,328 square feet of office and industrial uses.

The Project would create a pedestrian environment along Bay Street and Sacramento Street, an area that currently lacks pedestrian infrastructure, by constructing new sidewalks, street trees, ground floor commercial space with storefront glazing, and a lobby entrance for the office/creative office tenants along a pedestrian paseo. Vehicular access to the Project would be provided from driveways located on Bay Street and Sacramento Street, and a lay-by for passenger drop-off and pick-up on Bay Street. Levels 2 through 8 of the high-rise building would include outdoor terraces for the building's office tenants, and a pedestrian paseo would be provided on the eastern portion of the Site.

PREPARED FOR:
City of Los Angeles
Department of City Planning

PREPARED BY:
Eyestone Environmental

APPLICANT:
Sacramento Street Property LP

August 2018

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INITIAL STUDY

Executive Summary

Date: August 24, 2018

Project Title: 2159 Bay Street Project

Environmental Case Number: ENV-2017-625-EIR

Related Cases: N/A

Project Location: The Project Site consists of five parcels (APNs 5166-005-010, -013, -009, -008 and 5166-001-002) comprising 1.7 acres at the eastern termini of E. Bay Street and E. Sacramento Street (east of S. Santa Fe Avenue) in the Arts District area of the City of Los Angeles. The following addresses are associated with the Project Site: 2136–2148 and 2159 E. Bay Street, and 2145–2161 E. Sacramento Street, Los Angeles, CA 90021.

Community Plan Area: Central City North

Council District: 14—Jose Huizar

Lead City Agency: City of Los Angeles Department of City Planning

Staff Contact Name and Address: Kathleen King

Email: kathleen.king@lacity.org

Phone Number: (213) 847-3746

Applicant Name and Address: Sacramento Street Property LP, 400 S. Hope Street, Ste. 200, Los Angeles, CA 90017

Phone Number: (213) 443-5048

General Plan Designation: Heavy Industrial

Zoning: M3-1-RIO

PROJECT DESCRIPTION: The Project includes the development of a three-building creative office campus that would be comprised of an eight-story commercial high-rise building with up to two levels of subterranean parking, and two two-story commercial buildings. The Project would specifically include approximately 202,954 square feet of creative office space, 16,000 square feet of retail and restaurant space, and 3,235 square feet of event and meeting space. The Project would provide a total of 711 vehicle parking spaces within up to two levels of subterranean parking levels and one ground floor parking level. To provide for the Project, all existing buildings and uses on-site would be removed, including the three existing buildings which include 39,328 square feet of office and industrial uses.

The Project would create a pedestrian environment along Bay Street and Sacramento Street, an area that currently lacks pedestrian infrastructure, by constructing new sidewalks, street trees, ground floor

commercial space with storefront glazing, and a lobby entrance for the office/creative office tenants along a pedestrian paseo. Vehicular access to the Project would be provided from driveways located on Bay Street and Sacramento Street, and a lay-by for passenger drop-off and pick-up on Bay Street. Levels 2 through 8 of the high-rise building would include outdoor terraces for the building's office tenants, and a pedestrian paseo would be provided on the eastern portion of the Site.

(For additional detail, see "Part A—Project Description.")

ENVIRONMENTAL SETTING:

The Project Site is currently developed with three buildings that comprise 39,328 square feet of floor area and are utilized by Hyperloop One for office and light industrial purposes, including engineering and test development operations, office operations, and fabrication and machining operations. The Project Site is located at 2136–2148 and 2159 E. Bay Street, and 2145–2161 E. Sacramento Street, and is generally bounded by Bay Street to the north with textile and import businesses to the north of Bay Street, industrial-zoned (M3-1-RIO) property to the west developed with a surface parking lot and one-story commercial/industrial buildings, Sacramento Street to the south with warehouse uses to the south of Sacramento Street, and industrial-zoned (M3-1-RIO) properties to the east used for surface parking and the BNSF railroad. Primary regional access to the Project Site is provided by the Hollywood Freeway (US-101) to the east and north, the Santa Monica Freeway (I-10) to the south and east, and the Golden State Freeway (I-5) to the east, which are all accessible within less than 1 mile of the Project Site. Major arterials providing regional access to the Project Site include South Santa Fe Avenue, East 7th Street, East Olympic Boulevard, and South Alameda Street.

(For additional detail, see "Part A—Project Description.")

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

No.

Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement.):

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION (to be completed by Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

Kathleen King	Planning Associate
PRINTED NAME	**TITLE**
SIGNATURE	(213) 847-3746
	TELEPHONE NUMBER

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated

7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

    a) The significance criteria or threshold, if any, used to evaluate each question; and

    b) The mitigation measure identified, if any, to reduce the impact to less than significance.

A. Project Description

ATTACHMENT A

Project Description

A. Project Summary

The Project includes the development of a three-building creative office campus that would be comprised of an eight-story commercial high-rise building with up to two levels of subterranean parking, and two two-story commercial buildings. The Project would specifically include approximately 202,954 square feet of creative office space, 16,000 square feet of retail and restaurant space, and 3,235 square feet of event and meeting space. The Project would provide a total of 711 vehicle parking spaces within up to two levels of subterranean parking levels and one ground floor parking level. To provide for the Project, all existing buildings and uses on-site would be removed, including the three existing buildings which include 39,328 square feet of office and industrial uses.

The Project would create a pedestrian environment along Bay Street and Sacramento Street, an area that currently lacks pedestrian infrastructure, by constructing new sidewalks, street trees, ground floor commercial space with storefront glazing, and a lobby entrance for the office/creative office tenants along a pedestrian paseo. Vehicular access to the Project would be provided from driveways located on Bay Street and Sacramento Street, and a lay-by for passenger drop-off and pick-up on Bay Street. Levels 2 through 8 of the high-rise building would include outdoor terraces for the building's office tenants, and a pedestrian paseo would be provided on the eastern portion of the Site.

B. Environmental Setting

1. Project Location

As shown in Figure A-1 on page A-2, the Project Site is located in the Arts District area of the City of Los Angeles (City), approximately 14 miles east of the Pacific Ocean. The Project Site is also located within the boundaries of the Central City North Community Plan Area within the City of Los Angeles. Primary regional access to the Project Site is provided by the Santa Ana Freeway (US-101) to the east and north, the Santa Monica Freeway (I-10) to the south and east, and the Golden State Freeway (I-5) to the east, which are all accessible within less than 1 mile of the Project Site. Major arterials providing regional access to the Project Site include South Santa Fe Avenue, East 7th Street, East Olympic Boulevard, and South Alameda Street.

The Project Site's property addresses are 2136–2148 and 2159 E. Bay Street, and 2145–2161 E. Sacramento Street. The Project Site encompasses five parcels totaling approximately

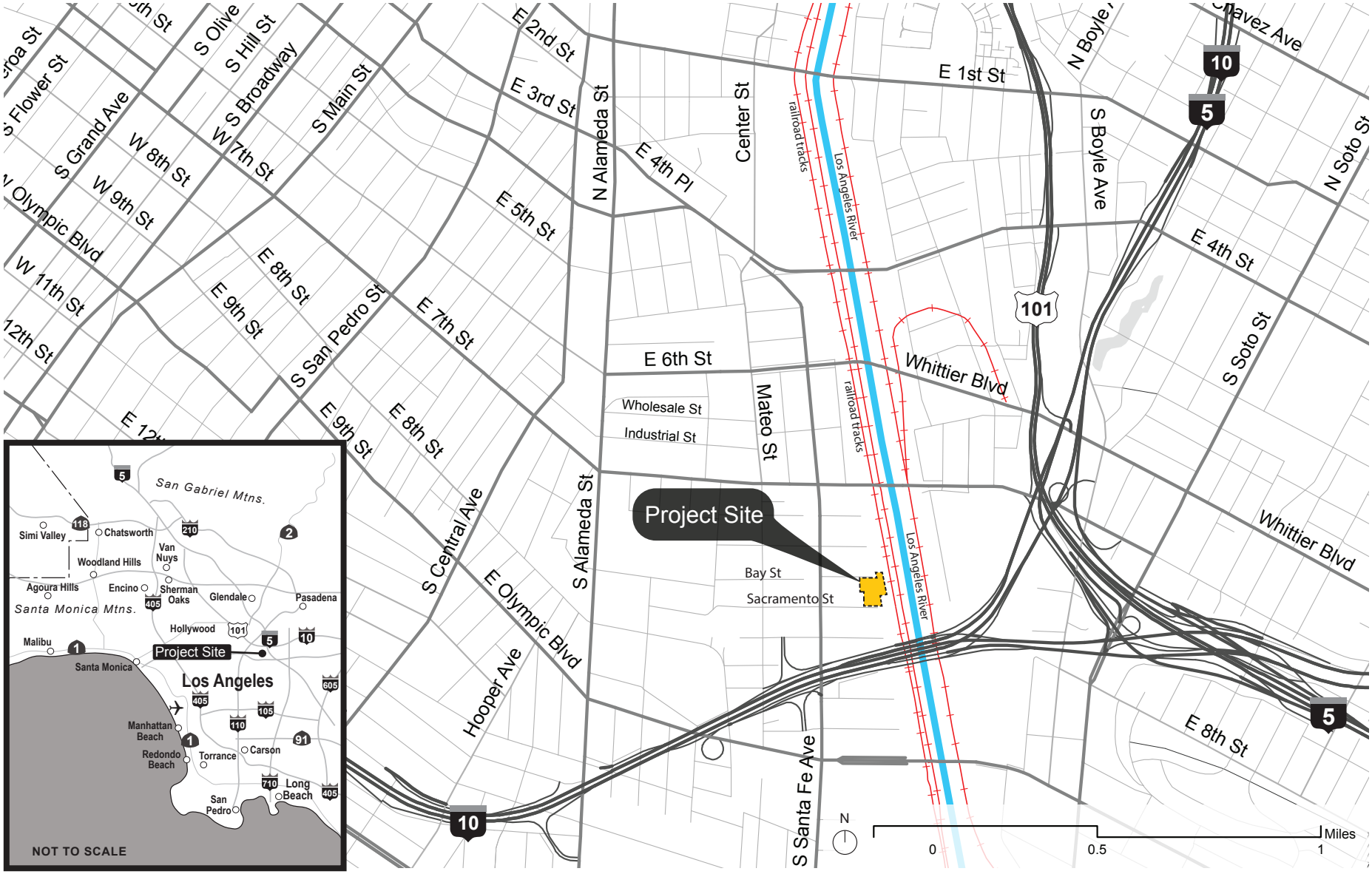

Figure A-1
Project Site Map

Source: Los Angeles County GIS, 2015; Eyestone Environmental, 2018.

74,063 square feet of lot area (1.70 acres), and includes Assessor's Parcel Numbers 5166-001-002 and 5166-005-008, -009, -010, and 013.

2. Existing Uses

a. Existing Project Site Conditions

As shown in Table A-1 on page A-4, the Project Site is currently developed with three buildings that are comprised of the following: 7,106 square feet of office uses in Building A; 6,584 square feet of light industrial uses in Building B; and 25,638 square feet of light industrial and creative office uses in Building C. In total, the three buildings comprise 39,328 square feet of floor area. Hyperloop One currently occupies all tenant spaces at the site. Existing uses include engineering and test development operations, office operations, and fabrication and machining operations. Exterior areas in the central and eastern portions of the Project Site are used for storage, equipment staging, and exterior operations. Other smaller structures at the Project Site include shipping containers that have been converted into offices and conference rooms, tents used for welding operations and meetings, and stacked parking systems. In addition, designated areas for storage of industrial byproducts and materials associated with on-site uses are located on the south side of Building C. The Project Site is relatively flat with limited ornamental landscaping.

b. Land Use and Zoning

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

The Project Site is also located within the Central Industrial Redevelopment Project area and a Transit Priority Area (TPA) pursuant to Senate Bill (SB) 743. The Central Industrial Redevelopment Project (Central Industrial Plan) was adopted by the City Council on November 15, 2002 pursuant to Ordinance No. 174978. The project adopted under the Central Industrial Plan includes a number of properties (CBD Parcels) which were previously part of the Central Business District Redevelopment Project (CBD Project). The CBD Project is generally bounded by 4th Street on the north, Washington Boulevard and the I-10 Freeway on the south, the Los Angeles River on the east, and Stanford Avenue and San Pedro Street on the west. The purpose of the CBD Project is to eliminate various conditions of blight that have been identified within the proposed project area and to redevelop the area through new industrial, commercial, and residential development and rehabilitation/reuse of existing development, to maintain and expand industrial, manufacturing uses, commercial business and residential neighborhoods, and to preserve /reuse cultural resources. As part of the building permit process, the CRA successor agency will review the Project for consistency with the Central Industrial Plan.

Table A-1
Summary of Existing Uses

Land Use	Floor Area (sf)
Office (Bldg. A)	7,106 sf
Light Industrial (Bldg. B)	6,584 sf
Creative Office (Bldg. C)	16,000 sf
Light Industrial (Bldg. C)	9,638 sf
Total	**39,328 sf**

sf = square feet
Source: Eyestone Environmental, 2018.

3. Surrounding Land Uses

The Project Site is generally bounded by Bay Street to the north with textile and import businesses to the north of Bay Street, industrial-zoned (M3-1-RIO) property to the west developed with a surface parking lot and one-story commercial/industrial buildings, Sacramento Street to the south with warehouse uses to the south of Sacramento Street, and industrial-zoned (M3-1-RIO) properties to the east used for surface parking and the BNSF railroad. Beyond the BNSF railroad to the east is the Los Angeles River. Similar to the Project Site, the surrounding properties are zoned M3-1-RIO and designated for Heavy Manufacturing land uses by the Central City North Community Plan.

The Project Site is located at the southern edge of the Arts District area, which has experienced residential and commercial growth over the past decade. Former industrial and warehouse buildings continue to be converted for commercial uses and live/work spaces. As shown in Figure A-2 on page A-5, the Project vicinity is developed with a mix of light industrial, heavy industrial, warehouse, and commercial uses. Adjacent uses include textile and import businesses to the north, including a motorcycle dealership (Falcon Motorcycles) directly north of the Project Site across Bay Street, a surface parking lot and railroad yard to the east, knitting mills and fabric warehouses to the south, and a surface parking lot and one-story commercial/industrial building to the west.

The Project Site is also located approximately 0.5 mile south of the 6th Street Viaduct project that is currently under construction and will provide a two-way multi-modal bridge with dedicated bicycle lanes that will span the Los Angeles River and connect to the Boyle Heights neighborhood to

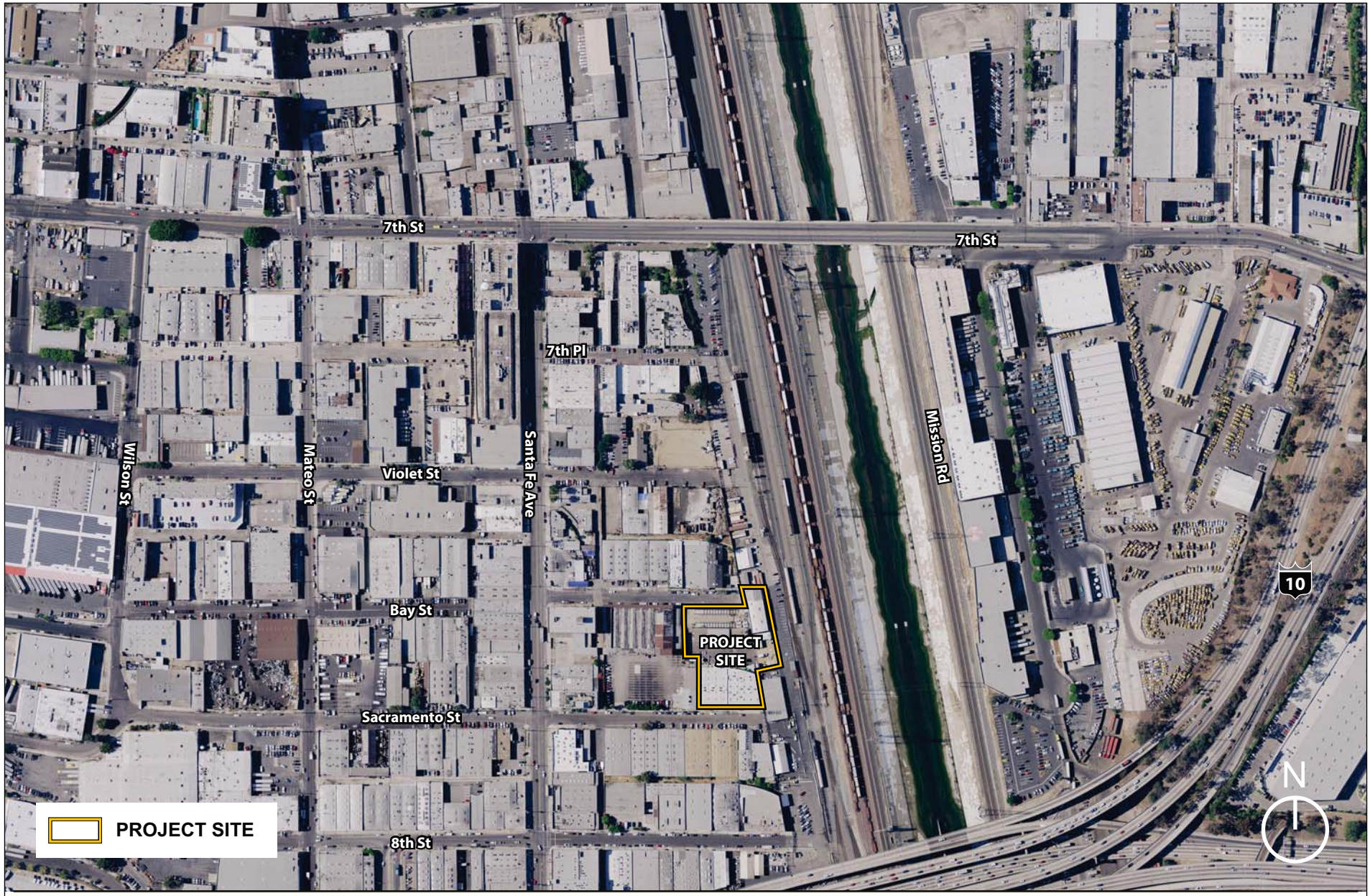

Figure A-2
Aerial Photograph of Project Vicinity

Source: Apple Maps, 2017; Eyestone Environmental, 2018.

the east.[1] Plans also call for new recreational green spaces on former industrial sites underneath the new bridge.[2]

C. Description of the Project

1. Project Overview

The Project includes the development of a three-building creative office campus on a 74,063-square-foot (1.7-acre) site located in the Arts District area of the City. As shown in Table A-2 on page A-7, proposed new uses would specifically include 202,954 square feet of creative office space, 16,000 square feet of retail and restaurant space, and 3,235 square feet of event and meeting space. The new uses would be located in an eight-story commercial high-rise building with a maximum height of 140.5 feet and two two-story commercial buildings. The Project would also provide a total of 711 vehicle parking spaces within up to two levels of subterranean parking levels and one ground floor parking level. To provide for the Project, all existing on-site structures would be removed.

Overall, as shown in Table A-2, the Project would remove approximately 39,328 square feet of existing floor area and develop approximately 222,189 square feet of floor area, resulting in a net increase of approximately 182,861 square feet of floor area. The Project would have a FAR of 3:1.

The proposed buildings would be connected via a north-south pedestrian paseo to link the Project's retail components from Bay Street to Sacramento Street. The pedestrian paseo would be anchored by common open space, street trees, seating areas, and low scale structures to promote an active pedestrian experience on the ground floor. As shown in Figure A-3 on page A-8, the ground level of the campus would include bicycle parking, office lobbies, and various amenities. Office space would be provided on levels 2 through 8 of the high-rise building and would feature outdoor terraces for tenants, as further illustrated in Figure A-4 through Figure A-7 on pages A-9 through A-12.

2. Design and Architecture

As discussed above, the proposed uses would be located in an eight-story commercial high-rise building with a maximum height of 140.5 feet and two two-story commercial buildings with a total FAR of 3:1. The design of the Project is intended to convey a classic industrial architecture that draws from elements of the surrounding neighborhood. The proposed internal pedestrian paseo would create a pedestrian linkage between Bay Street and Sacramento Street. The Project would

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1 City of Los Angeles, Bureau of Engineering, Sixth Street Viaduct Replacement Project, Frequently Asked Questions, www.sixthstreetviaduct.org/faq, accessed January 25, 2018.

2 City of Los Angeles, Bureau of Engineering, Sixth Street Viaduct Replacement Project, Parc: About the Project, www.sixthstreetviaduct.org/parcproject, accessed January 25, 2018.

Table A-2
Summary of Existing, Proposed Demolition, and Proposed New Floor Areas

Land Use	Existing	Proposed Demolition	Proposed Construction	Net New
Creative Office	16,000 sf	(16,000 sf)	202,954 sf	186,954 sf
Office	7,106 sf	(7,106 sf)	—	(7,106 sf)
Light Industrial	16,222 sf	(16,222 sf)	—	(16,222 sf)
Retail/Restaurant	—	—	16,000 sf	16,000 sf
Event/Meeting Space	—	—	3,235 sf	3,235 sf
Total	**39,328 sf**	**(39,328 sf)**	**222,189 sf**	**182,861 sf**

sf = square feet
Source: Eyestone Environmental, 2018.

incorporate glass, masonry, and concrete to blend with the Arts District's industrial context while also allowing for a possible future connection to the Los Angeles River.

The proposed building is characterized by staggered terraces that distinguish each of the eight levels of the high-rise building and break up the façade by providing setbacks from both Bay Street and Sacramento Street. Common spaces such as the pedestrian paseo and the terraces combine social and professional environments that reflect the mixed-use nature of the Project.

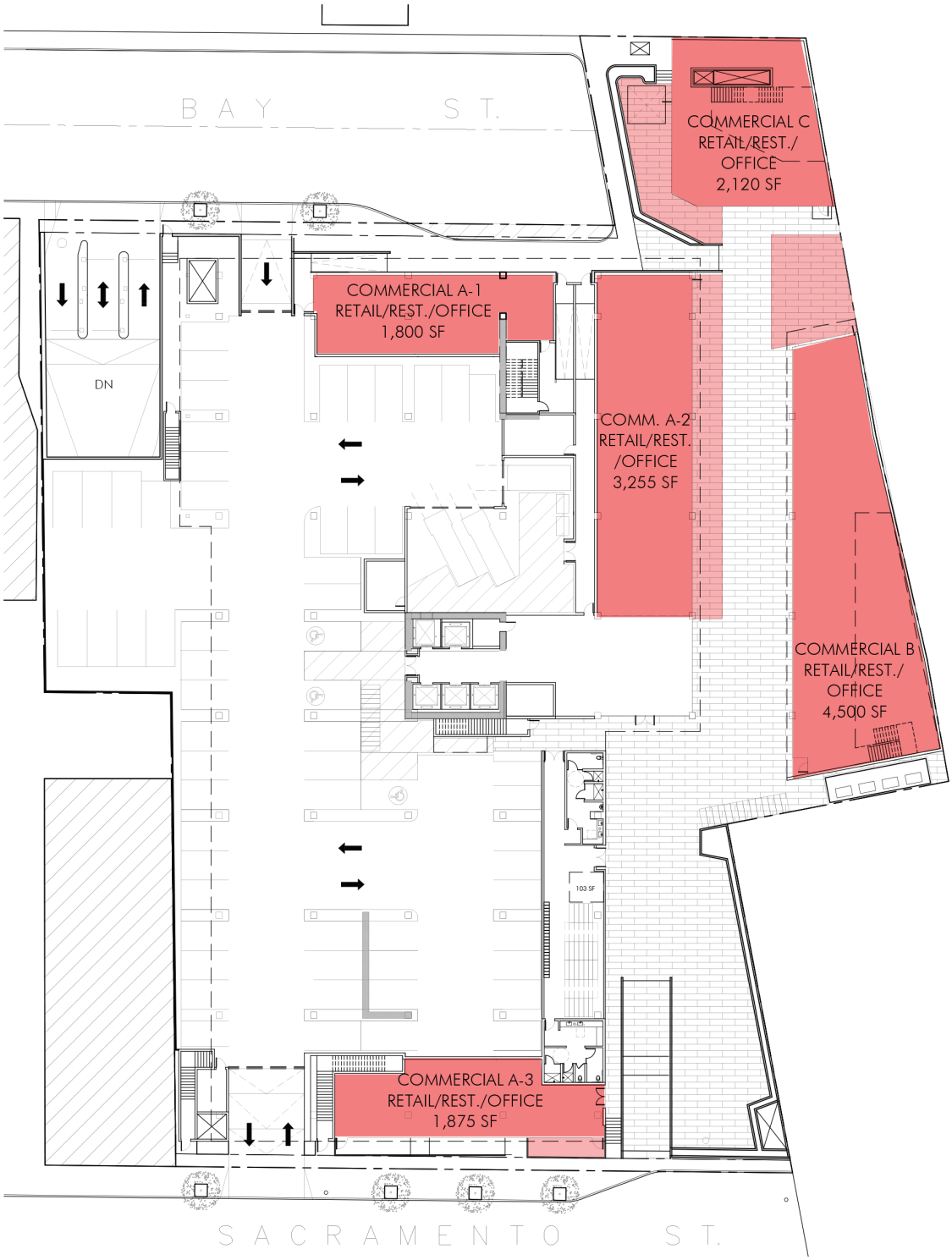
3. Open Space and Landscaping

Open space and landscaping within the Project Site would include a pedestrian paseo connecting Bay and Sacramento Streets through the Project Site, as well as a series of terraces at different levels throughout the proposed buildings. On both ends of the pedestrian paseo, the Project would include landscaped planters. The pedestrian paseo would also incorporate various gathering zones that would be dotted with potted plants.

The streets along the Project Site would be planted with street trees along the Project frontage. In addition, upper terraces would provide views to the nearby downtown skyscape and would be landscaped with potted plants. Tree species selected for the street trees and potted plants would be drought-tolerant and/or of a native tree species and would primarily require moist to dry soil conditions. Smart irrigation systems with flow sensors and drip tubing delivery systems would be used.

4. Access, Circulation, and Parking

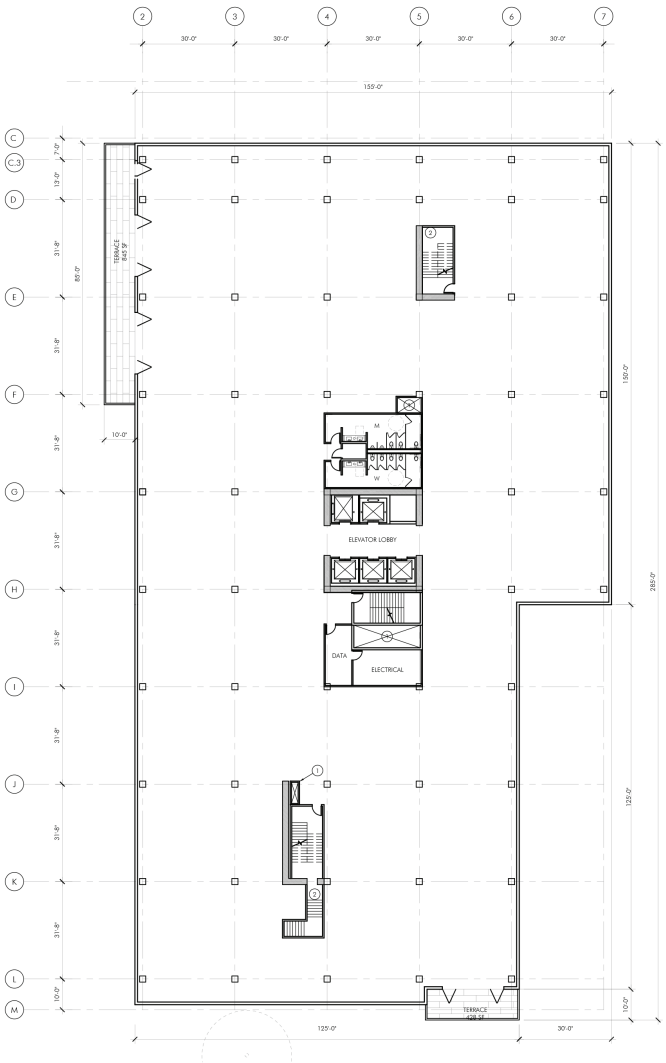
Vehicular access to the ground level parking areas would be provided via an ingress driveway on Bay Street and an ingress/egress driveway on Sacramento Street. Access to the subterranean



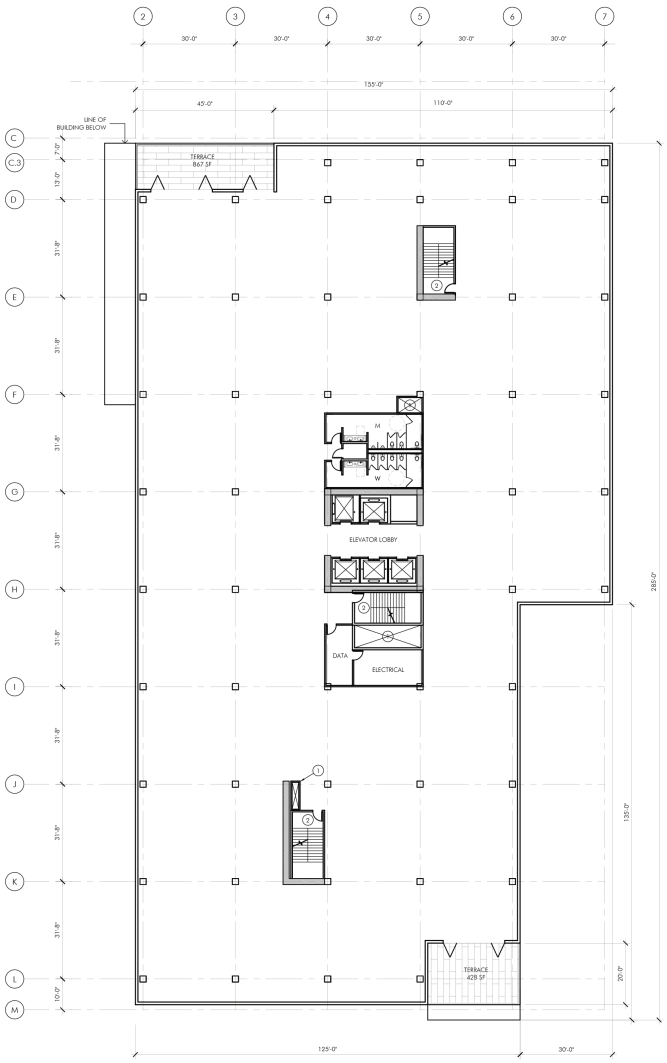
GROUND FLOOR PLAN

Figure A-3
Conceptual Site Plan—Ground Level

Source: Shimoda Design Group, 2018.



2ND FLOOR PLAN



3RD FLOOR PLAN

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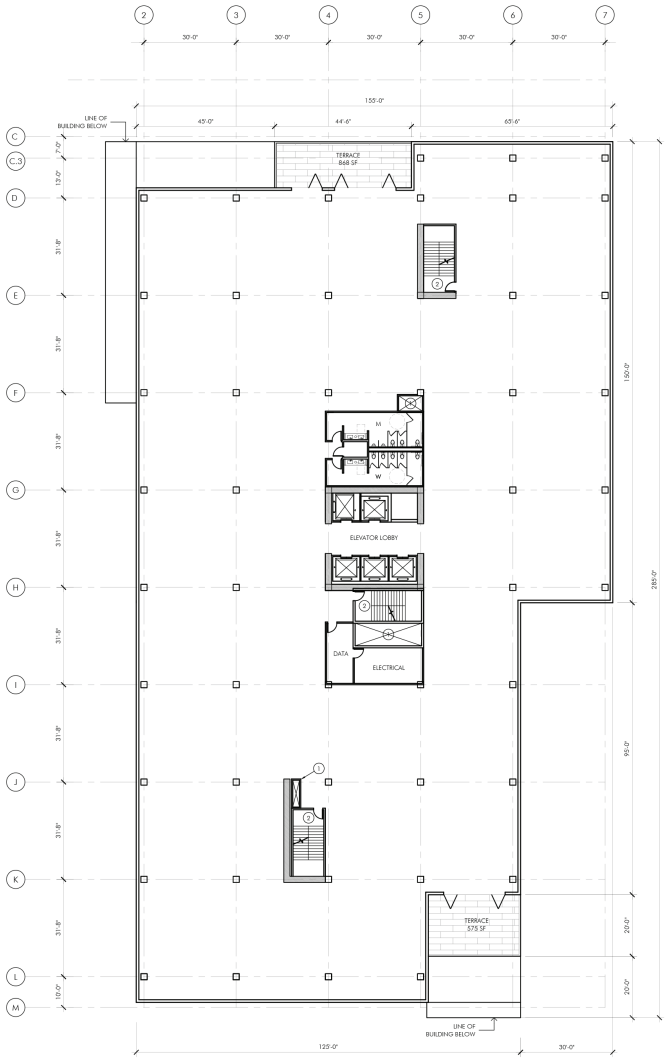
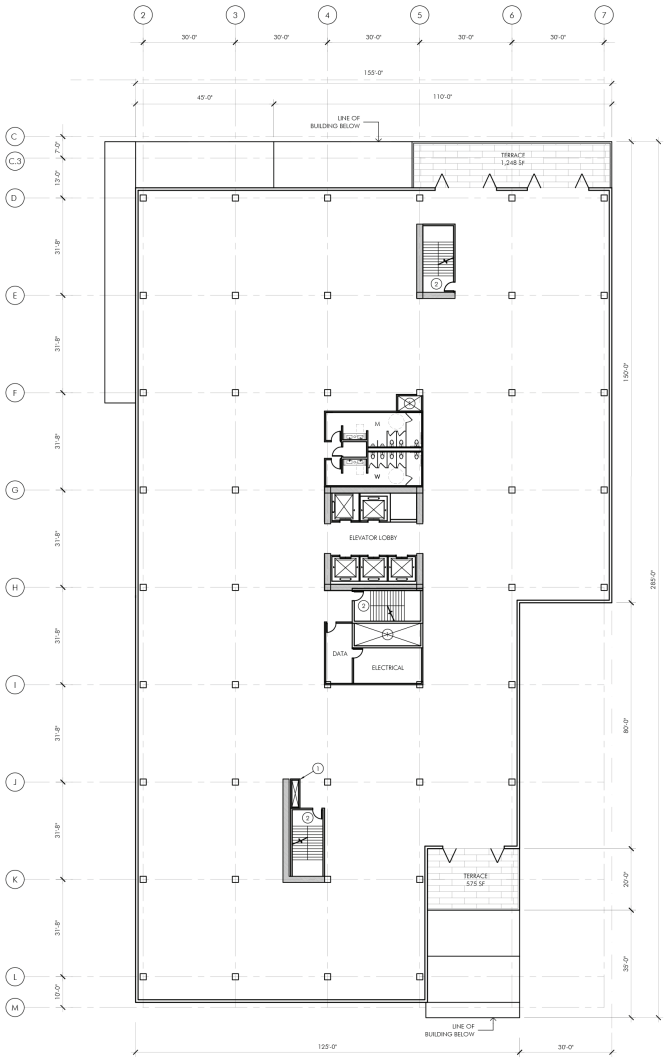
Figure A-4

Conceptual Site Plan—Levels 2–3

Source: Shimoda Design Group, 2018.



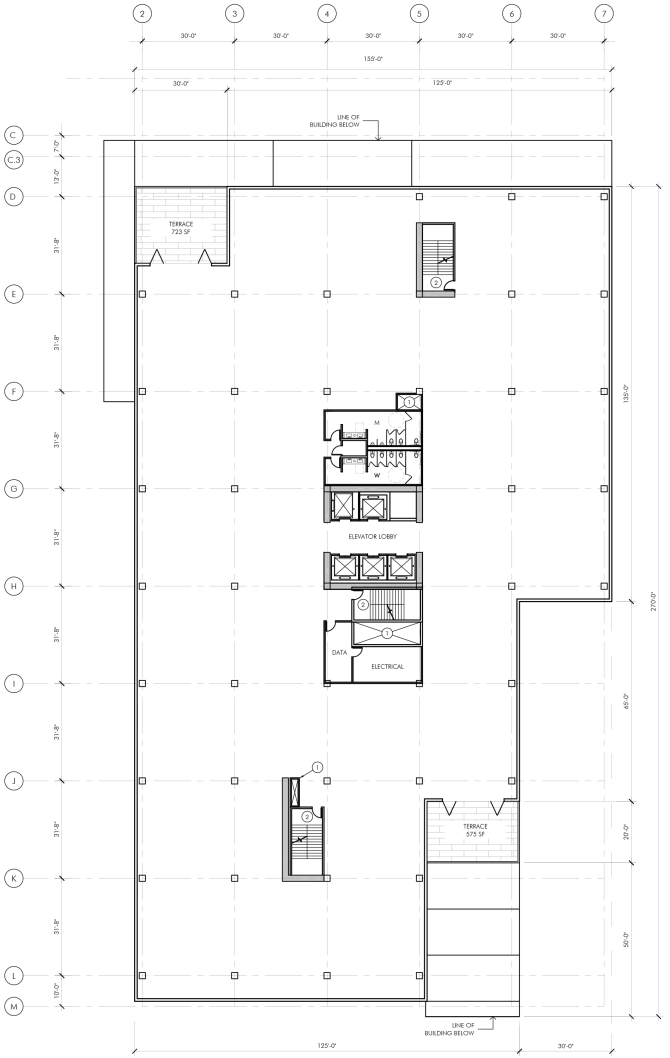
4TH FLOOR PLAN



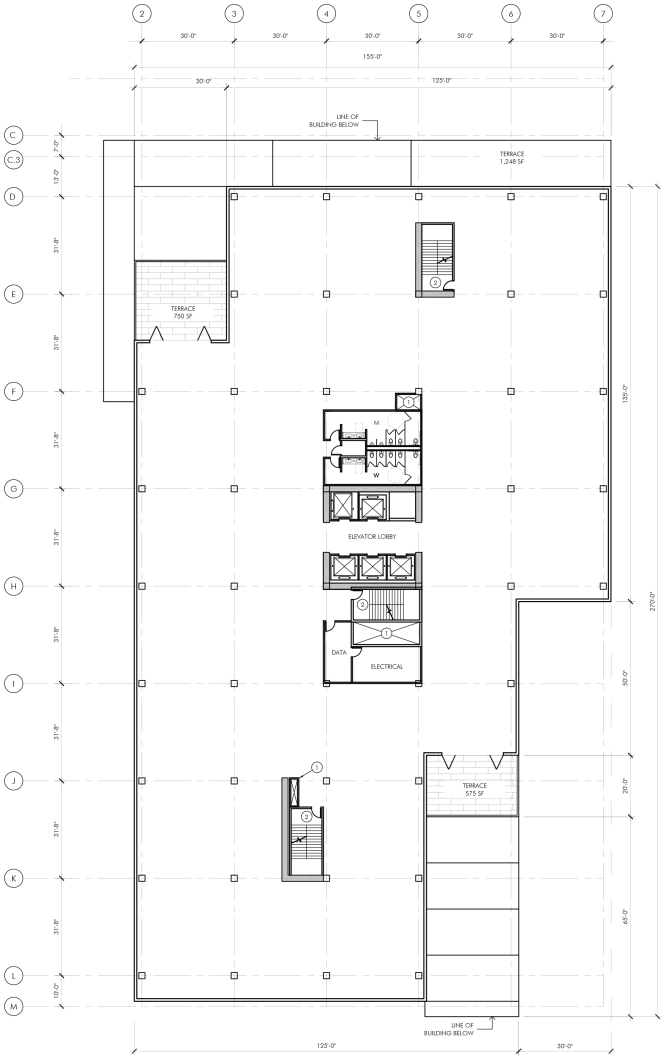
5TH FLOOR PLAN

Figure A-5
Conceptual Site Plan—Levels 4–5

Source: Shimoda Design Group, 2018.



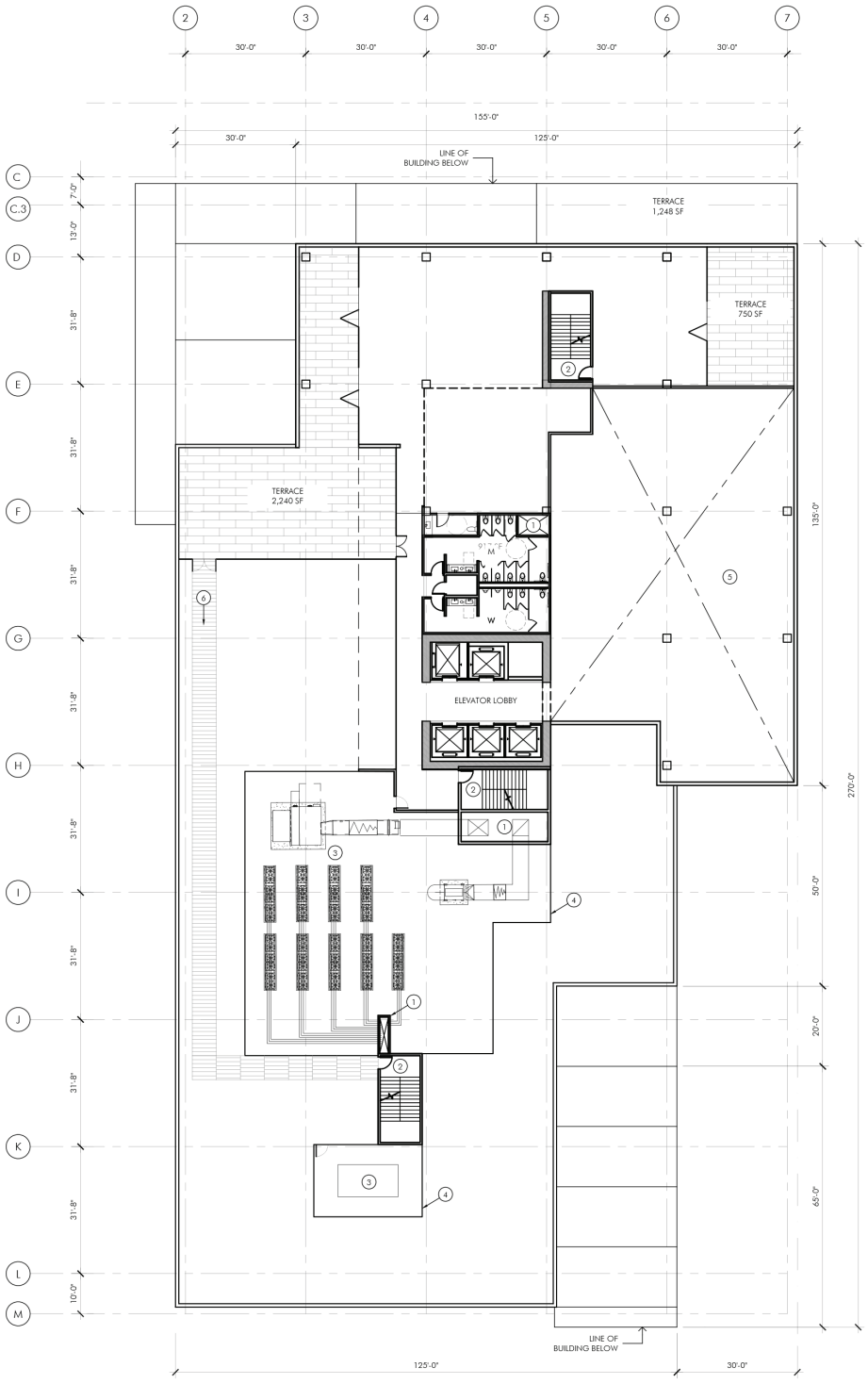
6TH FLOOR PLAN



7TH FLOOR PLAN

Figure A-6
Conceptual Site Plan—Levels 6–7

Source: Shimoda Design Group, 2018.



PENTHOUSE FLOOR PLAN

N

Figure A-7

Conceptual Site Plan—Level 8 (Penthouse)

Source: Shimoda Design Group, 2018.

parking levels would be provided via an ingress/egress driveway on Bay Street. Access for trash pickup and other freight vehicles would be provided via a loading dock within the ground level parking area. A proposed drop-off zone on Bay Street would provide a dedicated space for Project employees and patrons arriving via taxi or rideshare services.

Pedestrian access would be provided primarily via newly constructed sidewalks on Bay Street and Sacramento Street. Access to the ground floor retail and restaurant spaces would be provided via the sidewalks and the proposed pedestrian paseo along the east side of the Project Site. Access to the eight-story creative office component would be provided via a lobby accessible from Bay Street to the north, Sacramento Street to the south, and the proposed pedestrian paseo to the east. The Project Site is also situated within walking distance to other commercial businesses located in the Arts District area along the 7th Street, Olympic Boulevard, and Alameda Street corridors, to the north, south, and west of the Project Site.

Public transit service in the vicinity of the Project Site is currently provided by multiple local and regional bus lines, several of which provide connections to Downtown subway stations including Pershing Square and 7th Street/Metro Center. In particular, the Los Angeles County Metropolitan Transit Authority (Metro) provides a bus stop for Metro Local Line 60 located at the corner of South Santa Fe Avenue and Violet Street, approximately 580 feet northwest of the project site.[3] A total of five other bus lines, including both local-stop (Metro 18, Metro 62, and Metro 66), and rapid lines (Metro 720 and Metro 760) currently serve the Project Site via stops located within a half mile along 7th Street, Santa Fe Avenue, Olympic Boulevard, and other nearby streets. Additionally, the Greyhound Bus Terminal is located northwest of the Project Site on 7th Street, which provides inter-city bus service to various locations outside of the Los Angeles.

Based on Los Angeles Municipal Code (LAMC) requirements for the proposed land uses, the Project would be required to provide 530 parking spaces. The Project proposes 711 parking spaces that would be located within up to two subterranean levels and the ground level. The Project would comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking area.

In accordance with LAMC requirements, the Project would require and would provide 91 bicycle parking spaces, including 37 short-term spaces and 54 long-term spaces.

5. Lighting and Signage

Exterior lighting along the public areas would include pedestrian-scale (i.e., lower to the ground, spaced closer together) fixtures. Exterior lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the site. Project lighting would be designed to minimize light trespass from the Project Site

[3] Metro, Nextrip Service (Route 60 Downtown LA–Artesia Station via Long Beach, Stop: Santa Fe/Violet), www.metro.net/riding/nextrip/.

and would comply with all LAMC requirements. All new street and pedestrian lighting within the public right-of-way along Bay Street and Sacramento Street would comply with applicable City regulations and would require approval from the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties.

Proposed signage would include mounted project identity signage, building and commercial tenant signage, and general ground-level and wayfinding pedestrian signage. Wayfinding signs would be located at parking garage entrances, elevator lobbies, vestibules, and corridors. All signage would meet the requirements of the LAMC.

6. Site Security

During construction of the Project, temporary security measures including security fencing, lighting, and locked entry would be implemented to ensure security of the Project Site. The Applicant would also implement the following features to enhance on-site safety:

- Lobby areas are designed to be visible from the public streets or entry ways.
- Building entrances and exits, spaces around buildings, and pedestrian walkways are designed to be open and in view of surrounding sites.
- Public spaces are designed to be easily patrolled and accessed by safety personnel.
- Public restrooms and other common facilities would be located in convenient and accessible areas in order to increase use and the perception of safety.
- Sufficient lighting of building entries and walkways would be provided to facilitate pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings.
- Sufficient lighting of parking areas, elevators, and lobbies would be provided to maximize visibility and reduce areas of concealment.
- Access controls in the forms of private on-site security, alarm systems, a closed circuit security camera system, and keycard entry would be included for the creative office building and the parking areas.

7. Sustainability Features

The Project would utilize state of the art green building technology initiatives and eco-friendly sustainability practices. The Project would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. As a basis of submission, the Project would follow City of Los Angeles Standards and California Building Code 2016. These standards are intended to reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on

natural resources and infrastructure. The Project would be designed to achieve U.S. Green Building Council's (USGBC) Leadership in Energy Efficiency and Design (LEED) Silver equivalence..

Specific sustainable elements integrated within the Project would include:

- Use of daylighting where feasible in the Project to reduce the electrical consumption load and maximize natural light for occupants.
- Use of recycled and locally sourced materials where feasible.
- Use of drought resistant landscaping to reduce irrigation water use.
- Implementation of feasible methods to delay or reduce storm water discharge, and improve the quality of storm run-off (e.g., infiltration systems, stormwater capture and use, etc.).
- Use of fixtures, irrigation systems and integrated building monitoring systems that can reduce water use.
- Implementation of a TDM program, as necessary.
- Re-use of existing commercial land.
- Implementation of a bike parking system in accordance with City requirements.
- Implementation of energy-efficient site lighting and design to meet Title-24 lighting density control standards.
- Placement of more than 50 percent of parking under the building and use of landscaping and reflective materials to address heat island effect as feasible.
- Implementation of building systems designed to avoid the use of heating, refrigeration, and fire suppression systems that include chlorofluorocarbons or halon compounds.
- Use of building energy modeling to improve energy performance.
- Implementation of energy efficient building envelope design, including high performance glazing, cool roof, and optimized insulation levels.
- Use of energy efficient lighting and HVAC equipment.
- Implementation of building commissioning practices to fine-tune energy using system performance.
- Implementation of building energy management controls system to optimize energy performance on an ongoing basis.
- Provision for electric vehicle charging (10% of Code-required parking prewired with 5% of Code-required parking further improved with charging stations).
- Implementation of a construction waste management plan.

- Implementation of indoor environmental quality measures.
- Accommodation of future photovoltaic array on the roof.

Additionally, in accordance with CEQA Guidelines Appendix F, the EIR will provide further information as to energy conservation, energy implications, and the energy-consuming equipment and processes that would be used during Project construction and operation. Design features of the Project, energy supplies that would serve the Project, and total estimated daily vehicle trips that would be generated by the Project will also be analyzed. In addition, while development of the Project would not be anticipated to cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the CEQA Guidelines, further analysis of the Project's consistency with Appendix F will also be provided in the EIR.

8. Anticipated Construction Schedule

Construction of the Project would commence with demolition of the existing building, followed by grading and excavation. Building foundations would then be laid, followed by building construction, and landscape installation. Project construction is anticipated to be completed by 2025. The construction haul route from the Project Site is anticipated to be via Bay Street or Sacramento Street, then to Santa Fe Avenue, and then to the I-10 Freeway. The Project may require excavation up to 42 feet below ground surface. In addition, it is estimated that approximately 140,000 cubic yards would be exported from the Project Site.

D. Requested Permits and Approvals

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

- Pursuant to LAMC Section 12.32.Q, a Vesting Zone and Height District Change from M3-1-RIO to M3-2D-RIO.
- Pursuant to LAMC Section 16.50, Site Plan Review for the construction of a mixed-use commercial building with 222,189 square feet of floor area.
- Pursuant to LAMC Section 12.28, a Zoning Administrator's Adjustment to allow use of pre-dedication lot area to calculate FAR.
- Pursuant to LAMC Section 12.24 W.1, a Master Conditional Use Permit to allow the sale and/or dispensing of a full line of alcoholic beverages for on- and off-site consumption for up to six establishments.
- Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map with one ground lot and four commercial condominium units.
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, haul route approval, foundation permits, building permits, and sign permits.

B. Environmental Checklist

ATTACHMENT B—ENVIRONMENTAL CHECKLIST

Explanation of Checklist Determinations

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Would the project:

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

Less Than Significant Impact. A scenic vista is a view of a valued visual resource. Scenic vistas generally include public views that provide visual access to large panoramic views of natural features, unusual terrain, or unique urban or historic features. A scenic vista field of view can be wide, extend into the distance, and include focal views that focus on a particular object, scene, or feature of interest for the benefit of the general public.

As described in Part A, Project Description, of this Initial Study, the Project Site is currently developed with three buildings that comprise the following: 7,106 square feet of office uses in Building A; 16,222 square feet of light industrial uses in Building B and C; and 16,000 square feet of creative office uses in Building C. Existing uses include engineering and test development operations, office operations, and fabrication and machining operations. Exterior areas in the central and eastern portions of the Project Site are used for storage, equipment staging, and exterior operations. Other smaller structures at the Project Site include shipping containers that have been converted into offices and conference rooms, tents used for welding operations and meetings, and stacked parking systems. In addition, designated areas for storage of industrial byproducts and

materials associated with on-site uses are located on the south side of Building C. The Project Site is relatively flat with limited ornamental landscaping.

The Project Site is located within a highly urbanized area of the City of Los Angeles. The Project vicinity currently lacks a thematic aesthetic character largely due to the transitional nature of the neighborhood. The area surrounding the Project Site contains an eclectic mix of buildings that vary in age, architecture, heights, massing, and materials. Additionally, buildings in the Project vicinity vary in age and physical condition, with some of the buildings in varying stages of disrepair and others that have been redeveloped as residential, office, and restaurant spaces. The visual character of the Project area continues to transform and improve with new and on-going developments that incorporate both the historic and contemporary nature of the area.

Visual resources in the general vicinity of the Project Site include the Los Angeles River, the downtown Los Angeles skyline, and structures that are considered historic resources. Views of these resources from public rights-of-way are limited due to the predominantly flat terrain of the vicinity and the dense, intervening development that blocks long-range, expansive views. Visual resources that can be seen in combination with the Project Site are primarily limited to those located adjacent to the Project Site due to the densely developed nature of the Project Site area.

As discussed in Part A, Project Description, of this Initial Study, the Project would replace existing buildings with approximately 202,954 square feet of creative office space, 16,000 square feet of retail and restaurant space, and 3,235 square feet of event and meeting space. The new uses would be located in an eight-story commercial high-rise building with a maximum height of 140.5 feet and two two-story commercial buildings. The Project would also provide a total of 711 vehicle parking spaces in up to two levels of subterranean parking levels and one ground floor parking level.

With the introduction of the eight-story building, short-range views from street-level vantage points adjacent to the Project Site would be modified. The building would be more prominently visible, would be taller, and would have more perceived bulk than the existing low-rise structures. However, given the location of the Project Site and existing dense intervening development, the eight-story building and two two-story buildings would not block public short-range views of visual resources such as the nearby Los Angeles River or nearby historic resources. The increased height and mass of the buildings on the Project Site may be visible from more distant locations and may be within the same viewshed of the downtown Los Angeles skyline. However, given the distance to the downtown skyline, any such views are very limited and intermittent and are primarily only available from public roadways, and the Project would not completely obscure views of the skyline.

Based on the above, the Project would not have a substantial adverse impact on scenic vista. Therefore, no further evaluation 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. The Project Site is not located along a state scenic highway. The nearest officially eligible state scenic highway is along the Foothill Freeway (I-210), approximately 9.2 miles

northeast of the Project Site,[1] and the nearest City-designated scenic parkway is along Stadium Way between the I-5 and I-110 Freeways, approximately 2.6 miles north of the Project Site.[2] Therefore, the Project would not substantially damage scenic resources within a state or City-designated scenic highway. Therefore, no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above in Response to Checklist Question I.a, the Project vicinity currently lacks a thematic aesthetic character largely due to the transitional nature of the neighborhood. The area surrounding the Project Site contains an eclectic mix of buildings that vary in age, architecture, heights, massing, and materials. Additionally, buildings in the Project vicinity vary in age and physical condition, with some of the buildings in varying stages of disrepair and others that have been redeveloped as residential, office, and restaurant spaces. Furthermore, the surrounding uses in the Project vicinity include features that degrade the visual quality of the surrounding such as graffiti and dilapidated structures, which can both be found directly adjacent to the Project Site. The visual character of the Project area continues to transform and improve with new and on-going developments that incorporate both the historic and contemporary nature of the area.

Construction

Construction activities generally cause a temporary contrast to, and disruption in, the general order and aesthetic character of an area. Although temporary in nature, construction activities may cause a visually unappealing quality in a community. During construction activities for the Project, the visual appearance of the Project Site would be altered due to the removal of the existing structures and the presence of construction equipment. Some of the activity would be visible from roadways adjacent to the Project Site, as well as to viewers within nearby buildings. However, temporary construction fencing would be placed along the periphery of the Project Site to screen much of the construction activity from view at the street level, and graffiti would be removed, as needed, from all temporary walkways and construction fencing throughout the Project construction period. In addition, the Project Site does not include any trees, and no street trees are located within the public right-of-way. Thus, construction of the Project would not impact trees.

Overall, while affecting the visual character of the Project area on a short-term basis, Project construction activities would not substantially alter or degrade the existing visual character or quality of the Project Site and surrounding area, for the following reasons: (1) views of construction activity would be limited in duration and location; (2) the Project Site appearance would be typical of construction sites in urban areas; (3) construction would occur within an urban setting with a high level of human activity and development; and (4) construction fencing would be placed along the periphery of the Project Site to screen much of the construction activity from view at the street level.

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1 California Scenic Highway Mapping System, Los Angeles County, www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed January 9, 2018.

2 Mobility Plan 2035, Map A4, Citywide General Plan Circulation System—Central, Midcity Subarea.

Operation

As discussed above, the Project would remove three buildings and ancillary structures. As discussed in Response to Checklist Question V, below, the existing buildings to be removed are not historic resources. In addition, the buildings are not unique scenic resources. The existing buildings would be replaced with an eight-story building and two two-story buildings. As described in Part A, Project Description, of this Initial Study, the design of the Project is intended to convey a classic industrial architecture that draws from elements of the surrounding neighborhood. In particular, the Project would incorporate glass, masonry, and concrete to blend with the Arts District's industrial context while also allowing for a possible future connection to the Los Angeles River. The proposed building is characterized by staggered terraces that distinguish each of the eight levels of the high-rise building and break up the façade by providing setbacks from both Bay Street and Sacramento Street. In addition, the proposed internal pedestrian paseo would create a pedestrian linkage between Bay Street and Sacramento Street. Parking would be located within up to two subterranean levels and a ground floor level where parking would be screened from street view by commercial uses.

The Project would become part of the existing urban fabric, and the Project massing, height, and aesthetic character would be consistent with many of the existing and proposed commercial and residential structures in the vicinity of the Project Site. In particular, the building materials and the articulation of the building, which would include staggered terraces, would ensure that the building would blend into the existing streetscape. In addition, the proposed maximum height of up to eight stories and approximately 140.5 feet would be similar to other building heights in the vicinity, including the six-story building on the southeast corner of Bay Street and Santa Fe Avenue, located approximately 253 feet west of the Project Site . Furthermore, the Project area continues to change, with new and ongoing developments incorporating mixed uses with mid- and high-rise buildings of contemporary design. Overall, the Project would not be in substantial conflict with the surrounding visual environment in terms of building height, design, massing, or scale.

Proposed signage would include mounted project identity signage, building and commercial tenant signage, and general ground-level and wayfinding pedestrian signage. Wayfinding signs would be located at parking garage entrances, elevator lobbies, vestibules, and corridors. Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the Project Site and with the requirements of the LAMC. The proposed signage would not substantially degrade the existing visual character or quality of the Project Site or surrounding vicinity.

Based on the analysis above, the Project would not substantially degrade the existing visual character or quality of the Project Site or surrounding vicinity. Therefore, no further evaluation of this topic in an EIR is required.

Shading

As provided in the LA CEQA Thresholds Guide, the visual character or quality of a site and its surroundings can also be affected by shading cast upon adjacent areas by proposed structures. Shadows may provide positive effects, such as cooling effects during warm weather, or negative effects, such as the loss of natural light necessary for solar energy purposes, or the loss of warming influences during cool weather. Shadow effects depend on several factors, including the local

topography, height and bulk of a project's structural elements, sensitivity of adjacent land uses, existing conditions on adjacent land uses, season, and duration of shadow projection. According to the LA CEQA Thresholds Guide, facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional land uses (e.g., schools, convalescent homes); commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor dining areas; nurseries; and existing solar collectors. According to the LA CEQA Thresholds Guide, a proposed project would have a significant shading impact if shadow sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (between early November and early March), or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (between early March and early November).

As previously discussed, the Project vicinity is developed with a mix of light industrial, heavy industrial, warehouse, and commercial uses. Adjacent uses include textile and import businesses to the north, a surface parking lot to the east, knitting mills and fabric warehouses to the south, and a vehicle towing facility to the west. None of these uses are considered sensitive to shading and they do not contain routinely useable outdoor spaces including outdoor dining areas, patios, or pools. Therefore, the shadows to be generated by the Project would not substantially degrade the existing visual character or quality of the Project Site and its surroundings. For informational purposes, shading diagrams are provided in Appendix IS-1, of this Initial Study. Therefore, no further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site currently generates moderate levels of artificial light and glare typical of an urban area. Existing light sources within the Project Site include low-level security lighting, interior lighting emanating from the existing buildings, and vehicle headlights. Existing glare sources within the Project Site include glass and metal vehicle and building surfaces. The Project would introduce new sources of light and glare that are typically associated with commercial/office uses and that would be compatible with the existing buildings, including low-level exterior lighting on the buildings and along pathways for security and wayfinding purposes. Furthermore, the Project would include new low- and high-rise buildings, which would introduce an increased amount of nighttime lighting as compared to existing conditions. However, light levels from these buildings would be consistent with lighting from other nearby buildings. Thus, the Project would not create substantial light or glare that would adversely affect daytime or nighttime views in the area. Therefore, no further evaluation of this topic in an EIR is required.

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

II. AGRICULTURE AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies

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

may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

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

Would the project:

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

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles. As discussed in Part A, Project Description, of this Initial Study, the Project Site is currently developed with three buildings used for engineering and test development operations, office operations, and fabrication and machining operations. Other smaller on-site structures include converted shipping containers, tents for welding operations and meetings, and parking stackers. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are also not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency

Department of Conservation.[3] As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is zoned by the Los Angeles Municipal Code (LAMC) as M3-1-RIO (Heavy Manufacturing, River Improvement Overlay). The Project Site is not zoned for agricultural use. Furthermore, none of the surrounding properties are zoned for agricultural use. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.[4] Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an 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 previously discussed, the Project Site is located in an urbanized area and is currently developed with three buildings used for engineering and test development operations, office operations, and fabrication and machining operations. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for industrial uses and is not zoned and/or used as forest land.[5] Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As previously discussed, the Project Site is located in an urbanized area and does not include any forest land or timberland. Therefore, the Project would not result in the loss or conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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[3] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed January 4, 2018.

[4] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed January 4, 2018.

[5] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed January 4, 2018.

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles and does not include farmland. The Project Site and surrounding area are not mapped as farmland, are not zoned for farmland or agricultural use, and do not contain any agricultural uses.[6] As such, the Project would not result in the conversion of farmland to non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.				
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☒	☐	☐	☐
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☒	☐	☐	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
e. Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

Would the project:

a) Conflict with or obstruct implementation of the Air Quality Management Plan or Congestion Management Plan?

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (Air Basin). Within the Air Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal and state Clean Air Acts, to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [$PM_{2.5}$], PM_{10}, and lead[7]). The SCAQMD's 2016 Air Quality Management

[6] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed January 4, 2018.

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

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 issues relating to transportation, the economy, community development and the environment.[8] With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area.

Construction and operation of the Project may 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 the SCAQMD's implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project's consistency with the SCAQMD's AQMP.

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

Potentially Significant Impact. The Project would result in increased air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Construction-related pollutants would be associated with sources, such as construction worker vehicle trips, the operation of construction equipment, site grading and preparation activities, and the application of architectural coatings. During Project operation, air pollutants would be emitted on a daily basis from motor vehicle travel, natural gas consumption, and other on-site activities. Therefore, air quality standards could be violated and the EIR will provide further analysis of the Project's construction and operational air pollutant emissions.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Potentially Significant Impact. As discussed above, construction and operation of the Project would result in the emission of air pollutants in the Air Basin, which is currently in non-attainment of federal air quality standards for ozone, $PM_{2.5}$ and lead, and state air quality standards for ozone, particulate matter less than 10 microns in size (PM_{10}), and $PM_{2.5}$. Therefore, implementation of the Project could potentially increase criteria pollutant emissions, which could cause a cumulative impact in the Air Basin. The EIR will provide further analysis of cumulative air pollutant emissions associated with the Project.

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

d) Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. As discussed above, the Project would result in increased short- and long-term air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors in the Project area include live/work units within 500 feet of the Project Site. Therefore, the Project could expose sensitive receptors to substantial pollutant concentrations and the EIR will provide further analysis of the Project's potential to result in substantial adverse impacts to sensitive receptors.

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

Less Than Significant Impact. Construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction (e.g., equipment exhaust, off-gassing of asphalt, paint vapors, etc.) would be localized and temporary in nature and would not be sufficient to affect a substantial number of people.

With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. On-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts. Construction and operation of the Project would also comply with SCAQMD Rules 402, which provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.[9]

Based on the above, the project would not create odors affecting a substantial number of people. Therefore, the potential odor impact during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

[9] SCAQMD, Rule 402, Nuisance.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Would the project:

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

No Impact. The Project Site is located in an urbanized area and is currently occupied by three buildings used for engineering and test development operations, office operations, and fabrication and machining operations. As discussed in Attachment A, Project Description, of this Initial Study, the Project Site is relatively flat with limited ornamental landscaping. Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large

expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Based on the lack of habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife[10] or by the U.S. Fish and Wildlife Service[11] would be present on-site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles.[12] Therefore, the Project would not have any adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

No Impact. The Project Site is located in an urbanized area and is currently occupied by creative offices, production support, and sound stages. No riparian or other sensitive natural community exists on the Project Site.[13,14] Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.[15,16] In addition, there are no other sensitive natural communities identified by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service.[17,18,19] Although the Project Site is in proximity to the Los Angeles River, development of the Project would not have an adverse effect on any riparian habitat in the Los Angeles River since the Project would not encroach into the Los Angeles River and since the portion of the Los Angeles River near the Project Site is concrete lined and the primary areas of the river that presently support riparian habitat are the Sepulveda Basin (approximately 15 miles northwest of the Project area) and the Glendale Narrows (approximately 5 miles north of the Project Site).[20] Therefore, the Project would not have a

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10 California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, April 2017.

11 United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, https://ecos.fws.gov/ecp0/reports/species-listed-by-state-report?state=CA&status=listed, accessed January 4, 2018.

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

13 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed January 4, 2018.

14 U.S. Environmental Protection Agency, NEPAssist, www.epa.gov/nepa/nepassist, accessed January 5, 2018.

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

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

17 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), www.wildlife.ca.gov/Data/BIOS, accessed January 5, 2018.

18 California Department of Fish and Wildlife, CDFW Lands, https://www.wildlife.ca.gov/Lands, accessed January 5, 2018.

19 U.S. Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/index.html, accessed January 5, 2018.

20 City of Los Angeles, Los Angeles River Revitalization, Ecosystem, http://lariver.org/ecosystem, accessed February 2, 2018.

substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is located in an urbanized area and is currently occupied by creative offices, production support, and sound stages. In addition, the surrounding area has been fully developed, and the Los Angeles River further to the east of the Project Site is concrete lined. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site.[21] As such, the Project would not have an adverse effect on federally protected wetlands. No impact would occur, and no mitigation measures are required. Therefore, no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As described above, the Project Site is located in an urbanized area and is currently occupied by three buildings used for engineering and test development operations, office operations, and fabrication and machining operations. Based on the Tree Report included in Appendix IS-2 of this Initial Study, there are no trees on the property or within the public right-of-way that would be removed during construction of the Project. In addition, the areas surrounding the Project Site are fully developed, and there are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open spaces areas and that may serve as wildlife corridors. While the Los Angeles River is located further to the east of the Project Site, it is concrete-lined in its nearest stretch and is separated from the Project Site by rail facilities and fences. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.[22,23]

Based on the above, the Project would not 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. Impacts would be less than significant, and no mitigation measures are required. Therefore, no further evaluation of this topic in an EIR is required.

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21 U.S. Environmental Protection Agency, NEPAssist, www.epa.gov/nepa/nepassist, accessed January 5, 2018.

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

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

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The City of Los Angeles Protected Tree Ordinance (LAMC Chapter IV, Article 6) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least four inches in diameter at breast height. These tree species are defined as "protected" by the City of Los Angeles. 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.

Based on the Tree Report included in Appendix IS-2 of this Initial Study, no trees are located on-site or in the public right-of-way. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. No Impacts would occur, and no mitigation measures are required. No 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 in an urbanized area and is currently occupied by creative offices, production support, and sound stages. As described above, the Project Site does not support any habitat or natural community.[24,25] The Project Site is located west of the Los Angeles River and is within the River Improvement Overlay (RIO) District, Inner Core. Development of the Proposed Project would comply with the applicable development standards and guidelines for the RIO District, including landscaping guidelines, which would ensure that the Proposed Project does not conflict with a conservation plan.

No Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.[26] Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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[24] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed January 5, 2018.

[25] United States Environmental Protection Agency, NEPAssist, www.epa.gov/nepa/nepassist, accessed January 5, 2018.

[26] The Geotechnical Assessment prepared for the Project identifies the Puente Hills Blind Thrust Fault as being 1 mile from the Project Site. The City's ZIMAS report indicates the fault is located 0.7 mile from the Project Site. The fault is a buried fault with no surface trace, so variances in interpretation of the distances may occur. The distance provided in ZIMAS is the most conservative estimate.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	☒	☐	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☒	☐	☐	☐
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐
d. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Would the project:

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

Potentially Significant Impact. CEQA Guidelines Section 15064.5 generally defines a historical resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Public Resources Code Section 5020.1(k)); or (3) identified as significant in a historical resources survey (meeting the criteria in Public Resources Code Section 5024.1(g)). Additionally, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register. The local register of historical resources is managed by the Los Angeles Office of Historic Resources, which established SurveyLA, a comprehensive program to identify potentially significant historic resources throughout the City.

The buildings located on the Project Site were constructed between 1923 and 1941.[27] Based on the age of the on-site buildings and presence of known historical resources in the Project vicinity,

[27] Los Angeles County, Office of the Assessor, "Property Assessment Information System," http://maps.assessor.lacounty.gov/GVH_2_2/Index.html?configBase=http://maps.assessor.lacounty.gov/Geocortex/Essentials/REST/sites/PAIS/viewers/PAIS_hv/virtualdirectory/Resources/Config/Default, accessed May 3, 2018.

the Project has the potential to directly and indirectly affect historical resources. Therefore, the EIR will provide further analysis of the Project's potential 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. CEQA Guidelines Section 15064.5(a)(3)(D) 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 located within an urbanized area of the City of Los Angeles and has been subject to grading and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Nevertheless, it is estimated that approximately 140,000 cubic yards of export material would be hauled from the Project Site during the construction phase. Thus, the Project could have the potential to disturb previously undiscovered archaeological resources. Therefore, the EIR will provide further analysis of the Project's potential impacts to archaeological resources.

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

Potentially Significant Impact. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms that are now extinct. Public Resources Code Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources. Although the Project Site has been previously graded and developed, the Project would require additional grading and excavation which would have the potential to disturb previously undiscovered paleontological resources that may exist within the Project Site. Therefore, the EIR will provide further analysis of the Project's potential impacts to paleontological resources.

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

Less Than Significant Impact. Although no human remains are known to have been found on the Project Site, there is the possibility that unknown resources could be encountered during Project construction, particularly during ground-disturbing activities, such as grading and excavation. While the uncovering of human remains is not anticipated, if human remains are inadvertently discovered during construction, such resources would be treated in accordance with state law, including PRC Section 5097.98 and California Health and Safety Code Section 7050.5. Specifically, if human remains are encountered, work on the portion of the Project Site where remains have been uncovered would be suspended and the City of Los Angeles Public Works Department and the County Coroner would be immediately notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) would be notified within 24 hours, and the guidelines of the NAHC would be adhered to in the treatment and disposition of the remains.

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 activities, the Project's impact on human remains would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS. Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☐	☒
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, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
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?	☐	☐	☐	☒

The following analysis is based on the Preliminary Geotechnical Assessment (Geotechnical Assessment) prepared for the Project by Geotechnologies, Inc., dated November 21, 2017. All specific information on geologic and soils conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-3 of this Initial Study.

In 2015, the California Supreme Court in California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD), held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the project would have a significant impact related to geology and soils if it would result in any of the following impacts.

Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last

1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

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

Review of the earthquake fault zone maps within Los Angeles indicates that the Project Site is not located within an Alquist-Priolo Fault Zone Map or within a City-designated Fault Rupture Study Area.[28] The closest Alquist-Priolo Earthquake Fault Zone is the Hollywood Fault/Raymond Fault Zone, which is located approximately 5.7 miles to the north of the Project Site.[29] Therefore, the potential for surface rupture due to faulting occurring beneath the Project Site is considered low. Moreover, the Project would not exacerbate existing fault rupture conditions. Therefore, impacts associated with surface rupture from a known earthquake fault would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The Project Site is located within the seismically active region of Southern California and would potentially be subject to strong ground motion if a moderate to strong earthquake occurs on a local or regional fault. The effects of seismic ground shaking at the Project Site and in the Project area would not be exacerbated by the Project because the Project would not involve mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions that would exacerbate ground shaking. Furthermore, as discussed above, the Project Site is not located within an Alquist-Priolo Fault Zone. In addition, as discussed in the Geotechnical Assessment, the closest mapped nearby fault (an unnamed fault) is an east-west trending fault located approximately 1.2 miles north of the Project Site. However, as discussed further in the Geotechnical Assessment, this designated fault could not be corroborated or verified and thus need not be considered in the design of the Project. Regardless, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, impacts associated with seismic ground shaking would be less than significant, and no mitigation measures are required.

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[28] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed January 5, 2018.

[29] Geotechnologies, Inc., Preliminary Geotechnical Assessment, November 21, 2017, p. 5. See Appendix IS-3 of this Initial Study.

The following discussion about building and seismic codes is provided for informational purposes. Engineering design solutions reduce the substantial risk of exposing people or structures to loss or injury. As discussed in detail below, state and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. The Geotechnical Assessment contains preliminary recommendations for the type of engineering practices that would be used. Additionally, a final design-level geotechnical report must be prepared by the Project Applicant and reviewed to the satisfaction of the Department of Building and Safety before the issuance of grading permits. The final recommendations from that report will be enforced for the construction of the Project. Based on the Geotechnical Assessment, the Project Site is suitable for development, and the Project may be constructed using standard, accepted, and proven engineering practices considering the seismic shaking potential and geologic conditions at the Project Site. As with other development projects in the Southern California region, the Project would comply with the Los Angeles Building Code (LABC), which incorporates current seismic design provisions of the 2016 California Building Code with City amendments. The 2016 California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety is responsible for implementing the provisions of the LABC. The Project would also be required to comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety, including the recommendations provided in a final, site-specific geotechnical report. In addition, the state and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project.

Based on the above, development of the Project would not exacerbate existing seismic conditions on the Project Site. Impacts associated with seismic ground shaking would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low density, fine, clean sandy soils; and strong ground motion. Effects of liquefaction can include sand boils, settlement, and bearing capacity failures below structural foundations.

Neither the City of Los Angeles nor the State of California classifies the Project Site as part of a potentially liquefiable area.[30,31] In addition, the historic-high groundwater level at the Project Site is approximately 170 feet below ground surface. However, as discussed in the Geotechnical Assessment, a recent environmental investigation conducted in 2016 observed groundwater at a depth of 81 feet below the ground surface.[32] As discussed in the Geotechnical Assessment, based on other liquefaction analyses in the vicinity of the Project Site, the alluvial soils underlying the Project Site are typically not considered to be subject to liquefaction. It is therefore probable that the potential for liquefaction at the Project Site is likely low. Therefore, based on these considerations, the Project would not exacerbate existing environmental conditions and cause or accelerate geologic hazards related to liquefaction, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. As such, impacts associated with liquefaction would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. Landslides generally occur in loosely consolidated, wet soil, and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and generally characterized by flat topography. In addition, the Project Site is not located in a landslide area as mapped by the state[33] or the City of Los Angeles.[34,35] Development of the Project would not substantially alter the existing topography of the Project Site. Specifically, the Project Site would remain flat. Therefore, the Project would not exacerbate existing conditions that would result in the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Development of the Project would require grading and excavation and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. However, construction activities would occur in accordance with erosion control requirements, including grading and dust control measures, imposed by the City pursuant to grading permit regulations. Specifically, Project construction would comply with the Los Angeles Building Code, which requires permits, plans, plan

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30 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed January 5, 2018.

31 State of California, California Geological Survey, Seismic Hazard Zones. Los Angeles Quadrangle, March 25, 1999.

32 Fluctuations in the level of groundwater would be expected to occur over time due to variations in rainfall, temperature, and other factors.

33 State of California, California Geological Survey, Seismic Hazard Zones. Los Angeles Quadrangle, March 25, 1999.

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

35 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed January 5, 2018.

checks, and inspections to ensure that the Project would reduce the sedimentation and erosion effects. In addition, the Project would require an erosion control plan to be approved by the Los Angeles Department of Building and Safety, as well as a Storm Water Pollution Prevention Plan pursuant to National Pollutant Discharge Elimination System permit requirements. As part of the Storm Water Pollution Prevention Plan, Best Management Practices would be implemented during construction to reduce sedimentation and erosion levels to the maximum extent possible. Regarding soil erosion during Project operations, the potential for erosion is low since the Project Site would be fully developed and no soils would be left exposed. Therefore, with compliance with applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above, Project Site is not located near slopes or geologic features that would result in on- or off-site landsliding or lateral spreading. Additionally, as discussed in greater detail in Response to Checklist Question VI.a.iii above, based on the depth to groundwater, subsidence and liquefaction are unlikely at the Project Site. The Project would not exacerbate existing conditions since it would not cause a geologic unit or soil to become unstable. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. As discussed in the Geotechnical Evaluation, the Project Site is underlain with native alluvial soils that are typically dense or stiff and well consolidated, with expansion potential ranging from very low to low. Furthermore, construction of the Project would be required to comply with the California Building Code and supplemental requirements of the LAMC, as enforced by the City of Los Angeles. These requirements would include building foundation and other requirements appropriate to site-specific conditions that would be provided in accordance with the design level geotechnical investigation required by the City. Thus, the Project would not exacerbate existing environmental conditions with regard to expansive soil. Impacts with respect to expansive soils would be less than significant, and no mitigation measures are 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 within a community served by existing wastewater infrastructure. The Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or

alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Would the project:

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 (GHG) since they have effects that are analogous to the way in which a greenhouse retains heat. GHGs are emitted by both natural processes and human activities. The accumulation of GHGs in the atmosphere affects the earth's temperature. The state has undertaken initiatives designed to address the effects of GHG emissions and to establish targets and emission reduction strategies for GHG emissions in California. Activities associated with the Project, including construction and operational activities, could result in GHG emissions that may have a significant impact on the environment. Therefore, the EIR will provide further analysis of the Project's GHG 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 GHGs, 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 GHGs (e.g., Assembly Bill [AB] 32 and the City of Los Angeles Green Building Code).

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS.				
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☒	☐	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?	☒	☐	☐	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including, where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands, caused in whole or in part from the project's exacerbation of existing environmental conditions?	☐	☐	☒	☐

As discussed above, in 2015, the California Supreme Court in CBIA v. BAAQMD, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the Project. The revised thresholds are intended to comply with

this decision. Specifically, the decision held that an impact from the existing environment to the Project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the Project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the Project. For example, if construction of the Project on a hazardous waste site will cause the potential dispersion of hazardous waste in the environment, the EIR should assess the impacts of that dispersion to the environment. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the Project would have a significant impact related to hazards and hazardous materials if it would result in any of the following impacts.

Would the project:

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. The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. All potentially hazardous materials to be used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions and handled in accordance with all applicable standards and regulations, including but not limited to, those set forth by the federal and State Occupational Safety and Health Acts. Such requirements include obtaining material safety data sheets form 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. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. Impacts would be less than significant, and no mitigation measures are required. No further analysis 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?

Potentially Significant Impact. Industrial operations have been conducted at the Project Site since 1906. The existing site buildings were constructed in the 1920s, prior to the enactment of laws preventing the use of asbestos-containing materials (ACM), polychlorinated biphenyls (PCBs) and lead based paint (LBP). Therefore, these materials may be present on the Project Site. A Phase I ESA will be prepared for the Project Site, which will evaluate whether the Project Site contains conditions that may result in a significant hazard to the public or the environment. Thus, further analysis of potential uses associated with release of hazardous materials will be provided in the EIR.

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

Less Than Significant Impact. There are no schools located within a 0.25-mile radius of the Project Site. Metropolitan High School is located approximately 0.35 mile west of the Project Site at 727 Wilson Street and is separated from the Project Site by numerous structures and roadways. In addition, trucks that would be used to dispose of any hazardous materials from the Project Site would not be expected to pass by Metropolitan High School. As such, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within 0.25 mile of an existing or proposed school. Impacts would be less than significant and no mitigation measures would be required. No further evaluation of this topic in the 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, caused in whole or in part from the project's exacerbation of existing environmental conditions?

Potentially Significant Impact. Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions or extensive investigations are planned or have occurred. The database provides a listing of federal Superfund sites, State response sites, voluntary cleanup sites, and school cleanup sites.

Based on a preliminary review of the databases discussed above, the Project Site appears to be listed as a Permitted UST location. The Phase I ESA to be prepared for the Project will conduct a more detailed database search and investigation of property records and historical uses. Given the age of the buildings on-site and previous industrial uses, it is possible that the Project Site is listed on a hazardous materials site pursuant to Government Code Section 65962.5. Further analysis of this issue will be provided in the EIR.

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

No Impact. The Project Site is not located within an area subject to an airport land use plan or within 2 miles of an airport. The closest airport is the Hawthorne Municipal Airport, located approximately 9.3 miles southwest of the Project Site. Given the distance between the Project Site and the Hawthorne Municipal Airport, the Project would not have the potential to result in a safety hazard. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required. With regard to potential impacts to air traffic, see Checklist Question XVI.c, Transportation/Circulation, below.

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

No Impact. The Project Site is not located within the vicinity of a private airstrip. The nearest private airstrip is the Los Alamitos Army Airfield, located approximately 19 miles southeast of the Project Site. Given the distance between the Project Site and the Los Alamitos Army Airfield, the Project would not have the potential to result in a safety hazard. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. According to the Safety Element of the City of Los Angeles General Plan, the nearest disaster routes to the Project Site are the Hollywood Freeway (US-101), the Santa Monica Freeway (I-10), and the Golden State Freeway (I-5), which are all accessible within less than 1 mile of the Project Site. Alameda Street is also a designated disaster route located approximately 0.5 mile east of the Project Site.[36] While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access.

Operation of the Project would generate traffic in the Project vicinity and would result in some modifications to site access. However, the Project would comply with LAFD access requirements and would not impede emergency access within the Project vicinity. Furthermore, as discussed above, the closest disaster routes include Alameda Street, US-101, I-10, and I-5, which are all less than 1 mile from the Project Site. The Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. Impacts related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. There are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone[37] or within a City-designated fire buffer zone.[38] Therefore, the Project would not exacerbate conditions that would subject people or structures to a significant risk of loss, injury, or death as a result of

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

[37] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed January 8, 2018. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

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

exposure to wildland fires. Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief has the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; Section 57.118 of the LAMC establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects; and Section 57.507.3.1 establishes fire water flow standards. Additionally, the proposed uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required..

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements?	☒	☐	☐	☐
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☒	☐	☐	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☒	☐	☐	☐
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☒	☐	☐	☐
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☒	☐	☐	☐
f. Otherwise substantially degrade water quality?	☒	☐	☐	☐
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐
j. Inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐

Would the project:

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

Potentially Significant Impact. Construction activities associated with the Project would have the potential to result in the conveyance of pollutants into the adjacent Los Angeles River and municipal storm drains, particularly during precipitation events. In addition, potential changes in on-site drainage patterns resulting from Project operation and the introduction of new land uses could affect the quality and quantity of storm water runoff. Given the Project Site's proximity to the Los Angeles River, further analysis of this issue will be included in the EIR.

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

Potentially Significant Impact. It is anticipated that the Project would result in a similar amount of on-site impermeable areas compared to existing conditions due to the nature of the existing site as predominately impervious. Nevertheless, the potential exists for existing percolation of rainwater and irrigation water into the water table to be diminished, which could affect groundwater recharge. Therefore, further analysis of this topic will be included in the EIR.

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

Potentially Significant Impact. The Project Site is currently developed with commercial and light industrial buildings and is adjacent to a concrete-lined portion of the Los Angeles River. No streams or rivers cross the Project Site. The Project would involve the demolition of the existing uses, construction of new buildings, and the installation of new landscaped areas, which would have the potential to alter the existing drainage pattern of the Project Site. Therefore, further analysis of this issue will be included in the EIR.

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

Potentially Significant Impact. See Response to Checklist Question IX.c, above.

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

Potentially Significant Impact. See Response to Checklist Questions IX.a and IX.c, above.

f) Otherwise substantially degrade water quality?

Potentially Significant Impact. See Response to Checklist Question IX.a, above.

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

No Impact. The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles.[39,40] The Project Site is located in Zone X (Other Flood Areas), which are areas of 0.2 percent chance flood; areas of 1 percent annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1 percent annual chance flood. In addition, the Project does not propose residential uses. Thus, the Project would not place housing within a 100-year flood hazard area. No impacts would occur, and no mitigation would be required. No further analysis of this topic in an EIR is required.

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

No Impact. As discussed above in Response to Checklist Question IX.g, the Project Site is not located within a designated 100-year flood hazard area. Thus, the Project would not place structures that would impede or redirect flood flows within a 100-year flood hazard area. No impacts would occur, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above, the Project Site is not located within a designated 100-year flood plain as mapped by the Federal Emergency Management Agency (FEMA)

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[39] Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C1636F, effective September 26, 2008.

[40] City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit F, November 26, 1996, p. 57.

or by the City of Los Angeles. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a flood control basin.[41] However according to the "Los Angeles County Drainage Area Review Draft Feasibility Report" dated December 1991 by the U.S. Army Corps of Engineers, the Project Site may be subject to a 100-year flood due to a limitation in the capacity of the Los Angeles River channel. In addition, according to the Safety Element of the Los Angeles City General Plan, the Project Site within a potential inundation area in the event of failure of the Los Angeles River flood control system.[42] The nearest levee is along the Los Angeles River located approximately 250 feet east of the Project Site. The U.S. Army Corps of Engineers operates and maintains the 22.5-mile stretch of the Los Angeles River between Lankershim Boulevard in Hollywood and Stuart and Grey Road in Downey, which includes the portion adjacent to the Project Site. Their maintenance activities include inspection and cleaning of the channel walls and removing vegetation growing in cracks and joints. In addition, the U.S. Army Corps of Engineers has directed repair of damaged embankments upstream of the Project Site and has installed barriers for those portions of the channel that were identified as at greatest risk of flood waters during the 2015/2016 El Nino storm season. With continued inspection, maintenance and flood control activities, the potential for substantial adverse impacts related to inundation at the Project Site due to proximity to the Los Angeles River would be less than significant. In addition, to further address the potential for flooding on the Project Site, the proposed buildings would be set on a podium. Specifically, the buildings' finished floor would be raised approximately two feet above the existing grade along Bay Street and approximately four feet above existing grade along Sacramento Street. Therefore, the Project would not expose people or structures to a significant risk of loss, injury or death involving flooding. Impact would be less than significant in this regard and no further evaluation of this topic in an EIR is required.

j) Inundation by seiche, tsunami, or mudflow?

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

The Project Site is located approximately 14 miles east of the Pacific Ocean. In addition, the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.[43] The Los Angeles River is located approximately 250 feet to the east, but includes a sunken concrete lined channel and there are no major water-retaining structures located immediately up-gradient from the Project Site. Thus, inundation as a result of seiche is considered unlikely. As discussed above, the Project Site and surrounding area are fully developed and generally characterized by flat topography. Given the fact that the Project Site is not mapped by either the State or the City as being located in an area prone to landslides, the potential for the Project Site to be inundated by mudflows is low. Therefore, no seiche, tsunami, or mudflow events would be

41 City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit G, November 26, 1996, p. 59.

42 City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit G, November 26, 1996, p. 59.

43 City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit G, November 26, 1996, p. 59.

expected to impact the Project Site. Impacts would be less than significant and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	☐	☐	☒	☐
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

Would the project:

a) Physically divide an established community?

Less Than Significant Impact. As discussed in Part A, Project Description, of this Initial Study, the Project Site is located in a highly urbanized area that is developed with a mix of light industrial, heavy industrial, warehouse, and commercial uses. Adjacent uses include textile and import businesses to the north, a surface parking lot to the east, knitting mills and fabric warehouses to the south, and a vehicle towing facility to the west. All proposed development would occur within the boundaries of the Project Site as it currently exists and the Project does not propose a freeway or other large infrastructure that would divide a community. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

Potentially Significant Impact. As discussed in Part A, Project Description of this Initial Study, the Project requires discretionary approvals, including, but not limited to, a Vesting Zone and Height District Change, a Vesting Tentative Tract map, Site Plan Review, a Master Conditional Use Permit, and a Zoning Administrator's Adjustment. Therefore, the EIR will provide further analysis of whether the Project conflicts with applicable land use plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect.

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

No Impact. The Project Site is located in an urbanized area and is currently occupied by creative office, office, and light industrial uses. As discussed above in Checklist Question IV, Biological Resources, the Project Site does not include any trees or mature landscaping that support any habitat or natural community. As discussed above in Checklist Question IV, Biological Resources, the Project Site is located west of the Los Angeles River and is within the RIO District. Development of the Proposed Project would comply with the applicable development standards and guidelines for the RIO District, including landscaping guidelines, which would ensure that the Proposed Project does not conflict with a conservation plan. No Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.[44, 45] Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

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?

No Impact. No mineral extraction operations currently occur on the Project Site. The Project Site is located within an urbanized area and has been previously disturbed by development. As such, the potential for mineral resource recovery to occur on-site is low. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.[46,47]

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[44] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed February 7, 2018.

[45] California Department of Fish and Wildlife, California Regional Conservation Plans, July 2017, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, accessed February 7, 2018.

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

The Project Site is also not located within a City-designated oil field or oil drilling area.[48] Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.[49,50,51] The Project Site is also not located within a City-designated oil field or oil drilling area.[52, 53] Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐

47 State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

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

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

50 State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

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

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

53 California Division of Oil, Gas and Geothermal Resources, 2017, Online Well Finder, http://maps.conservation.ca.gov/doggr/#close, accessed January 5, 2018.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Would the project result in:

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

Potentially Significant Impact. The Project Site is located within an urbanized area that contains various sources of noise. During construction activities associated with the Project, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. In addition, because the Project would introduce new permanent commercial uses to the Project Site, noise levels from on-site sources may also increase during operation of the Project. Furthermore, traffic attributable to the Project has the potential to increase noise levels along adjacent roadways. Therefore, further evaluation of this topic will be provided in the EIR.

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

Potentially Significant Impact. Construction of the Project could generate groundborne noise and vibration associated with demolition, site grading, other clearing activities, the installation of building footings, and construction truck travel. As such, the Project would have the potential to generate and expose people to excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further evaluation of this topic will be provided in the EIR.

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

Potentially Significant Impact. As discussed in Response to Checklist Question XII.a, above, human activity associated with the Project would have the potential to increase ambient noise levels above existing levels. Therefore, further evaluation of this topic will be provided in the EIR.

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

Potentially Significant Impact. As discussed above in Response to Checklist Questions XII.a and XII.b, construction activities associated with the Project would have the potential to temporarily or periodically increase ambient noise levels above existing levels. Therefore, further evaluation of this topic will be provided in the EIR.

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

No Impact. The Project Site is not located within an airport land use plan or within 2 miles of an airport. The closest airport to the Project Site is the Hawthorne Municipal Airport, located approximately 9.3 miles southwest of the Project Site. Given the distance between the Project Site and the Hawthorne Municipal Airport, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is not located within the vicinity of a private airstrip. The nearest private airstrip is the Los Alamitos Army Airfield, located approximately 19 miles southeast of the Project Site. Given the distance between the Project Site and the Los Alamitos Army Airfield, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. POPULATION AND HOUSING. Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Would the project:

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

Less Than Significant Impact. The Project would result in the construction of creative office, retail, restaurant, and event and meeting space uses. Since the Project does not propose a housing component, it would not directly induce a new residential population that would contribute to population growth in the vicinity of the Project Site. Additionally, while construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project.

With regards to operation of the Project, while the employment opportunities generated by the proposed creative office, retail, and restaurant uses may be filled to some extent by employees already residing in the vicinity of the Project Site, it is also possible that some of the jobs created by the proposed uses would be filled by persons moving into the surrounding area, and housing demand associated with the Project could increase. However, it is anticipated that some of this demand would be filled by then-existing vacancies in the housing market, and some from other new units in nearby developments. Therefore, given that the Project would not directly contribute to population growth in the Project area and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. As such, the Project would not result in a notable increase in demand for new housing, and any new demand, should it occur, would be minor in the context of forecasted growth for the City of Los Angeles. Further, as the Project would be located in a highly developed area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

Based on the above, the Project would not induce substantial population or housing growth. Impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As no housing currently exists on the Project Site, the Project would not displace any existing housing. No impacts would occur and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As no housing currently exists on the Project Site, the development of the Project would not cause the displacement of any persons or require the construction of housing elsewhere. No impact would occur and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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?

Potentially Significant Impact. The LAFD provides fire protection and emergency medical services for the Project Site. The Project would increase the building square footage on-site and introduce a high-rise structure, which has the potential to result in an increased demand for fire protection services and associated facilities. Therefore, further analysis of this issue will be included in the EIR.

b) Police protection?

Potentially Significant Impact. Police protection for the Project Site is provided by the City of Los Angeles Police Department. The closest police station to the Project Site is the Central Community Police Station located at 251 E. 6th Street, approximately 1.5 mile northwest of the Project Site. The Project would introduce new creative office, retail, restaurant, and event and meeting space uses to the Project Site and, as a result, would increase the daytime population in the service area. This could result in the need for additional police services and associated facilities. Therefore, further analysis of this issue will be included in the EIR.

c) Schools?

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). LAUSD is divided into six local districts.[54] The Project Site is located in Local District–East.[55] As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD. In addition, the number of students that may be indirectly generated by the Project that could attend LAUSD schools serving the Project Site would not be anticipated to be substantial because not all employees of the Project are likely to reside in the vicinity of the Project Site. Furthermore, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Thus, the Project would not result in the need for new or altered school facilities. Therefore, impacts would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

d) Parks?

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include: Arts District Park (1.0 mile north); Boyle Heights Sports Center (1.3 miles east); Gladys Park (1.3 miles northwest); Hollenbeck Park & Recreation Center (1.4 miles northeast); Pecan Pool & Recreation Center (1.7 miles north); Costello Pool & Recreation Center (1.7 miles southeast); Roosevelt Pool (1.8 miles northeast); Ross Valencia Community Park (1.8 miles northeast); Ramon Garcia Recreation Center (2.0 miles east); and Central Park Recreation Center (2.0 miles southwest).

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. While it is possible that some of the new employees that could be generated by the Project may utilize local parks and recreational facilities, this increased demand would be negligible due to the amount of time it would take for employees to access off-site local parks which are at least 1 mile away. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, while the Project's employment opportunities could have the potential to indirectly increase the population of the Central City North Community Plan area, new demand for public parks and recreational facilities associated with Project development would be limited. Therefore, impacts on parks would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

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[54] Los Angeles Unified School District, Board of Education Districts Maps 2015-2016, http://achieve.lausd.net/Page/8652, accessed January 5, 2018.

[55] Los Angeles Unified School District, Board of Education Local District—East Map, July 2015.

e) Other public facilities?

Less Than Significant Impact. Other public facilities provided to the Project Site include library services and use of public roadways.

The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through Web-based resources.[56] The Project area is served by existing LAPL facilities including the Benjamin Franklin Branch Library (1.8 miles northeast), the Little Tokyo Branch Library (1.8 miles northwest), and the Los Angeles Central Library (2.4 miles northwest). As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of residents within the service population of the local LAPL facilities. In addition, Project employees would have internet access to LAPL and other web-based resources, decreasing the demand on library facilities. Furthermore, as Project employees would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. Therefore, impacts on library facilities would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

During construction and operation of the Project, roads would continue to be utilized to access the Project Site. As discussed below in Checklist Question XVI.a, further analysis of the potential for the Project to result in a significant increase in the number of vehicle trips on local roadways will be evaluated in the transportation/traffic section of the EIR. Any necessary improvements to local roadways associated with development of the Project will also be identified in the transportation/traffic section of the EIR.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

[56] Los Angeles Public Library, Library Directory.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

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

Less Than Significant Impact. As described above in Response to Checklist Question XIV.d, several public parks and recreational facilities are located in the vicinity of the Project Site. However, the Project does not propose the development of residential uses that would create a demand on nearby parks and/or recreational facilities. While it is possible that some of the Project's new employees may utilize local parks and recreational facilities, this increased demand would be negligible due to the amount of time it would take for employees to access off-site local parks and recreational facilities. Furthermore, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, while the Project's employment opportunities could have the potential to indirectly increase the population of the Central City North Community Plan area, new demand for public parks and recreational facilities associated with Project development would be limited.

Based on the above, the Project would not substantially increase the demand for off-site public parks and recreational facilities, such that substantial physical deterioration of those facilities would occur or be accelerated. The impact on parks and recreational facilities would be less than significant and mitigation measures would not be required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project would not include the development of recreational facilities or require the expansion of recreational facilities, as discussed above in Response to Checklist Question XIV.d. Therefore, no impact would occur and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC. Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☒	☐	☐	☐
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☒	☐	☐	☐
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☒	☐
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e. Result in inadequate emergency access?	☐	☐	☒	☐
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☒	☐	☐	☐

Would the project:

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

Potentially Significant Impact. The Project proposes development that has the potential to result in an increase in daily and peak-hour traffic within the vicinity of the Project Site. In addition, construction of the Project has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. Once construction is

completed, the Project's employees and visitors would generate vehicle and transit trips throughout the day. The resulting increase in the use of the area's transportation facilities could affect the capacity of the roadway and transit system. Therefore, further analysis of this issue will be provided in the EIR.

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

Potentially Significant Impact. In Los Angeles County, Metro administers the Congestion Management Program (CMP), a State-mandated program designed to address the impacts urban congestion has on local communities and the region as a whole. The CMP provides an analytical basis for the transportation decisions contained in the State Transportation Improvement Program. The CMP for Los Angeles County requires an analysis of any Project that could add 50 or more trips to any CMP intersection or more than 150 trips to a CMP mainline freeway location in either direction during either the A.M. or P.M. weekday peak hours. Implementation of the Project has the potential to generate additional vehicle trips, which could potentially add more than 50 trips to a CMP roadway intersection or more than 150 trips to a CMP freeway segment. Therefore, further analysis of this issue will be provided in the EIR.

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

Less Than Significant Impact. The Project proposes a new 140.5-foot tall, 8-story high-rise building and two two-story buildings. These building heights are less than 200 feet in height and thus would not be subject to FAA noticing requirements. Additionally, the Project does not propose any uses that would increase the frequency of air traffic. Impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

No Impact. The Project's design does not include hazardous design features. The roadways adjacent to the Project Site are part of the existing urban roadway network and contain no sharp curves or dangerous intersections due to design features. In addition, the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. Furthermore, the design and implementation of new driveways would comply with the City's applicable requirements, including emergency access requirements set forth by the LAFD. The Project design would also be reviewed by LADBS and the LAFD during the City's plan review process to ensure all applicable requirements are met. Moreover, the Project would not introduce incompatible uses such as farm equipment to the Project Site. Therefore, no impacts associated with hazardous design features or incompatible uses would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

e) Result in inadequate emergency access?

Less Than Significant Impact. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. In addition, the Project Site is located at the eastern termini of Bay Street and Sacramento Street and there is no through traffic on these streets. Thus, the Project does not have the potential to restrict access of emergency vehicles to any locations other than the uses located at the termini of Bay Street and Sacramento Street. Furthermore, appropriate construction traffic control measures (e.g. detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways. Additionally, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Since emergency access to the Project Site would remain unobstructed during construction of the Project, impacts related to emergency access would be less than significant.

Operation of the Project would generate traffic in the Project vicinity and would result in some modifications to site access. However, the Project's driveways and internal circulation would be designed to incorporate all City Building Code, Fire Code, and LADOT requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. Therefore, the Project would not result in inadequate emergency access. Impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

Potentially Significant Impact. The Project Site is served by a variety of transit options. The development of the Project would increase demand for alternative transportation modes in the vicinity of the Project Site. Therefore, further analysis of the potential for the Project to conflict with adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities will be provided in the EIR.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRIBAL CULTURAL RESOURCES.				
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☒	☐	☐	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

Would the project:

a.i) 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)?

a.ii) 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. Approved by Governor Jerry Brown on September 25, 2014, Assembly Bill 52 establishes a formal 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 Assembly Bill 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.

The Project would require excavations up to 42 feet below grade. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with Assembly Bill 52, the City will notify all applicable tribes and will participate in any requested consultations. Further analysis of this topic will be provided in the EIR.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☒	☐	☒	☐
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☒	☐	☐	☐
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☒	☐	☐	☐
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g. Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

The following analysis is based in part on the Utility Infrastructure Technical Report: Wastewater *(Wastewater Report) prepared for the Project KPFF Consulting Engineers, dated March 13, 2018. This report is included as Appendix IS-4 of this Initial Study.*

Would the project:

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

Less Than Significant Impact. Wastewater collection and treatment services within the Project vicinity are provided by the City of Los Angeles Department of Public Works (LADPW). Wastewater generated during Project operation would be collected and discharged evenly into the existing 8-inch sewer main in Bay Street and 8-inch sewer main in Sacramento Street and conveyed to the Hyperion Treatment Plant (HTP) located in the City of El Segundo.[57] The HTP is part of the Hyperion Treatment System, which also includes the Tillman Water Reclamation Plant (TWRP), and the Los Angeles–Glendale Water Reclamation Plant (LAGWRP). The treatment capacity of the entire Hyperion Service Area is approximately 550 million gallons per day (consisting of 450 million gallons per day at the HTP, 80 million gallons per day at TWRP Plant, and 20 million gallons per day at LAGWRP).[58] The HTP is designed to treat approximately 450 million gallons per day of wastewater for full secondary treatment and currently treats approximately 275 million gallons per day.[59] As such, the HTP is currently operating at approximately 61 percent of its capacity, with a remaining available capacity of approximately 175 million gallons per day.

Incoming wastewater to the treatment plant initially passes through screens and basins to remove coarse debris and grit. This is followed by primary treatment, which is a physical separation process where heavy solids settle to the bottom of tanks while oil and grease float to the top. These solids, called sludge, are collected, treated, and recycled. The portion of water that remains, called primary effluent, is treated through secondary treatment using a natural, biological approach. Living micro-organisms are added to the primary effluent to consume organic pollutants. These micro-organisms are later harvested and removed as sludge.[60] Treated water from the HTP is discharged

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57 Utility Infrastructure Technical Report: Wastewater, KPFF Consulting Engineers, January 16, 2018. See Appendix IS-4 of this Initial Study.

58 LASAN, Wastewater System Fact Sheet.

59 LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=grj40dmqj_1780&_afrLoop=3950078628628745#!, accessed January 11, 2018.

60 LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=grj40dmqj_1780&_afrLoop=3950078628628745#!, accessed January 11, 2018.

through an outfall pipe 5 miles into the Santa Monica Bay and Pacific Ocean.[61] The discharge from the HTP into Santa Monica Bay is regulated by the Hyperion Water Reclamation Plant's National Pollutant Discharge Elimination System (NPDES) Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board's (RWQCB) requirements for a recreational beneficial use.[62] Accordingly, the HTP's effluent that is released to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed water quality standards. The City's Environmental Monitoring Division also monitors flows into the Santa Monica Bay.[63]

The wastewater generated by the Project would be typical of office, retail, restaurant, and event and meeting space uses. No industrial discharge into the wastewater system would occur. As the HTP is in compliance with the state's wastewater treatment requirements, the Project would not exceed the wastewater treatment requirements of the RWQCB. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Potentially Significant Impact (Water)/Less Than Significant Impact (Wastewater). Water and wastewater systems consist of two components, the source of the water supply or place of sewage treatment, and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site. Given the Project's increase in the amount of developed floor area on the Project Site and the potential corresponding increase in water demand, further analysis of the Project's water demand and associated demand on the water infrastructure serving the Project Site will be provided in the EIR.

With regard to wastewater, wastewater generated by the Project would be conveyed by the existing wastewater conveyance systems for treatment at the HTP. As described above, the Hyperion Treatment Plant has a capacity of 450 mgd. The HTP currently processes an average of 275 mgd, and therefore has an available capacity of approximately 175 mgd.[64] As shown in Table B-1 on page B-49, based on sewage generation factors established by LADPW Bureau of Engineering, the Project would generate a net of approximately 64,888 gallons of wastewater per day, or approximately 0.065 mgd, upon completion. The Project's average daily wastewater flow of 0.065 million gallons per day would represent approximately 0.04 percent of the current 175 million gallons per day available

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61 California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2010-0200, NPDES No. CA0109991, Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean.

62 California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2010-0200, NPDES No. CA0109991, Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean.

63 LASAN, Environmental Monitoring, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-wp-ec-em?_adf.ctrl-state=xsmd2kqwx_131&_afrLoop=2110506477220768 3#!, accessed January 11, 2018.

64 LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=grj40dmqj_1780&_afrLoop=3950078628628745#!, accessed January 11, 2018.

Table B-1
Estimated Project Wastewater Generation

Land Use	No. of Units/ Floor Area	Wastewater Generation Factor (gpd/unit)	Total Wastewater Generation (gpd)
Existing			
Office	7,106 sf	0.12	853
Light Industrial	16,222 sf	0.05	811
Creative Office	16,000 sf	0.12	1,920
Total Existing			3,584
Proposed			
Creative Office	202,954 sf	0.12	24,354
Auditorium	216 seats[a]	3	648
Restaurant: Full Service Indoor	1,067 seats[a]	30	32,010
Restaurant: Full Service Outdoor	382 seats[a]	30	11,460
Total Proposed			**68,472**
Less Existing to be Removed			**(3,584)**
Net Wastewater Generation (Proposed – Existing)			**64,888**

sf = square feet
[a] *Assumed 15 square feet per person to estimate existing seat count.*
Source: KPFF Consulting Engineers, 2018.

capacity of the HTP.[65] Therefore, Project-generated wastewater would be accommodated by the existing capacity of the HTP.

Sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing sewer main adjacent to the Project Site. Installation of wastewater infrastructure would be limited to on-site wastewater distribution and minor off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work is required to connect to the public main. Therefore, a construction management plan would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining two lanes of travel and ensuring safe and emergency vehicle access. Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable City and California Plumbing Code standards. Based on the Sewer Capacity Availability Request submitted as part of the Wastewater Report, the existing sanitary sewer

[65] Utility Infrastructure Technical Report: Wastewater, KPFF Consulting Engineers, January 16, 2018. See Appendix IS-4 of this Initial Study.

lines in the vicinity of the Project Site (i.e., Bay Street and Sacramento Street) would have adequate capacity to accommodate the Project.[66]

Based on the above, the existing wastewater infrastructure is anticipated to have adequate capacity to the serve the Project. Thus, impacts to wastewater treatment facilities would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Potentially Significant Impact. As discussed above in Response to Checklist Question IX.a., potential changes in on-site drainage patterns resulting from Project operation and the introduction of new land uses could affect the quantity of storm water runoff. Further analysis of this issue will be included in the EIR.

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

Potentially Significant Impact. LADWP supplies water to the Project Site. The Project would increase the demand for water provided by LADWP. Therefore, further analysis of this issue in an EIR will be provided.

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

Less Than Significant Impact. As discussed above in Response to Checklist Question No. XVIII.b, wastewater generated during Project operation would be collected and discharged into the existing sewer main and conveyed to the HTP. Based on the amount of wastewater expected to be generated by the Project and future wastewater treatment capacity, adequate wastewater treatment capacity would be available to serve the Project Site together with projected future demand and existing commitments. As such, the Project would have a less than significant impact with respect to wastewater treatment and infrastructure, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. While the Bureau of Sanitation generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers

[66] Utility Infrastructure Technical Report: Wastewater, KPFF Consulting Engineers, January 16, 2018.

is either recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County are categorized as either Class III or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills.[67] Ten (10) Class III landfills and one inert waste landfill with solid waste facility permits are currently operating within the County.[68] In addition, there are two solid waste transformation facilities within Los Angeles County that convert, combust, or otherwise process solid waste for the purpose of energy recovery.

In 2016, the City of Los Angeles disposed of approximately 2.71 million tons of solid waste at the County's Class III landfills and approximately 44,942 tons at transformation facilities.[69,70] The 2.71 million tons of solid waste accounts for approximately 3.17 percent of the total remaining capacity (85.45 million tons) for the County's Class III landfills open to the City as of December 31, 2016.[71,72]

The permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility currently has 56.34 million tons of remaining capacity and an average daily in-County disposal rate of 897 tons per day.[73]

Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan (ColWMP) Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.[74] Based on the most recent 2016 ColWMP Annual Report, the remaining total disposal capacity for the County's Class III landfills is estimated at 103.18 million tons.

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67 Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

68 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017. The 10 Class III landfills within the County include the Antelope Valley Landfill, the Burbank Landfill, the Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, San Clemente Landfill, Savage Canyon Landfill, the Scholl Canyon Landfill, and the Sunshine Canyon City and County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

69 These numbers represent waste disposal, not generation, and thus do not reflect the amount of solid waste that was diverted via source reduction and recycling programs within the City.

70 County of Los Angeles, Department of Public Works, Solid Waste Information System, Detailed Solid Waste Disposal Activity Report By Jurisdictions by Los Angeles (Reporting Period: January 2016 to December 2016).

71 (2.71 million tons ÷ 85.45 million tons) X 100 = 3.17 percent.

72 County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017, Appendix E-2 Table 1.

73 County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017.

74 County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017.

Based on the 2016 CoIWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2031 will exceed the 2016 remaining permitted Class III landfill capacity of 103 million tons. Therefore, the Annual Report evaluated seven scenarios to increase capacity and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with six of the seven scenarios. Only the scenario involving utilization of permitted in-county disposal capacity only would result in a shortfall. The Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling, expand existing landfills, study, promote, and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail. The City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.[75] The City of Los Angeles is currently diverting 76 percent of its waste from landfills.[76] The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.

The following analysis quantifies the Project's construction and operation solid waste generation.

Construction

The Project Site is currently developed with three buildings that total 39,328 square feet of floor area. To provide for the proposed Project, the three buildings would be removed. The Project proposes a creative campus comprised of 202,954 square feet of creative office space, 16,000 square feet of retail and restaurant space, and 3,235 of event and meeting space. In addition, 711 vehicle parking spaces would be provided in up to two subterranean parking levels and one ground floor parking level. Overall, the Project proposes the construction of 222,189 square feet of floor area, resulting in a net increase of approximately 182,861 square feet of floor area upon buildout.

Pursuant to the requirements of Senate Bill 1374,[77] the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the inert waste landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. As shown in Table B-2 on page B-53, after accounting for mandatory recycling, the Project would result in approximately 3,486 tons of construction and demolition waste. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 56.34 million tons, as well as the

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75 City of Los Angeles, Solid Waste Integrated Resource Plan FAQ.

76 LA Sanitation, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afrLoop=1885068648914941l#!, accessed January 12, 2018.

77 Senate Bill 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.

Table B-2
Project Demolition and Construction Waste Generation

Building	Size	Generation Rate (lbs/sf)[a,b]	Total (tons)[b]
Construction Waste			
Creative Office	202,954 sf	3.89	395
Retail/Restaurant	16,000 sf	3.89	37
Event and Meeting Space	3,235 sf	3.89	6
Total Construction Waste			**438**
Demolition Waste			
Office	7,106 sf	155	551
Creative Office	16,000 sf	155	1,240
Light Industrial	16,222 sf	155	1,257
Total Demolition Waste			**3,048**
Total for Construction and Demolition Waste			**3,486**
Total After 75-Percent Recycling			**872**

lb = pound

sf = square feet

Numbers may not sum due to rounding.

[a] *U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.*

[b] *Numbers have been rounded to the nearest whole number.*

Source: Eyestone Environmental, 2018.

remaining 85.45 million tons of capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

Operation

As shown in Table B-3 on page B-54, the Project's net increase in solid waste generation would be approximately 733 tons of solid waste per year. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with AB 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste LA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent

Table B-3
Estimated Project Solid Waste Generation

Building	Size	Employees per 1,000 sf[a]	Estimated No. of Employees[c]	Solid Waste Generation Rate[b]	Total Generation (tons/year)[c]
Existing to be Removed					
Office	7,106 sf	4.79	34	0.73 tons/emp/yr	25
Creative Office	16,000 sf	4.79	46	0.73 tons/emp/yr	56
Light Industrial	16,222 sf	1.35	31	1.67 tons/emp/yr	37
Total Existing					**117**
Proposed					
Creative Office	202,954 sf	4.79	981	0.73 tons/emp/yr	710
Retail/Restaurant	16,000 sf	2.71	52	2.98 tons/emp/yr	129
Event/Meeting Space	3,235 sf	4.79		0.73 tons/emp/yr	11
Total Project					**850**
Total Net Increase					**733**

emp = employee

sf = square feet

Numbers may not sum due to rounding.

[a] *Based on employment generation factors from Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017, Table 14. Assumes employee generation rate of 0.00135 employee per square foot (Industrial Park) for light industrial uses, 0.00479 employee per square foot (Standard Commercial Office) for office/creative office and event/meeting space uses, and 0.00271 employee per average square foot (Neighborhood Shopping Centers) for retail and restaurant uses.*

[b] *Non-residential yearly solid waste generation factors are from City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002. Assumes solid waste generation rate of 1.67 tons per employee per year (Manufacturing—Other) for light industrial uses, 0.73 tons per employee per year (Services—Other) for office/creative office and event/meeting space uses, and 2.98 tons per employee per year (Retail—Restaurants) for retail/restaurant uses.*

[c] *Numbers have been rounded.*

Source: Eyestone Environmental, 2018.

by the year 2025.[78] The estimated annual net increase in solid waste that would be generated by the Project represents approximately 0.03 percent of the City's annual solid waste disposal[79] and approximately 0.0009 percent of the remaining capacity for the County's Class III landfills open to the

[78] The Zero Waste LA Franchise System would divide the City into 11 zones and designate a single trash hauler for each zone. Source: LA Sanitation, "Zero Waste LA—Franchise," www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwlaf;jsessionid=nJABd_CcLHL4DCOkGSCJWv1buV9atyQtoUkP50TwYHe5jczy6OaK!782088041!NONE?_afrLoop=17071741526736871&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D17071741526736871%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dge1mehnju_4, accessed December 13, 2017.

[79] 761 tons per year/2.71 million tons per year x 100 = 0.03%

City of Los Angeles.[80] The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of the County's Class III landfills.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation of the Project. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills.

In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste[81] on and after April 1, 2016, depending on the amount of waste generated per week. Beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would comply with and be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171687), which requires that development projects include an on-site recycling area or room of specified size.[82] The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be

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80 761 tons per year/85.45 million tons x 100 = 0.0009%

81 Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

82 Ordinance No. 171687, adopted by the Los Angeles City Council on August 6, 1997.

less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
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 degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact. As discussed above, the Project is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. No sensitive plant or animal community or special status species occur on the Project Site. However, the Project does have the potential to degrade the quality of the environment or affect important examples of prehistory. Therefore, further evaluation of this topic will be provided in the EIR.

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 impacts of the Project are combined with impacts from related development projects and result in impacts that are greater than the impacts of the Project alone. Located within the vicinity of the Project Site are other current and reasonably foreseeable projects, the development of which, in conjunction with that of the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be analyzed in the EIR for the following subject areas: air quality; cultural resources; greenhouse gas emissions; hazards and hazardous materials; hydrology/water quality/groundwater; land use and planning; noise; fire protection; police protection; transportation/traffic; tribal cultural resources; and water supply.

With regard to cumulative effects with respect to agriculture and forest resources, biological resources, geology and soils, mineral resources, population and housing, schools, parks and recreation, libraries, wastewater, and solid waste, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable, as discussed in the following analysis.

With regard to agriculture and forest resources, biological resources, and mineral resources, no such resources are located on the Project Site. In addition, due to the developed nature of the Project Site and surrounding area, no sensitive species or natural communities are present within the Project Site. Thus, the Project would have no impact to agriculture, biological, and mineral resources, and therefore could not combine with other projects to result in cumulative impacts.

With regard to geology and soils, due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. 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. Cumulative development would expose a greater number of people to seismic hazards. However, as with the Project, related projects would be subject to local, state, and federal regulations and standards for seismic safety. Thus, Project impacts related to geology and soils would not be cumulatively considerable and would be less than significant.

With regard to population and housing, schools, parks and recreation, libraries, wastewater, and solid waste, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. Specifically, as discussed in the analysis above, the Project does not propose the development of residential uses and thus would not directly contribute to population growth within the Project Site area. In addition, the Project would not result in a notable indirect increase in demand for new housing, and any new indirect demand, should it occur, would be minor in the context of forecasted growth for the City of Los Angeles or the Central City North Community Plan area. Further, the Project would not generate a direct residential population that could increase the demand for schools, parks and recreational facilities, and libraries and any indirect increase in the local residential population would be inconsequential. Additionally, the Project would generate a net of approximately 64,888 gallons of wastewater per day, or approximately 0.065 mgd, upon completion. The Project's average daily wastewater flow of 0.065 million gallons per day would represent approximately 0.04 percent of the current 175 million gallons per day available capacity of the HTP. Therefore, Project-generated wastewater would be accommodated by the existing capacity of the HTP. In addition, the City would continue to monitor wastewater flows and update infrastructure, as necessary, to accommodate the growth within the City. New development projects

occurring in the Project vicinity, including the related projects, would also be required to coordinate with the City of Los Angeles via a sewer capacity availability request to determine adequate sewer capacity. Also, new development projects would be subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. Lastly, the estimated net increase in solid waste generated by the Project would represent approximately 0.03 percent of the City's annual solid waste disposal, and approximately 0.0009 percent of the remaining disposal capacity for the County's Class III landfills open to the City. Also, based on the 2016 CoIWMP Annual Report, the County anticipates that future solid waste disposal needs can be adequately met through 2031. Thus, cumulative impacts for these subject areas would be less than significant, and no further evaluation in an 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. Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: air quality; cultural resources; greenhouse gas emissions; hazards and hazardous materials; hydrology/water quality/groundwater; land use and planning; noise; fire protection; police protection; transportation/traffic; tribal cultural resources; and water supply. As a result, these potential effects will be analyzed further in an EIR for the Project.

Appendices

Appendix IS-1

Shading Diagrams

HyperLoop - Solar Shade Diagrams

13 July 2018

SHIMODA DESIGN GROUP

ARCHITECTURE + INTERIORS

TISHMAN SPEYER

Equinox

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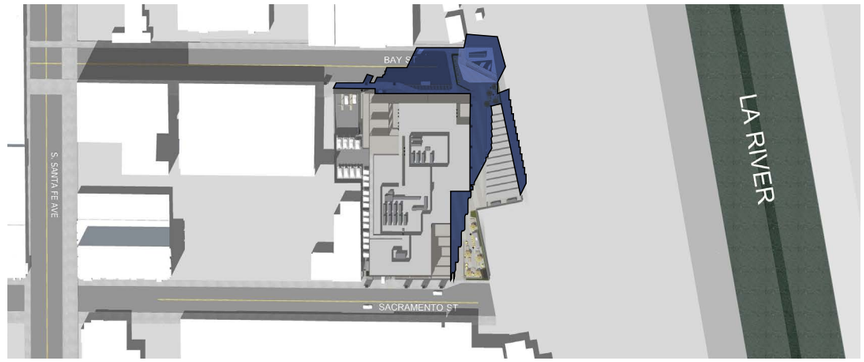

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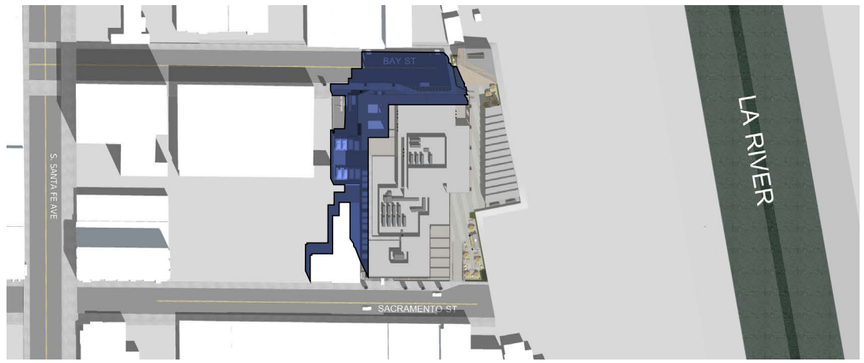

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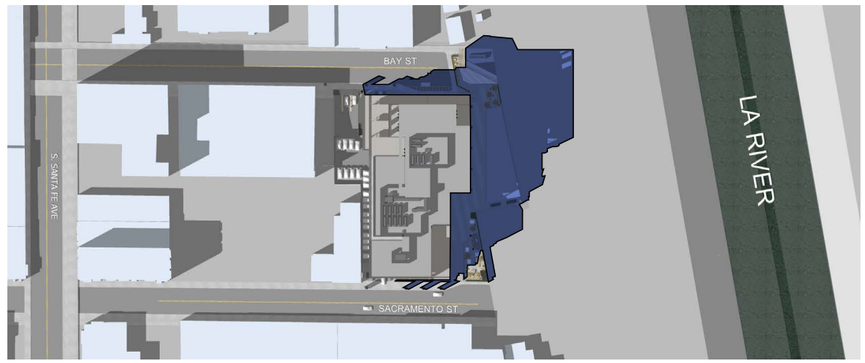

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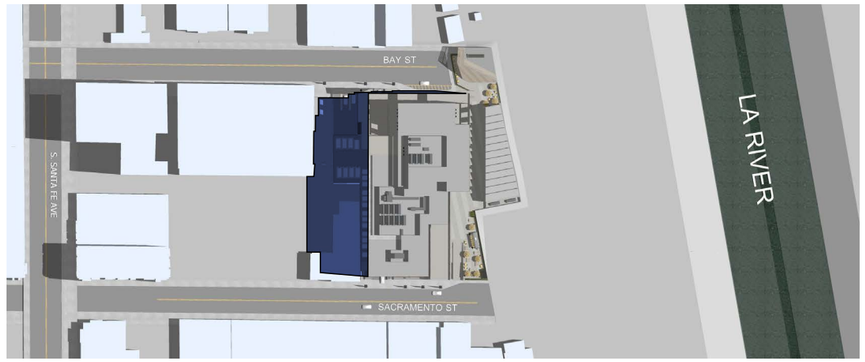
Summer



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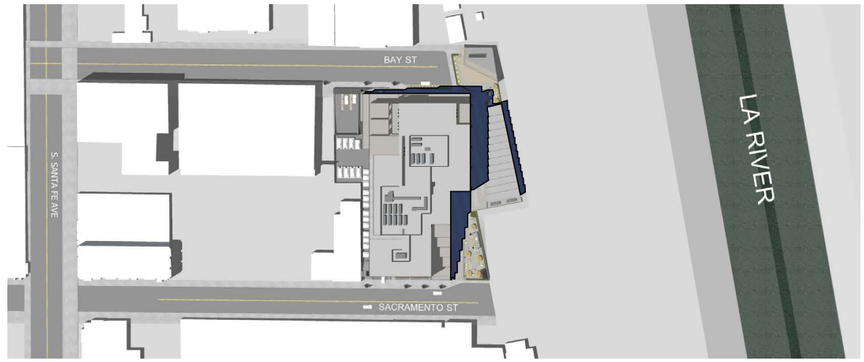

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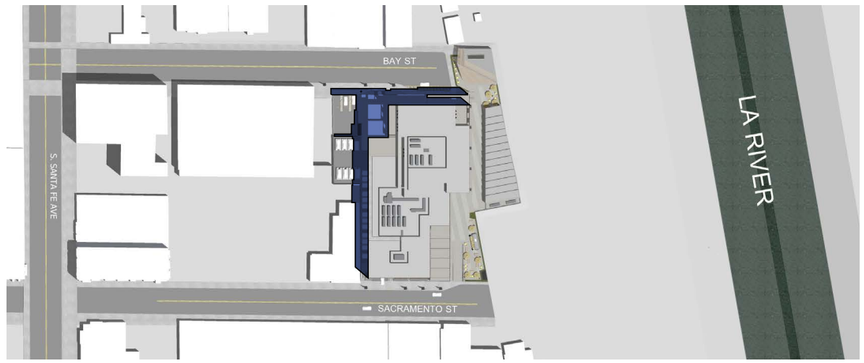

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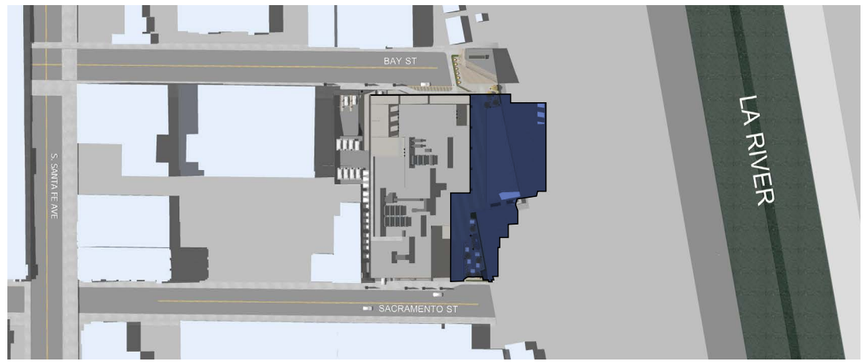

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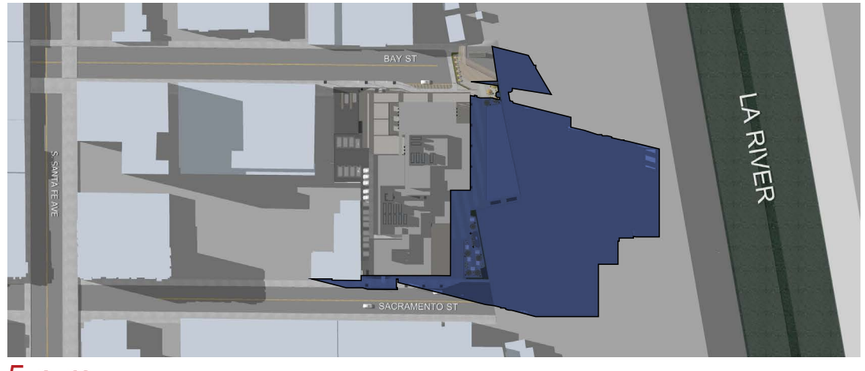

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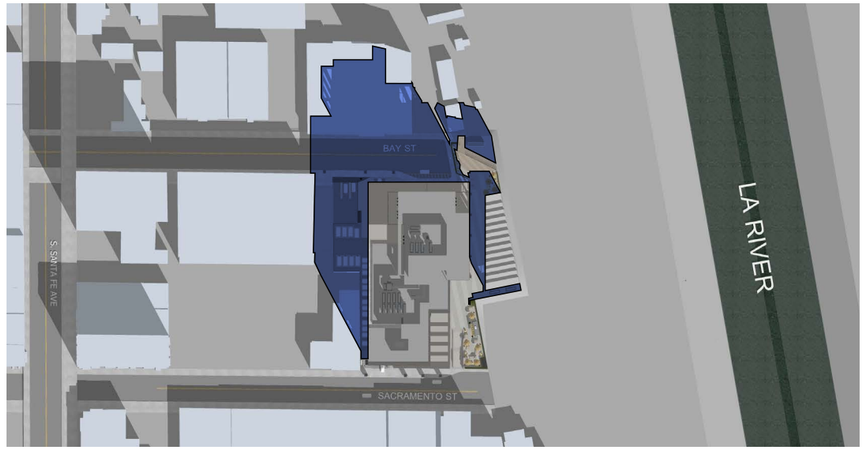

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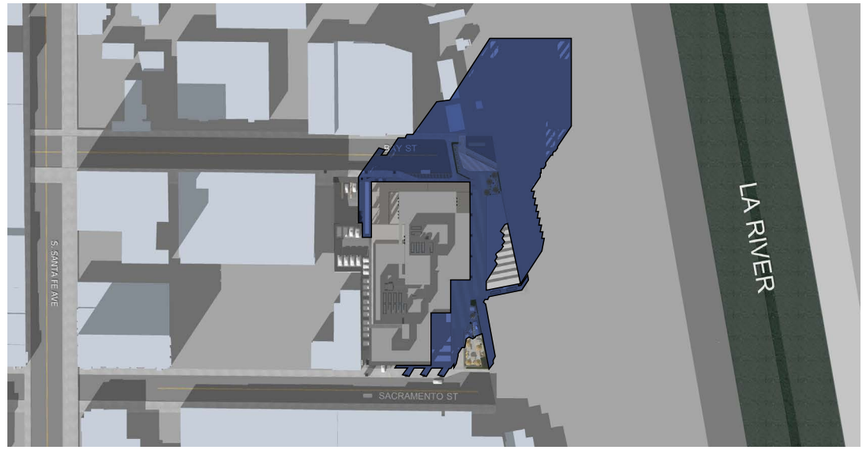

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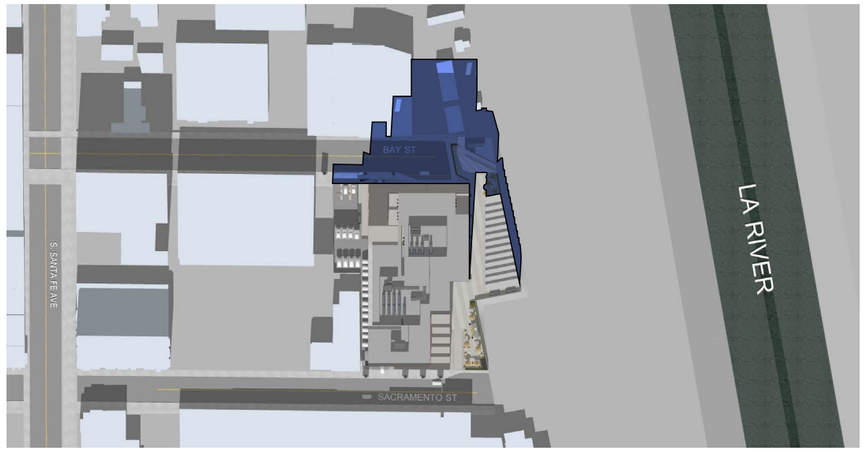

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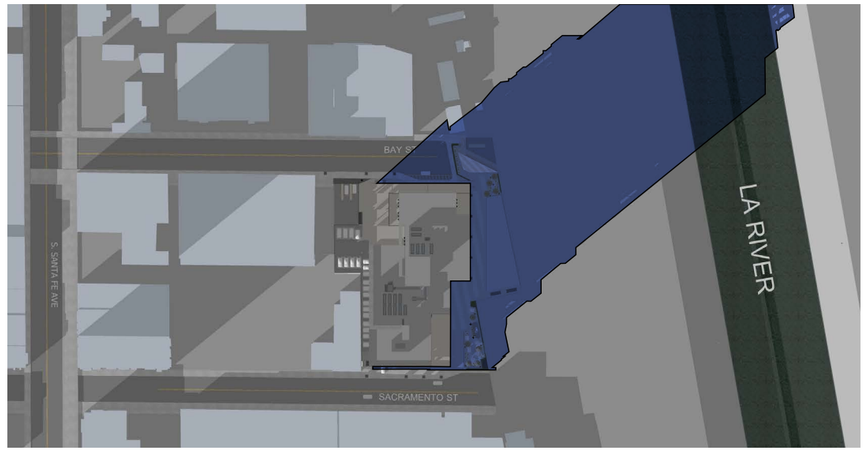


4 p.m.

Appendix IS-2

Tree Report

Tree Report

Date: January 24, 2017
Prepared for: Tishman Speyer
Project: 2159 Bay Street
Property: 2159 Bay Street, Los Angeles, CA
Prepared by: Shimoda Design Group
Ying-Ling Sun Esfandi
Registered California Landscape Architect #5470

This tree report was prepared at the request of Tishman Speyer, in preparation for the proposed 2159 Bay Street project.

This property is under the jurisdiction of the City of Los Angeles and guided by the Native Tree Protection Ordinance No. 177404. Per the ordinance, the following tree species are protected: Oak trees including indigenous Oaks, Southern California Black Walnut, Western Sycamore and California Bay Tree. Any trees of the above species that are larger than 4" caliper at 4.5 feet above the ground level are to be considered protected for the purpose of this ordinance. Trees that are to be retained on the site need to be protected during any grading process to within 5' of the drip line of the tree to preclude potential damage to the tree. Non protected trees of 8" caliper or larger need to be noted too.

The protected trees may be relocated or removed upon prior approval of removal if a) its presence prevents the reasonable development of the property, b) the health of the tree is in decline and its restoration is not advisable or feasible c) It is in danger of falling d) It interferes with proposed utility or roadways within or without property e) It has no apparent aesthetic value that will contribute to the appearance and design of a proposed subdivision.

I have reviewed the subject property and the surrounding properties to determine if any protected trees are present. I observed only shrubs and no trees on site or in the public right of way at and in the vicinity of the property.

Summary: There are NO trees on this property that would be considered protected within the City of Los Angeles Native Tree Protection Ordinance. There are NO trees to be retained or protected in place.

Ying-Ling Sun Esfandi
California Registered Landscape Architect #5470

EXTRA SUPERFINO
837 Traction Avenue Suite 101 Los Angeles, CA 90013
T 213 596 1771
F 2135961772

Appendix IS-3

Geotechnical Assessment

Geotechnologies, Inc.
Consulting Geotechnical Engineers

439 Western Avenue
Glendale, California 91201-2837
818.240.9600 • Fax 818.240.9675

November 21, 2017
File No. 21521

Tishman Speyer
400 South Hope Street, Suite 200
Los Angeles, California 90071

Attention: David Lapidus

Subject: Preliminary Geotechnical Assessment
Proposed Commercial Development
2159 Bay Street, Los Angeles, California

Dear Mr. Lapidus:

1.0 INTRODUCTION

This document presents the results of the preliminary geotechnical assessment of the subject property. This preliminary report is intended to evaluate the subsurface conditions anticipated at the site, the potential seismic hazards that could affect the site, and provide an opinion regarding the feasibility of the proposed project from a geotechnical perspective. This preliminary report is based on site observations by a representative of this firm, review of available project files, and review of published geotechnical and geological information.

This report is general in nature and does not present geotechnical design criteria sufficient for use in designing any proposed structure. Similarly, due to the general nature of this assessment, this report is not intended to be submitted for review by the building official for permitting purposes. A comprehensive geotechnical investigation including subsurface exploration and laboratory testing should be prepared for design input, when necessary.

2.0 PROJECT DESCRIPTION

At this time, the proposed project is in the early phases of conception and design. It is assumed that an 8-story structure will be constructed over two levels of subterranean parking. It is proposed that a double-stack mechanical parking system will be implemented within the parking levels. Grading is expected to consist of excavations on the order of 26 to 34 feet for the construction of the proposed subterranean levels and foundation elements. The site location is shown on the enclosed Vicinity Map and the proposed development is shown on the enclosed Site Plan and Cross-Section A-A'.

3.0 SITE CONDITIONS

The subject site is located southeast of the downtown area of the City of Los Angeles between Bay Street and Sacramento Street. It is bounded to the north by Bay Street, to the east by a

paved parking lot followed by train tracks, to the south by Sacramento Street, and to the west by 2-story commercial structures. The site is shown relative to nearby topographic features in the enclosed Vicinity Map and Site Plan.

The surrounding area and subject site descend very gently to the southeast. Total topographic relief across the site is on the order of two feet. The site is currently developed with two to three story commercial structures. It is anticipated that the existing structures will be demolished prior to construction of the proposed development. Vegetation is non-existent due to the developed nature of the site.

4.0 PROJECTS IN THE VICINITY OF THE SITE BY GEOTECHNOLOGIES, INC.

This firm has provided geotechnical services on many projects throughout the City of Los Angeles. Some of those projects are in close proximity to the subject site. A brief summary of a few of these projects is provided below. The locations of these projects are indicated on the enclosed Vicinity Map.

- *Geotechnical Engineering Investigation, Proposed Mixed-Use Structure, 2110 Bay Street, Los Angeles, California, report dated November 24, 2015, File No. 21076.*

  The geotechnical investigation for the project included two excavations to depths of between 50 and 80 feet. The borings encountered local fill overlying natural alluvial soils. Groundwater was not encountered to depths of 80 feet below the ground surface. Analyses presented in the report indicate the site soils would not be subject to liquefaction during a design-level earthquake.

- *Geotechnical Engineering Investigation, Proposed Adaptive Reuse of Existing Building, 1000 South Santa Fe Avenue, Los Angeles, California, dated May 12 2015, File No. 20945.*

  Geotechnical exploration for the proposed project consisted of six excavations to depths between 5 and 50 feet. Groundwater was not encountered during exploration to a maximum depth of 50 feet below the ground surface. The report concluded that the site soils would not be susceptible to liquefaction.

- *Geotechnical Engineering Investigation, Proposed Parking Lot, 2130 Violet Street, Los Angeles, California, dated July 27, 2017, File No. 21474.*

  Exploration for site included four excavations to depths between 40 and 70 feet. Groundwater was not encountered to a maximum explored depth of 70 feet. The report indicates the potential for liquefaction at the site was remote.

5.0 ANTICIPATED SUBSURFACE CONDITIONS

5.1 Geologic Materials

Based on the previous investigations in the vicinity of the site, review of published geologic maps, and the experience of this firm in this area of the City of Los Angeles, it is anticipated the soils underlying the subject site consist of native alluvial soils. These alluvial soils generally consist of mixtures of sand, silt, and clay, with varying amounts of gravels. The alluvium is typically dense or stiff and well consolidated, with expansion characters that range from very low to low.

It is anticipated that some amount of existing fill soils will overlie the alluvium in and around the subject site. Site specific exploration would be required to verify the presence and/or thickness of any existing fill soils.

5.2 Groundwater

Previous investigations in the vicinity of the site did not encounter groundwater to explored depths of approximately 80 feet. A recent environmental site assessment conducted in August, 2016, observed groundwater at 81 feet below ground surface. It is the opinion of this firm that the current groundwater levels at the site are anticipated to be similar to the water levels observed at nearby investigations and recent site investigations conducted by this firm and other firms.

According to groundwater data provided in the Seismic Hazard Zone Report of the Los Angeles 7½-Minute Quadrangle, the historic-high groundwater level for the site is on the order of 170 feet below ground surface. A copy of the historic high water map is enclosed herein.

Fluctuations in the level of groundwater would be expected to occur over time due to variations in rainfall, temperature, and other factors. Moderate fluctuations may also occur within the vicinity of the site.

6.0 REGIONAL GEOLOGY AND FAULTING

6.1 Regional Geology

The subject site is located within the northern portions of the Los Angeles Basin and Peninsular Ranges Geomorphic Province. The Peninsular Ranges are characterized by northwest-trending blocks of mountain ridges and sediment-floored valleys. The dominant geologic structural features are northwest trending fault zones that either die out to the northwest or terminate at east-west trending reverse faults that form the southern margin of the Transverse Ranges.

The Los Angeles Basin is located at the northern end of the Peninsular Ranges Geomorphic Province. The basin is bounded by the east and southeast by the Santa Ana Mountains and San Joaquin Hills, and to the northwest by the Santa Monica Mountains. Over 22 million years ago, the Los Angeles Basin was a deep marine basin formed by tectonic forces between the North American and Pacific plates. Since that time, over 5 miles of marine and non-marine sedimentary rock, as well as intrusive and extrusive igneous rocks, have filled the basin. During the last 2 million years, defined by the Pleistocene and Holocene epochs, the Los Angeles Basin and surrounding mountain ranges have been uplifted to form the present day landscape. Erosion of the surrounding mountains has resulted in deposition of unconsolidated sediments in low-lying areas by rivers such as the Los Angeles River. Areas that have experienced subtle uplift have been eroded with gullies (Yerkes, 1965).

6.2 Regional Faulting

The enclosed Southern California Fault Map shows the location of many mapped faults in the Southern California area. Buried thrust faults are faults without a surface expression but are a significant source of seismic activity. They are typically broadly defined based on the analysis of seismic wave recordings of hundreds of small and large earthquakes in the Southern California area. Due to the buried nature of these thrust faults, their existence is usually not known until they produce an earthquake. The risk for surface rupture potential of these buried thrust faults is inferred to be low (Leighton, 1990). However, the seismic risk of these buried structures in terms of recurrence and maximum potential magnitude is not well established.

The names and distances from the subject site of local and regional faults are provided on the enclosed table titled Seismic Source Summary Table. The locations of the faults are also shown on the enclosed Southern California Fault Map. The fault distances were determined using the United States Geological Survey (USGS) Source Parameters Fault Database, 2008.

Two major buried thrust fault structures in the Los Angeles area are the Elysian Park fold and thrust belt and the Torrance-Wilmington fold and thrust belt. It is postulated that the Elysian Park structure was responsible for the magnitude 5.9, October 1, 1987 Whittier Narrows earthquake, and that the Torrance-Wilmington structure was responsible for the magnitude 5.0, January 19, 1989 Malibu earthquake. The magnitude 6.7, January 17, 1994 Northridge earthquake was caused by a buried thrust fault located beneath the San Fernando Valley.

7.0 LOCAL GEOLOGY

The subject site is located on an alluvial plain to the southeast of the Hollywood Hills. Review of the geologic map by (Dibblee, 1991), indicates the subject site is located in an area underlain by alluvial sediments. This is consistent with the earth materials encountered on projects in the vicinity of the subject site. A copy of the geologic map by (Dibblee, 1991) is enclosed herein.

8.0 SEISMIC AND GEOLOGIC HAZARDS

8.1 Surface Rupture

Review of the earthquake fault zones map within Los Angeles indicates that the subject site is not located within an Alquist-Priolo Earthquake Fault Zone (http://navigatela.lacity.org). The closest Alquist-Priolo Earthquake Fault Zone is the Hollywood Fault / Raymond Fault Zone, which is located approximately 5.7 miles to the north of the subject site. A copy of this map is enclosed herein entitled Earthquake Fault Zone Map.

Ground rupture is defined as surface displacement which occurs along the surface trace of the causative fault during an earthquake. Based on research of available literature, no known active or potentially active faults underlie the subject site. In addition, the subject site is not located within an Alquist-Priolo Earthquake Fault Zone. Based on these considerations, the potential for surface ground rupture at the subject site is considered low.

8.2 Nearby Faults

According to the Website NavigateLA, developed by the City of Los Angeles, Bureau of Engineering, Department of Public Works, an east-west trending fault is located approximately 1.2 miles to the northeast of the proposed development. A copy of this map is attached as the Local Quaternary Fault Map. The fault source is listed as the California Geological Survey (CGS) digital database of Fault Activity Map of California. However, after reviewing the CGS website, the Fault Activity Map does not show this unnamed fault.

Geologic maps by Lamar (1970), Dibblee (1989), Yerkes, et al, (1977), and the Department of Water Resources (1961) do not show this fault. The fault does not have a designated Fault rupture Hazard Zone (Bryant, W.A. and Hart, E.W. 2007). The origin of this fault is unknown to this firm.

Based on the research by this firm, the presence of the fault as shown on the NavigateLA Website could not be corroborated or verified with other references. Additionally, surface manifestation of fault activity in that region could not be ascertained by the geologist representing the Los Angeles, Department of Building and Safety. Therefore, in the opinion of this firm, the designated fault need not be considered in the design of the proposed structures.

8.3 Liquefaction

The Seismic Hazards Map of the Los Angeles Quadrangle by the State of California (CDMG, 1999) does not classify the site as part of a liquefiable area. This determination is based on groundwater depth records, soil type and distance to a fault capable of producing a substantial earthquake. A copy of this Seismic Hazard Zones Map is enclosed herein.

Groundwater was not encountered in the vicinity of the site to an explored depth of 80 feet, and the closest historic high water level is reported to have been on the order of 170 feet below the ground surface (CDMG, 1998, Revised 2006). A recent environmental investigation conducted in 2016, however, observed groundwater at 81 feet below ground surface. Based on other liquefaction analyses in the vicinity of the site, the alluvial soils underlying the subject site are typically not considered to be subject to liquefaction. Based on these considerations, it is probable that the potential for liquefaction at the subject site will likely be low. Nonetheless, a site specific liquefaction analysis should be performed as part of a comprehensive, design-level geotechnical investigation.

8.4 Dynamic Dry Settlement

Seismically-induced settlement or compaction of dry or moist, cohesionless soils can be an effect related to earthquake ground motion. Such settlements are typically most damaging when the settlements are differential in nature across the length of structures.

Some seismically-induced dry settlement of the proposed structures could be expected at the subject site as a result of strong ground-shaking. However, based on the typically dense, stiff, and consolidated nature of the alluvial soils expected to underlie the site, the potential dynamic settlements would be expected to be negligible.

8.5 Tsunamis, Seiches, and Flooding

Tsunamis are large ocean waves generated by sudden water displacement caused by a submarine earthquake, landslide, or volcanic eruption. Review of the County of Los Angeles Flood and Inundation Hazards Map (Leighton, 1990) indicates the site does not lie within mapped tsunami inundation boundaries.

Seiches are oscillations generated in enclosed bodies of water which can be caused by ground shaking associated with an earthquake. Review of the County of Los Angeles Flood and Inundation Hazards Map, (Leighton, 1990), indicates the site lies within the mapped inundation boundary of an up-gradient reservoir.

8.6 Landsliding

The probability of seismically-induced landslides affecting the subject development is considered to be remote, due to the lack of significant slopes on the site and surrounding areas.

8.7 Methane Zone

This office has reviewed the City of Los Angeles Methane and Methane Buffer Zones map. Based on this review it appears that the subject property is not located within a Methane Zone or Methane Buffer Zone as designated by the City. A copy of the portion of the map covering the project site is included herein.

9.0 PRELIMINARY CONCLUSIONS

Based on the research of other projects in the site vicinity, and this firm's experience in this area of the City of Los Angeles, it is the opinion of this firm that the proposed development is feasible from a geotechnical engineering standpoint. Once the proposed project proceeds to a more refined design, it is recommended that a comprehensive geotechnical investigation should be prepared in order to provide design parameters and recommendations for the proposed project.

At this time, it is feasible for the development to be supported on conventional spread footings. For shallow foundations and slabs, some remedial grading, including removal and recompaction of existing fill soils, should be expected. Depending on the height of the proposed development, and the anticipated structural loading conditions, it may be necessary to utilize alternative foundation designs if heavy structural loads are anticipated. This may or may not include the use of mat or pile foundations.

The proposed development is expected to be underlain by two basement levels and founded at depths on the order of 26 to 34 feet below the ground surface. Therefore, groundwater is not expected to affect the proposed development, nor would the proposed development be expected to affect the groundwater conditions underlying the site.

Due to the depth of the proposed basement levels, and the proximity of the property lines and existing offsite structures, it should be anticipated that shoring will be required for construction of the basement levels.

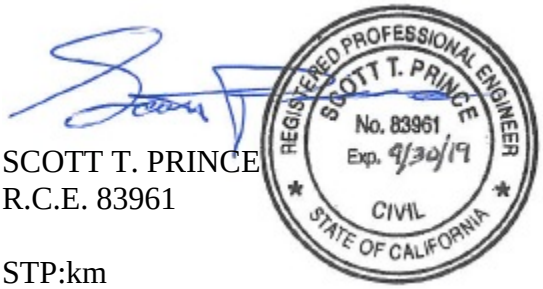
As with all of Southern California, the site is subject to potential strong ground motion should a moderate to strong earthquake occur on a local or regional fault. The proposed project should be completed in accordance with the provisions of the most current applicable building code and requirements of the local building official. Design of the project in accordance with the current building code provisions will be intended to mitigate the potential effects of strong ground shaking.

10.0 CLOSURE

This report is general in nature and does not present geotechnical design criteria sufficient for use in designing any proposed structure. Similarly, due to the general nature of this assessment, this report is not intended to be submitted for review by the building official. A comprehensive geotechnical investigation including subsurface exploration and laboratory testing should be prepared for design input, when necessary.

Geotechnologies, Inc. appreciates the opportunity to provide our services on this project. Should you have any questions, please contact this office.

Respectfully Submitted,
GEOTECHNOLOGIES, INC.



SCOTT T. PRINCE
R.C.E. 83961

STP:km

Distribution (3) Addressee

Email to: [dlapidus@tishmanspeyer.com], Attn: David Lapidus

Enclosures: References
Vicinity Map
Site Plan
Cross Section A-A'
Local Geologic Map
Historically Highest Groundwater Levels Map
Southern California Fault Map
Seismic Source Summary Table
Earthquake Fault Zone Map
Local Quaternary Fault Map
Methane Zone Map
Seismic Hazard Zone Map

REFERENCES

California Department of Conservation, Division of Mines and Geology, 1998, Seismic Hazard Zone Report of the Los Angeles 7½-Minute Quadrangle, Los Angeles County, California, C.D.M.G. Seismic Hazard Zone Report 026, Map scale 1:24,000.

California Department of Conservation, Division of Mines and Geology, 1999, Seismic Hazard Zones Map, Los Angeles 7½-minute Quadrangle.

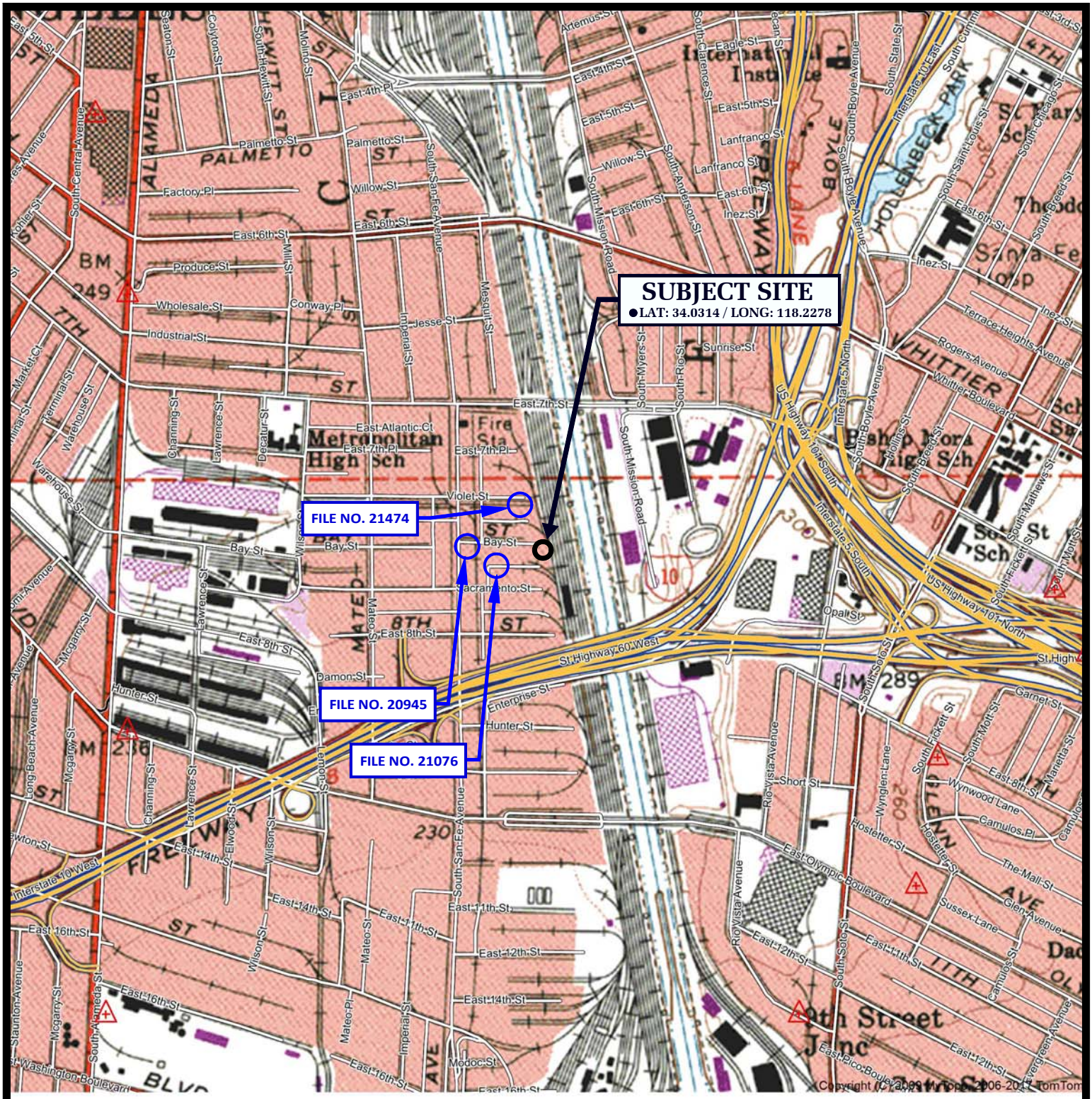
City of Los Angeles Bureau of Engineering Department of Public Works, 2017, website: http://navigatela.lacity.org/navigatela/

Dibblee, T.W., 1989, Geologic Map of the Los Angeles (South ½) 7.5-Minute Quadrangles, Map No DF-22, map scale 1: 24,000.

Hart, E.W. and Bryant, W.A., 1999 (updated 2005), Fault Rupture Zones in California, Division of Mines and Geology, Special Publication 42, 25pp.

Leighton and Associates, Inc. (1990), Technical Appendix to the Safety Element of the Los Angeles County General Plan: Hazard Reduction in Los Angeles County.

Yerkes, R.F., Geology of the Los Angeles Basin, California: An Introduction, U.S. Geologic Survey Prof. Pap., 0420-A, A1-A57, 1965.



SCALE 1:12000

0.0 0.1 0.2 0.3 0.4 0.5 0.6
MILES
0 1000 2000 3000
FFET

REFERENCE: U.S.G.S. TOPOGRAPHIC MAPS, 7.5 MINUTE SERIES, LOS ANGELES, CA QUADRANGLE

VICINITY MAP

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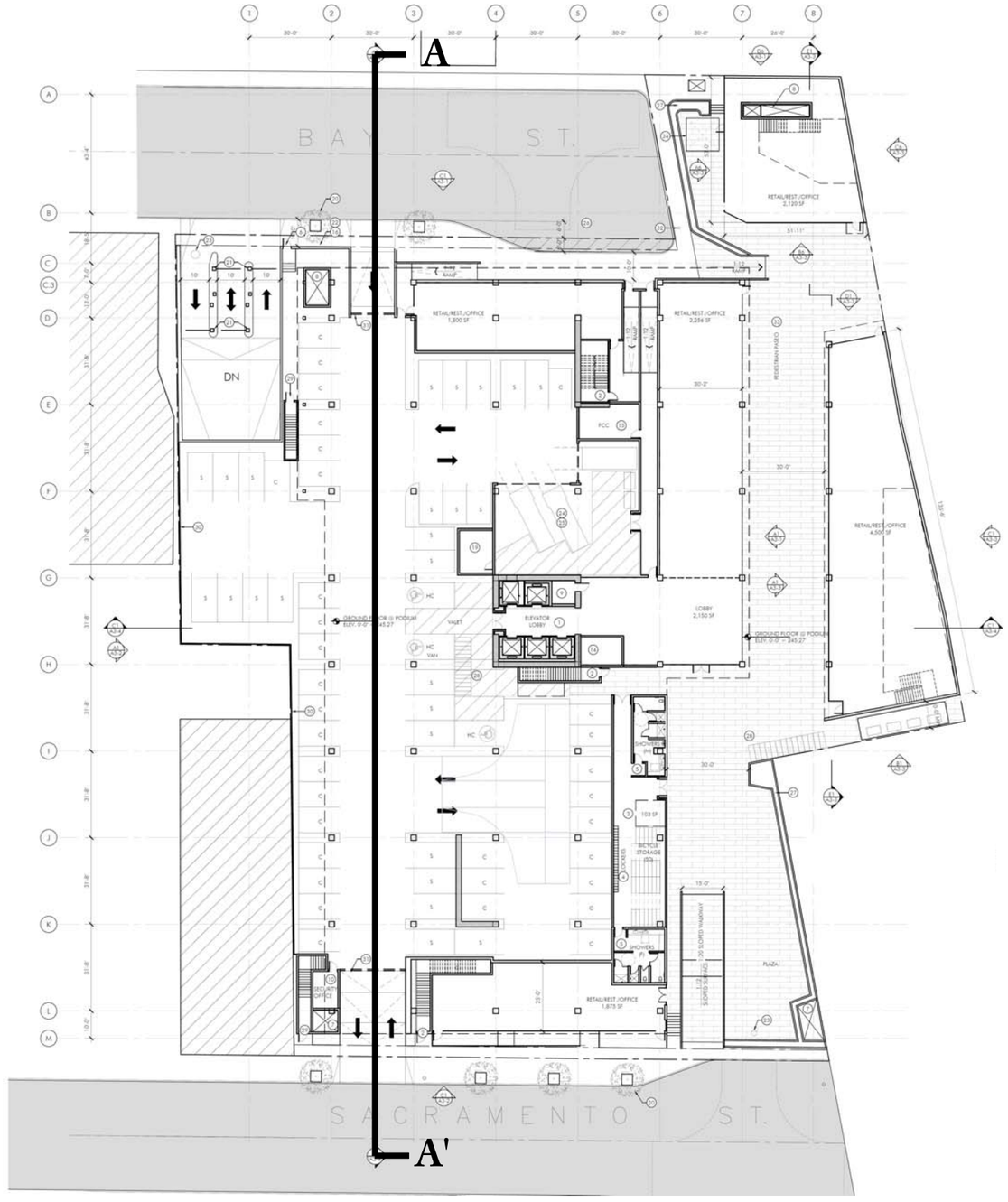
Consulting Geotechnical Engineers

TISHMAN SPEYER
2159 BAY ST., LOS ANGELES

FILE NO. 21521



N NE E SE S SW W NW

SCALE IN FEET

0 30 50 100

LEGEND

A — A' **CROSS-SECTION LOCATION**

REFERENCES: GROUND FLOOR PARKING SUMMARY PROVIDED BY SHIMODA DESIGN GROUP DATED FEBRUARY 15, 2017

SITE PLAN

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TISHMAN SPEYER
2159 BAY ST., LOS ANGELES

FILE No. 21521 | **DRAWN BY: TC**

DATE: October 2017

N

SCALE IN FEET

0 30 50 100

REFERENCE: GROUND FLOOR PARKING SUMMARY PROVIDED BY SHIMODA DESIGN GROUP
DATED FEBRUARY 15, 2017

CROSS-SECTION A-A'

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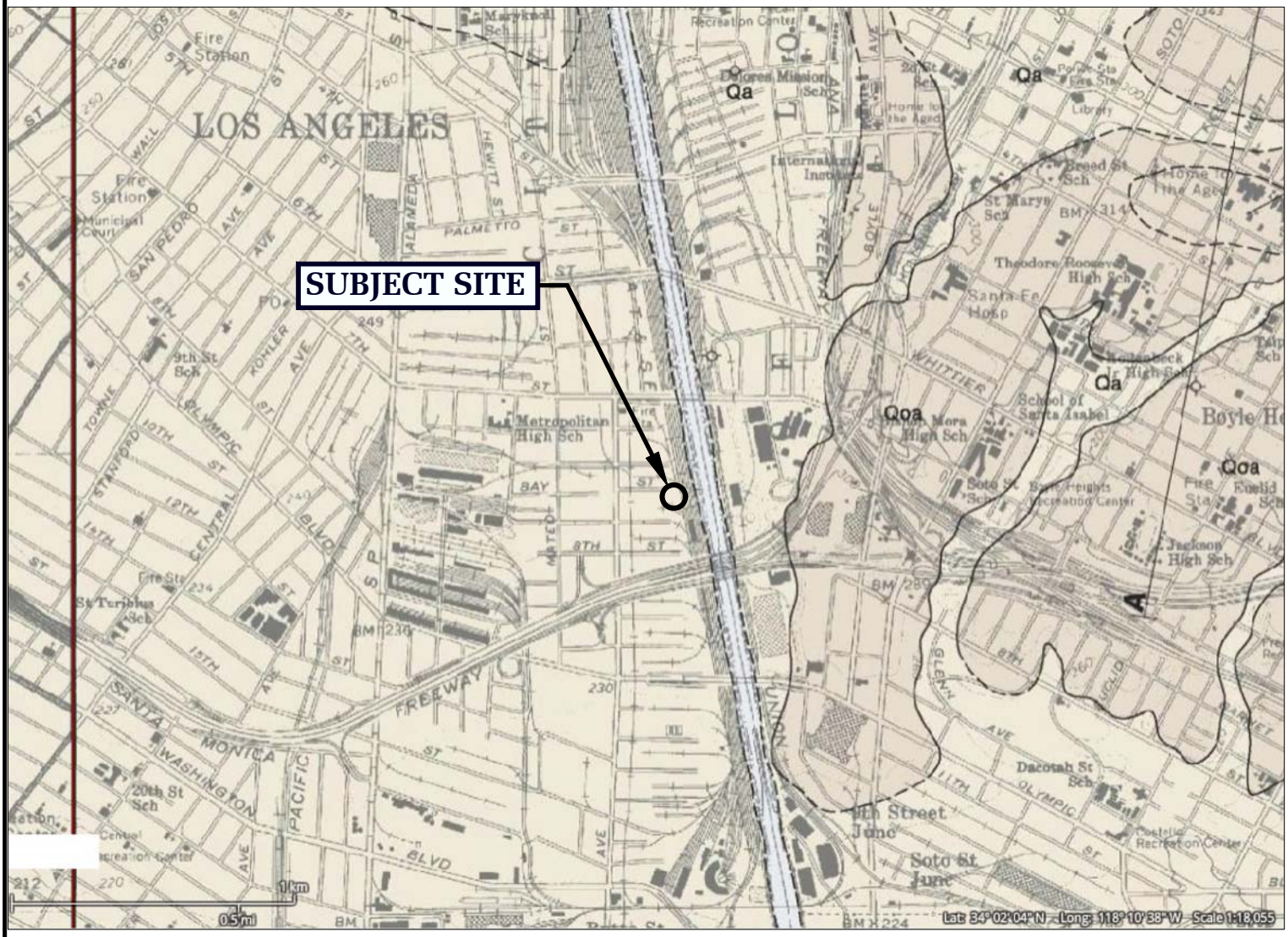
DATE: October 2017	



LEGEND

Qg: Surficial Sediments - alluvial clay and sand of valley areas
Qa: Surficial Sediments - alluvium: unconsolidated floodplain deposits of silt, sand and gravel
Qoa: Older Surficial Sediments - remnants of older weakly consolidated alluvial deposits of gravel, sand and silt

Folds - arrow on axial trace of fold indicates direction of plunge
Fault - dashed where indefinite or inferred, dotted where concealed, queried where existence is doubtful

REFERENCE: DIBBLEE, T.W., (1989) GEOLOGIC MAP OF THE LOS ANGELES QUADRANGLE (#DF-22)

LOCAL GEOLOGIC MAP - DIBBLEE

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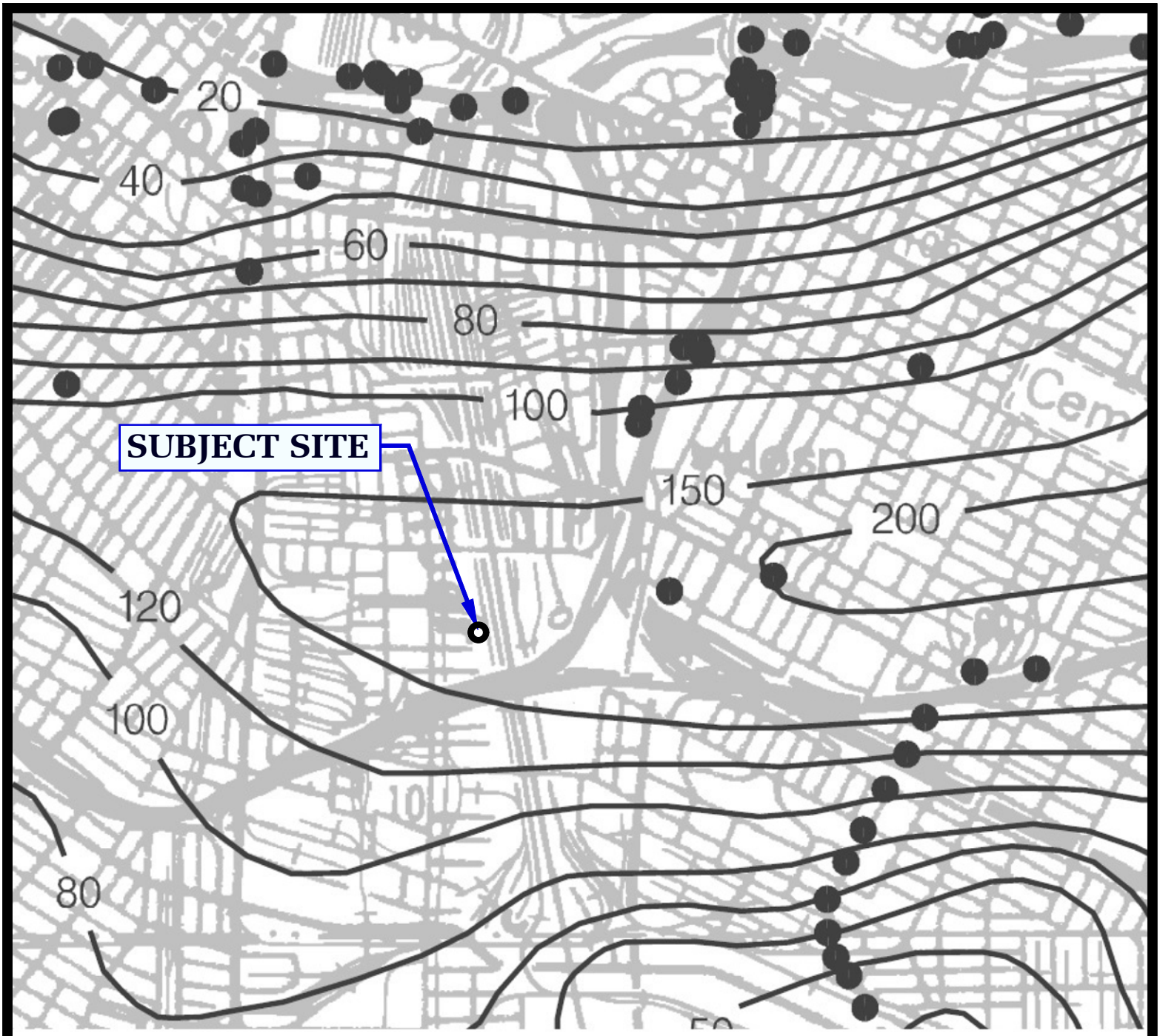

ONE MILE

SCALE

N

20 Depth to groundwater in feet

REFERENCE: CDMG, SEISMIC HAZARD ZONE REPORT, 029
LOS ANGELES 7.5 - MINUTE QUADRANGLE, LOS ANGELES COUNTY, CALIFORNIA (1998, REVISED 2006)

HISTORICALLY HIGHEST GROUNDWATER LEVELS

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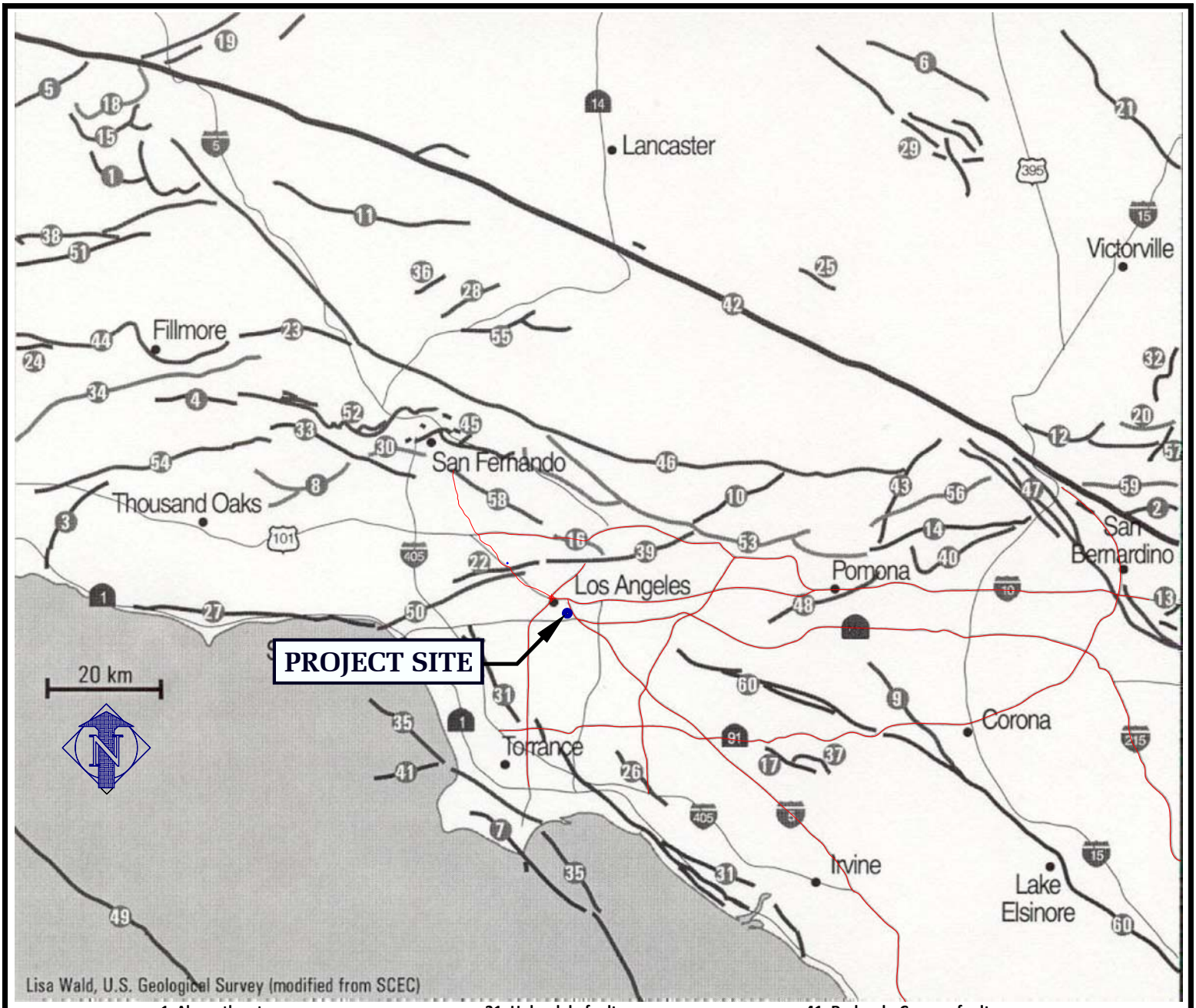

1 Alamo thrust
2 Arrowhead fault
3 Bailey fault
4 Big Mountain fault
5 Big Pine fault
6 Blake Ranch fault
7 Cabrillo fault
8 Chatsworth fault
9 Chino fault
10 Clamshell-Sawpit fault
11 Clearwater fault
12 Cleghorn fault
13 Crafton Hills fault zone
14 Cucamonga fault zone
15 Dry Creek fault
16 Eagle Rock fault
17 El Modeno fault
18 Frazier Mountain thrust
19 Garlock fault zone
20 Grass Valley fault
21 Helendale fault
22 Hollywood fault
23 Holser fault
24 Lion Canyon fault
25 Llano fault
26 Los Alamitos fault
27 Malibu Coast fault
28 Mint Canyon fault
29 Mirage Valley fault zone
30 Mission Hills fault
31 Newport Inglewood fault zone
32 North Frontal fault zone
33 Northridge Hills fault
34 Oak Ridge fault
35 Palos Verdes fault zone
36 Pelona fault
37 Peralta Hills fault
38 Pine Mountain fault
39 Raymond fault
40 Red Hill (Etiwanda Ave) fault
41 Redondo Canyon fault
42 San Andreas Fault
43 San Antonio fault
44 San Cayetano fault
45 San Fernando fault zone
46 San Gabriel fault zone
47 San Jacinto fault
48 San Jose fault
49 Santa Cruz-Santa Catalina Ridge f.z.
50 Santa Monica fault
51 Santa Ynez fault
52 Santa Susana fault zone
53 Sierra Madre fault zone
54 Simi fault
55 Soledad Canyon fault
56 Stoddard Canyon fault
57 Tunnel Ridge fault
58 Verdugo fault
59 Waterman Canyon fault
60 Whittier fault

REFERENCE: http://pasadena.wr.usgs.gov/info/images/LA%20Faults.pdf

SOUTHERN CALIFORNIA FAULT MAP

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TISHMAN SPEYER
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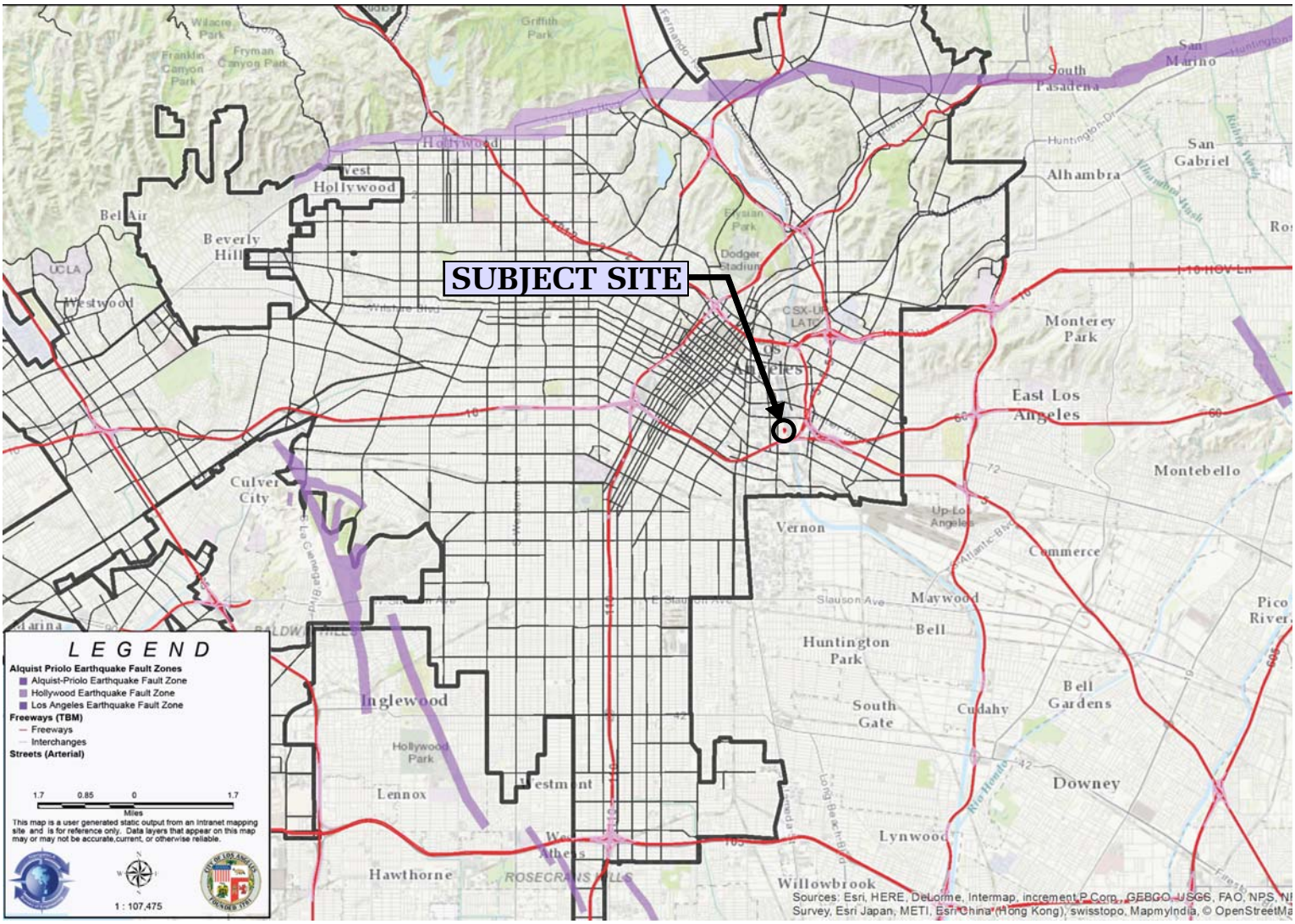
FILE NO. 21521

Seismic Source Summary Table

Tishman Speyer Properties
File No. 21521

Fault Name	Distance in Miles	Pref Slip Rate (mm/yr)	Dip (degrees)	Dip Dir	Slip Sense	Rupture Top(km)	Rupture Bottom (km)	Length (km)
Elysian Park (Upper)	2.45	1.3	50	NE	reverse	3	15	20
Puente Hills (LA)	3.37	0.7	27	N	thrust	2.1	15	22
Hollywood	6.04	1	70	N	strike slip	0	17	17
Raymond	6.23	1.5	79	N	strike slip	0	16	22
Santa Monica Connected	6.29	2.4	44		strike slip	0.8	11	93
Newport Inglewood Connected	7.75	1.3	90	V	strike slip	0	11	208
Verdugo	8.07	0.5	55	NE	reverse	0	15	29
Puente Hills (Santa Fe Springs)	9.96	0.7	29	N	thrust	2.8	15	11
Elsinore	10.57	n/a	84	NE	strike slip	0	16	241
Santa Monica	10.92	1	75	N	strike slip	0	18	14
Sierra Madre	12.54	2	53	N	reverse	0	14	57
Puente Hills (Coyote Hills)	14.21	0.7	26	N	thrust	2.8	15	17
Clamshell-Sawpit	16.5	0.5	50	NW	reverse	0	14	16
Palos Verdes	16.79	3	90	V	strike slip	0	14	99
Malibu Coast	17.11	0.3	75	N	strike slip	0	8	38
Sierra Madre (San Fernando)	17.46	2	45	N	thrust	0	13	18
Anacapa-Dume	18.67	3	41	N	thrust	1.2	12	65
San Gabriel	19.98	1	61	N	strike slip	0	15	71
San Jose	19.98	0.5	74	NW	strike slip	0	15	20
Northridge	21.04	1.5	35	S	thrust	7.4	17	33
Santa Susana	25.37	5	55	N	reverse	0	16	27
Anacapa-Dume	27.07	3	45	N	thrust	0	16	51
Chino	27.63	1	65	SW	strike slip	0	14	29
San Joaquin Hills	28.68	0.5	23	SW	thrust	2	13	27
Cucamonga	29.29	5	45	N	thrust	0	8	28
Holser	32.34	0.4	58	S	reverse	0	19	20
Simi-Santa Rosa	32.79	1	60		strike slip	1	12	39
S. San Andreas	35.02	n/a	86		strike slip	0	14	442
Newport-Inglewood (Offshore)	35.27	1.5	90	V	strike slip	0	10	66
Oak Ridge (Onshore)	38	4	65	S	reverse	1	19	49
San Cayetano	41.43	6	42	N	thrust	0	16	42
San Jacinto	42.01	n/a	90	V	strike slip	0	16	88
Cleghorn	47.75	3	90	V	strike slip	0	16	25
Santa Ynez Connected	54.32	2	70		strike slip	0	11	132
Coronado Bank	54.78	3	90	V	strike slip	0	9	186
Pitas Point Connected	56.61	1	55		reverse	1.2	13	78
Ventura-Pitas Point	56.61	1	64	N	reverse	1	15	44
North Frontal (West)	58.3	1	49	S	reverse	0	16	50
Santa Cruz Island	59.4	1	90	V	strike slip	0	13	69
Channel Islands Thrust	59.46	1.5	20	N	thrust	5	12	59

Reference: Based on USGS National Seismic Hazard Maps - Source Parameters



N

Alquist-Priolo Earthquake Fault Zone

REFERENCE: **EARTHQUAKE FAULT ZONES, CITY OF LOS ANGELES**
http://navigatela.lacity.org/navigatela/

EARTHQUAKE FAULT ZONE

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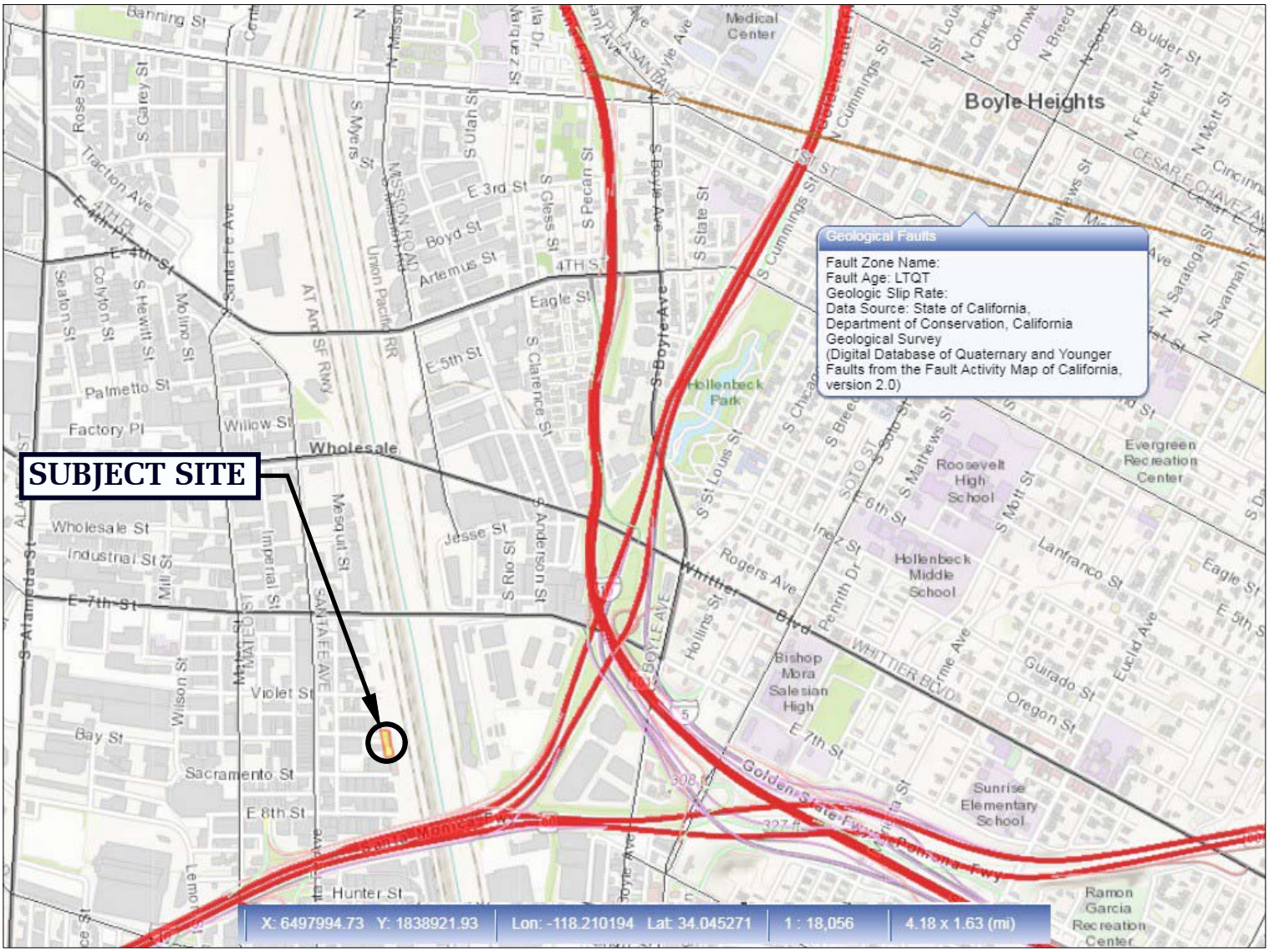

REFERENCE: CALIFORNIA GEOLOGIC SURVEY, CITY OF LOS ANGELES (www.navigatela.com)

LOCAL QUATERNARY FAULT MAP

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Consulting Geotechnical Engineers

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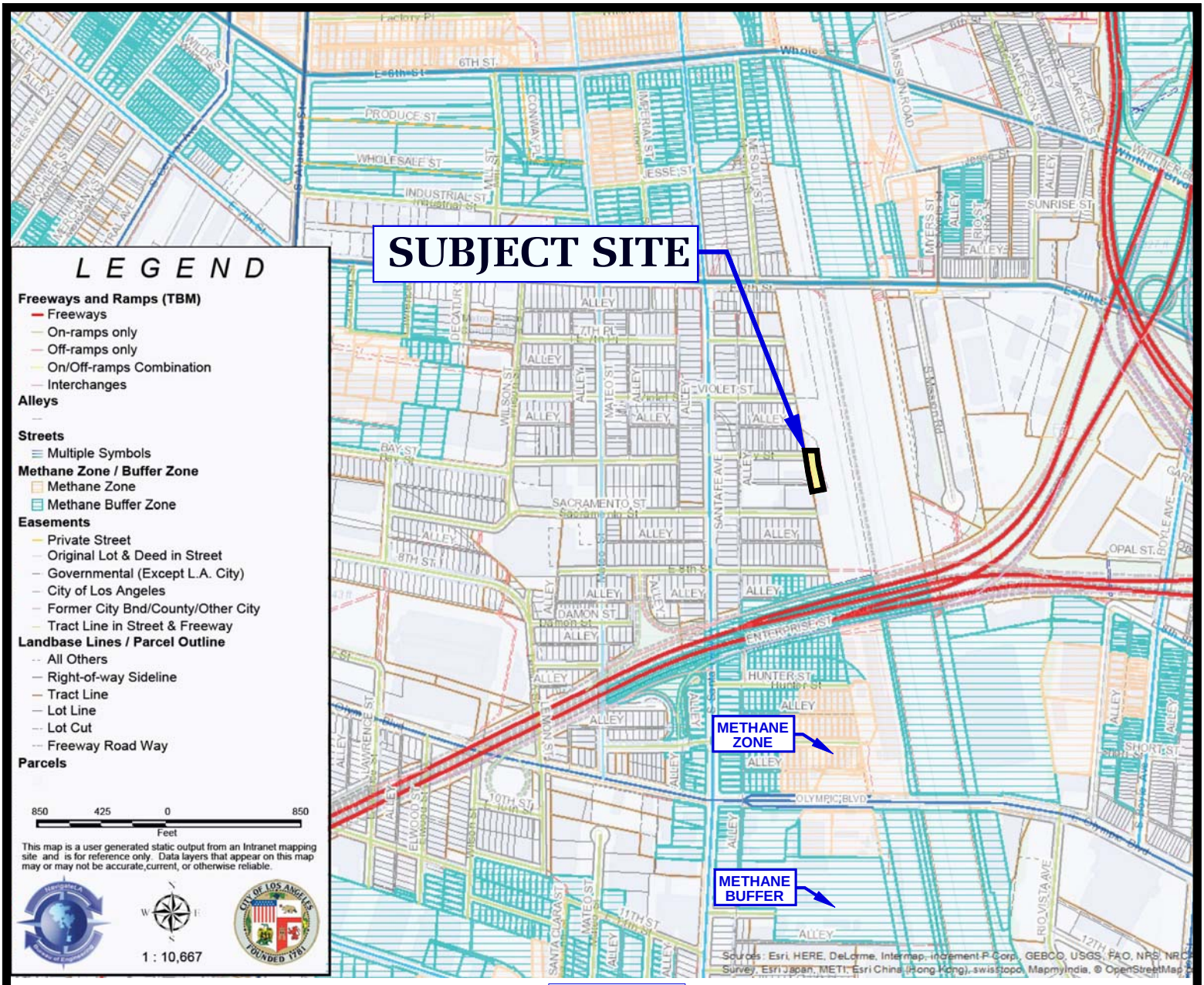

REFERENCE: http://navigatela.lacity.org/NavigateLA/

METHANE ZONE RISK MAP

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Consulting Geotechnical Engineers

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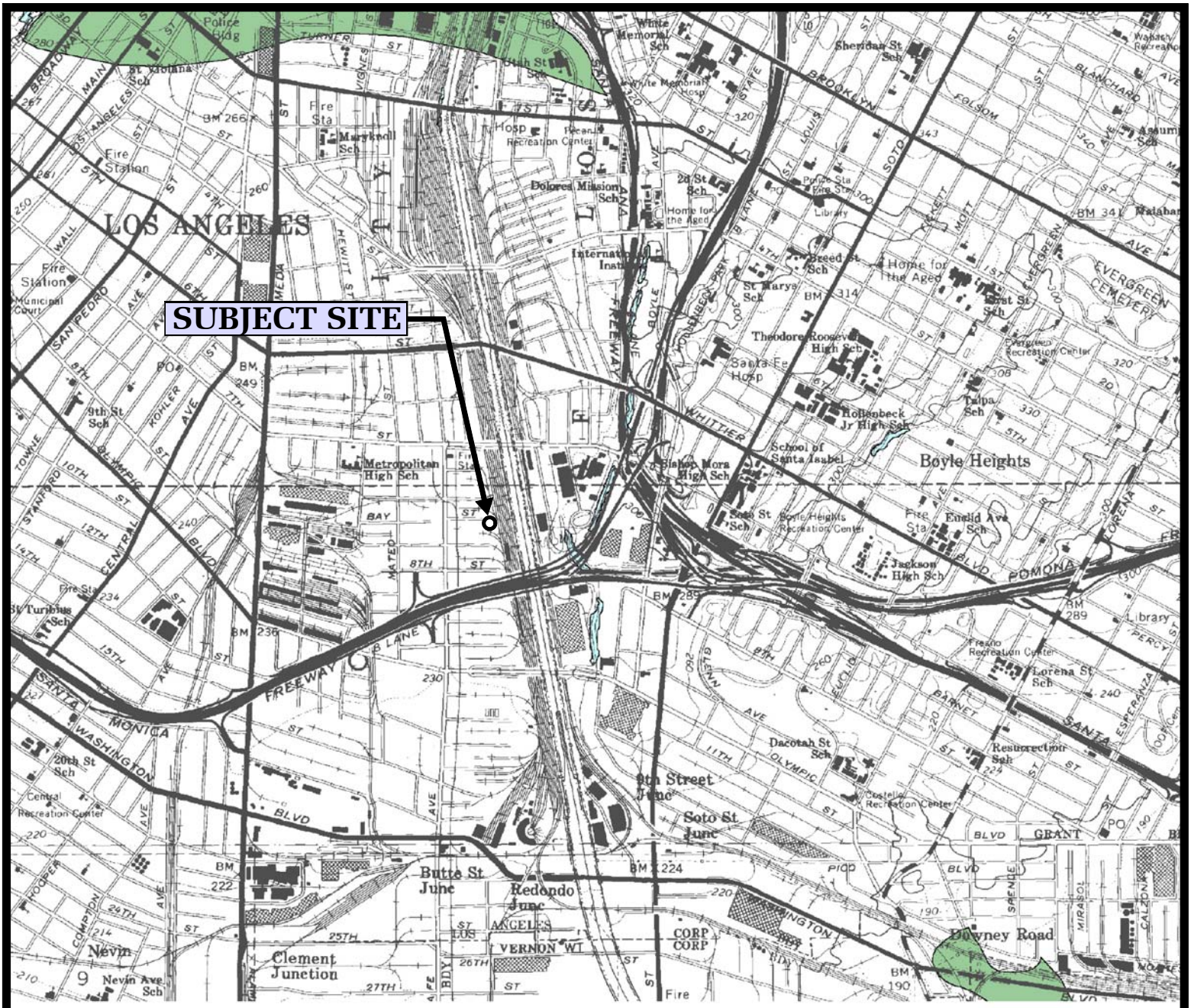

SCALE 1:24,000

1 .5 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

N

Geotechnologies, Inc

LIQUEFACTION AREA

REFERENCE: **SEISMIC HAZARD ZONES, LOS ANGELES QUADRANGLE OFFICIAL MAP (CDMG, 1999)**

SEISMIC HAZARD ZONE MAP

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Consulting Geotechnical Engineers

TISHMAN SPEYER
2159 BAY ST., LOS ANGELES

FILE NO. 21521

Appendix IS-4

Utility Infrastructure Technical Report Wastewater

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2159 BAY STREET
UTILITY INFRASTRUCTURE TECHNICAL REPORT: WASTEWATER
MARCH 13, 2018

PREPARED BY:

KPFF Consulting Engineers

700 South Flower Street, Suite 2100

Los Angeles, CA 90017

(213) 418-0201

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Appendix

1. INTRODUCTION

1.1. PROJECT DESCRIPTION

The Project includes the demolition of all existing on-site structures, and the construction and development of an eight-story commercial high-rise building with two levels of subterranean parking, and two two-story commercial buildings. The Project would include approximately 204,789 square feet of create office space and 19,235 square feet of retail and restaurant space, in combination operating as a "creative campus". The Project would provide a total of 711 vehicle parking spaces on two levels of subterranean parking levels and one ground floor parking level.

SCOPE OF WORK

As a part of the Environmental Impact Report for the Project, the purpose of this report is to analyze the potential impact of the Project to the City's wastewater infrastructure systems.

2. REGULATORY FRAMEWORK

The City of Los Angeles has one of the largest sewer systems in the world including more than 6,600 miles of sewers serving a population of more than four million. The Los Angeles sewer system is comprised of three smaller systems: Hyperion Sanitary Sewer System, Terminal Island Water Reclamation Plant Sanitary Sewer System, and Regional Sanitary Sewer System.

The Project Site lies within the Hyperion Service Area served by the Hyperion Sanitary Sewer System and the Hyperion Treatment Plant. In February 2015, a Sewer System Management Plan (SSMP) was prepared for the Hyperion Sanitary Sewer System pursuant to the State Water Control Board's (SWRCB) May 2, 2006 Statewide General Waste Discharge Requirements (WDRs)[1].

Sewer permit allocation for projects that discharge into the Hyperion Treatment Plant is regulated by Ordinance No. 166,060 adopted by the City in 1990. This Ordinance established an additional annual allotment of 5.0 million gallons per day, of which 34.5 percent (1.725 million gallons per day) is allocated for priority projects, 8 percent (0.4 million gallons per day) for public benefit projects, and 57.5 percent (2.875 million gallons per day) for non-priority projects (of which 65 percent is for residential projects and 35 percent for non-residential projects).

The City of Los Angeles Municipal Code (LAMC) includes regulations that allow the City to assure available sewer capacity for new projects and require fees for improvements to the infrastructure system. LAMC Section 64.15 requires that the City

[1] City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, February 2015.

perform a Sewer Capacity Availability Request (SCAR) analysis when any person seeks a sewer permit to connect a property to the City's sewer collection system, proposes additional discharge through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate 10,000 gallons or more of sewage per day. A SCAR is an analysis of the existing sewer collection system to determine if there is adequate capacity existing in the sewer collection system to safely convey the newly generated sewage to the appropriate sewage treatment plant.

LAMC Section 64.11.2 requires the payment of fees for new connections to the sewer system to assure the sufficiency of sewer infrastructure. New connections to the sewer system are assessed a Sewerage Facilities Charge. The rate structure for the Sewerage Facilities Charge is based upon wastewater flow strength, as well as volume. The determination of wastewater strength for each applicable project is based on City guidelines for the average wastewater concentrations of two parameters (biological oxygen demand and suspended solids) for each type of land use. Fees paid to the Sewerage Facilities Charge fees are deposited in the City's Sewer Construction and Maintenance Fund for sewer and sewage-related purposes, including but not limited to industrial waste control and water reclamation purposes.

In addition, the City establishes design criteria for sewer systems to assure that new infrastructure provides sewer capacity and operating characteristics to meet City Standards (Bureau of Engineering Special Order No. SO 06-0691). Per this Special Order, laterals sewers, which are sewers 18 inches or less in diameter, must be designed for a planning period of 100 years. The Special Order also requires that sewers be designed so that the peak dry weather flow depth during their planning period shall not exceed one-half the pipe diameter.[2]

In 2006 the City approved the Integrated Resources Plan, which incorporates a Wastewater Facilities Plan.[3] The Integrated Resources Plan was developed to meet future wastewater needs of more than 4.3 million residents expected to live within the City by 2020. In order to meet future demands posed by increased wastewater generation, the City has chosen to expand its current overall treatment capacity, while maximizing the potential to reuse recycled water through irrigation, and other approved uses.

3. EXISTING CONDITIONS

The project site is currently developed with three buildings: an approximately 25,700 square-foot building located in the southern portion of the site, referred to as the Sacramento Building or Building C (2145-2149-2159 Sacramento Street), an approximately 6,600 square-foot building located in the central portion of the site, referred to as Building B (2148 Bay Street), and an approximately 7,100 square-foot

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[2] http://www.environmentla.org/programs/thresholds/M-Public%20Utilities.pdf.

[3] City of Los Angeles, Department of Public Works, LA Sewers Website, Integrated Resources Plan Facilities Plan, Summary Report, December 2006.

building located in the northeast portion of the site, referred to as Building A (2159 Bay Street). Hyperloop One currently occupies or is in the process of building out all tenant spaces at the site, and operates uses including engineering and test development operations, office operations, and fabrication and machining operations. Exterior areas in the central and eastern portions of the site are used for storage, equipment staging, and exterior operations. Other smaller structures at the site consist of shipping containers that have been converted into offices and conference rooms, tents used for welding operations and meetings, and parking stackers. Designated areas for storage of raw materials and hazardous waste are located on the south side of Building B. Sanitary sewer service to the Project Site from the surrounding streets is provided by the Bureau of Sanitation (BOS).

Based on available record data provided by the City, there is an 8-inch vitrified clay pipe (VCP) sewer line in Bay Street flowing west. Based upon the City of Los Angeles Bureau of Engineering's online Navigate LA database, the capacity of this line is 0.71 cubic feet per second (cfs) (458,678 gallons per day (gpd)). Available records indicate that Bay Street has three (3) sewer wyes allocated to the Project Site.

Based on available record data provided by the City, there is an 8-inch vitrified clay pipe (VCP) sewer line in Sacramento Street flowing west. Based upon the Navigate LA database, the capacity of the 8-inch line is 0.71 cubic feet per second (cfs) (458,678 gallons per day (gpd)). Available records indicate the 8-inch main in Sacramento Street has three (3) sewer wyes allocated to the Project Site.

Wastewater generation estimates for the existing Project Site have been prepared based on BOS sewerage generation factors, as summarized in Table 1 below.

Table 1 – Estimated Existing Wastewater Generation

Land Use	Units	Generation Rate (gpd/unit)	Total Sewage Generation (gpd)
Existing			
Office (Bldg. A)	7,106 SF	120/KGSF	853
Light Industrial (Bldg. B & Bldg. C)	16,222 SF	50/KGSF	811
Creative Office (Bldg. C)	16,000 SF	120/KGSF	1,920
		Subtotal Existing	**3,584**

4. SIGNIFICANCE THRESHOLDS

Appendix G of the CEQA Guidelines provides a set of sample questions that address impacts with regard to wastewater. These questions are as follows:

Would the project:

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

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

- 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?

In the context of the above questions from the CEQA Guidelines, the *L.A. CEQA Thresholds Guide* states that a project would normally have a significant wastewater impact if:

- The project would cause a measureable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or

- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

These thresholds are applicable to the Project and as such are used to determine if the Project would have significant wastewater impacts.

5. METHODOLOGY

The methodology for determining the significance of a project as it relates to a project's impact on wastewater collection and treatment infrastructure is based on the *L.A. CEQA Thresholds Guide*. This methodology involves a review of the project's environmental setting, project impacts, cumulative impacts, and mitigation measures (if required). The following has been considered as part of the determination for this Project:

Environmental Setting

- Location of the Project and appropriate points of connection to the wastewater collection system on the pertinent Wye Map;

- Description of the existing wastewater system which would serve the Project, including its capacity and current flows.

- Summary of adopted wastewater-related plans and policies that are relevant to the Project area.

Project Impacts

- Evaluate the Project wastewater needs (anticipated daily average wastewater flow), taking into account design or operational features that would reduce or offset service impacts;

- Compare the Project's wastewater needs to the appropriate sewer's capacity and/or the wastewater flows anticipated in the Wastewater Facilities Plan or General Plan.

This report analyzes the potential impacts of the Project on the existing public sewer infrastructure by comparing the estimated Project wastewater generation with the calculated available capacity of the existing facilities.

Pursuant to LAMC Section 64.15, BOS Wastewater Engineering Division made a preliminary analysis of the local and regional sewer conditions to determine if available wastewater conveyance and treatment capacity exists for future development of the Project Site. BOS's approach consisted of the study of a worst-case scenario envisioning peak demands from the relevant facilities occurring simultaneously on the wastewater system. A combination of flow gauging data and computed results from the City's hydrodynamic model were used to project current and future impacts due to additional sewer discharge. The data used in this report are based on the findings of the BOS preliminary analysis. Refer to Exhibit 1 for the SCAR prepared for the Project, which contains the results of the BOS preliminary analysis.

6. PROJECT IMPACTS

6.1. CONSTRUCTION

Construction activities for the Project would result in a temporary increase in wastewater generation as a result of construction activities at the Project Site. Wastewater generation would occur incrementally throughout construction of the Project as a result of construction workers on-site. However, construction workers would utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Thus wastewater generation from Project construction activities is not anticipated to cause any increase in wastewater flows. Therefore, Project impacts associated with construction-period wastewater generation would be less than significant.

The Project will require construction of new on-site infrastructure to serve the new building, and potential upgrade and/or relocation of existing infrastructure. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure will be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work is required in order to connect to the public main. Therefore, as part of the Project, a construction management plan would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining two lanes of travel and ensuring safe

pedestrian access and adequate emergency vehicle access. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. Therefore, Project impacts on wastewater associated with construction activities would be less than significant.

6.2. OPERATION

In accordance with the *L.A. CEQA Thresholds Guide*, the base estimated sewer flows were based on the sewer generation factors for the Project's uses. Based on the type of use and generation factors, the Project will generate approximately 68,472 gallons per day (gpd) of wastewater. Wastewater generation estimates have been prepared based on the City of LA Bureau of Sanitation sewerage generation factors for residential and commercial categories, and are summarized in Table 2 below.

Table 2 – Estimated Proposed Water Consumption			
Land Use	**Units**	**Consumption Rate (gpd/unit)**	**Total Water Consumption (gpd)**
Existing			
Office (Bldg. A)	7,106 SF	120/KGSF	853
Light Industrial (Bldg. B & Bldg. C)	16,222 SF	50/KGSF	811
Creative Office (Bldg. C)	16,000 SF	120/KGSF	1,920
		Subtotal Existing	**3,584**
Proposed			
Office Building	202,954 SF	120/KGSF	24,354
Auditorium	216 Seats[(a)]	3/Seat	648
Restaurant: Full Services Indoor Seat	1,067 Seats[(a)]	30/Seat	32,010
Restaurant: Full Services Outdoor Seat	382 Seats[(a)]	30/Seat	11,460
		Subtotal Proposed	**68,472**
		Net Increase	**64,888**
[(a)] Assumed 15 SF per person to estimate existing seat count.[4]			

A SCAR was submitted to see whether the existing public infrastructure can accommodate the Project. It was assumed that approximately half of the proposed sewer discharge would go into the existing 8-inch sewer main in Bay Street. The remainder of the proposed sewer discharge would go to the existing 8-inch sewer main in Sacramento Street. The Bureau of Sanitation has analyzed the Project demands in conjunction with existing conditions and forecasted growth, and has approved the Project to discharge up to 68,472 gpd of wastewater to the existing sewer mains in Bay Street and Sacramento Street. Therefore, impacts on wastewater would be less than significant. See Exhibit 1 for the approved SCAR.

BOS operates four water reclamation plants that serve over four million people. They consist of the Hyperion Water Reclamation Plant, the Terminal Island Water Reclamation Plant, the Donald C. Tillman Water Reclamation Plant, Reclamation Plant, and the Los Angeles–Glendale Water Reclamation Plant. Together, they have a combined

[4] International Code Council. (2014). 2015 International Building Code, Section 1004.1.2. Country Club Hills. ICC.

capacity of 580 million gallons of recycled water per day.[5] The Project's proposed wastewater generation of approximately 0.068 mgd will be treated at the Hyperion Water Reclamation Plant. On average 275 million gallons of wastewater enters the Hyperion Water Reclamation Plant on a dry weather day. The plant was designed to accommodate a maximum daily flow of 450 mgd [6], resulting in an available treatment capacity of 175 mgd. This means the project would create 0.039 percent of the available capacity. Consequently, impacts on wastewater treatment capacity are less than significant.

As stated above, the existing capacity of the 8-inch sewer line in Sacramento Street is approximately 0.71 cubic feet per second (cfs) (458,678 gallons per day (gpd)). The Project's net increase in sewage generation is approximately 64,888 gpd. This represents approximately fourteen percent of the pipe's capacity. Due to this fact, and the approved SCAR, impacts on wastewater infrastructure would be less than significant.

6.3. CUMULATIVE IMPACTS

The proposed Project will result in the additional generation of sewer flow. However, as discussed above, BOS has conducted an analysis of existing and planned capacity and determined that adequate capacity exists to serve the Project. Related projects connecting to the same sewer system are required to obtain a sewer connection permit and submit a SCAR to BOS as part of the related project's development review. Impact determination will be provided following the completion of the SCAR analysis for each project. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related project and BOS to construct the necessary improvements.

Wastewater generated by the proposed Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant. As previously stated, based on information from BOS, the existing design capacity of the Hyperion Water Reclamation Plant is approximately 450 million gallons per day (mgd) and the existing average daily flow for the system is approximately 275 mgd.[6] The estimated wastewater generation increase of 64,888 gpd summarized in Table 2 comprises less than 0.044 percent of the available capacity (175 mgd approximately) in the system. It is expected that the related projects would also be required to adhere to the BOS's annual wastewater flow increase allotment.

Based on these forecasts the Project's increase in wastewater generation would be adequately accommodated within the Hyperion Service Area. In addition, the BOS

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[5] City of Los Angeles Department of Public Works, Bureau of Sanitation, Water Reclamation Plants, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?_adf.ctrl-state=14ml1auzba_4&_afrLoop=7495087836967533#!

[6] City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant. https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=14ml1auzba_4&_afrLoop=7495506219572866#!

analysis confirms that the Hyperion Treatment Plant has sufficient capacity and regulatory allotment for the proposed Project. Thus, operation of the Project would have a less than significant impact on wastewater treatment facilities.

7. LEVEL OF SIGNIFICANCE

Based on the analysis contained in this report no significant impacts have been identified to wastewater infrastructure for this Project.

EXHIBIT 1

City of Los Angeles
Bureau of Engineering

Sewer Capacity Availability Request (SCAR)

To: Bureau of Sanitation
The following request is submitted to you on behalf of the applicant requesting to connect to the public sewer system. Please verify that the capacity exists at the requested location for the proposed developments shown below. The results are good for 180 days from the date the sewer capacity approval from the Bureau of Sanitation.

Job Address:	**2159 BAY STREET**	Sanitation Scar ID:	**62-3978-1217**
Date Submitted	12/11/2017	Request Will Serve Letter?	Yes
BOE District:	Central District		
Applicant:	CHRISTOPHE BORNAND		
Address:	700 S FLOWER ST, SUITE 2100	City :	LOS ANGELES
State:	CA	Zip:	90017
Phone:	213.418.0201	Fax:	
Email:	CHRISTOPHE.BORNAND@KPFF.COM	BPA No.	
S-Map:		Wye Map:	123-A

SIMM Map - Maintenance Hole Locations

No.	Street Name	U/S MH	D/S MH	Diam. (in)	Approved Flow %	Notes
1	BAY STREET	51513080	51513079	8	50.00	
2	SACRAMENTO STREET	51513097	51513096	8	50.00	

Proposed Facility Description

No.	Proposed Use Description	Sewage Generation (GPD)	Unit	Qty	GPD
1	OFFICE BUILDING	120	KGSF	202,954	24,354
2	AUDITORIUM	3	SEAT	216	648
3	RESTAURANT: FULL SERVICE INDOOR SEAT	30	SEAT	1,067	32,010
4	RESTAURANT: FULL SERVICE OUTDOOR SEAT	30	SEAT	382	11,460
			Proposed Total Flow (gpd):		**68,472**

Remarks 1] SCAR approved for requested discharge of 68,472 GPD (47.55 gpm) 2] IWP required

Note: Results are good for 180 days from the date of approval by the Bureau of Sanitation

Date Processed: 12/14/2017 Expires On: 06/12/2018

Processed by: Albert Lew
Bureau of Sanitation
Phone: 323-342-6207
Sanitation Status: Approved
Reviewed by: Airmohammad Jafarnejad
on 12/14/2017

Submitted by: Alfredo Jara
Bureau of Engineering
Central District
Phone: 213-482-7041

Fees Collected Yes SCAR FEE (W:37 / QC:705) $1,996.50

Scar Request Number: 2162

Date Collected	12/11/2017	SCAR Status:	**Completed**

Scar Request Number: 2162

City of Los Angeles
Bureau of Engineering

SEWER CAPACITY AVAILABILITY REVIEW FEE (SCARF) - Frequently Asked Questions

SCAR stands for Sewer Capacity Availability Review that is performed by the Department of Public Works, Bureau of Sanitation. This review evaluates the existing sewer system to determine if there is adequate capacity to safely convey sewage from proposed development projects, proposed construction projects, proposed groundwater dewatering projects and proposed increases of sewage from existing facilities. The SCAR Fee (SCARF) recovers the cost, incurred by the City, in performing the review for any SCAR request that is expected to generate 10,000 gallons per day (gpd) of sewage.

The SCARF is based on the effort required to perform data collection and engineering analysis in completing a SCAR. A brief summary of that effort includes, but is not limited to, the following:

1. Research and trace sewer flow levels upstream and downstream of the point of connection.
2. Conduct field surveys to observe and record flow levels. Coordinate with maintenance staff to inspect sewer maintenance holes and conduct smoke and dye testing if necessary.
3. Review recent gauging data and in some cases closed circuit TV inspection (CCTV) videos.
4. Perform gauging and CCTV inspection if recent data is not available.
5. Research the project location area for other recently approved SCARs to evaluate the cumulated impact of all known SCARs on the sewer system.
6. Calculate the impact of the proposed additional sewage discharge on the existing sewer system as it will be impacted from the approved SCARs from Item 6 above. This includes tracing the cumulative impacts of all known SCARs, along with the subject SCAR, downstream to insure sufficient capacity exist throughout the system.
7. Correspond with the applicant for additional information and project and clarification as necessary.
8. Work with the applicant to find alternative sewer connection points and solutions if sufficient capacity does not exist at the desired point of connection.

Questions and Answers:

1. **When is the SCARF applied, or charged?**
   It applies to all applicants seeking a Sewer Capacity Availability Review (SCAR). SCARs are generally required for Sewer Facility Certificate applications exceeding 10,000 gpd, or request from a property owner seeking to increase their discharge thru their existing connection by 10,000 gpd or more, or any groundwater related project that discharges 10,000 gpd or more, or any proposed or future development for a project that could result in a discharge of 10,000 gpd.
2. **Why is the SCARF being charged now when it has not been in the past?**
   The City has seen a dramatic increase in the number of SCARs over 10,000 gpd in the last few years and has needed to increase its resources, i.e., staff and gauging efforts, to respond to them. The funds collected thru SCARF will help the City pay for these additional resources and will be paid by developers and property owners that receive the benefit from the SCAR effort.
3. **Where does the SCARF get paid?**
   The Department of Public Works, Bureau of Engineering (BOE) collects the fee at its public counters. Once the fee is paid then BOE prepares a SCAR request and forwards it to the BOS where it is reviewed and then returned to BOE. BOE then informs the applicant of the result. In some cases, BOS works directly with the applicant during the review of the SCAR to seek additional information and work out alternative solutions

Scar Request Number: 2162

CITY OF LOS ANGELES

CALIFORNIA

DEPARTMENT OF PUBLIC WORKS

BUREAU OF ENGINEERING

GARY LEE MOORE, PE, ENV SP
CITY ENGINEER

1149 S BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213

http://eng.lacity.org

12/14/2017

CHRISTOPHE BORNAND
700 S FLOWER ST, SUITE 2100
LOS ANGELES, CA, 90017

Dear CHRISTOPHE BORNAND,

SEWER AVAILABILITY: 2159 BAY STREET

The Bureau of Sanitation has reviewed your request of 12/11/2017 for sewer availability at **2159 BAY STREET**. Based on their analysis, it has been determined on 12/14/2017 that there is capacity available to handle the anticipated discharge from your proposed project(s) as indicated in the attached copy of the Sewer Capacity Availability Request (SCAR) .

This determination is valid for 180 days from the date shown on the Sewer Capacity Availability request (SCAR) approved by the Bureau of Sanitation.

While there is hydraulic capacity available in the local sewer system at this time, availability of sewer treatment capacity will be determined at the Bureau of Engineering Public Counter upon presentation of this letter. A Sewer Connection Permit may also be obtained at the same counter provided treatment capacity is available at the time of application.

A Sewerage Facilities Charge is due on all new buildings constructed within the City. The amount of this charge will be determined when application is made for your building permit and the Bureau of Engineering has the opportunity to review the building plans. To facilitate this determination a preliminary set of plans should be submitted to Bureau of Engineering District Office, Public Counter.

Provision for a clean out structure and/or a sewer trap satisfactory to the Department of Building and Safety may be required as part of the sewer connection permit.

Sincerely,

Alfredo Jara
Student Intern
Central District, Bureau of Engineering

Scar Request Number: 2162

City of Los Angeles
Bureau of Engineering

SEWER CAPACITY AVAILABILITY REVIEW FEE (SCARF) - Frequently Asked Questions

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The SCARF is based on the effort required to perform data collection and engineering analysis in completing a SCAR. A brief summary of that effort includes, but is not limited to, the following:

1. Research and trace sewer flow levels upstream and downstream of the point of connection.
2. Conduct field surveys to observe and record flow levels. Coordinate with maintenance staff to inspect sewer maintenance holes and conduct smoke and dye testing if necessary.
3. Review recent gauging data and in some cases closed circuit TV inspection (CCTV) videos.
4. Perform gauging and CCTV inspection if recent data is not available.
5. Research the project location area for other recently approved SCARs to evaluate the cumulated impact of all known SCARs on the sewer system.
6. Calculate the impact of the proposed additional sewage discharge on the existing sewer system as it will be impacted from the approved SCARs from Item 6 above. This includes tracing the cumulative impacts of all known SCARs, along with the subject SCAR, downstream to insure sufficient capacity exist throughout the system.
7. Correspond with the applicant for additional information and project and clarification as necessary.
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Questions and Answers:

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   It applies to all applicants seeking a Sewer Capacity Availability Review (SCAR). SCARs are generally required for Sewer Facility Certificate applications exceeding 10,000 gpd, or request from a property owner seeking to increase their discharge thru their existing connection by 10,000 gpd or more, or any groundwater related project that discharges 10,000 gpd or more, or any proposed or future development for a project that could result in a discharge of 10,000 gpd.
2. **Why is the SCARF being charged now when it has not been in the past?**
   The City has seen a dramatic increase in the number of SCARs over 10,000 gpd in the last few years and has needed to increase its resources, i.e., staff and gauging efforts, to respond to them. The funds collected thru SCARF will help the City pay for these additional resources and will be paid by developers and property owners that receive the benefit from the SCAR effort.
3. **Where does the SCARF get paid?**
   The Department of Public Works, Bureau of Engineering (BOE) collects the fee at its public counters. Once the fee is paid then BOE prepares a SCAR request and forwards it to the BOS where it is reviewed and then returned to BOE. BOE then informs the applicant of the result. In some cases, BOS works directly with the applicant during the review of the SCAR to seek additional information and work out alternative solutions

Appendix A.2

Notice of Preparation (NOP)

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

NOTICE OF PREPARATION
OF ENVIRONMENTAL IMPACT REPORT

August 24, 2018

ENVIRONMENTAL CASE NO.:	ENV-2017-625-EIR
PROJECT NAME:	2159 Bay Street Project
PROJECT APPLICANT:	Sacramento Street Property LP
PROJECT ADDRESS:	2136–2148 and 2159 E. Bay Street, and 2145–2161 E. Sacramento Street, Los Angeles, CA 90021
COMMUNITY PLAN AREA:	Central City North
COUNCIL DISTRICT:	14—José Huizar
PUBLIC COMMENT PERIOD:	August 24, 2018–September 24, 2018

The City of Los Angeles (City) intends to prepare an Environmental Impact Report (EIR) for the proposed 2159 Bay Street Project (Project). In accordance with Section 15082 of the California Environmental Quality Act (CEQA) Guidelines, the City has prepared this Notice of Preparation to provide the public, nearby residents and property owners, responsible agencies, and other interested parties with information regarding the Project and its potential environmental effects. The EIR will be prepared by outside consultants under the supervision of the City of Los Angeles, Department of City Planning.

The City requests your written comments as to the scope and contents of the EIR, including mitigation measures or project alternatives to reduce potential environmental impacts from the Project. Comments must be submitted in writing according to directions below. If you represent a public agency, the City seeks written comments as to the scope and content of the environmental information in the EIR that are germane to your agency's statutory responsibilities in connection with the Project. Your agency may need to use the EIR prepared by the City when considering your permit or other approval for the Project.

PROJECT LOCATION AND EXISTING ON-SITE USES:
The Project Site is located at 2136–2148 and 2159 E. Bay Street, and 2145–2161 E. Sacramento Street, at the at the eastern termini of Bay Street and Sacramento Street, in the Central City North Community Plan Area of the City of Los Angeles, approximately 14 miles east of the Pacific Ocean. The Project Site is currently developed with three existing buildings which include 39,328 square feet of office and industrial uses. (See attached Project Location Map.)

PROJECT DESCRIPTION:
The Project includes the development of a three-building creative office campus that would be comprised of an eight-story commercial high-rise building with up to two levels of subterranean parking, and two two-story commercial buildings. The Project would specifically include approximately 202,954 square feet of creative office space, 16,000 square feet of retail and restaurant space, and 3,235 square feet of event and meeting space. The Project would provide a total of 711 vehicle parking spaces within up to two levels of subterranean parking levels and one ground floor parking level. To provide for the Project, all existing buildings and uses would be demolished, including the three existing buildings which include 39,328 square feet of office and industrial uses.

The Project would create a pedestrian environment along Bay Street and Sacramento Street, an area that currently lacks pedestrian infrastructure, by constructing new sidewalks, street trees, ground floor commercial space with storefront glazing, and a lobby entrance for the office/creative office tenants along a pedestrian paseo. Vehicular access to the Project would be provided from driveways located on Bay Street and Sacramento Street, and a lay-by for passenger drop-off and pick-up on Bay Street. Levels 2 through 8 of the high-rise building would include outdoor terraces for the building's office tenants, and a pedestrian paseo would be provided on the eastern portion of the Site.

Overall, as shown in Table 1, the Project would remove approximately 39,328 square feet of existing floor area and develop approximately 222,189 square feet of floor area, resulting in a net increase of approximately 182,861 square feet of floor area. The Project would have a FAR of 3:1.

Table 1
Summary of Existing, Proposed Demolition, and Proposed New Floor Areas

Land Use	Existing	Proposed Demolition	Proposed Construction	Net New
Creative Office	16,000 sf	(16,000 sf)	202,954 sf	186,954 sf
Office	7,106 sf	(7,106 sf)	—	(7,106 sf)
Light Industrial	16,222 sf	(16,222 sf)	—	(16,222 sf)
Retail/Restaurant	—	—	16,000 sf	16,000 sf
Event/Meeting Space	—	—	3,235 sf	3,235 sf
Total	**39,328 sf**	**(39,328 sf)**	**222,189 sf**	**182,861 sf**

sf = square feet
Source: Eyestone Environmental, 2018.

REQUESTED ACTIONS:
1. Vesting Zone and Height District Change from M3-1-RIO to M3-2D-RIO
2. Site Plan Review for the construction of a mixed-use commercial building with 222,189 square feet of floor area
3. Zoning Administrator's Adjustment to allow use of pre-dedication lot area to calculate FAR
4. Master Conditional Use Permit to allow the sale and/or dispensing of a full line of alcoholic beverages for on- and off-site consumption for up to six establishments
5. Vesting Tentative Tract Map with one ground lot and four commercial condominium units

POTENTIAL ENVIRONMENTAL EFFECTS OF THE PROJECT:
Based on an Initial Study, the Project could have potentially significant environmental impacts in the following topic areas, which will be addressed in the EIR: Air Quality, Cultural Resources (historical resources, archaeological resources, and paleontological resources), Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services (fire protection and police protection), Transportation/Traffic, Tribal Cultural Resources, and Utilities and Service Systems (water). In addition, in accordance with Appendix F of the CEQA Guidelines, energy conservation will be addressed in the EIR.

FILE REVIEW AND COMMENTS:
The environmental file is available for public review at the City of Los Angeles, Department of City Planning, 221 N. Figueroa Street, Suite 1350, Los Angeles, CA 90012, during office hours Monday–Friday, 9:00 A.M.–4:00 P.M. To review the file, please contact the Staff Planner listed below to schedule an appointment. A copy of this notice and the Initial Study prepared for the Project may be viewed with the environmental file or online

at http://planning.lacity.org by clicking on the "Environmental Review" tab, then "Notice of Preparation & Public Scoping Meetings," and then clicking on the document links below the Project title.

The City will consider all written comments regarding the potential environmental impacts of the Project and issues to be addressed in the EIR. If you wish to submit comments, please reference the Environmental Case No. above, and submit them in writing by **Monday, September 24, 2018, no later than 4:00 P.M.** Please direct your comments to:

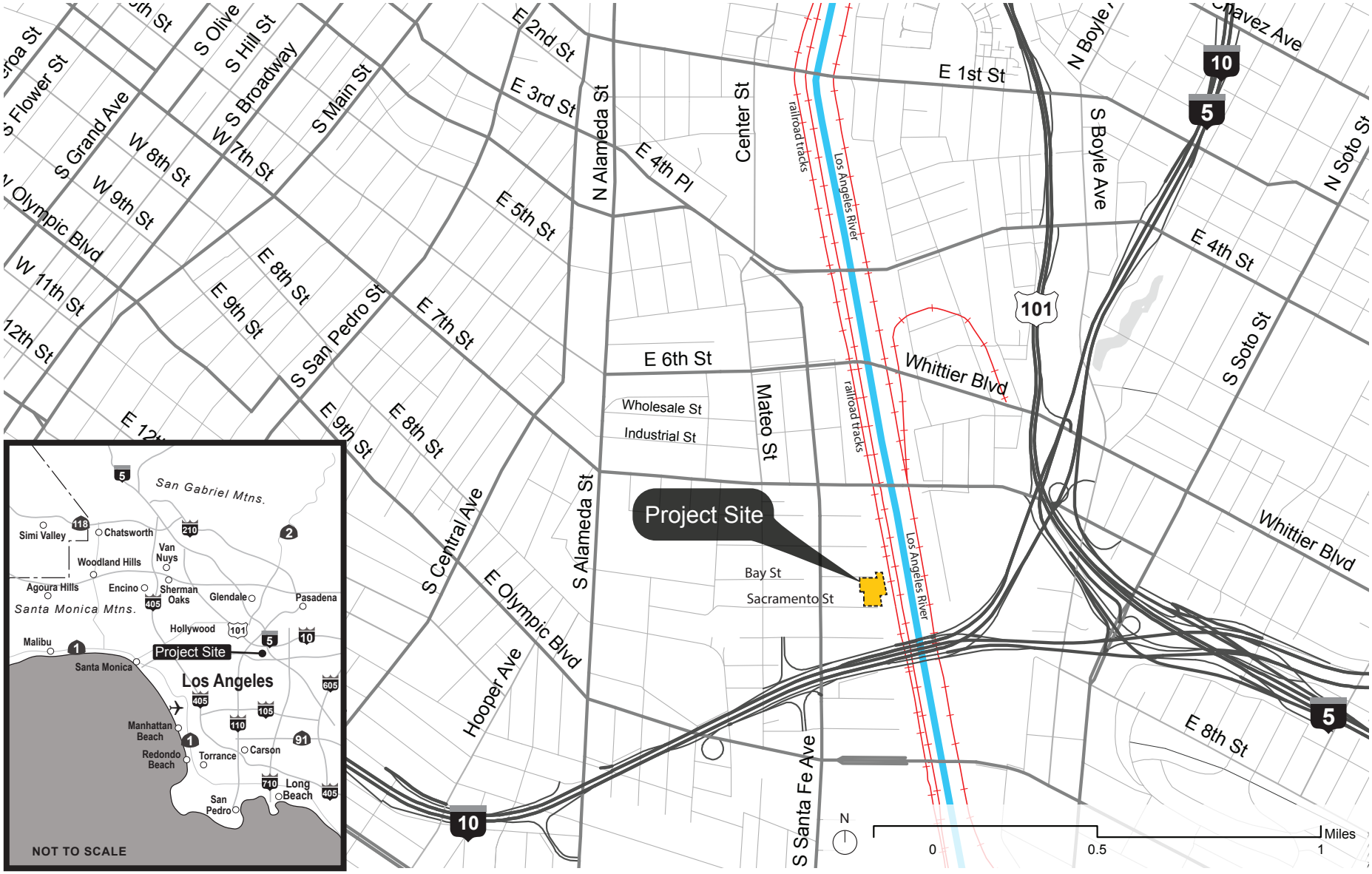
Mail:	Kathleen King City of Los Angeles, Department of City Planning 221 N. Figueroa St., Suite 1350 Los Angeles, CA 90012
E-Mail:	kathleen.king@lacity.org

VINCENT P. BERTONI, AICP
Director of Planning

Kathleen King
Major Projects Section
Department of City Planning
(213) 847-3746

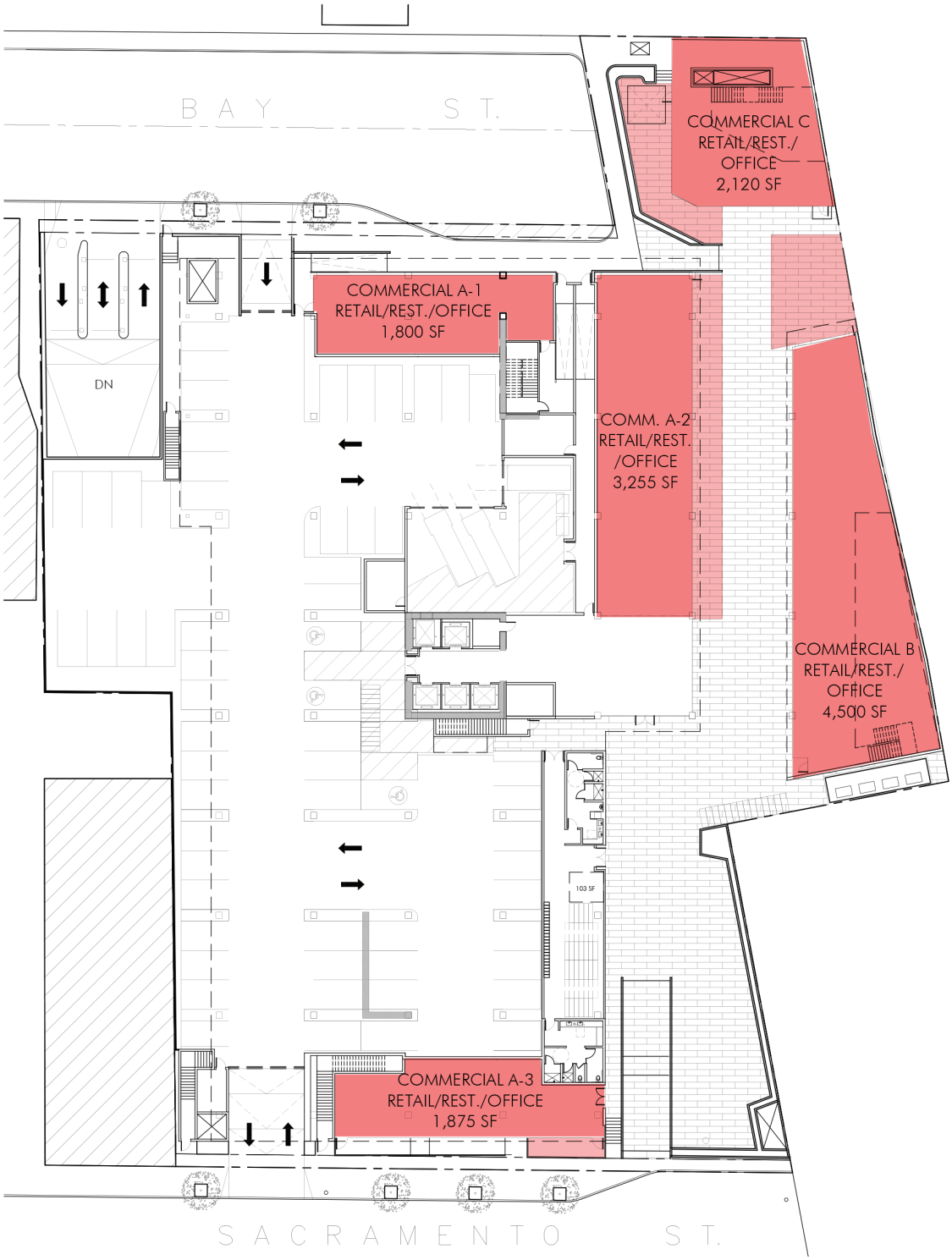
Attachments:
Project Site Map
Conceptual Site Plan—Ground Level

Puede obtener información en Español acerca de esta junta llamando al (213) 847-3641.



Project Site Map

Source: Los Angeles County GIS, 2015; Eyestone Environmental, 2018.



GROUND FLOOR PLAN

Conceptual Site Plan—Ground Level

Source: Shimoda Design Group, 2018.

Appendix A.3

NOP Comment Letters

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

Notice of Preparation

August 24, 2018

To: Reviewing Agencies

Re: 2159 Bay Street Project
SCH# 2018081070

Attached for your review and comment is the Notice of Preparation (NOP) for the 2159 Bay Street Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Kathleen King
City of Los Angeles
221 N. Figueroa St, Suite 1450
Los Angeles, CA 90012

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
1-916-322-2318 FAX 1-916-558-3184 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2018081070
Project Title 2159 Bay Street Project
Lead Agency Los Angeles, City of

Type NOP Notice of Preparation

Description The project includes the development of a three-building creative office campus that would be comprised of an 8 story commercial high-rise building with up to 2 levels of subterranean parking, and two 2-story commercial buildings. The project would specifically include approx 202,954 sf of creative office space, 16,000 sf of retail and restaurant space, and 3,235 sf of event and meeting space. The project would provide a total of 711 vehicle parking spaces within up to 2 levels of subterranean parking levels and one ground floor parking level. To provide for the project, all existing buildings and uses would be removed, including the 3 existing buildings which include 39,328 sf of office and industrial uses.

Lead Agency Contact

Name Kathleen King
Agency City of Los Angeles
Phone (213) 847-3746 **Fax**
email
Address 221 N. Figueroa St, Suite 1450
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City
Region
Cross Streets Bay St/Santa Fe Ave and Sacramento St/Santa Fe Ave
Lat / Long 34° 01' 53.6" N / 118° 13' 40.5" W
Parcel No. 5166-005-010, -013, -009, -008
Township 1S **Range** 13W **Section** 9 **Base**

Proximity to:

Highways US 101, I-5, I-10, SR-60
Airports
Railways BNSF RR
Waterways LA River
Schools SEA Charter, Oscar De La Hoya Animo Charter HS, Kipp La Prep, Ki
Land Use office and industrial land uses/M3-1-RIO/Heavy industrial

Project Issues Air Quality; Archaeologic-Historic; Drainage/Absorption; Noise; Public Services; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Landuse; Tribal Cultural Resources; Other Issues

Reviewing Agencies Resources Agency; Office of Historic Preservation; Department of Parks and Recreation; Office of Emergency Services, California; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; Public Utilities Commission; Caltrans, District 7; Regional Water Quality Control Board, Region 4; State Water Resources Control Board, Division of Drinking Water, District 15; Department of Water Resources; California Highway Patrol

Date Received 08/24/2018 **Start of Review** 08/24/2018 **End of Review** 09/24/2018

Note: Blanks in data fields result from insufficient information provided by lead agency.

Print Form

Appendix C

Notice of Completion & Environmental Document Transmittal

2018081070

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # [illegible]

Project Title: 2159 Bay Street Project

Lead Agency: City of Los Angeles
Contact Person:
Mailing Address: 221 North Figueroa Street, Suite 1450
Phone: (213) 874-XXXX
City: Los Angeles Zip: 90012
County: Los Angeles

Project Location: County: Los Angeles City/Nearest Community: Central City
Cross Streets: Bay Street/Santa Fe Avenue and Sacramento Street/Santa Fe Avenue Zip Code: 90021
Longitude/Latitude (degrees, minutes and seconds): 34 ° 01 ' 53.62" N / 118 ° 13 ' 40.56" W Total Acres: 1.70
Assessor's Parcel No.: APNs 5166-005-010, -013, -009, -008, and 5166-001-002 Section: 9 Twp.: 1S Range: 13W Base:
Within 2 Miles: State Hwy #: US-101, I-5, I-10, SR-60 Waterways: Los Angeles River
Airports: Railways: BNSF Railroad Schools: SEA Charter School
Oscar De La Hoya Animo Charter High School
Kipp La Prep, Kipp Promesa Prep
Animo Jefferson Charter Middle School

Document Type:

CEQA: [x] NOP [ ] Draft EIR NEPA: [ ] NOI Other: [ ] Joint Document
[ ] Early Cons [ ] Supplement/Subsequent EIR [ ] EA [ ] Final Document
[ ] Neg Dec (Prior SCH No.) [ ] Draft EIS [ ] Other:
[ ] Mit Neg Dec Other: [ ] FONSI

Governor's Office of Planning & Research

AUG 24 2018

STATE CLEARINGHOUSE

Local Action Type:

[ ] General Plan Update [ ] Specific Plan [x] Rezone [ ] Annexation
[ ] General Plan Amendment [ ] Master Plan [ ] Prezone [ ] Redevelopment
[ ] General Plan Element [ ] Planned Unit Development [x] Use Permit [ ] Coastal Permit
[ ] Community Plan [x] Site Plan [ ] Land Division (Subdivision, Parcel Map, Tract Map) [ ] Other: Zoning Administrator's Adjustment

Development Type:

[ ] Residential: Units Acres
[x] Office: Sq.ft. 202,954 Acres Employees [ ] Transportation: Type
[x] Commercial: Sq.ft. 16,000 Acres Employees [ ] Mining: Mineral
[ ] Industrial: Sq.ft. Acres Employees [ ] Power: Type MW
[ ] Educational: [ ] Waste Treatment: Type MGD
[ ] Recreational: [ ] Hazardous Waste: Type
[ ] Water Facilities: Type MGD [x] Other: 3,235 of event and meeting space

Project Issues Discussed in Document:

[ ] Aesthetic/Visual [ ] Fiscal [ ] Recreation/Parks [ ] Vegetation
[ ] Agricultural Land [ ] Flood Plain/Flooding [ ] Schools/Universities [x] Water Quality
[x] Air Quality [ ] Forest Land/Fire Hazard [ ] Septic Systems [x] Water Supply/Groundwater
[x] Archeological/Historical [ ] Geologic/Seismic [ ] Sewer Capacity [ ] Wetland/Riparian
[ ] Biological Resources [ ] Minerals [x] Soil Erosion/Compaction/Grading [ ] Growth Inducement
[ ] Coastal Zone [x] Noise [ ] Solid Waste [x] Land Use
[x] Drainage/Absorption [ ] Population/Housing Balance [x] Toxic/Hazardous [ ] Cumulative Effects
[ ] Economic/Jobs [x] Public Services/Facilities [x] Traffic/Circulation [x] Other: GHG, Tribal Cultural Resources

Present Land Use/Zoning/General Plan Designation:

Office and Industrial Land Uses/M3-1-RIO/Heavy Industrial

Project Description: *(please use a separate page if necessary)*

The Project includes the development of a three-building creative office campus that would be comprised of an eight-story commercial high-rise building with up to two levels of subterranean parking, and two two-story commercial buildings. The Project would specifically include approximately 202,954 square feet of creative office space, 16,000 square feet of retail and restaurant space, and 3,235 square feet of event and meeting space. The Project would provide a total of 711 vehicle parking spaces within up to two levels of subterranean parking levels and one ground floor parking level. To provide for the Project, all existing buildings and uses would be removed, including the three existing buildings which include 39,328 square feet of office and industrial uses.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Revised 2010

NOP Distribution List MS

County: Los Angeles **SCH#** 2018081070

Resources Agency

- [x] **Resources Agency** Nadell Gayou
- [ ] **Dept. of Boating & Waterways** Denise Peterson
- [ ] **California Coastal Commission** Allyson Hitt
- [ ] **Colorado River Board** Elsa Contreras
- [ ] **Dept. of Conservation** Crina Chan
- [ ] **Cal Fire** Dan Foster
- [ ] **Central Valley Flood Protection Board** James Herota
- [ ] **Office of Historic Preservation** Ron Parsons
- [x] **Dept of Parks & Recreation** Environmental Stewardship Section
- [ ] **S.F. Bay Conservation & Dev't. Comm.** Steve Goldbeck
- [ ] **Dept. of Water Resources** Resources Agency Nadell Gayou

Fish and Game

- [ ] **Depart. of Fish & Wildlife** Scott Flint Environmental Services Division
- [ ] **Fish & Wildlife Region 1** Curt Babcock
- [ ] **Fish & Wildlife Region 1E** Laurie Harnsberger
- [ ] **Fish & Wildlife Region 2** Jeff Drongesen
- [ ] **Fish & Wildlife Region 3** Craig Weightman
- [ ] **Fish & Wildlife Region 4** Julie Vance
- [x] **Fish & Wildlife Region 5** Leslie Newton-Reed Habitat Conservation Program
- [ ] **Fish & Wildlife Region 6** Tiffany Ellis Habitat Conservation Program
- [ ] **Fish & Wildlife Region 6 I/M** Heidi Calvert Inyo/Mono, Habitat Conservation Program
- [ ] **Dept. of Fish & Wildlife M** William Paznokas Marine Region

Other Departments

- [ ] **California Department of Education** Lesley Taylor
- [x] **OES (Office of Emergency Services)** Monique Wilber
- [ ] **Food & Agriculture** Sandra Schubert Dept. of Food and Agriculture
- [ ] **Dept. of General Services** Cathy Buck Environmental Services Section
- [ ] **Housing & Comm. Dev.** CEQA Coordinator Housing Policy Division

Independent Commissions,Boards

- [ ] **Delta Protection Commission** Erik Vink
- [ ] **Delta Stewardship Council** Anthony Navasero
- [ ] **California Energy Commission** Eric Knight
- [x] **Native American Heritage Comm.** Debbie Treadway
- [x] **Public Utilities Commission** Supervisor
- [ ] **Santa Monica Bay Restoration** Guangyu Wang
- [ ] **State Lands Commission** Jennifer Deleong
- [ ] **Tahoe Regional Planning Agency (TRPA)** Cherry Jacques

Cal State Transportation Agency CalSTA

- [ ] **Caltrans - Division of Aeronautics** Philip Crimmins
- [ ] **Caltrans – Planning HQ LD-IGR** Christian Bushong
- [x] **California Highway Patrol** Suzann Ikeuchi Office of Special Projects

Dept. of Transportation

- [ ] **Caltrans, District 1** Rex Jackman
- [ ] **Caltrans, District 2** Marcelino Gonzalez
- [ ] **Caltrans, District 3** Susan Zanchi - North
- [ ] **Caltrans, District 4** Patricia Maurice
- [ ] **Caltrans, District 5** Larry Newland
- [ ] **Caltrans, District 6** Michael Navarro
- [x] **Caltrans, District 7** Dianna Watson
- [ ] **Caltrans, District 8** Mark Roberts
- [ ] **Caltrans, District 9** Gayle Rosander
- [ ] **Caltrans, District 10** Tom Dumas
- [ ] **Caltrans, District 11** Jacob Armstrong
- [ ] **Caltrans, District 12** Maureen El Harake

Cal EPA

Air Resources Board

- [ ] **Airport & Freight** Jack Wursten
- [ ] **Transportation Projects** Nesamani Kalandiyur
- [ ] **Industrial/Energy Projects** Mike Tollstrup
- [ ] **California Department of Resources, Recycling & Recovery** Kevin Taylor/Jeff Esquivel
- [ ] **State Water Resources Control Board** Regional Programs Unit Division of Financial Assistance
- [ ] **State Water Resources Control Board** Cindy Forbes – Asst Deputy Division of Drinking Water
- [x] **State Water Resources Control Board** **Div. Drinking Water #** 15
- [ ] **State Water Resources Control Board** Student Intern, 401 Water Quality Certification Unit Division of Water Quality
- [ ] **State Water Resouces Control Board** Phil Crader Division of Water Rights
- [ ] **Dept. of Toxic Substances Control Reg. #**_____ CEQA Tracking Center
- [ ] **Department of Pesticide Regulation** CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

- [ ] **RWQCB 1** Cathleen Hudson North Coast Region (1)
- [ ] **RWQCB 2** Environmental Document Coordinator San Francisco Bay Region (2)
- [ ] **RWQCB 3** Central Coast Region (3)
- [x] **RWQCB 4** Teresa Rodgers Los Angeles Region (4)
- [ ] **RWQCB 5S** Central Valley Region (5)
- [ ] **RWQCB 5F** Central Valley Region (5) Fresno Branch Office
- [ ] **RWQCB 5R** Central Valley Region (5) Redding Branch Office
- [ ] **RWQCB 6** Lahontan Region (6)
- [ ] **RWQCB 6V** Lahontan Region (6) Victorville Branch Office
- [ ] **RWQCB 7** Colorado River Basin Region (7)
- [ ] **RWQCB 8** Santa Ana Region (8)
- [ ] **RWQCB 9** San Diego Region (9)

- [ ] **Other** _____
- [ ] _____ Conservancy

Last Updated 5/22/18

DEPARTMENT OF TRANSPORTATION
DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0673
FAX (213) 897-1337
www.dot.ca.gov

Making Conservation a California Way of Life.

September 20, 2018

Ms. Kathleen King
City of Los Angeles, Dept. of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: 2159 Bay Street project
Notice of Preparation of Environmental Impact Report (NOP)
SCH # 2018081070
GTS # 07-LA-2018-01871-FL
Vic. LA/ 10/ PM 17.737

Dear Ms. King:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project includes approx. 202,954 square feet (sf) of creative office space, 16,000 sf of retail and restaurant space, and 3,235 sf of event and meeting space; and a total of 710 vehicle parking spaces within up to two levels of subterranean parking levels and one ground floor parking level.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. Please reference to The Governor's Office of Planning and Research (OPR) for more information: http://opr.ca.gov/ceqa/updates/guidelines/.

In the Initial Study dated August 2018, on page A-13 indicated that "pedestrian access would be provided via newly constructed sidewalks on Bay Street and Sacramento Street," and public transit service (bus stops & subway stations) are located within a half mile along nearby streets. Caltrans looks forward to review further analysis to be provided in the EIR.

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

As indicated in Initial Study, on page B-42, "the proposed project has the potential to result in an increase in daily and peak-hour traffic within the vicinity of the project site. In addition, construction of the project has the potential to affect the transportation system through the hauling of excavated materials and debris...", etc. Caltrans looks forward to review further analysis of this issue to be provided in the EIR, such as trip generation, trip distribution, and trip assignment estimates for this proposed project with regards to the local and regional road system. As well as, the analysis should include existing traffic, traffic generated by the project assigning to the State facilities, cumulative traffic generated from all specific planning developments in the area, and traffic growth other than from the project and developments.

Caltrans encourages the City to fully utilize the Transportation Demand Management (TDM) Program to reduce Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths, and achieve a high level of non-motorized travel and transit use. We also encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.

A discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. Any mitigation involving transit or Transportation Demand Management (TDM) is encouraged and should be justified to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online: http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf.

Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. For hauling of materials, a Traffic Management Plan (TMP) for construction vehicles may be needed and should be submitted to Caltrans for review. It is recommended that large size truck trips be limited to off-peak commute periods.

Storm water run-off is a sensitive issue for Los Angeles and Ventura Counties. Please be mindful of your need to discharge clean run-off water and it is not permitted to discharge onto State highway facilities.

If you have any questions or concerns regarding these comments, please contact project coordinator, Frances Lee at (213) 897-0673 or electronically at frances.lee@dot.ca.gov.

Sincerely,

MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL: September 19, 2018

Kathleen.king@lacity.org
Kathleen King
City of Los Angeles, Department of City Planning
221 N. Figueroa ST., Suite 1350
Los Angeles, CA 90012

Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the 2159 Bay Street Project (ENV-2017-625-EIR)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft Environmental Impact Report (EIR). Please send SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address shown in the letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files[1]. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

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

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional

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

perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment. The 2016 AQMP is available on SCAQMD's website at: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan.

The SCAQMD has also developed both regional and localized significance thresholds. SCAQMD staff requests that the lead agency compare the emission results to the recommended regional significance thresholds found here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf. In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

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

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

Mitigation Measures

In the event that the proposed project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the lead agency with identifying possible mitigation measures for the proposed project, including:

- Chapter 11- Mitigating the Impact of a Project, of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages available here: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

- SCAG's MMRP for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy available here: http://scagrtpscs.net/Documents/2016/peir/final/2016fPEIR_ExhibitB_MMRP.pdf
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

Alternatives

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

Permits

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

Data Sources

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

The SCAQMD staff is available to work with the lead agency to ensure that project air quality and health risk impacts are accurately evaluated and mitigated where feasible. Please contact Robert Dalbeck, Assistant Air Quality Specialist, at rdalbeck@aqmd.gov, if you have any questions regarding these comments.

Sincerely,

Daniel Garcia

Daniel Garcia
Program Supervisor
Planning, Rule Development & Area Sources

DG/RD
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Control Number

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Via Email and U.S. Mail

September 14, 2018

Kathleen King, Planning Assistant
City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
kathleen.king@lacity.org

Vincent Bertoni, Director
City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
vince.bertoni@lacity.org

Holly L. Wolcott, City Clerk
City of Los Angeles
Office of City Clerk
200 N. Spring Street, Room 360
Los Angeles, CA 90012
CityClerk@lacity.org

Re: **CEQA and Land Use Notice Request for the 2159 Bay Street Project by applicant Sacramento Street Property LP**

Dear Ms. King, Mr. Bertoni, and Ms. Wolcott:

I am writing on behalf of the Laborers International Union of North America, Local Union 300 and its members living in Los Angeles County and/or the City of Los Angeles ("LiUNA") regarding the 2159 Bay Street Project by applicant Sacramento Street Property LP including all actions referring or related to the development of a three-building creative office campus that would be comprised of an 8 story commercial high-rise building with up to 2 levels of subterranean parking, and two 2-story commercial buildings. The project would specifically include approximately 202,954 sf of creative office space, 16,000 sf of retail and restaurant space, and 3,235 sf of event and meeting space. located at 2136–2148 and 2159 E. Bay Street, and 2145–2161 E. Sacramento Street in the City of Los Angeles ("Project").

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

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.
- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act ("CEQA"), including, but not limited to:

- Notices of any public hearing held pursuant to CEQA.
- Notices of determination that an Environmental Impact Report ("EIR") is required for the Project, prepared pursuant to Public Resources Code Section 21080.4.
- Notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.
- Notices of preparation of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21092.
- Notices of availability of an EIR or a negative declaration for a project, prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations.
- Notices of approval and/or determination to carry out the Project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of approval or certification of any EIR or negative declaration, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of determination that the Project is exempt from CEQA, prepared pursuant to Public Resources Code section 21152 or any other provision of law.
- Notice of any Final EIR prepared pursuant to CEQA.
- Notice of determination, prepared pursuant to Public Resources Code Section 21108 or Section 21152.

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

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

Richard Drury
Daniel Charlier-Smith
Lozeau Drury LLP
410 12th Street, Suite 250
Oakland, CA 94607
richard@lozeaudrury.com
daniel@lozeaudrury.com

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

Sincerely,

Daniel Charlier-Smith
Paralegal
Lozeau | Drury LLP