DEPARTMENT OF CITY PLANNING

APPEAL RECOMMENDATION REPORT

City Planning Commission

Date: August 10, 2017
Time: After 8:30 a.m.
Place: Los Angeles City Hall
Council Chambers, Room 340
200 North Spring Street
Los Angeles, CA 90012

Public Hearing: Yes
Appeal Status: Further Appealable to City Council
Expiration Date: September 1, 2017

Case No.: VTT-74112-1A
CEQA No.: ENV-2013-2994-MND
Related Case: CPC-2013-2993-GPA-VZC-HD-DB-MCUP-SPR
Council No.: 14 - Huizar
Plan Area: Central City North
Specific Plan: None
Certified NC: Historic Cultural

Existing GPLU: Heavy Manufacturing
Existing Zone: M3-1-RIO

Applicant: Ben Brosseau, Camden USA, Inc.
Representative: Dale Goldsmith; Armbruster, Goldsmith & Delvac

Appellant: Yuval Bar-Zemer; Arts District Community Council Los Angeles

PROJECT LOCATION: 1525 E. Industrial Street, 1549 E. Industrial Street, 656 S. Alameda Street, 660 S. Alameda Street

PROPOSED PROJECT: The proposed project includes the demolition of an existing industrial building, loading dock, and freight truck/trailer storage area on the Project Site and the construction of a 336,304 square-foot mixed-use project on a 2.59 acre site with 344 live/work units, 7,458 square feet of leasing/amenity area, 24,774 square feet of creative office uses and resident production space, and 4,042 square feet of restaurant space. The proposed Project would have a maximum height of 85 feet and a total floor area of 336,304 square feet, resulting in a Floor Area Ratio (FAR) of 2.98:1. The Project would provide a total of 536 vehicle parking spaces and 394 bicycle parking spaces. The Applicant proposes to set aside 18 live/work units as Restricted Affordable Units for Very Low Income households.

APPEAL ACTION: Pursuant to Los Angeles Municipal Code (L.A.M.C.) Section 17.06, an appeal of the entire decision of the Advisory Agency's approval of Vesting Tentative Tract Map No. 74112 for the merger of two lots and the re-subdivision into one master/ground lot and 13 airspace lots.

RECOMMENDED ACTIONS:

1. **Find**, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2013-2994-MND ("Mitigated Negative Declaration"), and all comments received, with the imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; **find** the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; **find** the mitigation measures have been made enforceable conditions on the project; and **adopt** the Mitigated Negative Declaration and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration.

2. **Deny** the appeal of the Advisory Agency's approval of Vesting Tentative Tract Map No. 74112;

3. **Sustain** the decision of the Advisory Agency to approve Vesting Tentative Tract Map No. 74112;

4. **Adopt** the attached Revised Conditions and Findings of the Advisory Agency;

5. **Advise** the applicant that, pursuant to California State Public Resources Code Section 21081.6, the City shall monitor or require evidence that mitigation conditions are implemented and maintained throughout the life of the project and the City may require any necessary fees to cover the cost of such monitoring, and

6. **Advise** the applicant that pursuant to State Fish and Wildlife Code Section 711.4, a Fish and Wildlife Fee is now required to be submitted to the County Clerk prior to or concurrent with the Environmental Notice of Determination (NOD) filing.

VINCENT P. BERTONI, AICP
Advisory Agency

Shana Bonstin
Principal City Planner

Blake Lamb
Senior City Planner

Jennifer Caira
City Planner

Michael Sin
City Planning Associate

ADVICE TO PUBLIC: *The exact time this report **will** be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the *Commission Secretariat, Room 525, City Hall, 200 North Spring Street, Los Angeles, CA 90012* (Phone No. 213-978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent to the week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to these programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request not later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1300.

TABLE OF CONTENTS

Project Summary 1

Background A-1

Public Hearing A-2

Appeal Analysis A-3

Staff Conclusion and Recommendation A-6

Revised Conditions and Findings A-6

Maps:

Map 1 - Vicinity Map

Map 2 - Radius Map

Exhibits:

Exhibit A - Advisory Agency's Decision Letter and Tract Map

Exhibit B - Appeal Application

Exhibit C - ENV-2013-2994-MND and Mitigation Monitoring Program

Exhibit D - Project Consistency with Applicable Objectives and Policies of the Framework Element (Table 1)

PROJECT ANALYSIS

Project Summary

Vesting Tentative Tract Map No. 74112 was approved by the Advisory Agency on January 5, 2017, for the merger of two lots and re-subdivision into one master/ground lot and 13 airspace lots for the construction of the Proposed Project located at 1525 East Industrial Street (Exhibit A). The Vesting Tentative Tract Map approval was subsequently appealed by an aggrieved party (Exhibit B).

Background

The Proposed Project includes the demolition of an existing industrial building, loading dock, and freight truck/trailer storage area on the Project Site and the construction of a 336,304 square-foot mixed-use project on a 2.59 acre site with 344 live/work units, 7,458 square feet of leasing/amenity area, 24,774 square feet of creative office uses and resident production space, and 4,042 square feet of restaurant space. The proposed Project would have a maximum height of 85 feet and a total floor area of 336,304 square feet, resulting in a Floor Area Ratio (FAR) of 2.98:1. The Project would provide a total of 536 vehicle parking spaces and 394 bicycle parking spaces. The Applicant proposes to set aside 18 live/work units as Restricted Affordable Units for Very Low Income households.

In addition to the Vesting Tentative Tract Map application, the applicant is separately requesting entitlements for consideration by the City Planning Commission under related Case No. CPC-2013-2993-GPA-VZC-HD-DB-MCUP-SPR, which includes the following:

1) Pursuant to Charter Section 555 and Los Angeles Municipal Code (LAMC) Section 11.5.6, a General Plan Amendment to amend the Central City North Community Plan to re-designate the subject property from Heavy Manufacturing to Regional Commercial;

2) Pursuant to City Charter Section 558 and LAMC Section 12.32 Q, a Vesting Zone Change and Height District Change from M3-1-RIO to C2-2D-RIO, with a D limitation of a 3:1 FAR;

3) Pursuant to LAMC Section 12.22 A.25(g)(2), an On-Menu Density Bonus Incentive for a seven (7) percent reduction in required on-site residential open space;

4) Pursuant to LAMC Section 12.22 A.25(g)(3), an Off-Menu Density Bonus Incentive for a variable side yard setback for Building A of 0 to 10 feet, in lieu of 10 feet;

5) Pursuant to LAMC Section 12.24 W.1, a Master Conditional Use Permit for the sale and dispensing of alcoholic beverages for on-site consumption within three establishments; and

6) Pursuant to LAMC Section 16.05, a Site Plan Review for a development project that results in an increase of 344 residential live/work units.

The project site is currently comprised of two parcels located within the Central City North Community Plan Area. The site is bounded by Alameda Street to the west, Industrial Street to the south, and commercial and industrial buildings to the north and east, and includes the length of vacated Wholesale Street from Alameda Street to Mill Street. Approval of Vesting Tentative Tract Map No. 74112 would result in 112,843 square feet of lot area (2.59 acres) after street dedications.

The site's current zoning is M3-1-RIO with a General Plan Land Use designation of Heavy Manufacturing. The corresponding zone for Heavy Manufacturing is the M3 Zone. The M3-1 designation indicates that the project site is located in Height District 1, which does not specify a

building height limit but rather limits FAR on the site to 1.5:1. The RIO designation is for the City's River Improvement Overlay (RIO) supplemental use district, which provides for the preservation of rivers in Los Angeles by supporting local species and guiding urban design and access.

The site is currently developed with a vacant cold storage building, loading dock, and freight truck/trailer storage area. The building was initially constructed for the Union Ice Company circa 1904 and is not eligible as a historic resource. The M3 zone allows any industrial uses, including nuisance type uses 500 feet from any other zone, as well as enclosed C2 uses. The M3 zone does not allow any residential uses, hospitals, or schools. The site has been vacant recently since Union Ice Company declared bankruptcy.

The properties surrounding the project site include industrial, commercial/retail, office, restaurant, parking, and live/work uses. To the west of the project site, across Alameda Street, is the Los Angeles County Metropolitan Transportation Authority (Metro) Compressed Natural Gas (CNG) Fueling Station. Properties to the west are zoned PF-2D and M2-2D. Directly east of the project site, and east of Mill Street, are one- to two-story industrial, commercial/retail, office buildings and surface parking. To the immediate north of the project site, adjacent to Wholesale Street, are one-story industrial and commercial buildings. To the south of the project site, across Industrial Street, are one- to two-story industrial, commercial/retail, office buildings, and surface parking. Properties to the north, south, and east are zoned M3-1-RIO.

The Department of City Planning first circulated Mitigated Negative Declaration ENV-2013-2994-MND for public review on June 16, 2016 through July 16, 2016. The MND was republished on July 21, 2016 through August 22, 2016 in order to include reference to the historic assessment and a revised air quality assessment (Exhibit C). Upon approval of Vesting Tentative Tract No. 74112 on January 5, 2017, the Advisory Agency certified that Mitigated Negative Declaration No. ENV-2013-2994-MND reflects the independent judgment of the lead agency and determined that this project would not have a significant effect upon the environment provided the potential impacts are mitigated to a less than significant level through implementation of the adopted mitigation measures, which are reflected in Condition No. 17 of the Tract's approval.

Public Hearing and Public Correspondence

An initial Public Hearing was held by the Deputy Advisory Agency for Case No. VTT-74112 on December 14, 2016, at approximately 10:20 a.m., at Los Angeles City Hall. Two persons (Yuval Bar-Zemer and John Given, Law Offices of John P. Given) spoke in opposition to the proposal, while the applicant's representative (Dale Goldsmith; Armbruster, Goldsmith & Delvac) spoke in favor of the proposal.

At the conclusion of the hearing, the Deputy Advisory Agency (DAA) indicated that the case would be held briefly under advisement to allow time for the review of a letter submitted shortly before the hearing.

On January 5, 2017, the Advisory Agency approved Vesting Tentative Tract Map No. 74112 for the merger of two lots and the re-subdivision into one master/ground lot and 13 airspace lots. On January 17, 2017, the Arts District Community Council Los Angeles ("ADCCLA"), Yuval Bar-Zemer, appealed the decision.

APPEAL ANALYSIS

The subject Vesting Tentative Tract (VTT) map approval received one appeal from the Arts District Community Council Los Angeles (ADCCLA) and Yuval Bar-Zemer. The following statements have been compiled from the submitted appeal. The appeal in its entirety has been attached herein for reference (Exhibit B).

1. **The Project Does Not Comply with Existing General Plan and Zoning Requirements**

Appellant

The appellant provides several arguments, summarized below, stating that the Advisory Agency's approval of the VTT should be overturned because the proposed project does not comply with the existing Central City North Community Plan and the zoning requirements of the M3-1-RIO Zone:

- The Advisory Agency does not have the authority to approve a VTT map that fails to comply with applicable land use standards (i.e., the General Plan land use designation and zoning requirements).
- The Advisory Agency's approval of the VTT for a project that converts parcels to a zone and land use designation inconsistent with the General Plan violates the fundamental purpose of the Subdivision Map Act.
- The Advisory Agency's approval of the VTT violates the Subdivision Map Act because the VTT is inconsistent with the General Plan.
- The Subdivision Map Act findings are inaccurate and do not support approval of the VTT because the project is inconsistent with the General Plan.

Staff Response:

The approval of the VTT is expressly conditioned upon the approval of the proposed General Plan Amendment and Vesting Zone and Height District Change under consideration by the City Planning Commission as part of a related case (CPC-2013-2993-GPA-VZC-HD-DB-MCUP-SPR). Approval of the related entitlements would modify the project site's land use designation and zoning such that the proposed project would be consistent with the General Plan and applicable land use standards. If the related case were approved, the subject property would be designated for Regional Commercial land uses and zoned C2-2D-RIO, with a D limitation of a 3:1 FAR. Per the Central City North Community Plan Map, the C2 Zone is a corresponding zone for Regional Commercial land uses. The proposed live/work, creative office, and restaurant uses are all permitted within the C2 Zone. Therefore, the project will fully comply with applicable land use standards and be consistent with the General Plan.

As noted, the Advisory Agency's action constitutes *conditional* approval of the VTT. Conditions of approval are requirements placed on discretionary projects by the decision maker, without which the project would not be in conformance with applicable land use standards. In this instance, all of the required consistency findings for approving VTT-74112 could only be made in the affirmative because of the inclusion of Condition No. 15, which requires the approval of the General Plan Amendment and Vesting Zone and Height District Change prior to the recordation of the final map. It is noted that if the related entitlements were denied, then the subject VTT would be invalidated because the conditions of approval would not be met, and the applicant would not be able to record the final map. Approvals of tract maps are contingent on zoning consistency, and thus the approval of the subject VTT is

contingent upon separate approval of the General Plan Amendment and Vesting Zone and Height District Change. Approval of the related entitlements will confer the Subdivision Map Act findings of consistency for the tract map, which is why the VTT is conditioned thusly.

Furthermore, the attached Table 1 (Exhibit D) demonstrates the project's consistency with applicable objectives and policies of the General Plan (Framework Element).

2. **Requested Project Entitlements Are Impermissible or Unlawful**

Appellant:

The appellant states that the requested General Plan Amendment and Zone Change are impermissible or unlawful because the required City Charter findings cannot be made in the affirmative. The appellant further states that, because the requested entitlements are impermissible and unavailable, the project is inconsistent with the General Plan and that the Subdivision Map Act findings are inaccurate and do not support approval of the VTT. The appellant also states that the Zoning Administrator's Adjustment is not an available entitlement because it violates the City Charter.

Staff Response:

The requested General Plan Amendment and Vesting Zone and Height District Change are in fact available entitlements because all of the required City Charter findings can be made in the affirmative (see "Findings" in the Department of City Planning Recommendation Report for CPC-2013-2993-GPA-VZC-HD-DB-MCUP-SPR, August 10, 2017, City Planning Commission date). The requested entitlements will be considered by the City Planning Commission separately from the VTT as a related case.

The applicant is no longer seeking a Zoning Administrator's Adjustment to allow a variable side yard setback of 0 to 10 feet, in lieu of 10 feet, and is instead requesting an Off-Menu Density Bonus Incentive for the same reduction. No physical changes to the project are proposed. All of the required findings for the Density Bonus Incentive have been made in the affirmative as part of the related case (CPC-2013-2993-GPA-VZC-HD-DB-MCUP-SPR).

3. **An Environmental Impact Report (EIR) is Required**

Appellant:

The appellant states that, because the project is incompatible and inconsistent with existing land use requirements, there is a fair argument that the project would result in significant land use impacts and therefore an EIR is required. The appellant further states that there is no mitigation available to address these impacts because the requested General Plan amendment is not an available entitlement. The appellant also states that the MND fails to consider the potentially significant impacts of the spot zone that the project would create.

Staff Response:

The appellant states that there are unmitigatable land use impacts because the site's current zoning and land use designation do not allow for the proposed uses. However, the appellant ignores the project entitlement requests which, if granted, will modify the site's land use designation and zone such that there will be consistency between zoning and the proposed uses. The L.A. CEQA Thresholds Guide expressly recognizes that City approval of a General Plan amendment or zone change will ensure that a project will not result in a significant impact

with respect to land use consistency. Moreover, the VTT is expressly conditioned upon the approval of the proposed General Plan amendment and zone change.

The requested entitlements are consistent with the applicable elements of the General Plan; the attached Table 1 (Exhibit D) demonstrates the project's consistency with applicable objectives and policies of the Framework Element.

As noted, the General Plan Amendment and Vesting Zone and Height District Change are in fact available entitlements because all of the required City Charter findings can be made in the affirmative (see "Findings" in the Department of City Planning Recommendation Report for CPC-2013-2993-GPA-VZC-HD-DB-MCUP-SPR, August 10, 2017, City Planning Commission date). With respect to spot zoning, the term refers to situations where a city or county singles out a particular parcel for more restrictive zoning than other properties in the vicinity (for example, an island of single family zoning in a sea of commercial zones). Nothing prohibits the City from approving the zone change.

4. **The City Violated Due Process Rights and Did Not Appropriately Consider Public Comments**

Appellant:

The appellant states the following:

> Appellants object to public hearing comments made both by the Applicant and by a member of the DAA [Deputy Advisory Agency] panel suggesting that DAA review during the VTT approval process is merely technical and consideration of the numerous objections to the VTT application raised by members of the public should be deferred to the City Planning Commission to be heard on appeal when it considers the related development application. These concerns, especially those made by a member of the DAA panel, implicate serious due process concerns ... The DAA panel member's comment that because there is a separate and later legislative process in place to consider land use issues that the Subdivision Map Act approval hearing is merely for technical map considerations is in error, and indicates that the panel members did not provide an impartial hearing.

Staff Response:

All of the comments provided at the VTT hearing have been considered by the Advisory Agency. At the public hearing, the Advisory Agency merely recommended that concerns specific to the General Plan Amendment and Vesting Zone and Height District Change be directed to the respective Hearing Officer and decision-maker for those specific entitlements. The Advisory Agency is a separate and different decision-maker from the City Planning Commission, which has jurisdiction over the General Plan Amendment and Vesting Zone and Height District Change recommendation.

Two persons (Yuval Bar-Zemer and John Given, Law Offices of John P. Given) spoke in opposition to the proposal, while the applicant's representative (Dale Goldsmith; Armbruster, Goldsmith & Delvac) spoke in favor of the proposal. The public hearing on the VTT lasted for approximately 45 minutes, and there was no time limit for the speakers.

Staff Recommendation

Based on the aforementioned information, the Advisory Agency did not err or abuse their authority. As conditioned, the proposed map is consistent with the State's Subdivision Map Act, the General Plan, and is consistent with the adopted Central City North Community Plan. In addition, the environmental document properly analyzed the project's potential environmental impacts and all significant environmental impacts were mitigated to less than significant levels. Therefore, staff recommends that the appeal be denied and decision of the Advisory Agency be **sustained**.

Revised Conditions and Findings

Subsequent to the approval of Case No. VTT-74112, the applicant modified the requested entitlements for the related case, which included the removal of the Director's Determination request for reduced open space and the Zoning Administrator's Adjustment request for a reduced side yard ("MSC" and "ZAA" suffixes, respectively). The applicant has chosen instead to request On- and Off-Menu Density Bonus incentives ("DB") for the same reductions. No physical changes to the project were proposed.

As such, Planning Staff recommends that the City Planning Commission modify the following conditions of approval of the VTT-74112 Letter of Determination, dated January 5, 2017, in order to reflect the current case number:

7b. Provide a copy of CPC case CPC-2013-2993-GPA-VZC-HD-DB-MCUP-SPR ~~CPC-2013-2993-GPA-ZC-HD-MCUP-ZAA-SPR~~. Show compliance with all the conditions/ requirements of the CPC case as applicable.

15. That prior to the issuance of the building permit or the recordation of the final map, a copy of Case No. CPC-2013-2993-GPA-VZC-HD-DB-MCUP-SPR ~~CPC-2013-2993-GPA-VZC-HD-MCUP-ZAA-MSC-SPR~~ shall be submitted to the satisfaction of the Advisory Agency. In the event that Case No. CPC-2013-2993-GPA-VZC-HD-DB-MCUP-SPR ~~CPC-2013-2993-GPA-VZC-HD-MCUP-ZAA-MSC-SPR~~ is not approved, the subdivider shall submit a tract modification.

Planning Staff also recommends that the City Planning Commission adopt the following revised findings for Case No. VTT-74112, which reflect the change in requested entitlements:

FINDINGS OF FACT (SUBDIVISION MAP ACT)

In connection with the approval of Vesting Tentative Tract No. 74112, the Advisory Agency of the City of Los Angeles, pursuant to Sections 66473.1, 66474.60, .61 and .63 of the State of California Government Code (the Subdivision Map Act), makes the prescribed findings as follows:

(a) THE PROPOSED MAP IS CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

The adopted Central City North Plan designates the subject property for heavy manufacturing land use with the corresponding zone of M3. The property contains approximately 2.59 net acres (112,842 net square feet) after required dedication and is presently zoned M3-1-RIO. The proposed 14-lot airspace subdivision is allowable under the current adopted zone and the land use designation. The project site is within the River Improvement Overlay (RIO) District.

Related Case No. CPC-2013-2993-GPA-VZC-HD-DB-MCUP-SPR includes a general plan amendment to change the land use designation from Heavy Industrial to Regional Commercial, a vesting zone change / height district change from M3-1-RIO (Heavy Manufacturing) to C2-2D-RIO (Commercial). The requested Community Commercial land use correlated C2 Zone would allow the proposed residential and commercial development on the property. The tract map approval is conditioned on the approval of the General Plan Amendment and Zone Change / Height District Change (Condition No. 15).

Residential parking will be provided as required by the LAMC. The project will provide 397 resident parking spaces and 80 guest parking spaces for the 344 live-work apartment units.

The project site is located within the Los Angeles State Enterprise zone. Per LAMC 12.21-A.4(x)(3), areas within any Enterprise Zone only need to provide two parking spaces for every 1,000 square feet of commercial space. Based on this requirement, the 29,544 square foot site is required to provide 59 commercial parking spaces.

The project will include 391 on-site bicycle parking spaces, meeting requirements of the Bicycle Ordinance (Ordinance No. 182,386). The live-work units require 379 bicycle parking spaces, including 35 short-term and 344 long-term spaces. The commercial area requires 12 bicycle parking spaces, including 5 short-term and 7 long-term spaces.

Therefore, the proposed map will be consistent with the applicable General Plan upon approval of the General Plan Amendment and the Zone Change.

(b) THE DESIGN OR IMPROVEMENT OF THE PROPOSED SUBDIVISION IS CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

The Bureau of Engineering has reviewed the proposed subdivision and found the subdivision layout generally satisfactory and that there are existing sewers in the streets adjoining the subdivision. As a condition of approval, the subdivider is required to make dedications and improvements on Industrial Street, Alameda Street and Mill Street in order to meet current street standards. The Bureau of Street Lighting has also reviewed the proposed subdivision and has conditioned the subdivision approval to construct new street lights on Industrial Street, Alameda Street and Mill Street in order to meet current street lighting standards. This tract will connect to the public sewer system and will not result in violation of the California Water Code. The Bureau of Sanitation reviewed the sewer/storm drain lines serving the proposed subdivision and found no potential problems to their structures or potential maintenance problems.

Therefore, as conditioned, the proposed tract map is consistent with the intent and purpose of the applicable General and Specific Plans.

(c) THE SITE IS PHYSICALLY SUITABLE FOR THE TYPE OF DEVELOPMENT.

The site is level and is not located in a slope stability study area, high erosion hazard area, or a fault-rupture study zone. The Department of Building and Safety, Grading Division, has tentatively approved the tract map without conditions.

The site is not subject to the Flood Hazard Specific Plan (Ordinance No. 172081, effective July 3, 1998) for floodways, floodplains, mud prone areas, coastal high-

hazard and flood-related erosion hazard areas. This plan qualifies property owners for greater coverage limits and generally lower flood insurance premium rates.

A tree letter dated February 12, 2016, certified that there are no protected trees on the project site.

The project engineer has certified that the subject site is not located in a flood hazard, a hillside, or a mud-prone area. However, the project is located in a Methane Buffer Zone. Prior to the issuance of a building permit, a qualified engineer will be required to investigate and design a methane mitigation system in compliance with the Department of Building and Safety Methane Mitigation Standards for the appropriate Site Design Level, which will prevent or retard potential methane gas seepage into the building.

(d) THE SITE IS PHYSICALLY SUITABLE FOR THE PROPOSED DENSITY OF DEVELOPMENT.

The approximately 2.59 acre site is currently zoned M3-1-RIO. The proposed map includes an accompanying request for a general plan amendment to change the Central City North land use designation from Heavy Manufacturing to Regional Commercial, a vesting zone change / height district change from M3-1-RIO (Heavy Manufacturing) to C2-2D-RIO (Commercial), On- and Off-Menu Density Bonus Incentives for reduced open space and reduced side yard setbacks respectively, a master conditional use permit for the sale of alcohol for on-site restaurant consumption, and an approval of Site Plan Review findings (Case No. CPC-2013-2993-GPA-VZC-HD-DB-MCUP-SPR). The current plan designation of Heavy Manufacturing and the M3-1-RIO Zone would not allow residential and commercial uses on the site. The land use designation change and zone change would allow the C2 Zone to be developed at the R5 density which is 200 square feet of lot area per dwelling unit. The proposed 344 dwelling units is consistent with R5 density.

The Height District Change from Height District No. 1 to Height District No. 2D would allow an increase in the Floor Area Ratio (FAR) from 1.5:1 to 6:1. Although Height District No. 2 allows an FAR of 6:1, the D limitation reduces the maximum FAR to 3:1. The project will be built at or less than 2.98:1 FAR. This would allow for a mix of commercial and residential uses as permitted by LAMC Section 12.22 A.18(a).

The project site is currently served by two MTA Rapid Bus Lines, including lines 720 and 760, and five MTA Local Bus Lines, including lines 18, 28, 53, 60 and 62. These lines provide connections to the downtown subway stations, which include Pershing Square and 7th Street/Metro Center. Additionally, the Greyhound Bus Terminal is located one block south of the project site on 7th Street, which provides inter-city bus services to various locations outside of the Los Angeles area.

The project is also served by the Metro Gold Line rail system located at the Little Tokyo/Arts District station near 1st Street and Alameda Street. The Metro Gold Line offers service to East Los Angeles to the east and Pasadena to the northeast. The Metro Gold Line connects to Union Station, providing access to Metrolink, the Metro Silver Bus Line, and Metro Rail Red and Purple Lines.

(e) THE DESIGN OF THE SUBDIVISION OR THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SUBSTANTIAL ENVIRONMENTAL DAMAGE OR SUBSTANTIALLY AND AVOIDABLY INJURE FISH OR WILDLIFE OR THEIR HABITAT.

The Deputy Advisory Agency certified that Mitigated Negative Declaration No. ENV-2013-2994-MND reflects the independent judgment of the lead agency and determined that this project would not have a significant effect upon the environment provided that the potential impacts identified above are mitigated to a less than significant level through implementation of **Conditions Nos. 17 and 18** of the Tract's approval.

The Initial Study, prepared for the project by Parker Environmental Consultants (published on July 18, 2016), identifies potential adverse impact on fish or wildlife resources as far as earth, air, and plant life are concerned. However, measures are required as part of this approval, which will mitigate the above mentioned impacts to a less than significant level. Furthermore, the project site, as well as the surrounding area is presently developed with structures and does not provide a natural habitat for either fish or wildlife.

Any demolition, grading, and construction will be conducted per the requirements of the Los Angeles Municipal Code and associated permits needed to perform such work. These permits also restrict work hours to mitigate noise pollution.

(f) THE DESIGN OF THE SUBDIVISION OR TYPE OF IMPROVEMENTS IS NOT LIKELY TO CAUSE SERIOUS PUBLIC HEALTH PROBLEMS.

There appears to be no potential public health problems caused by the design or improvement of the proposed subdivision. The development is required to be connected to the City's sanitary sewer system, where the sewage will be directed to the LA Hyperion Treatment Plant, which has been upgraded to meet Statewide ocean discharge standards. The Bureau of Engineering has reported that the proposed subdivision does not violate the existing California Water Code because the subdivision will be connected to the public sewer system and will have only a minor incremental impact on the quality of the effluent from the Hyperion Treatment Plant.

(g) THE DESIGN OF THE SUBDIVISION OR THE TYPE OF IMPROVEMENTS WILL NOT CONFLICT WITH EASEMENTS, ACQUIRED BY THE PUBLIC AT LARGE, FOR ACCESS THROUGH OR USE OF PROPERTY WITHIN THE PROPOSED SUBDIVISION.

There are no recorded instruments identifying easements encumbering the project site for the purpose of providing public access. The project site contains legally recorded lots identified by the Assessor Parcel Record. The site is surrounded by private and public properties that adjoin improved public streets and sidewalks designed and improved for the specific purpose of providing public access throughout the area. The project site does not adjoin or provide access to a public resource, natural habitat, Public Park or any officially recognized public recreation area. Therefore, the design of the subdivision and the proposed improvements would not conflict with easements acquired by the public at large for access through or use of property within the proposed subdivision.

(h) THE DESIGN OF THE PROPOSED SUBDIVISION SHALL PROVIDE, TO THE EXTENT FEASIBLE, FOR FUTURE PASSIVE OR NATURAL HEATING OR COOLING OPPORTUNITIES IN THE SUBDIVISION. (REF. SECTION 66473.1)

In assessing the feasibility of passive or natural heating or cooling opportunities in the proposed subdivision design, the applicant has prepared and submitted

materials which consider the local climate, contours, configuration of the parcel(s) to be subdivided and other design and improvement requirements.

Providing for passive or natural heating or cooling opportunities will not result in reducing allowable densities or the percentage of a lot which may be occupied by a building or structure under applicable planning and zoning in effect at the time the tentative map was filed.

The lot layout of the subdivision has taken into consideration the maximizing of the north/south orientation.

The topography of the site has been considered in the maximization of passive or natural heating and cooling opportunities.

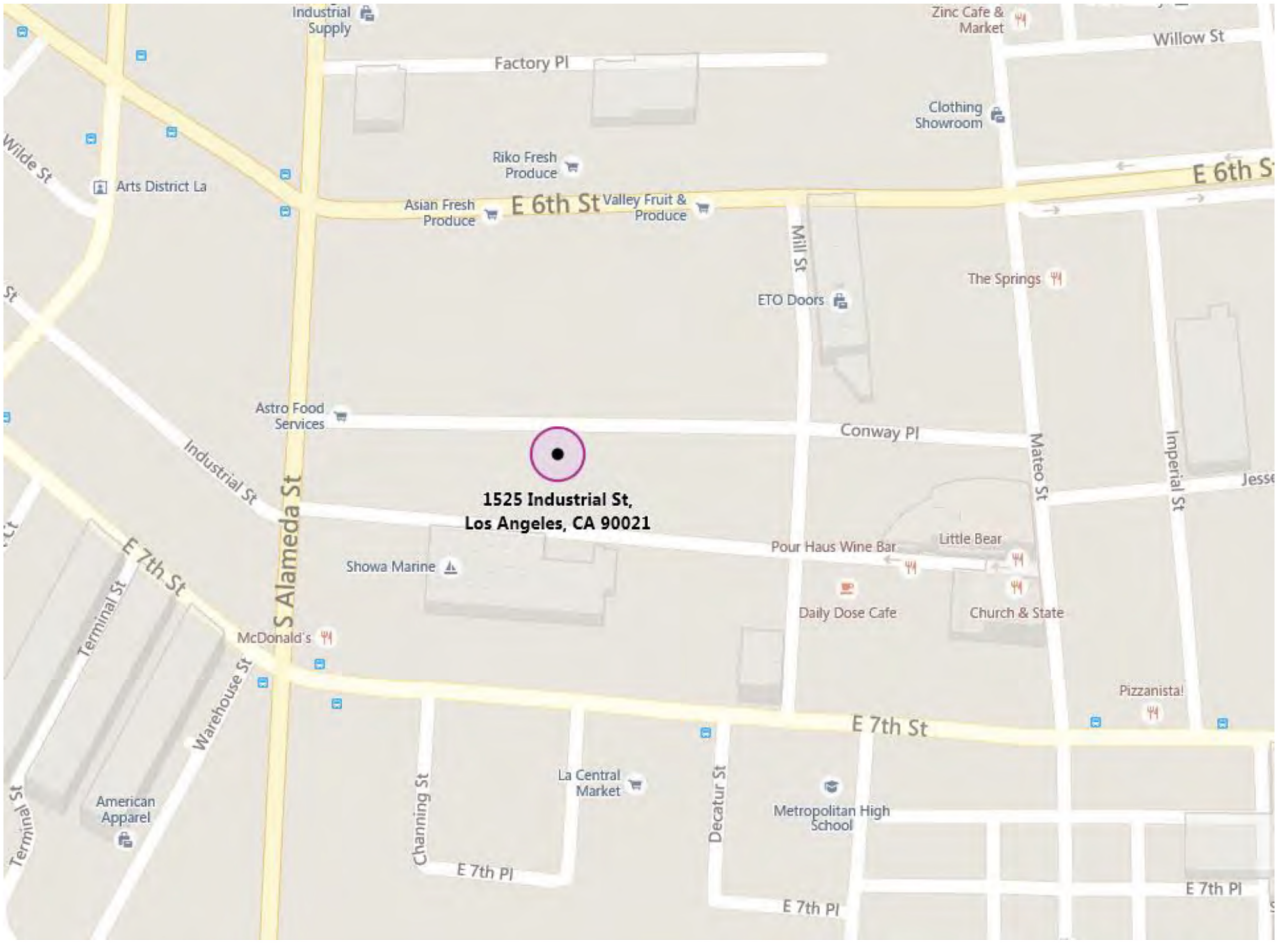
In addition, prior to obtaining a building permit, the subdivider shall consider building construction techniques, such as overhanging eaves, location of windows, insulation, exhaust fans; planting of trees for shade purposes and the height of the buildings on the site in relation to adjacent development.

These findings shall apply to both the tentative and final maps for Tract No. 74112.

MAPS

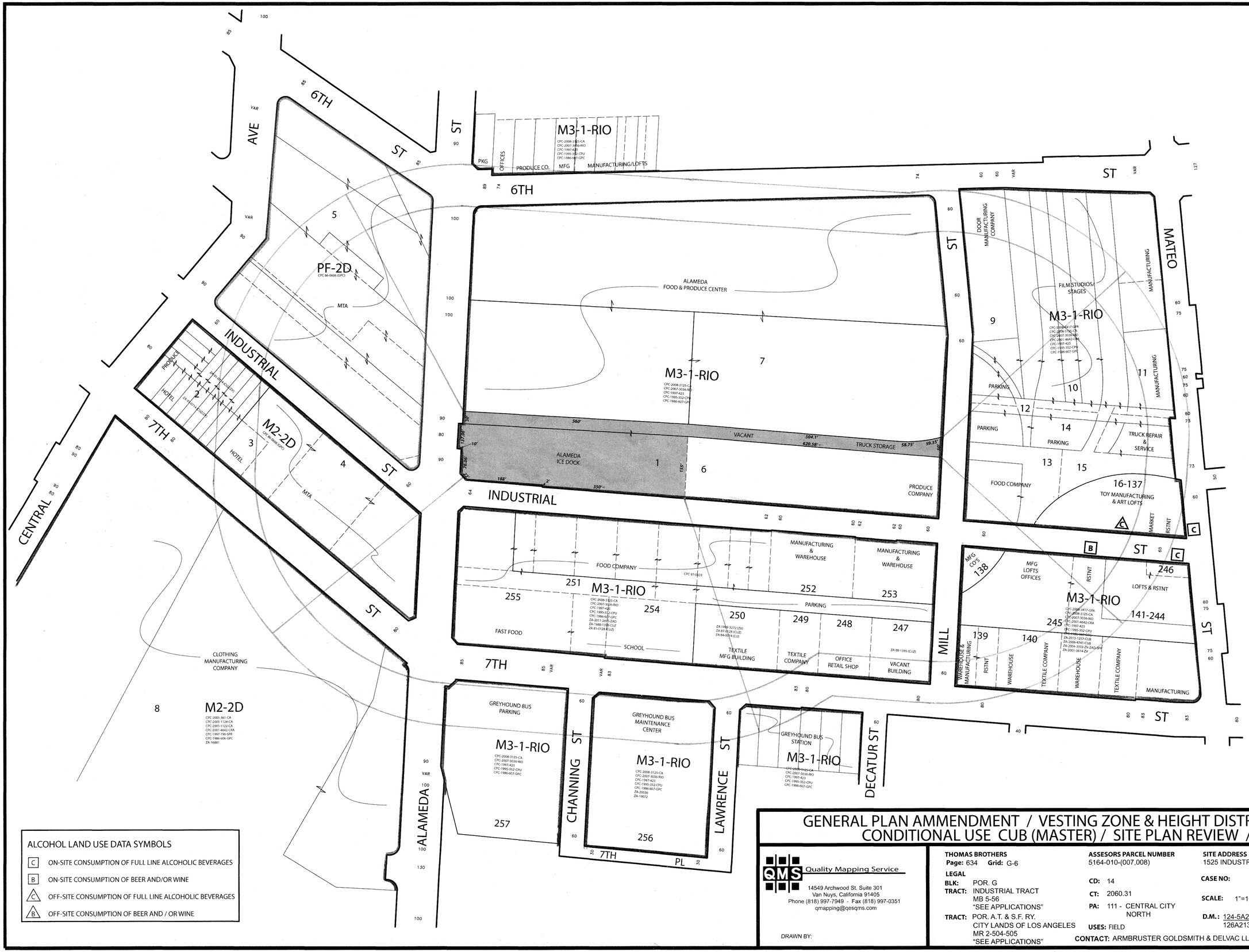
Vicinity Map
Radius Map

Vicinity Map



Address: 1525 E. INDUSTRIAL STREET, LOS ANGELES

QMS 15-159



ALCOHOL LAND USE DATA SYMBOLS

- C — ON-SITE CONSUMPTION OF FULL LINE ALCOHOLIC BEVERAGES
- B — ON-SITE CONSUMPTION OF BEER AND/OR WINE
- C — OFF-SITE CONSUMPTION OF FULL LINE ALCOHOLIC BEVERAGES
- B — OFF-SITE CONSUMPTION OF BEER AND / OR WINE

GENERAL PLAN AMMENDMENT / VESTING ZONE & HEIGHT DISTRICT CHANGE CONDITIONAL USE CUB (MASTER) / SITE PLAN REVIEW / ZAA

QMS Quality Mapping Service
14549 Archwood St. Suite 301
Van Nuys, California 91405
Phone (818) 997-7949 - Fax (818) 997-0351
qmapping@qesqms.com

DRAWN BY:

THOMAS BROTHERS
Page: 634 **Grid:** G-6

LEGAL
BLK: POR. G
TRACT: INDUSTRIAL TRACT
MB 5-56
"SEE APPLICATIONS"
TRACT: POR. A.T. & S.F. RY.
CITY LANDS OF LOS ANGELES
MR 2-504-505
"SEE APPLICATIONS"

ASSESSORS PARCEL NUMBER
5164-010-(007,008)

CD: 14

CT: 2060.31

PA: 111 - CENTRAL CITY NORTH

USES: FIELD

SITE ADDRESS
1525 INDUSTRIAL ST

CASE NO:

SCALE: 1"=100'

D.M.: 124-5A215, 124-5A213, 124-5A217, 126A213, 126A215, 126A217

CONTACT: ARMBRUSTER GOLDSMITH & DELVAC LLP **PHONE:** 310-254-9052

DATE: 04-29-16
Update:

NET AC: 2.68+/-

NORTH

QMS:16-160

EXHIBIT A

Advisory Agency's Decision
Letter and Tract Map

DEPARTMENT OF
CITY PLANNING

CITY PLANNING COMMISSION

DAVID H. J. AMBROZ
PRESIDENT

RENEE DAKE WILSON
VICE-PRESIDENT

ROBERT L. AHN
CAROLINE CHOE
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JOHN W. MACK
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http://planning.lacity.org

Decision Date: January 05, 2017

Last Day to Appeal: January 17, 2017

Ben Brosseau (O)
Camden USA, Inc.
15303 Ventura Blvd, Suite 605
Sherman Oaks, CA 91403

Dale Goldsmith (R)
Armbruster, Goldsmith & Delvac
12100 Wilshire Blvd, Suite 1600
Los Angeles, CA 90025

RE: Vesting Tentative Tract No. VTT-74112
Related Case: CPC-2013-2993-GPA-VZC-HD-MCUP-ZAA-MSC-SPR
1525 East Industrial Street
Central City North Planning Area
Zone: M3-1-RIO
District Map: 124 5A 215
Council District: 14
CEQA No.: ENV-2013-2994-MND
Legal Description: Lot FR G, Industrial Tract

In accordance with provisions of Section 17.03 of the Los Angeles Municipal Code (LAMC), the Advisory Agency adopted (Mitigated) Negative Declaration ENV-2013-2994-MND as the environmental clearance, adopted the Mitigation Monitoring Program, and approved Vesting Tentative Tract No. 74112 composed of 14 lots (one master ground lot and 13 airspace lots), located at 1525 East Industrial Street for a maximum **344 live-work units and 29,544 square feet of commercial space,** as shown on map stamp-dated May 6, 2016 in the Central City North Community Plan. (Verification should be obtained from the Department of Building and Safety which will legally interpret the Zoning Code as it applies to this particular property.) The Advisory Agency's approval is subject to the following conditions:

NOTE on clearing conditions: When two or more **agencies** must clear a condition, subdivider should follow the sequence indicated in the condition. For the benefit of the applicant, subdivider shall maintain record of all conditions cleared, including all material supporting clearances and be prepared to present copies of the clearances to each reviewing agency as may be required by its staff at the time of its review.

BUREAU OF ENGINEERING - SPECIFIC CONDITIONS

1. That a one-foot to 3-foot variable width strip of land be dedicated along Industrial Street adjoining the tract to complete a 33-foot wide half right-of-way in accordance with **Collector Street** Standards of LA Mobility Plan and additional 15-foot by 15-foot property line cut corner be dedicated at the intersection with Alameda Street. That the above cut corner dedication shall be limited to a height of 20 feet measured from the finished sidewalk surface.

2. That a 10-foot wide strip of land be dedicated along Alameda Street adjoining the tract to complete a 50-foot wide half right-of-way in accordance with **Avenue I** of LA Mobility Plan.

3. That a 3-foot wide strip of land be dedicated along Mill Street adjoining the tract to complete a 33-foot wide half right-of-way in accordance with **Collector Street** Standards of LA Mobility Plan.

4. That the subdivider make a request to the Central District Office of the Bureau of Engineering to determine the capacity of existing sewers in this area.

5. That a set of drawings for airspace lots be submitted to the City Engineer showing the following:

    a. Plan view at different elevations.
    b. Isometric views.
    c. Elevation views.
    d. Section cuts at all locations where air space lot boundaries change.

6. That the owners of the property record an agreement satisfactory to the City Engineer stating that they will grant the necessary private easements for ingress and egress purposes to serve proposed airspace lots to use upon the sale of the respective lots and they will maintain the private easements free and clear of obstructions and in safe conditions for use at all times.

DEPARTMENT OF BUILDING AND SAFETY, ZONING DIVISION

7. That prior to recordation of the final map, the Department of Building and Safety, Zoning Division shall certify that no Building or Zoning Code violations exist on the subject site. In addition, the following items shall be satisfied:

    a. Obtain permits for the demolition or removal of all existing structures on the site. Accessory structures and uses are not permitted to remain on lots without a main structure or use. Provide copies of the demolition permits and signed inspection cards to show completion of the demolition work.

    b. Provide a copy of CPC case CPC-2013-2993-GPA-ZC-HD-MCUP-ZAA-SPR. Show compliance with all the conditions/requirements of the CPC case as applicable.

c. Provide a copy of the case PMEX-4036. Show compliance with all the conditions/requirements of the case as applicable.

d. Zone Change must be recorded prior to obtaining Zoning clearance.

e. Show all street dedication(s) as required by Bureau of Engineering and provide net lot area after all dedication. "Area" requirements shall be re-checked as per net lot area after street/alley dedication. Front, side and rear yard requirements shall be required to comply with current code as measured from new property lines after dedication(s).

f. The submitted map does not comply with the maximum density (400 s.f. of lot area/dwelling unit) requirement for the proposed C2 Zone. Revise the map to show compliance with the above requirement based on the lot area after required street dedication is taken or obtain approval from the Department of City Planning.

g. Provide and record a Covenant and Agreement (affidavit) regarding Maintenance of Building on Air Space Lots. Provide Metes and Bounds to establish and identify the boundaries of the parcel with the correct legal description.

Notes:

This property is located in River Improvement Overlay District, ZI-2358.

This property is located in Transit Priority Area in the City of Los Angeles, ZI-2452.

This property is located in a Methane Buffer Zone.

The proposed building plans have not been checked for and shall comply with Building and Zoning Code requirements. With the exception of revised health or safety standards, the subdivider shall have a vested right to proceed with the proposed development in substantial compliance with the ordinances, policies, and standards in effect at the time the subdivision application was deemed complete. Plan check will be required before any construction, occupancy or change of use.

If the proposed development does not comply with the current Zoning Code, all zoning violations shall be indicated on the Map.

An appointment is required for the issuance of a clearance letter from the Department of Building and Safety. The applicant is asked to contact John Francia at (213) 482-0010 to schedule an appointment.

DEPARTMENT OF TRANSPORTATION

8. That the project be subject to any recommendations from the Department of Transportation.

FIRE DEPARTMENT

9. That prior to the recordation of the final map, a suitable arrangement shall be made satisfactory to the Fire Department, binding the subdivider and all successors to the following:

   a. Submittal of plot plans for Fire Department review and approval prior to recordation of Tract Map Action.

   b. Access for Fire Department apparatus and personnel to and into all structures shall be required.

   c. The entrance to a Residence lobby must be within 50 feet of the desired street address curb face.

   d. Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units.

   e. The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

   f. No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

   g. Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

   h. The width of private roadways for general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky.

   i. Fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

   j. Building designs for multi-storied residential buildings shall incorporate at least one access stairwell off the main lobby of the building; But, in no case greater than 150ft horizontal travel distance from the edge of the public street, private street or Fire Lane. This stairwell shall extend unto the roof.

   k. Entrance to the main lobby shall be located off the address side of the building.

   l. Any required Fire Annunciator panel or Fire Control Room shall be located

within 50ft visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department.

m. Where rescue window access is required, provide conditions and improvements necessary to meet accessibility standards as determined by the Los Angeles Fire Department.

n. Policy Exception – L.A.M.C. 57.09.03.B Exception:

(1) When this exception is applied to a fully fire sprinklered residential building equipped with a wet standpipe outlet inside an exit stairway with at least a 2 hour rating the distance from the wet standpipe outlet in the stairway to the entry door of any dwelling unit or guest room shall not exceed 150 feet of horizontal travel AND the distance from the edge of the roadway of an improved street or approved fire lane to the door into the same exit stairway directly from outside the building shall not exceed 150 feet of horizontal travel.

(2) It is the intent of this policy that in no case will the maximum travel distance exceed 150 feet inside the structure and 150 feet outside the structure. The term "horizontal travel" refers to the actual path of travel to be taken by a person responding to an emergency in the building.

(3) This policy does not apply to single-family dwellings or to non-residential buildings.

o. The Fire Department may require additional roof access via parapet access roof ladders where buildings exceed 28 feet in height, and when overhead wires or other obstructions block aerial ladder access.

p. Adequate public and private fire hydrants shall be required.

q. Each standpipe in a new high-rise building shall be provided with two remotely located FDC's for each zone in compliance with NFPA 14-2013, Section 7.12.2.

r. Recently, the Los Angeles Fire Department (LAFD) modified Fire Prevention Bureau (FPB) Requirement 10. Helicopter landing pads are still required on all High-Rise buildings in the City. However, FPB's Requirement 10 has been revised to provide two new alternatives to a full FAA-approved helicopter landing pad.

s. SECTION 510 - EMERGENCY RESPONDER RADIO COVERAGE

5101.1 Emergency responder radio coverage in new buildings. All new buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety communication systems of the jurisdiction at the exterior of the

building. This section shall not require improvement of the existing public safety communication systems.

t. All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued.

u. Plans showing areas to be posted and/or painted, "FIRE LANE NO PARKING" shall be submitted and approved by the Fire Department prior to building permit application sign-off.

v. Electric Gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety granting a Certificate of Occupancy.

w. Site plans shall include all overhead utility lines adjacent to the site.

x. Any roof elevation changes in excess of 3 feet may require the installation of ships ladders.

The applicant is further advised that all subsequent contact regarding these conditions must be with the Hydrant and Access Unit. This would include clarification, verification of condition compliance and plans or building permit applications, etc., and shall be accomplished BY APPOINTMENT ONLY, in order to assure that you receive service with a minimum amount of waiting please call (213) 482-6509. You should advise any consultant representing you of this requirement as well.

LOS ANGELES UNIFIED SCHOOL DISTRICT (LAUSD)

10. That prior to the issuance of any demolition or grading permit or any other permit allowing site preparation and/or construction activities on the site, satisfactory arrangements shall be made with the Los Angeles Unified School District. The project site is located on the pedestrian and bus routes for students attending Metropolitan High School. Therefore, the applicant shall make timely contact for coordination to safeguard pedestrians/ motorists with the LAUSD Transportation Branch, phone no. 213-580-2950, and the principals or designees of Metropolitan High School. (This condition may be cleared by a written communication from the LAUSD Transportation Branch attesting to the required coordination and/or the principals of the above referenced schools and to the satisfaction of the Advisory Agency).

DEPARTMENT OF WATER AND POWER

11. Satisfactory arrangements shall be made with the Los Angeles Department of Water and Power (LADWP) for compliance with LADWP's Water System Rules and requirements. Upon compliance with these conditions and requirements, LADWP's Water Services Organization will forward the necessary clearances to the Bureau of Engineering. (This condition shall be deemed cleared at the time the City Engineer clears Condition No. S-1.(c).)

BUREAU OF STREET LIGHTING – SPECIFIC CONDITIONS

12. Street Lighting clearance for this Street Light Maintenance Assessment District condition is conducted at 1149 S. Broadway Suite 200. Street Lighting improvement condition clearance will be conducted at the Bureau of Engineering District office, see condition S-3. (c).

    Prior to the recordation of the final map or issuance of the Certificate of Occupancy (C of O), street lighting improvement plans shall be submitted for review and the owner shall provide a good faith effort via a ballot process for the formation or annexation of the property within the boundary of the development into a Street Lighting Maintenance Assessment District.

BUREAU OF SANITATION

13. Satisfactory arrangements shall be made with the Bureau of Sanitation, Wastewater Collection Systems Division for compliance with its sewer system review and requirements. Upon compliance with its conditions and requirements, the Bureau of Sanitation, Wastewater Collection Systems Division will forward the necessary clearances to the Bureau of Engineering. (This condition shall be deemed cleared at the time the City Engineer clears Condition No. S-1. (d).)

DEPARTMENT OF CITY PLANNING – SITE SPECIFIC CONDITIONS

14. Prior to the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:

    a. Limit the proposed development to a maximum of 344 live-work units and 29,544 square feet of commercial floor area.

    b. Residential parking shall be provided per LAMC Section 12.22-A.25(d). Commercial parking shall be provided per LAMC Section 12.21-A.4(x)(3).

       In addition, prior to issuance of a building permit, a parking plan showing off-street parking spaces, as required by the Advisory Agency, be submitted for review and approval by the Department of City Planning (201 N. Figueroa Street, 4th Floor).

    c. **Note to City Zoning Engineer and Plan Check.** The Advisory Agency has approved the following variations from the Los Angeles Municipal Code as it applies to this subdivision and the proposed development on the site.

       Not Applicable

    d. The applicant shall install an air filtration system(s) to reduce the effects of diminished air quality on occupants of the project.

e. That a solar access report shall be submitted to the satisfaction of the Advisory Agency prior to obtaining a grading permit.

f. That the subdivider consider the use of natural gas and/or solar energy and consult with the Department of Water and Power and Southern California Gas Company regarding feasible energy conservation measures.

g. Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material.

h. INDEMNIFICATION AND REIMBURSEMENT OF LITIGATION COSTS.

Applicant shall do all of the following:

(i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

(ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.

(iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than $25,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a

reasonable time, of if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Action includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

15. That prior to the issuance of the building permit or the recordation of the final map, a copy of Case No. CPC-2013-2993-GPA-VZC-HD-MCUP-ZAA-MSC-SPR shall be submitted to the satisfaction of the Advisory Agency. In the event that Case No. CPC-2013-2993-GPA-VZC-HD-MCUP-ZAA-MSC-SPR is not approved, the subdivider shall submit a tract modification.

DEPARTMENT OF CITY PLANNING - ENVIRONMENTAL MITIGATION MEASURES

16. That prior to recordation of the final map the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770 and Exhibit CP-6770. in a manner satisfactory to the Planning Department requiring the subdivider to identify (a) mitigation monitor(s) who shall provide periodic status reports on the implementation of mitigation items required by Mitigation **Condition Nos. 17 and 18** of the Tract's approval satisfactory to the Advisory Agency. The mitigation monitor(s) shall be identified as to their areas of responsibility, and phase of intervention (pre-construction, construction, postconstruction/ maintenance) to ensure continued implementation of the above mentioned mitigation items.

17. Prior to the recordation of the final map, the subdivider will prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a

manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:

MM-1. The applicant shall comply with the following recommendations as specified in the Phase I Environmental Site Assessment (ESA) in the design and construction of the Industrial Street Lofts Project to the satisfaction of the Department of Building and Safety:

a. Based on the results of the ESA no further inquiry and/or investigation of the subject property is considered practical at this time, and thus none are recommended. However, the Applicant should be aware that isolated pockets of impacted subsurface soil may be encountered during construction and, if encountered, are likely to affect the construction schedule for the planned development. In addition, the unknown underground feature, encountered by BAS, will require further assessment and removal. Should this feature be confirmed to be an underground storage tank, a specialized contractor shall be retained to handle the decommissioning and removal of the tank and associated impacted soil, if any, to the satisfaction of the Los Angeles Fire Department.

b. In the event that the current owners leave the facility "as is" (i.e., all existing equipment, chemicals, debris, waste, etc., will remain at the site and thereby become the property of Camden upon taking possession of the property), the applicant shall retain the services of a qualified demolition contractor, experienced in handling items, which may contain regulated substances and thus require proper draining/ containerization and subsequent disposal/recycling.

c. Should existing engineered fill under Freezer #5 be re-used at the site (based on geotechnical recommendations), the fill soil shall be tested in order to assess whether it meets the residential land use criteria.

MM-2. An air filtration system shall be installed and maintained with filters meeting or exceeding the ASHRAE Standard 52.2 Minimum Efficiency Reporting Value (MERV) of 11, to the satisfaction of the Department of Building and Safety.

MM-3. Wall and floor-ceiling assemblies separating commercial tenant spaces, live/work units, and public places, shall have a Sound Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413.

MM-4. Concrete, not metal, shall be used for construction of parking ramps.

MM-5. The interior ramps shall be textured to prevent tire squeal at turning areas.

MM-6. The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features:

a. Fire lanes, where required, shall be a minimum of 20 feet in width;

b. All structures must be within 300 feet of an approved fire hydrant; and

c. Entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

MM-7. Prior to plan check review, the Project Applicant shall consult with the Los Angeles Fire Department regarding the installation of public and/or private fire hydrants, sprinklers, access, and/or other fire protection features within the Project. All required fire protection features shall be installed to the satisfaction of the Los Angeles Fire Department.

MM-8. The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

MM-9. In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:

a. Weather-based irrigation controller with rain shutoff.

b. Matched precipitation (flow) rates for sprinkler heads.

c. Drip/microspray/subsurface irrigation where appropriate.

d. Minimum irrigation system distribution uniformity of 75 percent.

e. Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials.

f. Use of landscape contouring to minimize precipitation runoff.

MM-10. A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for existing and expanded irrigated landscape areas totaling 5,000 square feet and greater.

MM-11. Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate.

MM-12. Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.

MM-13. A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for all landscape irrigation uses.

MM-14. Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

MM-15. All commercial restroom faucets shall be of a self-closing design.

MM-16. Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.

MM-17. Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the Applicant shall be responsible for ensuring compliance.

MM-18. Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the Applicant shall be responsible for ensuring compliance.

18. **Construction Mitigation Conditions** - Prior to the issuance of a grading or building permit, or the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:

CM-1. That a sign be required on site clearly stating a contact/complaint telephone number that provides contact to a live voice, not a recording or voice mail, during all hours of construction, the construction site address, and the tract map number. YOU ARE REQUIRED TO POST THE SIGN 7 DAYS BEFORE CONSTRUCTION IS TO BEGIN.

a. Locate the sign in a conspicuous place on the subject site or structure if developed) so that it can be easily read by the public. The sign must be sturdily attached to a wooden post if it will be free-standing.

b. Regardless of who posts the site, it is always the responsibility of the applicant to assure that the notice is firmly attached, legible, and remains in that condition throughout the entire construction period.

c. If the case involves more than one street frontage, post a sign on each street frontage involved. If a site exceeds five (5) acres in size, a separate notice of posting will be required for each five (5) acres, or portion thereof. Each sign must be posted in a prominent location.

CM-2. A construction contingency plan for dealing with both anticipated and potential occurrences of environmentally sensitive situations during site redevelopment shall be established and adhered to during construction.

CM-3. Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday and national holidays.

CM-4. Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

CM-5. All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices.

CM-6. Noise and groundborne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, and natural and/or manmade barriers

(e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.

CM-7. Barriers such as, but not limited to, plywood structures or flexible sound control curtains extending eight feet in height shall be erected around the perimeter of the construction site to minimize the amount of noise during construction on the nearby noise-sensitive uses.

CM-8. Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

CM-9. A Construction work site traffic control plan shall be submitted to DOT for review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction related traffic shall be restricted to off-peak hours.

CM-10. All delivery truck loading and unloading shall take place on site.

CM-11. The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.

CM-12. Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.

CM-13. Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.

CM-14. Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

DEPARTMENT OF CITY PLANNING - STANDARD JOINT LIVING AND WORK CONDITIONS

LW-1. Prior to the recordation of the final map, the subdivider shall pay or guarantee the payment of a park and recreation fee based on the latest fee rate schedule applicable. The amount of said fee to be established by the Advisory Agency in

accordance with Section 17.12 of the LAMC and to be paid and deposited in the trust accounts of the Park and Recreation Fund.

LW-2. That a landscape plan, prepared by a licensed landscape architect, be submitted to and approved by the Advisory Agency in accordance with CP-6730 prior to obtaining any permit. The landscape plan shall identify tree replacement on a 1:1 basis by a minimum of 24-inch box trees for the unavoidable loss of desirable trees on the site. Failure to comply with this condition as written shall require the filing of a modification to this tract map in order to clear the condition.

In the event the subdivider decides not to request a permit before the recordation of the final map, the following statement shall appear on the plan and be recorded as a covenant and agreement satisfactory to the Advisory Agency guaranteeing that:

a. The planting and irrigation system shall be completed by the developer/builder prior to the close of escrow of 50 percent of the units of the project or phase.

b. Sixty days after landscape and irrigation installation, the landscape professional shall submit to the homeowners/property owners association a Certificate of Substantial Completion (Sec. 12.40 G LAMC.)

c. The developer/builder shall maintain the landscaping and irrigation for 60 days after completion of the landscape and irrigation installation.

d. The developer/builder shall guarantee all trees and irrigation for a period of six months and all other plants for a period of 60 days after landscape and irrigation installation.

LW-3. In order to expedite the development, the applicant may apply for a building permit for a joint living and work building. However, prior to issuance of a building permit for joint living and work units, the registered civil engineer, architect or licensed land surveyor shall certify in a letter to the Advisory Agency that all applicable tract conditions affecting the physical design of the building and/or site, have been included into the building plans. Such letter is sufficient to clear this condition. In addition, all of the applicable tract conditions shall be stated in full on the building plans and a copy of the plans shall be reviewed and approved by the Advisory Agency prior to submittal to the Department of Building and Safety for a building permit.

OR

If a building permit for joint living and work units will not be requested, the project civil engineer, architect or licensed land surveyor must certify in a letter to the Advisory Agency that the applicant will not request a permit for a joint living and work building and intends to acquire a building permit for a joint living and work condominium building. Such letter is sufficient to clear this condition.

LW-4. That approval of this tract constitutes approval of model home uses, including a sales office and off-street parking. Where the existing zoning is (T) or (Q) for multiple residential use, no construction or use shall be permitted until the final map has recorded or the proper zone has been effectuated. If models are constructed under this tract approval, the following conditions shall apply:

1. Prior to recordation of the final map, the subdivider shall submit a plot plan for approval by the Division of Land Section of the Department of City Planning showing the location of the model dwellings, sales office and off-street parking. The sales office must be within one of the model buildings.

2. All other conditions applying to Model Dwellings under Section 12.22-A,10 and 11 and Section 17.05-O of the Los Angeles Municipal Code (LAMC) shall be fully complied with satisfactory to the Department of Building and Safety.

BUREAU OF ENGINEERING - STANDARD CONDITIONS

S-1. (a) That the sewerage facilities charge be deposited prior to recordation of the final map over all of the tract in conformance with Section 64.11.2 of the Los Angeles Municipal Code (LAMC).

(b) That survey boundary monuments be established in the field in a manner satisfactory to the City Engineer and located within the California Coordinate System prior to recordation of the final map. Any alternative measure approved by the City Engineer would require prior submission of complete field notes in support of the boundary survey.

(c) That satisfactory arrangements be made with both the Water System and the Power System of the Department of Water and Power with respect to water mains, fire hydrants, service connections and public utility easements.

(d) That any necessary sewer, street, drainage and street lighting easements be dedicated. In the event it is necessary to obtain off-site easements by separate instruments, records of the Bureau of Right-of-Way and Land shall verify that such easements have been obtained. The above requirements do not apply to easements of off-site sewers to be provided by the City.

(e) That drainage matters be taken care of satisfactory to the City Engineer.

(f) That satisfactory street, sewer and drainage plans and profiles as required, together with a lot grading plan of the tract and any necessary topography of adjoining areas be submitted to the City Engineer.

(g) That any required slope easements be dedicated by the final map.

(h) That each lot in the tract comply with the width and area requirements of the Zoning Ordinance.

(i) That 1-foot future streets and/or alleys be shown along the outside of incomplete public dedications and across the termini of all dedications abutting unsubdivided property. The 1-foot dedications on the map shall include a restriction against their use of access purposes until such time as they are accepted for public use.

(j) That any 1-foot future street and/or alley adjoining the tract be dedicated for public use by the tract, or that a suitable resolution of acceptance be transmitted to the City Council with the final map.

(k) That no public street grade exceeds 15%.

(l) That any necessary additional street dedications be provided to comply with the Americans with Disabilities Act (ADA) of 1990.

S-2. That the following provisions be accomplished in conformity with the improvements constructed herein:

(a) Survey monuments shall be placed and permanently referenced to the satisfaction of the City Engineer. A set of approved field notes shall be furnished, or such work shall be suitably guaranteed, except where the setting of boundary monuments requires that other procedures be followed.

(b) Make satisfactory arrangements with the Department of Traffic with respect to street name, warning, regulatory and guide signs.

(c) All grading done on private property outside the tract boundaries in connection with public improvements shall be performed within dedicated slope easements or by grants of satisfactory rights of entry by the affected property owners.

(d) All improvements within public streets, private streets, alleys and easements shall be constructed under permit in conformity with plans and specifications approved by the Bureau of Engineering.

(e) Any required bonded sewer fees shall be paid prior to recordation of the final map.

S-3. That the following improvements be either constructed prior to recordation of the final map or that the construction be suitably guaranteed:

(a) Construct on-site sewers to serve the tract as determined by the City Engineer.

(b) Construct any necessary drainage facilities.

(c) Install street lighting facilities to serve the tract as required by the Bureau of Street Lighting.

a. Construct one new street light on Alameda Street.

b. Construct five new street lights on Industrial Street.

c. Construct one new street light on Mill Street.

Notes:

The quantity of street lights identified may be modified slightly during the plan check process based on illumination calculations and equipment selection.

Conditions set: 1) in compliance with a Specific Plan, 2) by LADOT, or 3) by other legal instrument excluding the Bureau of Engineering condition S-3 (i), requiring an improvement that will change the geometrics of the public roadway or driveway apron may require additional or the reconstruction of street lighting improvements as part of that condition.

(d) Plant street trees and remove any existing trees within dedicated streets or proposed dedicated streets as required by the Street Tree Division of the Bureau of Street Maintenance. All street tree plantings shall be brought up to current standards. When the City has previously been paid for tree planting, the subdivider or contractor shall notify the Urban Forestry Division ((213) 847-3077) upon completion of construction to expedite tree planting.

(e) Repair or replace any off-grade or broken curb, gutter and sidewalk satisfactory to the City Engineer.

(f) Construct access ramps for the handicapped as required by the City Engineer.

(g) Close any unused driveways satisfactory to the City Engineer.

(h) Construct any necessary additional street improvements to comply with the Americans with Disabilities Act (ADA) of 1990.

(i) That the following improvements be either constructed prior to recordation of the final map or that the construction be suitably guaranteed:

a. Improve Alameda being dedicated and adjoining the subdivision by the construction of the following:

(1) A concrete curb, a concrete gutter, and a 15-foot full-width concrete sidewalk with tree wells.

(2) Suitable surfacing to join the existing pavement and to complete 35-foot half roadway.

(3) The necessary transitions to join the existing improvement.

(4) Relocation of the existing catch basin along Alameda Street satisfactory to the City Engineer.

b. Improve Industrial Street and Mills Street being dedicated and adjoining the tract by the construction of additional concrete sidewalks within the newly dedicated areas to complete full-width concrete sidewalks with tree wells including any necessary removal and reconstruction of the existing improvements satisfactory to the City Engineer.

NOTES:

The Advisory Agency approval is the maximum number of units permitted under the tract action. However the existing or proposed zoning may not permit this number of units. This vesting map does not constitute approval of any variations from the Los Angeles Municipal Code (LAMC), unless approved specifically for this project under separate conditions.

Any removal of the existing street trees shall require Board of Public Works approval.

Satisfactory arrangements shall be made with the Los Angeles Department of Water and Power, Power System, to pay for removal, relocation, replacement or adjustment of power facilities due to this development. The subdivider must make arrangements for the underground installation of all new utility lines in conformance with Section 17.05-N of the LAMC.

The final map must be recorded within 36 months of this approval, unless a time extension is granted before the end of such period.

The Advisory Agency hereby finds that this tract conforms to the California Water Code, as required by the Subdivision Map Act.

The subdivider should consult the Department of Water and Power to obtain energy saving design features which can be incorporated into the final building plans for the subject development. As part of the Total Energy Management Program of the Department of Water and Power, this no-cost consultation service will be provided to the subdivider upon his request.

FINDINGS OF FACT (CEQA)

The project was issued Mitigated Negative Declaration ENV-2013-2994-MND on July 18, 2016. Potential negative impacts could occur from the project's implementation due to:

Hazardous Materials Site
Land Use / Planning
Increased Noise Levels (Demolition, Grading, and Construction Activities)
Increased Noise Levels (Mixed-Use Development)
Increased Noise Levels (Parking Structure Ramps)
Public Services (Fire Protection)
Public Services (Police – Demolition / Construction Sites)

Public Services (Police)
Transportation / Traffic
Utilities (Local Water Supplies – Landscaping)
Utilities (Local Water Supplies – All New Construction)
Utilities (Local Water Supplies – New Commercial or Industrial)
Utilities (Local Water Supplies – New Residential)

The Deputy Advisory Agency, certifies that Mitigated Negative Declaration No. ENV-2013-2994-MND reflects the independent judgment of the lead agency and determined that this project would not have a significant effect upon the environment provided the potential impacts identified above are mitigated to a less than significant level through implementation of **Condition Nos. 17 and 18** of the Tract's approval. Other identified potential impacts not mitigated by these conditions are mandatorily subject to existing City ordinances, (Sewer Ordinance, Grading Ordinance, Flood Plain Management Specific Plan, Xeriscape Ordinance, Stormwater Ordinance, etc.) which are specifically intended to mitigate such potential impacts on all projects.

In accordance with Section 21081.6 of the Public Resources Code (AB3180), the Deputy Advisory Agency has assured that the above identified mitigation measures will be implemented by requiring reporting and monitoring as specified in Condition No. 16.

Furthermore, the Advisory Agency hereby finds that modification(s) to and/or correction(s) of specific mitigation measures have been required in order to assure appropriate and adequate mitigation of potential environmental impacts of the proposed use of this subdivision.

FINDINGS OF FACT (SUBDIVISION MAP ACT)

In connection with the approval of Vesting Tentative Tract No. 74112, the Advisory Agency of the City of Los Angeles, pursuant to Sections 66473.1, 66474.60, .61 and .63 of the State of California Government Code (the Subdivision Map Act), makes the prescribed findings as follows:

(a) THE PROPOSED MAP IS CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

The adopted Central City North Plan designates the subject property for heavy manufacturing land use with the corresponding zone of M3. The property contains approximately 2.59 net acres (112,842 net square feet) after required dedication and is presently zoned M3-1-RIO. The proposed 14-lot airspace subdivision is allowable under the current adopted zone and the land use designation. The project site is within the River Improvement Overlay (RIO) District.

Related Case No. CPC-2013-2993-GPA-VZC-HD-MCUP-ZAA-MSC-SPR includes a general plan amendment to change the land use designation from Heavy Industrial to Community Commercial, a vesting zone change / height district change from M3-1-RIO (Heavy Manufacturing) to C2-2D-RIO (Commercial). The requested Community Commercial land use correlated C2 Zone would allow the proposed residential and commercial development on the property. The tract map approval is conditioned on the approval of the General Plan Amendment and Zone

Change / Height District Change (Condition No. 15). The project also proposes a ministerial density bonus to increase their base density from 282 units to 344 units.

Residential parking will be provided per the ministerial density bonus parking requirements stated in LAMC Section 12.22-A.25(d). The project will provide 397 resident parking spaces and 80 guest parking spaces for the 344 live-work apartment units.

The project site is located within the Los Angeles State Enterprise zone. Per LAMC 12.21-A.4(x)(3), areas within any Enterprise Zone only need to provide two parking spaces for every 1,000 square feet of commercial space. Based on this requirement, the 29,544 square foot site is required to provide 59 commercial parking spaces.

The project will include 394 on-site bicycle parking spaces, meeting requirements of the Bicycle Ordinance (Ordinance No. 182,386). The live-work units require 379 bicycle parking spaces, including 35 short-term and 344 long-term spaces. The commercial area requires 14 bicycle parking spaces, including 6 short-term and 8 long-term spaces.

Therefore, the proposed map will be consistent with the applicable General Plan upon approval of the General Plan Amendment and the Zone Change.

(b) THE DESIGN OR IMPROVEMENT OF THE PROPOSED SUBDIVISION IS CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

The Bureau of Engineering has reviewed the proposed subdivision and found the subdivision layout generally satisfactory and that there are existing sewers in the streets adjoining the subdivision. As a condition of approval, the subdivider is required to make dedications and improvements on Industrial Street, Alameda Street and Mill Street in order to meet current street standards. The Bureau of Street Lighting has also reviewed the proposed subdivision and has conditioned the subdivision approval to construct new street lights on Industrial Street, Alameda Street and Mill Street in order to meet current street lighting standards. This tract will connect to the public sewer system and will not result in violation of the California Water Code. The Bureau of Sanitation reviewed the sewer/storm drain lines serving the proposed subdivision and found no potential problems to their structures or potential maintenance problems.

Therefore, as conditioned, the proposed tract map is consistent with the intent and purpose of the applicable General and Specific Plans.

(c) THE SITE IS PHYSICALLY SUITABLE FOR THE TYPE OF DEVELOPMENT.

The site is level and is not located in a slope stability study area, high erosion hazard area, or a fault-rupture study zone. The Department of Building and Safety, Grading Division, has tentatively approved the tract map without conditions.

The site is not subject to the Specific Plan for the Management of Flood Hazards (floodways, floodplains, mud prone areas, coastal high-hazard and flood-related erosion hazard areas).

A tree letter dated February 12, 2016, certified that there are no protected trees on the project site.

The project engineer has certified that the subject site is not located in a flood hazard, a hillside, or a mud-prone area. However, the project is located in a Methane Buffer Zone. Prior to the issuance of a building permit, a qualified engineer will be required to investigate and design a methane mitigation system in compliance with the Department of Building and Safety Methane Mitigation Standards for the appropriate Site Design Level, which will prevent or retard potential methane gas seepage into the building.

(d) THE SITE IS PHYSICALLY SUITABLE FOR THE PROPOSED DENSITY OF DEVELOPMENT.

The approximately 2.59 acre site is currently zoned M3-1-RIO. The proposed map includes an accompanying request for a general plan amendment to change the Central City North land use designation from Heavy Industrial to Community Commercial, a vesting zone change / height district change from M3-1-RIO (Heavy Manufacturing) to C2-2D-RIO (Commercial), a zoning administrator adjustment for reduced setbacks, a master conditional use permit for the sale of alcohol for on-site restaurant consumption, a director's decision for reduced residential open space, and an approval of Site Plan Review findings (Case No. CPC-2013-2993-GPA-VZC-HD-MCUP-ZAA-MSC-SPR). The current plan designation of Heavy Industrial and the M3-1-RIO Zone would not allow residential and commercial uses on the site. The land use designation change and zone change would allow the C2 Zone to be developed at the R4 density (LAMC 12.14 C.4) which is 400 square feet of lot area per dwelling unit. This would allow a base density of 282 live-work apartment units. A ministerial 22.5 percent density bonus would increase the maximum density from 282 to 344 units by providing 6 percent of the base density, 17 units, as Very Low Income units.

The Height District Change from Height District No. 1 to Height District No. 2D would allow an increase in the Floor Area Ratio (FAR) from 1.5:1 to 6:1. Although Height District No. 2 allows an FAR of 6:1, the D limitation reduces the maximum FAR to 3:1. The project will be built at or less than 2.98:1 FAR. This would allow for a mix of commercial and residential uses as permitted by LAMC Section 12.22 A.18(a).

The project site is currently served by two MTA Rapid Bus Lines, including lines 720 and 760, and five MTA Local Bus Lines, including lines 18, 28, 53, 60 and 62. These lines provide connections to the downtown subway stations, which include Pershing Square and 7th Street/Metro Center. Additionally, the Greyhound Bus Terminal is located one block south of the project site on 7th Street, which provides inter-city bus services to various locations outside of the Los Angeles area.

The project is also served by the Metro Gold Line rail system located at the Little Tokyo/Arts District station near 1st Street and Alameda Street. The Metro Gold Line offers service to East Los Angeles to the east and Pasadena to the northeast. The Metro Gold Line connects to Union Station, providing access to Metrolink, the Metro Silver Bus Line, and Metro Rail Red and Purple Lines.

(e) THE DESIGN OF THE SUBDIVISION OR THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SUBSTANTIAL ENVIRONMENTAL DAMAGE OR SUBSTANTIALLY AND AVOIDABLY INJURE FISH OR WILDLIFE OR THEIR HABITAT.

The Deputy Advisory Agency certified that Mitigated Negative Declaration No. ENV-2013-2994-MND reflects the independent judgement of the lead agency and determined that this project would not have a significant effect upon the environment provided that the potential impacts identified above are mitigated to a less than significant level through implementation of **Conditions Nos. 17 and 18** of the Tract's approval.

The Initial Study, prepared for the project by Parker Environmental Consultants (published on July 18, 2016), identifies potential adverse impact on fish or wildlife resources as far as earth, air, and plant life are concerned. However, measures are required as part of this approval, which will mitigate the above mentioned impacts to a less than significant level. Furthermore, the project site, as well as the surrounding area is presently developed with structures and does not provide a natural habitat for either fish or wildlife.

Any demolition, grading, and construction will be conducted per the requirements of the Los Angeles Municipal Code and associated permits needed to perform such work. These permits also restrict work hours to mitigate noise pollution.

(f) THE DESIGN OF THE SUBDIVISION OR TYPE OF IMPROVEMENTS IS NOT LIKELY TO CAUSE SERIOUS PUBLIC HEALTH PROBLEMS.

There appears to be no potential public health problems caused by the design or improvement of the proposed subdivision. The development is required to be connected to the City's sanitary sewer system, where the sewage will be directed to the LA Hyperion Treatment Plant, which has been upgraded to meet Statewide ocean discharge standards. The Bureau of Engineering has reported that the proposed subdivision does not violate the existing California Water Code because the subdivision will be connected to the public sewer system and will have only a minor incremental impact on the quality of the effluent from the Hyperion Treatment Plant.

(g) THE DESIGN OF THE SUBDIVISION OR THE TYPE OF IMPROVEMENTS WILL NOT CONFLICT WITH EASEMENTS, ACQUIRED BY THE PUBLIC AT LARGE, FOR ACCESS THROUGH OR USE OF PROPERTY WITHIN THE PROPOSED SUBDIVISION.

There are no recorded instruments identifying easements encumbering the project site for the purpose of providing public access. The project site contains legally

recorded lots identified by the Assessor Parcel Record. The site is surrounded by private and public properties that adjoin improved public streets and sidewalks designed and improved for the specific purpose of providing public access throughout the area. The project site does not adjoin or provide access to a public resource, natural habitat, Public Park or any officially recognized public recreation area. Therefore, the design of the subdivision and the proposed improvements would not conflict with easements acquired by the public at large for access through or use of property within the proposed subdivision.

(h) THE DESIGN OF THE PROPOSED SUBDIVISION SHALL PROVIDE, TO THE EXTENT FEASIBLE, FOR FUTURE PASSIVE OR NATURAL HEATING OR COOLING OPPORTUNITIES IN THE SUBDIVISION. (REF. SECTION 66473.1)

In assessing the feasibility of passive or natural heating or cooling opportunities in the proposed subdivision design, the applicant has prepared and submitted materials which consider the local climate, contours, configuration of the parcel(s) to be subdivided and other design and improvement requirements.

Providing for passive or natural heating or cooling opportunities will not result in reducing allowable densities or the percentage of a lot which may be occupied by a building or structure under applicable planning and zoning in effect at the time the tentative map was filed.

The lot layout of the subdivision has taken into consideration the maximizing of the north/south orientation.

The topography of the site has been considered in the maximization of passive or natural heating and cooling opportunities.

In addition, prior to obtaining a building permit, the subdivider shall consider building construction techniques, such as overhanging eaves, location of windows, insulation, exhaust fans; planting of trees for shade purposes and the height of the buildings on the site in relation to adjacent development.

These findings shall apply to both the tentative and final maps for Tract No. 74112.

VINCENT P. BERTONI, AICP
Advisory Agency

KEVIN S. GOLDEN
Deputy Advisory Agency

BLAKE E. LAMB
Senior City Planner

VPB:KSG:BEL:AEB

Note: If you wish to file an appeal, it must be filed within 10 calendar days from the decision date as noted in this letter. For an appeal to be valid to the City Planning Commission or Area Planning Commission, it must be accepted as complete by

the City Planning Department and appeal fees paid, prior to expiration of the above 10-day time limit. Such appeal must be submitted on Master Appeal Form No. CP-7769 at the Department's Public Offices, located at:

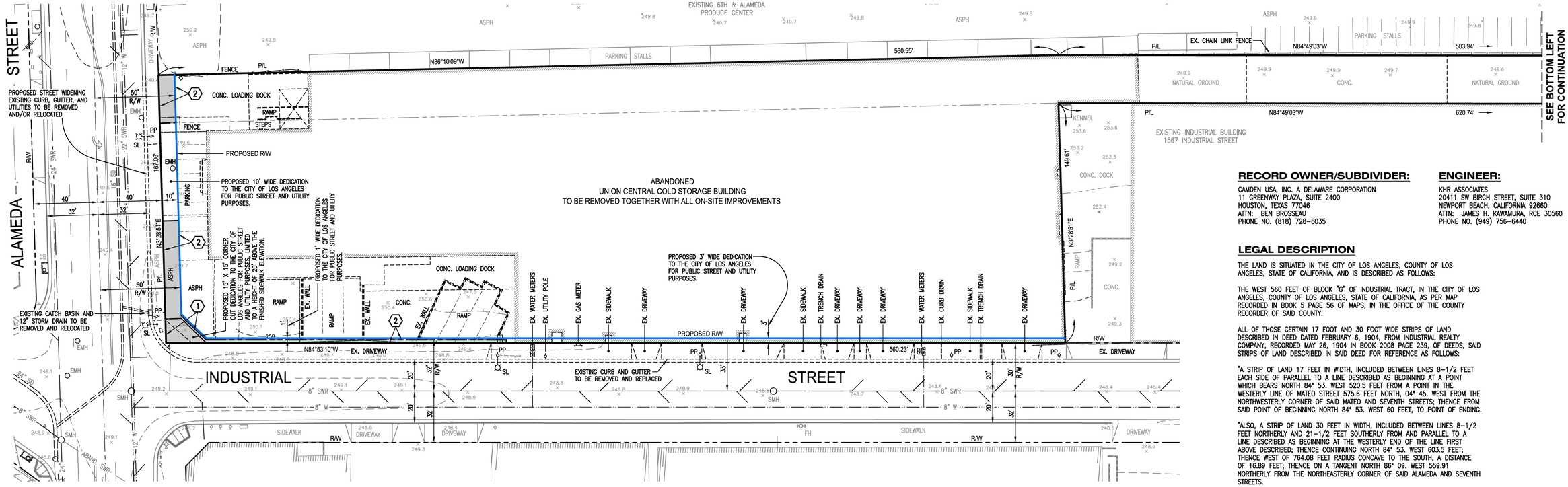
Figueroa Plaza
201 North Figueroa Street
4th Floor
Los Angeles, CA 90012
(213) 482-7077

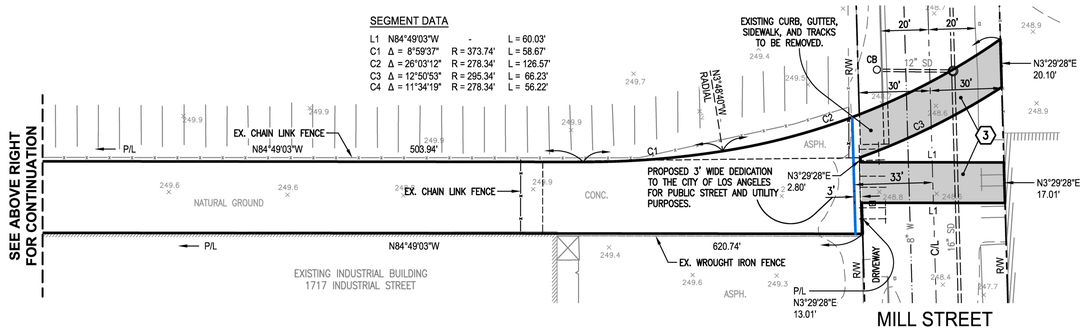
Marvin Braude San Fernando
Valley Constituent Service Center
6262 Van Nuys Boulevard, Room 251
Van Nuys, CA 91401
(818) 374-5050

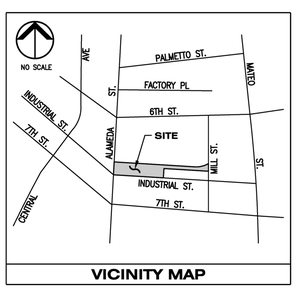
Forms are also available on-line at http://cityplanning.lacity.org

The time in which a party may seek judicial review of this determination is governed by California Code of Civil Procedure Section 1094.6. Under that provision, a petitioner may seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, only if the petition for writ of mandate pursuant to that section is filed no later than the 90th day following the date on which the City's decision becomes final.

(11-16-16)
Commercial Condos







LEGEND

- BOUNDARY
- CENTERLINE
- PROPOSED RIGHT OF WAY
- RIGHT OF WAY
- LOTLINE
- CONTOUR LINE
- CHAIN LINK FENCE
- W.I. FENCE
- OVERHEAD POWER LINE
- CONCRETE WALL
- FIRE HYDRANT
- STREET LIGHT
- POWER POLE
- EXISTING EASEMENT

0 15' 30' 60' 90'

SCALE: 1"=30'

KHR ASSOCIATES
CONSULTING ENGINEERS/SURVEYORS/PLANNERS
20411 SW Birch Street - Suite 310 Tel (949) 756-6440
Newport Beach, California 92660 Fax (949) 756-6444

AREA

EXISTING: GROSS AREA (TO CENTER OF LINE OF STREET) = 142,762 S.F. (3.277 ACRES)
NET AREA = 118,581 S.F. (2.722 ACRES)
NET AREA (EXCLUDING EX. STREET EASEMENTS) = 114,848 S.F. (2.636 ACRES)

PROPOSED: LOT 1 = 112,843 S.F. (2.590 ACRES)

PROJECT SUMMARY

PROPOSED LOT	LOT 1 (WITH 13 AIRSPACE LOTS)
PROJECT ADDRESS	1525 INDUSTRIAL STREET
EXISTING ZONING	M3-1-RIO
PROPOSED ZONING	C2-2D-RIO
PROJECT DESCRIPTION	PROPOSED 7-STORY MIXED-USE APARTMENT BUILDING (344 DWELLING UNITS), INCLUDING 5 LEVELS OF DWELLINGS UNITS ABOVE A TWO LEVEL PARKING GARAGE WITH RESTAURANT AND CREATIVE OFFICES WITH MEZZANINE OVER ONE LEVEL OF SUBTERRANEAN PARKING GARAGE, TOGETHER WITH A 2-STORY CREATIVE OFFICE BUILDING (1,674 S.F.) AND A 4-STORY BUILDING WITH 2 LEVELS OF RESTAURANT (2,932 S.F.) BELOW 2 LEVELS OF CREATIVE OFFICE USE (3,516 S.F.)
PROPOSED COMMERCIAL AREA	29,544 S.F.
PROPOSED PARKING	536 TOTAL STALLS
BUILDING HEIGHT	85 FEET MAXIMUM

NOTE:

1) ALL EXISTING FACILITIES WITHIN THE PROPERTY BOUNDARY ARE TO BE REMOVED.
2) EXISTING DRIVEWAYS WILL BE REMOVED AND REPLACED WITH FULL HEIGHT CURB, GUTTER AND FULL LENGTH WALK.
3) NO OAK TREES AND/OR PROTECTED TREES EXIST ON THE PROJECT SITE.
4) PROJECT SITE IS NOT WITHIN A SPECIAL HAZARD AREA; A HILLSIDE AREA; A FLOODWAY; OR A MUD-PRONE AREA.
5) SEWER LATERALS WILL BE PROVIDED ON INDUSTRIAL AND ALAMEDA STREET. LOW IMPACT DEVELOPMENT RUNOFF WILL BE CONVEYED TO UNDERGROUND INFILTRATION TANK, OVERFLOW WILL THEN BE CONVEYED TO EXISTING STORM DRAIN PIPE ON MILL STREET.

ABBREVIATIONS

ASPH	ASPHALT PAVEMENT
CONC.	CONCRETE PAVEMENT
W	WATER LINE
SWR	SEWER SERVICE
SD	STORM DRAIN PIPE
EMH	ELECTRICAL MANHOLE
CB	CATCH BASIN
PP	POWER POLE
SL	STREET LIGHT
C/L	CENTERLINE
R/W	RIGHT OF WAY
P/L	PROPERTY LINE

RECORD OWNER/SUBDIVIDER:

CAMDEN USA, INC. A DELAWARE CORPORATION
11 GREENWAY PLAZA, SUITE 2400
HOUSTON, TEXAS 77046
ATTN: BEN BROSSEAU
PHONE NO. (818) 728-6035

ENGINEER:

KHR ASSOCIATES
20411 SW BIRCH STREET, SUITE 310
NEWPORT BEACH, CALIFORNIA 92660
ATTN: JAMES H. KAWAMURA, RCE 30560
PHONE NO. (949) 756-6440

LEGAL DESCRIPTION

THE LAND IS SITUATED IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

THE WEST 560 FEET OF BLOCK "G" OF INDUSTRIAL TRACT, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 5 PAGE 56 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

ALL OF THOSE CERTAIN 17 FOOT AND 30 FOOT WIDE STRIPS OF LAND DESCRIBED IN DEED DATED FEBRUARY 6, 1904, FROM INDUSTRIAL REALTY COMPANY, RECORDED MAY 26, 1904 IN BOOK 2008 PAGE 239, OF DEEDS, SAID STRIPS OF LAND DESCRIBED IN SAID DEED FOR REFERENCE AS FOLLOWS:

"A STRIP OF LAND 17 FEET IN WIDTH, INCLUDED BETWEEN LINES 8-1/2 FEET EACH SIDE OF PARALLEL TO A LINE DESCRIBED AS BEGINNING AT A POINT WHICH BEARS NORTH 84° 53. WEST 520.5 FEET FROM A POINT IN THE WESTERLY LINE OF MATEO STREET 575.6 FEET NORTH, 04° 45. WEST FROM THE NORTHWESTERLY CORNER OF SAID MATEO AND SEVENTH STREETS; THENCE FROM SAID POINT OF BEGINNING NORTH 84° 53. WEST 60 FEET, TO POINT OF ENDING.

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APN: 5164-010-008 AND 5164-010-007

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1. EASEMENT FOR PUBLIC STREET AND INCIDENTAL PURPOSES RECORDED DECEMBER 3, 1970 AS INSTRUMENT NO. 2090 OF OFFICIAL RECORDS.
2. AN OFFER OF DEDICATION TO THE CITY OF LOS ANGELES FOR PUBLIC STREET, ROAD OR HIGHWAY PURPOSES AND INCIDENTAL PURPOSES, AS PER DEED RECORDED AUGUST 6, 1996 AS INSTRUMENT NO. 96-1262409 OF OFFICIAL RECORDS, ACCEPTED BY SAID DEED.
3. EASEMENT FOR STREET AND INCIDENTAL PURPOSES SHOWN OR DEDICATED ON THE MAP OF INDUSTRIAL TRACT RECORDED ON FILE IN BOOK 5, PAGE 56, OF INDUSTRIAL TRACT MAPS.

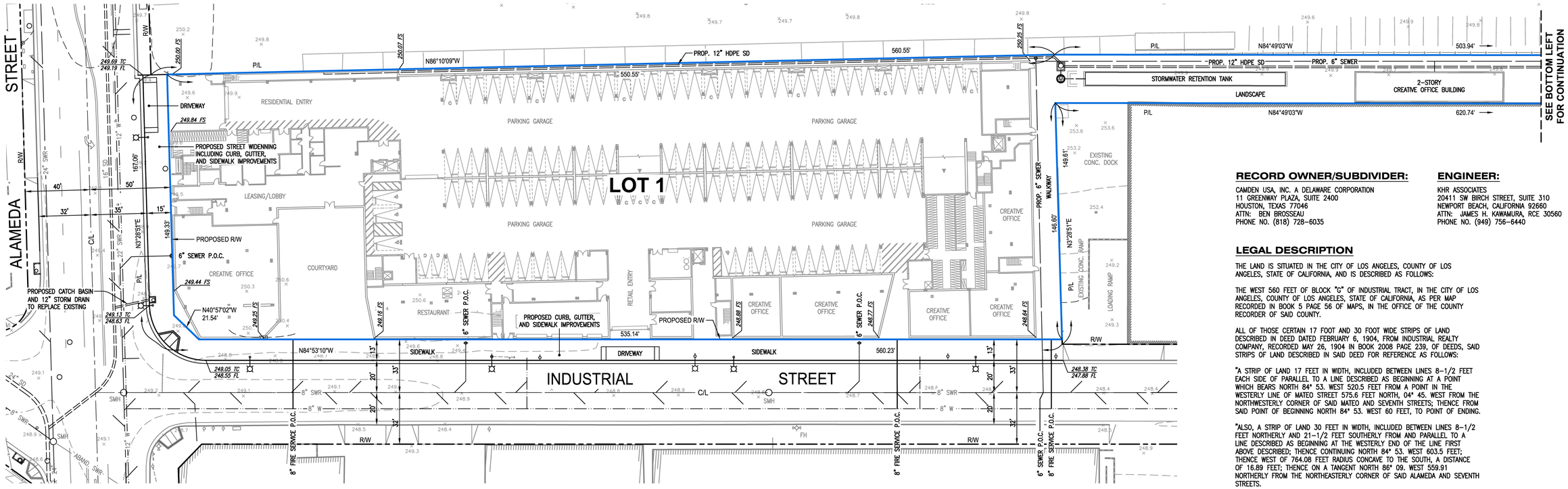
SHEET 1 OF 4

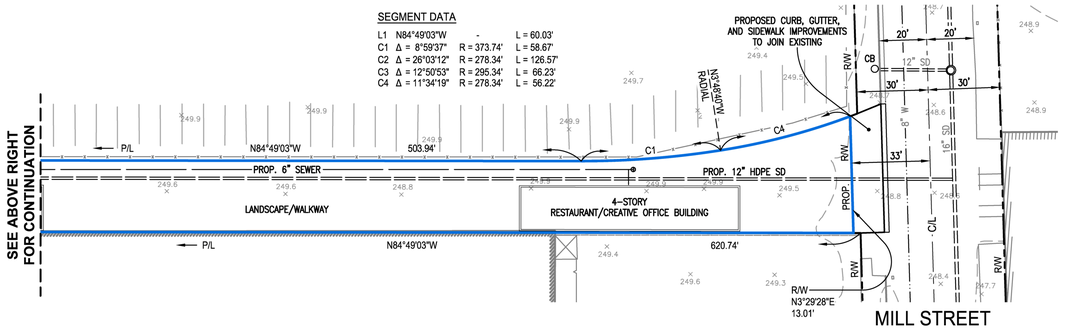
(EXISTING SITE CONDITIONS) APRIL 25, 2016

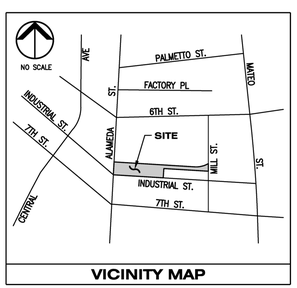
TENTATIVE TRACT MAP NO. 74112

FOR AIRSPACE SUBDIVISION PURPOSES

R:\Camden Development\Camden-Arts\Subdivision & Legals\Tentative Tract Map\CAD-Tentative Tract Map No. 74112- PG1.dwg Apr 25, 2016 - 2:19pm







VICINITY MAP

0 15' 30' 60' 90'

SCALE: 1"=30'

LEGEND

- PROPOSED BOUNDARY
- CENTERLINE
- RIGHT OF WAY
- LOTLINE
- CONTOUR LINE
- CHAIN LINK FENCE
- W.I. FENCE
- OVERHEAD POWER LINE
- CONCRETE WALL
- FIRE HYDRANT
- STREET LIGHT
- POWER POLE
- EXISTING EASEMENT

AREA

EXISTING: GROSS AREA (TO CENTER OF LINE OF STREET) = 142,762 S.F. (3.277 ACRES)
NET AREA = 118,581 S.F. (2.722 ACRES)
NET AREA (EXCLUDING EX. STREET EASEMENTS) = 114,848 S.F. (2.636 ACRES)

PROPOSED: LOT 1 = 112,843 S.F. (2.590 ACRES)

PROJECT SUMMARY

PROPOSED LOT	LOT 1 (WITH 13 AIRSPACE LOTS)
PROJECT ADDRESS	1525 INDUSTRIAL STREET
EXISTING ZONING	M3-1-RIO
PROPOSED ZONING	C2-2D-RIO
PROJECT DESCRIPTION	PROPOSED 7-STORY MIXED-USE APARTMENT BUILDING (344 DWELLING UNITS), INCLUDING 5 LEVELS OF DWELLINGS UNITS ABOVE A TWO LEVEL PARKING GARAGE WITH RESTAURANT AND CREATIVE OFFICES WITH MEZZANINE OVER ONE LEVEL OF SUBTERRANEAN PARKING GARAGE, TOGETHER WITH A 2-STORY CREATIVE OFFICE BUILDING (1,674 S.F.) AND A 4-STORY BUILDING WITH 2 LEVELS OF RESTAURANT (2,932 S.F.) BELOW 2 LEVELS OF CREATIVE OFFICE USE (3,516 S.F.)
PROPOSED COMMERCIAL AREA	29,544 S.F.
PROPOSED PARKING	536 TOTAL STALLS
BUILDING HEIGHT	85 FEET MAXIMUM

NOTE:

1) ALL EXISTING FACILITIES WITHIN THE PROPERTY BOUNDARY ARE TO BE REMOVED.
2) EXISTING DRIVEWAYS WILL BE REMOVED AND REPLACED WITH FULL HEIGHT CURB, GUTTER AND FULL LENGTH WALK.
3) NO OAK TREES AND/OR PROTECTED TREES EXIST ON THE PROJECT SITE.
4) PROJECT SITE IS NOT WITHIN A SPECIAL HAZARD AREA; A HILLSIDE AREA; A FLOODWAY; OR A MUD-PRONE AREA.
5) SEWER LATERALS WILL BE PROVIDED ON INDUSTRIAL AND ALAMEDA STREET. LOW IMPACT DEVELOPMENT RUNOFF WILL BE CONVEYED TO UNDERGROUND INFILTRATION TANK, OVERFLOW WILL THEN BE CONVEYED TO EXISTING STORM DRAIN PIPE ON MILL STREET.

ABBREVIATIONS

ASPH	ASPHALT PAVEMENT
CONC.	CONCRETE PAVEMENT
W	WATER LINE
SWR	SEWER SERVICE
SD	STORM DRAIN PIPE
EMH	ELECTRICAL MANHOLE
CB	CATCH BASIN
PP	POWER POLE
SL	STREET LIGHT
C/L	CENTERLINE
R/W	RIGHT OF WAY
P/L	PROPERTY LINE

RECORD OWNER/SUBDIVIDER:

CAMDEN USA, INC. A DELAWARE CORPORATION
11 GREENWAY PLAZA, SUITE 2400
HOUSTON, TEXAS 77046
ATTN: BEN BROSSEAU
PHONE NO. (818) 728-6035

ENGINEER:

KHR ASSOCIATES
20411 SW BIRCH STREET, SUITE 310
NEWPORT BEACH, CALIFORNIA 92660
ATTN: JAMES H. KAWAMURA, RCE 30560
PHONE NO. (949) 756-6440

LEGAL DESCRIPTION

THE LAND IS SITUATED IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

THE WEST 560 FEET OF BLOCK "G" OF INDUSTRIAL TRACT, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 5 PAGE 56 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

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KHR ASSOCIATES
CONSULTING ENGINEERS/SURVEYORS/PLANNERS
20411 SW Birch Street - Suite 310 Tel (949) 756-6440
Newport Beach, California 92660 Fax (949) 756-6444

SHEET 2 OF 4

(PROJECT SITE PLAN) APRIL 25, 2016

TENTATIVE TRACT MAP NO. 74112

FOR AIRSPACE SUBDIVISION PURPOSES

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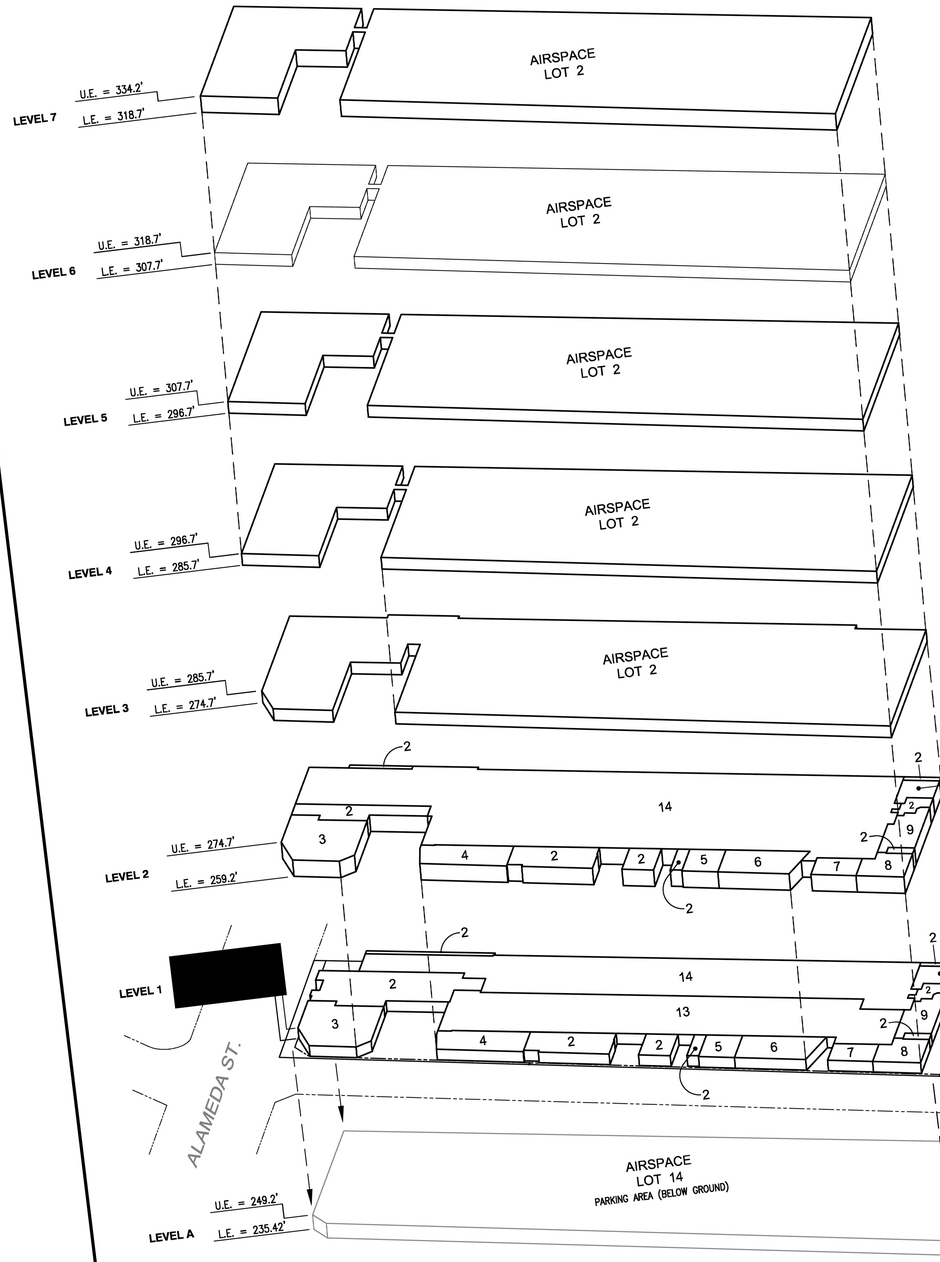

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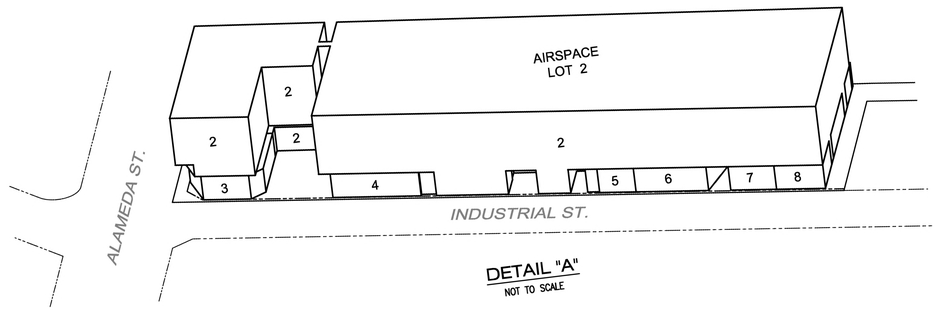
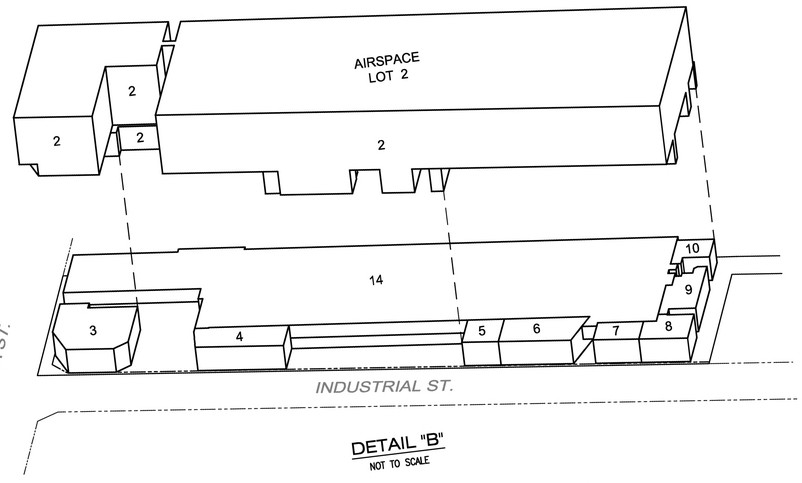


DETAIL "A"
NOT TO SCALE



DETAIL "B"
NOT TO SCALE

LOT 1 LEGEND:

L.E. = LOWER ELEVATION
U.E. = UPPER ELEVATION
LOT 1 = MASTER LOT 1

NOTE:

1. LOT 1 INCLUDES ALL THE LAND WITHIN TENTATIVE TRACT NO. 74112 AS WELL AS ALL AIRSPACE NOT INCLUDED WITHIN AIRSPACE LOTS 2 THROUGH 14.
2. RESIDENTIAL: AIRSPACE LOT 2
   COMMERCIAL: AIRSPACE LOTS 3 THROUGH 12
   COMMERCIAL PARKING: AIRSPACE LOT 13
   RESIDENTIAL PARKING: AIRSPACE LOT 14

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Newport Beach, California 92660
Tel (949) 756-6440
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SHEET 3 OF 4
APRIL 25, 2016

(AIRSPACE PLAN)

TENTATIVE TRACT MAP NO. 74112

FOR AIRSPACE SUBDIVISION PURPOSES

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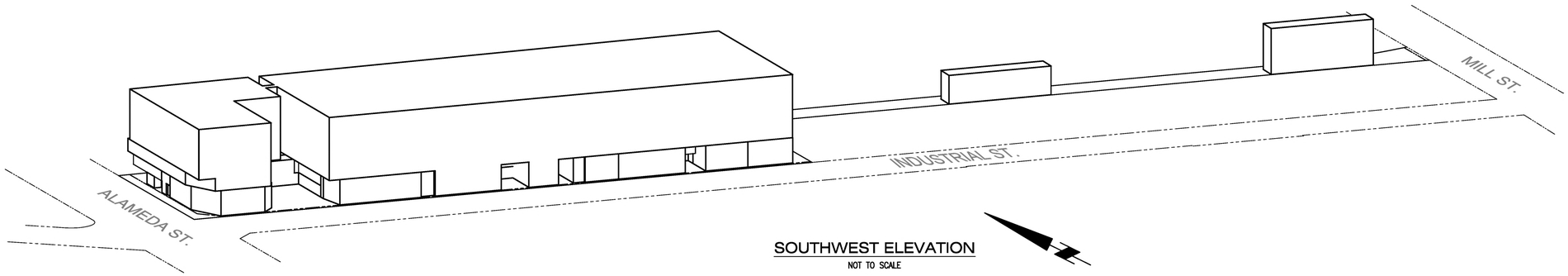

SOUTHWEST ELEVATION

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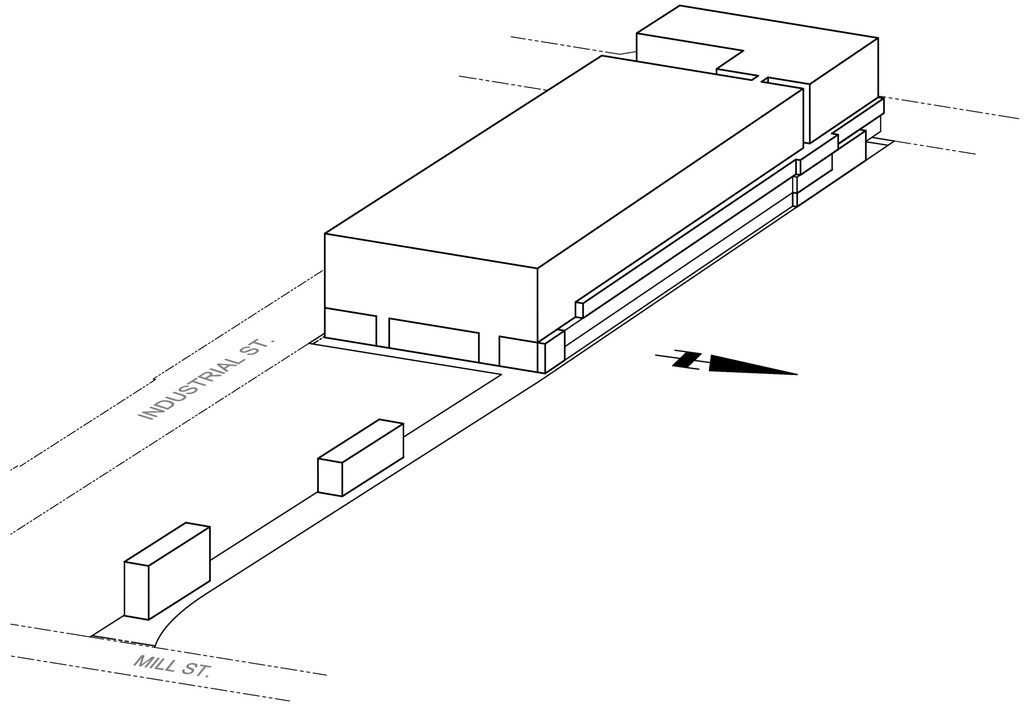

NORTHEAST ELEVATION

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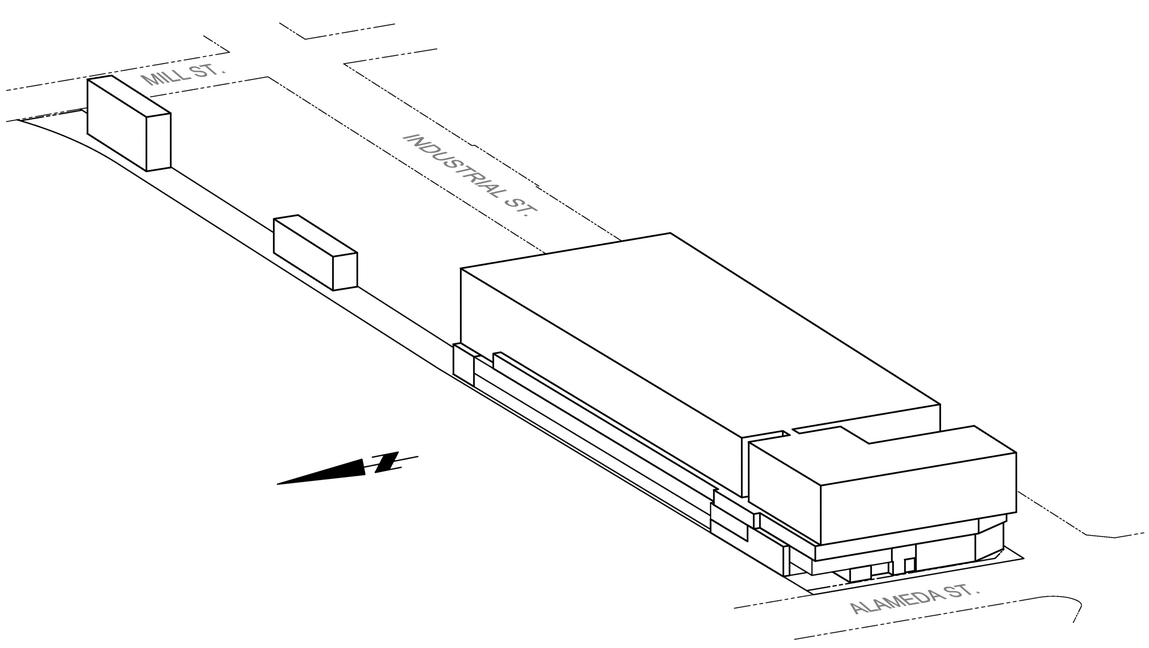

NORTHWEST ELEVATION

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(AIRSPACE ELEVATION PLAN) APRIL 25, 2016

TENTATIVE TRACT MAP NO. 74112

FOR AIRSPACE SUBDIVISION PURPOSES

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EXHIBIT B

Appeal Application

1525 East Industrial Street
Case No. VTT-74112
CEQA No. ENV-2013-2994-MND

Related Case No. CPC-2013-2993-GPA-VZC-HD-MCUP-ZAA-MSC-SPR

APPEAL TO THE LOS ANGELES CITY PLANNING COMMISSION

January 17, 2017

John P. Given – SBN 269787
LAW OFFICE OF JOHN P. GIVEN
2461 Santa Monica Blvd., #438
Santa Monica, CA 90404
john@johngivenlaw.com
(310) 471-8485

Table of Contents

Appeal Application	Tab 1
Appeal Justification/Reasons for Appealing	Tab 2
VTT-74112 Original Determination Letter	Tab 3
Exhibit 1 – Los Angeles Department of City Planning and Community Redevelopment Agency, *Los Angeles' Industrial Land: Sustaining a Dynamic City Economy* (Dec. 2007)	Tab 4
Exhibit 2 – *Kottler v. City of Los Angeles*, Los Angeles Superior Court case no. BS 154184	Tab 5
Exhibit 3 – Los Angeles CEQA Thresholds Guide, Chapter H, Land Use	Tab 6
Exhibit 4 – VTT 74112 radius map	Tab 7

APPLICATIONS:

APPEAL APPLICATION

This application is to be used for any appeals authorized by the Los Angeles Municipal Code (LAMC) for discretionary actions administered by the Department of City Planning.

1. APPELLANT BODY/CASE INFORMATION

Appellant Body:

☐ Area Planning Commission ☑ City Planning Commission ☐ City Council ☐ Director of Planning

Regarding Case Number: VTT-74112, ENV-2013-2994-MND

Project Address: 1525 East Industrial Street, Los Angeles, California 90021

Final Date to Appeal: January 17, 2017

Type of Appeal:
☐ Appeal by Applicant/Owner
☑ Appeal by a person, other than the Applicant/Owner, claiming to be aggrieved
☐ Appeal from a determination made by the Department of Building and Safety

2. APPELLANT INFORMATION

Appellant's name (print): Arts District Community Council Los Angeles ("ADCCLA"); Yuval Bar-Zemer

Company:

Mailing Address: 1855 Industrial Street, Suite 106

City: Los Angeles State: California Zip: 90021

Telephone: E-mail: info@adccla.org; yuval@linear-city.com

- Is the appeal being filed on your behalf or on behalf of another party, organization or company?

  ☑ Self ☐ Other:

- Is the appeal being filed to support the original applicant's position? ☐ Yes ☑ No

3. REPRESENTATIVE/AGENT INFORMATION

Representative/Agent name (if applicable): John Given

Company: Law Office of John P. Given

Mailing Address: 2461 Santa Monica Boulevard, #438

City: Santa Monica State: California Zip: 90404

Telephone: 310.471.8485 E-mail: john@johngivenlaw.com

4. JUSTIFICATION/REASON FOR APPEAL

Is the entire decision, or only parts of it being appealed? ☑ Entire ☐ Part

Are specific conditions of approval being appealed? ☐ Yes ☑ No

If Yes, list the condition number(s) here: _____

Attach a separate sheet providing your reasons for the appeal. Your reason must state:

- The reason for the appeal
- Specifically the points at issue
- How you are aggrieved by the decision
- Why you believe the decision-maker erred or abused their discretion

5. APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true:

Appellant Signature: _____ Date: 1/17/17

6. FILING REQUIREMENTS/ADDITIONAL INFORMATION

- Eight (8) sets of the following documents are required for each appeal filed (1 original and 7 duplicates):
  - Appeal Application (form CP-7769)
  - Justification/Reason for Appeal
  - Copies of Original Determination Letter
- A Filing Fee must be paid at the time of filing the appeal per LAMC Section 19.01 B.
  - Original applicants must provide a copy of the original application receipt(s) (required to calculate their 85% appeal filing fee).
- All appeals require noticing per the applicable LAMC section(s). Original Applicants must provide noticing per the LAMC, pay mailing fees to City Planning's mailing contractor (BTC) and submit a copy of the receipt.
- Appellants filing an appeal from a determination made by the Department of Building and Safety per LAMC 12.26 K are considered Original Applicants and must provide noticing per LAMC 12.26 K.7, pay mailing fees to City Planning's mailing contractor (BTC) and submit a copy of receipt.
- A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.
- Appeals of Density Bonus cases can only be filed by adjacent owners or tenants (must have documentation).
- Appeals to the City Council from a determination on a Tentative Tract (TT or VTT) by the Area or City Planning Commission must be filed within 10 days of the date of the written determination of said Commission.
- A CEQA document can only be appealed if a non-elected decision-making body (ZA, APC, CPC, etc.) makes a determination for a project that is not further appealable. [CA Public Resources Code ' 21151 (c)].

This Section for City Planning Staff Use Only		
Base Fee:	Reviewed & Accepted by (DSC Planner):	Date:
Receipt No:	Deemed Complete by (Project Planner):	Date:
☐ Determination authority notified	☐ Original receipt and BTC receipt (if original applicant)	

LAW OFFICE OF JOHN P. GIVEN
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January 17, 2017

APPEAL TO THE LOS ANGELES CITY PLANNING COMMISSION
Justification/Reasons for Appealing

Case Nos.	**VTT-74112; ENV-2013-2994-MND**
Related Case:	**CPC-2013-2993-GPA-VZC-HD-MCUP-ZAA-MSC-SPR**
Project Location:	**1525 East Industrial**
Determination:	**Approval of Vesting Tentative Tract Map VTT-74112** **Mitigated Negative Declaration ENV-2013-2994-MND**

Arts District Community Council Los Angeles ("ADCCLA") and ADCCLA Founding Board Member Yuval Bar-Zemer (collectively "Appellants") hereby appeal the Deputy Advisory Agency's ("DAA") January 5, 2017 Decision (the "Decision") approving Camden USA's ("Applicant" or "landowner" or "developer") Vesting Tentative Tract Map ("VTT" or "VTT Map") for the proposed project located at 1525 East Industrial Street, Los Angeles ("Proposed Project"). An explanation as to how the Deputy Advisory Agency erred and/or abused its discretion follows.

I. Appellants are Aggrieved by the Decision.

ADCCLA is a non-profit advocacy organization comprised of Arts District community stakeholders, including artists, residents, property owners, and businesses. The ADCCLA seeks to preserve, protect, and enhance Los Angeles' Arts District. Mr. Bar-Zemer is a founding member of ADCCLA, and is also a property owner and long-time community leader in the Arts District. The Proposed Project is adjacent to the Arts District and, if approved, would have a major impact on ADCCLA members, Mr. Bar-Zemer, and Arts District stakeholders.

As explained below, approval of the vesting tentative tract map ("VTT") for the Proposed Project violates the Subdivision Map Act ("SMA") and the Los Angeles City Charter. In addition, adoption of the Mitigated Negative Declaration ("MND") for the Proposed Project violates CEQA in that a fair argument exists that the project may have potentially significant environmental impacts and therefore an environmental impact report ("EIR") is required, rather than an MND. The DAA's

approval of the VTT application despite these significant shortcomings means the decisionmaker has failed to proceed in a manner required by law. The approval must be overturned.

II. The Deputy Advisory Agency's Determination Must Be Overturned Because the Deputy Advisory Agency Does Not Have the Authority to Approve a Vesting Tentative Tract Map That Fails to Comply with Applicable Land Use Standards.

The approval of subdivisions is "governed by the provisions of this chapter and by the additional provisions of local ordinances dealing with subdivisions." (Gov. Code, § 66474.60.) Thus, the Deputy Advisory Agency may only approve a VTT providing the approval process is consistent with the procedures outlined by the Subdivision Map Act *and also* "the additional provision of local ordinances dealing with subdivisions." (*Ibid.*) The Los Angeles Municipal Code ("LAMC" or "Municipal Code") provides specific parameters for the advisory agency's authority to review and approve vesting tentative tract maps. (See LAMC, § 17.03(A).) For example, the Municipal Code provides that the advisory agency has "authority to reduce the width of required passageways" and "to grant deviations… from the applicable area, yard, and height requirements." (*Ibid.*) The LAMC does not, however, provide authority to approve a tentative map for a project that does not comply with the existing General Plan or other zoning requirements. (See LAMC, § 17.03(A); see generally LAMC, § 17.00 *et seq.*)

As discussed in more detail below, the Proposed Project related to the VTT application in this case is inconsistent with both the Central City North Community Plan, part of the General Plan's Land Use Element, and also applicable zoning requirements of the M3-1-RIO zone. (Industrial Streets Loft Project Initial Study/Draft Mitigated Negative Declaration (July 18, 2016) ["Initial Study/MND"], pp. 1, IV-60-62.) The Proposed Project falls within the "South Industrial" subarea, which is "dominated by industrial uses" and designated Heavy Manufacturing. (Central City North Community Plan, I-2-3; Initial Study/MND, pp. 1, IV-61.) Neither the M3-1-RIO zone nor the Heavy Industrial land use designation in the General Plan allow for residential uses. Nonetheless, the Proposed Project seeks to construct 344 residential spaces. (*Id.* at pp. 1, IV-61.)

The Proposed Project does not comply with existing General Plan and zoning requirements, and the Deputy Advisory Agency is not vested with authority to approve projects that do not comply with controlling land use law. Thus, the Deputy Advisory Agency did not have authority to approve the VTT, and the DAA's approval therefore constitutes an abuse of discretion.

III. The Deputy Advisory Agency's VTT Approval Violates the Subdivision Map Act.

The Subdivision Map Act governs the approval of subdivisions and tentative maps. (Gov. Code, § 66474.60.) An Agency may approve a Vesting Tentative Tract map only if the Proposed Project complies with both the SMA and local ordinances governing subdivisions. (See *ibid.*; see also Section I, above.) Approval of a VTT map that does not comply with the SMA is prohibited by law and an abuse of discretion.

A. Approval of a VTT for a project that converts parcels to a zoning designation and use that are inconsistent with the General Plan violates the fundamental purpose of the Subdivision Map Act.

The SMA was enacted "[t]o encourage orderly community development by providing for the regulation of the design and improvement of the subdivision, with… proper consideration of its relation to adjoining areas." (61 Ops. Cal. Atty. Gen. 299, 301 (1978); 77 Ops. Cal. Atty. Gen. 185 (1994).) The approved VTT undermines consistent community development. The Proposed Project is inconsistent with current zoning regulations and the General Plan – regulations designed to ensure consistent development and land use. (See discussion, Sections III.B, IV.) Approval of the Proposed Project even though it fails to conform to the existing General Plan and zoning regulations demonstrates that the DAA's VTT determination did not properly consider the Project's relation to adjoining parcels and surrounding area of the Project site. (See Initial Study/MND at II-4 [surrounding parcels primarily zoned M3-1-RIO].) Approval of the Project undermines the purpose of the SMA and therefore constitutes an abuse of discretion.

B. Approval of the proposed VTT violates the SMA because the VTT is inconsistent with the General Plan.

Section 66474.61 of the SMA requires denial of a tentative map that is inconsistent with the applicable general plan:

> In cities having a population of more than 2,800,000, the advisory agency… *shall deny* approval of a tentative map . . . if it makes *any* of the following findings: (a) That the proposed map is not consistent with applicable general and specific plans [or] (b) That the design or improvement of the proposed subdivision is not consistent with applicable general and specific plans . . ."

(Gov. Code, § 66474.61 (emphasis added).) "[A]pproval of subdivisions which are inconsistent with a locality's general plan subverts the integrity . . . of the local planning process." (*Woodland Hills Residents Assn., Inc. v. City Council* (1979) 23 Cal.3d 917, 936 (internal quotation marks omitted).) Here, neither the proposed map nor the Proposed Project is consistent with the applicable general plan.

The Proposed Project is within the jurisdiction of the Central City North Community Plan. (Initial Study/MND, p. 1.) It falls within the "South Industrial" subarea, which is "dominated by industrial uses" and is designated Heavy Manufacturing. (Central City North Community Plan, I-2-3; Initial Study/MND, p. 1, IV-58.) The MND notes that the M3-1 zone "in general does not currently allow for residential land uses." (Initial Study/MND at IV-61; see Central City North Community Plan.) In fact, the M3-1 zone does not allow residential uses, in general or otherwise. (See Initial Study/MND, p. IV-58 ["residential uses are not permitted in industrial zones"].) In order to construct new residential units, including live/work units, an applicant with an M3-1 zoned property must obtain a zone change. The Project proposes live/work units, restaurants, and office space that are incompatible with the existing General Plan (and zoning) designations. (Initial Study/MND at IV-61.) Here, because of the inconsistency with the General Plan and zoning, the applicant seeks a zone change and also an amendment to the General Plan.

The requested General Plan Amendment ("GPA") would re-designate the site's land use from Heavy Manufacturing to Community Commercial. (Case Number ENV-2013-2994-MND, CPC-2013-2993-GPA-VZC-HD-MCUP-ZAA-MSC-SPR, VTTM NO. 74112 Hearing Notice (Sept. 16, 2016) ["September 16, 2016 Hearing Notice"]; see also Initial Study/MND, p. 1.) The application for a GPA serves as an admission that the Proposed Project is inconsistent with the existing General Plan designation—if the Project were consistent with the General Plan, no such amendment would be necessary. (See MND at IV-61: "Upon approval of the General Plan amendment and zone change . . . the Project would be consistent with the zoning and Community Plan's land use designation and the zoning.") The Central City North Community Plan identifies "the intrusion of commercial and residential uses into previously industrial areas" as one of the three primary issues facing industrially zoned land. (Central City North Community Plan, p. I-7.) Approval of this VTT and Project would perpetuate the intrusion of commercial and residential uses into industrial land. (See Initial Study/MND, p. IV-58.) Thus, approval of the VTT is contrary to the Central City North Community Plan.

The VTT is also inconsistent with the General Plan Framework Element, which states that City policy is to "[r]etain the current manufacturing and industrial land use designations… to provide adequate quantities of land for emerging industrial sectors." (Los Angeles General Plan

Framework Policy 7.2.8.)[1] City policy also seeks to "[l]imit the redesignation of existing industrial land to other land uses." (*Id.* Policy 7.2.9.) These policies support the City's objective to "actively ensure that the City has sufficient quantities of land suitable to accommodate… industrial firms." (Los Angeles Department of City Planning and Community Redevelopment Agency, *Los Angeles' Industrial Land: Sustaining a Dynamic City Economy* (Dec. 2007) ["*LA Industrial Land*"], p. 3 (excerpt attached as Exhibit 1/Tab 4);[2] see General Plan Framework section 7.2 *et seq.*) The General Plan Framework only permits conversion of industrial land to non-industrial uses "[w]here it can be demonstrated that the reduction of industrial lands will not adversely impact the City's ability to accommodate sufficient industrial uses to provide jobs for the City's residents or incur adverse fiscal impacts." (General Plan Framework Policy 13.4.6.) The City's overarching goal is to limit conversion of existing industrial land to other land uses to avoid creating "a fragmented pattern of development [that] reduces the integrity and viability of existing industrial areas." (*Ibid.*) This is an important policy goal because only 8 percent of Los Angeles' land is designated for industrial uses, a quarter of which has already been converted to non-industrial purposes. (LA *Industrial Land*, p. 10).

If approved, the Proposed Project would undermine City policies to retain industrially zoned land. It would convert industrial land to commercial zoning in direct conflict with Policy 7.2.9's mandate to "[l]imit the redesignation of existing industrial land to other land uses." The Proposed Project fails to "[r]etain the current manufacturing and industrial land use designations," as required by Policy 7.2.8. There is no record evidence showing that the resulting reduction of industrial land due to approval of the VTT and planned development would not adversely impact the City's ability to accommodate sufficient industrial uses to provide employment for the City's residents or result in negative financial impacts.

Moreover, subdivision of the project site into one master/ground lot and thirteen airspace lots is likely to contribute to the permanent conversion of the land to non-industrial use. (Case Number ENV-2013-2994-MND, CPC-2013-2993-GPA-VZC-HD-MCUP-ZAA-MSC-SPR, VTTM

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[1] Chapter 7 of the Los Angeles General Plan Framework is available online at: http://cityplanning.lacity.org/cwd/framwk/chapters/07/07.htm [as of Jan. 16, 2017]. See also Chapter 4 of the Framework ("It is the intent of the General Plan Framework Element to preserve industrial lands for the retention and expansion of existing and attraction of new industrial uses that provide job opportunities for the City's residents."), available at: http://cityplanning.lacity.org/cwd/framwk/chapters/03/03209.htm.

[2] Available at: http://planning.lacity.org/Code_Studies/LanduseProj/Industrial_Files/Attachment%20B.pdf [as of Jan. 16, 2017].

NO. 74112 Hearing Notice (Dec. 14, 2016) ["December 14, 2016 Hearing Notice"], p. 1; Initial Study/MND, p. II-1.) Individuals or entities may obtain separate ownership interests in each of these lots. If this ownership fragmentation occurs it will be virtually impossible to re-consolidate the lots to allow for future industrial uses. The Project would create 344 individual live/work units. (See City of Los Angeles Subdivider's Statement for Case Number ENV-2013-2994-MND, CPC-2013-2993-GPA-VZC-HD-MCUP-ZAA-MSC-SPR, VTTM NO. 74112 ["Subdivider's Statement"], p. 1.) The record does not disclose whether these live/work units might subsequently be sold to individual owners. (See generally Subdivider's Statement; December 14, 2016 Hearing Notice; Initial Study/MND.) If individual owners purchase these units, such fractionalized ownership would be a major impediment to industrial reversion. If the Planning Commission upholds the DAA's approval, the Project would irreparably alter the industrial nature of these lots, and therefore undermine the General Plan Framework's Policies of preserving industrial land.

IV. Several Requested Project Entitlements Are Impermissible or Unlawful.

A. A General Plan Amendment is not an available entitlement for the Project under Los Angeles City Charter Section 555.

The Proposed Project does not conform to the current General Plan. (Compare Initial Study/MND, p. IV-61 with Central City North Community Plan; see also Section III.B, above.) Rather than proposing a project that conforms to the existing General Plan, the Applicant has requested a General Plan Amendment to change the project site's land use designation. (September 16, 2016 Hearing Notice; see Initial Study/MND.) A GPA is not an available entitlement for the Project, however, as approval of a GPA in this case would violate the Los Angeles City Charter.

A Charter City must comply with all provisions of its City Charter. The Charter serves as the City's Constitution. "[T]he charter represents the supreme law of the City, subject only to conflicting provisions in the federal and state constitutions and to preemptive state law." (*San Diego City Firefighters, Local 145, AFL-CIO v. Board of Admin. of San Diego City Employees' Retirement System* (2012) 206 Cal.App.4th 594, 608 ["*San Diego*"] (internal quotation marks omitted).) A "charter city may not act in conflict with its charter . . . any act that is violative of or not in compliance with the charter is void." (*Ibid.*, citing *Domar Electric, Inc. v. City of Los Angeles* (1994) 9 Cal.4th 161, 171.)

Section 555(a) provides that the General Plan may only be amended "in its entirety, by subject elements or parts of subject elements, or by geographic areas, provided that the part or area

involved has *significant social, economic, or physical identity.*" (City Charter, § 555(a).) This charter provision provides consistent, comprehensive land use planning for the City. The Applicant has not requested that the General Plan be amended in its entirety or by subject elements, such as housing, transportation, etc. (See 1525 Industrial Street Camden Industrial Lofts Project Requested Entitlements Actions (May 6, 2016) ["Requested Entitlements Actions"], pp. 1-3.) Nor has the Applicant requested that the General Plan be amended for a specific geographic area that has significant social, economic, or physical identity. (*Ibid.*) 1525 Industrial Street cannot be said to possess its own significant social, economic, or physical identity – it is merely comprised of two parcels within a broader neighborhood sharing geographic, social, economic, and physical qualities. (See December 14, 2016 Hearing Notice, p. 1; Initial Study/MND, pp. II-1-10.) A GPA that applied only to the Project site would therefore violate City Charter Section 555, since it would amend the General Plan specifically to benefit a single development site for a lone developer. Los Angeles City Charter section 555(a) thus prohibits the City from approving the GPA to benefit this single project.

Approval of the GPA would also violate City Charter section 555(b) ("Section 555(b)") and Los Angeles Municipal Code section 11.5.6. Under Section 555(b), only "[t]he Council, the City Planning Commission or the Director of Planning may propose amendments to the General Plan." LAMC section 11.5.6 states "an amendment to the General Plan may be initiated by the Council, the City Planning Commission or the Director of Planning." Initiation of a General Plan amendment by anyone other than the "Council, the City Planning Commission or the Director of Planning," including a landowner, violates the Charter, and is therefore void. (See City Charter § 555(b); *San Diego City Firefighters, supra,* 206 Cal.App.4th at 608.) Under Section 555(b) and LAMC section 11.5.6, a landowner may not request any amendment to the General Plan. It cannot be disputed that the developer, and not the Council, Planning Commission, or Director of Planning, initiated the instant GPA request. (See Master Land Use Planning Application ["MLUPA"] for the project, p.2, signed April 29, 2016; revised MLUPA, p.2, May 6, 2016.; see also Request for Initiation of an Amendment to the City's General Plan, May 6, 2016.)

The City may not approve the Applicant's request for a GPA to benefit the Proposed Project. Such an action would violate the City Charter and would be void under California law. (See *San Diego City Firefighters,* 206 Cal.App.4th at 608.)

B. The requested Zone Change is not an available entitlement for the Project because it conflicts with the current General Plan.

The Applicant's request for a zone change is likewise unlawful because zone changes must be consistent with *existing* General Plan requirements. Though a landowner may apply for a zone change under the Charter, the zone change must be consistent with the current General Plan. (City Charter, § 558.) The Charter states "an ordinance, order or resolution [to change any zones or regarding zoning regulations] may be proposed . . . by application of the owner of the affected property if authorized by ordinance." (*Id.* [§§ 558(a)(1)(2), 558(b)(1)].) If a landowner requests a zone change, the Planning Commission is required to ensure that the action is consistent with *existing* requirements imposed by the General Plan. (See *id.* [§ 558(b)(2)].) It must make a "recommendation regarding the relation of the proposed ordinance, order or resolution to the General Plan." (*Ibid.*) A landowner may not request amendments to the General Plan in order to mold the General Plan to a requested zone change. (Compare City Charter § 558 with City Charter § 555; see LAMC, § 12.32.)

C. The requested Zoning Administrator's Adjustment is not an available entitlement for the Project because it violates City Charter Section 562.

An additional entitlement sought by the project that is not available is a Zoning Administrator's ("ZA") Adjustment to permit a variable width (0 to 3.5 feet) side yard setback in lieu of the ordinarily permitted 10 feet. This entitlement is unavailable because the municipal code's grant of authority providing for such an adjustment, found in Municipal Code Section 12.28, is invalid. (See *Kottler v. City of Los Angeles*, Los Angeles Superior Court case no. BS 154184 [appeal pending], attached as Exhibit 2/Tab 5.) In *Kottler*, the Court found that granting a variance via the City's Zoning Administrator adjustment process (see LAMC section 12.28) violates Charter section 562, because the enumerated Charter findings for variances are not required for adjustments. Here, as in the *Kottler* case, the City has not provided the requisite variance findings to allow a departure from the otherwise applicable code provision.

The Central City North Community Plan identifies consistent setbacks as desired, but similarly provides no authority for reduced setbacks. Nor does its Design Guidelines recommend them. (See Central City North Community Plan, § V.) "Zoning, specific plans and other discretionary approvals . . . are implementing tools of the general plan." (Los Angeles General Plan Framework Chapter 1.)[3] Approval of the Project as currently designed and as proposed to be entitled would violate Charter section 562, and thus also the Subdivision Map Act, which requires

[3] Available at: http://planning.lacity.org/cwd/framwk/chapters/01/01.htm [as of Jan. 16, 2017].

that proposed developments for which map approval is sought conform to the City's General Plan. (See Gov. Code § 66474.61(b) [requiring the "design or improvement of the proposed subdivision [be] consistent with applicable general and specific plans"], see discussion, Part II, above.)

V. The Subdivision Map Act Findings are Inaccurate and Do Not Support Approval of the Vesting Tentative Tract Map.

The Subdivision Map Act requires denial of a tentative tract map if any one of a number of findings is made. Stated another way, "a local agency may approve a tentative map only if none of the findings can be made." (California Land Use Practice (Cal CEB 2016), § 9.76-77.) So-called *Topanga* findings, in other words, findings that bridge the analytic gap between the raw evidence and the local agency's decision, are required to support approval or denial. (See Govt. Code, §§ 66473.5, 66474; *Woodland Hills Residents Assn., Inc. v. City Council* (1975) 44 Cal.App.3d 825, 837-38 (citing *Topanga Assn. For A Scenic Community* v. *County of Los Angeles*, 11 Cal.3d 506).) The DAA's Decision approving the VTT includes findings that are inaccurate or otherwise do not support approval of the VTT. (Decision, pp. 20-24.)

The DAA finds the proposed map is consistent with applicable general and specific plans. (Decision, SMA Finding of Fact "a", p. 20.) As discussed at length above in Sections III.B, and as acknowledged by the approval (see Decision, p. 21), the VTT and Proposed Project are not consistent with the existing General Plan. The Decision and finding admit that only upon approval of the General Plan and zone change will the proposed map be consistent with the General Plan and zoning ordinance. As discussed in Sections IV.A and IV.B of this appeal, neither the proposed GPA nor the zone change are permissible entitlements for the Proposed Project, and thus the claim of consistency with the applicable General and Specific Plan is incorrect. The VTT and Proposed Project are inconsistent with the General Plan, and the City may not alter the General Plan in order to make it conform to the project.

Similarly, finding "b" relates to the design or improvement of the proposed subdivision, and requires consistency with the applicable general and specific plans. (Decision, p. 21).
The DAA states that "as conditioned, the proposed tract map is consistent with the intent and purpose of the applicable General and Specific Plans." (*Ibid.*) As above, this is inaccurate, as the finding presumes the availability of both the GPA and Zone Change, and in addition, that the requested Zoning Administrator Adjustment to reduce project setbacks is permissible. As discussed

above in Sections IV.A, IV.B, and IV.C, none of these entitlements are permissible for the Proposed Project, and thus finding "b" is likewise incorrect and does not support approval of the VTT.

Finding "d", relating to the suitable density of development for the Proposed Project, also assumes, incorrectly, that the GPA and Zone Change are permissible and that therefore the project site is physically suitable. (Decision, p. 22.)

The above mandatory Subdivision Map Act findings are based on inaccurate facts and do not support approval of the VTT. Aproval of the VTT thus constitutes an abuse of discretion.

VI. The California Environmental Quality Act Requires That the City Complete an Environmental Impact Report for the VTT and Proposed Project.

CEQA "requires the preparation of an EIR whenever it can be fairly argued on the basis of substantial evidence that the project may have a significant environmental impact." (*No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75, supplemented (1975) 13 Cal.3d 486; Cal. Code Regs., tit. 14, ["CEQA Guidelines"] § 15064; see Pub. Resources Code, § 21002.1.) The "fair argument" standard sets "a low threshold requirement for initial preparation of an EIR and reflects a preference for resolving doubts in favor of environmental review." (*Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th 1307, 1316–17.)

The Proposed Project would result in significant impacts because it is incompatible and inconsistent with existing land use requirements. The Los Angeles CEQA Thresholds Guide ("CEQA Thresholds Guide") states that a Project may have a potentially significant impact if the Project "is inconsistent with the General Plan or adopted…goals and policies contained in other applicable plans." (See CEQA Thresholds Guide, H.1-2 (excerpt attached as Exhibit 3/Tab 6); see CEQA Guidelines, § 15064.7.) Furthermore, an important factor in determining whether a project has a significant impact is whether the project impacts land use in a particular area or disrupts existing land uses. (*Id.* at H.2-3.) As discussed above, the Proposed Project is inconsistent with both the Central City North Community Plan – a subset of the General Plan – and the General Plan Framework. (See Initial Study/MND, pp. 1, IV-61; General Plan Framework Policies 7.2.8, 7.2.9; Section III.B, above.) In addition, approval of the Project would disrupt industrial land designations. (See *ibid.*; Subdivider's Study, p. 1.) The land is currently zoned M3-1-RIO, which provides for industrial uses, but prohibits residential use. (Initial Study/MND, p. IV-62.) The Project is incompatible with this designation, as it seeks to develop 344 residential live/work units. (*Ibid.*)

Further, due to the proposed fragmentation of ownership of the Property into thirteen airspace lots, the Property will likely never revert to large-scale industrial use, and approval of the Project would result in indefinite disruption of industrial land. (See Subdivider's Study, p. 1; Section III.B.) For these reasons, the Project would undermine the City's policy of preserving industrial land. (See *LA Industrial Land*; Section III.B.) Under the CEQA Thresholds Guide, therefore, the Project will have potentially significant impacts, which exceeds the "fair argument" standard and requires preparation of an EIR. The City thus may not approve the Project with only a Mitigated Negative Declaration.

While the MND notes General Plan and zoning inconsistencies, it seeks to resolve those inconsistencies through a General Plan Amendment and zone change. With approval of those entitlements, the MND asserts, "the Proposed Project would conform to the zoning and Central City North Community Plan." (See Initial Study/MND, pp. 1, IV-60.) Without these entitlements the land use impacts would necessarily be significant and unavoidable. (MND at IV-59, IV-61.) The crux of the CEQA problem is that a General Plan Amendment is not an available entitlement for the Proposed Project, and thus there is no mitigation available to address the "adverse environmental effects of the Project, which the General Plan and zoning ordinance are designed to avoid or mitigate." (*Ibid;* see Section IV.A.) If the City does not grant the General Plan Amendment, the adverse land use impact exceeds the "fair argument" standard, requiring an EIR. But if the City grants the GPA, it necessarily violates the City Charter to do so and thus abuses its discretion.

Finally, the Initial Study and MND entirely fail to analyze the project for its creation of a "spot" zone. As defined by the City, "[a] 'spot' zone occurs when the zoning or land use designation for only a portion of a block changes, or a single zone or land use designation becomes surrounded by more or less intensive land uses." (CEQA Thresholds Guide, H.2-2 [Exh. 3/Tab 6].) This is consonant with California law: "A spot zone results when a small parcel of land is subject to . . . *less* restrictive zoning than surrounding properties." (*Foothill Communities Coalition v. County of Orange* (2014) 222 Cal.App.4th 1302, 1312, 1314, review denied (Apr. 30, 2014) (emphasis added).) If approved, the Proposed Project would create a small island of C2 zoning in a sea of M3 zoning. (MND IV-59–IV-62; see also VTT 74112, attached as Exhibit 4/Tab 7.) The City's CEQA Threshold Guide requires that where a spot zone would result, the environmental review for the project requires further study. (Thresholds Guide, H.2-2.) The significance threshold is "made on a

case-by-case basis" and considers the "extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area" and the "number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the project." (*Id.* at H.2-3.) The City's General Plan Amendment process, which violates the City Charter by allowing an applicant to initiate a GPA (see discussion, supra, Section IV.A), also acknowledges that a GPA request may introduce a spot zone. (Request for Initiation of an Amendment to the City's General Plan, May 6, 2016.)

Here, the MND fails even to identify that the project would create a spot zone, and thus entirely fails to consider the potentially significant land use and other adverse environmental impacts due to creation of the spot zone. The City's failure to thoroughly analyze potentially significant impacts does not shield it from "its own failure to gather relevant data . . . . If the local agency has failed to study an area of possible environmental impact, a fair argument may be based on the limited facts in the record." (*Sundstrom v. County of Medocino*, 202 Cal. App. 3d 296, 311 (1988). Furthermore, introduction of a spot zone at present is particularly offensive and undermines the ongoing community plan update process for the Central City North Community Plan. (See City of Los Angeles, *DTLA 2040*, available online at: http://www.dtla2040.org.)

VII. In Approving the VTT, the City Violated Aggrieved Parties' Due Process Rights and Did Not Appropriately Consider Public Comments.

Appellants object to public hearing comments made both by the Applicant and by a member of the DAA panel suggesting that DAA review during the VTT approval process is merely technical and consideration of the numerous objections to the VTT application raised by members of the public should be deferred to the City Planning Commission to be heard on appeal when it considers the related development application. These comments, especially those made by a member of the DAA panel, implicate serious due process concerns.

Basic due process rights in the administrative land use process minimally include reasonable notice and an opportunity to be heard. (*Mohilef v. Janovici* (1996) 51 Cal.App.4th 267.) Holding a properly noticed public hearing is, by itself, insufficient to satisfy due process requirements. The opportunity to be heard must be meaningful, and requires that "whenever due process requires a hearing, the adjudicator must be impartial." (*Today's Fresh Start, Inc. v. Los Angeles County Office of Education* (2013) 57 Cal.4th 197, 212 (quoting *Haas v. County of San Bernardino* (2002) 27 Cal.4th 1017,

1025)(internal quotation marks omitted).) The DAA panel member's comment that because there is a separate and later legislative process in place to consider land use issues that the Subdivision Map Act approval hearing is merely for technical map considerations is in error, and indicates that the panel members did not provide an impartial hearing.

The issues raised at the public hearing and discussed above were properly before the DAA. The DAA was required to give their expert consideration of the technical Subdivision Map Act ramifications of all arguments raised at the DAA hearing. Particularly where the DAA Decision does not mention stakeholder objections, there is no way for the public to know whether their concerns were even considered, or if the DAA simply deferred these issues to be considered for the first time on appeal. Either way, this evinces a lack of impartiality on the part of the DAA. A hearing before a panel that was not impartial in the approval process was fundamentally unfair and denied Appellants of their due process rights.

Moreover, while the VTT approval may not commit the City to a particular course of action with respect to the related land use applications, if the DAA did not properly consider community member objections about the validity of the VTT apart from the development application, the appellate body will likely issue a decision on appeal that is merely a post-hoc rationalization for an action already taken. (See *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116, 130.) This is especially the case where, as here, the land use impacts of the VTT application were not adequately analyzed in the project MND. (See Section VI, supra).

VIII. Conclusion

For all the reasons discussed above, ADCCLA and Mr. Bar-Zemer urge the Planning Commission to overturn the Deputy Advisory Agency's approval of the Vesting Tentative Tract Map for the Proposed Project, order the City to complete an Environmental Impact Report, and deny all other requested approvals for the Proposed Project.

DEPARTMENT OF
CITY PLANNING

CITY PLANNING COMMISSION

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Decision Date: January 05, 2017

Last Day to Appeal: January 17, 2017

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RE: Vesting Tentative Tract No. VTT-74112
Related Case: CPC-2013-2993-GPA-VZC-HD-MCUP-ZAA-MSC-SPR
1525 East Industrial Street
Central City North Planning Area
Zone: M3-1-RIO
District Map: 124 5A 215
Council District: 14
CEQA No.: ENV-2013-2994-MND
Legal Description: Lot FR G, Industrial Tract

In accordance with provisions of Section 17.03 of the Los Angeles Municipal Code (LAMC), the Advisory Agency adopted (Mitigated) Negative Declaration ENV-2013-2994-MND as the environmental clearance, adopted the Mitigation Monitoring Program, and approved Vesting Tentative Tract No. 74112 composed of 14 lots (one master ground lot and 13 airspace lots), located at 1525 East Industrial Street for a maximum **344 live-work units and 29,544 square feet of commercial space,** as shown on map stamp-dated May 6, 2016 in the Central City North Community Plan. (Verification should be obtained from the Department of Building and Safety which will legally interpret the Zoning Code as it applies to this particular property.) The Advisory Agency's approval is subject to the following conditions:

NOTE on clearing conditions: When two or more **agencies** must clear a condition, subdivider should follow the sequence indicated in the condition. For the benefit of the applicant, subdivider shall maintain record of all conditions cleared, including all material supporting clearances and be prepared to present copies of the clearances to each reviewing agency as may be required by its staff at the time of its review.

c. Provide a copy of the case PMEX-4036. Show compliance with all the conditions/requirements of the case as applicable.

d. Zone Change must be recorded prior to obtaining Zoning clearance.

e. Show all street dedication(s) as required by Bureau of Engineering and provide net lot area after all dedication. "Area" requirements shall be re-checked as per net lot area after street/alley dedication. Front, side and rear yard requirements shall be required to comply with current code as measured from new property lines after dedication(s).

f. The submitted map does not comply with the maximum density (400 s.f. of lot area/dwelling unit) requirement for the proposed C2 Zone. Revise the map to show compliance with the above requirement based on the lot area after required street dedication is taken or obtain approval from the Department of City Planning.

g. Provide and record a Covenant and Agreement (affidavit) regarding Maintenance of Building on Air Space Lots. Provide Metes and Bounds to establish and identify the boundaries of the parcel with the correct legal description.

Notes:

This property is located in River Improvement Overlay District, ZI-2358.

This property is located in Transit Priority Area in the City of Los Angeles, ZI-2452.

This property is located in a Methane Buffer Zone.

The proposed building plans have not been checked for and shall comply with Building and Zoning Code requirements. With the exception of revised health or safety standards, the subdivider shall have a vested right to proceed with the proposed development in substantial compliance with the ordinances, policies, and standards in effect at the time the subdivision application was deemed complete. Plan check will be required before any construction, occupancy or change of use.

If the proposed development does not comply with the current Zoning Code, all zoning violations shall be indicated on the Map.

An appointment is required for the issuance of a clearance letter from the Department of Building and Safety. The applicant is asked to contact John Francia at (213) 482-0010 to schedule an appointment.

DEPARTMENT OF TRANSPORTATION

8. That the project be subject to any recommendations from the Department of Transportation.

within 50ft visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department.

m. Where rescue window access is required, provide conditions and improvements necessary to meet accessibility standards as determined by the Los Angeles Fire Department.

n. Policy Exception – L.A.M.C. 57.09.03.B Exception:

(1) When this exception is applied to a fully fire sprinklered residential building equipped with a wet standpipe outlet inside an exit stairway with at least a 2 hour rating the distance from the wet standpipe outlet in the stairway to the entry door of any dwelling unit or guest room shall not exceed 150 feet of horizontal travel AND the distance from the edge of the roadway of an improved street or approved fire lane to the door into the same exit stairway directly from outside the building shall not exceed 150 feet of horizontal travel.

(2) It is the intent of this policy that in no case will the maximum travel distance exceed 150 feet inside the structure and 150 feet outside the structure. The term "horizontal travel" refers to the actual path of travel to be taken by a person responding to an emergency in the building.

(3) This policy does not apply to single-family dwellings or to non-residential buildings.

o. The Fire Department may require additional roof access via parapet access roof ladders where buildings exceed 28 feet in height, and when overhead wires or other obstructions block aerial ladder access.

p. Adequate public and private fire hydrants shall be required.

q. Each standpipe in a new high-rise building shall be provided with two remotely located FDC's for each zone in compliance with NFPA 14-2013, Section 7.12.2.

r. Recently, the Los Angeles Fire Department (LAFD) modified Fire Prevention Bureau (FPB) Requirement 10. Helicopter landing pads are still required on all High-Rise buildings in the City. However, FPB's Requirement 10 has been revised to provide two new alternatives to a full FAA-approved helicopter landing pad.

s. SECTION 510 - EMERGENCY RESPONDER RADIO COVERAGE

5101.1 Emergency responder radio coverage in new buildings. All new buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety communication systems of the jurisdiction at the exterior of the

BUREAU OF STREET LIGHTING – SPECIFIC CONDITIONS

12. Street Lighting clearance for this Street Light Maintenance Assessment District condition is conducted at 1149 S. Broadway Suite 200. Street Lighting improvement condition clearance will be conducted at the Bureau of Engineering District office, see condition S-3. (c).

    Prior to the recordation of the final map or issuance of the Certificate of Occupancy (C of O), street lighting improvement plans shall be submitted for review and the owner shall provide a good faith effort via a ballot process for the formation or annexation of the property within the boundary of the development into a Street Lighting Maintenance Assessment District.

BUREAU OF SANITATION

13. Satisfactory arrangements shall be made with the Bureau of Sanitation, Wastewater Collection Systems Division for compliance with its sewer system review and requirements. Upon compliance with its conditions and requirements, the Bureau of Sanitation, Wastewater Collection Systems Division will forward the necessary clearances to the Bureau of Engineering. (This condition shall be deemed cleared at the time the City Engineer clears Condition No. S-1. (d).)

DEPARTMENT OF CITY PLANNING – SITE SPECIFIC CONDITIONS

14. Prior to the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:

    a. Limit the proposed development to a maximum of 344 live-work units and 29,544 square feet of commercial floor area.

    b. Residential parking shall be provided per LAMC Section 12.22-A.25(d). Commercial parking shall be provided per LAMC Section 12.21-A.4(x)(3).

       In addition, prior to issuance of a building permit, a parking plan showing off-street parking spaces, as required by the Advisory Agency, be submitted for review and approval by the Department of City Planning (201 N. Figueroa Street, 4th Floor).

    c. **Note to City Zoning Engineer and Plan Check.** The Advisory Agency has approved the following variations from the Los Angeles Municipal Code as it applies to this subdivision and the proposed development on the site.

       Not Applicable

    d. The applicant shall install an air filtration system(s) to reduce the effects of diminished air quality on occupants of the project.

reasonable time, of if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Action includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

15. That prior to the issuance of the building permit or the recordation of the final map, a copy of Case No. CPC-2013-2993-GPA-VZC-HD-MCUP-ZAA-MSC-SPR shall be submitted to the satisfaction of the Advisory Agency. In the event that Case No. CPC-2013-2993-GPA-VZC-HD-MCUP-ZAA-MSC-SPR is not approved, the subdivider shall submit a tract modification.

DEPARTMENT OF CITY PLANNING - ENVIRONMENTAL MITIGATION MEASURES

16. That prior to recordation of the final map the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770 and Exhibit CP-6770. in a manner satisfactory to the Planning Department requiring the subdivider to identify (a) mitigation monitor(s) who shall provide periodic status reports on the implementation of mitigation items required by Mitigation **Condition Nos. 17 and 18** of the Tract's approval satisfactory to the Advisory Agency. The mitigation monitor(s) shall be identified as to their areas of responsibility, and phase of intervention (pre-construction, construction, postconstruction/ maintenance) to ensure continued implementation of the above mentioned mitigation items.

17. Prior to the recordation of the final map, the subdivider will prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a

MM-6. The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features:

a. Fire lanes, where required, shall be a minimum of 20 feet in width;

b. All structures must be within 300 feet of an approved fire hydrant; and

c. Entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

MM-7. Prior to plan check review, the Project Applicant shall consult with the Los Angeles Fire Department regarding the installation of public and/or private fire hydrants, sprinklers, access, and/or other fire protection features within the Project. All required fire protection features shall be installed to the satisfaction of the Los Angeles Fire Department.

MM-8. The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

MM-9. In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:

a. Weather-based irrigation controller with rain shutoff.

b. Matched precipitation (flow) rates for sprinkler heads.

c. Drip/microspray/subsurface irrigation where appropriate.

18. **Construction Mitigation Conditions** - Prior to the issuance of a grading or building permit, or the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:

CM-1. That a sign be required on site clearly stating a contact/complaint telephone number that provides contact to a live voice, not a recording or voice mail, during all hours of construction, the construction site address, and the tract map number. YOU ARE REQUIRED TO POST THE SIGN 7 DAYS BEFORE CONSTRUCTION IS TO BEGIN.

a. Locate the sign in a conspicuous place on the subject site or structure if developed) so that it can be easily read by the public. The sign must be sturdily attached to a wooden post if it will be free-standing.

b. Regardless of who posts the site, it is always the responsibility of the applicant to assure that the notice is firmly attached, legible, and remains in that condition throughout the entire construction period.

c. If the case involves more than one street frontage, post a sign on each street frontage involved. If a site exceeds five (5) acres in size, a separate notice of posting will be required for each five (5) acres, or portion thereof. Each sign must be posted in a prominent location.

CM-2. A construction contingency plan for dealing with both anticipated and potential occurrences of environmentally sensitive situations during site redevelopment shall be established and adhered to during construction.

CM-3. Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday and national holidays.

CM-4. Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

CM-5. All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices.

CM-6. Noise and groundborne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, and natural and/or manmade barriers

accordance with Section 17.12 of the LAMC and to be paid and deposited in the trust accounts of the Park and Recreation Fund.

LW-2. That a landscape plan, prepared by a licensed landscape architect, be submitted to and approved by the Advisory Agency in accordance with CP-6730 prior to obtaining any permit. The landscape plan shall identify tree replacement on a 1:1 basis by a minimum of 24-inch box trees for the unavoidable loss of desirable trees on the site. Failure to comply with this condition as written shall require the filing of a modification to this tract map in order to clear the condition.

In the event the subdivider decides not to request a permit before the recordation of the final map, the following statement shall appear on the plan and be recorded as a covenant and agreement satisfactory to the Advisory Agency guaranteeing that:

a. The planting and irrigation system shall be completed by the developer/builder prior to the close of escrow of 50 percent of the units of the project or phase.

b. Sixty days after landscape and irrigation installation, the landscape professional shall submit to the homeowners/property owners association a Certificate of Substantial Completion (Sec. 12.40 G LAMC.)

c. The developer/builder shall maintain the landscaping and irrigation for 60 days after completion of the landscape and irrigation installation.

d. The developer/builder shall guarantee all trees and irrigation for a period of six months and all other plants for a period of 60 days after landscape and irrigation installation.

LW-3. In order to expedite the development, the applicant may apply for a building permit for a joint living and work building. However, prior to issuance of a building permit for joint living and work units, the registered civil engineer, architect or licensed land surveyor shall certify in a letter to the Advisory Agency that all applicable tract conditions affecting the physical design of the building and/or site, have been included into the building plans. Such letter is sufficient to clear this condition. In addition, all of the applicable tract conditions shall be stated in full on the building plans and a copy of the plans shall be reviewed and approved by the Advisory Agency prior to submittal to the Department of Building and Safety for a building permit.

OR

If a building permit for joint living and work units will not be requested, the project civil engineer, architect or licensed land surveyor must certify in a letter to the Advisory Agency that the applicant will not request a permit for a joint living and work building and intends to acquire a building permit for a joint living and work condominium building. Such letter is sufficient to clear this condition.

(i) That 1-foot future streets and/or alleys be shown along the outside of incomplete public dedications and across the termini of all dedications abutting unsubdivided property. The 1-foot dedications on the map shall include a restriction against their use of access purposes until such time as they are accepted for public use.

(j) That any 1-foot future street and/or alley adjoining the tract be dedicated for public use by the tract, or that a suitable resolution of acceptance be transmitted to the City Council with the final map.

(k) That no public street grade exceeds 15%.

(l) That any necessary additional street dedications be provided to comply with the Americans with Disabilities Act (ADA) of 1990.

S-2. That the following provisions be accomplished in conformity with the improvements constructed herein:

(a) Survey monuments shall be placed and permanently referenced to the satisfaction of the City Engineer. A set of approved field notes shall be furnished, or such work shall be suitably guaranteed, except where the setting of boundary monuments requires that other procedures be followed.

(b) Make satisfactory arrangements with the Department of Traffic with respect to street name, warning, regulatory and guide signs.

(c) All grading done on private property outside the tract boundaries in connection with public improvements shall be performed within dedicated slope easements or by grants of satisfactory rights of entry by the affected property owners.

(d) All improvements within public streets, private streets, alleys and easements shall be constructed under permit in conformity with plans and specifications approved by the Bureau of Engineering.

(e) Any required bonded sewer fees shall be paid prior to recordation of the final map.

S-3. That the following improvements be either constructed prior to recordation of the final map or that the construction be suitably guaranteed:

(a) Construct on-site sewers to serve the tract as determined by the City Engineer.

(b) Construct any necessary drainage facilities.

(c) Install street lighting facilities to serve the tract as required by the Bureau of Street Lighting.

a. Construct one new street light on Alameda Street.

(4) Relocation of the existing catch basin along Alameda Street satisfactory to the City Engineer.

b. Improve Industrial Street and Mills Street being dedicated and adjoining the tract by the construction of additional concrete sidewalks within the newly dedicated areas to complete full-width concrete sidewalks with tree wells including any necessary removal and reconstruction of the existing improvements satisfactory to the City Engineer.

NOTES:

The Advisory Agency approval is the maximum number of units permitted under the tract action. However the existing or proposed zoning may not permit this number of units. This vesting map does not constitute approval of any variations from the Los Angeles Municipal Code (LAMC), unless approved specifically for this project under separate conditions.

Any removal of the existing street trees shall require Board of Public Works approval.

Satisfactory arrangements shall be made with the Los Angeles Department of Water and Power, Power System, to pay for removal, relocation, replacement or adjustment of power facilities due to this development. The subdivider must make arrangements for the underground installation of all new utility lines in conformance with Section 17.05-N of the LAMC.

The final map must be recorded within 36 months of this approval, unless a time extension is granted before the end of such period.

The Advisory Agency hereby finds that this tract conforms to the California Water Code, as required by the Subdivision Map Act.

The subdivider should consult the Department of Water and Power to obtain energy saving design features which can be incorporated into the final building plans for the subject development. As part of the Total Energy Management Program of the Department of Water and Power, this no-cost consultation service will be provided to the subdivider upon his request.

FINDINGS OF FACT (CEQA)

The project was issued Mitigated Negative Declaration ENV-2013-2994-MND on July 18, 2016. Potential negative impacts could occur from the project's implementation due to:

Hazardous Materials Site
Land Use / Planning
Increased Noise Levels (Demolition, Grading, and Construction Activities)
Increased Noise Levels (Mixed-Use Development)
Increased Noise Levels (Parking Structure Ramps)
Public Services (Fire Protection)
Public Services (Police – Demolition / Construction Sites)

Change / Height District Change (Condition No. 15). The project also proposes a ministerial density bonus to increase their base density from 282 units to 344 units.

Residential parking will be provided per the ministerial density bonus parking requirements stated in LAMC Section 12.22-A.25(d). The project will provide 397 resident parking spaces and 80 guest parking spaces for the 344 live-work apartment units.

The project site is located within the Los Angeles State Enterprise zone. Per LAMC 12.21-A.4(x)(3), areas within any Enterprise Zone only need to provide two parking spaces for every 1,000 square feet of commercial space. Based on this requirement, the 29,544 square foot site is required to provide 59 commercial parking spaces.

The project will include 394 on-site bicycle parking spaces, meeting requirements of the Bicycle Ordinance (Ordinance No. 182,386). The live-work units require 379 bicycle parking spaces, including 35 short-term and 344 long-term spaces. The commercial area requires 14 bicycle parking spaces, including 6 short-term and 8 long-term spaces.

Therefore, the proposed map will be consistent with the applicable General Plan upon approval of the General Plan Amendment and the Zone Change.

(b) THE DESIGN OR IMPROVEMENT OF THE PROPOSED SUBDIVISION IS CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

The Bureau of Engineering has reviewed the proposed subdivision and found the subdivision layout generally satisfactory and that there are existing sewers in the streets adjoining the subdivision. As a condition of approval, the subdivider is required to make dedications and improvements on Industrial Street, Alameda Street and Mill Street in order to meet current street standards. The Bureau of Street Lighting has also reviewed the proposed subdivision and has conditioned the subdivision approval to construct new street lights on Industrial Street, Alameda Street and Mill Street in order to meet current street lighting standards. This tract will connect to the public sewer system and will not result in violation of the California Water Code. The Bureau of Sanitation reviewed the sewer/storm drain lines serving the proposed subdivision and found no potential problems to their structures or potential maintenance problems.

Therefore, as conditioned, the proposed tract map is consistent with the intent and purpose of the applicable General and Specific Plans.

(c) THE SITE IS PHYSICALLY SUITABLE FOR THE TYPE OF DEVELOPMENT.

The site is level and is not located in a slope stability study area, high erosion hazard area, or a fault-rupture study zone. The Department of Building and Safety, Grading Division, has tentatively approved the tract map without conditions.

The project is also served by the Metro Gold Line rail system located at the Little Tokyo/Arts District station near 1st Street and Alameda Street. The Metro Gold Line offers service to East Los Angeles to the east and Pasadena to the northeast. The Metro Gold Line connects to Union Station, providing access to Metrolink, the Metro Silver Bus Line, and Metro Rail Red and Purple Lines.

(e) THE DESIGN OF THE SUBDIVISION OR THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SUBSTANTIAL ENVIRONMENTAL DAMAGE OR SUBSTANTIALLY AND AVOIDABLY INJURE FISH OR WILDLIFE OR THEIR HABITAT.

The Deputy Advisory Agency certified that Mitigated Negative Declaration No. ENV-2013-2994-MND reflects the independent judgement of the lead agency and determined that this project would not have a significant effect upon the environment provided that the potential impacts identified above are mitigated to a less than significant level through implementation of **Conditions Nos. 17 and 18** of the Tract's approval.

The Initial Study, prepared for the project by Parker Environmental Consultants (published on July 18, 2016), identifies potential adverse impact on fish or wildlife resources as far as earth, air, and plant life are concerned. However, measures are required as part of this approval, which will mitigate the above mentioned impacts to a less than significant level. Furthermore, the project site, as well as the surrounding area is presently developed with structures and does not provide a natural habitat for either fish or wildlife.

Any demolition, grading, and construction will be conducted per the requirements of the Los Angeles Municipal Code and associated permits needed to perform such work. These permits also restrict work hours to mitigate noise pollution.

(f) THE DESIGN OF THE SUBDIVISION OR TYPE OF IMPROVEMENTS IS NOT LIKELY TO CAUSE SERIOUS PUBLIC HEALTH PROBLEMS.

There appears to be no potential public health problems caused by the design or improvement of the proposed subdivision. The development is required to be connected to the City's sanitary sewer system, where the sewage will be directed to the LA Hyperion Treatment Plant, which has been upgraded to meet Statewide ocean discharge standards. The Bureau of Engineering has reported that the proposed subdivision does not violate the existing California Water Code because the subdivision will be connected to the public sewer system and will have only a minor incremental impact on the quality of the effluent from the Hyperion Treatment Plant.

(g) THE DESIGN OF THE SUBDIVISION OR THE TYPE OF IMPROVEMENTS WILL NOT CONFLICT WITH EASEMENTS, ACQUIRED BY THE PUBLIC AT LARGE, FOR ACCESS THROUGH OR USE OF PROPERTY WITHIN THE PROPOSED SUBDIVISION.

There are no recorded instruments identifying easements encumbering the project site for the purpose of providing public access. The project site contains legally

the City Planning Department and appeal fees paid, prior to expiration of the above 10-day time limit. Such appeal must be submitted on Master Appeal Form No. CP-7769 at the Department's Public Offices, located at:

Figueroa Plaza
201 North Figueroa Street
4th Floor
Los Angeles, CA 90012
(213) 482-7077

Marvin Braude San Fernando
Valley Constituent Service Center
6262 Van Nuys Boulevard, Room 251
Van Nuys, CA 91401
(818) 374-5050

Forms are also available on-line at http://cityplanning.lacity.org

The time in which a party may seek judicial review of this determination is governed by California Code of Civil Procedure Section 1094.6. Under that provision, a petitioner may seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, only if the petition for writ of mandate pursuant to that section is filed no later than the 90th day following the date on which the City's decision becomes final.

(11-16-16)
Commercial Condos

LOS ANGELES' INDUSTRIAL LAND:

SUSTAINING A DYNAMIC CITY ECONOMY

PREPARED BY THE DEPARTMENT OF CITY PLANNING AND THE COMMUNITY REDEVELOPMENT AGENCY
OF THE CITY OF LOS ANGELES

DECEMBER 2007

CRA/LA
BUILDING COMMUNITIES

Contents

INTRODUCTION AND BACKGROUND 3
I. INDUSTRIAL LAND AND ZONING IN LOS ANGELES 7
Industrial Zones and the Industrial Sector 7
Industrial Land Supply in Los Angeles 10
Evolving Industrial Districts 11
Strategic Importance of Downtown Los Angeles 12
Land for Emerging Industry Sectors 13
II. THE IMPORTANCE OF INDUSTRIAL LAND TO THE LOS ANGELES ECONOMY 15
Los Angeles' Industrial Workforce 15
"Ripple Effects" to the Los Angeles Economy 18
III. REAL ESTATE ECONOMICS SHAPING INDUSTRIAL LAND USES IN LOS ANGELES 20
Current Industrial Demand and Vacancy Rates 20
Demand for Housing in Industrial Districts 22
Opportunities for Housing Development Throughout Los Angeles 23
Economic Impact of Conversion to Housing on the City's General Fund 24
Impacts of Industrial-to-Residential Conversion on the City's Long Term Development 25
CONCLUSION 28
Appendix 1 29
METHODOLOGY / ANALYSIS FRAMEWORK 29
Appendix 2 33
General Plan Excerpts 33
Appendix 3 40
Other Existing Policies that Shape Industrial Districts 40
Appendix 4a 42
Other Cities' Industrial Land Use Policies 42
BIBLIOGRAPHY 52
ACKNOWLEDGEMENTS 54

Introduction and Background

Job producing land is a critical component of a healthy and prosperous city. Industrial zoned areas of Los Angeles offer employment opportunities for residents of all skill and education levels, create and support jobs in multiple other business sectors, and generate taxes that sustain the quality of life elsewhere in the City by funding streets and sidewalks, police and fire services, libraries, trash collection, and more. For these reasons, the City of Los Angeles has had a long-standing adopted policy to preserve industrial lands. The General Plan Framework states that the City of Los Angeles must **"actively ensure that the City has sufficient quantities of land suitable to accommodate existing, new and relocating industrial firms."** It also limits the conversion of existing industrial land to other land uses to avoid creating **"a fragmented pattern of development [that] reduces the integrity and viability of existing industrial areas."** [1]

City of Los Angeles General Plan Framework Land Use Goal:

"Industrial growth that provides job opportunities for the City's residents and maintains the City's fiscal viability."

This existing policy states the City's intent to:

- Protect industrial zoned land;
- Retain and expand existing businesses;
- Attract new uses that provide job opportunities for the City's residents; and
- Maintain a healthy jobs/household ratio that supports the General Fund and its capacity to pay for essential services and programs for the City's existing and future population.

Despite this long-standing policy to support industrial and employment generating land uses, the policy has been increasingly overlooked, recently prompting a renewed effort to retain critical job-producing lands, the jobs they support, and the revenues they generate for the City. The industrial sector in Los Angeles employs fully one–quarter of the City's total workforce[2] and creates an estimated $219,000,000 annually in City tax revenue. More than 410,000 persons are employed in the industrial sector.[3]

The diverse and dynamic economy of Los Angeles is increasingly home to many types of 'new economy' jobs that are considered industrial. Technological advances and global economic changes are replacing 'smokestack' industries with more light manufacturing, apparel, biomedical, logistics

[1] General Plan Framework, Section 7.2.11 (1996, 2001).
[2] California Employment Development Dept., Labor Market Information Division, ES202 data (2005).
[3] This number represents persons working in the City of Los Angeles, irrespective of place of residence.

and creative industries. Moreover, Los Angeles provides opportunities for start up businesses; industrial zones offer the conditions needed for entrepreneurs and small businesses to grow and expand, as well as transition to full production.

In addition to directly supporting job-producing uses, industrial zoned land is crucial to many services essential to Los Angeles' business and residential communities including utilities, distribution, recycling, construction and maintenance yards, animal services, and automobile repair. These businesses are also critically linked to other business sectors that rely on goods and services produced in industrial zones.

Competition for industrially zoned land in Los Angeles is extremely high; industrial land in the City has the lowest vacancy rate in the nation, remaining consistently below two percent. Yet the supply of these critical job-producing areas is becoming increasingly scarce as non-industrial uses such as residential, big-box retail, schools, open space and recreational facilities continue to encroach on industrial land. Currently, **26 percent of Los Angeles' industrial land is already used for non-industrial purposes**[4], leaving just six (6) percent of the City's total land area available for active industrial uses. In Downtown Los Angeles, West Los Angeles and increasingly in Hollywood, residential developers have purchased industrial properties to convert them to high-end housing, creating speculative markets that result in increasing land prices and uncertainty about future land use decisions, making it difficult for our most important industries to do business in Los Angeles and for new industries to have the confidence to invest. As a recent market report forecasting the fate of industrial land in Los Angeles cautions:

> *"The major concern is what the developers will do with the minimal vacant land that is left in Los Angeles County. Developers of all types of product: residential, retail, office and industrial, will all scramble to gobble up land and turn it into what they believe will be the most profitable use. The recent trend in Los Angeles has been mixed-use and high-end condominium construction. If this trend continues, industrial space will be in even tighter demand, pushing more users in the area to move east [to the Inland Empire]."*[5]

When industrial businesses and jobs leave the City, it not only redirects economic value and revenues to other cities, it potentially leaves Los Angeles residents with fewer—and often lower-paying—employment opportunities. To protect job-producing land in the City of Los Angeles, the Mayor's Office of Economic Development appointed an Industrial Development Advisory Committee in 2003 to make policy recommendations to the Mayor and City Council to help the City:

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[4] Not including the Airport and Port of Los Angeles. DCP GIS (2004).
[5] Grubb & Ellis, *Industrial Market Trends: Los Angeles County* (Second Quarter 2007).

- Encourage industrial economic activity in the City of Los Angeles;
- Retain and optimize the use of the City's industrial zoned land;
- Increase the number of quality jobs available to local residents; and
- Increase the City's revenues from industrial activity.

The Committee issued the *Industrial Development Policy Initiative* Phase 1 in early 2004 and Phase 2 in late 2005. These reports characterized Los Angeles' industrial base, examined the factors that influence the vitality of the industrial sector, and made preliminary policy recommendations to expand the City's industrial base. Both the 2004 and 2005 reports underscore the significance of the City's industrial land use policies to the City's economic prosperity.

As the public bodies responsible for implementing City land use policy, the Los Angeles Department of City Planning (DCP) and the Community Redevelopment Agency of the City of Los Angeles (CRA/LA) have an obligation to ensure an adequate supply of land for existing businesses to operate and to employ the City's residents, as well as to enhance the City's ability to foster business and job growth.

By 2005, Los Angeles was experiencing intense pressure to convert relatively inexpensive industrial land to other uses including residential development and public and private schools. As a result, the Mayor directed DCP and CRA/LA to look more deeply into the ramifications of the potential loss of the City's industrial areas. The Industrial Land Use Policy (ILUP) Project was thus undertaken to:

- Address the increasing numbers of zone change, general plan amendment and redevelopment plan variation applications to convert industrial land to other uses; and
- Evaluate the efficacy of the City's existing industrial land use policy in order to provide guidance to DCP and CRA/LA staff as they begin updating the Community Plans and related documents that include many of the City's industrial/employment districts.

The ILUP Project staff released preliminary findings and conclusions in November 2006, which were presented to community members, residents, business owners, developers, advocacy groups, and City staff, for review and comment over a period of six months. ILUP Project staff subsequently conducted additional analysis to address issues raised by the various groups and revised the preliminary determinations.

This report is the culmination of ILUP Project research, analysis and public outreach. It is submitted in conjunction with industrial land use policy implementation directions to DCP and CRA/LA staff.

The directions include both typological and geographically-specific staff guidance that together with this report provide policymakers and the public with a comprehensive understanding of the role of industrial and employment lands in the City of Los Angeles and why they are important to the social and economic health of the City. While its scope is Citywide, this report emphasizes conditions in Greater Downtown Los Angeles where the most acute land use conflicts are occurring, and thus where the most attention has been focused.

This report is organized into five sections:

I. *Industrial Land and Zoning in Los Angeles* reviews types of industrial uses in Los Angeles and policy/planning efforts that shape these uses;

II. *The Importance of Industrial Land to the Los Angeles Economy* reviews wage levels, demographics and workforce development issues related to industrial uses;

III. *Real Estate Economics Shaping Industrial Land Uses in Los Angeles* reviews current industrial demand and vacancy rates, impacts of demand for housing in industrial districts, and discusses the opportunities for housing development throughout Los Angeles;

IV. *Conclusion* summarizes and concludes report findings; and

V. *Appendices* include a summary of the methodology and analysis used in the review of the City's existing industrial lands, excerpts from the General Plan Framework Element, brief descriptions of existing City policies that affect industrial land, and an overview of other cities' strategies for preserving and enhancing industrial districts.

I. Industrial Land and Zoning in Los Angeles

Zoning is important for the separation of land uses as well as to ensure that an adequate supply of land is available for current and future development. Zoning is based on comprehensive planning for the entire City to ensure that there is a balance of space to house and employ City residents and to support the services that meet both residential and non-residential needs. The distribution and organization of zones reflect the designation of land use categories in the General Plan Land Use Element and Community Plans. This allocation is intended to ensure that development is consistent with adopted plans and that development does not adversely affect the City's fiscal health or environmental resources. While it is possible to apply to the City Council for a change of zone for any particular parcel in the City, the intent of the Community Plans is to create rational land use and zoning designations and to discourage incompatible or inappropriate development, i.e., "spot zoning."

In Los Angeles there are four primary zoning categories—residential, commercial, industrial, and public facilities—with each category divided into more specific zones to allow for variation in intensity and mix of uses. The separation of uses is intended to protect sensitive uses such as homes and schools from noise and traffic, and allows commercial and industrial districts to exist without restrictions that could hinder business operations.

ZONING 101

All private and public land in a city is designated for a particular type of use; this separation of uses is commonly referred to as zoning. Zoning is the tool used to implement broad policies related to land development in the city. Zoning allows certain uses to be located on particular parcels while restricting other uses. For instance, single family residential zones typically do not allow commercial uses such as shopping malls and offices, or industrial uses such as recycling yards or auto repair shops.

Industrial zones prohibit uses such as housing and hospitals because of the potential for environmental and health conflicts. It would be inappropriate, for instance, to have a residence, school or hospital next to a noisy or noxious manufacturing plant.

Industrial Zones and the Industrial Sector

The Industrial sector represents a portion of the economy that includes manufacturing, warehousing, transportation, wholesale trade, publishing, logistics and motion picture production. Most of the activities that support these industries occur within industrial zones. For simplicity it is useful to classify businesses or uses into three main categories:

- ***Heavy Industry*** describes the most intensive industrial uses, such as large-scale manufacturing operations, aerospace, transportation and logistics, refineries, scrap metal facilities, produce storage and distribution, and similar uses whose impact on adjacent land may be significant and noxious or noisy.[6]

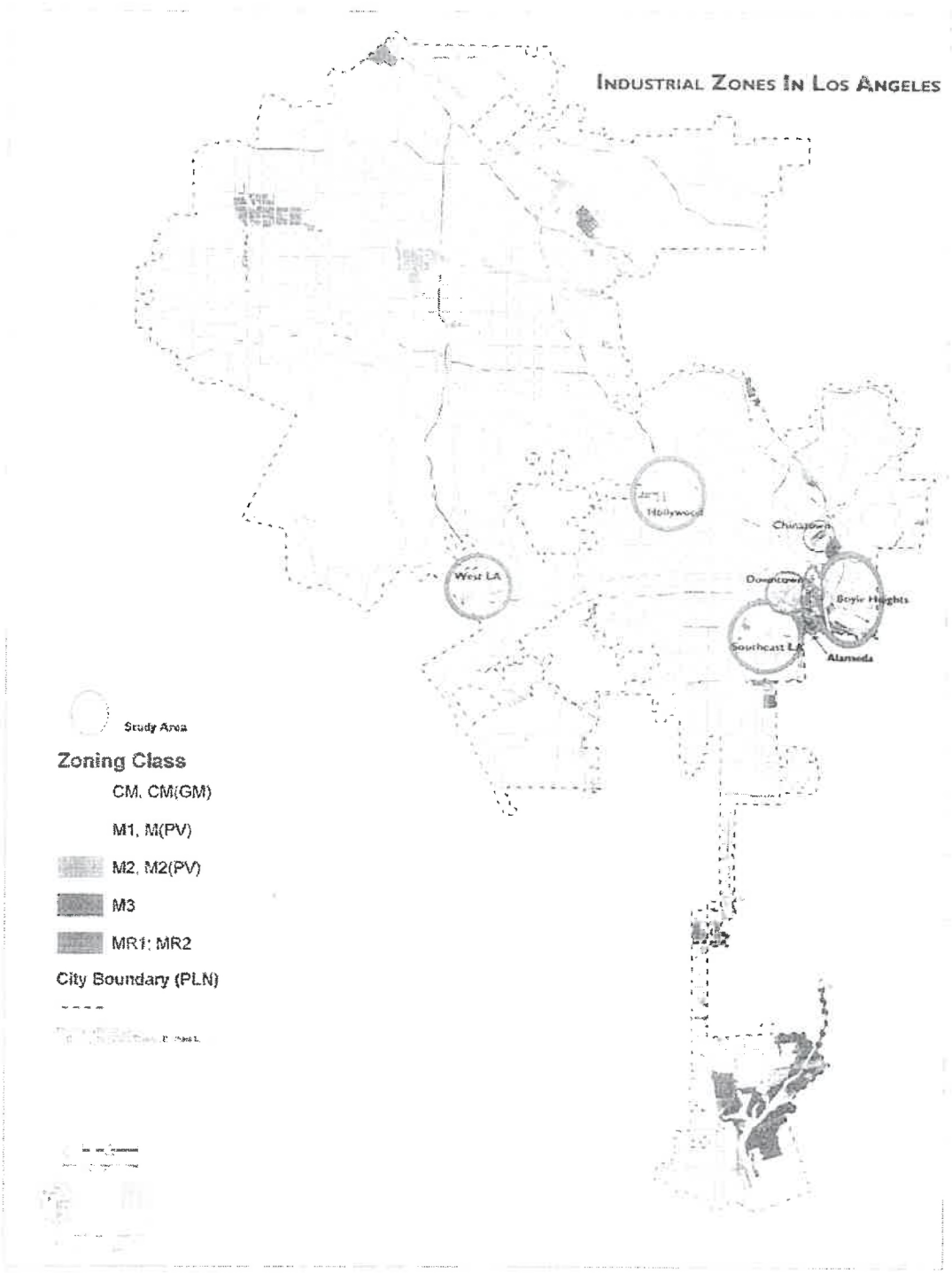
- Lower-impact uses fit into the category of ***Light Industry***. These include clothing design and manufacturing, furniture design and manufacturing, packaging and assembly, warehouse/distribution, biomedical research/manufacturing, and wholesale sales. Light industry also includes a variety of "neighborhood industrial services" that benefit from the close geographic relationship to customers, wholesalers and related services. Such uses include animal hospitals and kennels, automobile service and painting, lumber yards and specialty construction materials.

- ***Studio & Production*** uses are especially important to the Los Angeles economy. These types of uses often require specialized buildings that provide high ceilings, wide clearances and extensive power infrastructure but do not produce many of the nuisances of some other industrial uses. Common activities in this category range from film and television production campuses with sound studios, lumber yards and prop houses, to digital sound studios and graphic production offices. These types of uses—while not noxious—may still produce limited impacts due to extended hours of operation and/or deliveries. They frequently locate in districts in close proximity to related industrial and commercial businesses in order to maximize the synergy and interdependence these uses have with each other and with suppliers, clients, and related independent contractors.

These categories correspond roughly to industrial zoning, which is separated into zones from heaviest (M3, M2) to lightest (M1, MR and CM) intensity. Heavy industry and uses that produce noise, odors or other environmental impacts are typically separated from other uses that produce fewer impacts, including light industrial uses. Figure 1 illustrates the distribution of industrial zones in Los Angeles.

[6] Port and airport activities are considered heavy industry, but this report excludes these from the discussion due to their specialized needs and operating requirements.

FIGURE 1: INDUSTRIAL ZONED LAND IN LOS ANGELES



Industrial Land in Los Angeles

Just eight percent of the City of Los Angeles (excluding the Port of Los Angeles and LAX) is zoned for industrial use—about 19,000 acres. These 19,000 acres are the only parts of the City where industrial and other high-impact uses may locate. Of this total area, 26 percent is already used for non-industrial purposes including residential, retail and institutional uses (see Table 1).

TABLE 1: TYPES OF USES IN LOS ANGELES' INDUSTRIAL ZONES

Type	*Total Acres*	*% of Total*
Light Manufacturing	5,349	28.1
Other Industrial Uses*	3,991	21.2
Warehousing	2,222	11.7
Institutional	*1,906*	*10*
Retail	*1,550*	*8.1*
Heavy Manufacturing	1,380	7.3
Residential	*778*	*4.1*
Commercial	*615*	*3.2*
Misc. and Unknown	525	2.8
Food Process Plants	279	1.5
Open Storage	267	1.3
Film & TV Production	110	0.5
Recreational	*74*	*0.4*
Industrial Uses	**14,123**	**74%**
Non-industrial Uses	*4,923*	*26%*
TOTAL	**19,046**	**100%**

**includes Mineral Processing, Oil and Gas, Lumber, Airport and Port of LA uses (not the actual Port and LAX), City Landfills, and Parking Lots.*

Source: IDP Phase 1 Report 2004, page 74

Although certain uses are prohibited in industrial areas, the City of Los Angeles' zoning code is permissive, meaning that the code allows certain non-industrial uses—retail stores, offices, animal clinics/kennels, gas stations, and auto sales, most of which are allowed in commercial zones—in industrial zones. So even without industrial conversions or zone change applications, industrial districts are subject to being compromised by the presence of such uses.

In addition to the competition that industrial zoned land experiences due to the variety of uses allowed, discretionary actions by decision-makers have also contributed to the diminishing supply of land for industrial and employment uses. The General Plan Framework makes it clear that conversions to non-industrial uses should only be allowed "where it can be demonstrated that the reduction of industrial lands will not adversely impact the City's ability to accommodate sufficient industrial uses to provide jobs for the City's residents or incur adverse fiscal impacts."[7] Approving conversions of industrial parcels on a project-by-project basis without regard to the broader citywide context, coupled with Los Angeles' permissive zoning code, has diminished the availability of the City's industrial lands along with the jobs, industries, and General Fund revenues they support.

Evolving Industrial Districts

The term "industrial" no longer only refers to large factories producing steel, cars or other mass produced goods. Today the term describes a broader array of job-producing uses and activities—in addition to traditional industrial uses—such as furniture and clothing design, biomedical research/manufacturing, and entertainment-related post-production activities that do not necessarily generate impacts such as noise, traffic and pollution.

While the industrial/employment sector is evolving, Los Angeles County remains the largest manufacturing region in the United States. Although globalization has generally triggered an exodus of jobs from many American city centers, the strategic importance of Los Angeles and its industrial lands has been strengthened. As a recent industrial market report for Los Angeles states:

> *With the regional Los Angeles economy thriving, industrial space will remain at a premium. Although other parts of the nation have suffered because of the outsourcing of manufacturing, Los Angeles has been able to cope with the problem. Due to the greater volume of imports here, the demand and need for logistics and warehouse/distribution space is very high.*[8]

Industrial districts are a critical component of the dynamic entrepreneurial economy of Los Angeles. In many instances, these thriving districts developed where a core industry was first established, later followed by support services and related businesses.

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[7] General Plan Framework, Chapter 3 Section 14.6.
[8] Grubb & Ellis, *Industrial Market Trends: Los Angeles County* (Second Quarter 2007).

> *"Everything is made within a two-mile radius of this building. This is our way of remaining competitive."*
>
> ERIC KIM AND HENRY KIM, CO-OWNERS OF MONARCHY CLOTHING COMPANY IN DOWNTOWN LOS ANGELES

This can be seen in several industrial districts in Los Angeles that have located proximate to regional transportation infrastructure and have evolved into specialized districts such as fashion design/production, goods distribution (including food), entertainment and aerospace. These industrial districts are home to many small and start-up operations, which are a critical component of the dynamic regional economy. The entertainment industry and its support activities such as prop houses, lumber yards, digital film editing and sound stages are clustered primarily in industrial districts of Hollywood, Studio City and other parts of the San Fernando Valley. Warehousing and logistics industries are clustered into districts around the port and airports (both LAX and Van Nuys), along the freeway and rail lines bisecting the San Fernando Valley, and around the freight transportation hubs east and southeast of Downtown Los Angeles. Smaller industrial clusters remain along former railroad lines in portions of South and Southwest Los Angeles.

Strategic Importance of Downtown Los Angeles

Los Angeles's expansive rail and freeway networks connect the Ports of Long Beach and Los Angeles to the greater Southern California region and to the rest of the United States. At the confluence of these networks, the industrial lands of Downtown Los Angeles are attractive for industries such as logistics, goods movement, wholesale and import trade, food distribution and fashion. The Downtown Fashion District is the apparel hub of the West Coast, and caters to high-end and rapid-turnaround clients that rely on the quality labor pool and proximity of Los Angeles' fashion industry. As the *LA Times* recently wrote, "At a time when more and more clothing companies are seeking cheaper manufacturing abroad, dozens of fledgling labels like Monarchy [Clothing Company] aren't. This new collection of manufacturers is capitalizing on Los Angeles' growing status as a fashion hub and helping stem some of the job losses to China, Indonesia, Vietnam and other countries—and redefining an industry that has long been a staple of the local economy."[9]

[9] Yi, Daniel. "Clothing maker keeps it all local." *Los Angeles Times*, September 6, 2007.

Land for Emerging Industry Sectors

Tomorrow's industrially-zoned land, reserved for business growth and employment, is likely to look different than today's. It is important to preserve and strengthen the City's ability to maintain and expand a diverse and flexible economic and industrial base. Key to such flexibility is securing industrial land upon which cutting-edge sectors can grow, and providing new foundations for our local economy, while retaining existing businesses that currently employ hundreds of thousands of Los Angeles residents. While economists predict that sectors such as trade and logistics will continue to be robust, there are emerging industries in Los Angeles such as green technology that are particularly promising and important to the City's future competitiveness.

Los Angeles has significant strengths and is well positioned to be a global leader in fields as diverse as clean technology, biomedical device manufacturing, digital arts, furniture and apparel design and other high growth industries. Clean technology is a good example. As the green economy booms, Los Angeles is poised to become a capital in the fast-growing clean technology sector. Clean or green technology (alternative energy, energy efficiency, clean transportation, green building recycling, etc.) produces goods and services in a more resource-efficient and sustainable way. This nascent industry has raised more than $2.7 billion in venture capital investment during the first nine months of 2007, up 46% from the entire year of 2006.[10] This makes green technology the third-largest source of venture capital, behind software and biotechnology.

Eco-industrial parks and bio-medical research parks are being developed in other cities with bold strategic visions for their futures (including Boston, Chicago, Philadelphia, and San Francisco). Such developments can cluster businesses with certain core capabilities (e.g., makers of photo-voltaic and solar energy products, electric vehicles, circuit boards, steel fabricators, design firms, renewable construction, etc.) that reduce dependence on transportation and increase competitiveness.

In green technology, Los Angeles has significant advantages over other regions: the City has committed to numerous actions that can help build the green economy (e.g., Clean Air Action Plan, implementing Assembly Bill 32, 20% Renewable Portfolio Standard, Green Building Plan). With three leading research universities in the Los Angeles region—University of California Los Angeles, University of Southern California, and California Institute of Technology—and with a large, trend-setting

[10] Thomson Financial and the National Venture Capital Association. "Cleantech Venture Investments By Us Firms Break Record In 2007" (http://www.nvca.org/) November 28, 2007.

consumer market, the City has both the human capital and the marketplace for green technology businesses to thrive.

Additionally, industrial lands in Los Angeles play an important role as incubator space for small start up and creative businesses. This entrepreneurial pattern fits perfectly into Los Angeles' tradition of supporting a broad base of independently owned and operated businesses; most businesses in Los Angeles are small, independently owned and operated.[11] These firms represent entrepreneurial and innovative businesses that can only become established under conditions available in industrial zones—relatively low rents, small spaces/lots and/or business incubator space. Many of these businesses are cleaner than those of the past and they provide good career-ladder jobs for local neighborhoods that have seen a decline in other local manufacturing jobs.

In order to recruit and attract these and other new businesses, the City must provide land where they can locate. Moreover, as businesses grow and expand, they often need sites to transition into larger-scale manufacturing and assembly firms. A common complaint from entrepreneurs and investors is that Los Angeles lacks available land to incubate start-up companies or to attract and retain more established companies. This factors into the decisions of some entrepreneurial businesses to leave Los Angeles once their products become commercialized. Preserving industrial land in Los Angeles is critical to encourage innovation in these emerging industries, to attract growing companies from other areas, and to grow job-producing companies already in Los Angeles.

[11] 94.5% of LA County businesses have fewer than 50 employees. *LAEDC, Downtown Los Angeles 2004 Economic Overview & Forecast* (prepared for Central City Association (February 2004).

FILED
Superior Court of California
County of Los Angeles

JUL 29 2016

Sherri R. Carter, Executive Officer/Clerk
By Michael Rivera, Deputy
Michael Rivera

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DONALD KOTTLER; and
MARLENE KOTTLER,

Petitioners/Plaintiffs,

vs.

CITY OF LOS ANGELES;
CENTRAL AREA PLANNING
COMMISSION OF THE CITY OF
LOS ANGELES;
ASSOCIATE ZONING ADMINISTRATOR
ALBERT LANDINI; and
DOES 1 through 10, Inclusive,

Respondents/Defendants.

MICHAEL SOURAPAS; and
DOES 11 through 20, Inclusive,

Real Parties in Interest/Defendants.

Case No. BS 154184

DECISION ON PETITION FOR WRIT OF MANDATE: GRANTED IN PART

Hearing: July 27, 2016
Time: 9:30 a.m.
Dept.: 86
Judge: Honorable Robert H. O'Brien

Petitioners Donald and Marlene Kottler ("Petitioners") seek a writ of mandate ordering Respondents the City of Los Angeles; the Central Area Planning Commission of the City of Los Angeles ("APC"); and Associate Zoning Administrator Albert Landini ("Landini) to set aside their decision approving Real Party in Interest Michael Sourapas's ("Real Party")

application for a variance for the home on his property, which is adjacent to Petitioners' home. Real Party's application was approved by the Associate Zoning Administrator Albert Landini on July 18, 2014 and Petitioners' appeal of the decision was denied by the Central Area Planning Commission of the City of Los Angeles on December 17, 2014. This petition followed.

Petitioners' first request for judicial notice is granted.

On reply, Petitioners submitted an additional request for judicial notice. Real Party and Respondents objected to this second request for judicial notice on July 14, 2016. Petitioners' second request for judicial notice is denied. Petitioners failed to introduce these authorities in their opening brief, thus depriving Real Party and Respondents of an opportunity to meaningfully respond. Further, Petitioners did not make a proper showing of good cause for this failure. *Balboa Ins. Co. v. Aguirre* (1983) 149 Cal.App.3d 1002, 1010.

Real Party and Respondents' request for judicial notice is granted pursuant to Evidence Code section 451 and 452.

Real Party owns the real property located at 112 N. June Street in the City of Los Angeles (the "Property").

Due to the location and size of the Property it is subject to several zoning restrictions, including the Wilshire Community Plan, Baseline Mansionization Ordinance ("BMO") and the Hancock Park Historic Preservation Overlay Zone. (7 AR 484-485). Under the BMO, the maximum residential floor area permitted on the Property was 35% of the lot area, or 7,688 sq. ft., plus an additional 20% "bonus" allowable under Los Angeles Municipal Code ("LAMC") section 12.07.01.C.5(a), for a total "by right" maximum floor space of 9,225 sq. ft. (Petitioners' RJN, Ex. 3; 7 AR 486). If a homeowner wishes to construct floor space in

excess of the maximum allowed by right, then they must apply for a discretionary land use entitlement.

On February 4, 2014, Real party applied for a Zoning Administrator's Adjustment to permit additions to the first floor, second floor and patio/porch areas of his home. The proposed additions increased the residential floor space to 10,138 sq. ft., or 913 sq. ft. more than was allowed by right. (1 AR 63-64).

A public hearing on the application was heard on April 24, 2014 by Zoning Administrator ("ZA") Albert Landini. Landini was a retired ZA working on a temporary contract by appointment of the Mayor pursuant to Los Angeles City Charter section 1164. Petitioners appeared at the hearing and opposed the application. (2 AR 298-386). On July 18, 2014, Landini issued a letter of determination approving the adjustment. (7 AR 481-547). Petitioners appealed the determination to the Central Area Planning Commission of the City of Los Angeles ("APC"). (8 AR 548-549).

On November 25, 2014, the APC heard the appeal and denied it with a 3-0 vote. The APC mailed its determination to Petitioners on December 17, 2014. (9 AR 856-857).

On February 23, 2015, Petitioners filed a petition for a writ of mandate seeking to set aside the APC'S denial of his appeal and a declaratory relief.

Petitioners seeks a writ of mandate pursuant to California Code of Civil Procedure section 1094.5.

Where, as here, the agency's decision neither involves nor substantially affects a fundamental vested right, the trial court's review is limited to determining whether the agency's decision and findings are supported by substantial evidence. *Bixby v. Pierno*, (1971) 4 Cal.3d 130, 143; *Strumsky v. San Diego County Employees Retirement Assn.*, (1974) 11 Cal.3d 28, 32.

Petitioner seeking a writ of administrative mandamus has the burden of proof. Steele v. Los Angeles County Civil Service Commission, (1958) 166 Cal.App.2d 129, 137; Afford v. Pierno, (1972) 27 Cal.App.3d 682, 691 ("[T]he burden of proof falls upon the party attacking the administrative decision to demonstrate wherein the proceedings were unfair, in excess of jurisdiction or showed prejudicial abuse of discretion."). The agency's decision at the hearing must be based on the evidence. Board of Medical Quality Assurance v. Superior Court, (1977) 73 Cal.App.3d 860, 862. The agency's decision will only be overturned if, "based on the evidence before the agency, a reasonable person could not reach the conclusion reached by the agency." Sierra Club v. California Coastal Comm'n, (1993) 12 Cal. App.4th 602, 610.

To the extent the case involves the interpretation of a statute, which is a question of law, the Court reviews the hearing officer's decision de novo. See Silver v. Los Angeles County Metropolitan Transportation Authority, (2000) 79 Cal.App.4th 338, 348; Anserv Insurance Services, Inc. v. Kelso (2000) 83 Cal.App.4th 197, 205.

Petitioners argue that Respondents' decision must be set aside because: (1) the adjustment violates the City Charter's mandatory conditions for approving a variance; (2) the City improperly delegated its non-discretionary, quasi-judicial police powers to retired ZA Albert Landini; and (3) the findings underlying the adjustment are not supported by substantial evidence.

The "Adjustment"

Zoning Administrator Landini relied on LAMC section 12.28 when approving Real Party's request for an adjustment. LAMC section 12.28 permits the ZA to grant an adjustment of 10% or less of the maximum residential floor area that would otherwise be allowed on the property, subject to certain mandatory findings. Petitioners argue that LAMC

section 12.28 is invalid because it allows the ZA to approve a variance without making the findings required by City Charter section 562, which lists five specific findings that must be made before any variance is granted.

Los Angeles City Charter section 562, entitled "Variances", requires the City Council to prescribe by ordinance the procedures for the granting of variances and proceeds to list various procedural requirements. See Petitioners' RJN, Ex. 1, p. 5. Among those requirements are certain mandatory findings that the ZA "shall" make before granting a variance.

Los Angeles City Charter, § 562(c); Petitioners' RJN, Ex. 1, p. 5. LAMC section 12.27, adopted by ordinance, provides the procedural steps and outlines the mandatory findings and other requirements for approval of a variance. Id., Ex. 3, pp. 11-19.

In this case, it is undisputed that the ZA did not make the five mandatory findings required for a variance under Los Angeles City Charter section 562. Instead, the ZA relied on LAMC section 12.28, which permits the ZA to approve an "adjustment" from the maximum residential floor area of 10% or less beyond what would otherwise be permitted under the Code. RJN, Ex. 3, pp. 20-23.

Petitioners argue that LAMC section 12.28 exceeds the City Council's authority because it does not require compliance with Los Angeles City Charter section 563, and that the ZA's approval under that section is therefore invalid. Real Party and Respondents counter that the "adjustment" provided for in section 12.28 is not a variance subject to Charter section 563. Instead, it is an entirely different process for obtaining an adjustment to the zoning regulations that the City was authorized to adopt by ordinance pursuant to City Charter sections 558 and 563, which allow for a variety of land use ordinances. The Court agrees with Petitioners' contentions.

The charter of a charter city delineates the extent of its authority. "Any act that is violative of or not in compliance with the charter is void." City of San Diego v. Shapiro (2014) 228 Cal.App.4th 756, 789. Moreover, section 562 "acts as a limitation upon the power of the administrative Board to grant variances." Moss v. Board of Zoning Adjustment of the City of Los Angeles (1968) 262 Cal.App.2d 1, 8.

In this case, the APC approved the ZA's decision to grant an "adjustment" of the application of the zoning laws to the Property pursuant to LAMC section 12.28, which allows the ZA to approve the construction of residential floor space of a maximum of 10% above what would otherwise be permitted without making the findings required for a variance under Charter section 562. This the City could not do. The "adjustment" provided for in LAMC section 12.28 is "a permit to build a structure or engage in an activity that would not otherwise be allowed under the zoning ordinance...". Neighbors in Support of Appropriate Land Use v. County of Tuolumne (2007) 157 Cal. App.4th 997, 1007; see also Hamilton v. Board of Supervisors of Santa Barbara County (1969) 269 Cal.App.2d 64, 66. In other words, it is a variance. Under the plain terms of the City's own charter any such variance could *only* be made after the ZA made five findings relating to the need for a special exception to the zoning requirements. See Los Angeles City Charter § 562(c); Petitioners' RJN, Ex. 1, p. 5. Accordingly, Respondents erred when they approved a variance without making the required findings under City Charter section 562(c).

Real Party and Respondents first argue that City Charter sections 563 and 558(a)(2) authorize the City Council to adopt alternative land use ordinances, including the "adjustment" provided for in LAMC section 12.28. The Court disagrees. City Charter section 563 authorizes the City Council to prescribe by ordinance "the procedure for the granting of conditional use permits and similar quasi-judicial approvals...". Los Angeles City

Charter § 563(b); Real Party and Respondents' RJN, Ex. 6. This section is inapplicable because Real Party was not seeking a conditional use permit or similar approval. Rather, he was seeking an exception from generally applicable zoning laws relating to the permissible square footage of a structure—i.e., a variance. Conditional use permits, on the other hand, relate to the permitted use of a property, not the size or design features of the buildings on that property. See *Essick v. City of Los Angeles* (1950) 34 Cal.2d 614, 623 ("[A] conditional use is a separate and distinct concept from a variance and...is granted for a public or quasi-public purpose within the terms of the...ordinance itself rather than to obviate the 'practical difficulties, unnecessary hardships or results inconsistent with the general purposes of the zoning regulations' as applied to individual property owners, which must be shown before a variance may be granted...."). City Charter section 558 simply provides the procedures for adopting, amending or repealing certain ordinances, orders and resolutions. Section 558(a) lists the types of ordinances to which the section applies. Nothing in section 558 purports to authorize the City Council to enact, by ordinance, a variance procedure that ignores section 562 of the charter.

Second, Respondents' argue that interpreting City Charter section 562 to apply to all requests for a variance from the zoning laws would render City Charter sections 563 and 558 and LAMC sections 12.24 and 12.28 superfluous. This position is unavailing for the reasons just discussed. Applying City Charter section 562 here does not render section 563 and 558(a)(2) superfluous because the latter two sections apply in distinct situations where the applicant is seeking a conditional use permit and where the City Council is adopting, amending or repealing zoning or other land use ordinances. Similarly, LAMC 12.24 relates to conditional use permits and other quasi-judicial approvals and is not relevant here. As for LAMC section 12.28, finding City Charter section 562 applicable here does not render that

provision *superfluous*; rather, it renders an approval based on that section void as in violation of the express requirements of the controlling City Charter.

Based on the foregoing, the Court concludes that Respondents' determination approving the "adjustment" for the Property was not supported by the mandatory findings under City Charter section 562(c). Accordingly, the APC erred when it upheld the ZA's decision granting the adjustment and a writ will issue directing the APC to set aside its decision and issue a new order sustaining Petitioners' appeal. See *Cow Hollow Imp. Club v. DiBene* (1966) 245 Cal.App.2d 160, 167-68.

In addition to seeking a writ of administrative mandate overturning the APC'S decision, Petitioners also pray for a declaration that LAMC section 12.28 violates the City Charter and is therefore void. Real Party and Respondents oppose declaratory relief on the grounds that any facial challenge to LAMC section 12.28 is time barred by California Government Code section 65009(c)(1)(B) which establishes a 90-day time limit to attack the decision of a legislative body to adopt a zoning ordinance. The Court finds that declaratory relief is inappropriate at this time.

Declaratory relief is inappropriate here for two reasons. First, the language of LAMC section 12.28 does not necessarily create a conflict with the City Charter. Section 12.28 requires the ZA to make three findings before granting an application for an adjustment; it does not specify that these three findings are the *only* findings that need be made before granting the adjustment. See LAMC section 12.28.C.4; Petitioners RJN, Ex. 3, p. 22. While this is certainly how the City interpreted the adjustment section here, there is no indication that it does this as a matter of course or in all cases.

Second, in light of the decision on Petitioners' writ of administrative mandate, there is no "actual controversy" between the parties. An "actual controversy" language

"encompasses a probably future controversy relating to the legal rights and duties of the parties." *Environmental Defense Project of Sierra County v. County of Sierra* (2008) 158 Cal.App.4th 877, 885. To support an action for declaratory relief, this action must be "ripe"; that is, it must "have sufficiently congealed to permit an intelligent and useful decision to be made." Ibid., citing *California Water & Telephone Co. v. County of Los Angeles* (1967) 253 Cal.App.2d 16, 22. Here, the parties had an actual controversy relating to the application of section 12.28 to Real Party's application for an "adjustment." The decision on the writ of mandate wholly disposes of this dispute. Petitioner's interest in resolving this dispute is also wholly disposed of—with this decision, they have achieved their ends. Accordingly, Petitioners' challenge to the City's interpretation of LAMC section 12.28 is not ripe for review in this action.

Retired ZA heard the application.

Petitioners argue that since ZA Landini was a retired ZA sitting by reason of a temporary contract with the City, he was not "subject to the civil service provisions of the Charter" and was not authorized to issue a judgment on the appeal. Real Party and Respondents disagree, asserting that Landini was a temporary city employee appointed by the Mayor at the request of the Office of Zoning Administration pursuant to City Charter section 1164(b) and was therefore an employee subject to the Charter's civil service provisions. The Court agrees with Real Party and Respondents' contentions.

Los Angeles City Charter section 1164 generally prohibits retired employees from being paid for further services rendered to the City, subject to the exception contained in section 1164(b).

Here, the parties agree that Landini was a retired ZA sitting by appointment of the Mayor at the request of the appointing authority. This does not mean, however, that he was

not subject to the civil service provisions of the Charter. Indeed, City Charter section 1164 appears to expressly contemplate that the employee would be subject to the civil service provisions. Petitioners provide no authority to the contrary.

Petitioners' alternative argument that the City improperly delegated its non-delegable duties to a private citizen is similarly unavailing. Landini was a retired ZA who was hired as a temporary ZA with the City pursuant to City Charter section 1164. He was not acting as a private citizen, but was acting as an employee in the proper classification to exercise the duties of the Office of Zoning Administration. See Los Angeles Charter § 561. This fact renders this case distinguishable from all of Petitioners' cited authorities.

On reply, Petitioners' argue for the first time that pursuant to City Charter section 561 ZA Landini needed to be authorized by the City Council to have authority to act as a ZA. See Reply, p. 9, lines 1-5. This argument fails for three reasons. First, it was not raised in Petitioners opening brief and was therefore waived. See *Balboa Ins. Co. v. Aguirre* (1983) 149 Cal. App.3d 1002, 1010 ("The salutary rule is that points raised in a reply brief for the first time will not be considered unless good cause is shown for the failure to present them before.") Second, it is Petitioners' burden to show that the facts support its position—i.e., that Landini was not appointed by the City Council. *Afford v. Pierno* (1972) 27 Cal.App.3d. 682, 691 ("[T]he burden of proof falls upon the party attacking the administrative decision to demonstrate wherein the proceedings were unfair, in excess of jurisdiction or showed prejudicial abuse of discretion.") Petitioners have not introduced *any* facts that would establish a lack of City Council authority for ZA Landini's appointment. Finally, Petitioners' argument is based on a misinterpretation of the City Charter. The Charter only required City Council approval for the *number* of authorized ZAs'; the actual appointments are made by the Director of Planning without any need for Council approval. See Los Angeles City

Charter, § 561 ("The duties of [the Office of Zoning Administration] shall be performed by one or more Zoning Administrators as authorized by the Council, who shall be appointed by the Director of Planning subject to the civil service provisions of the Charter.").

For all of these reasons, the Court concludes that the APC'S decision is not subject to attack due to Landini's status as a retired City employee working under a temporary contract.

Conclusion

Based on the foregoing, the Court grants the Petition for a Writ of Mandate directing the APC to set aside its decision approving the "adjustment" for Real Party's property on the grounds that this decision was not supported by the necessary findings. Otherwise, the petition and requests for declaratory relief are denied.

Counsel for Petitioners shall file and serve a proposed judgment within 10 days with a proof of service showing that it was served on Real Party and Respondents. The administrative record shall be returned to the party who lodged it, to be preserved without alteration until the judgment is final, and to be forwarded to the Court of Appeal in the event of an appeal.

Dated: 7-29-16

ROBERT H. O'BRIEN
Judge of the Superior Court

RHO/peh
Kottler vs. City of LA et al; Dec. on Pet. For Writ of Mandate: Granted in Part; 7-29-16

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H. LAND USE

H.1. LAND USE CONSISTENCY

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

IX.b): Would the project 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?

IX.c): Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

B. Introduction

This section addresses the consistency or compliance of proposed projects with the goals and policies of the General Plan and its elements, including the Framework Element, 35 adopted Community Plans, as well as the Planning and Zoning Code,[1] and any applicable specific plans, interim control ordinances (ICOs), community design overlay districts (CDOs), local coastal plans and redevelopment plans. City and regional utility plans and other adopted plans that contain environmental policies related to the physical environment that are applicable to the project activities and/or site may also be relevant.

C. Screening Criteria

- Is the project inconsistent with the General Plan or its elements, or an applicable specific plan, local coastal plan, redevelopment plan, interim control ordinance or adopted environmental goals or policies?

- Would the project require a General Plan amendment or zone change?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the

1 *Chapter 1 of the Los Angeles Municipal Code (LAMC).*

Significance Threshold for Land Use Consistency, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant impact on Land Use Consistency from the proposed project.

D. Evaluation of Screening Criteria

Review the proposed project for consistency with the General Plan and other adopted environmental goals and policies. Potential areas of inconsistency include, but are not limited to: land use type; height, bulk, design or density; waste or wastewater generation; resource consumption or degradation; and other plan policies that relate to the physical environment. Use the most recent Community Plan maps and Zone Information & Map Access System (ZIMAS) http://zimas.lacity.org/ to assist in identifying ordinances and plan areas that may pertain to the project site, or consult the Community Planning Bureau of the City Planning Department. As appropriate, evaluate the General Plan and its elements (including the Framework Element), Community Plans, specific plans, ICOs, CDO's, local coastal plans, redevelopment plans, Planning & Zoning Code, utility plans, and resource management plans. Identify and assess the project's consistency with applicable habitat conservation plans or natural community conservation plans. Consider whether policies are mandatory or guidance, and which is the agency with primary jurisdiction. Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; and

- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

- Community Plan land use and density designation;

- Zoning designation and other Planning and Zoning Code land use regulations relevant to the project site;
-
- Adopted ICOs, specific plan, redevelopment plan, CDO's local coastal plan or provisions of the Coastal Act, if any, applicable to the project site;

- Other City land use policies, such as the General Plan and Elements, including the Framework Element, Airport Hazard Zone Regulations, etc., if applicable to the project site; and

- Adopted City environmental policies, ordinances and plans, such as the City Solid Waste Management Policy Plan (CiSWMPP), Source Reduction and Recycling Element (SRRE), utility and resource conservation plans or programs, wastewater policies, Clean Air Program (CAP), etc., if any, applicable to the project site.

Project Impacts

Using the information from the Evaluation of Screening Criteria, evaluate the project for consistency with detailed local standards and requirements as well as with the broader context of the General Plan and its elements, environmental plans and policies, and regional utility/environmental plans. Identify project elements that conflict with the plans or policies and whether the conflict(s) would result in the project being inconsistent with the land use designation and/or environmental goals and policies of the City. Consider whether the project includes a proposed General Plan (land use) amendment and/or zone change, and whether all elements of the inconsistency have been addressed (i.e., density, design, etc.). For conflicts with environmental goals and policies, consider whether the project would interfere with the City's efforts to meet such goals, or be inconsistent with adopted policies.

Cumulative Impacts

Identify related projects in the vicinity of the proposed project and evaluate them in the same manner as the proposed project to determine if, when viewed together with the proposed project, conformance with the General Plan or other adopted plans or environmental policies would be significantly affected. Consider whether the combination of projects would conflict with the planned land uses and densities in the General Plan, or would interfere with adopted environmental goals and plans. Plans with a broad, regional perspective may be more applicable or useful in evaluating cumulative impacts because the goals and objectives of these plans may be implemented by comprehensive measures taken by government agencies.

Sample Mitigation Measures

Generally, a project determined to be inconsistent with the General Plan will require, as a condition of approval, a General Plan amendment or zone change to eliminate the inconsistency. This requires a finding that the requested change would not substantially alter the City's goals for the affected community. To mitigate an inconsistency prior to this determination, consider the following:

- Modify the project's proposed land uses to be consistent with designated land uses, zoning and/or General Plan and its element(s); or

- Relocate proposed structures or reduce the project's density/intensity to reduce conflicts or inconsistencies with the Land Use Element and plans.

3. DATA, RESOURCES, AND REFERENCES

The following references are available from the City Planning Department, Community Planning Bureau, 200 N. Spring St., 6th Floor, Los Angeles, California 90012. The Bureau may be reached at (213) 978-3893:

- General Plan and its elements, including the Framework Element and the 35 adopted Community Plans;
- District Zoning maps;
- ICOs;
- CDOs;
- Specific plans;
- Local coastal plans; and
- Airport Hazard Zone maps.

Planning and Zoning Code, (Chapter 1 of the LAMC) is available from the City Planning Department's Central Publications Unit at 200 N. Spring St., 5th Floor, Los Angeles, California 90012; Telephone: (213) 978-1255. For further information, call (213) 978-1310

Zone Information & Map Access System (ZIMAS) available online at: http://zimas.lacity.org.

Redevelopment plans are available from the Community Redevelopment Agency (CRA) of the City of Los Angeles, 354 South Spring Street, Suite 800, Los Angeles, California 90013; Telephone: (213) 977-1600.

City utility plans are available from the following City departments:

Department of Water and Power

- Utility Plans/Power Division
  111 North Hope Street, Room 1121
  Los Angeles, California 90012
  Telephone: (213) 367-0285

- Urban Water Management Plan
  Division of Public Affairs
  Telephone: (213) 367-1361

Department of Public Works
Bureau of Sanitation
- Wastewater plans
  Wastewater Engineering Service Division
  Telephone: (323) 342-6235

- Hyperion System
  Hyperion Treatment Plant
  Telephone: (310) 648-5000

CiSWMPP and SRRE are available from the Solid Resources Citywide Recycling Division of the Bureau of Sanitation, 433 South Spring Street, 5th Floor, Los Angeles, California 90013; Telephone: (213) 473-8228.

Southern California Association of Governments (SCAG) is the Metropolitan Planning Organization (MPO) for the region and offers resources and assistance. SCAG is located at 818 West Seventh Street, 12th Floor, Los Angeles, California 90017; Telephone: (213) 236-1800.

California Department of Fish and Game, South Coast Region, 4949 Viewridge Avenue, San Diego, CA 92123-1662; Telephone: (858) 467-4201.

H.2. LAND USE COMPATIBILITY

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Question

IX.a): Would the project physically divide an established community?

IX.b): Would the project 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?

IX.c): Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

B. Introduction

This section addresses the potential for projects or programs to create situations of incompatibility between land uses or activities. Such incompatibility may result from environmental impacts associated with the proposed land use. Examples of incompatibility include land uses, which create noise, odor, safety hazards, visual, or other environmental impacts which conflict with surrounding land uses and the activities and conditions typically associated with those land uses. In addition, a project may disrupt the physical arrangement of an established community by introducing new infrastructure or isolating land uses that could interrupt the typical activities or change the land use conditions in a community.

C. Screening Criteria

- Would the project include a land use type that is incompatible with existing or proposed adjacent land uses (due to size, intensity, density or type of use)?

- Would the project include features such as a highway, aboveground infrastructure, or an easement through an established neighborhood community that could cause a permanent disruption in the physical arrangement of that established community or otherwise isolate an existing land use?

- Would the project result in a "spot" zone?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Land Use Compatibility and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant Land Use Compatibility impact from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project, including the proposed land use or activity, and the size, density and intensity of the operation. Noise, odor, signage, safety hazards, traffic or other impacts may indicate an incompatibility with existing adjacent or surrounding land uses or current zoning for those sites, if vacant. Also, consider the types of land uses surrounding the project and the typical activities that occur at these sites, compared to those that would occur at the proposed project. Indicate the presence or lack of buffers between the project and adjacent land uses of other types. Note that a zone change required to implement the project may indicate a potential incompatibility with adjacent existing land uses. Review specific plans for urban design compatibility programs or regulations and their relevance to project design.

If the project includes elements such as a highway, aboveground infrastructure or an easement, identify the existing land uses that would be removed or would be adjacent to the new infrastructure. Determine the duration of any disruption of the physical arrangement of an established neighborhood or community. Such impacts may result from a physical separation or the creation of barriers that would disrupt the social or physical interaction between established land uses that comprise a neighborhood or community.

A "spot" zone occurs when the zoning or land use designation for only a portion of a block changes, or a single zone or land use designation becomes surrounded by more or less intensive land uses.

Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- The extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area;
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed project.

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, describe and map, as appropriate, the existing land uses and current zoning of the project site and the properties in the immediate vicinity of the proposed project. Also, identify uses near the site such as schools, libraries and residences which may be particularly sensitive to potential nuisance impacts (e.g., noise, odor, safety hazards) associated with the proposed project.

If the proposed project may disrupt or divide an established community, evaluate the existing neighborhoods or communities immediately surrounding the project. Address the type of land uses in the area, and the location of residences, businesses, schools, and other community facilities in relation to the proposed project and supporting residences.

Project Impacts

A significant land use compatibility impact may be indicated by the presence of one or more significant project impacts, which suggest that the location or intensity of the proposed project could conflict with existing uses. However, the presence of project impacts does not automatically indicate a land use compatibility impact and the effect of these impacts should be evaluated within the primary impact category (e.g., noise, traffic).

Evaluate the nature, extent and number of secondary impacts to determine the extent of any conflict between the project and existing uses in the area. Consider the type of activities typically expected to occur at land uses adjacent to the project and whether nuisance impacts from the proposed project would conflict with these activities.

If the proposed project would add such features as a highway, aboveground infrastructure or easement, determine the extent to which existing neighborhoods or communities would be impacted by its implementation. Evaluate the extent of the physical separation, barrier or other disruption of existing land uses or activities that could result from the proposed project. Indicate the duration of the disruption (e.g., long-term, permanent) of the physical or social interaction between land uses that comprise an established neighborhood or community.

Cumulative Impacts

The cumulative impact assessment should identify other known projects or land use changes proposed in the vicinity of the project that may either combine with the proposed project to create a land use incompatibility with the existing land uses, or be subject to nuisance impacts resulting from a proposed project that creates a land use incompatibility with the related projects. Evaluate the potential impacts using the methodology described above.

Sample Mitigation Measures

Mitigation measures to reduce secondary impacts are found in the individual sections (noise, traffic, etc.). Potential mitigation measures that may reduce land use compatibility impacts include:

- Change the project design, configuration, visual screening, setbacks, building heights, etc., to be compatible with surrounding uses;

- Restrict certain operational characteristics of the proposed use to reduce or eliminate impacts, such as limiting hours of operation or placing restrictions on specific types of uses or activities proposed for the project, etc.;

- Provide enclosed structures around certain activities that normally occur outdoors;

- Place aboveground infrastructure under ground, or grade separate key portions of the proposed highway, rail line, or other infrastructure to minimize physical separations;

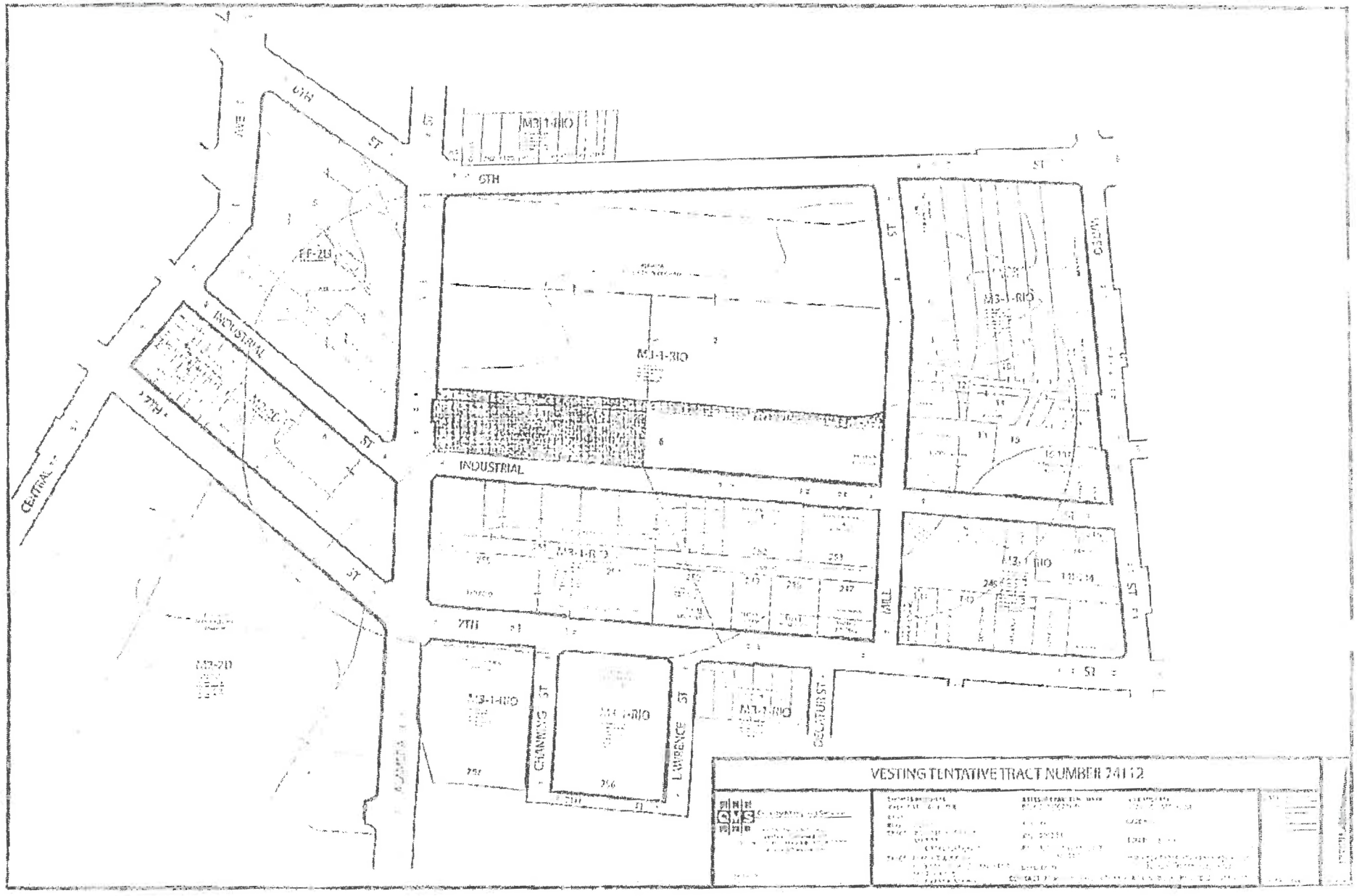
- Provide pedestrian and bicycle routes or crossings to increase mobility; and

- Provide a buffer (such as a decorative wall or landscaping) where residential uses are adjacent to non-residential uses.

3. DATA, RESOURCES, AND REFERENCES

City Planning Department, 201 North Figueroa Street, 3rd Floor, Los Angeles, California 90012; Telephone: (213) 977-6083. For plan check, first go to Counter A, 4th floor (Building and Safety). They will refer visitors to the Planning Department as appropriate.

See also H.1. LAND USE CONSISTENCY.



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M3-2D

EXHIBIT C

ENV-2013-2994-MND and MMP

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July 25, 2017

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SUBJECT: Errata to the Initial Study/Mitigated Negative Declaration for the Industrial Street Lofts Project, Case No. ENV-2013-2994-MND (1525 Industrial Street, Central City North Community Plan Area)

On June 16, 2016, and July 21, 2016, the Mitigated Negative Declaration (MND) for the Industrial Street Lofts Project was circulated for public review. The applicant has since changed the requested entitlements for the project as follows:

1. Pursuant to Los Angeles Municipal Code (LAMC) Section 11.5.6, a General Plan Amendment to the Central City North Community Plan to change the Project Site's land use designation to Regional Center Commercial, in lieu of Community Commercial as originally set forth in the MND;

2. Pursuant to LAMC Section 12.22 A.25(g)(2), an On-Menu Density Bonus Incentive for a 7% reduction in required open space, in lieu of a Director's Decision to allow a 7% reduction in required open space as originally set forth in the MND; and

3. Pursuant to LAMC Section 12.22 A.25(g)(3), an Off-Menu Waiver of Development Standards Incentive for reduced setbacks, in lieu of a Zoning Administrator's Adjustment to allow reduced setbacks as originally set forth in the MND.

The changes pertain solely to the type of discretionary approvals requested and would not result in physical changes to the project itself, which is still the demolition of the existing industrial building, loading dock, and freight truck/trailer storage area and the construction of an approximately 336,304 square-foot mixed-use project on a 2.59 acre site with 344 live/work units (299,302 square feet of floor area), 7,458 square feet of leasing/amenity area; 24,044 square feet of creative office uses, and 5,500 square feet of restaurant space.

Pursuant to Section 15073.5 of the State CEQA Guidelines, the recirculation of a mitigated negative declaration prior to adoption is required "when the document must be substantially revised after public notice of its availability has previously been given pursuant to Sections 15072, but prior to its adoption." As defined by Section 15073.5, a "substantial revision" means:

1. A new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance, or
2. The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required.

Moreover, Section 15073.5 of the State CEQA Guidelines provides that recirculation is not required under the following circumstances:

1. Mitigation measures are replaced with equal or more effective measures pursuant to Section 15074.1.
2. New project revisions are added in response to written or verbal comments on the project's effects identified in the proposed negative declaration which are not new avoidable significant effects.
3. Measures or conditions of project approval are added after circulation of the negative declaration which are not required by CEQA, which do not create new significant environmental effects and are not necessary to mitigate an avoidable significant effect.
4. New information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.

The modifications to the requested entitlements would not result in any physical changes to the project or to its construction or operation. As such, no new impacts upon the environment would occur. The project would be subject to the same mitigation measures as contained in the MND. Absent any changes to the physical project, the changes to the requested entitlements do not constitute a substantial revision pursuant to Section 15073.5. As such, the findings and conclusions of the supplemental analysis contained herein do not warrant recirculation of the MND.

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

INITIAL STUDY / MITIGATED NEGATIVE DECLARATION
Central City North Community Plan Area

DOCUMENT FILED
City Clerk's Office
No: MG-16-235-PL
Certified by
Date: 7-18-16

Industrial Street Lofts Project

Case Number: ENV-2013-2994-MND
CPC-2013-2993-GPA-VZC-HD-MCUP-ZAA-MSC-SPR
VTTM NO. 74112

Project Location: 1525 Industrial Street, Los Angeles, CA 90021
Council District: 14

Project Description: The Project would result in the demolition of the existing industrial building, loading dock, and freight truck/trailer storage area on the Project Site and the construction of an approximately 336,304 square-foot mixed-use project on a 2.59 acre site with 344 live/work units (299,302 square feet of floor area), 7,458 square feet of leasing / amenity area, 24,044 square feet of creative office uses, and 5,500 square feet of restaurant space. All of the live/work units would be classified by the Los Angeles Building Code (LABC) as R2 occupancy in accordance with LABC Section 419, to allow for the creation of arts and crafts or production in the work space and the capacity to accommodate up to 5 employees. The Proposed Project would result in a Floor Area Ratio (FAR) of 2.98:1 and requires a ministerial 22.5% density bonus to increase the maximum density from 282 to 344 units by providing 6% of the base density as Very Low Income units. The Project involves approximately 51,000 cubic yards of earth export for the excavation of one basement level of subterranean parking. The Project site is located in the Methane Buffer Zone and River Improvement Overlay District (RIO) and is bounded by South Alameda Street, an Avenue I to the west; Industrial Street, a Collector Street to the south; Mill Street, a Collector Street to the east; and Wholesale Street, a private street to the north.

The Project's discretionary requests include: (1) a General Plan Amendment to the Central City North Community Plan to change the Project Site's land use designation from Heavy Industrial to Community Commercial; (2) a Vesting Zone Change/Height District Change from M3-1-RIO (Heavy Manufacturing) to C2-2D-RIO (Commercial); (3) a Zoning Administrator's Adjustment for reduced setbacks; (4) a Master Conditional Use Permit for the sale of alcohol for onsite consumption in the proposed restaurants; (5) a Director's Decision for a 7% reduction in required residential open space; (6) a Vesting Tentative Tract Map to create airspace and ground lots, and (7) approval of Site Plan Review findings.

APPLICANT:	PREPARED BY:	ON BEHALF OF:
Camden USA, Inc.	Parker Environmental Consultants	The City of Los Angeles Department of City Planning Environmental Analysis Section

TABLE OF CONTENTS

I. INTRODUCTION

Introduction I-1
Mitigated Negative Declaration Form I-3
Summary of Mitigation Measures I-4

II. PROJECT DESCRIPTION

A. INTRODUCTION AND PROJECT SETTING II-1
B. PROJECT CHARACTERISTICS II-9
C. RELATED PROJECTS II-33

III. CEQA INITIAL STUDY CHECKLIST III-1

IV. ENVIRONMENTAL IMPACT ANALYSIS

1. AESTHETICS IV-1
2. AGRICULTURE IV-3
3. AIR QUALITY IV-5
4. BIOLOGICAL RESOURCES IV-18
5. CULTURAL RESOURCES IV-21
6. GEOLOGY AND SOILS IV-25
7. GREENHOUSE GAS EMISSIONS IV-32
8. HAZARDS AND HAZARDOUS MATERIALS IV-46
9. HYDROLOGY AND WATER QUALITY IV-52
10. LAND USE AND PLANNING IV-60
11. MINERAL RESOURCES IV-66
12. NOISE IV-67
13. POPULATION AND HOUSING IV-82
14. PUBLIC SERVICES IV-87
15. RECREATION IV-99
16. TRANSPORTATION/CIRCULATION IV-100
17. UTILITIES AND SERVICE SYSTEMS IV-126
18. MANDATORY FINDINGS OF SIGNIFICANCE IV-141

V. PREPARERS OF THE INITIAL STUDY AND PERSONS CONSULTED V-1

VI. REFERENCES, ACRONYMS AND ABBREVIATIONS VI-1

List of Figures

Figure II-1: Project Location Map ... II-2

Figure II-2: Aerial Photograph of the Project Site ... II-5

Figure II-3: Existing Site Photographs ... II-6

Figure II-4: Photographs of the Surrounding Land Uses ... II-7

Figure II-5: Existing and Proposed Lot Lines ... II-8

Figure II-6: Basement Floor Plan ... II-11

Figure II-7: Ground Floor Plan ... II-12

Figure II-8: Second Floor Plan ... II-13

Figure II-9: Third Floor Plan ... II-14

Figure II-10: Fourth Floor Plan ... II-15

Figure II-11: Fifth Floor Plan ... II-16

Figure II-12: Sixth Floor - Roof Plan ... II-17

Figure II-13: Seventh Floor – Roof Plan ... II-18

Figure II-14: Ground Floor Arts and Productive Uses Plan ... II-19

Figure II-15: Building Sections ... II-20

Figure II-16: Building Sections ... II-21

Figure II-17: Building Elevations ... II-24

Figure II-18: Illustrative Renderings of the Industrial Street Lofts Project ... II-25

Figure II-19: Concept Landscape Plan - Ground Floor ... II-26

Figure II-20: Concept Landscape Plan - Podium Level ... II-27

Figure II-21: Concept Landscape Plan - Parcel Two ... II-28

Figure II-22: Related Project Location Map ... II-39

Figure IV-1: Noise Monitoring and Sensitive Receptor Location Map ... IV-72

Figure IV-2: Future Without Project Traffic Volumes - AM Peak Hour ... IV-106

Figure IV-3: Future Without Project Traffic Volumes - PM Peak Hour ... IV-107

Figure IV-4: Project Only Traffic Volumes - AM Peak Hour ... IV-113

Figure IV-5: Project Only Traffic Volumes - PM Peak Hour ... IV-114

Figure IV-6: Future With Project Traffic Volumes - AM Peak Hour ... IV-115

Figure IV-7: Future With Project Traffic Volumes - PM Peak Hour IV-116

List of Tables

Table II-1: Summary of Project Site Area II-1
Table II-2: Proposed Development Program II-9
Table II-3: Summary of Required and Proposed Open Space Areas II-23
Table II-4: Summary of Required and Proposed Automobile Parking Spaces II-29
Table II-5: Related Projects List II-35
Table IV-1: Estimated Peak Daily Construction Emissions IV-8
Table IV-2: Existing Daily Operational Emissions from the Project Site IV-9
Table IV-3: Estimated Daily Operational Emissions IV-10
Table IV-4: Localized On-Site Peak Daily Construction Emissions IV-13
Table IV-5: Proposed Project Estimated Daily Localized Operational Emissions IV-14
Table IV-6: Climate Change Scoping Plan 2020 Emissions Target IV-36
Table IV-7: Proposed Project Construction-Related Greenhouse Gas Emissions IV-40
Table IV-8: Existing Project Site Greenhouse Gas Emissions IV-41
Table IV-9: Proposed Project Operational Greenhouse Gas Emissions IV-42
Table IV-10: Consistency with Applicable AB 32 Scoping Plan Measures IV-43
Table IV-11: Noise Range of Typical Construction Equipment IV-70
Table IV-12: Typical Outdoor Construction Noise Levels IV-71
Table IV-13: Existing Ambient Daytime Noise Levels in Project Site Vicinity IV-73
Table IV-14: Estimated Exterior Construction Noise at Nearest Sensitive Receptors IV-74
Table IV-15: Vibration Source Levels for Construction Equipment IV-78
Table IV-16: Community Noise Exposure (CNEL) IV-79
Table IV-17: 2017 Estimated AM Peak Hour Mobile Source Noise Levels IV-80
Table IV-18: 2017 Estimated PM Peak Hour Mobile Source Noise Levels IV-80
Table IV-19: SCAG's 2008 RTP Growth Forecast for the City of Los Angeles Subregion IV-84
Table IV-20: Project Estimated Population Generation IV-85
Table IV-21: Project Estimated Employment Generation IV-86
Table IV-22: Central City Police Station Crime Statistics IV-90

Table IV-23: Proposed Project Estimated Student Generation IV-92
Table IV-24: Recreation and Park Facilities Within the Project Area IV-94
Table IV-25: Los Angeles Public Libraries IV-95
Table IV-26: Projected Cumulative Student Population IV-98
Table IV-27: Level of Service as a Function of CMA Value or Average Vehicle Delay IV-102
Table IV-28: City of Los Angeles Significant Traffic Impact Criteria IV-102
Table IV-29: Existing Conditions – Intersection Level of Service IV-104
Table IV-30: Future Without Project Conditions - Intersection Level of Service IV-108
Table IV-31: Trip Generation Estimates – Daily Trips IV-110
Table IV-32: Trip Generation Estimates – AM Peak Hour IV-111
Table IV-33: Trip Generation Estimates –PM Peak Hour IV-112
Table IV-34: Existing With Project Conditions – Intersection Level of Service AM Peak Hour IV-117
Table IV-35: Future With Project Conditions – Intersection Level of Service PM Peak Hour IV-117
Table IV-36: Existing With Project Conditions – Unsignalized (Access) Intersection Analysis IV-118
Table IV-37: Future With Project Conditions – Intersection Level of Service AM Peak Hour IV-119
Table IV-38: Future With Project Conditions – Intersection Level of Service PM Peak Hour IV-119
Table IV-39: Future With Project Conditions – Unsignalized (Access) Intersection Analysis IV-120
Table IV-40: Proposed Project Estimated Water Demand IV-128
Table IV-41: Proposed Project Estimated Wastewater Generation IV-130
Table IV-42: Estimated Demolition and Construction Debris IV-136
Table IV-43: Expected Operational Solid Waste Generation IV-137

APPENDICES

APPENDIX A: AIR QUALITY MODELING WORKSHEETS

APPENDIX B: GEOTECHNICAL REPORT

LGC Geotechnical, Inc., Preliminary Geotechnical Subsurface Evaluation and Design Recommendations, Proposed Mix-Use Development, 1525 Industrial Street Los Angeles, California, January 9, 2013.

APPENDIX C: GREENHOUSE GAS EMISSIONS CALCULATIONS WORKSHEETS

APPENDIX D: METHANE REPORT

Tetra Tech BAS, Methane Site Testing 1525 Industrial Street, Downtown Los Angeles, January 8, 2013.

APPENDIX E: ENVIRONMENTAL SITE ASSESSMENT

Tetra Tech BAS, Environmental Site Assessment Report Proposed Arts District Development 1525 E. Industrial Street Los Angeles, California, January 2013.

APPENDIX F: NOISE MONITORING DATA

APPENDIX G: TRAFFIC STUDY

Mobility Group, Camden Arts Mixed-Use Project Traffic Study, Updated Trip Generation Tables, February 2016

LADOT Correspondence of Approval to the Department of City Planning, Supplemental Traffic Assessment for the Mixed Use Development at 1525 East Industrial Street [Revised], August 26, 2015.

Mobility Group, Camden Arts Mixed-Use Project Traffic Study, August 29, 2014 and Memorandum to the Traffic Study, dated August 4, 2015.

APPENDIX H: HISTORIC REPORT

PCR Services Corporation, Historical Resources Assessment Report, Union Ice Company (Union Central Cold Storage) Building, 1525 Industrial Avenue, Los Angeles, California, March 2015.

I. INTRODUCTION

The subject of this Initial Study/Mitigated Negative Declaration (IS/MND) is the proposed Industrial Street Lofts development. The Project would result in the demolition of the existing industrial building, loading dock, and freight truck/trailer storage area on the Project Site and the construction of an approximately 336,304 square-foot mixed-use project on a 2.59 acre site with 344 live/work units (299,302 square feet of floor area), 7,458 square feet of leasing / amenity area, 24,044 square feet of creative office uses, and 5,500 square feet of restaurant space. All of the live/work units would be classified by the Los Angeles Building Code (LABC) as R2 occupancy in accordance with LABC Section 419, to allow for creation of arts and crafts or production in the work space and the capacity to accommodate up to 5 employees. The Proposed Project would result in a Floor Area Ratio (FAR) of 2.98:1 and requires a ministerial 22.5% density bonus to increase the maximum density from 282 to 344 units by providing 6% of the base density as Very Low Income units. The Project involves approximately 51,000 cubic yards of earth export for the excavation of one basement level of subterranean parking. The Project site is located in the Methane Buffer Zone and River Improvement Overlay District (RIO) and is bounded by South Alameda Street, an Avenue I to the west; Industrial Street, a Collector Street to the south; Mill Street, a Collector Street to the east; and Wholesale Street, a private street to the north.

The Project's discretionary requests include: (1) a General Plan Amendment to the Central City North Community Plan to change the Project Site's land use designation from Heavy Industrial to Community Commercial; (2) a Vesting Zone Change/Height District Change from M3-1-RIO (Heavy Manufacturing) to C2-2D-RIO (Commercial); (3) a Zoning Administrator's Adjustment for reduced setbacks; (4) a Master Conditional Use Permit for the sale of alcohol for onsite consumption in the proposed restaurants; (5) a Director's Decision for a 7% reduction in required residential open space; (6) a Vesting Tentative Tract Map to create airspace and ground lots, and (7) approval of Site Plan Review findings.

PROJECT INFORMATION

Project Title:	Industrial Street Lofts
Project Location:	1525 Industrial Street, Los Angeles, CA 90013
Lead Agency:	City of Los Angeles, Department of City Planning 200 N. Spring Street, Room 621, Los Angeles, CA 90012
City Staff Contact:	Michael Sin, Planning Assistant (213) 978-1345
Applicant:	Camden USA, Inc., 15303 Ventura Boulevard, Suite 605, Sherman Oaks, CA 91403

ORGANIZATION OF THE INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

This IS/MND is organized into five sections as follows:

I. Introduction: This section (above) provides introductory information about the Project.

II. Project Description: This section provides a detailed description of the environmental setting and the Project, including Project characteristics, Project objectives, and environmental review requirements.

III. Initial Study Checklist: This section contains the completed Initial Study Checklist showing the significance level under each environmental impact category.

IV. Environmental Impact Analysis: Each environmental issue identified in the Initial Study Checklist contains an assessment and discussion of impacts associated with each subject area. When the evaluation identifies potentially significant effects, as identified in the Checklist, mitigation measures are provided to reduce such impacts to a less than significant level.

V. List of Preparers: This section provides a list of City personnel, other governmental agencies, and consultant team members that participated in the preparation of the IS/MND.

Attachments: Mitigation Measures Summary

Appendices: Includes various documents, technical reports, and information used in the IS/MND.

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY	**COUNCIL DISTRICT**
City of Los Angeles	14
PROJECT TITLE:	**CASE NO.**
Industrial Street Lofts Project	CPC-2013-2993-GPA-VZC-HD-MCUP-ZAA-MSC-SPR, VTT No. 74112, ENV-2013-2994-MND

PROJECT LOCATION: 1525 Industrial Street, Los Angeles, CA 90021

PROJECT DESCRIPTION: The Project would result in the demolition of the existing industrial building, loading dock, and freight truck/trailer storage area on the Project Site and the construction of an approximately 336,304 square-foot mixed-use project on a 2.59 acre site with 344 live/work units (299,302 square feet of floor area), 7,458 square feet of leasing / amenity area, 24,044 square feet of creative office uses, and 5,500 square feet of restaurant space. All of the live/work units would be classified by the Los Angeles Building Code (LABC) as R2 occupancy in accordance with LABC Section 419, to allow for the creation of arts and crafts or production in the work space and the capacity to accommodate up to 5 employees. The Proposed Project would result in a Floor Area Ratio (FAR) of 2.98:1 and requires a ministerial 22.5% density bonus to increase the maximum density from 282 to 344 units by providing 6% of the base density as Very Low Income units. The Project involves approximately 51,000 cubic yards of earth export for the excavation of one basement level of subterranean parking. The Project site is located in the Methane Buffer Zone and River Improvement Overlay District (RIO) and is bounded by South Alameda Street, an Avenue I to the west; Industrial Street, a Collector Street to the south; Mill Street, a Collector Street to the east; and Wholesale Street, a private street to the north.

The Project's discretionary requests include: (1) a General Plan Amendment to the Central City North Community Plan to change the Project Site's land use designation from Heavy Industrial to Community Commercial; (2) a Vesting Zone Change/Height District Change from M3-1-RIO (Heavy Manufacturing) to C2-2D-RIO (Commercial); (3) a Zoning Administrator's Adjustment for reduced setbacks; (4) a Master Conditional Use Permit for the sale of alcohol for onsite consumption in the proposed restaurants; (5) a Director's Decision for a 7% reduction in required residential open space; (6) a Vesting Tentative Tract Map to create airspace and ground lots, and (7) approval of Site Plan Review findings.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
Camden USA, Inc., C/O Ben Brosseau
15303 Ventura Boulevard, Suite 605
Sherman Oaks, CA 91403

FINDING: The City Planning Department of the City of Los Angeles has proposed that a Mitigated Negative Declaration be adopted for this project because the mitigation measure(s) outlined on the attached page(s) will reduce any potential significant adverse effects to a level of insignificance.

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED

Any written comments received during the public review period are attached together with the response of the Lead City Agency. The project decision-maker may adopt the Mitigated Negative Declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING FORM	**TITLE**	**TELEPHONE NUMBER**
Michael Sin	Planning Assistant	(213) 978-1345
ADDRESS	**SIGNATURE (Official)**	**DATE**
200 North Spring Street, Room 621 Los Angeles, CA 90012	Blake Lamb	August 22, 2016

SUMMARY OF MITIGATION MEASURES

1. AESTHETICS

No Mitigation Measures are required.

2. AGRICULTURE

No Mitigation Measures are required.

3. AIR QUALITY

4. BIOLOGICAL RESOURCES

No mitigation measures are required.

5. CULTURAL RESOURCES

No mitigation measures are required.

6. GEOLOGY AND SOILS

No mitigation measures are required.

7. GREENHOUSE GAS EMISSIONS

No mitigation measures are required.

8. HAZARDS

8-1 **Hazardous Materials Site.** The Applicant shall comply with the following recommendations as specified in the Phase I Environmental Site Assessment (ESA) in the design and construction of the Industrial Street Lofts Project to the satisfaction of the Department of Building and Safety:

- Based on the results of the ESA no further inquiry and/or investigation of the subject property is considered practical at this time, and thus none are recommended. However, the Applicant should be aware that isolated pockets of impacted subsurface soil may be encountered during construction and, if encountered, are likely to affect the construction schedule for the planned development. In addition, the unknown underground feature, encountered by BAS, will require further assessment and removal. Should this feature be confirmed to be an underground storage tank, a specialized contractor shall be retained to handle the decommissioning and removal of the tank and associated impacted soil, if any.
- In the event that the current owners leave the facility "as is" (i.e., all existing equipment, chemicals, debris, waste, etc., will remain at the site and thereby become the property of Camden upon taking possession of the property), the applicant shall retain the services of a qualified demolition contractor, experienced in handling items, which may contain

a qualified demolition contractor, experienced in handling items, which may contain regulated substances and thus require proper draining/ containerization and subsequent disposal/recycling.

- Should existing engineered fill under Freezer #5 be re-used at the site (based on geotechnical recommendations), the fill soil shall be tested in order to assess whether it meets the residential land use criteria.
- A construction contingency plan for dealing with both anticipated and potential occurrences of environmentally sensitive situations during site redevelopment shall be established and adhered to during construction.

9. HYDROLOGY/WATER QUALITY

No mitigation measures are required.

10. LAND USE

10-1 Land Use/Planning

- An air filtration system shall be installed and maintained with filters meeting or exceeding the ASHRAE Standard 52.2 Minimum Efficiency Reporting Value (MERV) of 11, to the satisfaction of the Department of Building and Safety.

11. MINERAL RESOURCES

No mitigation measures are required.

12. NOISE

12-1 Increased Noise Levels (Demolition, Grading, and Construction Activities)

- Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday and national holidays.
- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices.
- Noise and groundborne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.
- Barriers such as, but not limited to, plywood structures or flexible sound control curtains extending eight feet in height shall be erected around the perimeter of the construction site to minimize the amount of noise during construction on the nearby noise-sensitive uses.

12-2 Increased Noise Levels (Mixed-Use Development)

- Wall and floor-ceiling assemblies separating commercial tenant spaces, residential units, and public places, shall have a Sound Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413.

12-3 Increased Noise Levels (Parking Structure Ramps)

- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.

13. POPULATION AND HOUSING

No mitigation measures are required.

14. PUBLIC SERVICES: FIRE PROTECTION

Fire

14-1 The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features:

- Fire lanes, where required, shall be a minimum of 20 feet in width;
- All structures must be within 300 feet of an approved fire hydrant; and
- Entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

14-2 Prior to plan check review, the Project Applicant shall consult with the Los Angeles Fire Department regarding the installation of public and/or private fire hydrants, sprinklers, access, and/or other fire protection features within the Project. All required fire protection features shall be installed to the satisfaction of the Los Angeles Fire Department.

Police

14-3 Public Services (Police – Demolition/Construction Sites)

- Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

14-4 Public Services (Police)

- The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking

facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

Schools

No mitigation measures are required.

Parks

No mitigation measures are required.

15. RECREATION

No mitigation measures are required.

16. TRANSPORTATION

16-1 Transportation/Traffic

- A Construction work site traffic control plan shall be submitted to DOT for review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction related traffic shall be restricted to off-peak hours.
- All delivery truck loading and unloading shall take place on site.
- The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.
- Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

17. PUBLIC UTILITIES

Water

17-1 Utilities (Local Water Supplies - Landscaping)

- In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:
    - Weather-based irrigation controller with rain shutoff
    - Matched precipitation (flow) rates for sprinkler heads
    - Drip/microspray/subsurface irrigation where appropriate
    - Minimum irrigation system distribution uniformity of 75 percent
    - Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials
    - Use of landscape contouring to minimize precipitation runoff
- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for existing and expanded irrigated landscape areas totaling 5,000 square feet and greater.

17-2 Utilities (Local Water Supplies - All New Construction)

- If conditions dictate pursuant to the LAMC, the Department of Water and Power may postpone new water connections for this project until water supply capacity is adequate.
- Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate.
- Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.
- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for all landscape irrigation uses.
- Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

17-3 Utilities (Local Water Supplies - New Commercial or Industrial)

- All commercial restroom faucets shall be of a self-closing design.

17-4 Utilities (Local Water Supplies - New Residential)

- Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.
- Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such

appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the Applicant shall be responsible for ensuring compliance.

- Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the Applicant shall be responsible for ensuring compliance.

Solid Waste

No mitigation measures are required.

18. MANDATORY FINDINGS OF SIGNIFICANCE

No mitigation measures are required.

II. PROJECT DESCRIPTION
A. INTRODUCTION AND PROJECT SETTING

1. Introduction

The Applicant, Camden USA, Inc. is seeking to develop the mixed-use, live-work project described below (the "Industrial Lofts Project" or "Proposed Project"). Acting as lead agency, the Planning Department required preparation of this Initial Study/Mitigated Negative Declaration ("IS/MND") to consider the potential project-specific and cumulative environmental impacts of the Industrial Street Lofts project.

2. PROJECT LOCATION

The site of the Industrial Street Lofts Project comprises two parcels (Parcel 1 and Parcel 2) located within the South Industrial Area of downtown Los Angeles, within the boundaries of the Central City North Community Plan Area. As shown in Figure II-1, Project Location Map, the Project Site includes approximately 112,843 square feet (2.59 acres) of lot area (main site area after roadway dedications), and is generally bounded by Alameda Street to the west, Industrial Street to the south, and commercial and industrial buildings to the east, and includes the length of Wholesale Street to the north from Alameda Street to Mill Street on the east. The Project Site's property addresses, Assessor's Parcel Numbers (APN), existing land uses, and lot areas are summarized in Table II -1, Summary of Project Site Area, below:

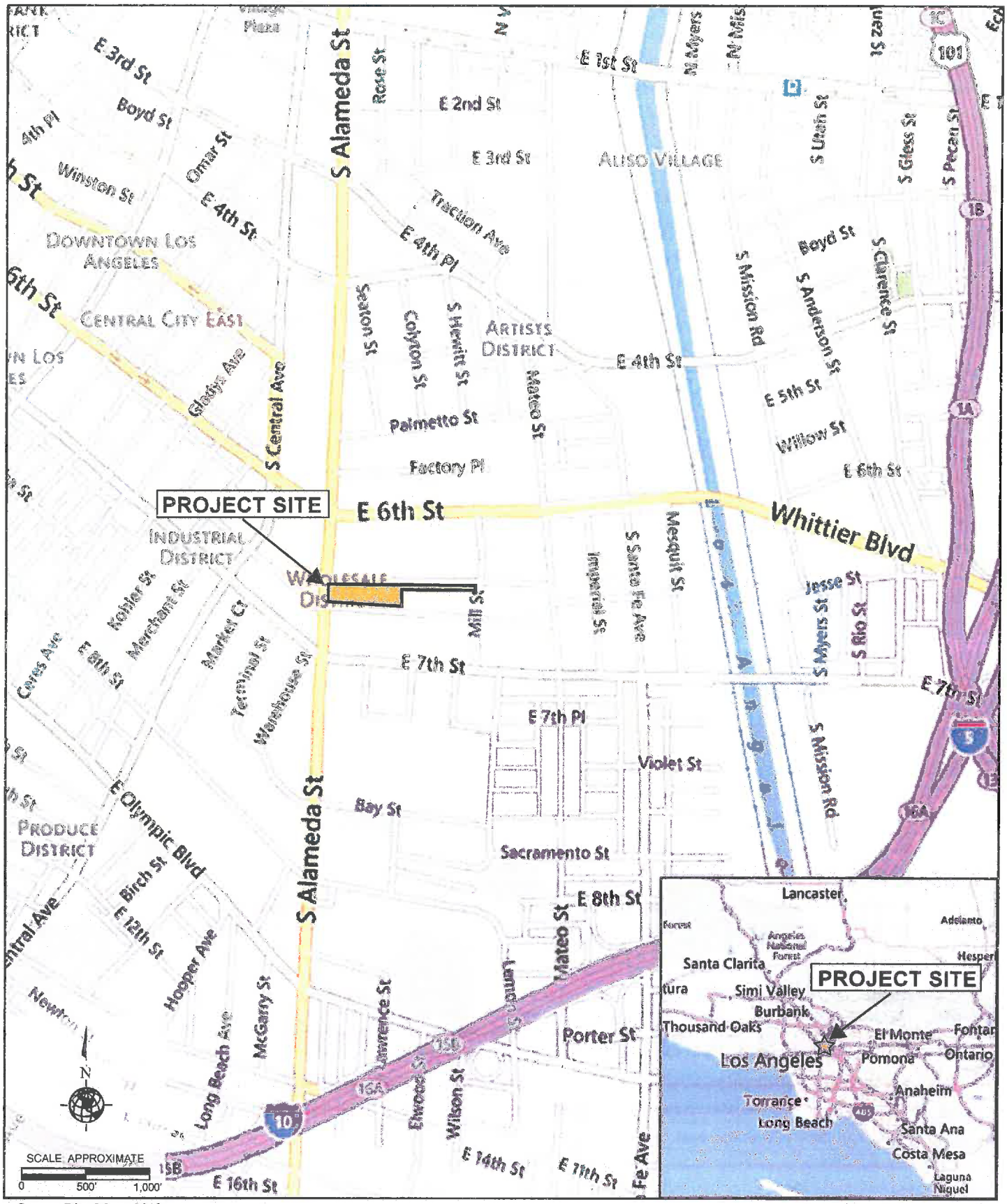
Table II -1
Summary of Project Site Area

Proposed Ground Parcel	Address	APN	Existing Land Use	Lot Area (square feet)[a]	
				Current	Post-VTTM
Parcel 1	1525 Industrial St.	5164-010-007	Union Central Cold Storage Loading Dock	78,988	101,089
Parcel 2	No Address	5164-010-0008	Freight Truck and Trailer Storage Area	35,860	13,759
			Total Lot Area	114,848	114,848

[a] *Lot area is expressed as net lot area, excluding street easements, before dedications.*
Source: Camden, March 12, 2014.

3. REGIONAL AND LOCAL ACCESS

Primary regional access to the Project Site is provided by the Hollywood Freeway (US-101) and the Santa Monica Freeway (I- 10). The Hollywood Freeway runs in a north-south direction east of the Project Site, while the Santa Monica Freeway runs in an east-west direction south of the Project Site. These two freeways also provide access to the Harbor Freeway (I-110) to the west, to the Santa Ana (I-5) freeway to the south, to the Golden State Freeway (I-5) to the north, and to the San Bernardino (I-10) and Pomona (SR-60) freeways to the east.



Source: Bing Maps, 2013

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Figure II-1
Project Location Map

Local street access is provided by the grid roadway system adjacent to the Project Site and in the surrounding area. S. Alameda Street, which borders the Project Site to the west, is a two-way north-southbound street providing two travel lanes in each direction. It is classified as an Avenue I. Industrial Street, which borders the Project Site to the south, is a two-way east-westbound street providing one travel lane in each direction in the vicinity of the Project Site. It is classified as a Collector Street. Mill Street, located east of the Project Site, is a two-way north-southbound street that provides one lane of travel in each direction. It is classified as a Collector Street. Wholesale Street, located north of the Project Site, is an east-westbound private street that connects the Project Site from Mill Street to Alameda Street.

Public Transit

The Project Site is also located near regional transit in the Los Angeles area. The Project Area is currently served by two MTA Rapid Bus Lines, including lines 720 and 760, and five MTA Local Bus Lines, including lines 18, 53, 60 and 62. These lines provide connections to the downtown subway stations, which include Pershing Square and 7th Street/Metro Center.[1] Additionally, the Greyhound Bus Terminal is located one block south of the Project Site on 7th Street, which provides inter-city bus service to various locations outside of the Los Angeles area.

The Project Site is also served by the Metro Gold Line light rail system located at the Little Tokyo/Arts District station near 1st Street and Alameda Street, approximately one mile to the north. The Metro Gold Line offers service to East Los Angeles to the east and Pasadena to the northeast. The Metro Gold Line connects to Union Station, providing access to Metrolink, the Metro Silver Bus Line, and Metro Rail Red and Purple Lines.

DASH Downtown Route A bus stops at 3rd Street and Alameda Street and travels through the Arts District, while providing access to the Civic Center, major locations in the core of downtown Los Angeles, the Financial District, and Central City West. DASH Route A bus line also connects to the Metro's Expo, Red, Purple and Blue rail lines at the 7th Street/Metro Center.

4. ZONING AND LAND USE DESIGNATIONS

The Project Site is located within the Central City North Community Plan Area of the City of Los Angeles. The Project Site is zoned M3-1-RIO with a General Plan Land Use designation of Heavy Manufacturing. The corresponding zones for Heavy Manufacturing include the M3 Zone. The M3-1 designation indicates that the Project Site is located in Height District 1, which does not specify a building height limit, but rather limits floor area ratio ("FAR") on the Project Site to 1.5:1. The RIO designation is for the City's River Improvement Overlay (RIO) district, which is designed to provide for

---

[1] *Los Angeles County Metropolitan Transportation Authority, website: http://www.metro.net/riding_metro/maps/images/System_Map.pdf, accessed June 2013.*

preservation of tributaries and rivers in the City of Los Angeles by promoting river identity, supporting local species, guiding urban design and mobility access, among many other things.[2]

The Project is also within the East Los Angeles State Enterprise Zone.[3] The Federal, State, and City governments provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services. The Enterprise Zone (EZ) special provisions applicable to plan check relate to parking standards and height.

5. EXISTING CONDITIONS

As shown in Figure II-2, Aerial Photograph of the Project Site, the Project Site is currently improved with an industrial building, loading dock, and freight truck and trailer storage area. Vehicular access is currently provided from a driveway along Industrial Street, a driveway along Alameda Street, and a driveway along Mill Street. No vegetation currently exists on the Project Site. Photographs depicting the current conditions of the Project Site are provided in Figure II-3, Photographs of the Project Site.

6. SURROUNDING LAND USES

The properties surrounding the Project Site for the Industrial Street Lofts Project include industrial, commercial/retail, office, restaurant, industrial buildings adapted for live/work uses, and parking lots. Photographs of the land uses immediately surrounding the Project Site are provided in Figure II-4, Photographs of Surrounding Land Uses.

To the west of the Project Site, across S. Alameda Street, is the Los Angeles County Metropolitan Transportation Authority - Division 1 Compressed Natural Gas Fueling Station (see Figure II-4, View 7). Properties to the west are zoned PF-2D and M2-2D. Directly east of the Project Site, and east of Mill Street, are one- to two-story industrial, commercial/retail, office buildings and surface parking (see Figure II-4, View 9, 10 and 12). To the immediate north of the Project Site, adjacent to Wholesale Street, are one-story industrial and commercial buildings (See Figure II-4, View 8). To the south of the Project Site, across Industrial Street, are one- to two-story industrial, commercial/retail, office buildings, and surface parking (see Figure II-4, View 11). Properties to the north, south, and east are zoned M3-1-RIO.

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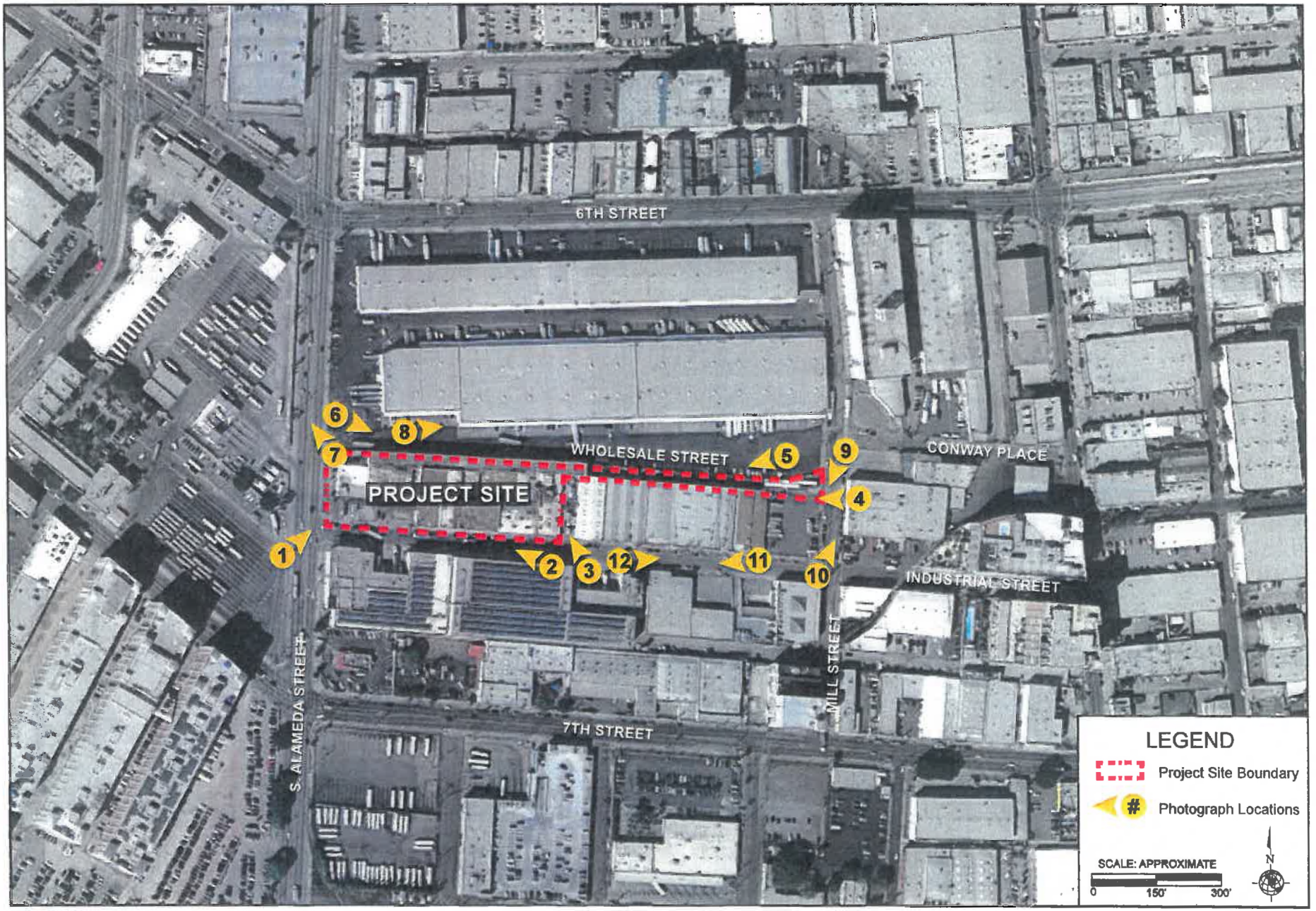
[2] *Zoning Information No. 2358 and City of Los Angeles Ordinance Nos. 183144 and 183145.*

[3] *City of Los Angeles Department of City Planning, Zoning Information and Map Access System, website: http://zimas.lacity.org/.*



Source: Google Earth, Aerial View, 2013

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Figure II-2
Aerial Photograph of the Project Site



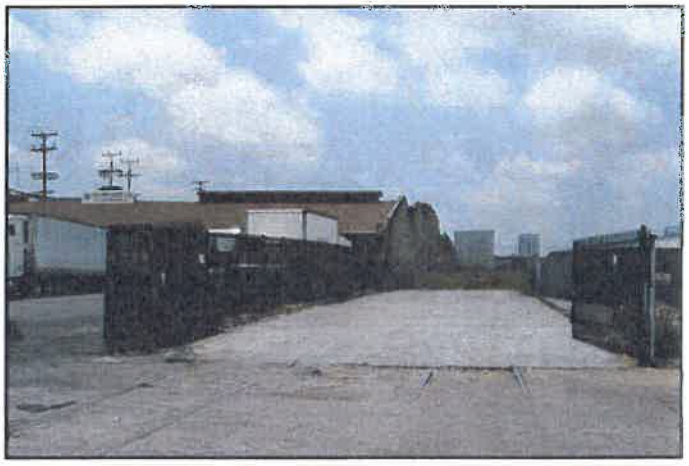
View 1: From the southwest corner of S. Alameda Street and Industrial Street looking northeast at the Project Site.



View 2: From the south side of Industrial Street looking northwest at the Project Site.



View 3: From the south side of Industrial Street looking north at the Project Site.



View 4: From the east side of Mill Street looking west at the Project Site.



View 5: From the north side of Wholesale Street looking southwest at the Project Site.



View 6: From the northeast corner of S. Alameda Street and Wholesale Street looking southeast.

Source: Parker Environmental Consultants, 2013

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Figure II-3
Photographs of the Project Site



View 7: From the east side S. Alameda Street looking northwest.



View 8: From the north side of Wholesale Street looking north-east.



View 9: From the southeast corner of Mill Street and Conway Place looking southwest.



View 10: From the southwest corner of Mill Street and Industrial Street looking northeast.



View 11: From the north side of Industrial Street looking west.



View 12: From the south side of Industrial Street looking east.

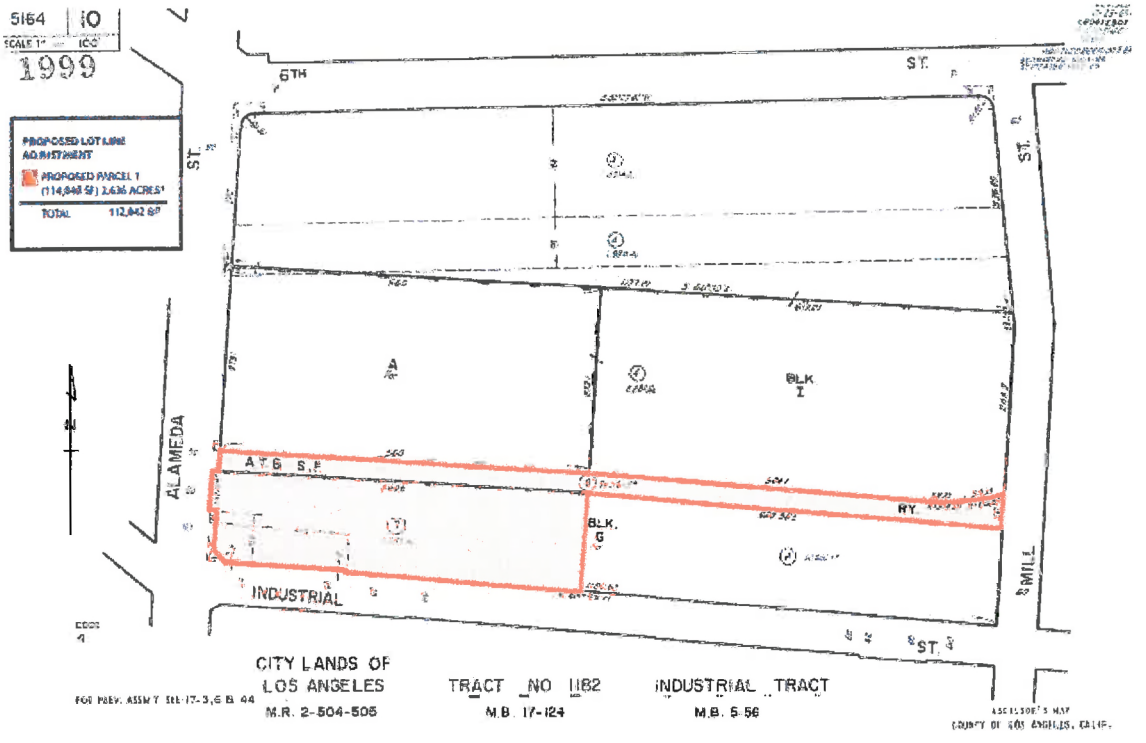
Source: Parker Environmental Consultants, 2013

PARKER ENVIRONMENTAL CONSULTANTS

Figure II-4
Photographs of Surrounding Land Uses



LOT LINE SUMMARY - EXISTING



LOT LINE SUMMARY - PROPOSED

Source: Lorcan O' Herlihy Architects, March 31, 2016

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Figure II-5
Existing and Proposed Lots

II. PROJECT DESCRIPTION
B. PROJECT CHARACTERISTICS

1. DEVELOPMENT PROGRAM

The requested approvals for the Proposed Project include a Vesting Tentative Tract Map to create airspace and ground lots as shown in Figure II-5, Existing and Proposed Lots. The Proposed Project would result in the demolition of the existing industrial building, loading dock, and freight truck/trailer storage area on the Project Site and the construction of a 336,304 square-foot mixed-use project with 344 live/work units (299,302 square feet of floor area), 7,458 square feet of leasing / amenity area, 24,044 square feet of creative office uses, 5,500 square feet of restaurant space. All of the live/work units would be classified under Section 419 of the Los Angeles Building Code as R2 occupancy to allow for the creation of arts and crafts or production in the work space and the capacity to accommodate up to 5 employees.

A summary of the Proposed Project with the proposed land uses and floor area for each proposed ground lot is provided in Table II-2, Proposed Development Program, below. As shown in Table II-2, below, the Proposed Project would result in a Floor Area Ratio (FAR) of 2.98:1

Table II-2
Proposed Development Program

Land Uses	Live/Work Units	Floor Area (sf) [a]
Lot 1:		
Live/Work Units	344	**299,302 sf**
Commercial		
Creative Office	--	*18,854 sf*
Restaurant	--	*2,568 sf*
Subtotal Commercial	--	**21,422sf**
Leasing/Amenity	--	**7,458 sf**
Subtotal Lot 1		**328,182 sf**
Lot 2 (Flag Lot):		
Restaurant	--	2,932 sf
Creative Office	--	5,190 sf
Subtotal Lot 2		**8,122 sf**
TOTAL (Lots 1 and 2)		**336,304 sf**
		2.98:1 FAR

Notes: sf = square feet; avg. = average
[a] *Floor area includes common support and circulation areas that contribute towards the Project's floor area as defined by the LAMC.*
Source: Lorcan O' Herlihy Architects (LOHA) and TCA Architects, April 26, 2016.

Live/Work Uses

The Proposed Project includes up to 344 live/work units within a seven-story structure totaling approximately 299,302 square feet of floor area. The units would vary in size from approximately 550 square feet to 1,277 square feet.

Commercial Uses

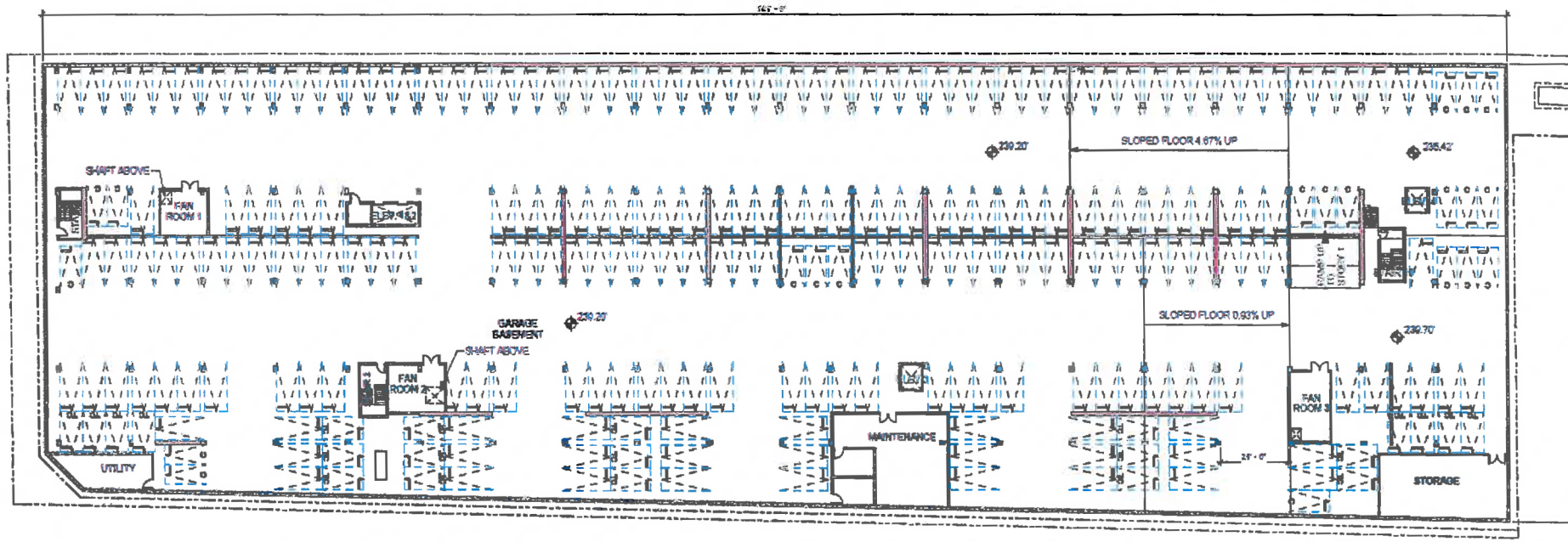
The Proposed project would include a total of 29,544 square feet of commercial uses including 24,044 square feet of creative office uses and 5,500 square feet of restaurant uses. Proposed Lot 1 would include up to 21,422 square feet of neighborhood and project-serving commercial uses, consisting of 18,854 square feet of creative office space and 2,568 square feet of restaurant space on the ground level of the structure on Proposed Lot 1. The Proposed Flag Lot (Lot 2) would be developed with 5,190 square feet of creative office uses and 2,932 square feet of restaurant space with outdoor dining.

The basement level and ground floor level on Proposed Lot 1 are depicted in Figures II-6 through II-7, respectively. The various plans for the second through seventh levels on Proposed Lot 1 are depicted in Figures II-8 through II-13. The arts and productive uses plan is shown in Figure II-14, Ground Floor Arts and Productive Uses.

2. FLOOR AREA AND BUILDING HEIGHT

The current zoning and density on the property M3-1-RIO limits the total floor area on the site to an FAR of 1.5:1. The Industrial Street Lofts Project would seek a Zone Change to C2-2D-RIO, with the D limitation limiting the FAR to 3:1. The Industrial Street Lofts Project includes 336,304 square feet of development, which results in an FAR of 2.98:1.

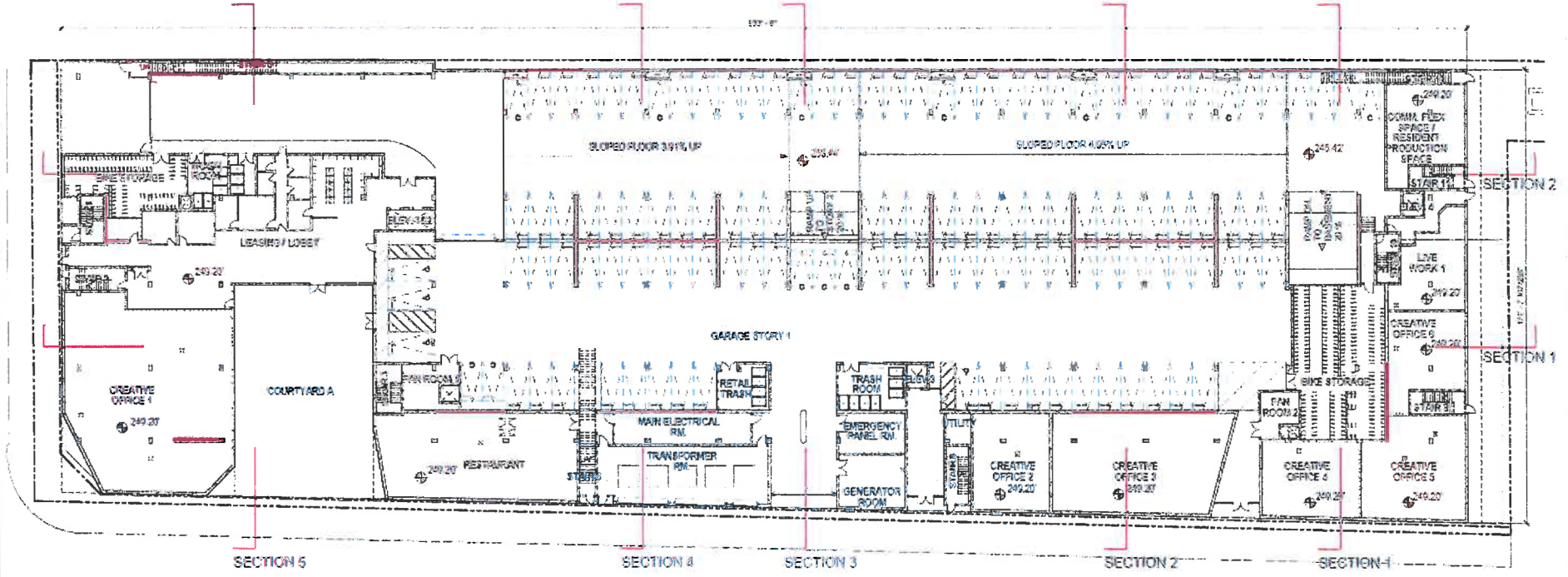
The building on Proposed Lot 1 would be seven stories (a maximum of approximately 85 feet above grade) of wood frame construction over Type 1 podium with two above grade garage levels aligned with one commercial story (approximately 22 feet above grade) over one basement garage level. The buildings on the Proposed Flag Lot (Lot 2) would be one story (approximately 20 feet above grade). The proposed building height is depicted in Figure II -15 and Figure II-16, Building Sections.



Source: Lorcan O' Herlihy Architects, March 31, 2016.

PARKER ENVIRONMENTAL CONSULTANTS

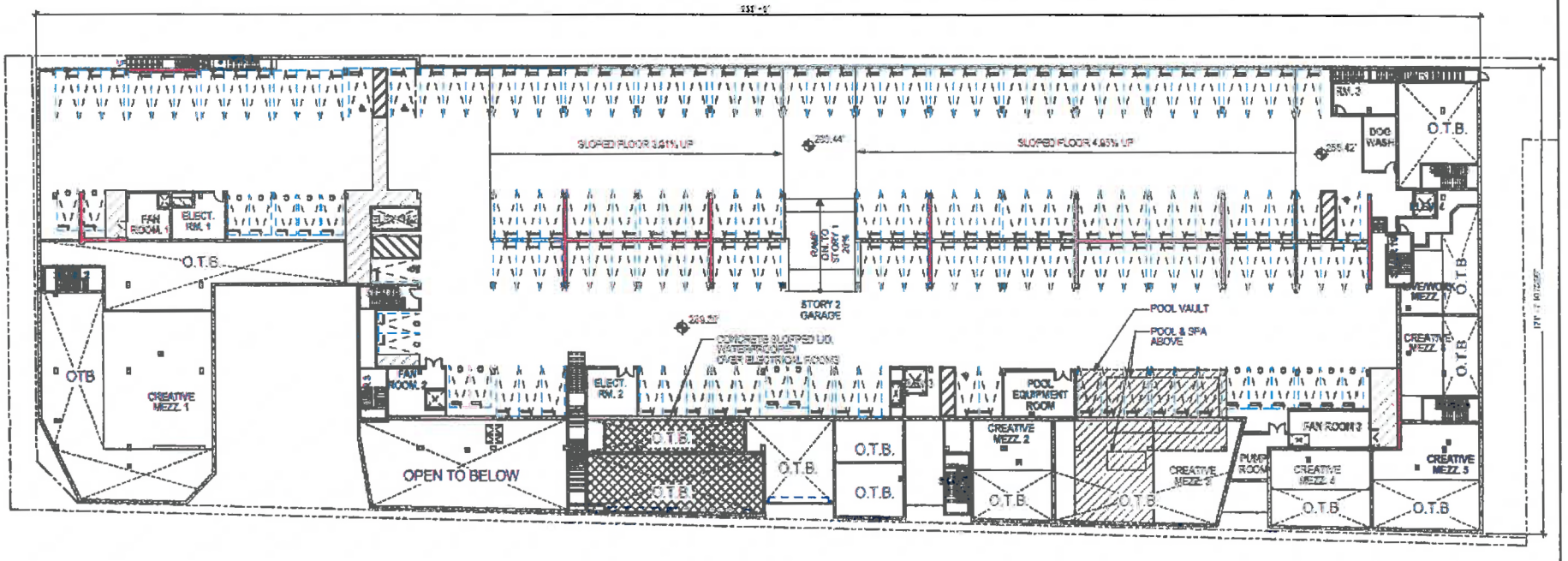
Figure II-6
Basement Floor Plan



Source: Lorcan O' Herlihy Architects, March 31, 2016.

PARKER ENVIRONMENTAL CONSULTANTS

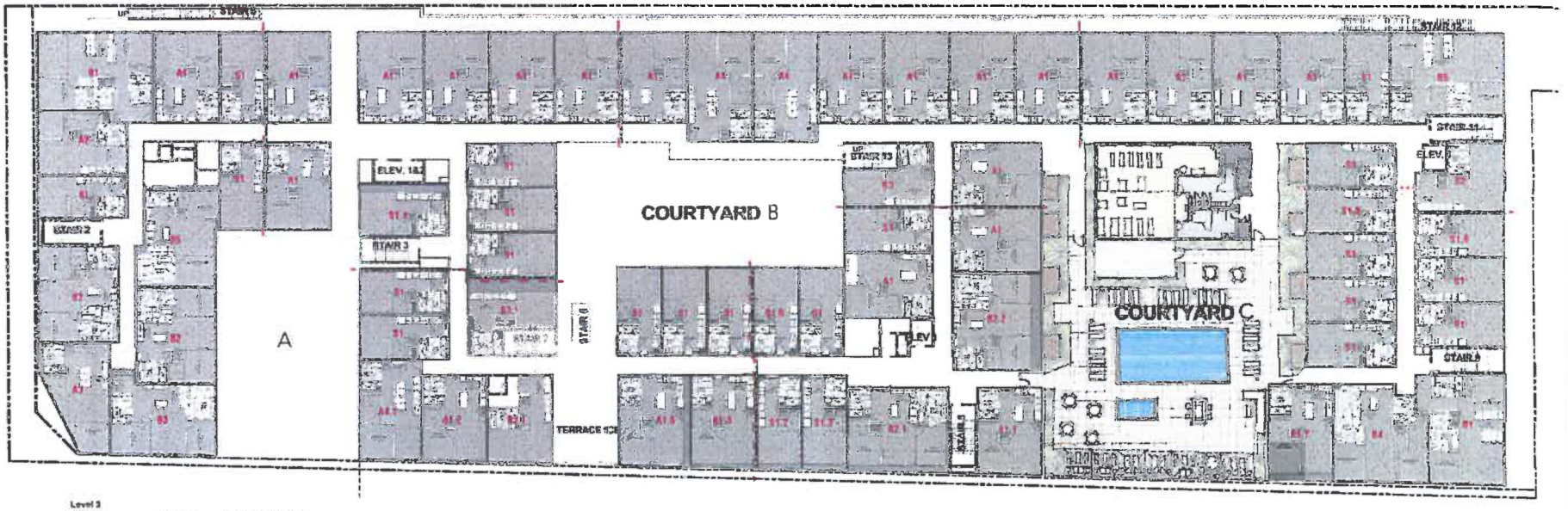
Figure II-7
Ground Floor Plan



Source: Lorcan O' Herlihy Architects, March 31, 2016.

PARKER ENVIRONMENTAL CONSULTANTS

Figure II-8
Second Floor Plan



Level 3	Unit Type	Number of units
	S1	23
	S2	2
	S3	2
Unit TypeTotal		33
	A1	35
	A2	1
	A3	1
	A4	2
Unit TypeTotal		25
	B1	2
	B2	4
	B3	1
	B4	1
	B5	1
	B6	1
	B7	0
Unit TypeTotal		10
Total		69

Source: Lorcan O' Herlihy Architects, March 31, 2016.

PARKER ENVIRONMENTAL CONSULTANTS

Figure II-9
Third Floor Plan



Level 4	Unit type	Number of units
	S1	26
	S2	7
	S3	2
Unit Type Total		35
	A1	25
	A2	1
	A3	0
	A4	3
Unit Type Total		29
	B1	2
	B2	4
	B3	1
	B4	1
	B5	1
	B6	1
	B7	0
Unit Type Total		10
Total		69

Source: Lorcan O' Herlihy Architects, March 31, 2016.

PARKER ENVIRONMENTAL CONSULTANTS

Figure II-10
Fourth Floor Plan



Level 5	Unit type	Number of units
	S1	26
	S2	2
	S3	2
Unit TypeTotal		30
	A1	25
	A2	1
	A3	0
	A4	4
Unit TypeTotal		30
	B1	3
	B2	4
	B3	1
	B4	1
	B5	1
	B6	1
	B7	1
Unit TypeTotal		11
Total		71

Source: Lorcan O' Herlihy Architects, March 31, 2016.

PARKER ENVIRONMENTAL CONSULTANTS

Figure II-11
Fifth Floor Plan



Level 6	Unit type	Number of units
	S1	26
	S2	7
	S3	2
Unit TypeTotal		36
	A1	23
	A2	1
	A3	0
	A4	3
Unit TypeTotal		27
	B1	2
	B2	3
	B3	2
	B4	1
	B5	1
	B6	1
	B7	2
Unit TypeTotal		12
Total		**69**

Source: Lorcan O' Herlihy Architects, March 31, 2016.

PARKER ENVIRONMENTAL CONSULTANTS

Figure II-12
Sixth Floor / Roof Plan



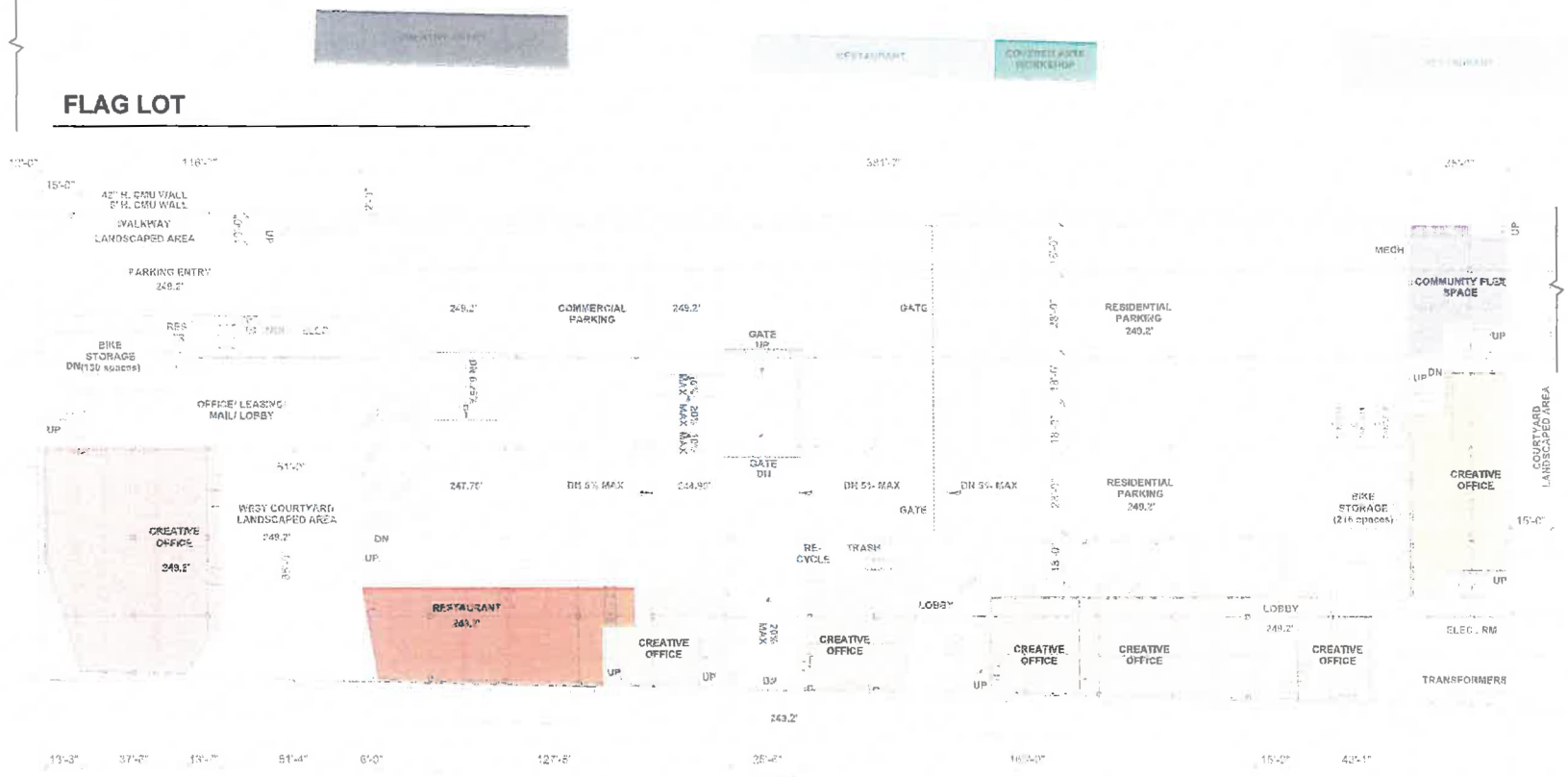
Level 7

Unit type	Number of units
S1	28
S2	3
S3	2
Unit TypeTotal	33
A1	23
A2	0
A3	0
A4	2
Unit TypeTotal	25
R1	1
R2	3
R3	2
R4	1
R5	1
R6	0
R7	2
Unit TypeTotal	10
Total	85

Source: Lorcan O' Herlihy Architects, March 31, 2016.

PARKER ENVIRONMENTAL CONSULTANTS

Figure II-13
Seventh Floor / Roof Plan



ARTS & PRODUCTIVE SPACE

REQUIRED RATIO PER LIVE/WORK UNITS		#	AREA
LIVE-WORK UNITS 1 TO 50: 150 SF		50	7,500
LIVE-WORK UNITS 51 TO 100: 100 SF		50	5,000
LIVE-WORK UNITS IN EXCESS OF 100: 50 SF		246	12,300
TOTAL REQUIRED		346	24,800

OCCUPANCY			AREA
ALAMEDA ST. CREATIVE OFFICE, INCL. 50% MEZZ.			7,010
INDUSTRIAL ST. CREATIVE OFFICE, INCL. 50% MEZZ.			10,256
PASEO CREATIVE OFFICE, INCL. 50% MEZZ.			3,521
FLAG LOT CREATIVE OFFICE			1,648
INDUSTRIAL ST. RESTAURANT (COUNTED 50%)			1,500
FLAG LOT RESTAURANTS (COUNTED 50%)			1,250
COMMUNITY FLEX SPACE			1,298
ARTS WORKSHOP			500
TOTAL PROVIDED			26,982

Source: Lorcan O'Herlihy Architects, January 8, 2015

PARKER ENVIRONMENTAL CONSULTANTS

Figure II-14
Ground Floor Arts and Productive Uses Plan



Source: Lorcan O' Herlihy Architects, March 31, 2016

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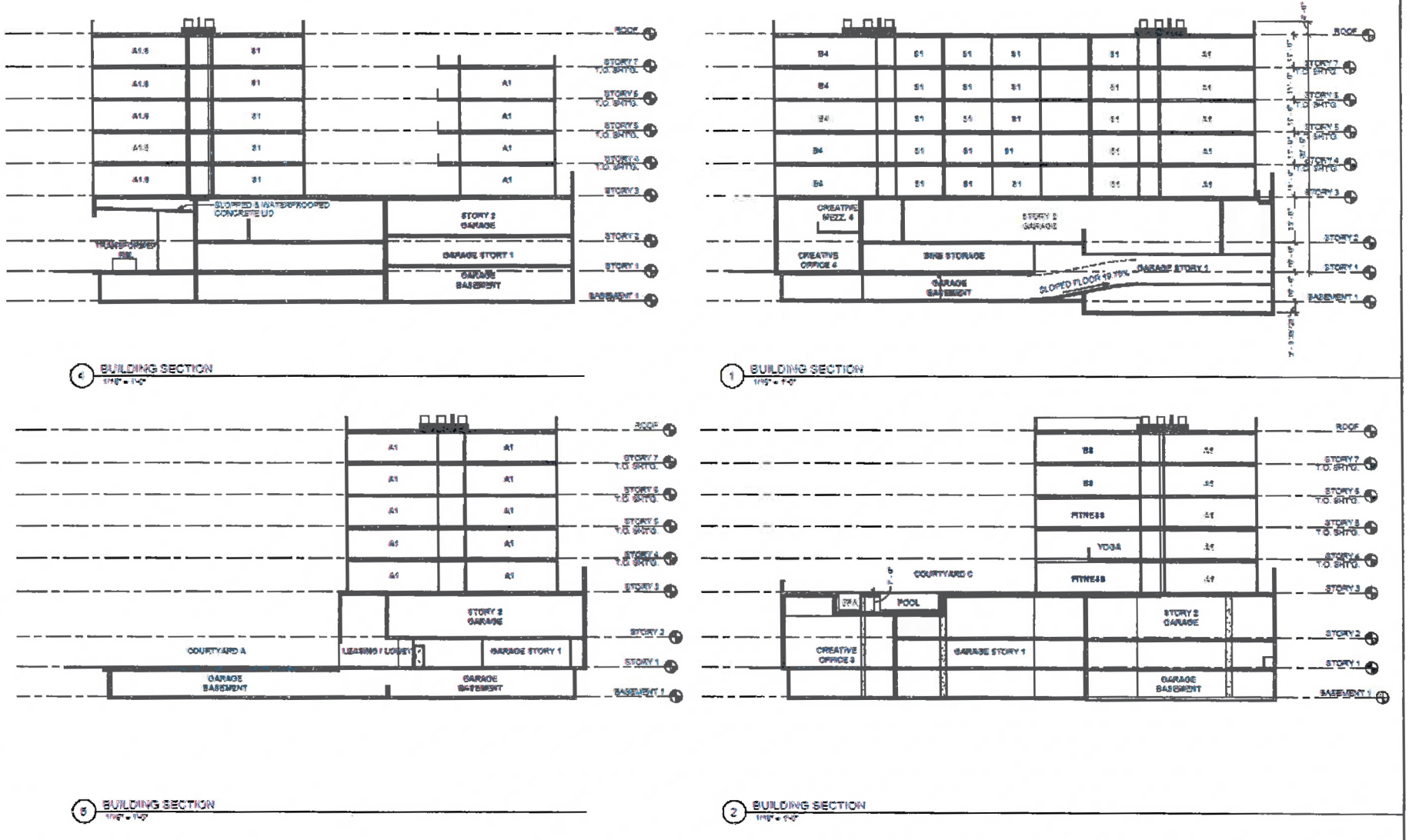
Figure II-15
Building Sections



Source: Lorcan O' Herlihy Architects, March 31, 2016.

PARKER ENVIRONMENTAL CONSULTANTS

Figure II-16
Building Sections

3. ARCHITECTURAL FEATURES

The Industrial Street Lofts Project consists of a seven-story building with five floors of live/work units above two levels of above grade parking and ground floor neighborhood serving restaurant, and creative office space on Proposed Lot 1. Structured parking for the building on Proposed Lot 1 would be concealed from adjacent streets by ground floor uses, with parking provided at grade interior to the building and in two levels above grade and one level of below grade parking.

The proposed structures on Lot 2 would include a two-story creative office (approximately 20 feet in height above grade) and a four-story creative office building with ground floor and second floor restaurant space (approximately 45 feet in height above grade).

Architectural materials would include a mix of aluminum windows, translucent railings, board formed concrete, exterior plaster, metal siding, brick, and glass. The proposed building elevations are shown in Figure II-17, Building Elevations. An illustrative rendering of the Industrial Street Lofts Project is shown in Figure II-18.

4. OPEN SPACE, LANDSCAPING, AND SUSTAINABILITY FEATURES

Open Space

The Industrial Street Lofts Project would provide common open space and landscaping amenities in accordance with the LAMC. As summarized in Table II-3, Summary of Required and Proposed Open Space Areas, below, 35,725 square feet of common open space is required by Code. The Proposed Project would include 34,400 square feet of open space with approximately 26,041 square feet of open space on Lot 1 including 17,069 square feet of open space in three separate courtyards on the ground floor, 6,183 square feet of open space in the upper level terraces, 1,742 square feet of open space in a community fitness gym/yoga studio, and 1,020 square feet of common space in a community clubhouse. In addition, 8,359 square feet of open space is proposed to be publically accessible during daylight hours on the partial flag lot park area on a portion of the flag lot. Recreational amenities would include a swimming pool and barbeque area, a fitness gym/yoga studio, a dog run, and a community clubhouse.

The Proposed Project is seeking a 7% reduction in common open space pursuant to LAMC Section 12.21G.3. With approval of this entitlement request, the Proposed Project's common open space would be consistent with the LAMC. The Proposed Project's landscape palate would feature ornamental plants. Landscape Plans for Lot 1 (ground floor and podium level) and the Flag Lot are depicted in Figures II-19 through II-21, respectively.

Sustainability

The Proposed Project would comply with the 2013 California Green Building Standards, the City of Los Angeles Green Building Code and the sustainability provisions of the HI Zone, including requirements for a green or high albedo roof and that at least ten percent of all parking spaces on-site shall include electric vehicle (EV) charging stations.

Table II-3
Summary of Required and Proposed Open Space Areas

Open Space Requirements	Open Space Requirement	Dwelling Units	Open Space (sf)
S: Live Work Units (One habitable room)	100 sf/unit	150	15,000
A: Live Work Units (Two habitable rooms)	100 sf/unit	140	14,000
B: Live Work Units (Three habitable rooms)	125 sf/unit	53	6,625
Live/Work Units (Two habitable rooms)	100 sf/unit	1	100
Subtotal Total		344	35,725
7% Reduction per LAMC 12.21G.3			2,501
Total Required (with 7% Reduction)			**33,224**
Proposed Open Space	**Open Space (sf)**		
Courtyard A Ground Floor West	4,305		
Courtyard B @ Podium Level	4,393		
Courtyard C @ Podium Level	8,398		
Upper Floor Terraces	6,183		
Fitness/Gym and Yoga	1,742		
Clubhouse	1,020		
Partial Flag Lot Open Space Area	8,359		
Total Open Space Provided	**34,400**		

Source: Lorcan O' Herlihy Architects (LOHA) and TCA Architects, April 26, 2016.

5. PARKING AND ACCESS

Automobile

Parking for the proposed Industrial Street Lofts Project would be provided in three levels: one level at-grade, one level above grade, and one level below grade. Vehicular access to the Project Site would be provided via a driveway entry/exit on Industrial Street for and a driveway on Mill Street. An additional parking entrance off Alameda would be provided on Proposed Parcel 1 (see Figure II-7, Parcel 1 - Ground Floor Plan). The Alameda driveway would be restricted to right-turn in and right-turn out movements. The resident parking area would be gated and secured from the common areas.

As summarized in Table II-4, Summary of Required and Proposed Automobile Parking Spaces, and discussed in further detail below, the Proposed Project would meet and exceed the applicable parking requirements pursuant to the LAMC and SB 1818 Density Bonus law. Pursuant to Option 1 of the City's Density Bonus Ordinance, the Proposed Project would require 403 parking spaces, including 344 live/work parking spaces and 59 commercial parking spaces. The Proposed Project will provide up to 536 parking spaces, of which up to 477 will be allocated for residential use and 59 will be allocated for commercial uses.



Source: Lorcan O' Herlihy Architects, March 31, 2016

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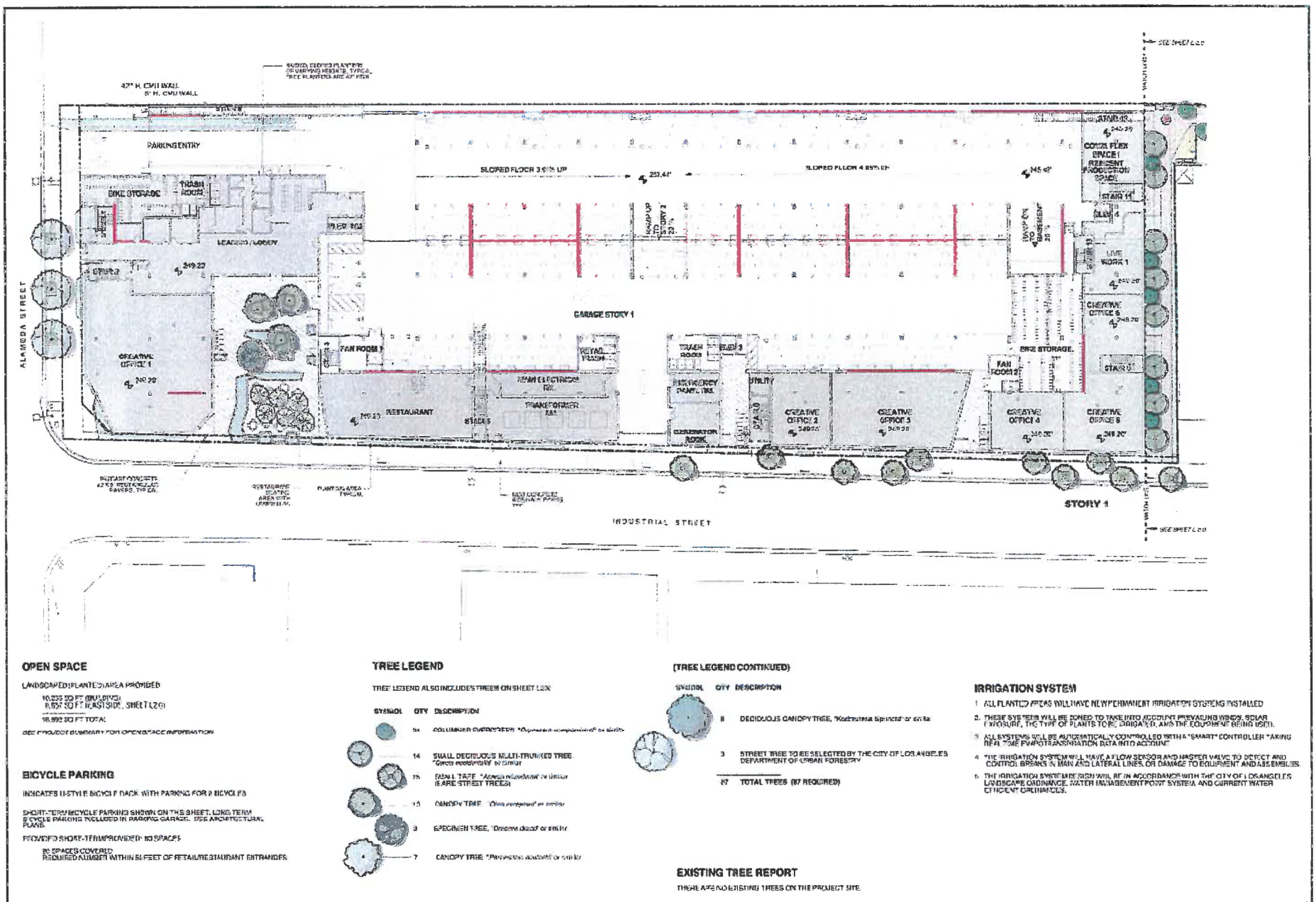
Figure II-17
Building Elevations



Source: Lorcan O' Herlihy Architects, January 8, 2016

PARKER ENVIRONMENTAL CONSULTANTS

Figure II-18
Illustrative Rendering of the Industrial Street Lofts Project



OPEN SPACE

LANDSCAPED PLANTED AREA PROVIDED

10,035 SQ FT (BUILDING)
8,057 SQ FT (EAST SIDE, SHEET L2.0)

18,092 SQ FT TOTAL

SEE PROJECT SUMMARY FOR OPEN SPACE INFORMATION

BICYCLE PARKING

INDICATES U-STYLE BICYCLE RACK WITH PARKING FOR 2 BICYCLES

SHORT-TERM BICYCLE PARKING SHOWN ON THIS SHEET. LONG TERM BICYCLE PARKING INCLUDED IN PARKING GARAGE. SEE ARCHITECTURAL PLANS.

PROVIDED SHORT-TERM PROVIDED: 80 SPACES

80 SPACES COVERED
REQUIRED PLANTED WITHIN 50 FEET OF RETAIL/RESTAURANT ENTRANCES

TREE LEGEND

TREE LEGEND ALSO INCLUDES TREES ON SHEET L2.0

SYMBOL	QTY	DESCRIPTION
	54	COLUMNAR EVERGREEN *Cupressocyparis x leylandii 'Leylandii' or similar*
	14	SMALL DECIDUOUS MULTI-TRUNKED TREE *Cercis occidentalis* or similar
	15	SMALL TREE *Acer palmatum* 'Bloodgood' or similar (6 ARE STREET TREES)
	13	CANOPY TREE *Ulmus parvifolia* or similar
	9	SPECIMEN TREE, *Cinnamomum camphora* or similar
	7	CANOPY TREE *Platanus acerifolia* or similar

(TREE LEGEND CONTINUED)

SYMBOL	QTY	DESCRIPTION
	8	DECIDUOUS CANOPY TREE, *Koelreuteria bipinnata* or similar
	3	STREET TREE TO BE SELECTED BY THE CITY OF LOS ANGELES DEPARTMENT OF URBAN FORESTRY
	87	TOTAL TREES (87 REQUIRED)

EXISTING TREE REPORT

THERE ARE NO EXISTING TREES ON THE PROJECT SITE.

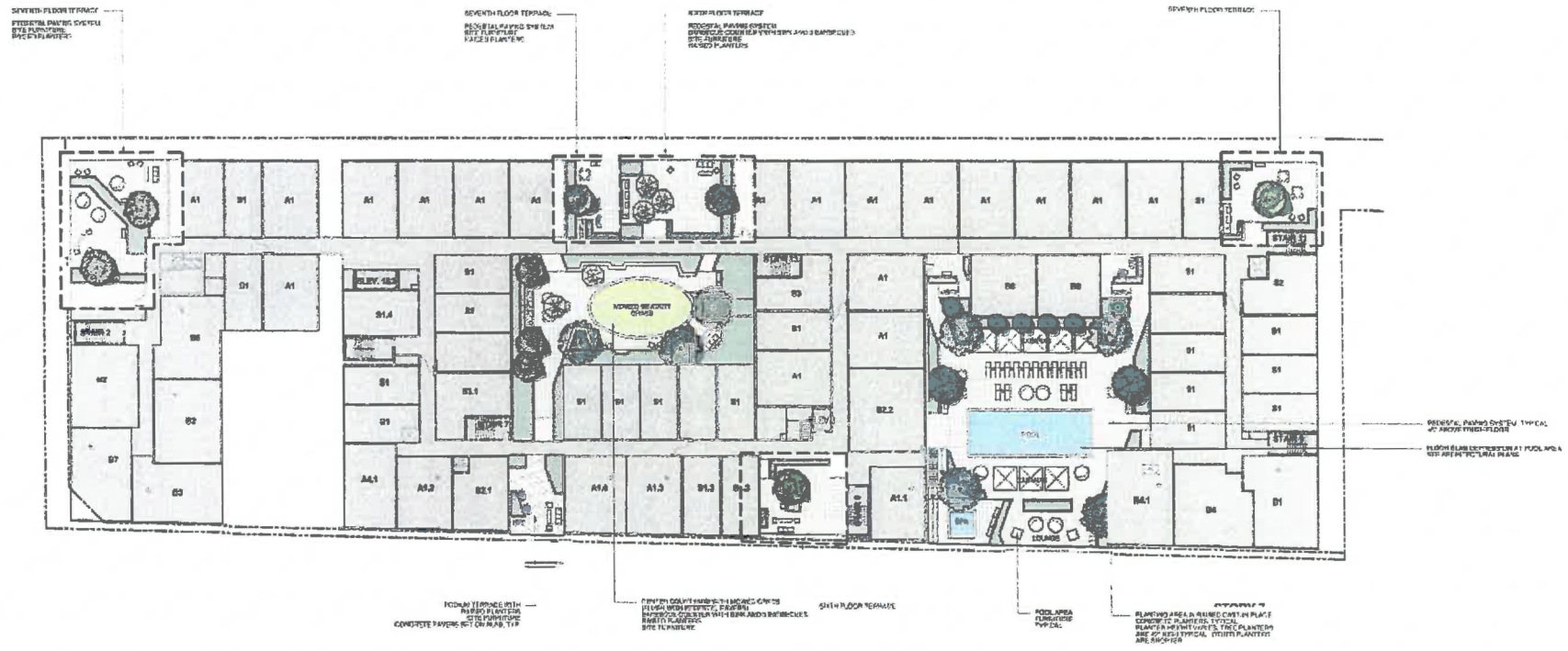
IRRIGATION SYSTEM

1. ALL PLANTED AREAS WILL HAVE NEW PERMANENT IRRIGATION SYSTEMS INSTALLED
2. THESE SYSTEMS WILL BE ZONED TO TAKE INTO ACCOUNT PREVAILING WINDS, SOLAR EXPOSURE, THE TYPE OF PLANTS TO BE WATERED, AND THE EQUIPMENT BEING USED.
3. ALL SYSTEMS WILL BE AUTOMATICALLY CONTROLLED WITH A "SMART" CONTROLLER TAKING REAL TIME EVAPOTRANSPIRATION DATA INTO ACCOUNT.
4. THE IRRIGATION SYSTEM WILL HAVE A FLOW SENSOR AND MASTER VALVE TO DETECT AND CONTROL BREAKS IN MAIN AND LATERAL LINES OR DAMAGE TO EQUIPMENT AND ASSEMBLIES.
5. THE IRRIGATION SYSTEM DESIGN WILL BE IN ACCORDANCE WITH THE CITY OF LOS ANGELES LANDSCAPE ORDINANCE, WATER MANAGEMENT POINT SYSTEM AND CURRENT WATER EFFICIENT ORDINANCES.

Source: Lorcan O' Herlihy Architects, March 31, 2015

PARKER ENVIRONMENTAL CONSULTANTS

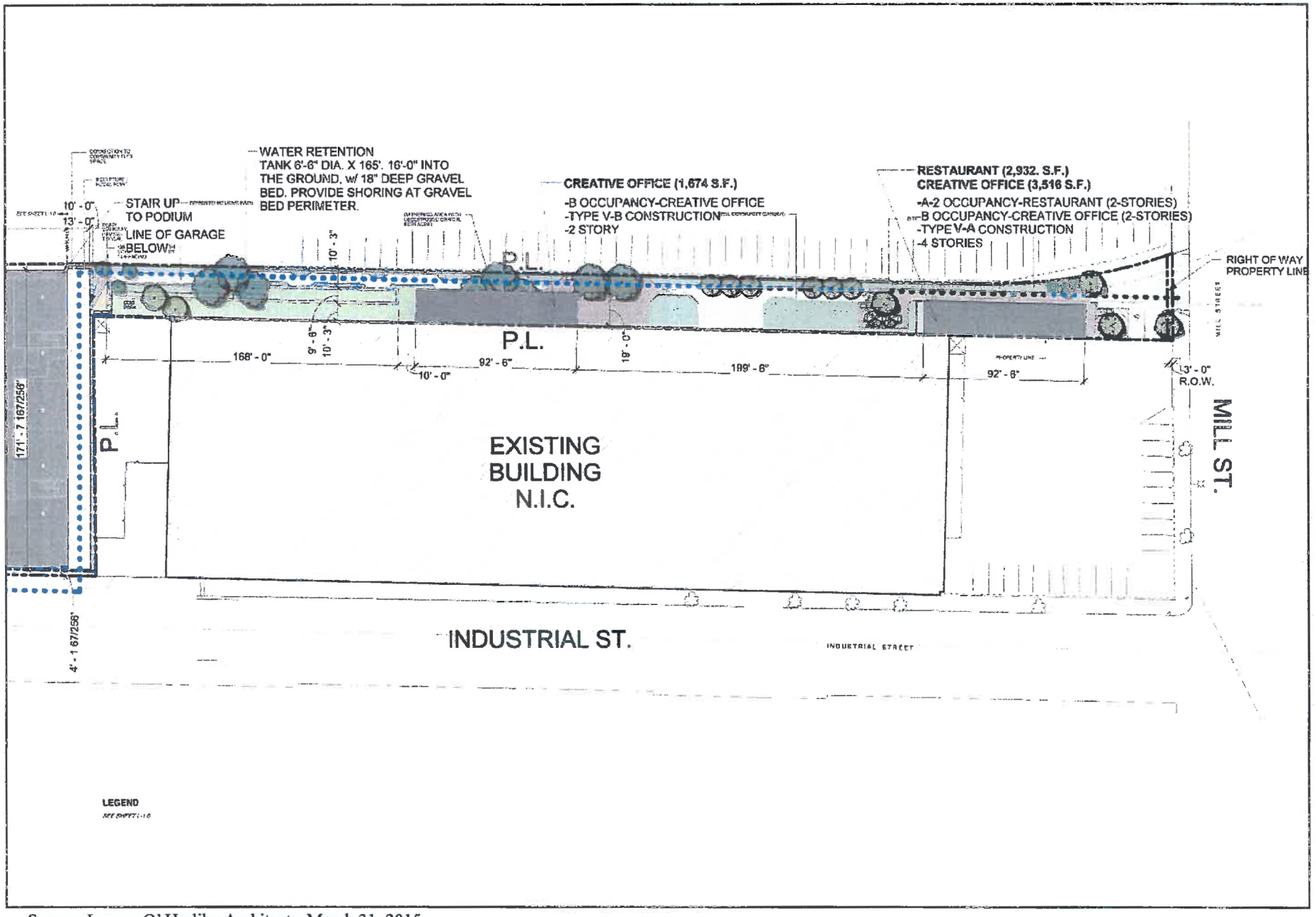
Figure II-19
Conceptual Landscape Plan - Ground Floor



Source: Lorcan O' Herlihy Architects, March 31, 2016

PARKER ENVIRONMENTAL CONSULTANTS

Figure II-20
Conceptual Landscape Plan - Podium Level



Source: Lorcan O' Herlihy Architects, March 31, 2015

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ENVIRONMENTAL CONSULTANTS

Figure II-21
Conceptual Landscape Plan - Parcel 2

Table II-4
Summary of Required and Proposed Automobile Parking Spaces

Description	Quantity (DU)	Parking Required by Code [a]		Parking Provided[b]
		Rate	Spaces	
Residential				
Live/ Work Units (Studio)	150	1.00/du	150	**477**
Live/ Work Units (1-Bedroom)	140	1.00/du	140	
Live/ Work Units (2-Bedroom)	53	2.00/du	106	
Live/Work Unit	1	1.00/du	1	
Total	**344**		**397**	
Commercial				
Creative Office	24,044	2.00/1,000 sf	48	**59**
Restaurant	5,500 sf	2.00/1,000 sf	11	
Subtotal Commercial	27,450	--	**59**	
		TOTAL	**403**	**536**

Notes:
du = dwelling unit, sf = square feet
[a] Parking requirements pursuant to the Density Bonus Ordinance.
[b] Proposed parking is estimated to be between 456 and 536 spaces.
Source: Lorcan O' Herlihy Architects (LOHA) and TCA Architects, April 26, 2016.

Bicycle

The Project would include 394 on-site bicycle parking spaces, which is pursuant to the standards and requirements of the City's Bicycle Ordinance (182386, *effective March 13, 2013*). The proposed live/work units would require 379 bicycle parking spaces, including 35 short-term and 344 long-term spaces. The commercial component would require 14 bicycle parking spaces, including 6 short-term and 8-long term spaces.

6. CONSTRUCTION

For purposes of analyzing impacts associated with construction, the environmental analysis presented in the MND is based on a construction schedule of approximately 28 months. Construction activities associated with the Proposed Project would be undertaken in four main steps: (1) demolition/site clearing; (2) grading and excavation; (3) building construction, and (4) architectural finishing. The building construction phase includes constructing the proposed buildings, connecting utilities to the buildings, installing irrigation for landscaping, applying architectural coatings, paving, and landscaping the Project Site.

The demolition/site clearing phase would include the demolition of all existing on-site structures, totaling approximately 81,194 square feet of floor area, and would involve clearing the site of any trees, shrubs, walls/fences, pavement, and other existing debris. The demolition/site clearing would be completed in approximately three months. The demolition activities would require the use of a variety of construction equipment, including but not limited to the following: concrete/industrial saws; rubber tired dozers; and tractors/loaders/backhoes.

The grading and site preparation phase would extend over an approximate three-month timeframe and would involve the grading of land to ensure the proper base and slope for the building pads and foundations, as well as for the subterranean parking. It is anticipated that approximately 51,044 cubic yards of soil would be exported and/or imported to prepare the development pad. Typical pieces of construction equipment and machinery involved in this phase include but are not limited to the following: a grader; a rubber tired dozer; and tractors/loaders/backhoes.

The building construction phase is expected to occur for approximately 25 months. Upon completion of the structures, architectural coating, finishing, and paving would occur. It is estimated that architectural coatings would occur over the final 2 months of the building construction phase, and paving would occur during the final month of the building construction phase. Typical pieces of construction equipment and machinery involved in this phase include, but are not limited to, a crane, two cement/mortar mixers, one forklift, one generator set, one tractor/loader/backhoe, three welders, one air compressor, one paver, one piece of paving equipment, and a roller.

Construction activities may necessitate temporary lane closures on streets adjacent to the Project Site on an intermittent basis for utility relocations/hook-ups, delivery of materials, and other construction activities as may be required. However, site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on-site to mitigate any temporary impacts to the neighborhood and surrounding traffic. Construction equipment would be staged on-site for the duration of construction activities. If required, traffic lane and right-of-way closures would be properly permitted by the City agencies and would conform to City standards.

All construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 a.m. to 9:00 p.m. Monday through Friday, and between 8:00 a.m. and 6:00 p.m. on any Saturday or national holidays. No construction activities are permitted on Sundays. The proposed Industrial Street Lofts Project would comply with these restrictions.

1. Haul Route

All construction and demolition debris would be recycled to the maximum extent feasible. Demolition debris and soil materials from the site that cannot be recycled or diverted would be hauled to the Sunshine or Chiquita Canyon landfills, which accept construction and demolition debris and inert waste from areas within the City of Los Angeles. The Sunshine Canyon Landfill is approximately 30 miles north of the Project Site (approx. 60 miles round trip). The Chiquita Canyon landfill is approximately 43 miles to the north of the Project Site (approx. 86 miles round trip). For recycling efforts, the Central L.A. Recycling Center and Transfer Station (Browning Ferris Industries) accepts construction waste for recycling and is located approximately 2.3 miles from the Project Site (approx. 4.6 miles round trip).

For purposes of analyzing the construction-related impacts, it is anticipated that the construction debris and soil export would involve a combination of bottom-dump trucks, end dumps, and truck and trailers with an average 15 cubic yard hauling capacity. All truck staging would either occur on-site or at

designated off-site locations and radioed into the site to be filled. The local haul route to and from the 10 Freeway would utilize South Alameda Street which is a two-way north-southbound street designated as an AvenueO. Traveling from the Project Site to the 101 Freeway, the haul route would utilize 6th Street/Whittier Boulevard, which is a two-way east-westbound street, which is designated as an Avenue II. Traveling from the 101 Freeway to the Project Site the haul route would utilize 7th Street, a two-way east-westbound street, which is designated as an Avenue II. The haul route specified above may be modified in compliance with City policies, provided DOT and/or Street Services approves any such modification.

7. DISCRETIONARY ACTIONS

Camden USA, Inc. ("Owner" and "Applicant") is requesting approval of the following discretionary actions:

1. Pursuant to LAMC Section 11.5.6, General Plan Amendment to the Central City North Community Plan to change the Project Site's land use designation from Heavy Industrial[4] to Community Commercial;

2. Pursuant to LAMC Section 12.32, a Vesting Zone Change/Height District Change from M3-1-RIO (Heavy Manufacturing) to C2-2D (Commercial). The D limitation would limit FAR to 3:1;

3. Pursuant to LAMC Section 12.28, a Zoning Administrator's Adjustment for reduced rear yard setback;

4. Pursuant to LAMC Section 12.24.W.1, a Master Conditional Use Permit for the sale of alcohol for on-site consumption in the proposed Industrial Street Lofts Project's restaurants;

5. Pursuant to LAMC Section 12.21.G.3, a 7% reduction in required residential open space;

6. Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map to create airspace and ground lots, and

7. Pursuant to LAMC Section 16.50.C.2, approval of Site Plan review findings for the development of up to 344 residential live/work units.

Pursuant to various Sections of the LAMC, various approvals and permits from the Building and Safety Department (and other municipal agencies) for project construction activities including, but not limited to

---

[4] *The Community Plan Land Use Map identifies the site as Heavy Industrial; however, the City's mapping system (ZIMAS) identifies the site as Heavy Manufacturing.*

the following: demolition, grading, foundation, building and tenant improvements would be requested. Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate in order to execute and implement the proposed Industrial Street Lofts Project. Other responsible governmental agencies may also serve as a responsible agency for certain discretionary approvals associated with the construction process, which include, but are not limited to the South Coast Air Quality Management District (construction-related air quality emissions) and the Regional Water Quality Control Board, Los Angeles Region (construction- related water quality).

II. PROJECT DESCRIPTION
C. RELATED PROJECTS

In accordance with CEQA Guidelines Section 15064(h) this IS/MND includes an evaluation of the Proposed Project's cumulative impacts. The guidance provided under CEQA Guidelines Section 15064 (h) is as follows:

> *"(1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.*
>
> *(2) A lead agency may determine in an initial study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.*
>
> *(3) A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.*
>
> *(4) The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable."*

In light of the guidance summarized above, an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B). The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the both Projects, were identified for evaluation.

The related projects identified are included in Table II-5, Related Projects List, below. A total of 73 related projects were identified within the affected area of both proposed projects. An analysis of the cumulative impacts associated with these related projects and both proposed project is provided under each individual environmental impact category in Section III of this IS/MND. The locations of the related projects are shown in Figure II-22, Related Projects Location Map.

Table II-5
Related Projects List

Project Number	Project Name	Location/Address	Project Description	Number	Units
1	Washington Bl Opportunity MU (Mercy Hsg) 2009-CEN-5050	220 E. Washington Blvd	Residential Units Renovate Residential Units Specialty Retail/Restaurant	230 32 19,000	du du sf
2	Mixed-Use ENV 2005-1049	1101 S. Olive Street (Olive / 11th)	Condominiums Retail	105 4,500	du sf
3	Linda Vista Senior Housing and Medical Office	610 St. Louis Street	Condominiums Medical Offices	100 33,000	du sf
4	Mixed-Use	928 S. Broadway	Apartments Condominiums Retail	670 17 58,800	du du sf
5	Mixed-Use	534 Main Street	Apartments Retail Other Other	160 18,000 3,500 3,500	du sf sf sf
6	9th / Olive Project	840/888 S. Olive Street	Apartments Retail Restaurant	303 9,680 1,500	du sf sf
7	Restaurant and Bar EAF[5]2010-2899; 2011-CEN-5626	220 W. 9th Street	Restaurant/Bar	23,000	sf
8	ISAF	201 S. Broadway	Restaurant, Retail, Office, and Bar	27,675	sf
9	AMP Lofts	695 S. Santa Fe Ave, Los Angeles, CA	Live/Work Units Retail Restaurant	320 15,000 5,000	du sf sf

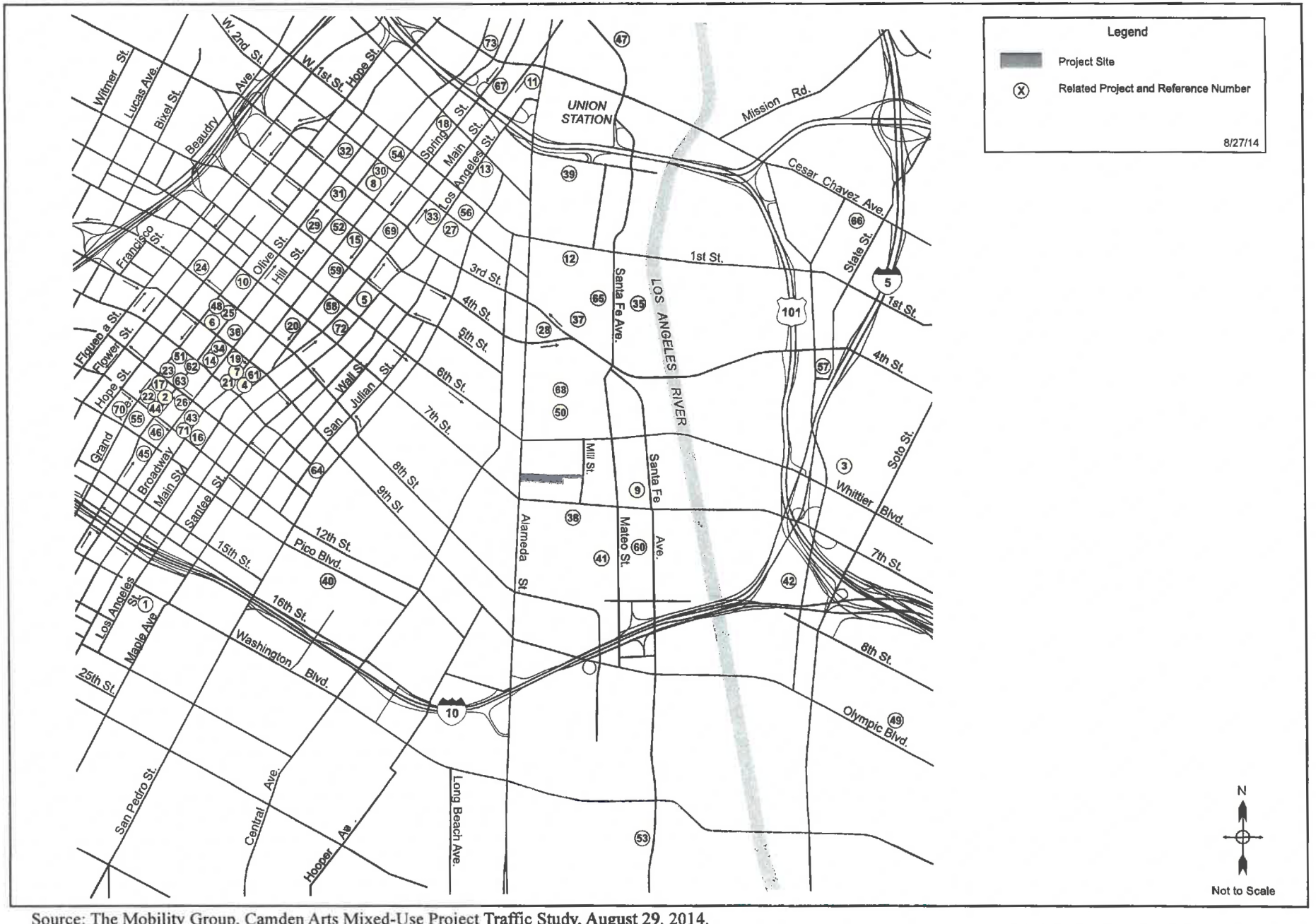
Project Number	Project Name	Location/Address	Project Description	Number	Units
10	8th and Grand Mixed-Use Project 2005-CEN-2528	710 S. Grand Avenue	Condominiums Retail Restaurant	700 27,000 5,000	du sf sf
11	Alameda District Plan (Excluding Development to Date)	Alameda Street and Los Angeles Street	Residential Office Retail Hotel Restaurant Museum	22 7,443,200 645,000 750 20,000 70,000	du sf sf rooms sf sf
12	Mega Toys Residences 2006-CEN-3546	905 E. 2nd Street (West of SCI-Arc at Santa Fe Avenue)	Condominiums Retail	320 18,716	du sf
13	Prop Q and F Public Safety Civic Ctr Facility Plan 2005-CEN-1959	Los Angeles Street and Temple Street	Jail Government Building Parking Structure	179,000 30,000 210	sf sf spaces
14	Olympic/Hill Project	Northwest Corner of Olympic Street and Hill Street	Apartments Retail Restaurant	300 14,500 8,500	du sf sf
15	400 S. Broadway Mixed-Use Project	400-416 Broadway	Apartments Retail	450 7,500	du sf
16	Mixed-Use (Herald Examiner) 2005-CEN-1907; CEN-13-41710	146 W. 11th Street (11th St. / Broadway)	Apartments Office Retail	391 39,720 40,000	du sf sf
17	1001 S. Olive	1001 S. Olive St.	Apartments Restaurant	225 5,000	du sf
18	Hall of Justice 2004-CEN-1011	211 W. Temple Street (Temple St. / Spring St.)	Net Increase In Number of Employees From 1630 to 1660 Parking Structure	30 1,000	employees spaces
19	Hill Mixed	920 S. Hill	Apartments Retail	216 3,900	du sf
20	Mixed-Use Development 2006-CEN-3596	745 S. Spring Street (Spring / 8th St.)	Condominiums Retail	247 10,675	du sf
21	Broadway Mixed	955 S. Broadway	Apartments Retail	201 6,000	du sf
22	Mixed-Use Residential, Retail and Restaurant 2006-CEN-3912	1150 S. Grand Avenue	Condominiums Retail Restaurant	374 9,844 7,600	du sf sf
23	Mixed-Use ENV2008-4679EA, 2008-CEN-4802	1050 S. Grand Avenue (Grand Ave / 11th Street)	Condominiums Retail Restaurant	128 3,472 2,200	du sf sf
24	Mixed-Use Residential, Retail and Restaurant 2007-CEN-3970	609 W. 8th (8th / Grand / Hope Project)	Condominiums Hotel Retail Restaurant	225 200 30,000 32,000	du rooms sf sf
25	801 S. Olive Street Project	801 S. Olive	Apartments Retail Restaurant	363 2,500 7,500	du sf sf
26	Mixed-Use Residential and Retail 2007-CEN-3969	1115 S. Hill Street (Hill / 11th)	Condominiums Retail	172 6,850	du sf
27	Little Tokyo Block 8 Project 2005-CEN-1993	200 S. Los Angeles Street (Los Angeles / 2nd St.)	Condominiums Apartments Retail	510 280 50,000	du du sf
28	Alameda and 4th Project	360 Alameda St.	Apartments Restaurant	350 3,000	du sf

Project Number	Project Name	Location/Address	Project Description	Number	Units
29	Park/Fifth Project 2006-CEN-3234	427 W. 5th Street	Apartments Restaurant	615 16,309	du sf
30	Kawada Tower 2008-CEN-4803	250 S. Hill Street	Condominiums Retail	330 12,000	du sf
31	Bunker Hill Design and Development Program EIR - Parcel Y	Block Bounded by 3rd Street, Olive Street, Hill Street and 4th Street	Office Retail	960,000 100,000	sf sf
32	Grand Avenue Project 2006-CEN-3022	Parcel Q and Parcel W - Bounded by 1st Street, Grand Avenue, Hill Street, and Upper 2nd Street. Parcel L/M-2 - Bounded by GTK Way, Hope Street, and Upper 2nd Street	Condominiums Apartments County Office Building Super Market Restaurant Retail Event Facility Health Club Hotel	1,648 412 681,000 53,000 67,000 225,250 250 50,000 275	du du sf sf sf sf seats sf rooms
33	Condominiums ENV2005-8446, 2006-CEN-3110	221 S. Lost Angeles Street (Los Angeles St. / 2nd St.)	Condominiums Retail	300 3,400	du sf
34	Olive & Olympic	960 S. Olive	Apartments Restaurant	263 14,500	du sf
35	One Santa Fe Project (Mixed-Use) 2006-CEN-2977	300 S. Santa Fe Avenue (2nd St. / Santa Fe Ave.)	Apartments Quality Restaurant Fast-food Restaurant	420 7,500 7,500	du sf sf
36	Mixed Use	820 S. Olive St.	Apartments Retail	589 4,500	du sf
37	Mixed-Use	963 E 4th St.	Office Retail Restaurant	7,860 25,000 20,000	sf sf sf
38	Mixed-Use Project	1800 E. 7th Street	Live/Work Units Retail	110 8,000	du sf
39	Bus Maintenance and Inspection Facility 2005-CEN-2784	454 E. Commercial Street	Bus Maintenance and Inspection Facility	2	acres
40	Stanford Regency Plaza	810 E. Pico Boulevard	Retail	181,620	sf
41	Industrial Park 2007-CEN-4582	1005 S. Mateo Street	Industrial Park	94,849	sf
42	Warehouse, Office, Manufacturing 2007-CEN-4561	1115 Boyle Avenue	Warehouse Office Manufacturing	295,000 77,000 66,000	sf sf sf
43	Mixed Use	1148 S. Broadway	Apartments Retail	94 2,500	du sf
44	DTLA South Park – Site 1	1120 S. Grand Avenue	High-rise Apt Hotel Retail	461 300 8,700	du room sf
45	Condominiums ENV2008-0432EA; 2008-CEN-4671	1340 S. Olive Street	Condominiums	150	du
46	DTLA South Park – Site 4	1230 S. Olive Street	Apartments Retail	362 4,000	du sf
47	MTA Bus Facility 2008-CEN-4450	920 N Vignes Street	Bus Maintenance and Inspection Facility	271 647	buses employees
48	Embassy Tower 2008-CEN-4779	848 S. Grand Avenue	Hi-rise Condominiums Market	420 38,500	du sf
49	Wyvernwood/Boyle Heights Mixed-Use Project - Master	2901 E. Olympic Boulevard	Apartments Residential Condo	331 959	du du

Project Number	Project Name	Location/Address	Project Description	Number	Units
	Plan ENV-2008-2141-EIR Phase -1		/Townhome Office Shopping Center Medical Office	 75 161 25	 sf sf sf
50	Palmetto	1147 Palmetto Street & 527 Colyton Street	Live/Work Units Hotel Retail Restaurant	120 141 10,000 10,000	du room sf sf
51	Restaurant Project	1036 S. Grand Avenue	Restaurant	7,149	sf
52	Clark Hotel	426 S. Hill Street	Hotel	347	rooms
53	Restaurant/Entertainment Facility ENV2008-1103EA; 2008-CEN-4796	2309 S. Santa Fe Avenue	Restaurant	37,320	sf
54	Federal Courthouse	Southwest Corner of 1st Street and Broadway	Courthouse	600,000	sf
55	G12 Project	North of Pico Boulevard between Grand Street and Olive Street	Apartments Retail Restaurant	640 30,000 10,000	du sf sf
56	Los Angeles Street Civic Center Project	150 N. Los Angeles Street	Government Offices Retail Child Care Facility	712,500 35,000 2,500	sf sf sf
57	Renovate California American African Museum 2009-CEN-5089	600 S. State Street	Renovate Existing Museum New Museum Construction	24,000 77,000	sf sf
58	SB OMEGA	601 S. Main Street	Apartments Retail	432 28,400	du sf
59	Spring Street Garage and Apartments	Spring Street South of 5th Street	Apartments	120	du
60	Ford Building	7th and Santa Fe	Office Retail	244,000 15,000	sf sf
61	Sparkle Factory	908 S. Broadway	Office Retail	11,900 11,900	sf sf
62	1000 Grand Project	1000 Grand Avenue	Apartments Restaurant	274 12,000	du sf
63	1027 S. Olive Street	1027 S. Olive Street	Apartments	100	du
64	City Market Project	San Pedro Street Between 9th Street and 12th Street	Education Shopping Center Cinema Apartments Hotel Office	254,500 176,733 744 945 210 294,641	sf sf seats du rooms sf
65	SCI-ARC	970 E. 3rd Street	Live/Work Units Retail School	635 30,062 532	du sf students
66	Medical Office Expansion	1828 E. Cesar Chavez Avenue	Medical Office	49,542	sf
67	LA Plaza Cultura Village	527 N. Spring St.; 555 N. Broadway	Apartments Retail	384 50,000	du sf
68	Barker Block	430 S. Hewitt Street	Condo	72	du
69	Hellman / Banco Building	354 S. Spring Street	Apartments	212	du
70	Apartments	1247 S. Grand Avenue	Apartments	118	du
71	Case Hotel	1106 S. Broadway	Hotel	151	room
72	Mixed-Use Development (Pacific Electric Building)	610 S. Main Street	Restaurants Retail	13,921 726	sf sf

Project Number	Project Name	Location/Address	Project Description	Number	Units
	ENV2005-7019; 2005-CEN-2780				
73	Chinatown Gateway Project 2005-CEN-2348	Cesar Chaves Avenue / Broadway	Apartments Retail	280 22,000	du sf

Notes:
du = dwelling unit, sf = square feet
Source: The Mobility Group, 2014.



Source: The Mobility Group, Camden Arts Mixed-Use Project Traffic Study, August 29, 2014.

PARKER ENVIRONMENTAL CONSULTANTS

Figure II-22
Location of Related Projects

CITY OF LOS ANGELES

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

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY and CHECKLIST

(CEQA Guidelines Section 15063)

LEAD CITY AGENCY: City of Los Angeles	**COUNCIL DISTRICT:** CD 14	**DATE:**
RESPONSIBLE AGENCIES: Department of City Planning		
ENVIRONMENTAL CASE: ENV-2013-2994-MND	**RELATED CASES:** CPC-2013-2993-GPA-VZC-HD-MCUP-ZAA-MSC-SPR, VTT No.74112	
PREVIOUS ACTIONS CASE NO.	☐ DOES have significant changes from previous actions. ☒ DOES NOT have significant changes from previous actions.	

PROJECT DESCRIPTION:

The Project would result in the demolition of the existing industrial building, loading dock, and freight truck/trailer storage area on the Project Site and the construction of an approximately 336,304 square-foot mixed-use project on a 2.59 acre site with 344 live/work units (299,302 square feet of floor area), 7,458 square feet of leasing / amenity area, 24,044 square feet of creative office uses, and 5,500 square feet of restaurant space. All of the live/work units would be classified by the Los Angeles Building Code (LABC) as R2 occupancy in accordance with LABC Section 419, to allow for the creation of arts and crafts or production in the work space and the capacity to accommodate up to 5 employees. The Proposed Project would result in a Floor Area Ratio (FAR) of 2.98:1 and requires a ministerial 22.5% density bonus to increase the maximum density from 282 to 344 units by providing 6% of the base density as Very Low Income units. The Project involves approximately 51,000 cubic yards of earth export for the excavation of one basement level of subterranean parking. The Project site is located in the Methane Buffer Zone and River Improvement Overlay District (RIO) and is bounded by South Alameda Street, an Avenue I to the west; Industrial Street, a Collector Street to the south; Mill Street, a Collector Street to the east; and Wholesale Street, a private street to the north.

The Project's discretionary requests include: (1) a General Plan Amendment to the Central City North Community Plan to change the Project Site's land use designation from Heavy Industrial to Community Commercial; (2) a Vesting Zone Change/Height District Change from M3-1-RIO (Heavy Manufacturing) to C2-2D-RIO (Commercial); (3) a Zoning Administrator's Adjustment for reduced setbacks; (4) a Master Conditional Use Permit for the sale of alcohol for onsite consumption in the proposed restaurants; (5) a Director's Decision for a 7% reduction in required residential open space; (6) a Vesting Tentative Tract Map to create airspace and ground lots, and (7) approval of Site Plan Review findings.

ENVIRONMENTAL SETTING:

The Project Site is located in the downtown Los Angeles, within the boundaries of the Central City North Community Plan. The Project Site includes approximately 114,848 gross square feet of lot area (i.e., 2.64 acres) and is currently improved with an industrial building, remnants of a former railroad spur, loading dock, and freight truck and trailer storage area.

PROJECT LOCATION: 1525 Industrial Street, Los Angeles, CA 90021

COMMUNITY PLAN AREA: Central City North		**AREA PLANNING COMMISSION:**	**CERTIFIED NEIGHBORHOOD COUNCIL:**
STATUS: ☐ Preliminary ☐ Proposed ☒ ADOPTED in 2003	☐ Does Conform to Plan ☒ Does NOT Conform to Plan	Central	Historic Cultural

EXISTING ZONING: M3-1	**MAX DENSITY ZONING:** N/A	**LA River Adjacent:** No
GENERAL PLAN LAND USE: Heavy Manufacturing	**MAX. DENSITY PLAN:** N/A	**PROPOSED PROJECT DENSITY:** 132.8 DU/acre

Determination (To be completed by Lead Agency)

On the basis of this initial evaluation:

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

Signature	Title	Phone
	Planning Assistant	213-978-1345

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 significant.

III. INITIAL STUDY CHECKLIST FORM

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

☐ I find that 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 the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

Signature	**Date**
	7/14/2016

Printed Name

Michael Sin

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

BACKGROUND

PROPONENT NAME	**PHONE NUMBER**
Industrial Street Lofts Project - Camden USA	818-728-6036
PROPONENT ADDRESS	
15303 Ventura Boulevard, Suite 605, Los Angeles, CA 91403	
AGENCY REQUIRING CHECKLIST	**DATE SUBMITTED**
City of Los Angeles Department of City Planning	April 29, 2016
PROPOSAL NAME (If Applicable)	
Industrial Street Lofts	

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

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	**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 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?	☐	☐	☒	☐
2.	**AGRICULTURE AND FORESTRY RESOURCES.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project, and the Forest Legacy Assessment project, and forest carbon measurement mythology 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, 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 the 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))?	☐	☐	☐	☒

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
3.	**AIR QUALITY.** The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:				
a.	Conflict with or obstruct implementation of the SCAQMD or Congestion Management 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 air basin is non-attainment (ozone, carbon monoxide, & PM 10) under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
d.	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e.	Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
4.	**BIOLOGICAL RESOURCES.** Would the project:				
a.	Have a substantial 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 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 the local or regional plans, policies, regulations by the California Department of Fish and Game or U.S. 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?	☐	☐	☐	☒

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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 tree preservation policy or ordinance(e.g., oak trees or California walnut woodlands)?	☐	☐	☐	☒
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?	☐	☐	☐	☒
5.	**CULTURAL RESOURCES:** Would the project:				
a.	Cause a substantial adverse change in significance of a historical resource as defined in *State CEQA Guidelines* §15064.5?	☐	☐	☒	☐
b.	Cause a substantial adverse change in significance of an archaeological resource pursuant to *State CEQA Guidelines* §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 formal cemeteries?	☐	☐	☒	☐
6.	**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? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii.	Strong seismic ground shaking?	☐	☐	☒	☐
iii.	Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv.	Landslides?	☐	☐	☐	☒
b.	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
7.	**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 regulations adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐
8.	**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 §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☒	☐	☐
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the 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?	☐	☐	☐	☒
9.	**HYDROLOGY AND WATER QUALITY.** Would the proposal result in:				
a.	Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b.	Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	☐	☐	☐	☒
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 plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h.	Place within a 100-year flood plain structures which would impede or redirect flood flows?	☐	☐	☐	☒
i.	Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a	☐	☐	☐	☒

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	result of the failure of a levee or dam?				
j.	Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
10.	**LAND USE AND PLANNING.** Would the project:				
a.	Physically divide an established community?	☐	☐	☒	☐
b.	Conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a 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?	☐	☐	☐	☒
11.	**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?	☐	☐	☐	☒
12.	**NOISE.** Would the project:				
a.	Result in 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.	Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c.	Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
d.	Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
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	☐	☐	☐	☒

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	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?	☐	☐	☐	☒
13.	**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?	☐	☐	☐	☒
14.	**PUBLIC SERVICES.**				
a.	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:				
i.	Fire protection?	☐	☒	☐	☐
ii.	Police protection?	☐	☒	☐	☐
iii.	Schools?	☐	☐	☒	☐
iv.	Parks?	☐	☐	☒	☐
v.	Other public facilities?	☐	☐	☒	☐
15.	**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?	☐	☐	☒	☐
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
16.	**TRANSPORTATION AND 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 standard 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 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, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐
17.	**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 stormwater 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?	☐	☒	☐	☐

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e.	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g.	Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐
18.	**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 which 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 cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

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

PREPARED BY	TITLE	TELEPHONE	DATE
Michael Sin	Planning Assistant	213-978-1345	7/14/2016

IV. ENVIRONMENTAL IMPACT ANALYSIS

INTRODUCTION

This section of the Initial Study contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines, (C.C.R. Title 14, Chapter 3, 15000-15387). The analytical methodology and thresholds of significance are based on the *L.A. CEQA Thresholds Guide.*

1. AESTHETICS

Senate Bill 743

In 2013, the State of California enacted Senate Bill 743 (SB 743). Among other things, SB 743 adds Public Resources Code Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Public Resources Code Section 21099 defines a "transit priority area" as an area within one-half mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." Public Resources Code Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Public Resources Code Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact threshold in the L.A. CEQA Thresholds Guide.

The Proposed Project is a mixed-use live/work infill development with 344 live-work units and 29,544 square feet of commercial uses including 24,044 square feet of creative office and 5,500 square feet of restaurant floor area. The Project Site is located less than one-half mile from the intersection of two major bus lines, 18 and 720 Metro, with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. Therefore, the Proposed Project is located in a transit priority area as defined in Public Resources Code Section 21099. Further, the Project Site is located in an urban area on a lot previously developed with a cold storage facility with loading dock and freight truck and trailer storage areas. Therefore, the Proposed Project's aesthetic and parking impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099.

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

Less Than Significant Impact. As stated above, Senate Bill (SB) 743 was signed into law by Governor Brown in September 2013, which made several changes to CEQA for projects located in areas served by transit. Among other changes, SB 743 eliminates the need to evaluate aesthetic and parking impacts of a project in some circumstances. Specifically, aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered to have a significant impact on the environment.

SB 743 defines a transit priority area as an area within one-half mile of a major transit stop that is existing or planned. A major transit stop is a site containing a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the A.M. and P.M. peak commute periods. An infill site refers to a lot located within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses. However, the exemption for aesthetic impacts does not include impacts to historic or cultural resources, per Section 21099 of the Public Resources Code (PRC).

The proposed project is a mixed-use live/work infill development with 344 live-work units and 29,544 square feet of commercial uses including 24,044 square feet of creative office and 5,500 square feet of restaurant floor area. The project site is located less than one-half mile from the intersection of two major bus lines, 18 and 720 Metro, with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods and is identified as located within a transit priority area (City of Los Angeles Transit Priority Area Map, 2016). Furthermore, the project site does not contain any historic or cultural resources, as discussed in Section V. Cultural Resources of this Initial Study. The project site is not located within an overlay area (e.g., Specific Plan, Community Design Overlay, or Historic Preservation Overlay Zone) or subject to land use regulations that expressly regulates a project's aesthetic impacts (e.g., shade and shadow). As such, the proposed project meets all criteria specified in Section 21099 of the PRC. Therefore, the project's impact on visual resources, aesthetic character, shade and shadow, light and glare, scenic vistas, State Scenic Highways, and parking are considered less than significant per SB 743.

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

No Impact. Refer to Response to Checklist Question I (a) above.

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. Refer to Response to Checklist Question I (a) above.

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

Less Than Significant Impact. Refer to Response to Checklist Question I (a) above.

Cumulative Impacts

Less Than Significant Impact. Refer to Response to Checklist Question I (a) above.

2. AGRICULTURE AND FORESTRY RESOURCES

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

No Impact. According to the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The Project Site is currently occupied by an industrial building, loading dock, and freight truck and trailer storage area. No farmland or agricultural activity exists on or in the vicinity of the Project Site. According to the Soil Candidate Listing for Prime Farmland of Statewide Importance, Los Angeles County, which was prepared by the U.S. Department of Agriculture Natural Resources Conservation Service (NRCS), the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. In addition, the Project Site has not been mapped pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland" in California. The Project Site is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.[1] Therefore, the Proposed Project would have no impact on the conversion of farmland to non-agricultural uses.

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

No Impact. According to the *L.A. CEQA Thresholds Guide,* a significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to non-agricultural use. The Williamson Act of 1965 allows local governments to enter into contract agreements with local landowners with the purpose of trying to limit specific parcels of land to

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1 *State of California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2010, Map, website: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf, accessed September, 2014.*

agricultural or other related open space use.[2] The Project Site does not contain any State-designated agricultural lands or open space. Thus, the Project Site is not subject to a Williamson Act Contract.[3]

The Project Site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the LAMC. The Project Site is currently zoned M3-1 and has a land use designation of Heavy Manufacturing in the Central City North Community Plan. The Project Site is not zoned for agricultural production, and there is no farmland at the Project Site. In addition, no Williamson Act Contracts are in effect for the Project Site.

Therefore, no impact with respect to land zoned for agricultural use or under a Williamson Act Contract will occur.

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

No Impact. The Project Site is zoned M3-1 and has a land use designation of Heavy Manufacturing in the Central City North Community Plan. Neither the Project Site nor the surrounding parcels are zoned for forest land or timberland, and there is no Timberland Production at the Project Site. Therefore, no impact related to loss or conversion of forest land or timberland would occur.

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

No Impact. The Project Site is developed and occupied by an industrial building, loading dock, and freight truck and trailer storage area, completely surrounded by urban uses and infrastructure. No forested lands or significant natural vegetation exist on or in the vicinity of the Project Site. No impact related to the loss of forest land or conversion of forest land would occur.

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

No Impact. According to the *L.A. CEQA Thresholds Guide,* a significant impact may occur if a project results in the conversion of farmland to another non-agricultural use. Neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses and, as discussed above (Section B.2(a)), the Project Site is not classified in any "Farmland" category designated by the State of California. According to the City General Plan Conservation Element (Exhibit B), the Project Site is not located near or in any significant farmland area (i.e., a significant commercial crop or animal producing site). No impacts

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[2] *State of California Department of Conservation, Williamson Act Program, website: http://www.conservation.ca.gov/dlrp/lca/Pages/index.aspx, October, 2014.*

[3] *Williamson Act Program, California Division of Land Resource Protection, website ftp://ftp.consrv.ca.gov/pub/dlrp/wa/2012%20Statewide%20Map/WA_2012.pdf, accessed April 2014.*

related to the conversion of farmland to a non-agricultural use, or conversion of forest land to a non-forest use would occur as a result of the Proposed Project.

Cumulative Impacts

No Impact. Development of the Proposed Project in conjunction with the related projects would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. Collectively, the projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of forested land or conversion of forested land to non-forest use. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Sites and the related projects' sites are not included in the Important Farmland category.[4] The Project Site and related projects' sites are located in an urbanized area in the City and do not include any State-designated agricultural lands or forest uses. Therefore, there would be no cumulative agricultural impacts.

3. AIR QUALITY

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

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant air quality impact may occur if the Proposed Project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. In the case of projects proposed within the City of Los Angeles or elsewhere in the South Coast Air Basin (Basin), the applicable plan is the Air Quality Management Plan (AQMP), which is prepared by the South Coast Air Quality Management District (SCAQMD), which is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and cooperates actively with all state and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures through educational programs or fines, when necessary.

The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a series of AQMPs. The most recent AQMP was adopted by the Governing Board of the SCAQMD on December 7, 2012. The 2012 AQMP was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and state air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. It builds on the approaches taken from the 2007 AQMP for the attainment of the federal ozone air quality standard.

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[4] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program.*

These planning efforts have substantially decreased the population's exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin.

Projects that are consistent with the projections of employment and population forecasts identified in the Growth Management Chapter of the Regional Comprehensive Plan (RCP) are considered consistent with the AQMP growth projections, since the Growth Management Chapter forms the basis of the land use and transportation control portions of the AQMP.

The proposed live/work and commercial uses will neither conflict with the SCAQMD's 2012 Air Quality Management Plan nor obstruct implementation of the region's plan to attain air quality standards. While the Proposed Project will increase population in the City of Los Angeles, it is consistent with the City of Los Angeles' General Plan, as well as population growth projections used by SCAG in the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy to identify future air quality emissions that must be mitigated through the 2012 AQMP.[5] As discussed in Question 13(a) under Population and Housing, the Project is consistent with the regional growth projections for the Los Angeles Subregion. In addition, as discussed in Question 3(b) below, the Project would not have the potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Moreover, the Proposed Project is an infill development that helps to ensure that the live/work uses associated with this project have less impact on air quality emissions than a project located in areas with less commercial density and/or transportation infrastructure. Further, the ground-floor commercial uses in this infill development would likely attract a higher-than-average share of local residents and employees from local businesses that will drive less than those living in suburban, less dense environments. In the case of this project, the commercial square footage would consist of creative office space and restaurant uses. The mixed-use nature of the Project would further reduce dependence upon the automobile as residents would have the opportunity to work and live in the same building. Thus, the Proposed Project would not impair implementation of the AQMP, and this impact would be less than significant.

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a project may have a significant impact where project-related emissions would exceed federal, state, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. The City of Los Angeles defers to the SCAQMD's thresholds of significance for determining project impacts upon air quality.

Construction Emissions

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 28 months which would be undertaken in four main steps: (1) demolition/site clearing; (2) grading and excavation; (3) building construction; and (4) architectural coatings. The building

[5] *See Checklist Question 10, Population and Housing.*

construction phase includes the construction of the proposed buildings, connection of utilities to the buildings, laying irrigation for landscaping, architectural coatings, paving, and landscaping the Project Site.

These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants. Earthwork activities involving grading and site preparation would primarily generate $PM_{2.5}$ and PM_{10} emissions. Mobile sources (such as diesel-fueled equipment on-site and traveling to and from the Project Site) would primarily generate NO_x emissions. The application of architectural coatings would primarily result in the release of reactive organic gases (ROG) emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

The analysis of daily construction emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod) recommended by the SCAQMD. Due to the construction time frame and the normal day-to-day variability in construction activities, it is difficult, if not impossible, to precisely quantify the daily emissions associated with each phase of the proposed construction activities. Nonetheless, Table IV-1, Estimated Peak Daily Construction Emissions, identifies daily emissions that are estimated to occur on peak construction days for each construction phase. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas (See Regulatory Compliance Measure RCM 3-1, below.). As shown in Table IV-1, construction-related daily emissions associated with the Proposed Project would not exceed any regional SCAQMD significance thresholds for criteria pollutants during the construction phases.

Additionally, the potential exists for volatile organic compounds to be found during excavation of the subterranean garage during soil disturbance activities. If contaminated soil is found to be present during the earthwork activities, the applicant would be subject to SCAQMD Rule 1166 which sets specific requirements to control the emission of VOC from excavating, grading, handling and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition. Further, due to the age of the building being demolished, potential contact with asbestos or lead based paint may also occur during the demolition activities. Compliance with Regulatory Compliance Measures RCM 3-2 and RCM 3-3, which address compliance with SCAQMD Rule 1166 and Rule 1403, respectively, would ensure air quality impacts from VOCs, and asbestos containing materials are reduced to less than significant levels. Therefore, construction impacts would be less than significant with the implementation of the mandatory measures set forth in Regulatory Compliance Measures RCM 3-1, RCM 3-2, and RCM 3-3, below.

Table IV-1
Estimated Peak Daily Construction Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Demolition/Site Clearing Phase						
Fugitive Dust	--	--	--	--	1.20	0.18
Off-Road Diesel Equipment	4.29	45.66	35.03	0.04	2.29	2.14
On-Road Diesel (Hauling)	0.22	3.57	2.84	<1	0.27	0.11
Worker Trips	0.07	0.09	0.97	<1	0.17	0.05
Total Emissions	***4.58***	***9.32***	***38.84***	***0.04***	***3.93***	***2.48***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Grading & Site Preparation Phase						
Fugitive Dust	--	--	--	--	2.76	1.50
Off-Road Diesel Equipment	3.67	38.45	26.08	0.03	2.20	2.02
On-Road Diesel (Hauling)	1.80	28.05	22.29	0.07	2.09	0.83
Worker Trips	0.07	0.09	<1	<1	0.17	0.05
Total Emissions	***4.54***	***66.59***	***48.37***	***0.10***	***7.22***	***4.40***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Building Construction Phase						
Building Construction On-Site	3.4	28.5	18.50	0.03	1.97	1.85
Building Construction Off-Site	3.39	14.35	46.73	0.09	6.33	1.84
Total Emissions	***46.79***	***42.20***	***15.23***	***0.12***	***8.30***	***3.69***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Architectural Coatings						
Architectural Coating On-Site	57.01	2.19	1.87	<1	0.17	0.17
Architectural Coatings Off-Site	0.39	0.53	5.58	0.01	1.07	0.29
Total Emissions	***57.40***	***2.72***	***7.45***	***0.01***	***1.24***	***0.46***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust.
Calculation sheets are provided in the Air Quality Modeling Worksheets.

Operational Emissions

Air pollutant emissions are currently generated at the Project Site by an existing ice generation and food storage facility. This use generates air pollutant emissions from stationary sources, such as space and water heating, architectural coatings (paint), and mobile vehicle traffic traveling to and from the Project Site. The average daily emissions generated by the existing uses at the Project Site have been estimated utilizing the California Emissions Estimator Model (CalEEMod) Version 2013.2.2 recommended by the SCAQMD. As shown in Table IV-2, motor vehicles are the primary source of air pollutant emissions associated with existing uses at the Project Site.

Table IV-2
Existing Daily Operational Emissions from the Project Site

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Natural Gas Usage	0.00	<1	<1	0.00	0.00	0.00
Architectural Coating	1	-	-	-	-	-
Consumer Products	2	-	-	-	-	-
Motor Vehicles	2	4	16	<1	3	<1
Total Emissions	***4***	***4***	***16***	***<1***	***3***	***<1***
Wintertime (Non-Smog Season) Emissions						
Natural Gas Usage	0.00	<1	<1	0.00	0.00	0.00
Architectural Coating	0.52	-	-	-	-	-
Consumer Products	2	-	-	-	-	-
Motor Vehicles	2	4	16	<1	3	<1
Total Emissions	***4***	***4***	***16***	***<1***	***3***	***<1***
Calculation data are provided in Air Quality Modeling Worksheets.						

Similar to existing conditions, operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities of the Proposed Project. Area source emissions would be generated by the consumption of natural gas and landscape maintenance. Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site. The analysis of daily operational emissions associated with the Proposed Project has been prepared utilizing CalEEMod recommended by the SCAQMD. The results of these calculations are presented in Tables IV-3, Estimated Daily Operational Emissions. As shown, the operational emissions generated by the Proposed Project would not exceed the regional thresholds of significance set by the SCAQMD. Therefore, impacts associated with regional operational emissions from the Proposed Project would be less than significant.

Table IV-3
Estimated Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Project Emissions						
Mobile (Vehicle) Sources	11.69	28.81	116.27	0.26	17.96	5.06
Energy (Natural Gas)	0.09	0.82	0.48	<1	0.06	0.06
Architectural Coatings	4.2	0	0	0	0	0
Consumer Products	17.67	0	0	0	0	0
Landscape Maintenance Equipment	0.95	0.34	29.13	<1	0.15	0.15
Total Project Emissions	***34.6***	***29.97***	***145.78***	***0.26***	***18.17***	***5.27***
Less Existing Project Site Emissions	*4*	*4*	*16*	<1	*3*	<1
Total Net Project Emissions	***30.6***	***25.97***	***129.78***	***0.26***	***15.17***	***5.27***
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No
Wintertime (Non-Smog Season) Emissions						
Project Emissions						
Mobile (Vehicle) Sources	11.08	27.39	113.83	0.27	17.96	5.06
Energy (Natural Gas)	0.09	0.82	0.49	<1	0.07	0.07
Architectural Coatings	4.22	0	0	0	0	0
Consumer Products	0	0	0	0	0	0
Landscape Maintenance Equipment	0.95	0.34	***29.13***	<1	0.15	0.15
Total Project Emissions	***16.34***	***28.55***	***143.45***	***0.27***	***18.18***	***5.28***
Less Existing Project Site Emissions	*4*	*4*	*16*	<1	*3*	<1
Total Net Project Emissions	***12.34***	***24.55***	***127.45***	***0.27***	***15.18***	***5.28***
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No
Calculation sheets are provided in Air Quality Modeling Worksheets.						

Regulatory Compliance Measures

The following Regulatory Compliance Measures are required in conjunction with the Proposed Project.

RCM 3-1 Air Pollution (Demolition, Grading, and Construction Activities)

- All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
- The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.

- All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 25 mph per District Rule 403), so as to prevent excessive amounts of dust.

- All dirt/soil loads shall be secured by trimming, watering, or other appropriate means to prevent spillage and dust.
- All haul trucks transporting dirt/soil materials off-site shall be either securely covered or shall maintain at least 6 inches of freeboard per District Rule 403.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
- During construction, trucks and vehicles in loading and unloading queues will have their engines turned off after 5 minutes when not in use to reduce vehicle emissions.

Regulatory Compliance Measure RCM 3-2: The Project shall comply with South Coast Air Quality Management District Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, which sets requirements to control the emission of VOC from excavating, grading, handling and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.

Regulatory Compliance Measure RCM 3-3: The Project shall comply with South Coast Air Quality Management District Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities, which specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM).

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

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project adds a considerable cumulative contribution to federal or state non-attainment pollutants. As the Basin is currently in state non-attainment for ozone, NO_2, PM_{10} and $PM_{2.5}$, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. In regards to determining the significance of the Proposed Project contribution, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

As discussed under Question 3(b) above, the Proposed Project would not generate construction or operational emissions that exceed the SCAQMD's recommended regional thresholds of significance.

Therefore, the Proposed Project would not generate a cumulatively considerable increase in emissions of the pollutants for which the Basin is in nonattainment, and impacts would be less than significant.

d) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities; rehabilitation centers; convalescent centers; retirement homes; residences; schools; playgrounds; child care centers; and athletic facilities.[6]

The SCAQMD has developed localized significance thresholds (LSTs) that are based on the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD,[7] apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO_x; CO; PM_{10}; and $PM_{2.5}$. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or States ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each SRA. For PM_{10}, the LSTs were derived based on requirements in SCAQMD Rule 403 — Fugitive Dust. For $PM_{2.5}$, the LSTs were derived based on a general ratio of $PM_{2.5}$ to PM_{10} for both fugitive dust and combustion emissions.

LSTs are provided for each of SCAQMD's 38 source receptor areas (SRA) at various distances from the source of emissions. The Project Site is located within SRA 1, which covers the Central Los Angeles area. The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Proposed Project include residential uses and an educational facility (Para Los Ninos). Given the proximity of these sensitive receptors to the Project Site, the LSTs with receptors located within 25 meters (82.02 feet) are conservatively used to address the potential localized air quality impacts associated with the construction-related NO_X, CO, PM_{10}, and $PM_{2.5}$ emissions for each construction phase.

Localized Construction Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. However, as shown in Table IV-4 below, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for a 2.64-acre

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6 *South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, page 5-1.*

7 *South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.*

site in SRA 1.[8] Therefore, localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant.

Table IV-4
Localized On-Site Peak Daily Construction Emissions

Construction Phase [a]	Total On-site Emissions (Pounds per Day)			
	NO_x [b]	CO	PM_{10}	$PM_{2.5}$
Demolition/Site Clearing Emissions	45.66	35.03	3.49	2.31
Grading, Excavation & Site Preparation Emissions	38.45	26.07	4.97	3.52
Building Construction Emissions	28.50	18.50	1.96	1.85
Architectural Coatings Emissions	2.18	1.86	0.17	0.17
Maximum Emissions	***45.66***	***35.03***	***4.97***	***3.52***
SCAQMD Localized Thresholds	***63***	***1,189***	***10***	***5***
Potentially Significant Impact?	**No**	**No**	**No**	**No**

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust.

The localized thresholds for all phases are based on a receptor distance of 82 feet in SCAQMD's SRA 1. Thresholds were calculated based on the SCAQMD's linear regression methodology for a 2.64-acre site in SRA 1.

The localized thresholds listed for NO_x in this table takes into consideration the gradual conversion of NO_x to NO_2, and are provided in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD. As discussed previously, the analysis of localized air quality impacts associated with NO_x emissions is focused on NO_2 levels as they are associated with adverse health effects.

Source: Parker Environmental Consultants, 2015. Calculation sheets are provided in Air Quality Modeling Worksheets.

Localized Operational Emissions

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The SCAQMD suggests conducting a CO hotspots analysis for any intersection where a project would worsen the Level of Service (LOS) to any level below C, and for any intersection rated D or worse where the project would increase the V/C ratio by two percent or more. Based on a review of the Project's Traffic Study, the Proposed Project would not meet these criteria for any of the studied intersections. As such, the Proposed Project would not have the potential to cause or contribute to an exceedance of the California one-hour or eight-hour CO standards of 20 or 9.0 ppm, respectively; or generate an incremental increase equal to or greater than 1.0 ppm for the California one-hour CO standard, or 0.45 ppm for the eight-hour CO standard at any local intersection.

As shown in Table IV-5, below, peak daily emissions generated within the Project Site during operation would not exceed the applicable operational localized significance thresholds for an approximate 2-acre site in SRA 1. Therefore, impacts with respect to localized CO concentrations and localized operational emissions would be less than significant.

[8] *The Project Site acreage is based on information from the City of Los Angeles Zoning Information and Map Access System (ZIMAS), accessed June 18, 2013.*

Table IV-5
Proposed Project Estimated Daily Localized Operational Emissions

Emissions Source	Emissions in Pounds per Day[a]			
	NO_x[b]	CO	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions				
Area Source	0.34	28.93	0.15	0.15
Energy (Natural Gas)	0.56	0.27	0.04	0.04
Total Project Emissions	***0.90***	***29.2***	***0.19***	***0.19***
SCAQMD Localized Thresholds[c]	**108**	**1,048**	**2**	**2**
Potentially Significant Impact?	**No**	**No**	**No**	**No**
Wintertime (Non-Smog Season) Emissions				
Area Source	0.34	28.93	0.15	0.15
Energy (Natural Gas)	0.56	0.27	0.04	0.04
Total Project Emissions	***0.90***	***29.2***	***0.19***	***0.19***
SCAQMD Localized Thresholds	**108**	**1,048**	**2**	**2**
Potentially Significant Impact?	**No**	**No**	**No**	**No**

Note: Calculation worksheets are provided in Appendix A to this IS/MND.

[a] *For a conservative estimate, the localized thresholds for all phases are based on a receptor distance of 82 feet in SCAQMD's SRA 1 for a 2-acre site.*

[b] *The localized thresholds listed for NO_x takes into consideration the gradual conversion of NO_x to NO_2, and are provided in the mass rate look-up tables in the SCAQMD's "Final Localized Significance Threshold Methodology" guidance document. The analysis of localized air quality impacts associated with NO_x emissions is focused on NO_2 levels as they are associated with adverse health effects.*

[c] *Thresholds for each pollutant is taken from Appendix C of the Final LST Methodology Document, revised October 21, 2009.*

Source: Parker Environmental Consultants, 2016.

Toxic Air Contaminants (TAC)

As for exposure of sensitive receptors to toxic air contaminants, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.[9] The Proposed Project is not anticipated to generate a substantial number of daily truck trips. Based on the limited activity of TAC sources, the Proposed Project would not warrant the need for a health risk assessment associated with on-site activities, and potential TAC impacts from diesel particulate emissions are expected to be less than significant.

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes and automotive repair facilities. As the Proposed Project consists of a mixed-use development of live/work units, retail/creative office space, and restaurant, the Proposed Project would not include any land uses that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants and no toxic airborne emissions would typically result from Proposed Project implementation. In addition,

[9] *SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.*

construction activities associated with the Proposed Project would be typical of other development projects in the City, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, state, and federal level that would protect sensitive receptors from substantial concentrations of these emissions.

e) Would the project create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. A significant impact may occur if objectionable odors occur that would adversely impact sensitive receptors. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. As the Proposed Project involves no elements related to these types of activities, no odors from these types of uses are anticipated. Good housekeeping practices would be sufficient to prevent nuisance odors. In addition, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Proposed Project's long-term operations phase. Therefore, potential operational odor impacts would be less than significant.

During the construction phase, activities associated with the application of architectural coatings and other interior and exterior finishes may produce discernible odors typical of most construction sites. Such odors could be a temporary source of nuisance to adjacent uses. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD Rules, no construction activities or materials that would create a significant level of objectionable odors are proposed. Therefore, impacts associated with objectionable odors would be less than significant.

Cumulative Impacts

Less than Significant Impact. Development of the Proposed Project in conjunction with the related projects would result in an increase in construction and operational emissions in an already highly urbanized area of the City of Los Angeles. However, as set forth below, cumulative air quality impacts would be less than significant.

AQMP Consistency

Cumulative development can affect implementation of the 2012 AQMP. The 2012 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the 2012 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2012 AQMP will not be obstructed by such growth and cumulative impacts would be less than significant. Since the Proposed Project and the related projects would be consistent with SCAG's growth projections, they would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the

implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the 2012 AQMP would be less than significant.

Construction and Operational Emissions

Cumulative air quality impacts from construction and operation of the Proposed Project would be based on SCAQMD guidelines which recommend that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Thus, as discussed in Question 3(c) above, because the construction-related and operational daily emissions associated with the Proposed Project would not exceed the SCAQMD's recommended thresholds, the Proposed Project's emissions would not be cumulatively considerable. Therefore, cumulative air quality impacts would be less than significant.

Odor Impacts

With respect to cumulative odor impacts, potential sources that may emit odors during construction activities at the Proposed Project and each related project include the use of architectural coatings, solvents, and asphalt paving. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Moreover, none of the related projects are located in close enough proximity to the Proposed Project as to cause cumulative odor impacts. Furthermore, based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Proposed Project would not combine with other projects to create objectionable construction odors. With respect to operations, SCAQMD Rule 402 (Nuisance) and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts from the related projects and the Proposed Project's long-term operations phase. Thus, cumulative odor impacts would be less than significant.

4. BIOLOGICAL RESOURCES

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

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species behaviors are disturbed (e.g.,

from the introduction of noise or light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The Project Site does not contain any critical habitat or support any species identified or designated 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. The Project Site is located in an urbanized area of the City. The Project Site is improved with an industrial building, loading dock, and freight truck and trailer storage area. Therefore, implementation of the Proposed Project would not result in any adverse impacts with respect to habitat modification, and no impact would occur.

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

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; (c) the alternation of an existing wetland habitat; or (d) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise or light) to a degree that may diminish the chances for long-term survival of a sensitive species. The Project Site is occupied by an industrial building, loading dock, and freight truck and trailer storage area. No riparian or other sensitive natural communities are located on or adjacent to the Project Site. Therefore, implementation of the Proposed Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities and no impact would occur.

c) Would the project 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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat, as defined by Section 404 of the Clean Water Act. The Project Site is developed with a cold storage building, does not contain any wetlands or natural drainage channels, and is located in an urbanized area of the Central City North Community Plan Area of the City of Los Angeles. Therefore, the Project Site does not have the potential to support any riparian or wetland habitat. No federally protected wetlands (e.g., emergent, forested/shrub, estuarine and marine deep water, estuarine and marine, freshwater pond, lake, riverine) occur on or in the vicinity of the Project Site.[10]

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[10] *U.S. Fish and Wildlife Service, National Wetlands Inventory, Wetlands layer: http://www.fws.gov/wetlands/Data/Mapper.html, accessed October, 2013.*

Therefore, the Proposed Project would not result in the direct removal, filling, or hydrological interruption of a federally protected wetland as defined by Section 404 of the Clean Water Act, and no impact to federally protected wetlands would occur as a result of the Proposed Project.

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

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in the interference of wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. The Proposed Project is located in an area that has been previously developed in a heavily urbanized area of the City of Los Angeles. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the Proposed Project vicinity. Therefore, the Proposed Project would not interfere with the movement of any resident or migratory fish or wildlife species.

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

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance, 177,404. The Project Site is located in an urbanized area of the City. The Project Site is completely paved and developed and no significant vegetation exists on the Project Site. No protected biological resources or tree species, such as oak trees, currently exist on the Project Site. Therefore, the Proposed Project would not conflict with any tree preservation policy or ordinance, and no impacts would occur.

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

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, significant impact would occur if a project would be inconsistent with mapping or policies in any conservation plans of the types cited. No locally designated natural communities are known to occur on or adjacent to the Project Site. Therefore, the Proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, and no impact would occur.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. There are no known protected biological resources or habitats in the area. Moreover,

development of the related projects is expected to occur in accordance with adopted plans and regulations. Each of the related projects would be subject to discretionary City approval and project-specific CEQA review that would address biological resources. Thus, cumulative impacts to biological resources would be less than significant.

5. CULTURAL RESOURCES

a) Would the project cause a substantial adverse change in the significance of an historic resource pursuant to §15064.5?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project would disturb historic resources which presently exist within the project site. *State CEQA Guidelines* Section 15064.5 defines a historical resource as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if a project were to adversely affect a historical resource meeting one of the above definitions.

The following analysis is based on the Historical Resources Assessment Report for the Union Ice Company (Union Central Cold Storage) Building, 1525 Industrial Avenue, Los Angeles, California, dated March 2015, by PCR Services Corporation.

Based upon the historical themes and property types developed in the Los Angeles Historic Context Statement in SurveyLA[11] Registration Requirements and Eligibility Standards, there is one significant SurveyLA theme and one property type associated with the Project Site: Early Industrial Development (1880-1945) and Cold Storage Warehouses (1900-1945).[12] Under the City's SurveyLA criteria a Cold Storage Warehouse should retain integrity of Location, Design, Setting, Materials, Feeling and Association.

The on-site building is presently occupied by a building complex commonly known as the Union Central Cold Storage Building, which was historically known as the Union Ice Company. Union Ice was founded in San Francisco in 1882. It was part of the local "ice trust," formed of companies previously in tight competition but which by the turn-of-the-century had opted to work in cooperation with one another instead. In 1900, Union Ice constructed an ice and cold storage plant on Alameda Street between 2nd and 3rd Streets,

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[11] *SurveyLA, the Los Angeles Historic Resources Survey, is a comprehensive program to identify potentially historic resources throughout the City of Los Angeles. Professional historic preservation consultant teams conduct field surveys under the direction of the Department of City Planning, Office of Historic Resources. (Source: City of Los Angeles Department of City Planning, Office of Historic Resources, SurveyLA, website: www.preservation.lacity.org/survey, accessed July 2016.*

[12] *Los Angeles Historic Context Statement Outline, Industrial Development, 1985-1980, Early Industrial Development, 1880-1945 (January 2, 2014):1.*

less than a mile north of the subject property. However, that facility was destroyed by an explosion in 1905 which was the year the subject building was constructed.

Because of technological innovations and changes in the delivery of ice and products, the original Union Ice Company Building was repeatedly altered throughout the decades to keep up with the rapidly changing ice industry to keep it profitable. New refrigeration equipment replaced older equipment and the building was adapted into a cold storage warehouse, which significantly altered the appearance of the Union Ice Company Building. In general, there are seven identified factors of integrity. The Union Ice Company Building has lost six of these integrity factors, including design, workmanship, materials, feeling, association, and setting from the period of significance (1904-1945). For SurveyLA in particular, there are six integrity factors for Cold Storage Warehouses. As noted above these include location, design, setting, materials, feeling and association. Of these factors, only location is retained (although it does not retain its direct adjacency to the rail line that once ran along the rear of the property). The other SurveyLA integrity factors have not been retained due to the regular, ongoing alterations to the building. Further, the Union Ice Company Building is not identified with historic personages or important events. As such, the building does not meet the criteria for inclusion on the California Register of Historical Resources or the National Register of Historic Places as individual resources. Because the building is not a historical resource, the Proposed Project has no direct impact on historic resources. Therefore, the Proposed Project would not cause an adverse change in the significance of a historic resource, and a less than significant impact would occur.

Therefore, the Proposed Project would not cause an adverse change in the significance of a historic resource, and a less than significant impact would occur.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with a project would disturb archaeological resources which presently exist within the project site. Section 15064.5 of the *State CEQA Guidelines* defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources.

The Project Site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas.[13] The Project Site is located in a highly urbanized area of the Central City North Community Plan Area of the City of Los Angeles, and has been partially disturbed by past development activities along with associated control/maintenance of existing buildings. The Proposed Project includes subgrade preparation that would involve the excavation and export of approximately 51,000 cubic yards of soil. Thus, the potential exists for the accidental discovery of archaeological materials. Because the presence or absence of such materials cannot be determined until the site is excavated, periodic monitoring during construction is required to identify any previously unidentified

[13] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.*

archaeological resources uncovered by Project construction activity. With the implementation of Regulatory Compliance Measure RCM 5-1 below, impacts to archaeological resources would be reduced to a less than significant level.

Regulatory Compliance Measures

RCM 5-1 Cultural Resources (Archaeological)

- If any archaeological materials are encountered during the course of project development, all further development activity in the vicinity of the materials shall halt and:

  a. The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.

  b. The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.

  c. The Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report.

- Project development activities may resume once copies of the archaeological survey, study or report are submitted to:

  SCCIC Department of Anthropology
  McCarthy Hall 477
  CSU Fullerton
  800 North State College Boulevard
  Fullerton, CA 92834

- Prior to the issuance of any building permit, the Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered.

- A covenant and agreement binding the Applicant to this condition shall be recorded prior to issuance of a grading permit.

c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with a project were to disturb paleontological resources or geologic features which presently exist within the project site. The Project Site is located in the Central City North Community Plan Area of the City of Los Angeles, and as described above, the Project Site has been previously graded and is currently improved with an industrial building, loading dock, and freight truck and trailer storage area. The Project Site and immediate surrounding areas

do not contain any known vertebrate paleontological resources.[14] Although no paleontological resources are known to exist on site, there is a possibility that paleontological resources exist at sub-surface levels on the Project Site and may be uncovered during subgrade preparation. The project would require the excavation and export of approximately 51,000 cubic yards of soil. Implementation of Regulatory Compliance Measure RCM 5-2 will ensure that if any such resources are found during construction of the Proposed Project, they would be handled according to the proper regulations, and impacts to paleontological resources would be less than significant.

Regulatory Compliance Measure

RCM 5-2 Cultural Resources (Paleontological)

- If any paleontological materials are encountered during the course of project development, all further development activities in the vicinity of the materials shall halt and:

  a. The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
  b. The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
  c. The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report.
  d. Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.

- Prior to the issuance of any building permit, the Applicant shall submit a letter to the case file indicating what, if any, paleontological reports have been submitted, or a statement indicating that no material was discovered.

- A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

d) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect could occur if grading or excavation activities associated with the Proposed Project would disturb previously interred human remains. No known human burials have been identified on the Project Site or its vicinity. However, it is possible that unknown human remains could occur on the Project Site, and if proper care is not taken during construction, damage to or destruction of

[14] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Vertebrate Paleontological Resources in the City of Los Angeles, September 1996.*

these unknown remains could occur. The following mitigation measure is recommended to reduce potential impacts related to the disturbance of unknown human remains to a less than significant level.

Regulatory Compliance Measure

RCM 5-3 Cultural Resources (Human Remains)

- In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

  a. Stop excavation immediately in the vicinity of the remains and contact the County Coroner:
     1104 N. Mission Road
     Los Angeles, CA 90033
     323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
     323-343-0714 (After Hours, Saturday, Sunday, and Holidays)
  b. The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission.
  c. The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
  d. The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
  e. If the most likely descendent does not make recommendations within 48 hours the Applicant shall reinter the remains in an area of the property secure from further disturbance, or;
  f. If the Applicant does not accept the most likely descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission.

Cumulative Impacts

Less Than Significant Impact. Implementation of the Proposed Project in combination with the related projects would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. Development of the related projects is expected to occur in accordance with adopted plans and regulations. Each of the related projects would be subject to discretionary City approval and project-specific CEQA review that would address cultural resources. Thus, cumulative impacts to cultural resources would be less than significant.

6. GEOLOGY AND SOILS

This section summarizes and incorporates by reference information from the Updated Preliminary Geotechnical Subsurface Evaluation and Design Recommendations, Proposed Industrial Street Lofts Mixed-Use Development, 1525 Industrial Street, Los Angeles California, dated January 27, 2014 (Geotechnical Report), and the Draft Geotechnical Addendum Report for Proposed Industrial Street Lofts Mixed-Use Development, 1525 Industrial Street, Los Angeles, CA, dated September 2, 2014 (Addendum),

prepared by LGC Geotechnical, Inc. The Industrial Street Lofts Geotechnical Report and the Addendum are collectively referred to as the Geotechnical Investigation. The design and construction recommendations contained in this report are herein incorporated by reference.

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

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the Industrial Street Lofts Project Site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. Based on criteria established by the California Division of Mines and Geology (CDMG), now called California Geologic Survey (CGS), faults may be categorized as active, potentially active, or inactive. Active faults are those which show evidence of surface displacement within the last 11,000 years (Holocene-age). Potentially active faults are those that show evidence of most recent surface displacement within the last 1.6 million years (Quaternary-age). Faults showing no evidence of surface displacement within the last 1.6 million years are considered inactive for most purposes, with the exception of design of some critical structures.

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 fault rupture potential of these buried thrust faults is inferred to be low. However, the seismic risk of these buried structures in terms of recurrence and maximum potential magnitude is not well established. Therefore, the potential for surface rupture at magnitudes higher than 6.0 cannot be precluded.

In 1972, the Alquist-Priolo Special Studies Zones Act (now known as the Alquist-Priolo Earthquake Fault Zoning Act) was passed into law. The Act defines "active" and "potentially active" faults utilizing the same aging criteria as that used by the CGS, described above. However, established State policy has been to zone only those faults which have direct evidence of movement within the last 11,000 years.

Surface rupture is defined as surface displacement which occurs along the surface trace of the causative fault during an earthquake. Based on the research of available literature described in the Geotechnical Investigation, no known active or potentially active faults underlie the Project Site. In addition, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone.

In addition, the 2011 City of Los Angeles Building Code, updated since the 1994 Northridge Earthquake and with which the Project would be required to comply, contains construction requirements to ensure habitable structures are built to a level such that they can withstand acceptable seismic risk.

Based on the information contained in the Geotechnical Investigation, the Project Site is not located within a seismic hazard zone for liquefaction, landsliding, or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Alquist-Priolo Act. The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, and there are no known faults (active, potentially active, or inactive) on-site. The possibility of damage due to ground rupture is considered low since active faults are not known to cross the Project Site. Therefore, impacts related to ground rupture from known earthquake faults would be less than significant.

(ii) Strong seismic ground shaking?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California. The Project Site is located within a seismically active region, as is all of Southern California. The intensity of ground shaking depends primarily upon the earthquake magnitude, the distance from the source, and the site response characteristics. As discussed previously, the Project Site is not located within a seismic hazard zone for liquefaction, landsliding, or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Alquist-Priolo Act. The primary seismic hazard for this project is the potential for strong ground motion from future earthquakes within the Los Angeles Basin. Secondary effects of seismic shaking resulting from large earthquakes on the major faults in the Southern California region which may affect the site include ground lurching and shallow ground rupture, soil liquefaction, dynamic settlement, seiches and tsunamis. These secondary effects of seismic shaking are a possibility throughout the Southern Californian region and are dependent on the distance between the site and causative fault and the on-site geology. The major active nearby (within about 15 km) faults that could produce these secondary effects include the Elysian Park, Puente Hills, Hollywood, Santa Monica, Newport-Inglewood, and Verdugo Faults (USGS, 2008). However, the potential for strong ground motion at this site is not unusual for Southern California. With regard to the potential occurrence of potentially catastrophic geotechnical hazards such as fault rupture, earthquake-induced landslides, liquefaction, etc. the following geotechnical recommendations should provide adequate protection for the proposed development to the extent required to reduce seismic risk to an "acceptable level." Site parameters for seismic design are presented in Section 2.4 of the Geotechnical Report.

Seismically induced settlement is often caused when loose to medium-dense granular soils are densified during ground shaking. Based on the Geotechnical Investigation's subsurface evaluation, site soils are generally loose to very dense sands with varying amounts of silts and gravels to the maximum explored depth of approximately 38 feet. Blow counts/density generally increased with depth. The geotechnical explorations indicated undocumented fill soils and loose to medium dense silty sands with occasional soft to medium stiff sandy silts in the upper approximate 8 feet. Significant zones of sands with very low fines content and low moisture content were encountered at depths greater than typically about 5 feet below existing grade. These soils are considered very susceptible to caving. Due to the loose/soft nature of near surface soils, earthwork removals will be required in order to support the planned improvements. It is anticipated that the proposed structures may be supported on a shallow foundation system provided

adequate earthwork removals are performed. Deepened footings may be required where adequate lateral earthwork removals cannot be performed due to property line constraints. Additionally, due to presence of existing structures currently encompassing the majority of the site and the nature of the site being used as a cold storage facility, additional geotechnical explorations should be performed at the completion of demolition of existing structures to confirm, or modify if necessary, the Geotechnical Investigation's preliminary recommendations.

Therefore, potential for seismically induced settlement at the Project Site is considered small and the geotechnical conditions are favorable for foundations, as well as the permanent retaining structure, provided that the recommendations specified in the Geotechnical Report are included in the design and construction of the Proposed Project to the satisfaction of the Department of Building and Safety. Additionally, the design and construction of the Project is required to comply with the most current codes regulating seismic risk, including the California Building Code and the LAMC, which incorporates the International Building Code (IBC). Compliance with current California Building Code and LAMC requirements would minimize the potential to expose people or structures to substantial risk, loss, or injury. Accordingly, the following regulatory compliance measures would reduce impacts associated with seismic hazards to a less than significant level.

Regulatory Compliance Mitigation Measures

RCM 6-1 Seismic

- The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

RCM 6-2 Geotechnical Investigation

- The Applicant shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Industrial Street Lofts Project, and as it may be subsequently amended or modified.

(iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project site is located within a liquefaction zone. Liquefaction is the loss of soil strength or stiffness due to a buildup of pore-water pressure during severe ground shaking. Liquefaction is associated primarily with loose (low density), saturated, fine- to medium-grained, cohesionless soils. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

According to the CDMG Seismic Hazard Zones Map of the Los Angeles Quadrangle (1999), and the City of Los Angeles Seismic Safety Element (1990), the Proposed Project Site is not located within an area identified as having a potential for liquefaction. This classification is consistent with the Geotechnical Report's site-specific observations, which indicate that due to the general dense nature of site soils and lack

of shallow groundwater the potential for liquefaction and seismically induced settlement is expected to be very low.

The Geotechnical Report finds that the subsurface profile at the site consists of loose to very dense sands with varying amounts of silts and gravels to the maximum explored depth of approximately 38 feet. Blow counts/density generally increased with depth. The geotechnical explorations indicated undocumented fill soils and loose to medium dense silty sands with occasional soft to medium stiff sandy silts in the upper approximate 8 feet. The lateral and vertical extents should be further refined based on additional geotechnical explorations. Soil moisture content generally ranged from slightly moist to very moist (well above optimum moisture content). Soil moisture content varied, but generally higher moisture contents were observed in the upper approximate 5 feet with lower moisture contents (well below optimum moisture content) at greater depths. Significant zones of sands with very low fines content and low moisture content were encountered at depths greater than typically about 5 feet below existing grade. These soils are considered very susceptible to caving. Groundwater was not encountered in borings to the maximum depth of about 38 feet below existing ground surface. The historic high groundwater table for the site is estimated at 100 feet or greater below the existing ground surface. Due to the loose/soft nature of near surface soils, earthwork removals will be required in order to support the planned improvements.

Therefore, the potential for liquefaction to result in significant structural damage at the Project Site is low and a less than significant impact would occur.

(iv) Landslides?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. A project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding. According to the Geotechnical Report, the Proposed Project is not located within a seismic hazard zone for liquefaction, landsliding or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Alquist-Priolo Act. Additionally, due to the subsurface geotechnical characteristics, the relatively flat nature of the Project Site and very low potential for liquefaction, the potential for lateral spreading is expected to be very low. Therefore the probability of landslides, including seismically induced landslides, is considered to be very low, and no impact would occur.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have significant sedimentation or erosion impacts if it would: (a) constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or (b) accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site. Although development of the Proposed Project has the potential to result in the erosion of soils during site preparation and construction activities, erosion would

be reduced by implementation of stringent erosion controls imposed by the City of Los Angeles through grading and building permit regulations. Minor amounts of erosion and siltation could occur during grading.

The area surrounding the Project Site is paved and developed, and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. During construction, the Project would be required to prevent the transport of sediments from the site by stormwater runoff and winds through the incorporation of appropriate Best Management Practices (BMPs). These BMPs would be detailed in a Low Impact Development Plan and, if applicable, a Stormwater Pollution Prevention Plan (SWPPP), which would be in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations and would be approved by the City Engineer. With implementation of the required construction BMPs (as described in Regulatory Compliance Measure 6-3), the impacts of soil erosion during construction would be less than significant.

The potential for soil erosion during the ongoing operation of the Proposed Project is extremely low due to the generally level topography of the Project Site and the fact that the Project Site would be mostly paved-over or built upon, so little soil would be exposed. All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. With implementation of Regulatory Compliance Measure RCM 6-3, a less-than-significant impact would occur with respect to erosion or loss of topsoil. This compliance measure is in addition to any conditions that may be imposed by the City of Los Angeles Department of Building and Safety's Soils Report Approval Letter.

Long-term operation of the Proposed Project would not result in substantial soil erosion or loss of topsoil. The majority of the Project Site would be covered by the proposed live/work structures. Thus, no exposed areas subject to erosion would be created or affected by the Project. Therefore, the impacts of soil erosion during Proposed Project operation would be less than significant.

Regulatory Compliance Measures

RCM 6-3 Erosion/Grading/Short-Term Construction Impacts

- The Applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.
- Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. The Applicant shall implement Best Management Practices ("BMPs") during grading and excavation to reduce erosion, including, but not limited to the following:
  a. Excavation and grading activities shall be scheduled during dry weather periods to the extent practical. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.

b. Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.

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

Less Than Significant. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it could cause or accelerate geologic hazards causing substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if the Proposed Project is built in an unstable area without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. The Geotechnical Investigation concluded that the potential for seismically induced settlement at the Project Site is considered small and the geotechnical conditions are favorable for foundations, as well as the permanent retaining structure, provided that the recommendations specified in the Geotechnical Investigation are included in the design and construction of the Proposed Project to the satisfaction of the Department of Building and Safety. Construction of the Proposed Project would comply with the City of Los Angeles Uniform Building Code (Building Code), which is designed to assure safe construction and includes building foundation requirements appropriate to site conditions. With the implementation of Building Code requirements and regulatory compliance measures RCM 6-1 and RCM 6-2, above, the potential for landslide, lateral spreading, subsidence, liquefaction, or collapse would be reduced to a less-than-significant level.

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

Less Than Significant. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and which shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Without proper mitigation measures, heaving and cracking of both building foundations and slabs-on-grade could result.

The Geotechnical Report finds that the subsurface profile at the site consists of loose to very dense sands with varying amounts of silts and gravels to the maximum explored depth of approximately 38 feet, and no significant amounts of clay particles. Nonetheless, the Geotechnical Report includes recommendations to address and mitigate the potential effects of expansive soils. In addition, construction of the Proposed Project would be required to comply with the City of Los Angeles Uniform Building Code, which includes building foundation requirements appropriate to site-specific conditions, as recommended in the Geotechnical Report. Therefore, impacts related to expansive soil would be reduced to less than significant

levels with adherence to the geotechnical recommendations in the Project Geotechnical Investigation (see RCM 6-2, above).

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

No Impact. This question would apply to the Proposed Project only if it was located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems neither are necessary, nor are they proposed. Therefore, no impacts related to alternative wastewater disposal systems would occur.

Cumulative Impacts

Less Than Significant Impact. Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Proposed Project and the related projects. Similar to the proposed developments and future development of the related projects with respect to geology and soils would be assessed on a case-by-case basis. Also similar to the Proposed Project, the related projects would be required to comply with the most current codes regulating seismic risk, including the California Building Code and the LAMC, which incorporates the International Building Code (IBC), as well as the recommendations of site-specific geotechnical reports. Furthermore, the analysis of the Project's geology and soils impacts concluded that, through the implementation of the mitigation measures recommended above, potential impacts would be reduced to less than significant levels. Therefore, cumulative geology and soil impacts would be less than significant.

7. GREENHOUSE GAS EMISSIONS

GHG and Global Climate Change Background

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. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere regulates the earth's temperature. The State of California has undertaken initiatives designed to address the effects of greenhouse gas emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California.

The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H_2O). CO_2 is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2e).

California has enacted several pieces of legislation that relate to GHG emissions and climate change, much of which sets aggressive goals for GHG reductions within the state. Per Senate Bill 97, the California

Natural Resources Agency adopted amendments to the CEQA Guidelines, which address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project's effects on the environment. However, neither a threshold of significance nor any specific mitigation measures are included or provided in these CEQA Guideline amendments.

Regulatory Environment

Assembly Bill 32 (Statewide GHG Reductions)

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires the California Air Resources Board (CARB) to develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed to set a statewide GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020. As previously determined by CARB, California had to reduce GHG emissions to a level approximately 28.4% below CARB's 2020 "business-as-usual" GHG emission projections (as set forth in the 2008 Scoping Plan) to achieve this goal.[15] The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions. Key AB 32 milestones were as follows:

- June 30, 2007—Identification of discrete early action greenhouse gas emissions reduction measures. On June 21, 2007, CARB satisfied this requirement by approving three early action measures. These were later supplemented by adding six other discrete early action measures.
- January 1, 2008—Identification of the 1990 baseline GHG emissions level and approval of a statewide limit equivalent to that level. Adoption of reporting and verification requirements concerning GHG emissions. On December 6, 2007, CARB approved a statewide limit on GHG emissions levels for the year 2020 consistent with the determined 1990 baseline.
- January 1, 2009—Adoption of a scoping plan for achieving GHG emission reductions. On October 15, 2008, CARB issued a "discussion draft" Scoping Plan entitled "Climate Change Draft Scoping Plan: A Framework for Change" (Draft Scoping Plan). CARB adopted the Draft Scoping Plan at its December 11, 2008 meeting.
- January 1, 2010—Adoption and enforcement of regulations to implement the "discrete" actions.
- January 1, 2011—Adoption of GHG emissions limits and reduction measures by regulation.
- January 1, 2012—GHG emissions limits and reduction measures adopted in 2011 become enforceable.

Emission reduction measures that could not be initiated in the 2007-2012 timeframe were considered in the Scoping Plan, which was published by CARB in December 2008. The Scoping Plan is defined by AB 32

[15] *CARB has not calculated the percent reduction required to achieve AB 32's mandate of returning to 1990 levels of GHG emissions by 2020. The value of 28.4% is the required reduction to achieve 1990 emissions in 2020 is an approximate value. Based on the Scoping Plan estimates and conservative rounding, the value could be 28.5%.*

as "achieving the maximum technologically feasible and cost-effective reductions in GHG emissions from sources or categories of sources of GHGs by 2020." Scoping Plan measures include direct emission reductions, alternative compliance mechanisms, market-based compliance mechanisms, and potential monetary and non-monetary incentives for sources for categories. By January 1, 2014 and every five years thereafter, CARB will update its Scoping Plan.

CARB developed a list of "discrete early actions" to reduce GHG emissions. Early action measures are those that were developed for implementation by January 2010. CARB approved the expanded list of early action measures on October 25, 2007. The nine discrete early action measures are:

- Increased Methane Capture from Landfills: On June 17, 2010, the regulation to reduce CH_4 emissions from municipal solid waste (MSW) landfills became effective. It requires owners and operators of certain uncontrolled MSW landfills to install gas collection and control systems, and requires existing and newly installed gas collection and control systems to operate in an optimal manner. The regulation is a discrete early action measure to reduce greenhouse gas emissions in California as described in the Global Warming Solutions Act. The Landfill Methane Control Measure incorporates the Intergovernmental Panel on Climate Change (IPCC's) calculation methods.
- Low-Carbon Fuel Standard (LCFS): Requires the implementation of a low carbon fuel standard that reduces the carbon content of fuels used for motor vehicles.
- Reduction of Motor Vehicle A/C Refrigerant Losses: This measure restricts the sale of "do-it-yourself" automotive refrigerants to the public. This will restrict the refrigerant changes to professionals and will, as a result, reduce losses of these high global warming potential (GWP) gases.
- Smartway Truck Efficiency: Requires existing trucks and trailers to be retrofitted with devices that reduce aerodynamic drag, thus resulting in a 1.3 million metric tonne (MMT) reduction of GHG equivalents as well as reducing fuel consumption.
- Port electrification: This measure will require docked ships to shut off their auxiliary engines by plugging into shoreside electrical outlets. This project will also reduce GHG emissions by 500,000 MT every year.
- Reduction of perfluorocarbons from the semiconductor industry: Alternative chemistry development, emissions abatement, and recovery and recycling will lessen GHG emissions by 500,000 MT annually.
- Reduction of propellants in consumer products: Aerosols, tire inflators, electronics cleaning, and dust removal products all contain propellants that contribute an estimated 300,000 MT of GHG emissions in California every year.
- Tire inflation: CARB will craft regulations requiring tune-up, smog check, and oil change mechanics to ensure proper tire inflation as part of overall service. California will see a 200,000 MT reduction in GHG emissions.
- SF_6 reductions from non-electricity sector: CARB proposes to ban the use of SF_6 from non-essential uses if viable alternatives are available.

As of April 22, 2010, 14 of 30 CARB regulations were approved, including all nine discrete early actions as required by AB 32. It is estimated that the nine proposed discrete early actions will provide approximately 16 MMTCO2e of GHG reductions while the other early actions will provide approximately 26 MMTCO2e of GHG reductions. It also is anticipated that an additional 30 MMTCO2e in reductions will be achieved from the passage of anti-idling measures and AB 1493.6. The remaining reductions necessary to achieve the goals of AB 32 (i.e., 1990 levels by 2020) are expected to be achieved through CARB's Scoping Plan and other emission reduction efforts by members of the Climate Action Team (CAT).

In May 2014, CARB published the First Update to the Climate Change Scoping Plan, where it revised the previously adopted 1990 GHG emissions level from 427 $MMTCO_2e$ to 431 $MMTCO_2e$ based on the scientifically updated global warming potential (GWP) values in the Intergovernmental Panel on Climate Change's (IPCC's) Fourth Assessment Report.[16] The total emissions expected in the 2020 BAU scenario were also updated from the previously adopted estimate of 596 $MMTCO_2e$ to 509 $MMTCO_2e$. The updated 2020 BAU scenario includes reductions anticipated from Pavley I and the Renewable Electricity Standard which are now adopted into law. As shown in Table III-5, below, the State anticipates it will meet its 2020 GHG emissions limit of 431 $MMTCO_2e$ through reductions in energy, transportation, waste and high-GWP sectors. The Cap-and-Trade Regulation provides a firm cap, ensuring that the 2020 statewide emission limit will not be exceeded. Thus, the estimated emission reductions attributed to the Cap-and-Trade Program depend on the emissions forecast. For example, if the emissions forecast increases, the reductions associated with the Cap-and- Trade Program will increase.

Table IV-5
Climate Change Scoping Plan 2020 Emissions Target

Category	2020 CO_2e Emissions ($MMTOC_2e$) [a]
AB 32 Baseline 2020 Forecast Emissions (2020 BAU)	509
Expected Reductions from Sector-Based Measures	
Energy	25
Transportation	23
High-GWP	5
Waste	2
Cap and Trade Reductions	23 [b]
2020 Limit	431

[a] Based on AR4 GWP values.
[b] Cap and Trade emissions reductions depend on the emission forecast.
Source: CARB, First Update to the Climate Change Scoping Plan, May 2014.

16 *The IPCC is the leading international body for the scientific assessment of climate change established in 1988 under the auspices of the United Nations.*

California Senate Bills 1078, 107, and 2; Renewables Portfolio Standard

Established in 2002 under California Senate Bill 1078 and accelerated in 2006 under California Senate Bill 107, California's RPS requires retail suppliers of electric services to increase procurement from eligible renewable energy resources by at least 1 percent of their retail sales annually, until they reach 20 percent by 2010.

On April 2, 2011, Governor Jerry Brown signed California Senate Bill 2 to increase California's RPS to 33 percent by 2020. This new standard also requires regulated sellers of electricity to procure 25 percent of their energy supply from certified renewable resources by 2016.

Low Carbon Fuel Standard

California Executive Order S-01-07 (January 18, 2007) requires a 10 percent or greater reduction in the average carbon intensity for transportation fuels in California regulated by CARB. CARB identified the LCFS as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009.

Sustainable Communities and Climate Protection Act (SB 375)

California's Sustainable Communities and Climate Protection Act, also referred to as Senate Bill (SB) 375, became effective January 1, 2009. The goal of SB 375 is to help achieve AB 32's GHG emissions reduction goals by aligning the planning processes for regional transportation, housing, and land use. SB 375 requires CARB to develop regional reduction targets for GHGs, and prompts the creation of regional plans to reduce emissions from vehicle use throughout the State. California's 18 Metropolitan Planning Organizations (MPOs) have been tasked with creating Sustainable Community Strategies (SCS) in an effort to reduce the region's vehicle miles traveled (VMT) in order to help meet AB 32 targets through integrated transportation, land use, housing and environmental planning. Pursuant to SB 375, CARB set per-capita GHG emissions reduction targets from passenger vehicles for each of the State's 18 MPOs. On September 23, 2010, CARB issued a regional eight (8) percent per capita reduction target for the planning year 2020, and a conditional target of 13 percent for 2035.

With respect to motor vehicles, page 48 of the 2008 Scoping Plan states that local governments will play a significant role in the regional planning process to reach passenger vehicle greenhouse gas emissions reduction targets. Local governments have the ability to directly influence both the siting and design of developments in a way that reduces greenhouse gases associated with vehicle travel, as well as energy, water, and waste. A partnership of local and regional agencies is needed to create a sustainable vision for the future that accommodates population growth in a carbon efficient way while meeting housing needs and other planning goals. Integration of the sustainable communities' strategies or alternative planning strategies with local general plans will be key to the achievement of these goals. State, regional, and local agencies must work together to prioritize and create the supporting policies, programs, incentives, guidance, and funding to assist local actions to help ensure regional targets are met. Enhanced public transit service combined with incentives for land use development that provides a better market for public transit will play an important role in helping to reach regional targets. Thus, based on the above targets noted in the Scoping

Plan, a new development Project that can demonstrate it directly influences both the siting and design of new developments in a way that reduces greenhouse gases associated with vehicle travel would be considered consistent with statewide GHG-reduction goals and policies, including AB 32, and does not make a cumulatively considerable contribution to global warming.

2012–2035 RTP/SCS

On April 4, 2012, the Regional Council of the Southern California Association of Governments (SCAG) adopted the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy: Towards a Sustainable Future (2012–2035 RTP/SCS). Within the RTP, the SCS demonstrates the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB. The SCS sets forth a regional plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The regional vision of the SCS maximizes current voluntary local efforts that support the goals of SB 375, as evidenced by several Compass Blueprint Demonstration Projects and various county transportation improvements. The SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures. Finally, the 2012–2035 RTP/SCS fully integrates the two subregional SCSs prepared by the Gateway Cities and Orange County Council of Governments. On June 4, 2012, CARB accepted SCAG's quantification of GHG emission reductions from the 2012–2035 RTP/SCS and the determination that the 2012–2035 RTP/SCS would, if implemented, achieve the 2020 and 2035 GHG emission reduction targets established by CARB.[17]

SCAQMD

SCAQMD has released draft guidance regarding interim CEQA GHG significance thresholds. In October 2008, SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 metric tons of CO2e per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where SCAQMD is lead agency. However, SCAQMD has yet to formally adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds.

Local Policies and Regulations

The City is addressing the issue of global climate change through implementation of the Green LA, An Action Plan to Lead the Nation in Fighting Global Warming (LA Green Plan), which outlines the goals and actions that the City has established to reduce the generation and emission of GHGs from public and private activities. According to the LA Green Plan, the City is committed to the goal of reducing emissions of CO_2 to 35 percent below 1990 levels by the year 2030. To achieve this goal, the City is increasing the generation

[17] *CARB Executive Order G-12-039.*

of renewable energy, improving energy conservation and efficiency, and changing transportation and land use patterns to reduce dependence on automobiles.

LA Green Building Code

In 2010, the City adopted the 2010 California Green Building Standards Code, also known as CALGreen, with amendments, as Ordinance No. 181,480, thereby codifying provisions of CALGreen as the new Los Angeles Green Building Code ("LA Green Building Code"). As of January 2011, the LA Green Building Code is applicable to the construction of new buildings (residential and nonresidential), building alterations with a permit valuation of over $200,000, and residential and nonresidential building additions. The LA Green Building Code contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. The L.A. Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy Commission on December 17, 2008, and meet 50 percent construction waste recycling levels. In addition, the Proposed Project is required to implement applicable energy conservation measures to reduce GHG emissions such as those described in AB 32, described above.

GHG Significance Threshold

The *L.A. CEQA Thresholds Guide* does not provide any guidance as to how climate change issues are to be addressed in CEQA documents. Furthermore, neither the SCAQMD nor the State CEQA Guidelines Amendments provide any adopted thresholds of significance for addressing a mixed-use project's GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines Amendments serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City of Los Angeles does not have an adopted quantitative threshold of significance for a mixed-use project's generation of greenhouse gas emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines.

As required in Section 15064.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) an estimate of the amount of greenhouse gas emissions resulting from the Proposed Project; (2) a qualitative analysis or performance based standards; (3) a quantification of the extent to which the Projects increase greenhouse gas emissions as compared to the existing environmental setting; and (4) the extent to which the Project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Guidelines Section 15064.4 states a lead agency "should consider," among other factors, "[t]he extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting" (id., subd. (b)(1)) and "[w]hether the project emissions exceed a threshold of significance that the lead agency determines applies to the project" (id., subd. (b)(2). The Guidelines, however, do not mandate the use of absolute numerical thresholds to measure the significance of greenhouse gas emissions.

For purposes of this analysis, a significant impact would occur if the Proposed Project's design features are not substantially consistent with the applicable policies and/or regulations outlined in the Scoping Plan, SB 375, SCAG's 2012-2035 RTP/CSC, and the LA Green Building Code.

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

Construction Impacts

Less Than Significant Impact. Construction of the Proposed Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. These impacts would vary day to day over the 28-month duration of construction activities. Construction emissions represent an episodic, temporary source of GHG emissions. Emissions are generally associated with the operation of construction equipment and the disposal of construction waste. To be consistent with the guidance from the SCAQMD for calculating criteria pollutants from construction activities, only GHG emissions from onsite construction activities and off-site hauling and construction worker commuting are considered Project generated. As explained by California Air Pollution Controls Officers Association (CAPCOA) in its 2008 white paper, the information needed to characterize GHG emissions from manufacture, transport, and end-of-life of construction materials would be speculative at the CEQA analysis level. CEQA does not require an evaluation of speculative impacts (*CEQA Guidelines §15145*). Therefore, the construction analysis does not consider such GHG emissions, but does consider non-speculative onsite construction activities and off-site hauling and construction worker trips. All GHG emissions are reported on an annual basis.

Emissions of GHGs were calculated using CalEEMod for each year of construction of the Proposed Project and the results of this analysis are presented in Table IV-6, Proposed Project Construction-Related Greenhouse Gas Emissions. As shown in Table IV-6, the total GHG emissions from construction activities related to the Proposed Project would be 2,008 metric tons. Pursuant to the guidance set forth in the draft SCAQMD GHG Threshold Guidance document released in October 2008, the Project's construction emissions are amortized for a project lifetime of 30 years to ensure that GHG reduction measures address construction GHG emissions as part of the operational reduction strategies.[18] Therefore, the project's total construction emissions were distributed over 30 years to yield an average of 67 MTCO2e per year.

[18] *South Coast Air Quality Management District (SCAQMD). 2008. Greenhouse Gases (GHG) CEQA Significance Thresholds. Website: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysishandbook/ghg-significance-thresholds. March 5, 2014.*

Table IV-6
Proposed Project Construction-Related Greenhouse Gas Emissions

Year	CO_2e Emissions (Metric Tons per Year) [a]
2016	1,006
2017	1,002
Total Construction GHG Emissions	**2,008**

[a] *Construction CO_2 values were derived using CalEEMod Version 2013.2.2 Calculation data and results are provided in Greenhouse Gas Emissions Calculations Worksheets. (See Appendix C to this MND)*

Operation Impacts

Baseline GHG Emissions

The average daily GHG emissions generated by the existing Project Site have been estimated utilizing the CalEEMod computer model recommended by the SCAQMD. Table IV-7, Existing Project Site Greenhouse Gas Emissions, presents the GHG emissions associated with existing operations at the Project Site. As shown in Table IV-7, the existing operations on the Project Site generate approximately 4,893 CO_2e MTY.

Table IV-7
Existing Project Site Greenhouse Gas Emissions

Emissions Source	CO_2e Emissions (Metric Tons per Year)
Natural Gas Consumption	5
Electricity Demand	790
Solid Waste Generation	399
Water Consumption	3,283
Motor Vehicles	416
Total	**4,893**
Calculation data and results provided in Greenhouse Gas Emissions Calculations Worksheets. (See Appendix C to this MND)	

Proposed Project GHG Emissions

Less Than Significant Impact. The GHG emissions resulting from operation of the Proposed Project, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment and generation of solid waste and wastewater, were calculated under two separate scenarios in order to illustrate the effectiveness of the Project's compliance with the LA Green Building Code and other applicable plans such as SB 375 and SCAG's 2012-2035 RTP/SCS that aim to reduce the regions GHG emissions by encouraging mixed-use developments on infill lots that are in close proximity to transit. Consistent with these plans and policies, the Proposed Project incorporates the following design features and building code compliance actions that would reduce the carbon footprint of the development:

1. **In Fill Development.** The Proposed Project is located on an infill development site that is currently an active warehouse facility. The Project Site is occupied by an approximate 81,194 square foot industrial building which generates GHG emissions estimated at approximately 4,893 CO_2e MTY associated with its energy use and associated transportation emissions. The redevelopment of the site would eliminate these emissions resulting in a significant reduction to the GHG emissions which would otherwise continue if the project was located on a vacant site.

2. **GHG Emissions Associated with Energy Demand**. The Project must meet Title 24 2008 standards and include ENERGY STAR appliances. Energy Star-rated appliances would reduce the projects energy demand during the operational life of the 344 dwelling units. An approximate 16% reduction in energy demand and associated GHG emissions is attributable to compliance with Title 24 standards and the installation of Energy Start appliances.

3. **GHG Emissions Associated with Solid Waste Generation.** The Project is subject to construction waste reduction of at least 50 percent. In addition, Project Site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. Finally, the Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.

4. **GHG Emissions Associated with Water Use**. As mandated by the LA Green Building Code, The Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce

potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. An approximate 16% reduction in water demand and associated GHG emissions is attributable to compliance with this measure.

The Proposed Project's operational GHG emissions are shown in Table IV-8, Proposed Project Operational Greenhouse Gas Emissions. For comparative purposes, and to demonstrate the effect of the Project's consistency with regional and local plans aimed at reducing GHG emissions, Table IV-8 shows GHG emissions for a comparable sized project without the GHG-reducing features described above. As shown, the net increase in GHG emissions generated by the Proposed Project under the Project Without GHG Reduction Measures would be 7,721 CO_2e MTY and the Proposed Project under the Project With GHG Reduction Measures scenario would result in a net increase of 1,475 CO_2e MTY compared to existing conditions.[19] The relatively low net increase in GHG emissions compared to existing conditions is due to the removal of an existing ice generation and food storage facility which has a high existing demand for water and electricity. As shown, an approximate 80% reduction in GHG emissions would occur as a result of the implementation of the LA Green Building Code, the Project's mixed-use design, in fill development characteristics, and proximity to transit.

Table IV-8
Proposed Project Operational Greenhouse Gas Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)		
	Project Without GHG Reduction Measures	**Project With GHG Reduction Measures**	**Percent Reduction**
Area	6	6	0%
Energy	3,128	2,631	16%
Waste	106	53	50%
Water	340	287	16%
Mobile (Motor Vehicles)	4,074	3,324	18%
Construction Emissions [a]	67	67	--
Project Total	**7,721**	**6,368**	**18%**
Less Existing Project Site		*4,893*	--
Project Net Total	**7,721**	**1,475**	**80%**

[a] The total construction GHG emissions were amortized over 30 years and added to the operation of the Project. Calculation data and results provided in Greenhouse Gas Emissions Calculations Worksheets.

In addition to the GHG emission reductions described above, it is important to note that the CO2 estimates from mobile sources (particularly CO2, CH4, and N2O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new

[19] *As shown in Table IV-8, the Project's total combined annual GHG emissions would be below the SCAQMD's draft threshold of 3,000 metric tons per year for commercial/residential projects. While the SCAQMD has not formally adopted this threshold, it provides further substantial evidence that the Project would not make a considerable contribution to cumulative impacts with respect to GHG emissions.*

sources and that emissions from these sources are 100 percent additive to existing conditions. This is a standard approach taken for air quality analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the air basin and are in effect new emissions sources, or whether they are sources that were already in the air basin and just shifted to a new location. Because the effects of GHGs are global, a project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

For example, if a substantial portion of California's population migrated from the South Coast Air Basin to the San Joaquin Valley Air Basin, this would likely decrease GHG emissions in the South Coast Air Basin and increase emissions in the San Joaquin Valley Air Basin, but little change in overall global GHG emissions. However, if a person moves from one location where the land use pattern requires auto use (commuting, shopping, etc.) to a new development that promotes shorter and fewer vehicle trips, more walking, and overall less energy usage, then the new development would result in a potential net reduction in global GHG emissions.

Consistency with AB 32 Scoping Plan

Table IV-9
Consistency with Applicable AB 32 Scoping Plan Measures

Energy Efficiency. Maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	**Consistent**. The Project would be designed and constructed to meet LA Green Building Code standards by including several measures designed to reduce energy consumption.
Renewables Portfolio Standard. Achieve 33 percent renewable energy mix statewide.	**Consistent**. The Project would use energy from the Los Angeles Department of Water and Power (LADWP), which has goals to diversify its portfolio of energy sources to increase the use of renewable energy.
Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Consistent**. The Project would be designed and constructed to meet Cal Green building standards and will include several measures designed to reduce energy consumption.
Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling. Move toward zero waste.	**Consistent**. The Project would result in a less than significant impact on landfill capacity. (see response to Checklist Question 17(f), below)
Water. Continue efficiency programs and use cleaner energy sources to move and treat water.	**Consistent**. The Project would use water-efficient landscaping including point-to-point irrigation and a smart controller drip system to reduce water use.
Measures not listed are not applicable to this project. *Source: Parker Environmental Consultants*	

Consistency with SB 375

California SB 375 requires integration of planning processes for transportation, land-use and housing. Under the bill, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet the target provided in the Scoping Plan, created by CARB, for reducing GHG emissions. SB 375 requires SCAG to direct the development of the SCS for the region. A discussion of the Project's consistency with the SCS is provided further below.

Consistency with 2012-2035 RTP/SCS

The Project would be consistent with the following key GHG reduction strategies in SCAG's 2012-2035 RTP/SCS which are based on changing the region's land use and travel patterns:

- Compact growth in areas accessible to transit;
- More multi-family housing;
- Jobs and housing closer to transit;
- New housing and job growth focused in High Quality Transit Areas (HQTA); and
- Biking and walking infrastructure to improve active transportation options, transit access.

The Project represents an infill development within an existing urbanized area that would concentrate new residential and neighborhood serving commercial uses within a High Quality Transit Area (HQTA), the 2012-2035 RTP/SCS defines as generally walkable transit villages or corridors that are within 0.5-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Based on a transit availability assessment of the Project area by WalkScore.com, the Project Site is rated with a score of 74 of 100 possible points and defined as "Transit is convenient for most trips." Based on a walkability assessment of the Project area by WalkScore.com, the Project Site is rated with a score of 81 of 100 possible points and defined as "Very Walkable so most errands can be accomplished on foot." In addition, the Project would also provide bicycle storage areas for Project residents and guests. The Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in vehicle miles traveled and related vehicular GHG emissions. These and other measures would further promote a reduction in vehicle miles traveled and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2012–2035 RTP/SCS.

Consistency with L.A. Green Building Code

The Los Angeles Green Building Ordinance requires that all projects filed on or after January 1, 2014, must comply with the L.A. Green Building Code. Mandatory measures under the L.A. Green Building Code that would help reduce GHG emissions include short and long term bicycle parking measures; designated parking measure; and electric vehicle supply wiring. The Project would comply with these mandatory measures as the Project would provide 49 short-term bicycle parking spaces and 351 long-term bicycle parking spaces; and would include a minimum number of equal to ten percent of the total number of parking spaces will include Electric Vehicle (EV) Charging Stations pursuant to the LA Green Building Code.

Furthermore, the LA Green Building Code includes elective measures that would increase energy efficiency of the Project. The Project would include various elective measures including, but not limited to, installing Energy Star rated appliances, installation of a submeter, and installation of water-conserving fixtures. Therefore, the Project is consistent with the L.A. Green Building Code.

Cumulative Impacts

An individual project's GHG emissions typically would be relatively very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change, which can cause the adverse environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions determines whether a project's contribution to global climate change is "cumulatively considerable." Many regulatory agencies, including the SCAQMD, concur that GHG and climate change should be evaluated as a potentially significant cumulative impact, rather than a project direct impact. Accordingly, the GHG analysis presented in this Section analyzes whether the Proposed Project would be cumulatively considerable using a plan-based approach (supported by quantitative and qualitative analysis) to determine the projects' contributing effect on climate change.

Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, it is speculative to identify the specific impact, if any, to global climate change from one project's incremental increase in global greenhouse gas emissions. The project's greenhouse gas emissions and the resulting level of significance is appropriately assessed in terms of the cumulative impact on global GHG emission on climate change. Accordingly, a quantified analysis of the GHG emissions anticipated to result from construction and operational activities was calculated as part of the cumulative impact analysis. As part of that analysis, the Proposed Project's GHG emissions were analyzed on a project-specific basis with respect to its impacts on global climate change.

As shown in the tables above, the Proposed Project is consistent with statewide goals and policies in place for the reduction of greenhouse gas emissions, including AB 32, SB 375, the 2012-2035 RTP/SCS, and the LA Green Building Code. Therefore, the contributions of the Proposed Projects and the related projects to cumulative GHG emissions would not be cumulatively considerable.

Conclusion

Through required implementation of the L.A. Green Building Code, the Project's mixed-use design, and the Project's proximity to transit, the Proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including CARB's AB 32 Scoping Plan aimed at achieving 1990 GHG emission levels by 2020, SB 375, the 2012-2035 RTP/SCS, and the LA Green Building Code. Therefore, the Proposed Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to GHG emissions, and impacts would be less than significant.

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

Less than Significant Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if the Proposed Project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The Proposed Project will comply with the City of Los Angeles' Green Building Ordinance standards that are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the State's codes. As described above and in Question 7(a), the Proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including CARB's AB 32 Scoping Plan, SB 375, the 2012-2035 RTP/SCS, and the LA Green Building Code. Therefore, the Proposed Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases and, the Proposed Project's individual and cumulative impact would be less than significant.

8. HAZARDS AND HAZARDOUS MATERIALS

This section is based on the following report:

- Phase I Environmental Site Assessment (Phase I ESA) by Tetra Tech BAS (BAS), January 2013.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Proposed Project includes the construction of a mixed-use project with up to 344 live/work units, 24,044 square feet of creative office uses, and 5,500 square feet of restaurant uses. No hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the site and use of these substances would comply with State Health Codes and Regulations. Therefore, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and a less than significant impact would occur.

Construction could involve the use of potential hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. There is nothing unique or specific about the Proposed Project or its location that would warrant any mitigation beyond general compliance.

Therefore, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

b) Would the project create significant hazard to the public or the environment through reasonably foreseeable upset and accidental conditions involving the release of hazardous materials into the environment?

Potentially Significant Impact Unless Mitigation Incorporated. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project utilizes hazardous materials as part of its routine operations and could potentially pose a hazard to nearby sensitive receptors under accident or upset conditions.

The site is operated as Union Central Cold Storage has been used for cold storage and other commercial/industrial purposes since the early 1900s. The subject property is developed with twelve (12) adjacent structures, supported by loading docks and a surface parking lot. The northeastern portion of the site is undeveloped land.

BAS conducted the Phase I ESA Project Site in January 2013 The purpose of the Phase I ESA was to gather information about the subject site and surrounding areas to identify conditions indicative of releases or threatened releases of hazardous substances, pollutants and contaminants, petroleum or petroleum products, and controlled substances. As reported in the Phase I ESA, the Project Site is surrounded primarily by commercial and light industrial/manufacturing properties. The closest live/work properties include loft-style units located approximately one block east of the Project Site, on Mateo Street, and about one block north, on 6th Street.

As part of the Phase I ESA, BAS conducted an inspection of the site and noted the following environmental concerns:

- Strong ammonia odor was noted within certain portions of the site, mostly wherever refrigeration equipment is located.
- Improper waste storage and handling were noted throughout loading concourse, machine shop, garage and equipment room areas.
- Oil staining was noted in several areas throughout the site, mostly associated with equipment and waste oil storage.
- Evidence of unauthorized dumping was observed in the undeveloped northeastern portion of the site.

However, BAS concluded that these concerns/conditions can be reasonably addressed and managed as part of the property redevelopment, as long as proper planning is implemented.

Soil sampling performed as part of the ESA identified only minor heavy-end petroleum detections in two

(out of eleven) samples, including one collected at the location of the encountered unknown underground feature. Therefore, impacts associated with the above-discussed poor waste management practices and oil staining are expected to be relatively minor and limited to shallow soil only. No SVOCs were detected in any of the analyzed soil samples, aside from traces of dimethyl phthalate, which is not a regulated substance. Metal concentrations generally appear to be representative of background conditions, and all were below applicable hazardous waste standards. Based on this data, it is unlikely that significant soil segregation and excavation will be required as part of site grading; however, removal of isolated impacted areas may be necessary. Similarly, further assessment and removal of the unknown underground feature will also be necessary, as part of site redevelopment.

Based on conducted soil sampling, localized impacts cannot be ruled out; however, any further testing for such potential impacts at this time is not practical, while the site is mostly built-up. Similarly, although an unknown underground feature, and associated petroleum-impacted soil and water were encountered, any further investigation of this finding is impractical at this time due to its location. The thick, reinforced concrete base and configuration of the loading dock, located immediately adjacent to the office building and Industrial Street, do not allow for development of a comprehensive assessment plan for the encountered feature. The proposed site redevelopment is anticipated to include significant site grading; the feature could be more effectively exposed, assessed and removed from the site as part of that process. Nonetheless, for the purposes of planning, the underground feature should be assumed to be an underground storage tank (UST), which would require involvement of LAFD for permitting and removal. Should it be discovered that the feature is not a tank, its removal would require less time and effort.

Potential impacts associated with various site and REC's identified above would be mitigated to a less than significant level provided that the recommendations specified in the Phase 1 ESA are included in the design and construction of the Proposed Project to the satisfaction of the Department of Building and Safety, and with the incorporation of the following Mitigation Measure 8-1, below, and RCM 6-2, above, which requires compliance with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Proposed Project, and as it may be subsequently amended or modified.

The Project Site is located within the City of Los Angeles Methane Buffer Zone based on the City of Los Angeles Department of City Planning, Zone Information and Map Access System. Tetra Tech BAS (BAS) completed a subsurface methane gas investigation on the Project Site on December 18, 2012 (see report). As noted in their investigation, the Project Site is within the limits of a "Methane Buffer Zone" as designated by LADBS. Based upon the measured methane levels and the corresponding soil gas pressures, BAS concluded that no measurable methane concentrations were found during the soil gas survey, with exception of location P-5 (See Figure 2, Testing Locations Map, in Methane Site Test report), where petroleum-impacted soil and water was encountered and the initial methane concentration measurement was correspondingly elevated. The encountered petroleum impacts appear to be contained in old equipment or debris, which are going to be further investigated and removed during site redevelopment. Subsequent measurement revealed substantially decreased methane concentration. Based on the observation of localized petroleum impacts and rapid decrease in methane concentrations, the measured methane levels are not considered to be representative of site-wide subsurface conditions, and therefore, should not be

included in consideration for any methane mitigation system for the site. Accordingly, potential impacts resulting in accidental risk of upset will be less than significant.

Mitigation Measure

8-1 **Hazardous Materials Site.** The Applicant shall comply with the following recommendations as specified in the Phase I Environmental Site Assessment (ESA) in the design and construction of the Industrial Street Lofts Project to the satisfaction of the Department of Building and Safety:

- Based on the results of the ESA no further inquiry and/or investigation of the subject property is considered practical at this time, and thus none are recommended. However, the Applicant should be aware that isolated pockets of impacted subsurface soil may be encountered during construction and, if encountered, are likely to affect the construction schedule for the planned development. In addition, the unknown underground feature, encountered by BAS, will require further assessment and removal. Should this feature be confirmed to be an underground storage tank, a specialized contractor shall be retained to handle the decommissioning and removal of the tank and associated impacted soil, if any, to the satisfaction of the Los Angeles Fire Department.
- In the event that the current owners leave the facility "as is" (i.e., all existing equipment, chemicals, debris, waste, etc., will remain at the site and thereby become the property of Camden upon taking possession of the property), the applicant shall retain the services of a qualified demolition contractor, experienced in handling items, which may contain regulated substances and thus require proper draining/ containerization and subsequent disposal/recycling.
- Should existing engineered fill under Freezer #5 be re-used at the site (based on geotechnical recommendations), the fill soil shall be tested in order to assess whether it meets the residential land use criteria.
- A construction contingency plan for dealing with both anticipated and potential occurrences of environmentally sensitive situations during site redevelopment shall be established and adhered to during construction.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect may occur if the Project Site is located within 0.25-mile of an existing or proposed school site, and is projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds. The closest school sites to the Project Site include the Para Los Ninos Eisner Foundation Early Education Center @ FLC located 250 feet to the east at 1617 7th Street and the Metropolitan High School located 850 feet to the southeast at 727 Wilson Street. No hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would be present at the Project Site, and use of these substances would comply with State Health Codes and Regulations. Furthermore, the proposed haul route would extend from the Project Site to the nearest freeway onramp to the 10 Freeway and would not pass by either of the schools identified above.

Therefore, the Proposed Project would not create a significant hazard through hazardous emissions or the handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school and a less than significant impact would occur.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Potentially Significant Impact Unless Mitigation Incorporated. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if the Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

The Project Site is not identified as being currently evaluated by the State of California, local, or federal government for remedial action under CERCLA or any other environmental regulations. Furthermore, review of available public information did not identify any potential concerns with regard to off-site properties.

On January 8, 2013, BAS requested a records search of multiple federal, state, and local environmental databases from GeoSearch. A total of 77 databases were searched using radii specified in ASTM E1527-05. Searched databases included federal, state and local (Los Angeles County) databases, prescribed by the ASTM Standard; as well as several supplemental federal and state databases. These searches identified 111 "locatable" (i.e., mappable or geo-coded) and five (5) "unlocatable" listings, i.e., those that cannot be shown on the map due to missing or incorrect address information. Review of unmappable listings did not reveal any that may be of potential concern for the Project Site. In addition, only four sites, located in close proximity and upgradient to the Project Site, with respect to groundwater direction, were identified by the search of governmental databases. After reviewing available public information, BAS did not identify any potential concerns with regard to off-site properties.

Overall, potential impacts associated the potential of the Industrial Street Project creating a significant hazard to the public would be mitigated to a less than significant level provided that the recommendations specified in the Phase 1 ESA are included in the design and construction of the Proposed Project to the satisfaction of the Department of Building and Safety, and with the incorporation of the Mitigation Measure 8-1 and RCM 6-2, above, which requires compliance with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Proposed Project, and as it may be subsequently amended or modified.

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

No Impact. A significant project-related impact may occur if a project were placed within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard. The nearest airport to the Project Site is the El Monte Airport, located approximately 14.1 miles east of the Site. The Santa Monica Municipal Airport is next closest at roughly 16.9 miles from the Project Site. Further, the Project Site is not located within a public airport land use plan. Furthermore, the Project Site is not in an airport hazard area. Therefore, the Proposed would not result in a safety hazard for people residing or working in the Project area, and impacts would be less than significant.

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. This question would apply to the Proposed Project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. There are no private airstrips in the vicinity of the Project Site, and as such, no impacts would occur.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact to hazards and hazardous materials if the project involved possible interference with an emergency response plan or emergency evacuation plan. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the degree to which the project may require a new, or interfere with an existing emergency response or evacuation plan, and the severity of the consequences.

The Proposed Project is not located on or near an adopted emergency response or evacuation plan.[20] Development of the Project Site may require temporary and/or partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns impede public access or travel upon public rights-of-way. As discussed below under Transportation and Traffic, the Project would not create significant impacts at any of the study intersections during the morning and afternoon peak hours. Therefore, the Proposed Project's impacts to area traffic would have no significant impacts on nearby roadways or intersections, and would not interfere with an emergency response or evacuation plan. Therefore, the Proposed Project's impacts related to interference with any adopted emergency response plan or emergency evacuation plan would be less than significant.

h) Would the project 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

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[20] *City of Los Angeles Safety Element Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, April 1995.*

residences are intermixed with wildlands?

No Impact. A significant impact may occur if a project is located in proximity to wildlands areas and would pose a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is located in a highly urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or significant vegetation. The Project Site is not located in a Very High Fire Hazard Severity Zone, Mountain Fire District, or Fire Buffer Zone.[21] Therefore, no impacts from wildland fires would occur.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed in combination with the related projects has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City of Los Angeles. However, the potential impacts associated with the Project would be less than significant and, therefore, not cumulatively considerable. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of those properties. The closest related project is located approximately 0.5 miles from the nearest Project Site and is not sufficiently close enough to the Project Sites to generate cumulative impacts with respect to hazardous materials. Further, local municipalities are required to follow local, state, and federal laws regarding hazardous materials, which would further reduce impacts associated with related projects. Therefore, with compliance with local, state and federal laws pertaining to hazardous materials, the Proposed Project in conjunction with related projects would be expected to result in less-than-significant cumulative impacts with respect to hazardous materials.

9. HYDROLOGY AND WATER QUALITY

a) Would the project violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if the project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

The City of Los Angeles has adopted the regulatory requirements set forth in the SUSMP of the Los Angeles Regional Water Quality Control Board (LARWQCB) under the City of Los Angeles Ordinance No.

[21] *City of Los Angeles Department of Planning, Zone Information and Map Access System, website: http://zimas.lacity.org/, accessed June 2013.*

173,494. BMPs typically include controlling roadway and parking lot contaminants by installing oil and grease separators at storm drain inlets; cleaning parking lots on a regular basis; incorporating peak-flow reduction and infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping; and implementing education programs.

The SUSMP identifies the types and sizes of private development projects that are subject to its requirements. As the Project proposes a live/work development of 10 or more dwelling units, it is subject to the requirements of the SUSMP. Requirements of the SUSMP are enforced through the City's plan approval and permit process.

Construction Impacts

Three general sources of potential short-term, construction-related stormwater pollution associated with the Proposed Project include: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment. As required under the NPDES, the Project Applicant is responsible for preparing a SWPPP to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. The primary objectives of the NPDES stormwater program requirements are to: 1) effectively prohibit non-stormwater discharges, and 2) reduce the discharge of pollutants from stormwater conveyance systems to the Maximum Extent Practicable ("MEP" statutory standard). The SWPPP would incorporate the required implementation of BMPs for erosion control and other measures to meet the NPDES requirements for stormwater quality. Implementation of the BMPs identified in the SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. Implementation of the following mitigation measures would ensure that the Proposed Project's construction-related water quality impacts would be less than significant.

Further, the Applicant would be required to obtain coverage under the General Construction Activity Storm Water Permit (GCASP), which requires development and implementation of a SWPPP.[22]

In addition, construction projects that include grading activities during the rainy season must also develop a Wet Weather Erosion Control Plan (WWECP). The Project will comply with LAMC Chapter IX, Division 70, which addresses grading, excavations, and fills. Compliance with the LAMC would ensure that construction would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. Therefore, construction impacts related to water quality would be less than significant.

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[22] *California Environmental Protection Agency, State Water Resources Control Board, Storm Water Program, Construction Storm Water Program, website: http://www.swrcb.ca.gov/water_issues/programs/stormwater/construction.shtml, accessed September5, 2013.*

Operational Impacts

Stormwater runoff from the Project Site is currently collected by either roof drains and discharged to curb face, or sheet flows into the adjacent streets. Both Alameda Street and Mill Street flow southerly to catch basins located just north of the Industrial Street intersection. Industrial Street flows from west to east. Since the Project Site is currently comprised of nearly 100 percent impervious surfaces, no additional stormwater runoff is anticipated. Additionally, irrigation and other runoffs are anticipated to be minimal. Based on the availability of a nearby storm drain and no increase in runoff from the Project Site (beyond that produced by the previous development), Project impacts with respect to the volume of stormwater runoff would be less than significant.

In addition, irrigation and other runoffs are anticipated to be potential impacts to surface water quality from runoff would be mitigated to a level of less than significance by incorporating stormwater pollution control measures. The Proposed Project will be required to demonstrate compliance with Low Impact Development Ordinance ("LID Ordinance") standards and retain or treat the first ¾ inch of rainfall in a 24-hour period. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. City of Los Angeles Ordinance No. 172,176 and Ordinance No. 173,494 specify Stormwater and Urban Runoff Pollution Control which require the application of BMPs. Chapter IX, Division 70 of the LAMC addresses grading, excavations, and fills. The Proposed Project would also comply with water quality standards and wastewater discharge requirements set forth by the SUSMP for Los Angeles County and Cities in Los Angeles County and approved by the LARWQCB. Full compliance with the SUSMP and implementation of design-related BMPs, including the applicable requirements in the mitigation measures below, would ensure that the operation of the Proposed Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Therefore, operational water quality impacts would be less than significant.

b) Would the project 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)?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on groundwater level if it would change potable water levels sufficiently to: (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity. As discussed in Section 8(a) the Project Site is 100 percent impervious. As such, 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site.

According to the Geotechnical Report, groundwater was not encountered to a depth of 70 feet bgs. Review of the Seismic Hazard Zone Report for the Los Angeles Quadrangle (CDMG, 2006) indicates that the

historical high groundwater level is greater than 100 feet bgs at the Project Site. The Proposed Project would excavate soils beneath the Project Site for subgrade preparation to a depth of only 8 feet, and would not impact the groundwater table. Thus, construction of the Proposed Project would not deplete groundwater supplies or interfere substantially with groundwater recharge and no impact would occur.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow that would result in a substantial increase in erosion or siltation during construction or operation of the project. The Project Site is located in a highly urbanized area of Los Angeles, and no streams or river courses are located on or within the Project vicinity.

Implementation of the Proposed Project would not increase site runoff or result any changes in the local drainage patterns, as the site is currently 100 percent impervious. Implementation of the SWPPP and LID requirements, however, would reduce the amount of surface water runoff after storm events, as the Proposed Project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾ inch of rainfall in a 24-hour period. Therefore, impacts associated with surface water hydrology, erosion, or siltation on- or off-site would be less than significant.

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

Less than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact if it results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the Project Site or nearby properties. The Project Site is located in a highly urbanized area of Los Angeles, and no streams or watercourses are located on or within the Project vicinity. The Project Site is 100 percent impervious. The Proposed Project would not result in a significant increase in site runoff or any changes in the local drainage patterns. Therefore, the Proposed Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site and no impact would occur.

e) Would the project 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?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the CWC or that

cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the volume of stormwater runoff from the Project Site were to increase to a level which exceeds the capacity of the storm drain system serving the Project Site. A Project-related significant adverse effect would also occur if the Proposed Project would substantially increase the probability that polluted runoff would reach the storm drain system.

There are 16-inch storm drains within Alameda Street and Mill Street, along the property frontage. There is a catch basin adjacent the Project Site on the northeast corner of Alameda Street at Industrial Street. This catch basin connects to the storm drain in Alameda via a 12-inch pipe. Potential widening of Alameda Street may result in the removal and reconstruction of the catch basin and extension of the associated 12-inch outlet pipe.

Urban runoff discharged from municipal storm drains is one of the principal causes of water quality problems in most urban areas. Oil and grease from parking lots, pesticides, cleaning solvents, and other toxic chemicals can contaminate stormwater, which can then contaminate receiving waters downstream and, eventually, the Pacific Ocean. As discussed in the response to Question 9(a), the Project is required to comply with the NPDES program as well as the requirements set forth in the LAMC. These regulations control water pollution by regulating point sources that discharge pollutants, and are further described under *Construction* and *Operation*, below.

Construction Impacts

Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth-moving activities which, when not controlled, may generate soil erosion and the transportation of pollutants via storm runoff or mechanical equipment.

Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. The same types of common sense, "good housekeeping" procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

Poorly maintained vehicles and heavy equipment leaking fuel, oil, or other fluids onto the construction site are also common sources of stormwater pollution and soil contamination. Earth-moving activities that can greatly increase erosion processes are another source of stormwater pollution contamination. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants.

These BMPs are formally described as Regulatory Compliance Measures RCM 9-1 and RCM 9-2. When properly designed and implemented, these "good-housekeeping" practices would further reduce the already less than significant short-term construction-related impacts by controlling dust and erosion that may occur

on-site and leaks from any construction equipment. Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits.

Regulatory Compliance Measures

RCM 9-1 Stormwater Pollution (Demolition, Grading, and Construction Activities)

Sediment carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life.

- Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.
- All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.
- Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible.
- Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting.

RCM 9-2 Prior to the issuance of a grading permit, the Project shall comply with the SUSMP and/or the Site Specific Mitigation Plan to mitigate stormwater pollution as required by Ordinance Nos. 172,176 and 173,494. The appropriate design and application of BMP devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works.

Operational Impacts

Runoff from the Project Site currently is and would continue to be collected on the Project Site and directed towards existing storm drains in the Project vicinity that have adequate capacity. Activities associated with operation of the Project would generate substances that could degrade the quality of water runoff. The deposit of certain chemicals by cars parked in driveways or on the streets within the Project Site could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system.

However, pursuant to local practice and City policy stormwater retention will be required as part of the LID Ordinance/SUSMP implementation features (despite no increased imperviousness of the Project Site). Further, any pollutants from the parking areas would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance requirements. Accordingly, the Proposed Project will be required to demonstrate compliance with LID Ordinance standards and retain or treat the first ¾ inch of rainfall in a 24-hour period, which will reduce the Proposed Project's impact to the stormwater infrastructure.

Therefore, Proposed Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff and potential impacts to surface water quality would be less than significant.

f) Would the project otherwise substantially degrade water quality?

Less Than Significant Impact. A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. The Proposed Project does not include potential sources of contaminants, which could potentially degrade water quality and would comply with all federal, state and local regulations governing stormwater discharge. Therefore, impacts to water quality would be less than significant.

g) Would the project 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. A significant impact may occur if the Proposed Project were to place housing within a 100-year flood hazard area. A 100-year flood is defined as a flood which results from a severe rainstorm with a probability of occurring approximately once every 100 years. According to the Federal Emergency Management Agency (FEMA) flood insurance rate map for the Project Area, the Project Site is not located within a designated flood zone. Therefore, the Proposed Project would not place housing within a 100-year flood hazard area and no impact would occur.

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. A significant impact may occur if the Project was located within a 100-year flood zone, which would impede or redirect flood flows. The Project Site is not in an area designated as a 100-year flood hazard area. The Project Site is located in a highly urbanized area and, as no changes to the local drainage pattern would occur with implementation of the Proposed Project, the Proposed Project would not have the potential to impede or redirect floodwater flows and no impact would occur.

i) Would the project 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?

No Impact. A significant impact may occur if the Proposed Project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam. Based on a review of the County of Los Angeles Flood and Inundation Hazards Map, it is concluded that the Project Site does not lie within a mapped inundation area.[23] Moreover, the area surrounding the Project Site is highly urbanized and there are no levees or dams within the immediate vicinity of the Project Site. Thus, the Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including

[23] *Los Angeles County Department of Public Works, FEMA Flood Zone Determination Website www.dwp.lacounty.gov.wmd.floodzone/index.cfm, accessed May, 2014.*

flooding as a result of the failure of a levee or dam and no impact would occur.

j) Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

No Impact. A significant impact would occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami), or if a project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. Seiches are large waves generated in very large enclosed bodies of water or partially enclosed arms of the sea in response to ground shaking. Tsunamis are waves generated in large bodies of water by fault displacement or major ground movement. Based on the lack of such large enclosed water bodies nearby, the Proposed Project Site is not located in a potential seiche or tsunami zone and no impacts would occur. With respect to the potential impact from a mudflow, the Project Site and surrounding area are relatively flat and the Project Site is surrounded by urban development; therefore, it does not contain any sources of mudflow. Additionally, there are no major hills or steep slopes in the Project vicinity. Therefore, the Proposed Project would not expose people or structures to significant risk involving seiche, tsunami, or mudflow, and no impact would occur.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in combination with the related projects would result in the further infilling of uses in an already dense urbanized area. As discussed above, the Project Site and the surrounding area is served by the existing City storm drain system. Runoff from the development sites and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Project Site or the related project sites, since this part of the City is already fully developed with impervious surfaces.

The Proposed Project and each related project would be required to implement a SWPPP and/or SUSMP. Under the requirements of the LID Ordinance, each related project will be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾ inch of rainfall in a 24-hour period. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Project would not make a cumulative contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. Therefore, cumulative water quality impacts would be less than significant.

10. LAND USE AND PLANNING

a) Would the project physically divide an established community?

Less Than Significant Impact. A significant impact may occur if a project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (b) the extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and (c) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of a project

The Project Site is located within an urbanized area within the Central City North Community Plan Area (CCNCPA). The Project Site is located within a predominately industrially zoned area. It is currently zoned M3-1 and has a General Plan Land Use Designation of Heavy Manufacturing per the Community Plan. Per the City's Zoning Code, residential uses are not permitted in industrial zones; however the Central City North Community Plan designates an area—generally bound by First Street to Violet and Alameda Street to the Los Angeles River as the AIR District and permits adaptive reuse of obsolete industrial buildings to live/work units for artists and artisans. Conversion of such buildings to live/work units is discretionary and requires a determination of the Zoning Administrator (known as a ZAD), per L.A.M.C. Section 12.24.X.13. As a result of policy changes in the 2000 Central City North Community Plan that encouraged adaptive reuse live/work units in the area, a thriving community of artist, entrepreneurs, and people working in creative industries has developed. Given the changing nature of the area and changes in workplace trends, the City has recently adopted an ordinance creating a new HI (Hybrid Industrial) zone that allows new construction of live/work units when such projects also provide a minimum amount of affordable housing and comply with a number of other public benefit requirements found in the adopted HI Zone Ordinance. This indicates a new policy direction to allow compatible new live/work construction in areas that are currently industrially zoned.

The Project vicinity is primarily developed with old warehouses, some of which have been converted to artist's lofts and studios. As a result, there are several live/work developments within a few blocks of the Project Site to the east. Although the Proposed Project is not consistent with the existing M3 zoning designation, the Project is seeking a zone change to C2-2D-RIO, which supports the growing and maturing live/work community in the Project vicinity. As proposed, the Proposed Project would not divide an established community as the existing pattern of development in the Project area includes a mix of industrial, manufacturing, and live/work land uses.

The applicant is seeking a General Plan Amendment to the Community Commercial General Plan Land Use Designation and zone change to the C2-2D-RIO Zone. Although the Proposed Project is seeking a zone change to the C2-2D-RIO Zone, it should be noted that the Proposed Project was designed to comply with the provisions of the newly adopted HI Zone Ordinance, with respect to the uses, urban design, and development requirements of the zone, which are being established to ensure compatibility between existing and proposed development and which continue to promote the area as a jobs-producing area by

accommodating the workplace and space needs of contemporary workers engaged in creative and technology industries, among others. Accordingly, the Proposed Project would not disrupt or divide the physical arrangement of the established community, and land use impacts would be less than significant.

b) Would the project 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 Unless Mitigated. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the project site, and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate.

The Project Site is located within the jurisdiction of the City of Los Angeles, and is therefore subject to the designations and regulations of several local and regional land use and zoning plans. At the regional level, the Project Site is located within the planning area of the SCAG, the Southern California region's federally-designated metropolitan planning organization. The Proposed Project is also located within the South Coast Air Basin and, therefore, is within the jurisdiction of the SCAQMD. At the local level, development of the Project Site is guided by the General Plan of the City of Los Angeles, the Central City North Community Plan, and the LAMC, which are intended to guide local land use decisions and development patterns.

Regional Plans

SCAQMD Air Quality Management Plan

In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The SCAQMD's AQMP was updated in 2012 to establish a comprehensive air pollution control program leading to the attainment of state and federal air quality standards in the Basin, which is a non-attainment area. As discussed above in Section 3, Air Quality, above, the Proposed Project would not exceed the daily emission thresholds during the construction or operational phases of the Project. Therefore, the Project would be consistent with the AQMP.

SCAG Regional Comprehensive Plan

The Project Site is located within the six-county region that comprises the SCAG planning area. The SCAG Regional Comprehensive Plan (RCP) includes growth management policies that strive to improve the standard of living, maintain the regional quality of life, and provide social, political, and cultural equity. The Proposed Project would be consistent with policies set forth in the RCP, as the Proposed Project would redevelop a site that is currently occupied by an industrial building, loading dock, and freight truck and trailer storage area, with a live/work development with project-serving retail uses, thereby maximizing its location within the City's urban core, supported by infrastructure, and that is least likely to cause an adverse environmental impact. Furthermore, as the Proposed Project would add approximately 344 live/work units

in the Downtown area, generating as many as 606 new residents, the Proposed Project would be consistent with SCAG growth projections.

Local Plans

City of Los Angeles General Plan

The General Plan is a comprehensive, long-range declaration of purposes, policies and programs for the development of the City. The General Plan is a dynamic document consisting of 11 elements, 10 Citywide elements (Air Quality Element, Conservation Element, Historic Preservation and Cultural Resources Element, Housing Element, Infrastructure Systems Element, Noise Element, Open Space Element, Public Facilities and Services Element, Safety Element, and Transportation Element) and the Land Use Element, which is comprised of individual plans for each of the City's 35 Community Planning Areas.

Those elements that would be most applicable to the Proposed Project are the Housing Element, the Land Use Element, and the Transportation Element. Housing Element objectives with which the Proposed Project would conform to include: encouraging production and preservation of an adequate supply of rental and ownership housing to meet the identified needs of persons of all income levels and special needs; encouraging the location of housing, jobs, and services in mutual proximity; and accommodation of a diversity of uses that support the needs of the City's existing and future residents. Land Use and Transportation Element objectives with which the Proposed Project conforms include: focus of future growth of the City near transit-served areas; increase land use intensity in transit station areas; reduced reliance on the automobile; and creation of a pedestrian-oriented environment.

The Project is not currently consistent with the land use designation of Heavy Manufacturing as identified in the Central City North Community Plan, a portion of the Land Use element of the General Plan. The Proposed Project discretionary requests include a General Plan amendment to Community Commercial and a zone change to the C2-2D-RIO Zone. With approval of the requested General Plan Amendment and zone change for the Project Site, the Proposed Project would conform to the zoning and Central City North Community Plan. Moreover, as discussed below, the Proposed Project is consistent with applicable objectives outlined in the City of Los Angeles General Plan (General Plan).

Central City North Community Plan

The Project Site is located within the Central City North Community Plan (Community Plan) and, therefore, all development activity on-site is subject to the policies of Plan and the land use regulations of the zone and relevant provisions of the Zoning Code. The Community Plan goals and objectives include: retaining sufficient land for a variety of industrial uses with maximum employment opportunities, preserving industrial plan designations to maintain the industrial employment base of community residents and to increase it whenever possible, enhancing the positive characteristics of existing neighborhoods while providing a variety of housing opportunities with compatible new housing (including live/work); improving the function, design, and economic vitality of the commercial corridors, preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks, and appearance; maximizing the development opportunities of future transit systems

while minimizing any adverse impacts; and planning the remaining commercial and industrial development opportunity sites for needed job producing uses that will improve the economic and physical condition of the Central City North area.

As described in the Community Plan, the existing AIR District includes a number of former warehouses that have been converted to artists' live/work lofts and studios. The Community Plan encourages the continued and expanded development of a thriving artists-in-residence community in the plan.[24] The Proposed Project, which would provide a mixed-use live/work and commercial development, would conform to the goals, objectives, and land uses identified in the Community Plan and would essentially extend the current land use pattern of live/work uses to 7th Street to the south.

Additionally, the Proposed Project is located within an area identified on the Central City North Community Plan map as the Alameda East Redevelopment Study Area. A redevelopment plan was never adopted for the area and therefore offers no relevant planning policies.

River Improvement Overlay (RIO) District

The RIO 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 things.[25] Specifically, the RIO was established under the Los Angeles River Revitalization Master Plan that was adopted in May of 2007, which establishes a vision for the 32 miles of the Los Angeles River that are within the City boundaries. The standards of the RIO impact projects if, and when, a development elects to redevelop the property or undergo a major remodel of more than 50% of the buildings value. As such, the Proposed Project will need to obtain administrative clearance from the Department of City Planning illustrating compliance with the landscaping and design standards of the RIO. As currently proposed, the proposed landscaping along the exterior facades of the development would strictly comply with the design standards identified in the RIO.

LAMC and Community Plan Land Use Designation

The Community Plan General Plan Land Use Designation for the Project Site is Heavy Manufacturing and the zone is M3-1, which in general does not currently allow for residential land uses. The Proposed Project would be comprised of live/work units, restaurant uses, and creative office uses. As such, the Proposed Project would not be consistent with the current land use designation and zoning of the Project Site. Accordingly, as discussed in further detail above, the discretionary actions required for the Project include a General Plan Amendment to the "Community Commercial" land use designation and a zone change to the C2-2D-RIO Zone. Upon approval of the General Plan amendment and zone change for the Project Site, the Project would be consistent with the zoning and Community Plan's land use designation and the zoning.

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[24] *City of Los Angeles Department of City Planning, Central City North Community Plan, website: http://cityplanning.lacity.org/complan/pdf/ccncptxt.pdf, accessed June 2013.*

[25] *Zoning Information No. 2358 and City of Los Angeles Ordinance Nos. 183144 and 183145.*

Density

As noted above, the Project Site is zoned M3-1, which does not generally allow residential uses. The Project is seeking a zone change to the C2-2D Zone. The proposed D limitation would limit the FAR to 3:1. The Project would include up to 344 live/work units. The Project's density is approximately 132.8 dwelling units per acre. Residential uses within the C2 Zone are permitted to be developed under the R4 development standards, which has a minimum lot area requirement of 400 square feet per unit. The Project Site has a net lot area of 112,843 square feet[26] which yields an allowable density of 282 units. Pursuant to LAMC Section 12.22-A.25, the inclusion of 6% of the base density (17 units) as Very Low Income affordable housing units makes the project eligible for a by-right 22.5% density bonus, which increases the maximum allowed density from 282 to 344 units.[27] Thus, upon approval of the requested General Plan amendment and zone change, together with the density bonus, the Proposed Project will be consistent with the density under the applicable zoning of the Project Site.

Floor Area

The Project Site's current M3-1 designation indicates that the Project Site is located in Height District 1, which does not specify a building height limit, and limits the FAR on the Project Site to 1.5:1. The Applicant is seeking a Zone/Height District Change to C2-2D with the D limitation limiting the FAR to 3:1. The Proposed Project proposes 336,304 square feet of development, resulting in a FAR of 2.98:1.

Open Space

The Industrial Street Lofts Project would provide common open space and landscaping amenities in accordance with the LAMC. As summarized in Table II-3, Summary of Required and Proposed Open Space Areas, below, 35,725 square feet of common open space is required by Code. The Proposed Project would include 34,400 square feet of open space with approximately 26,041 square feet of open space on Lot 1 including 17,069 square feet of open space in three separate courtyards on the ground floor, 6,183 square feet of open space in the upper level terraces, 1,742 square feet of open space in a community fitness gym/yoga studio, and 1,020 square feet of common space in a community clubhouse. In addition, 8,359 square feet of open space is proposed to be publically accessible during daylight hours on the partial flag lot park area on a portion of the flag lot. Recreational amenities would include a swimming pool and barbeque area, a fitness gym/yoga studio, a dog run, and a community clubhouse.

The Proposed Project is seeking a 7% reduction in common open space pursuant to LAMC Section 12.21G.3. With approval of this entitlement request, the Proposed Project's common open space would be consistent with the LAMC.

Parking

The Proposed Project would provide live/work and retail parking partially screened at-grade and in two levels above grade and one level below grade. As shown in Table II-4, in Section II, Project Description,

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[26] *As the Project is seeking approval of a tract map, lot area is measured net of dedications.*

[27] *Although a 22.5% density bonus would allow up to 346 units, the Applicant is only seeking to develop 344 units.*

the Proposed Project would exceed the parking requirements under Option 1 of the LAMC Section 12.22-A25(d), which requires a minimum of 1 parking space for each dwelling unit with 0 to 1 bedrooms, 2 spaces for each dwelling unit with 2 to 3 bedrooms, and 2.5 spaces for each dwelling unit with 4 or more bedrooms. As the Proposed Project is located in an enterprise zone, the commercial parking requirement is two spaces per 1,000 square feet. The development proposed would require 59 commercial parking spaces and 344 live/work parking spaces, for a total of 403 parking spaces. The Proposed Project includes 536 parking spaces, including 477 live/work spaces and 59 commercial spaces. Thus, the Proposed Project would exceed the minimum applicable commercial and live/work parking requirements.

The Project would include 394 on-site bicycle parking pursuant to the standards and requirements of the City's Bicycle Ordinance (182,386, *effective March 13, 2013*). The 344 proposed live/work dwelling units would require 379 bicycle parking spaces, including 35 short-term and 344 long-term spaces. The commercial/restaurant spaces would require 14 bicycle parking spaces, including 6 short-term and 8-long term spaces. With approval of the discretionary actions identified in Section II, Project Description, the Project's impacts with respect to consistency with the LAMC and the Community Plan land use designation would be less than significant.

Exposure to Poor Ambient Air Quality

The future occupants of the Proposed Project may be exposed to poor air quality emissions from nearby industrial facilities, roadway emissions, and emissions from nearby rail road operations. Although a recent court ruling, *California Building Industry Association v. Bay Area Air Quality Management District* (S213478, December 17, 2015), found that CEQA requires an analysis of a project's effect on the environment and does not require an analysis of the impacts of the environment on a project, existing adopted goals, objectives, policies, and programs in the General Plan address land use compatibility with respect to the siting of new residential development and other sensitive land uses near freeways or other sources of airborne pollutants. Further, the California EPA and the California Air Resources Board recommendations regarding the siting of new sensitive land uses near freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities. Based on CARB's Air Quality and Land Use Handbook, CARB recommends avoiding siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard; within one mile of a rail yard, CARB's recommendation is to consider possible siting limitations and mitigation approaches. With respect to a project's proximity to freeways both CARB and the City of Los Angeles Planning Commission (ZI 2427) recommend avoiding siting sensitive land uses within 1,000 feet of a freeway. The Proposed Project is located approximately 1,700 feet away from the nearest railroad right-of-way corridor and approximately 3,200 feet away from the nearest freeway. Thus, the Project Site is consistent with the land use siting requirements of CARB and the City of Los Angeles relative to freeways and rail yard facilities. CARB also recommends avoiding siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week). The Project site is located within 1,000 feet of distribution facilities and several other SCAQMD permitted facilities that contribute to poor ambient air quality. With respect to characterizing the ambient air conditions relative to point sources throughout the Basin, the SCAQMD released the draft final report of the fourth round of its Basin-

wide Multiple Air Toxics Exposure Study (MATES IV) in April 2015. MATES IV estimated the cancer risk from TAC emissions throughout the Basin by conducting a monitoring program, an updated emissions inventory of TACs, and a modeling effort to characterize health risks in the Basin. MATES IV focused on carcinogenic risk from TACs, and did not estimate other health effects from particulate exposures.[28] Based on average measurements at ten fixed monitoring sites, the study estimated 70-year lifetime carcinogenic risk from TACs in the Basin to be approximately 320 to 480 per million at individual monitoring sites. Mobile sources (e.g., cars, trucks, trains, ships, aircraft, etc.) represented approximately 90 percent of the cancer risk with the remaining 10 percent attributing to toxics emitted from stationary sources, including industrial operations such as refineries and metal processing facilities. Approximately 68 percent of the overall cancer risk in the Basin was attributed to diesel particulate emissions. The population-weighted risk in MATES IV shows a 57 percent reduction in modeled air toxics risk compared to the risks in MATES III period (2005).

As part of MATES IV, the SCAQMD prepared an interactive map that shows estimates of cancer risks in the Basin from ambient levels of TACs based on the modeling effort to provide insight into relative risks. The map reports estimated cancer risks for discrete two-kilometer-by-two-kilometer grid cells. The cancer risk estimates reported there should not be interpreted as actual rates of disease in the exposed population, but rather as estimates of potential risk, based on a number of conservative assumptions. In general, MATES IV indicates that the highest cancer risks from TACs are found near shipping ports, goods movement sources, and near freeways and other transportation corridors.[29] According to the interactive map, the Project Site displays an estimated risk of approximately 1,854 risks per one million persons. The Central portion of Los Angeles falls in an estimated range of 500-800 risks per one million. Compared to previous studies of air toxics in the Basin, the MATES IV study found decreasing air toxics exposure from the analysis done in the MATES III time period.

Chapter 3 of MATES IV discusses the development of the Toxics Emissions Inventory. An emissions inventory of air pollutants and their sources is essential to identify the major contributors of air contaminants and to develop strategies to improve air quality. The toxic emissions inventory for MATES IV consists of four components: (1) point sources; (2) area sources; (3) on-road mobile sources; and (4) off-road (or other) mobile sources. Point source emissions are from facilities having one or more pieces of equipment registered and permitted with the SCAQMD with emissions above certain threshold levels. Chapter 4 of the MATES IV Study, Regional Modeling and Evaluation, discusses the use of regional air quality modeling to estimate community exposure to air toxics as a function of both time and geography due to known toxic emissions sources. This chapter provides figures of ambient concentrations of diesel $PM_{2.5}$, formaldehyde, benzenes, and other TACs illustrating the locations of these concentrations in the South Coast District. This MATES IV Study discloses the potential health risks to current and future residents. Because this Study provides ambient concentrations of TAC's and an inventory of toxics emissions, a Project Health Risk Assessment is not necessary since the MATES IV Study evaluates in depth the sources

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[28] *Mortality and other health effects form particulate exposure were conducted as part of the 2012 Air Quality Management Plan.*

[29] *MATES IV focuses on the carcinogenic risk from exposure to air toxics, and does not estimate mortality or other health effects from particulate exposures. Source: http://www.aqmd.gov/home/library/air-quality-data-studies/health-studies/mates-iv, accessed July 2016.*

of toxic emissions in the Project area for the SCAQMD.

The AQMD and the City Planning Commission continue to recommend that, prior to the approval of a project, the impacts of air pollutants on people who would live in a new project are addressed and appropriately mitigated to the extent feasible. Therefore, to avoid a potential land use incompatibility arising from the development of the Project in an area with industrial land uses, the following mitigation measure is recommended:

Mitigation Measure:

10-1 Land Use/ Planning

- An air filtration system shall be installed and maintained with filters meeting or exceeding the ASHRAE Standard 52.2 Minimum Efficiency Reporting Value (MERV) of 11, to the satisfaction of the Department of Building and Safety.

Therefore, impacts associated with the release of toxic air contaminants would be less than significant, and no significant impact on human health would occur.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. A project-related significant adverse effect could occur if the Project Site was located within an area governed by a habitat conservation plan or natural community conservation plan. As discussed in Section 4(f) above, no such plans presently exist which govern any portion of the Project Site. Further, the Project Site is located in an area which is already fully developed with commercial and industrial uses and is also within a heavily urbanized area of the City of Los Angeles. Therefore, the Proposed Project would not have the potential to cause such effects.

Cumulative Impacts

No Impact. Development of the Proposed Project in conjunction with the related projects would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. With regard to land use plans, regional and citywide projects under consideration would implement and support important local and regional planning goals and policies. Like the Proposed Project, each related project would be subject to a discretionary land use approval process, including CEQA review, and would incorporate any mitigation measures necessary to reduce potential land use impacts such that no significant impacts with regard to adopted land use plans would occur. Also, upon approval of the requested actions, development of the Proposed Project together with future forecasted growth would not be anticipated to conflict with the intent of the City General Plan, with other applicable land use plans, or with the LAMC regarding the future development of the Central City North community. Therefore, development of the Proposed Project together with the related projects would not be expected to result in cumulatively considerable impacts with respect to applicable land use plans and regulations.

With regard to physical land use, it should be noted that all of the related projects are subject to local zoning and land use designations for each of the related project sites. These requirements would regulate future land uses and provide development standards for such land uses that would further preclude potential land use compatibility impacts.

As the Proposed Project would not combine with the related projects to substantially or adversely change the existing relationship with offsite communities and would not disrupt, divide, or isolate existing communities, the Project, combined with the related projects, would not result in cumulatively considerable physical land use impacts.

11. MINERAL RESOURCES

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

No Impact. A significant impact may occur if a project site is located in an area used or available for extraction of a regionally-important mineral resource, or if the project development would convert an existing or future regionally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering: (a) whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone MRZ-2 zone or other known or potential mineral resource area, and (b) whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

The Project Site is not located within the Los Angeles Downtown Oil Field, a Mineral Resource Zone 2 (MRZ-2) Area, an Oil Drilling/Surface Mining Supplemental Use District, or an Oil Field/Drilling Area.[30] Furthermore, no oil wells exist or are known to have previously existed on or adjacent to the Project Site.[31] Should any future mineral resource be discovered on or near the Project Site, development of the Project would not preclude the mineral's extraction. Therefore, no impact associated with the loss of availability of a known mineral resource would occur.

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

No Impact. A significant impact may occur if a project is located in an area used or available for extraction of a regionally-important mineral resource, or if the development would convert an existing or future regionally-important mineral extraction use to another use, or if the development would affect access to a

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[30] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps, September 1996.*

[31] *State of California Department of Conservation, Division of Oil, Gas & Geothermal Resources, Online Mapping System, District 1, website: http://maps.conservation.ca.gov/doms/index.html, accessed October, 2013.*

site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located within a Mineral Resource Zone 2 (MRZ-2) Area.[32] Furthermore, the Project Site is not designated as a locally-important mineral resource recovery site delineated on the Los Angeles General Plan, a specific plan, or other land use plan. Therefore, no impact associated with the loss of availability of a known mineral resource would occur.

Cumulative Impacts

No Impact. As discussed above, the Proposed would have no impact on mineral resources. It is not known if any of the related projects would result in the loss of availability of known mineral resources. Each related project would be required to comply with the Los Angeles CEQA guidelines and execute required project site studies. Nevertheless, the Proposed Project would have no incremental contribution to the potential cumulative impact on mineral resources and would have no cumulative impact on mineral resources.

12. NOISE

Noise Background

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady "background" noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

L_{eq} – An L_{eq}, or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community

[32] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Areas Containing Significant Mineral Deposits in the City of Los Angeles, September 1996.*

impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

L_{max} – The maximum instantaneous noise level experienced during a given period of time.

L_{min} – The minimum instantaneous noise level experienced during a given period of time.

CNEL – The Community Noise Equivalent Level is a 24-hour average L_{eq} with a 5 dBA "weighting" during the hours of 7:00 P.M. to 10:00 P.M. and a 10 dBA "weighting" added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24 hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

It is widely accepted that in the community noise environment the average healthy ear can barely perceive CNEL noise level changes of 3 dBA. CNEL changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dBA CNEL increase is readily noticeable, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound.

Noise levels from a particular source generally decline as distance to the receptor increases. Other factors, such as the weather and reflecting on barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically "hard" locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically "soft" locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. In addition, noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures – generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces

noise levels by 5 to 10 dBA. The normal noise attenuation within residential structures with open windows is about 17 dBA, while the noise attenuation with closed windows is about 25 dBA.[33]

a) Would the project result in 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 Unless Mitigation Incorporated. A significant impact may occur if the Proposed Project would generate excess noise that would cause the ambient noise environment at the Project Site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). Implementation of the Proposed Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail below.

Construction Impacts

Construction-related noise impacts would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 dBA at a distance of 50 feet from the noise source. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment.

Construction of the Proposed Project would require the use of heavy equipment for demolition/site clearing, grading/excavation/site preparation, installation of utilities, paving, and building construction. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity.

The U.S. Environmental Protection Agency (EPA) has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of construction equipment and activities that would occur at the Project Site are presented in Table IV-10, Noise Range of Typical Construction Equipment, and Table IV-10, Typical Outdoor Construction Noise Levels, respectively, at a distance of 50 feet from the noise source (i.e., reference distance).

[33] *National Cooperative Highway Research Program Report 117, Highway Noise: A Design Guide for Highway Engineers, 1971.*

Table IV-10
Noise Range of Typical Construction Equipment

Construction Equipment	Noise Level in dBA L_{eq} at 50 Feet [a]
Front Loader	73-86
Trucks	82-95
Cranes (moveable)	75-88
Cranes (derrick)	86-89
Vibrator	68-82
Saws	72-82
Pneumatic Impact Equipment	83-88
Jackhammers	81-98
Pumps	68-72
Generators	71-83
Compressors	75-87
Concrete Mixers	75-88
Concrete Pumps	81-85
Back Hoe	73-95
Tractor	77-98
Scraper/Grader	80-93
Paver	85-88

[a] *Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.*

Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

Construction activities associated with the Proposed Project would generate noise. These activities include demolition, site preparation/grading, and the physical construction and finishing of the proposed structures. The noise levels shown in Table IV-11 represent composite noise levels associated with typical construction activities, which take into account both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction. As shown in Table IV-11, construction noise during the heavier initial periods of construction is presented as 86 dBA L_{eq} when measured at a reference distance of 50 feet from the center of construction activity.[34] These noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 84 dBA L_{eq} measured at 50 feet from the noise source to the receptor would reduce to 78 dBA L_{eq} at 100 feet from the source to the receptor, and reduce by another 6 dBA L_{eq} to 72 dBA L_{eq} at 200 feet from the source to the receptor.

[34] *Although the peak noise levels generated by certain construction equipment may be greater than 86 dBA at a distance of 50 feet, the equivalent noise level would be approximately 86 dBA L_{eq} (i.e., the equipment does not operate at the peak noise level over the entire duration).*

Table IV-11
Typical Outdoor Construction Noise Levels

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 60 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74

Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

Land uses on the properties surrounding the Project Site primarily include industrial/warehouse facilities, commercial/retail uses, an educational facility, and live/work uses. Among these land uses, the educational facility (Para Los Ninos) and the live/work residences to the east have been identified and depicted in Figure IV-1, Noise Monitoring and Sensitive Receptor Location Map. To identify the existing ambient noise levels at these nearby off-site sensitive receptors as well as the general vicinity of the Project Site and adjacent area, noise measurements were taken with a Larson Davis 824 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2001) - American National Standard Specification for Sound Level Meters. Additionally, this noise meter meets the requirement specified in LAMC Section 111.01(l) that the instruments be "Type S2A" standard instruments or better. This instrument was calibrated and operated according to the manufacturer's written specifications. At the measurement sites, the microphone was placed at a height of approximately five feet above grade. The measured noise levels are shown in Table IV-12, Existing Ambient Daytime Noise Levels in Project Site Vicinity. The noise measurement locations and the noise sensitive receptors are illustrated on Figure IV-1, Noise Monitoring and Sensitive Receptor Location Map.

During construction, ground clearing, grading, structural, and other noise-generating activities would occur at the Project Site between the hours of 7:00 a.m. and 9:00 p.m. in accordance with the City of Los Angeles Municipal Code (LAMC). Due to the use of construction equipment during the construction phase, the Proposed Project would expose surrounding off-site receptors to increased ambient exterior noise levels comparable to those listed above in Table IV-11 above. Table IV-13, Estimated Exterior Construction Noise at Nearest Sensitive Receptors, above, shows the estimated construction noise levels that would occur at the nearest sensitive uses during construction of the Proposed Project.



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Scale (Feet)

Figure IV-1
Noise Monitoring and
Sensitive Receptor Location Map

Table IV-12
Existing Ambient Daytime Noise Levels in Project Site Vicinity

No.	Location	Primary Noise Sources	Noise Level Statistics [a]		
			L_{eq}	L_{min}	L_{max}
1	Southeast corner of Alameda Street and 6th Street.	Traffic noise along Alameda Street and 6th Street; trucks parked and idling along 6th Street and loading areas.	73.1	56.7	85.2
2	Southwest corner of Mateo Street and 6th Street.	Traffic noise along 6th Street and Mateo Street and pedestrian activity.	71.1	58.4	83.2
3	Near the intersection of Conway Place and Mateo Street.	Traffic noise along Mateo Street, trucks parked and idling along Mateo Street.	72.0	56.0	87.7
4	Northwest corner of Mateo Street and 7th Street.	Traffic noise along Mateo Street and 7th Street and pedestrian activity.	75.0	59.9	87.4
5	Northeast corner of Alameda Street and 7th Street.	Traffic noise along Alameda Street and 7th Street and pedestrian activity.	73.8	64.9	82.7
6	East side of Alameda Street at the Project Site's western boundary, mid-block between 6th and 7th Streets.	Traffic noise along Alameda Street and trucks parked and idling along Industrial Street.	72.8	63.6	88.5
7	West side of Mill Street at the Project Site's eastern boundary.	Traffic noise along Mill Street, truck and parking lot activity on the lot immediately north of the Project Site.	65.2	58.0	77.1

[a] Noise measurements were taken on May 17, 2013 at each location for a duration of 15 minutes.
See Noise Monitoring Data Report for noise monitoring data sheets.

As shown in Table IV-13, the construction noise levels forecasted for the proposed construction work during each phase of development associated with the Proposed Project would not result in perceptible noise increases at the nearest sensitive receptors. Nevertheless, it should be noted that if any increase in noise levels does occur at off-site receptors during construction of the Proposed Project, it would be temporary in nature and would not generate continuously high noise levels, although occasional single-event disturbances from construction are possible. In addition, the construction noise during the heavier initial periods of construction (i.e., grading work) would typically be reduced in the later construction phases (i.e., interior building construction at the proposed buildings) as the physical structure of the proposed buildings would break the line-of-sight noise transmission from the construction area to the nearby sensitive receptors.

Table IV-13
Estimated Exterior Construction Noise at Nearest Sensitive Receptors

Sensitive Land Uses[a]	Distance to Project Site (feet)	Existing Monitored Daytime Ambient Noise Levels (dBA L_{eq})	Estimated Peak Construction Noise Levels (dBA L_{eq})	Noise Level Increase	Significant Impact
1. Educational Facility (Para Los Ninos)	250	73.8	72.0	None	No
2. Live/Work Units	280	72.0	71.0	None	No
3. Live/Work Units	430	75.0	67.3	None	No

[a] *See Figure IV-1, Noise Monitoring and Sensitive Receptor Location Map.*
Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006. It should be noted that the peak noise level increase at the nearby sensitive receptors during Project construction represents the highest composite noise level that would be generated periodically during a worst-case construction activity and does not represent continuous noise levels occurring throughout the construction day or period.

LAMC Section 41.40 regulates noise from demolition and construction activities. Exterior demolition and construction activities that generate noise are prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday and national holidays. Demolition and construction are prohibited on Sundays. The construction activities associated with the Proposed Project would comply with these LAMC requirements. In addition, pursuant to the City Noise Ordinance (LAMC Section 112.05), construction noise levels are exempt from the 75 dBA noise thresholds if all technically feasible noise attenuation measures are implemented. As discussed previously, typical construction noise levels associated with the Proposed Project could temporarily and periodically exceed 75 dBA at 50 feet from the Project Site. However, pursuant the City Noise Ordinance (LAMC Section 112.05), construction noise levels are exempt from the 75 dBA noise threshold if all technically feasible noise attenuation measures are implemented. In this case, the Applicant would implement all technically feasible noise attenuation measures, as set forth in the mitigation measures below. Therefore, temporary construction-related noise impacts are less than significant; however implementation of Mitigation Measure 12-1 is recommended.

Regulatory Compliance Measures

RCM 12-1 The Project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

RCM 12-2 The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be

reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

Mitigation Measure

MM 12-1 Increased Noise Levels (Demolition, Grading, and Construction Activities)

- Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday and national holidays.
- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices.
- Noise and groundborne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.
- Barriers such as, but not limited to, plywood structures or flexible sound control curtains extending eight feet in height shall be erected around the perimeter of the construction site to minimize the amount of noise during construction on the nearby noise-sensitive uses.

Operational Noise Impacts

Upon completion and operation of the Proposed Project, onsite operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed on the new structures. However, the noise levels generated by these equipment types are not anticipated to be substantially greater than those generated by the current HVAC equipment serving the existing buildings on the Project Site and in the Project vicinity. As such, the HVAC equipment associated with the Proposed Project would not represent a new source of noise in the Project Site vicinity. In addition, the operation of this and any other onsite stationary sources of noise would be required to comply with the LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Large ground-level HVAC systems typically generate noise levels between 50 and 65 dBA at 50 feet. Roof-top mounted equipment typically produces noise levels of up to approximately 56 dBA at 50 feet. The nearest sensitive land use would be the educational facility located approximately 250 feet away from the Project Site. This educational use would not experience an increase in ambient noise due to rooftop mounted HVAC systems. Therefore, stationary noise would result in a less than significant impact.

In order to ensure that onsite residences would not be adversely impacted by ambient urban noise levels, Mitigation Measure 12-2 shall be implemented to ensure that dwelling units associated with the Project would be constructed in accordance with Title 24 insulation standards of the California Code of Regulations for residential buildings, which serves to provide an acceptable interior noise environment for sensitive

uses. Furthermore, implementation of Mitigation Measure 12-2 would require that the Applicant submit evidence to the City's Department of Building and Safety of a means of sound insulation sufficient to mitigate interior noise levels below a CNEL of 45 dBA in any habitable room of the Proposed Project. With implementation of Mitigation Measure 12-2, impacts associated with interior noise levels at the proposed residences would be less than significant.

Operational noise from mobile sources (e.g., project-related traffic) is addressed in the response to Question 9.c below.

Mitigation Measure

12-2 Increased Noise Levels (Mixed-Use Development)

- Wall and floor-ceiling assemblies separating commercial tenant spaces, live/work units, and public places, shall have a Sound Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413.

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level. The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction Impacts

Construction activities for the Proposed Project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate through the ground and diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. The construction activities associated with the Proposed Project could have an adverse impact on both sensitive structures (i.e., building damage) and populations (i.e., annoyance).

In terms of construction-related impacts on buildings, the City of Los Angeles has not adopted policies or guidelines relative to groundborne vibration. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as both the City of Los Angeles and the County of Los Angeles do not have a significance threshold to assess vibration impacts during construction, the Federal Transit Administration (FTA) and California Department of Transportation's (Caltrans) adopted vibration standards for buildings which are used to evaluate potential impacts related to construction. Based on the FTA and Caltrans criteria, construction impacts relative to groundborne vibration would be considered significant if the following were to occur:[35]

- Project construction activities would cause a PPV groundborne vibration level to exceed 0.5 inches per second at any building that is constructed with reinforced-concrete, steel, or timber;
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.3 inches per second at any engineered concrete and masonry buildings;
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.2 inches per second at any non-engineered timber and masonry buildings; or
- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.20 inches per second at any historical building or building that is extremely susceptible to vibration damage.

Table IV-14, Vibration Source Levels for Construction Equipment, identifies various PPV velocity (in VdB) levels for the types of construction equipment that would operate at the Project Site during construction. As shown in Table IV-14, vibration velocities could range from 0.003 to 0.21 inch/sec PPV at 25 feet from the source activity, depending on the type of construction equipment in use.

There are no known vibration-sensitive structures within 25 feet of the Project Site. The two closest structures are existing warehouse buildings located to the north and east of the Lot 1 Site, respectively. The footprint of the warehouse building located directly north of the site is set back approximately 75 feet to the north of the Proposed Project's northern property line. The warehouse building located directly east of Lot 1 is set back approximately 35 feet from the boundary of Lot 1 and has a zero lot setback from Lot 2. As shown in Table IV-14 above, at distances greater than 25 feet from the Project Site boundary, construction related vibration levels would not exceed 0.089 PPV. The grading and building foundations

[35] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006; and California Department of Transportation, Transportation- and Construction –Induced Vibration Guidance Manual, June 2004.*

Table IV-14
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV (in/sec)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Vibrator Roller	0.210	0.074	0.056	0.040	0.026
Sonic Pile Driver	0.170	0.060	0.045	0.032	0.021
Large Bulldozer	0.089	0.031	0.024	0.017	0.011
Caisson Drilling	0.089	0.031	0.024	0.017	0.011
Loaded Trucks	0.076	0.027	0.020	0.015	0.010
Jackhammer	0.035	0.012	0.009	0.007	0.004
Small Bulldozer	0.003	0.001	0.000	0.000	0.000

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, 2006.

associated with a 1,500 square foot restaurant structure on Lot 2 would not involve heavy equipment or activities involving vibrator rollers, pile drivers, large bulldozers, or caisson drilling. As discussed above, the most restrictive threshold for building damage from vibration is 0.20 PPV. There are no historic buildings near the Project Site or any other buildings that are extremely susceptible to vibration damage. As maximum off-site vibration levels would not exceed 0.089 PPV, there is no potential for construction to result in vibration levels exceeding the most restrictive threshold of significance. As such, impacts with respect to building damage resulting from Project-generated vibration would be less than significant.

Operational Impacts

The Proposed Project is a mixed-use development and would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large commercial and industrial projects. Although groundborne vibration at the Project Site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, the proposed land uses at the Project Site would not result in the increased use of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, these trips would typically only occur once a week and would not be any different than those presently occurring in the vicinity of the Project Site. According to the FTA technical study "Federal Transit Administration: Transit Noise and Vibration Impacts Assessments," typical road traffic-induced vibration levels are unlikely to be perceptible by people. Specifically, the FTA study reports that "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Therefore, Project-related traffic vibration levels would not be perceptible by sensitive receptors. Thus, operational vibration impacts would be considered less than significant.

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

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if the Proposed Project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Proposed Project. As defined in the *L.A. CEQA Thresholds Guide*

threshold for operational noise impacts, a project would normally have a significant impact on noise levels from operations if the project causes the ambient noise level measured at the property line of affected uses that are shown in Table IV-15, Community Noise Exposure (CNEL), to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase. Thus, a significant impact would occur if noise levels associated with operation of the Proposed Project would increase the ambient noise levels by 3 dBA CNEL at homes where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. According to the *L.A. CEQA Thresholds Guide,* in order to achieve a 3 dBA CNEL increase in ambient noise from traffic, the volume on any given roadway would need to double. In addition to analyzing potential impacts in terms of CNEL, the analysis also addresses increases in on site noise sources per the provisions of the LAMC, which establishes an L_{eq} standard of 5 dBA over ambient conditions as constituting a LAMC violation.

Table IV-15
Community Noise Exposure (CNEL)

Land Use	Normally Acceptable[a]	Conditionally Acceptable[b]	Normally Unacceptable[c]	Clearly Unacceptable[d]
Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 75
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 75
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 70
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 75
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---

[a] *Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.*

[b] *Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.*

[c] *Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.*

[d] *Clearly Unacceptable: New construction or development should generally not be undertaken.*

Source: Office of Planning and Research, State of California Genera Plan Guidelines, October 2003 (in coordination with the California Department of Health Services); City of Los Angeles, General Plan Noise Element, adopted February 1999.

Operational Noise Impacts

Traffic Noise

During long-term operation of the Project, noise generated by the 2,282 new daily vehicle trips was modeled under the existing (2013) "No Project" scenario and "2017 With Project" scenario utilizing the FHWA TNM 2.5 model. As shown in Tables IV-16 and IV-17, the greatest Project-related noise increases would be along Alameda Street from 4th Street to 6th Street with a 1.1 dBA L_{eq} increase in ambient noise levels during the AM peak hour and 1.3 dBA L_{eq} during the PM peak hour. Mobile noise generated by the Proposed Project would not cause the ambient noise level measured at the property line of the affected uses to rise to the "normally unacceptable" or "clearly unacceptable" category or result in any 5-dBA or more increase in noise level. Vehicular noise would result in a less than significant impact.

Table IV-16
2017 Estimated AM Peak Hour Mobile Source Noise Levels

Roadway Segment	Estimated dBA, Leq		
	Existing (2013)	Existing Plus Project (2017)	Project Impact
Alameda Street			
Between 4th Street and 6th Street	69.3	70.4	1.1
Between 6th Street and 7th Street	69.7	70.5	0.9
Between 7th Street and 8th Street	69.7	70.4	0.8
7th Street			
Between Central Ave. and Alameda Street	68.1	68.6	0.5
Between Alameda Street and Mateo Street	67.7	68.5	0.8
6th Street			
Between Central Ave. and Alameda Street	68.3	69.2	0.9
Between Alameda Street and Mateo Street	68.4	69.3	0.9
Source: Parker Environmental Consultants, 2015.			

Table IV-17
2017 Estimated PM Peak Hour Mobile Source Noise Levels

Roadway Segment	Estimated dBA, Leq		
	Existing (2013)	Existing Plus Project (2017)	Project Impact
Alameda Street			
Between 4th Street and 6th Street	69.9	71.2	1.3
Between 6th Street and 7th Street	69.8	71.0	1.1
Between 7th Street and 8th Street	69.9	70.9	1.0
7th Street			
Between Central Ave. and Alameda Street	68.7	69.2	0.5
Between Alameda Street and Mateo Street	68.0	69.2	1.1
6th Street			
Between Central Ave. and Alameda Street	68.9	69.9	1.0
Between Alameda Street and Mateo Street	68.5	69.6	1.1
Source: Parker Environmental Consultants, 2015.			

Parking Noise

Noise would be generated by activities within the proposed subterranean parking garage associated with the Proposed Project. Sources of noise within the parking structure would include engines accelerating, doors slamming, car alarms, and people talking. Noise levels within the parking areas would fluctuate with

the amount of automobile and human activity. Noise levels would be highest in the early morning and evening when the largest number of people would enter and exit the Project Site. As is typical for mixed-use buildings, cars entering and exiting the structure at all hours of the day and night can become a nuisance to occupants of the building and adjacent buildings. As such, the Department of City Planning recommends the driveway ramps be constructed of noise-attenuating materials such as concrete surfaces. As the subterranean parking serving the mixed-use component of the Proposed Project would be almost entirely underground and enclosed, noise generated at these levels would likely be imperceptible at ground level locations on and adjacent to the Project Site. In addition, any parking noise that may be audible would be similar to the existing noise generated at the Project Site due to trucks idling, loading, and unloading. In addition, operational-related noise generated by motor driven vehicles within the Project Site is regulated under the LAMC. Specifically, with regard to motor driven vehicles, LAMC Section 114.02 prohibits the operation of any motor driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five decibels. With implementation of Mitigation Measure 12-3, noise impacts associated with the Proposed Project's subterranean parking garage would be reduced to ensure operational noise impacts are less than significant.

Mitigation Measure

12-3 Increased Noise Levels (Parking Structure Ramps)

- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.

Stationary Noise Sources

Operational noise impacts from stationary sources are discussed in the response to question 9.a above.

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

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if the Proposed Project were to result in a substantial temporary or periodic increase in ambient noise levels above existing ambient noise levels without the Proposed Project. As discussed above, impacts are expected to be less than significant for construction noise and vibration, and operational noise and vibration. The implementation of Mitigation Measures 12-1, 12-2 and 12-3 would ensure the Proposed Project would not result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity, and these impacts would be less than significant.

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

No Impact. A significant impact may occur if the Proposed Project were located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site. There are no airports within a two-mile radius of the Project Site, and the Project Site is not within any airport land use plan or airport hazard zone. The Proposed Project would not expose people to excessive noise levels associated with airport uses. No impact would occur.

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?

No Impact. This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The Project Site is not located in the vicinity of a private airstrip. As no such facilities are located in the vicinity of the Project Site, no impact would occur.

Cumulative Impacts

Less Than Significant Impact. Construction and operation activities for the Proposed Project would not result in cumulative noise impacts, as the nearest related projects are located over a quarter mile away on 7th Street. Due to the distance between the Project Site and the nearest related projects, and the intervening structures that block the line of site between construction sites, the noise sources from each construction site would not be cumulatively considerable. With respect to operational noise impacts, the 2017 Future Year noise impacts for the AM and PM peak hours (as shown in Table IV-16 and IV-17, above) address cumulative impacts as the traffic volumes for the future year include the project traffic volumes plus the traffic volumes of the related projects. Thus, as shown in the tables above, the Industrial Street Loft Project's cumulative contribution to ambient noise levels is considered less than significant.

13. POPULATION AND HOUSING

a) Would the project 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. A significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the project area that would otherwise not have occurred as rapidly or in as great a magnitude. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on population and housing growth shall be made considering: (a) the degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that

was not previously evaluated in the adopted Community Plan or General Plan; and (c) the extent to which growth would occur without implementation of the project.

In October 2008, SCAG approved and adopted the "2008 Regional Comprehensive Plan for the SCAG Region – Helping Communities Achieve A Sustainable Future" (2008 RCP). The 2008 RCP is a long-term comprehensive plan that provides a strategic vision for handling the region's land use, housing, economic, transportation, environmental, and overall quality-of-life needs. The 2008 RCP is intended to serve as an advisory document for local agencies in the SCAG region. The following vision statement and guiding principles are based on the region's adopted Compass Growth Vision Principles for Sustaining a Livable Region. These statements further articulate how the RCP can promote and sustain the region's mobility, livability, and prosperity for future generations.

RCP Vision

To foster a Southern California region that addresses future needs while recognizing the interrelationship between economic prosperity, natural resource sustainability, and quality of life. Through measured performance and tangible outcomes, the RCP serves as both a voluntary action plan with short-term guidance and strategic, long-term initiatives that are guided by the following Guiding Principles for sustaining a livable region.

RCP Guiding Principles

- *Improve mobility for all residents.* Improve the efficiency of the transportation system by strategically adding new travel choices to enhance system connectivity in concert with land use decisions and environmental objectives.

- *Foster livability in all communities.* Foster safe, healthy, walkable communities with diverse services, strong civic participation, affordable housing and equal distribution of environmental benefits.

- *Enable prosperity for all people.* Promote economic vitality and new economies by providing housing, education, and job training opportunities for all people.

- *Promote sustainability for future generations.* Promote a region where quality of life and economic prosperity for future generations are supported by the sustainable use of natural resources.

SCAG's Compass Growth Vision Strategy

SCAG's Compass Growth Vision, adopted in 2004, and incorporated into the 2008 RCP, encourages better relationships between housing, transportation, and employment. The Growth Vision is driven by four key principles: (1) Mobility – Getting where we want to go, (2) Livability – Creating positive communities, (3) Prosperity – Long-term health for the region, and (4) Sustainability – Preserving natural surroundings.

Additionally, the Compass Growth Vision incorporates a 2% Growth Strategy that will increase the region's mobility by:

- Putting new employment centers and new neighborhoods near major transit systems so that people can have transportation choices other than their cars.
- Designing safe, attractive transit centers and plazas that people enjoy using.
- Creating mini-communities around transit stations, with small businesses, urban housing and restaurants all within an easy walk.

On a policy level, the Proposed Project is consistent with the goals and strategies of the RCP and the Compass Growth Vision Strategy discussed above. With respect to regional growth forecasts, SCAG forecasts the City of Los Angeles Subregion will experience a population increase to 4.34 million persons by 2030. As shown in Table IV-18, SCAG Population/Households Forecast for the City of Los Angeles Subregion, below, the forecast from 2010 through 2030 envisions growth of 290,797 additional persons, yielding an approximate 6.7 percent growth rate.

Table IV-18
SCAG's 2008 RCP Growth Forecast for the City of Los Angeles Subregion

Projection Year	Population	Households	Person/Households
2010	4,057,484	1,386,658	2.92
2030	4,348,281	1,578,850	2.75
Net Change from 2010 to 2030			
No. of Population/Households	290,797	192,192	
Percent Change	6.7%	13.2%	
Source: SCAG, 2008 Regional Comprehensive Plan (RCP) Update, adopted May 8, 2008.			

Construction Impacts

Construction job opportunities created as a result of the Proposed Project are not expected to result in any substantial population growth in the Project area. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the timeframe in which their specific skills are needed to complete a particular phase of the construction process.

Additionally, the construction workers would likely be supplied from the region's labor pool. The unemployment rate for construction jobs was 11.3% as of March 2014.[36] Construction workers would not be likely to relocate their household as a consequence of working on the Project, and as such, significant housing or population impacts would not result from construction of the Project. Therefore, construction-related population growth impacts would be less than significant.

[36] *Bureau of Labor Statistics: http://www.bls.gov/iag/tgs/iag23.htm, accessed August, 2013.*

Operational Impacts

The Proposed Project would remove an industrial building and accessory uses and would replace them with a new live/work, creative office and commercial development. The Project would include 344 live/work units, 24,044 square feet of creative office space, and 5,500 square feet of restaurant space.

Population generation is shown in Table IV-19 and employee generation is shown in Table IV-20. It is estimated that the Project would generate approximately 606 residents and roughly 33 employees.

Based on the community's current household demographics (e.g., an average of 1.76 persons per household for the Study Area), the construction of up to 344 additional live/work dwelling units would result in an increase in up to approximately 606 net permanent residents in the City of Los Angeles.[37] The proposed increase in housing units and population would be consistent with the SCAG forecast of 192,192 additional households and approximately 290,797 persons in the City of Los Angeles between 2010 and 2030.

Localized Growth Forecasts

Table IV-18 shows the Southern California Association of Government's (SCAG) planned growth of the City of Los Angeles in population and housing to 2020.

The Proposed Project's 606 residents and 344 new live/work units would be well within SCAG estimates of growth for the City between 2008 and 2020. Therefore, the Proposed Project would result in a less than significant impact with respect to population, housing, and employment growth.

Additionally, the Proposed Project would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Proposed Project occupancy/buildout, and that would result in an adverse physical change in the environment; or introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan. Therefore, impacts related to infrastructure would be less than significant.

[37] *U.S Census Bureau. 2010 Census. Summary File 1. Tables P17, P18, P28, P29, P37, P38, and P39. Table QT-P11. Geography: Block Groups 1 & 2, Census Tract 2060.31, Los Angeles County, California.*

Table IV-19
Project Estimated Population Generation

Land Use	Quantity	Population Generation Rates	Total Population
Project			
Live/Work	344 live/work units	1.76 person / DU	606
		Total Increase in Population	**606**

Note: DU = dwelling unit
Source: U.S Census Bureau. 2010 Census.
Table: Parker Environmental Consultants, 2016.

Table IV-20
Project Estimated Employment Generation

Land Use	Size	Employee Generation Rates	Total Employees[1]
Existing Land Uses			
Industrial [a]	81,194 sf	781 sf / employee	104
Proposed Land Uses			
Creative Office [b]	24,044 sf	295 sf / employee	82
Restaurant [c]	5,500 sf	100 sf / employee	55
		Total Project Employees	**137**
		Less Existing Employees	**-104**
		Total Increase in Employees	**33**

Note: sf = square feet
[1] *Conservatively assumes that the project's live/work component will not generate any new employment.*
[a] *Existing industrial employee generation rate of 781 sf per employee is per the employee rates provided in ITE Trip Generation Manual.*
[b] *The number of creative office employees was based on approximately 1 employee per every 295 square feet of office area per the ITE Trip Generation Manual for general office uses.*
[c] *Number of employees was projected based on approximately 1 employee per every 100 square feet of restaurant area per the ITE Trip Generation Manual.*
Source: Parker Environmental Consultants, 2016.

b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Proposed Project would consist of the development of new housing and commercial land uses on a site that is currently occupied by an industrial building, loading dock, and freight truck and trailer storage area. No displacement of existing housing would occur with the development of the Proposed Project, and therefore, no impact would occur.

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if a project would result in the displacement of existing occupied housing units, necessitating the construction of replacement housing elsewhere. The Proposed Project would consist of the development of new housing and commercial land uses on a site that is currently occupied by an industrial building, loading dock, and freight truck and trailer storage area. No displacement of existing occupied housing would occur with development of the Proposed Project, and therefore, no impact would occur.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would introduce additional live/work, hotel, commercial/retail/restaurant, office, school, parking, and entertainment industry related uses to an already highly urbanized area of the City of Los Angeles. Any related projects that include residential live/work units could result in direct population growth in the City of Los Angeles, while other types of related projects could result in indirect population growth. None of the related projects would displace existing housing or residents. Development of related projects is expected to occur in accordance with adopted plans and regulations which aim to direct growth and development to urban centers that are close to existing employment centers and mass transit. The Proposed Project would not induce substantial population growth and would not displace housing or residents, and so its contribution to cumulative impacts to population and housing would be less than significant.

14. PUBLIC SERVICES

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

(i) Fire protection

Potentially Significant Impact Unless Mitigation Incorporated. Based on the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.09.07A, the maximum response distance between residential and commercial land uses and a LAFD fire station that houses an engine or Truck Company is 1.5 miles. If this distance is exceeded, all structures would be required to install automatic fire sprinkler systems.[38]

[38] *LAFD website: http://lafd.org/prevention/hydrants/division_9_fc.html, accessed September, 2014.*

The Proposed Project would include up to 344 live/work units, 24,044 square feet of creative office space, and 5,500 square feet of restaurant uses. The Proposed Project would generate up to approximately 606 permanent residents to the Arts District. Therefore, the Proposed Project could potentially increase the demand for LAFD services. The Project Site is served by LAFD Station No. 9 located at 430 East 7th Street, approximately 0.7 miles northwest of the Project Site. Station No. 9 is equipped with an Engine Company, Task Force, and Rescue Ambulance. Since the response distance does not exceed the 1.5-mile distance, fire protection response would be considered adequate, and impacts related to response distances would be less than significant.

Emergency vehicle access to the Project Site would continue to be provided from local and major roadways (i.e., Industrial Street, Alameda Street, and Mill Street). All circulation improvements proposed would be in compliance with the Fire Code, including any additional access requirements of the LAFD. Additionally, emergency access to the Project Site would be maintained at all times during both Project construction and operation. Therefore, impacts related to emergency access would be less than significant.

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The required fire flow necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Pursuant to LAMC Section 57.09.06, City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm is flowing. The overall fire flow requirement for the Proposed Project's mixed-use commercial/residential development is 4,000 gpm from four fire hydrants flowing simultaneously with a residual water pressure of 20 PSI. The adequacy of existing water pressure and availability in the Project area with respect to required fire flow would be confirmed by LAFD during the plan check review process. As part of the normal building permit process, the Proposed Project will be required to upgrade water service laterals, meters, and related devices as may be required to provide require fire flow; however, no new water facilities are anticipated. Additional fire hydrants may be required, depending on the building design and Fire Department requirements. Such improvements would be conducted as part of the Project either on-site or off-site within the right-of-way under the City's B-Permit process. Construction activities to install any new pipes or pumping infrastructure would be temporary and in short duration and would not result in any significant environmental impacts.

To ensure that fire protection services are adequate within the proposed buildings and around the Project Site, Mitigation Measure 14-1 and 14-2 have been provided. Implementation of Mitigation Measures 14-1 and 14-2 would further reduce the already less than significant impacts with respect to fire protection.

Mitigation Measures

14-1 The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features:

- Fire lanes, where required, shall be a minimum of 20 feet in width;
- All structures must be within 300 feet of an approved fire hydrant; and
- Entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

14-2 Prior to plan check review, the Project Applicant shall consult with the Los Angeles Fire Department regarding the installation of public and/or private fire hydrants, sprinklers, access, and/or other fire protection features within the Project. All required fire protection features shall be installed to the satisfaction of the Los Angeles Fire Department.

(ii) Police Protection

Potentially Significant Impact Unless Mitigation Incorporated. For the purpose of this analysis, a significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station, the construction of which may cause significant environmental impacts. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on police protection shall be made considering the following factors: (a) the population increase resulting from the project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for police services anticipated at the time of project buildout compared to the expected level of service available, considering, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and (c) whether the project includes security and/or design features that would reduce the demand for police services.

The Project Site is currently served by the City of Los Angeles Police Department's (LAPD) Central Bureau, which oversees LAPD operations in the Central, Hollenbeck, Newton, and Rampart areas. The Central Community Police Station, located at 251 East 6th Street, approximately 0.9 mile driving distance from the Project Site. The Central Community Police Station area is approximately 4.5 square miles and includes the communities of Chinatown, Little Tokyo, South Park, Central City East, Historic Core, Financial District, Artist Lofts, Olvera Street, Jewelry District, the Convention Center, and the Fashion District. The boundaries of Central Area are as follows: 110 Freeway to the north, Washington Boulevard and 7th Street to the south, Metrolink Railroad Tracks to the east, and 110 Freeway to the west. Table IV-21, Central City Police Station Crime Statistics, provides crime statistics for Central City area in the City of Los Angeles.

Table IV-21
Central City Police Station Crime Statistics

Crimes	2013 (Year to Date)[a]	2012	2011
Violent Crimes			
Homicide	3	1	6
Rape	9	13	16
Robbery	166	20	167
Aggravated Assault	137	186	162
Total Violent Crimes	**315**	**408**	**351**
Property Crimes			
Burglary	84	96	91
Motor Vehicle Theft	93	146	131
BTFV	310	397	408
Personal / Other Theft	646	744	601
Total Property Crimes	**1,133**	**1,383**	**1,231**
Total Part 1 Crimes	**1,448**	**1,791**	**1,582**
Child / Spousal Abuse (Part I & II)[b]	133	152	131
Shots Fired	10	11	9
Shooting Victims	4	2	5

Notes:
[a] *Crime Statistics for week ending June 1, 2013.*
[b] *Part II Child/Spousal Abuse Simple Assaults not included in Part 1 Aggravated Assaults above to comply with the FBI's Uniform Crime Reporting guidelines.*
Source: LAPD, COMPSTAT Unit, June 6, 2013.

Construction Impacts

Construction sites, if not properly managed, have the potential to attract criminal activity (such as trespassing, theft, and vandalism) and can become a distraction for local law enforcement from more pressing matters that require their attention. However, the Proposed Project would employ construction safety features including erecting temporary fencing around the construction site to discourage trespassers and deter any potential criminal activity (see Mitigation Measure 14-3, below). This mitigation measure would further reduce the already less than significant impacts to police protection services as a result of Project construction.

Operational Impacts

Operation of the Proposed Project would result in an increase of site visitors, residents, and employees within the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The Proposed Project would implement principles of the City of Los Angeles Crime Prevention through Environmental Design (CPTED) Guidelines. Specifically, the Proposed Project would include adequate and strategically positioned

functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. The building and layout design of the Proposed Project would also include nighttime security lighting and secure parking facilities. In addition, the continuous visible and non-visible presence of residents at all times of the day would provide a sense of security during evening and early morning hours. As such, the Proposed Project residents would be able to monitor suspicious activity at the building entry points. These preventative and proactive security measures would decrease the amount of service calls the LAPD would receive. In light of these features, it is anticipated that any increase in demands upon police services would be relatively low, and not necessitate the construction of a new police station, the construction of which may cause significant environmental impacts. Although the Project would not require the construction of a new or expanded police station, Mitigation Measures 14-3 and 14-4 would ensure that impacts to police protection services remain less than significant during Project operation.

Mitigation Measures

14-3 Public Services (Police – Demolition/Construction Sites)

- Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

14-4 Public Services (Police)

- The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

(iii) Schools

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on public schools shall be made considering the following factors: (a) the population increase resulting from the project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for school services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAUSD services (facilities, equipment, and personnel) and the project's proportional contribution to the demand; (c) whether (and to the degree to which)

accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and (d) whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

The Project area is currently served by the following LAUSD public schools: 9th Street Elementary School, located at 835 Stanford Avenue, which serves kindergarten through fifth-grade students; Hollenbeck Middle School, located at 2510 E. Sixth Street, which serves sixth- through eighth-grade students; Felicitas and Gonzalo Mendez Senior High, located at 1200 Plaza Del Sol, which serves ninth- through twelfth-grade students, and School of Engineering and Technology at Mendez Learning Center, located at 1200 Plaza Del Sol, which serves ninth- through twelfth-grade students.[39]

As shown in Table IV-22, Proposed Project Estimated Student Generation, the Proposed Project would generate approximately 57 elementary students, 15 middle school students, and 32 high school students for a total of approximately 105 students. It is likely that some of the students generated by the Proposed Project already reside in areas served by the LAUSD and would already be enrolled in LAUSD schools. However, for a conservative analysis, it is assumed that all students generated by the Proposed Project would be new to the LAUSD.

Table IV-22
Proposed Project Estimated Student Generation

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
Industrial Street Lofts Project					
Live/Work Units [a]	344 du	57	15	32	105

Notes:
sf = square feet; du = dwelling units
[a] *Student generation rates are as follows for residential uses: .1649 elementary, .0450 middle and .0943 high school students per unit.*
Source: Los Angeles Unified School District, School Fee Needs Analysis, September 2012.

California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirements against any construction within the boundaries of the district, for the purposes of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district's levy of the fees authorized by California Education Code Section 17620.

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. The provisions

[39] *Los Angeles Unified School District, Resident School Identifier, website: http://rsi.lausd.net/ResidentSchool Identifier/, accessed June 2013.*

of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA, or other state or local law.

The Project Applicant will be required to pay mandatory developer fees to offset the Proposed Project's demands upon local schools. Thus, the Proposed Project's potential impact upon public school services will be reduced to a less than significant level with RCM 14-1, below.

Regulatory Compliance Measure

RCM 14-1 Public Services (Schools)

- The Applicant shall pay school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.

(iv) Parks

Less Than Significant Impact. A significant impact would occur if the Proposed Project resulted in the construction of new recreation and park facilities that creates significant direct or indirect impacts to the environment.

The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. A half-mile radius is the standard service radius for neighborhood parks, and a two-mile radius is the standard service radius for community parks. Table IV-23 shows the parks and recreation centers that are located within an approximate two-mile radius of the Project Site, according to LADRP's facility locator.

The Public Recreation Plan (PRP), a portion of the Service Systems Element of the City of Los Angeles General Plan, provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards. The desired long-range standard for local parks is based on two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks or four acres per 1,000 persons of combined neighborhood and community parks. However, the PRP also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of one acre per 1,000 persons for neighborhood parks and one acre per 1,000 persons for community parks, or two acres per 1,000 people of combined neighborhood and community parks. It is important to note that these standards are City-wide goals and are not intended to be requirements for individual development projects.

The Project Site is located within a highly urbanized area of the Central City North community and, as shown in Table IV-23, Recreation and Park Facilities within the Project Area, has access to approximately 58.33 acres of parkland and public recreation facilities within a 2-mile radius. As summarized in the Table IV-23 below, these facilities range in size from a 0.09-acre pocket park to the 18-acre Hollenbeck Park and Recreation Center. It is estimated that the development of the Proposed Project would result in an increase of approximately 606 new residents to the Central City North Community Plan area. Based on the long-term parkland ratio goal of 4 acres per 1,000 residents, the Proposed Project would generate a need for

approximately 2.42 acres of public parkland. Based on the short and intermediate term goal, the Proposed Project would generate a need for approximately 1.21 acres of public parkland. Since the Project involves a zone change, this demand would be met through a combination of on-site open space proposed within the Project, payment of applicable taxes in accordance with LAMC Section 21.10.3(a)(1), payment of Quimby Fees pursuant to LAMC Section 12.33, and/or the availability of existing park and recreation facilities within the area. The Proposed Project would provide a minimum of 34,400 square feet of open space on-site. The Project would also be subject to the applicable provisions of LAMC Sections 12.33 and/or 17.12, requiring the payment of Quimby fees to the City of Los Angeles, or LAMC Section 21.10.3(a)(1) requiring payment of a Dwelling Unit Construction Tax. Therefore, with the implementation of RCM 14-2, impacts to parks and recreation centers would be less than significant. Thus, the Proposed Project's impact upon parks and recreational facilities would be reduced to a less than significant level.

Table IV-23
Recreation and Park Facilities within the Project Area

Park Name	Park Size	Park Amenities	Distance to Project Site
1. 6th and Gladys Street Park	0.33 acres	Basketball courts and children's play area.	0.5 miles
2. Aliso Pico Recreation Ctr.	4.41 acres	Auditorium, baseball diamond, basketball courts, children's play area, community room, indoor gym, tennis courts and volleyball courts.	1.3 miles
3. Spring Street Park	0.70 acres	Walking paths, landscaping, lawn, seating, water feature and art work	1.4 miles
4. Pershing Square	5.02 acres	Civic events, ice skating (seasonal), outdoor stage, open space and park benches.	1.4 miles
5. City Hall Park Center	1.71 acres	Open Space	1.4 miles
6. Boyle Heights Sports Ctr.	7.18 acres	Barbecue pits, baseball diamond, basketball courts, children's play area, community room and picnic tables.	1.5 miles
7. Los Angeles Plaza Park	1.81 acres	Open space	1.6 miles
8. Pecan Park	4.28 acres	Basketball courts, children's play area, community room, handball courts, indoor gym, picnic tables, restroom, seasonal pool and volleyball courts.	1.6 miles
9. Hollenbeck Park	18.30 acres	Auditorium, barbecue pits, basketball courts, children's play area, community room, indoor gym and picnic tables.	1.7 miles
10. Grand Park (Civic Center)	12 acres	Open space, benches, landscaping, coffee shop, performance lawn, event lawn, fountain, and community terrace.	1.7 miles
11. Grand Hope Park (FIDM)	2.50 acres	Children's play area, open space, garden pergolas and fountains	1.8 miles
12. Lani Vest Pocket Park	0.09 acres	Open Space	2 miles
Total Parkland	58.33 acres		

Source: City of Los Angeles Department of Recreation and Parks, Location Map, website: http://raponline.lacity.org/maplocator, accessed June 2013. Parcel sizes were measured using City of Los Angeles Department of Planning, Zone Information and Map Access System, *website: http://zimas.lacity.org/, accessed June 2013. Distances to facilities were measured within a two-mile walking distance from the Project Site using Google Maps, accessed June 2013.*

Regulatory Compliance Measure

RCM 14-2 Recreation (Increased Demand For Parks Or Recreational Facilities)

- Pursuant to Sections 12.33 and/or 17.12 of the Los Angeles Municipal Code, the Project Applicant shall pay the applicable Quimby fees for construction of dwelling units.
  or
- Pursuant to Section 21.10 of the Los Angeles Municipal Code, the Applicant shall pay the Dwelling Unit Construction Tax for construction of apartment buildings.

(v) Other Public Facilities

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Site. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on libraries shall be made considering the following factors: (a) the net population increase resulting from the project; (b) the demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to existing library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for library services (e.g., onsite library facilities or direct financial support to the Los Angeles Public Library).

Within the City of Los Angeles, the Los Angeles Public Library (LAPL) provides library services at the Central Library, seven regional branch libraries, 56 community branches and two bookmobile units, consisting of a total of five individual bookmobiles. Approximately 6.5 million books and other materials comprise the LAPL collection. The LAPL branches currently serving the Project Site include the Central Library, located at 630 W. 5th Street, approximately 1.6 miles northwest of the Project Site and the newly constructed Little Tokyo Branch Library located at 203 S. Los Angeles Street, approximately 1.2 miles northwest of the Project Site. Table IV-24 below lists these libraries and their corresponding volumes and circulation.

Table IV-24
Los Angeles Public Libraries

Name	Address	Size (sf)	Volumes / Circulation	Current / Future Service	Staff
Los Angeles Central Library	630 W. 5th St.	538,000	2.7 million / 942,297	3,792,621 / 4,298,891	174
Little Tokyo Branch	203 S. Los Angeles St.	12,500	67,107 / 172,580	43,912 / No Forecast	8.25
Current – 2010 Census; Future – 2020 SCAG projections *Staffing is full-time equivalent.*					

The City of Los Angeles Public Library ("LAPL") Criteria for New Libraries (formerly Site Selection Guidelines) recommended sizes for libraries are 12,500 sf facilities for communities with less than a population of 45,000 and 14,500 sf facilities for communities with a population of more than 45,000.[40] At 500,000 sf the Central Library far exceeds these criteria and currently meets the library demands of the surrounding community. Therefore, it would be able to meet the Proposed Project's demand for library services, and the Proposed Project's impacts upon library services would be less than significant.

The Project would generate approximately 606 residents and an increase of roughly 33 employees. Employees of commercial development do not typically frequent libraries during work hours, but are more likely to use libraries near their homes during non-work hours. The additional 606 residents represent a negligible (2.66%) amount of the current service population of the Little Tokyo Branch and would be accommodated in the future service population of the Central Library, which serves the entire City. Therefore, potential impacts to library service and facilities will be less than significant.

Cumulative Impacts

(i) Fire protection

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would result in an intensification of existing land uses in an already highly urbanized area of Los Angeles and could increase the demand for fire protection services in the vicinity of the projects. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Proposed Project and the related projects would contribute. Each project would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD in order to adequately mitigate fire protection impacts. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development on any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project area. Therefore, no impacts from new fire station construction are currently anticipated to occur. On this basis, the Proposed Project would not make a cumulatively considerable contribution to fire protection services, and cumulative impacts on fire protection would be less than significant.

(ii) Police protection

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would result in an intensification of existing land uses in an already heavily urbanized area of Los Angeles and could increase the demand for police protection services in the vicinity of the projects. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and

[40] *LAPL Strategic Plan (2007-2010)*

developer fees), to which the Proposed Project and the related projects would contribute. In addition, each project would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Furthermore, each related project would likely be required install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services.

To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development on any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently have any plans for the development of new police stations in the vicinity of the Project Site, no impacts with respect to construction of new stations are currently anticipated to occur. On this basis, the Proposed Project would not make a cumulatively considerable contribution to demand for police protection services, and cumulative impacts on police protection would be less than significant.

(iii) Schools

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. The Project in conjunction with the related projects is expected to result in a cumulative increase in the demand for school services.

As shown in Table IV-25, Projected Cumulative Student Population, the Proposed Project and the related projects would cumulatively contribute approximately 4,317 elementary school students, 2,071 middle school students, and 2,096 high school students. This would create an increased cumulative demand on the local school districts. However, like the Proposed Project, each related project would be required to pay school developer fees, pursuant to California Education Code Section 17620(a)(1), which would mitigate any cumulative impacts. As such, cumulative impacts on schools would be less than significant.

(iv) Parks

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects that include residential uses could result in an increase in permanent residents residing in the vicinity of the projects. In the absence of mitigation, additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the long-term goal standards. However, like the Proposed Project, the each related project with residential uses would comply with payment of Quimby or other fees, such as the Dwelling Unit Construction Tax (for apartment units). Each related project with residential uses would also be required to comply with the on-site open space requirements of the LAMC. Therefore, with payment of the applicable recreation fees on a project-by-project basis, cumulative impacts would be less-than-significant.

Table IV-25
Projected Cumulative Student Population

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
Hotel [a b]	1,365,050 sf	11	5	5	21
Industrial [c d]	661,869 sf	12	6	6	24
Multi-Family Residences [e]	19,207 du	3,922	1,898	1,911	7,731
Office [f g]	11,760,603 sf	274	127	123	524
Retail [h i]	2,702,003 sf	41	19	18	78
Related Projects Student Total: [i]		**4,260**	**2,055**	**2,063**	**8,378**
Project Net Student Total:		**57**	**15**	**32**	**105**
Cumulative Student Total:		**4,317**	**2,070**	**2,095**	**8,483**
Proposed Project's % of Cumulative:		**1.32%**	**0.72%**	**1.57%**	**1.23%**

Notes:
sf = square feet; du = dwelling units
[a] *Student generation rates are as follows for hotel uses: .0076 elementary, .0035 middle and .0034 high school students per 1,000 sf.*
[b] *Hotel rooms assumed to be 575 sf.*
[c] *Student generation rates are as follows for industrial uses: .0180 elementary, .0083 middle and .0080 high school students per 1,000 sf.*
[d] *Includes warehouse, manufacturing and bus maintenance uses.*
[e] *Student generation rates are as follows for residential uses: .2042 elementary, .0988 middle and .0995 high school students per unit.*
[f] *Student generation rates are as follows for office uses: .0233 elementary, .0108 middle and .0104 high school students per 1,000 sf.*
[g] *Includes office building, child care facility, courthouse, county office building, government building, jail, and medical offices uses.*
[h] *Student generation rates are as follows for retail uses: .0149 elementary, .0069 middle and .0067 high school students per 1,000 sf.*
[i] *Includes restaurant (fast-food and quality), retail, cinema, event facility, health club, market, museum, bar, shopping center, and supermarket uses.*

Source: Los Angeles Unified School District, School Fee Justification Study, September 2002.

(v) Other Public Facilities

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects that have residential components could generate additional residents who could increase the demand upon library services. This increase in resident population would increase demand upon public library services. To meet the increased demands upon the City's Public Library system, Los Angeles voters passed a Library Bond Issue for $178.3 million to improve, renovate, expand, and construct 32 branch libraries. Since the Program's inception in 1998, the Library Department and the Department of Public Works, Bureau of Engineering have made considerable progress in the design and construction of the branch library facilities. As noted, the Central Library far exceeds the LAPL criteria for its service area. Therefore, the Proposed Project would not make a considerable contribution to impacts upon the City's library system. Therefore, the cumulative impacts related to library facilities would be less than significant.

15. 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?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which would 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. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

The Proposed Project will generate 606 residents and will provide a minimum of 34,400 square feet of open space areas, including private open space on balconies and common open space areas within a rooftop pool deck, partial flag lot park area, and courtyards. The availability of these on-site recreation amenities and opportunities would serve to reduce the demand for off-site park services. Notwithstanding the availability of on-site recreational amenities and open space areas, it is reasonable to assume that the future occupants of the Proposed Project would utilize recreation and park facilities in the surrounding area. As noted in Table IV-23, above, there are 12 existing, new, and recently improved parks within the Project Area totaling more than 58 acres that are available to serve the future residents and retail visitors to the Project Site. Notable new additions to the downtown area are Grand Park, at the LA Civic Center, and Spring Street Park, a pocket park recently developed at 426 S. Spring Street. The Proposed Project would provide a minimum of 34,400 square feet of open space on site. The Project would also be subject to the applicable provisions of LAMC Sections 12.33 and/or 17.12, requiring the payment of Quimby fees to the City of Los Angeles, or LAMC Section 21.10.3(a)(1) requiring payment of a Dwelling Unit Construction Tax (See RCM 14-2, above). Therefore, the Proposed Project would not substantially increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

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

Less Than Significant Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. The Proposed Project will provide a minimum of 34,400 square feet of open space areas on site. As previously discussed in Section 15(a), the Proposed Project would not require the construction or expansion of recreational facilities beyond the limits of the Project Site. As noted above, there are 12

existing, new, and recently improved parks within the Project Area totalizing more than 58 acres that are available to serve the future residents and retail visitors to the Project Site. Recently constructed parks within the downtown area include Grand Park at the LA Civic Center and Spring Street Park, a pocket park recently developed at 426 S. Spring Street. Although the Proposed Project would place some additional demands on park facilities, the increase in demand would be met through a combination of on-site amenities and existing parks in the Project area. The Proposed Project's increased demands upon recreational facilities would not in and of itself require or result in the construction of a new park, which might have an adverse physical effect on the environment. Thus, impacts to park and recreational facilities would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects that have residential components would be expected to increase the cumulative demand for parks and recreational facilities in the City of Los Angeles. A number of new parks and recently renovated park improvements have been made in the downtown area to accommodate cumulative demands created by increased residential development. Each related project that includes residential uses would be required to pay the Dwelling Unit Construction Tax and/or Quimby fees to mitigate impacts upon park and recreational facilities. Additionally, each such related project would be subject to the provisions of the LAMC for providing on site open space, which is proportionately based on the amount of new development. Therefore, the Proposed Project would have a less than considerable significant contribution to the potential cumulative impact on recreational resources, and cumulative impacts on park and recreation facilities would be less than significant.

16. TRANSPORTATION AND TRAFFIC

The following section summarizes and incorporates by reference the information provided in the Traffic Study for the Camden Arts Mixed-Use Project (Industrial Street Lofts Traffic Study) prepared by The Mobility Group dated August 29, 2014 and the Traffic Review – Revised Camden Arts Mixed-Use Project prepared by the Mobility Group dated August 4, 2015. The Traffic Study and related approval letter from the Los Angeles Department of Transportation (DOT) dated October 8, 2014 and supplemental approval letter dated August 26, 2015 are attached to this IS/MND.

a) Would the project 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 Unless Mitigation Incorporated. A significant impact could occur if a project were to result in substantial increases in traffic volumes in the vicinity of the project such that the existing street capacity experiences a decrease in the existing volume to capacity ratios, or experiences increased traffic congestion exceeding LADOT's recommended level of service. As discussed in Section II, Project Description, vehicular access to the Project Site will be provided via a driveway entry/exit on

Industrial Street for Lot l One and a driveway on Mill Street for Lot Two. An additional right-in, right-out driveway on Alameda Street is proposed on Lot 1 (See Figure II-6, Lot 1 - Ground Floor Plan). The Alameda Street driveway would be gated and restricted to use by residents only and would operate with right-turn in and right-turn out restrictions.

Introduction

Area Transportation Facilities

The Project Site is located just east of downtown Los Angeles which is served by an extensive freeway network. Primary regional access to the site is provided by the Santa Monica Freeway (I-10) and the Santa Ana/Golden State Freeway (I-5/US-101). The Santa Monica Freeway runs in an east-west direction south of the Project Site, while the Santa Ana/Golden State Freeway runs north-south east of the site. These two facilities also provide access to the Hollywood (US-101) freeway to the north, and to the San Bernardino (I-10) and Pomona (SR-60) freeways to the east.

The following North-South Streets serve the Project study area:

Alameda Street: Alameda Street is a two-way street providing four travel lanes in the vicinity of the Project Site. It is classified as an Avenue I. No on-street parking is allowed.

Central Avenue: Central Avenue is a two-way street providing four travel lanes in the vicinity of the Project Site. It is classified as an Avenue I. On-street metered parking is provided with some restrictions.

Mateo Street: Mateo Street is a two-way street providing one travel lane in each direction in the vicinity of the Project Site. It is classified as an Avenue II. On-street parking is provided with some restrictions.

Mill Street: Mill Street is a two-way street providing one travel lane in each direction in the vicinity of the Project Site. It is classified as a Collector Street. On-street parking is provided with some restrictions. The following East-West Streets serve the Project study area:

The following East-West Streets serve the Project study area:

6th Street: 6th Street is a two-way street providing two travel lanes in each direction in the vicinity of the Project Site. It is classified as an Avenue II. On-street parking is generally not allowed.

7th Street: 7th Street is a two-way street providing two travel lanes in the vicinity of the Project Site. It is classified as an Avenue II. On-street parking is provided with some restrictions.

Industrial Street: Industrial Street is a two-way street providing one travel lane in each direction in the vicinity of the Project Site, west of Mill Street. East of Mill Street, it is a one way westbound street providing one travel lane. It is classified as a Collector Street. On street parking is provided with some restrictions.

Level of Service Methodology

Level of service (LOS) is a qualitative measure used to describe the condition of traffic flow, ranging from excellent conditions at LOS A to overloaded conditions at LOS F, with each level defined by a range of volume/capacity (V/C) ratios. Table IV-26 below defines the ranges of V/C ratios and their corresponding levels of service for signalized intersections. LOS D is typically recognized as the satisfactory service level in urban areas, and LOS E is often recognized as the standard in downtown areas. Intersection analysis was conducted using the "Critical Movement Analysis (Planning Method)" as described in "Transportation Research Circular 212, Transportation Research Board, Washington D.C. 1980," to obtain volume/capacity (V/C) ratios for each intersection.

Table IV-26
Level of Service as a Function of CMA Value or Average Vehicle Delay

CMA Value	Level of Service	Intersection Operation/Traffic Flow Characteristics
≤ 0.600	A	Excellent Operation
$> 0.600 \leq 0.700$	B	Very Good Operation
$> 0.700 \leq 0.800$	C	Good Operation
$> 0.800 \leq 0.900$	D	Fair Operation
$> 0.900 \leq 1.000$	E	Poor Operation
> 1.000	F	Forced Flow
Source: The Mobility Group, 2013.		

Thresholds of Significance

Intersection Capacity

LADOT defines a significant traffic impact attributable to a project based on a "stepped scale", with intersections at high volume-to-capacity (V/C) ratios being more sensitive to additional traffic than those operating with available surplus capacity. A significant impact is identified as an increase in the V/C value, due to project-related traffic, of 0.010 or more when the final ("with project") Level of Service is E or F, a V/C increase of 0.020 or more when the final Level of Service is LOS D, or an increase of 0.040 or more at LOS C, as summarized in Table IV-27, below. No significant impacts are deemed to occur at LOS A or B, as these operating conditions exhibit sufficient surplus capacities to accommodate traffic increases with little effect on traffic delays.

Table IV-27
City of Los Angeles Significant Traffic Impact Criteria

With Project Traffic		Project-Related Increase in V/C Ratio
LOS	V/C Ratio	
C	0.701 - 0.800	Equal to or greater than 0.040
D	0.801 - 0.900	Equal to or greater than 0.020
E or F	> 0.900	Equal to or greater than 0.010
Source: The Mobility Group, 2014.		

Study Intersections

The scope of the Traffic Study was reviewed and approved by the City of Los Angeles Department of Transportation (LADOT) to ensure that appropriate analysis methodologies and assumptions were utilized. Based on LADOT's recommendations, the traffic study evaluates the existing (year 2013) and forecast future (year 2017) conditions at six study intersections. The analyzed locations correspond to locations where potential traffic impacts from the Proposed Project are most likely to occur. The intersections identified for analysis are as follows:

- 6th Street & Central Avenue
- 6th Street & Alameda Street
- 6th Street & Mateo Street
- 7th Street & Central Avenue
- 7th Street & Alameda Street
- 7th Street & Mateo Street

All of these intersections are signalized and currently operate under the City's ATSAC system (Automated Traffic Surveillance and Control) which is a centralized control system that provides for the coordination of traffic signal timing to maximize the street capacities and to minimize traffic delays on City streets. The existing lane configurations for these six analyzed intersections are shown in 1525 Industrial Traffic Impact Study.

Existing Intersection Conditions

Existing Traffic Volumes

New traffic counts were conducted at all of the analyzed intersections to obtain existing turning movement counts. The traffic counts were conducted in April of 2013, for both the AM and the PM peak periods (between 7:00 and 10:00 am and between 3:00 and 6:00 pm). These counts were then factored by 1% to reflect 2014 conditions.

Existing Peak Hour Levels of Service

Table IV-28, below summarizes the existing AM and PM peak hour V/C ratios and corresponding levels of service at the analyzed intersections. As shown in Table IV-28, all of the studied intersections currently operate at LOS A during the AM peak hour. During the PM peak hour all of the studied intersections currently operate at LOS B or better.

Existing Transit Service

The Project Site is located near significant levels of transit and inter-city bus service. The Project Area is currently served by one local transit operator.

Table IV-28
Existing Conditions – Intersection Level of Service

Intersection	Existing Conditions			
	AM Peak Hour		PM Peak Hour	
	V/C	LOS	V/C	LOS
1. 6th Street and Central Avenue	0.409	A	0.616	B
2. 6th Street and Alameda Street	0.517	A	0.563	A
3. 6th Street and Mateo Street	0.360	A	0.358	A
4. 7th Street and Central Avenue	0.530	A	0.587	A
5. 7th Street and Alameda Street	0.565	A	0.607	B
6. 7th Street and Mateo Street	0.379	A	0.386	A
Source: Camden Arts Mixed-Use Project Traffic Study, The Mobility Group, August, 2014.				

Summary of Transit Service on Major Streets in the Project Vicinity

7th Street

Located one block south of the Project Site, 7th Street carries one Metro Rapid line (760) and two Metro Bus lines (60, 62) in an east-west direction. The Greyhound Bus Terminal is also located one block south of the Project Site on 7th Street, with inter-city bus service to various locations outside of the Los Angeles area.

6th Street

Located one block north of the Project Site, 6th Street carries one Metro Rapid Line (720), and one Metro Local line (18) in an east-west direction.

Central Avenue

Located one block west of the Project Site, Central Avenue carries one Metro Local Bus line (53) in a north-south direction.

Traffic Forecasts

In order to evaluate the potential traffic impacts of the Proposed Project, it was necessary to first estimate and then analyzes future traffic conditions without the Proposed Project. The year selected for this analysis was 2017 which is the expected year of completion of the Proposed Project.

Future traffic forecasts were estimated by forecasting two separate components of traffic growth in the study area.

The first component represents the ambient growth that is a general growth in traffic volumes due to minor new developments in the Proposed Project area, and regional growth and development outside the study area. A growth rate of 1% per year was assumed for this ambient traffic growth in conjunction with LADOT. The existing traffic counts were therefore adjusted upward by a total of 4% to represent the ambient growth to the Proposed Project completion year.

The second component of future growth relates to specific development projects located in the study area that are either under construction, approved, or under formal planning consideration and potentially could be in place by the year 2017 when the Proposed Project will be completed. The following section of this chapter describes the process of estimating traffic from these cumulative projects.

This approach is conservative in that not all of the related projects may be ultimately built, and not all may be built by 2017 (the buildout year of the Proposed Project). Along with the fact that the analysis includes a list of specific related projects and a general background growth factor, the analysis likely overstates the future growth in traffic without the Proposed Project.

Cumulative Projects

Project List

A list of proposed development projects that could affect traffic conditions in the Project area was prepared based on information obtained from a variety of sources including the City of Los Angeles, other studies and reports, and field verification and observations. A total of 73 potential development projects were identified, in conjunction with LADOT.

It should also be noted again that, for purposes of preparing a conservative worst-case analysis, no potential street improvements or transportation mitigation measures that might be associated with any of the cumulative projects were included in the future conditions traffic analysis.

Future Traffic Forecasts for 2017 Without Project Condition

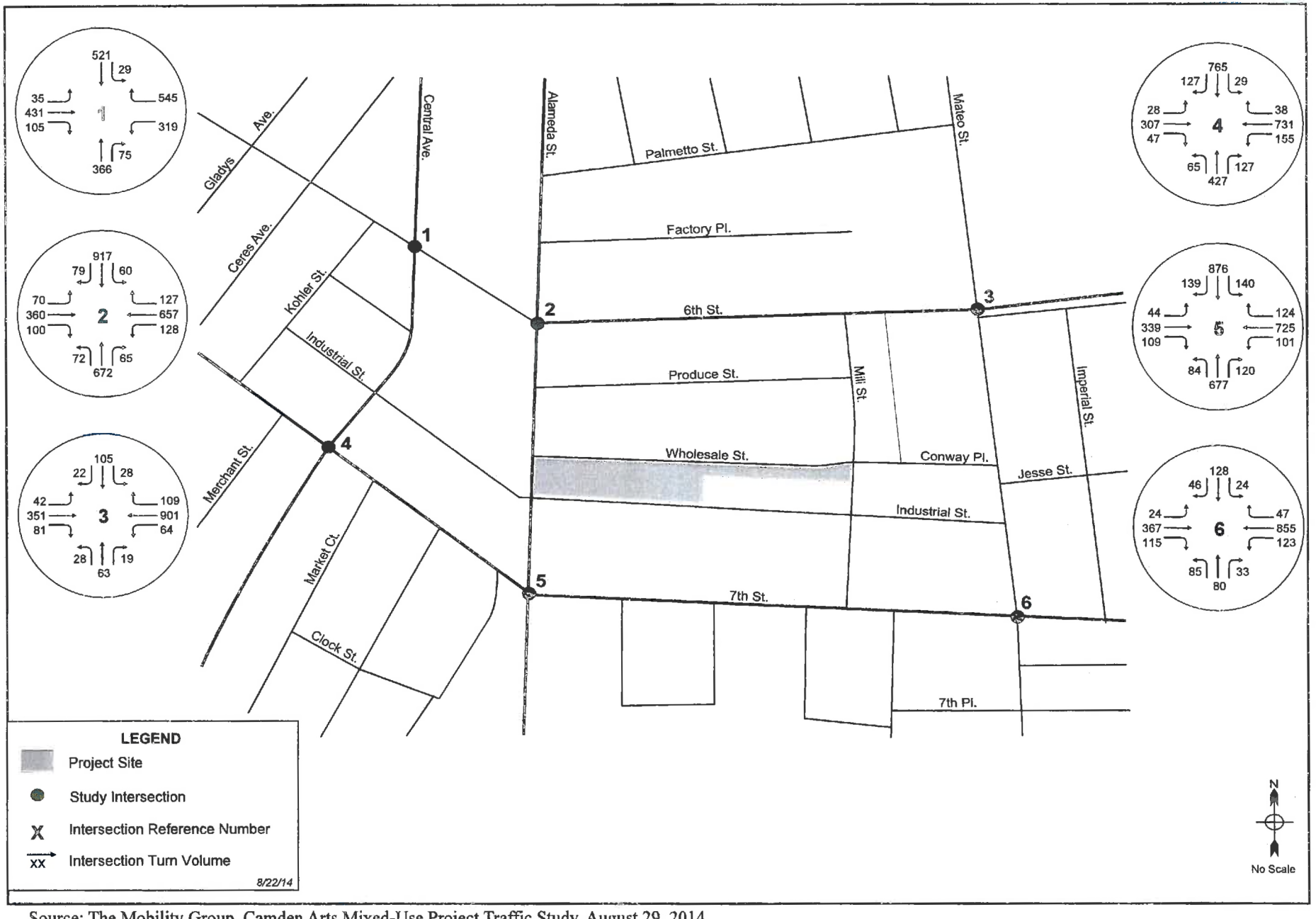
Future Traffic Forecasts for 2017 Without Project Condition trip estimates, were then added to the roadway network and combined with existing volumes and ambient traffic growth (described earlier) to provide forecasts of future traffic conditions in the study area in 2017, for both the AM and PM peak periods, representing the future without Proposed Project conditions. The future without Project peak hour traffic volumes are illustrated in Figures IV-2 and IV-3 for the AM and PM peak hours respectively.

Transportation System Improvement Projects

The following roadway infrastructure projects will be implemented prior to 2017.

Adaptive Traffic Control System – ATCS (LADOT)

ATCS is a second generation computer-based traffic signal control system to enhance ATSAC, that utilizes enhanced surveillance and control technologies to adapt traffic signal timing to respond to actual traffic conditions, and to further enhance the effectiveness of the ATSAC system by minimizing the number of stops and the amount of delay throughout the network. LADOT estimates that implementation of this system improves intersection capacity by an additional 3 percent over those operating under the ATSAC system alone. The City of Los Angeles has state funding to implement ATCS at all signalized intersections in the city. Per LADOT procedures, all study intersections were assumed to operate with ATCS in the future.



Source: The Mobility Group, Camden Arts Mixed-Use Project Traffic Study, August 29, 2014

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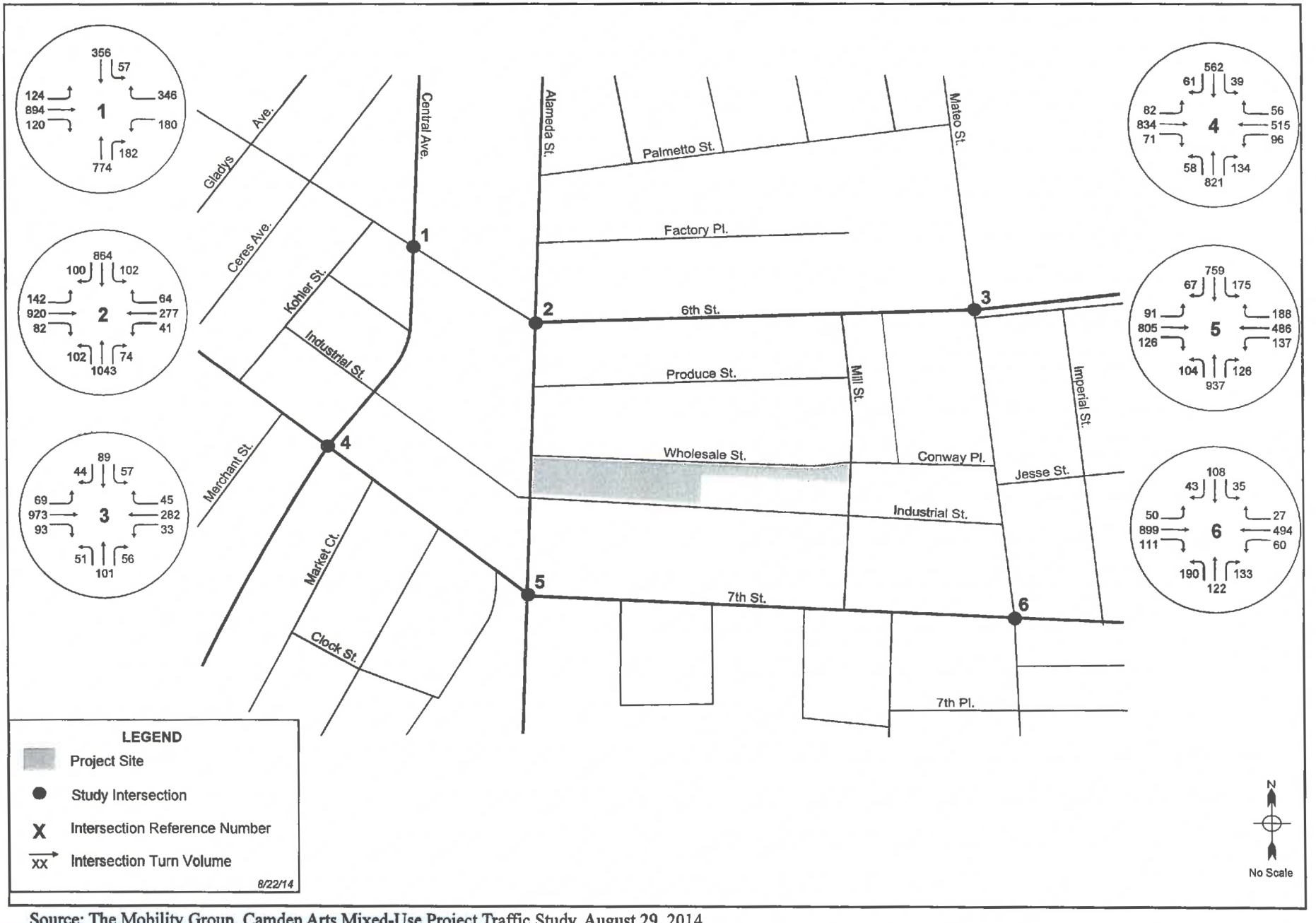
Figure IV-2
Future Without Project Traffic Volumes - AM Peak Hour



Source: The Mobility Group, Camden Arts Mixed-Use Project Traffic Study, August 29, 2014

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Figure IV-3
Future Without Project Traffic Volumes - PM Peak Hour

Future Intersection Conditions

Future Without Project Intersection Level of Service

The future without Project traffic forecasts were evaluated to determine the V/C ratio and LOS for the analyzed intersections for both the AM peak hour and the PM peak hour. The results are shown in Table IV-29, which summarizes the intersection levels of service calculated for the future without project conditions, and compares them to existing conditions levels of service. As shown in Table IV-29, below, all studied intersections would operate at LOS B during the AM peak hour in the future. During the PM Peak Hour, all studied intersections would operate at LOS C or better.

Table IV-29
Future Without Project Conditions - Intersection Level of Service

Intersection	Future Without Project Conditions			
	AM Peak Hour		PM Peak Hour	
	V/C	LOS	V/C	LOS
1. 6th Street and Central Ave.	0.459	A	0.715	C
2. 6th Street and Alameda Street	0.588	A	0.702	C
3. 6th Street and Mateo Street	0.387	A	0.454	A
4. 7th Street and Central Avenue	0.535	A	0.611	B
5. 7th Street and Alameda Street	0.607	B	0.773	C
6. 7th Street and Mateo Street	0.405	A	0.597	A
Source: Camden Arts Mixed-Use Project Traffic Study, The Mobility Group, August, 2014.				

Project Trip Generation

The Project Site is currently developed with an approximate 81,194 square foot ice production and cold storage facility, which is proposed to be demolished as part of the Project. The land uses to be located on Lot 1 will consist of up to 344 live/work units, 18,854 square feet of creative office space, and 2,568 square feet of restaurant space fronting on Industrial Street.

The flag lot (Lot 2) will consist of a recreational area that extends from the northeastern corner of Lot 1 east to Mill Street. This area will consist of a dog park for project residents, an open area consisting of concrete pavers, and a structure containing approximately 5,190 square feet of creative office space and 2,932 square feet of restaurant space accessible from Mill Street.

Vehicular access to Lot 1 is to be provided from driveways located on Alameda Street and Industrial Street. Access to Lot 2 is to be provided from Mill Street.

Trip generation from the Proposed Project was estimated using trip rates from Trip Generation Manual – 9th Edition (Institute of Transportation Engineers, 2012).[41] Tables IV-30 through IV-32 summarize the trip

[41] *Note the trip generation contained in the August 4, 2015 Traffic Impact Study Memorandum was based on ten additional dwelling units than are currently proposed (i.e., 354 du vs. 344 du). As such, the traffic impacts are slightly overstated and conservative. Additionally, although the program mix changed since the revised traffic*

generation estimates for the daily, AM peak, and PM peak hour periods, respectively.

Because of its downtown location near transit, employment and entertainment destinations, a number of Project trips would be expected to be walk or transit trips rather than auto vehicle trips. Similarly, because the commercial components of the Project will be primarily locally serving to the Project and the surrounding area, some of the trips might be expected to be walk-ins either from the Project or the surrounding area. Certain adjustments to the trip generation were therefore made, with LADOT approval, to reflect these conditions. The trips generated by all land use components of the Project (live/work, creative office, retail, and restaurant) were reduced by 15% to allow for use of transit to and from the Project Site. For the retail and restaurant uses, a reduction of 10% for internal trips from the Project and the surrounding area was also applied. For retail uses, a pass-by rate of 50% was applied and for the restaurant component of the Project, a pass-by rate of 20% was applied. As shown in Tables IV-30 through IV-32, the analysis estimates that the Proposed Project would generate a total of 2,277 daily vehicle trips, 128 AM peak hour vehicle trips, and 147 PM peak hour vehicle trips. The traffic volumes and impacts presented below are based on the Traffic Study analysis.

The likely distribution of Proposed Project trips was identified based on the type of land uses in the Project, the likely origins and destinations of Project residents and visitors, and the characteristics of the street system in the area of the Proposed Project. The following distribution was assumed:

- 25% of the trips towards the north
- 20% of the trips towards the south
- 20% of the trips towards the east
- 35% of the trips towards the west

Traffic generated by the Project was added to the Future Without Project traffic volumes to obtain future traffic volumes with the Project for both peak periods at each of the study intersections.

The Project Only peak hour traffic volumes are illustrated in Figures IV-4 and IV-5 for the AM and PM peak hours, respectively, and the total Future With Project conditions peak hour traffic volumes are illustrated in Figures IV-6 and IV-7 for the AM and PM peak hours, respectively.

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study was prepared (August 2015), the updated proposed trip generation tables (February 2016) indicate the am and pm peak hour trips are nearly identical. Thus, the impact conclusions of the 2015 Traffic Study remain applicable.

Table IV-30
Trip Generation Estimates – Daily Trips

Land Use Assumptions	Source & Code [1]	Quantity	Units	Daily Trips	
				Trip Rate	Total Trips
Existing Uses					
Ice Generation and Food Storage [2]	ITE 150	81,194	SF	3.56	-289
Net Ice Generation and Food Storage					-289
Proposed Uses					
Mid-Rise Apartments [3] [4]	ITE 223	346	DU	6.65	2,301
Reduction for transit/walk trips - 15%					-345
Net Apartments					1,956
General Office [5] [6] [7]	ITE 710	24,045	SF	11.03	265
Reduction for transit/walk trips - 15%					-40
Net General Office					225
Restaurant [8] [9] [10]	ITE 932	5,500	SF	127.15	699
Reduction for internal trips - 10%					-70
Reduction for transit trips - 15%					-94
Reduction for pass-by trips - 20%					-107
Net Restaurant					428
				Total Proposed Daily Trips	2,320

[1] ITE trip rates from Trip Generation, 9th Edition, Institute of Transportation Engineers, Washington, DC, 2012 except otherwise noted.
[2] Trip rates for Ice Generation and Food Storage not available. Trip rate from ITE 150 - Warehousing was used.
[3] Daily trip rate for ITE 223 - Mid-Rise Apartment are not available. Daily trip rate from ITE 220 - Apartment was used.
[4] Residential land use was adjusted to account for transit/walk trips (15%) per LADOT Traffic Study Policies and Procedures, Transit Credit, June 2013.
[5] A total of 24 residential live/work units (approximately 18,500 sq. ft.) could potentially be utilized as General office space once the Project is constructed. To ensure the most conservative analysis was conducted, this space was analyzed as General Office space.
[6] Source: Average trip rates for ITE 710 - General Office.
[7] Office land use was adjusted to account for transit/walk trips (15%) per LADOT Traffic Study Policies and Procedures, Transit Credit, June 2013.
[8] Source: Average trip rates for ITE 932 - High Turnover Restaurant.
[9] High Turnover Restaurant land use was adjusted to account for transit/walk trips (15%) per LADOT Traffic Study Policies and Procedures, Transit Credit, June 2013.
[10] High Turnover Restaurant land use was adjusted to account for pass-by trips (20%) per LADOT Traffic Study Policies and Procedures,
Attachment I - LADOT Policy on Pass-By Trips, June 2013.

Note: The trip generation estimates provided above are based on the current project description. Although the program mix has changed slightly since the update to the traffic study (August 4, 2015), the AM and PM peak hours trips are nearly identical. Therefore, the conclusions of the traffic study remain applicable.
Source: Traffic Review – Revised Camden Arts Mixed-Use Project prepared by the Mobility Group dated February 19, 2016.

Table IV-31
Trip Generation Estimates – AM Peak Hour

Land Use Assumptions	Source & Code[1]	Quantity	Units	AM Peak Hour					
				Trip Rate			Total Trips		
				In	Out	Total	In	Out	Total
Existing Uses									
Ice Generation and Food Storage [2]	ITE 150	81,194	SF	0.24	0.06	0.30	-19	-5	-24
Net Ice Generation and Food Storage							-19	-5	-24
Proposed Uses									
Mid-rise apartments [4]	ITE 223	346	DU	0.09	0.21	0.30	31	73	104
Reduction for transit/walk trips –							-5	-11	-16
Net Apartments							26	62	88
General Office [5] [6] [7]	ITE 710	24,045	SF	1.37	0.19	1.56	33	5	38
Reduction for transit/walk trips –							-5	-1	-6
Net General Office							28	4	32
Restaurant [8] [9] [10]	ITE 932	5,500	SF	5.95	4.86	10.81	33	26	59
Reduction for internal trips - 10%							-3	-3	-6
Reduction for transit trips - 15%							-5	-3	-8
Reduction for pass-by trips - 20%							-5	-5	-10
Net Restaurant							20	15	35
Total Proposed AM Peak Hour Trips							55	76	131

Notes:
See Table IV-30, above for footnotes.
Note: The trip generation estimates provided above are based on the current project description. Although the program mix has changed slightly since the update to the traffic study (August 4, 2015), the AM and PM peak hours trips are nearly identical. Therefore, the conclusions of the traffic study remain applicable.
Source: Traffic Review – Revised Camden Arts Mixed-Use Project prepared by the Mobility Group dated February 19, 2016.

Project Impacts

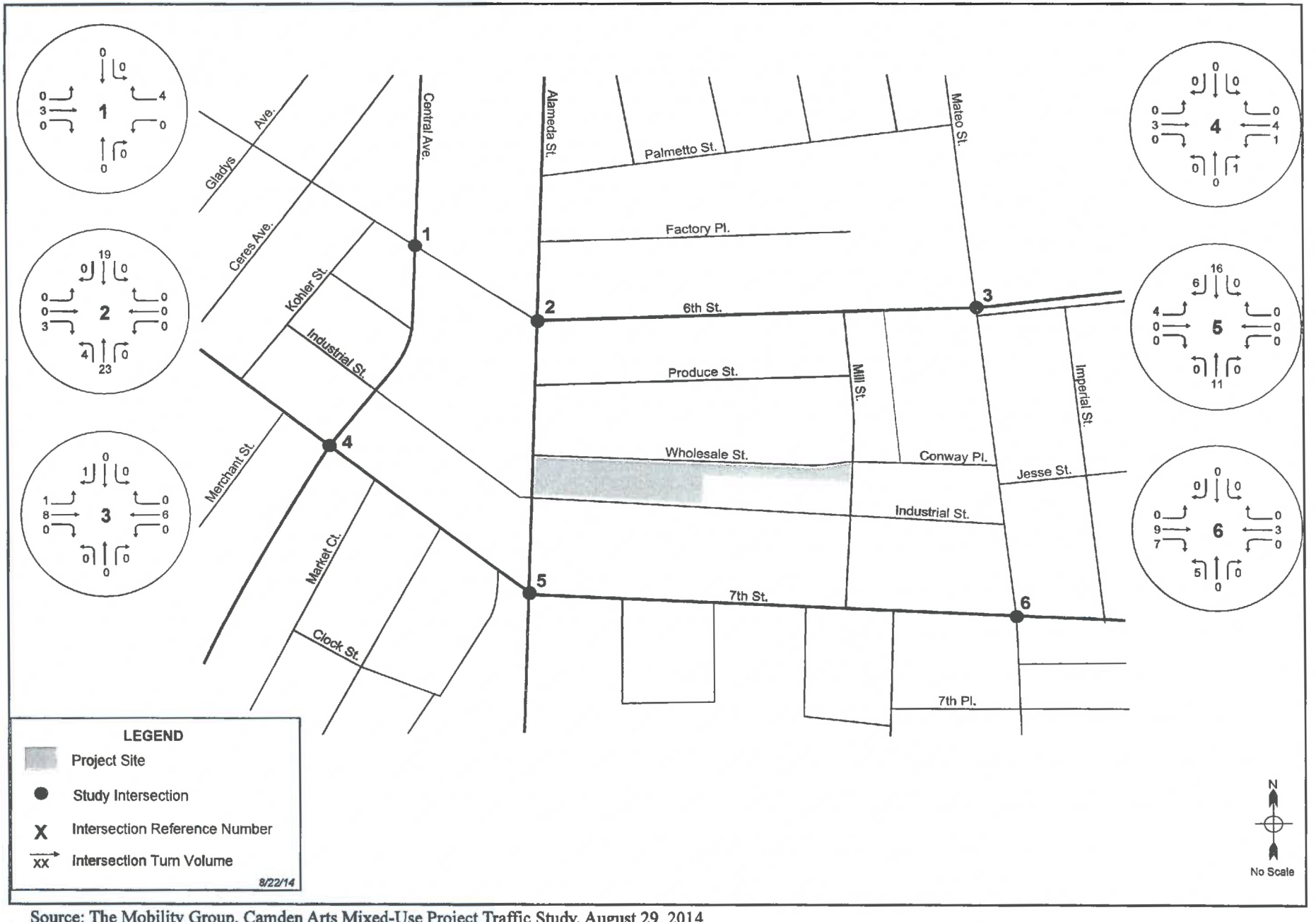
Existing With Project Impacts

Tables IV-33 and IV-34 summarize the level of service for the existing with Project conditions at the analyzed intersections for the AM and PM peak hours respectively. The analysis summarized in Table-IV-33 indicates that for the AM peak hour, the addition of Proposed Project traffic would not cause the level of service to change at any of the study intersections, and that any increases in volume/capacity (V/C) ratios would be less than the threshold for a significant impact to occur. The analysis summarized in Table IV-34 indicates that for the PM peak hour, the addition of Proposed Project traffic would not cause the level of service to change at any of the study intersections, and that any increases in volume/capacity (V/C) ratios would be less than the threshold for a significant impact to occur. It is therefore concluded that the Proposed Project would not cause any significant traffic impacts in either the AM or PM peak hour.

Table IV-32
Trip Generation Estimates – PM Peak Hour

Land Use Assumptions	Source & Code[1]	Quantity	Units	PM Peak Hour					
				Trip Rate			Total Trips		
				In	Out	Total	In	Out	Total
Existing Uses									
Ice Generation and Food Storage	ITE	81,194	SF	0.08	0.24	0.32	-6	-20	-26
Net Ice Generation and Food							-6	-20	-26
Proposed Uses									
Mid-rise apartments [3] [4]	ITE	346	DU	0.23	0.16	0.39	80	55	135
Reduction for transit trips – 15%							-12	-8	-20
Net Apartments							68	47	115
General Office [5] [6] [7]	ITE	24,045	SF	0.25	1.24	1.49	6	30	36
Reduction for transit trips – 15%							-1	-4	-5
Net General Office							5	26	31
Restaurant [8] [9] [10]	ITE	5,500	SF	5.91	3.94	9.85	33	21	54
Reduction for internal trips - 10%							-3	-2	-5
Reduction for transit trips - 15%							-4	-3	-7
Reduction for pass-by trips - 20%							-6	-2	-8
Net Restaurant							20	14	34
Total Proposed AM Peak Hour Trips							87	67	154

Notes:
See Table IV-30, above for footnotes.
Note: The trip generation estimates provided above are based on the current project description. Although the program mix has changed slightly since the update to the traffic study (August 4, 2015), the AM and PM peak hours trips are nearly identical. Therefore, the conclusions of the traffic study remain applicable.
Source: Traffic Review – Revised Camden Arts Mixed-Use Project prepared by the Mobility Group dated February 19, 2016.



Source: The Mobility Group, Camden Arts Mixed-Use Project Traffic Study, August 29, 2014

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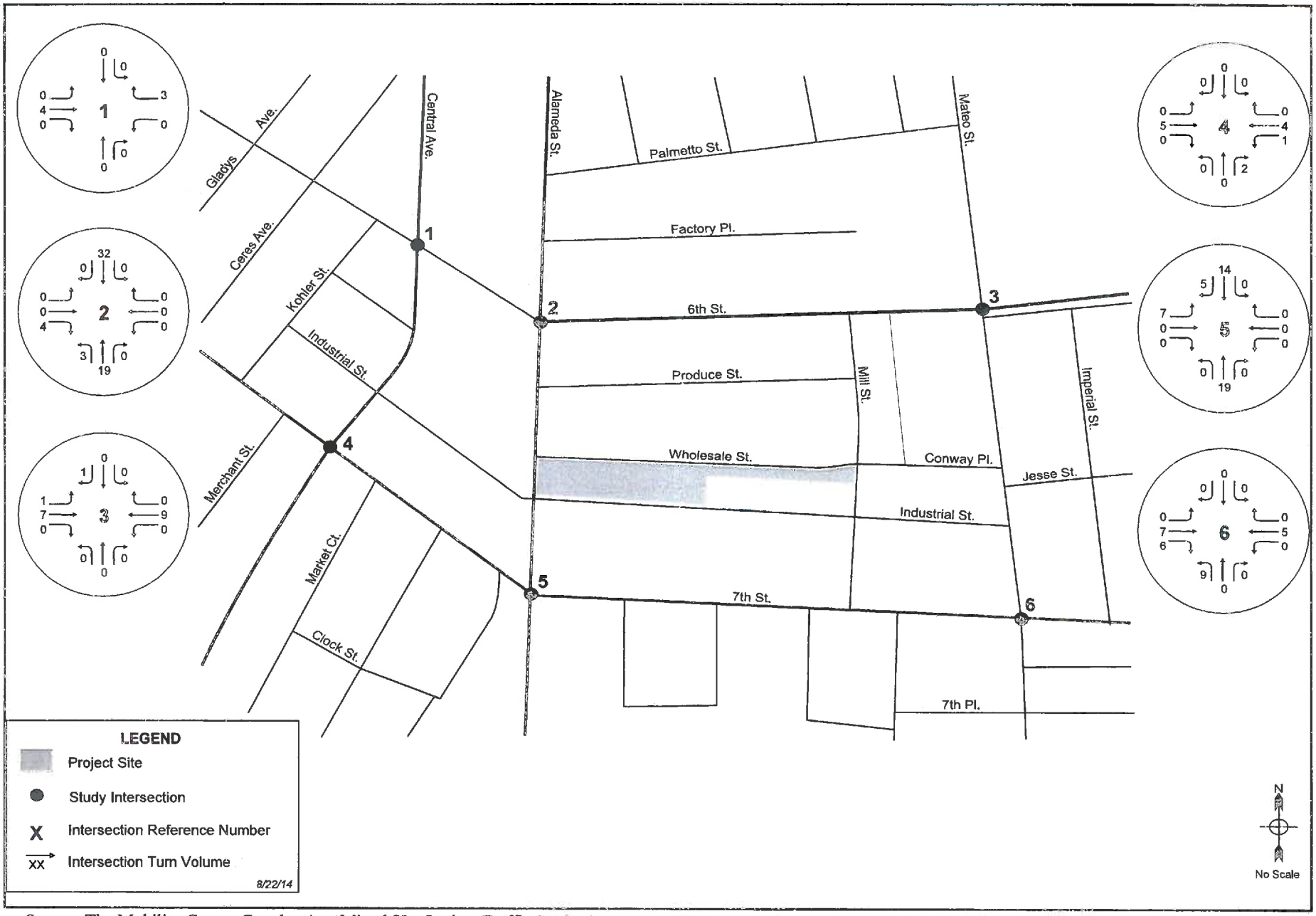
Figure IV-4
Project Only Traffic Volumes - AM Peak Hour



Source: The Mobility Group, Camden Arts Mixed-Use Project Traffic Study, August 29, 2014

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Figure IV-5
Project Only Traffic Volumes - PM Peak Hour



Source: The Mobility Group, Camden Arts Mixed-Use Project Traffic Study, August 29, 2014

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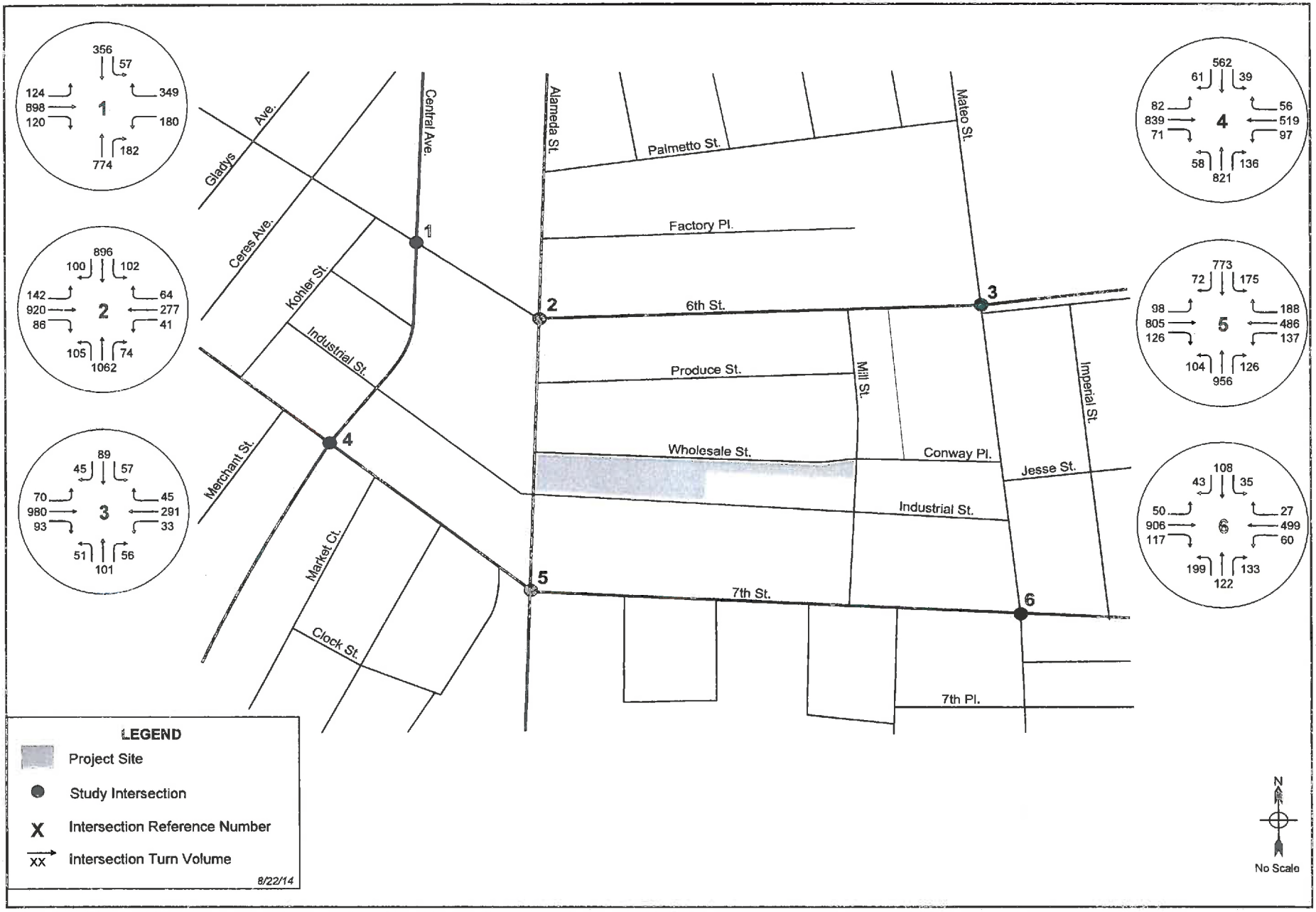
Figure IV-6
Future with Project Traffic Volumes - AM Peak Hour



Source: The Mobility Group, Camden Arts Mixed-Use Project Traffic Study, August 29, 2014

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Figure IV-7
Future with Project Traffic Volumes - PM Peak Hour

Table IV-33
Existing With Project Conditions – Intersection Level of Service AM Peak Hour

Intersection	AM Peak Hour				Change in V/C	Significant Impact?
	Existing		Existing With Project			
	V / C	LOS	V / C	LOS		
1. Central Avenue and 6th Street	0.409	A	0.411	A	0.002	No
2. Central Avenue and 7th Street	0.517	A	0.526	A	0.009	No
3. Alameda Street and 6th Street	0.360	A	0.363	A	0.003	No
4. Alameda Street and 7th Street	0.530	A	0.531	A	0.001	No
5. Mateo Street and 6th Street	0.565	A	0.575	A	0.010	No
6. Mateo Street and 7th Street	0.379	A	0.384	A	0.005	No
Source: Camden Arts Mixed-Use Project Traffic Study, The Mobility Group, August, 2014.						

Table IV-34
Existing With Project Conditions – Intersection Level of Service PM Peak Hour

Intersection	PM Peak Hour				Change in V/C	Significant Impact?
	Existing		Existing With Project			
	V / C	LOS	V / C	LOS		
1. Central Avenue and 6th Street	0.616	B	0.617	B	0.001	No
2. Central Avenue and 7th Street	0.563	A	0.570	A	0.007	No
3. Alameda Street and 6th Street	0.358	A	0.360	A	0.002	No
4. Alameda Street and 7th Street	0.587	A	0.591	A	0.004	No
5. Mateo Street and 6th Street	0.607	B	0.613	B	0.006	No
6. Mateo Street and 7th Street	0.386	A	0.397	A	0.011	No
Source: Camden Arts Mixed-Use Project Traffic Study, The Mobility Group, August, 2014.						

Project Driveways – Existing With Project Impacts

The LOS for all driveway access intersections for the Existing With Project conditions are shown in Table IV-35. The LOS for these driveway access intersections were estimated to be LOS D or better in both the AM and PM peak hours. These driveway access intersections would therefore operate satisfactorily with the Project. The Existing With Project driveway access volumes are shown in the 1525 Industrial Traffic Study.

Table IV-35
Existing With Project Conditions – Unsignalized (Access) Intersection Analysis

Unsignalized Intersections [a]	Future With Project AM Peak		Future With Project PM Peak	
	Delay	LOS	Delay	LOS
Alameda Street & Industrial Street				
Southbound Inbound Left Turn	9.3	A	10.0	A
Westbound Outbound Left/Right Turn	27.5	D	29.9	D
Alameda Street Residential Only				
Westbound Outbound Right Turn	10.6	B	11.5	B
6th Street & Mill Street				
Westbound Inbound Left Turn	8.3	A	9.7	A
Northbound Outbound Left/Right Turn	11.3	B	14.3	B
7th Street & Mill Street				
Eastbound Inbound Left Turn	9.4	A	8.5	A
Southbound Outbound Left/Right Turn	19.4	C	18.7	C

[a] Delay and LOS for unsignalized intersections are shown for the minor stopped approaches.
Source: Camden Arts Mixed-Use Project Traffic Study, The Mobility Group, March 20, 2014.

Future With Project Intersection Level of Service

Tables IV-36 and IV-37 summarize the level of service for the future with Project conditions at the analyzed intersections for the AM and PM peak hours, respectively. These tables also compare the level of service for Without Project and With Project conditions, show the increase in V/C ratios at each intersection due to the Project, and identify if the increase constitutes a significant impact The analysis summarized in Table IV-36 indicates that for the AM peak hour, the addition of Project traffic would not cause the level of service to change at any of the study intersections, and that any increases in volume/capacity (V/C) ratios would be less than the threshold for a significant impact to occur. In addition, the analysis summarized in Table IV-37 indicates that for the PM peak hour, the addition of Project traffic would cause the level of service to change at one of the study intersections (7th Street & Mateo Street) from LOS A to LOS B, and that any increases in volume/capacity (V/C) ratios would be less than the threshold for a significant impact to occur. Therefore, the Proposed Project would not cause any significant traffic impacts in either the AM or PM peak hour.

Table IV-36
Future With Project Conditions – Intersection Level of Service AM Peak Hour

Intersection	AM Peak Hour				Change in V/C	Significant Impact?
	Future Without Project		Future With Project			
	V / C	LOS	V / C	LOS		
1. 6th Street and Central Avenue	0.459	A	0.459	A	0.000	No
2. 6th Street and Alameda Street	0.588	A	0.597	A	0.009	No
3. 6th Street and Mateo Street	0.387	A	0.390	A	0.003	No
4. 7th Street and Central Avenue	0.535	A	0.537	A	0.002	No
5. 7th Street and Alameda Street	0.607	B	0.617	B	0.010	No
6. 7th Street and Mateo Street	0.405	A	0.410	A	0.005	No
Source: Camden Arts Mixed-Use Project Traffic Study, The Mobility Group, August, 2014.						

Table IV-37
Future With Project Conditions – Intersection Level of Service PM Peak Hour

Intersection	PM Peak Hour				Change in V/C	Significant Impact?
	Future Without Project		Future With Project			
	V / C	LOS	V / C	LOS		
1. 6th Street and Central Avenue	0.715	C	0.717	C	0.002	No
2. 6th Street and Alameda Street	0.702	C	0.709	C	0.007	No
3. 6th Street and Mateo Street	0.454	A	0.456	A	0.002	No
4. 7th Street and Central Avenue	0.611	B	0.613	B	0.002	No
5. 7th Street and Alameda Street	0.773	C	0.779	C	0.006	No
6. 7th Street and Mateo Street	0.597	A	0.607	B	0.010	No
Source: Camden Arts Mixed-Use Project Traffic Study, The Mobility Group, August, 2014.						

Project Driveways – Future With Project Conditions

As previously discussed, and shown in Figures II-6 in Section II, Project Description, access to the Project Site will be provided via the driveway on Industrial Street and a resident-only driveway on Alameda Street. Traffic can access the driveway on Industrial Street from Alameda Street & Industrial Street, 6th Street & Mill Street, and 7th Street & Mill Street, which are all unsignalized intersections. LADOT Traffic Study guidelines indicate that unsignalized intersections adjacent to the Project or integral to the Project's site access and circulation should be evaluated solely to determine the need for installation of a traffic signal or other traffic control device. Additionally, only those intersections where the estimated intersection delay is expected to result in LOS E or F under Future With Project conditions should be evaluated for the potential installation of a new traffic signal.

The Future With Project driveway access volumes are shown in 1525 Industrial Traffic Study. A Level of Service (LOS) analysis for these unsignalized intersections was conducted using the Highway Capacity Manual (HCM) method. Based on this analysis, the intersection of Alameda Street and Industrial Street would meet the criteria for traffic signal warrant analysis.

The LOS for all driveway access intersections for the Existing With Project conditions are shown in Table IV-38. The warrant analysis was based on the peak hour traffic volumes. The results of the traffic signal warrant analysis is shown in the Traffic Study. Based on this analysis, the peak hour traffic volumes would not warrant the installation of a traffic signal at the Alameda Street and Industrial Street intersection, and impacts would be less than significant.

The LOS for all driveway access intersections for the Existing With Project conditions are shown in Table IV-38.

Table IV-38
Future With Project Conditions – Unsignalized (Access) Intersection Analysis

Unsignalized Intersections [a]	Future With Project AM Peak		Future With Project PM Peak	
	Delay	LOS	Delay	LOS
Alameda Street & Industrial Street				
Southbound Inbound Left Turn	10.1	B	11.2	B
Westbound Outbound Left/Right Turn	42.6	E	62.8	F
Alameda Street Residential Only				
Westbound Outbound Right Turn	11.5	B	12.7	B
6th Street & Mill Street				
Westbound Inbound Left Turn	8.9	A	10.9	B
Northbound Outbound Left/Right Turn	12.9	B	18.3	C
7th Street & Mill Street				
Eastbound Inbound Left Turn	9.9	A	9.4	A
Southbound Outbound Left/Right Turn	25.9	D	30.8	D

[a] Delay and LOS for unsignalized intersections are shown for the minor stopped approaches.
Source: Camden Arts Mixed-Use Project Traffic Study, The Mobility Group, August, 2014.

CMP and Freeway Analysis

The Los Angeles County Congestion Management Plan (CMP) requires that new development projects analyze potential project impacts on CMP monitoring locations, if an EIR is prepared for the project. As an EIR is not being prepared for the Proposed Project, no CMP analysis is required. Nevertheless, for purposes of preparing a comprehensive study, a check was conducted against CMP criteria.

When a CMP analysis is required, the CMP methodology requires that the Traffic Study analyze traffic conditions at all CMP arterial monitoring intersections where the Proposed Project will add 50 or more trips during either the AM or PM weekday peak hours of adjacent street traffic. The CMP also requires that traffic studies analyze mainline freeway monitoring locations where the Proposed Project will add 150 or more trips in either direction during either AM or PM weekday peak hours. If, based on these criteria, the Traffic Study identifies no facilities for study then no further traffic analysis is required.

CMP Arterial Monitoring Locations

As shown previously, the Proposed Project would generate 131 AM peak hour trips and 155 PM peak hour trips. A review of the 2010 CMP indicated the following arterial monitoring stations that are closest to the Project Site:

- Washington Boulevard & Alameda Street
- Wilshire Boulevard & Alvarado Street
- Sunset Boulevard & Alvarado Street

As these are some distance from the Project Site, and as the Proposed Project's trips will disperse onto numerous roadways, it is therefore clear that the Proposed Project traffic volumes would not exceed the thresholds for analysis. Further, it is estimated that the maximum number of trips that the Proposed Project would add to any single CMP monitoring station would be nine trips in all directions at the Washington Boulevard & Alameda Street station.

CMP Freeway Monitoring Locations

A review of the 2010 CMP also indicated the following freeway segments that are closest to the Project Site:

- I-10 at Budlong Avenue;
- I-10 east of LA city limit;
- SR-60 east of Indiana Street;
- US-101 North of Vignes Street;
- SR-110 South of US-101;
- SR-110 North of Alpine Street

These segments are located some considerable distance from the Project Site. Nevertheless, the number of Project vehicle trips expected to pass through these segments was estimated based on the Project trip distribution and the Project trip generation. The maximum number of one-way Project trips that would be added to any single freeway segment at these monitoring locations would be six eastbound trips at the I-10 at Budlong Avenue station. Besides these CMP monitoring locations, the maximum number of one-way Project trips that would be added to any single freeway segment would be nine eastbound trips along the I-10 East of LA City Limit segment and 9 southbound trips along the I-5 North of 4th Street segment. With these low incremental volumes, which are below the CMP threshold of 150 trips, it is concluded that the Project would not cause any significant impacts to freeway operation.

CMP Transit Impact Analysis

Although not required because an EIR is not being prepared for the Project, an analysis of potential Project impacts on the transit system was also performed, per the CMP requirements and guidelines.

Based on factors in the *L.A. CEQA Thresholds Guide*, the following criterion was established to determine if there would be any significant transit impacts due to the Proposed Project:

- The capacity of the transit system serving the Project area would be substantially exceeded.

The number of transit trips that would be generated by the Proposed Project was estimated based on the trip generation methodology described previously. The estimate of base vehicle trips (unadjusted) for each Project land use was converted to person trips by applying a conversion factor of 1.4, as per CMP guidelines. The person trip numbers were then multiplied by the estimated percent taking transit for each land use, as previously determined and discussed earlier. These numbers are higher in some cases than the default countywide guidelines in the CMP but are more accurate in this instance as they reflect the higher transit use that would occur for the Project because of its downtown location. Because of the nature of the Project land uses, there would be a higher number of transit trips in the PM peak hour.

There would be approximately 30 net additional transit trips (14 inbound and 16 outbound) in the AM peak hour due to the Proposed Project, and approximately 36 additional transit trips (19 inbound and 17 outbound) in the PM peak hour. The highest number of additional transit trips would therefore occur in the PM peak hour.

The peak hourly capacity of the transit system serving the area of the Project Site is approximately 2,515 persons. The highest directional volume of peak hour trips added by the Proposed Project would be 19 trips. As this would be less than 0.8% of total transit capacity, it is concluded that the Project would not cause the capacity of the transit system to be substantially exceeded and therefore that the Project would not create any significant impacts on the transit systems serving the Project Area.

Construction Traffic

The Proposed Project would require the use of haul trucks during site clearing and excavation and the use of a variety of other construction vehicles throughout the construction of the Proposed Project. The addition of these vehicles onto the street system would contribute to increased traffic in the Project vicinity on a short-term basis during the construction of the Project. As noted in the Project Description (see Section II of this IS/MND), however, the haul trucks would travel along established traffic corridors as specified in the haul route application, such as S. Alameda Street and 6th Street. The haul trips would occur outside of the peak hours and during the permissible hauling hours identified in the haul route to be approved by the Department of Building and Safety. The Proposed Project's construction trip traffic would be a fraction of the operational traffic that would not cause any significant impacts at the studied intersections. Therefore, it is not anticipated that they could contribute to a significant increase in the overall congestion in the Project vicinity. In addition, any truck trips would be limited to the length of time required for the Project's

construction. Due to the off-peak and temporary nature of the traffic, construction impacts would be less than significant with the incorporation of Mitigation Measure 16-1, below.

Mitigation Measures

16-1 Transportation/Traffic

- A Construction work site traffic control plan shall be submitted to DOT for review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction related traffic shall be restricted to off-peak hours.

- All delivery truck loading and unloading shall take place on site.

- The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.

- Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.

- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.

- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

b) Would the project 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?

No Impact. As previously discussed in 16(a), no CMP freeway monitoring segment or intersection analysis is required and there would be no Proposed Project-related impacts to the CMP. The Proposed Project would not conflict with any travel demand measures. Therefore, no impacts related to congestion management programs and other standards would occur.

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

No impact. This question would apply to the Proposed Project only if it involved an aviation-related use or would influence changes to existing flight paths. The Project Site does not contain any aviation-related uses and the Project does not include development of any aviation-related uses. As such, due to its nature and scope, development of the Project would not have the potential to result in a change in air traffic patterns. Therefore, no impact related to air traffic patterns would occur.

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

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if a project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions. The Proposed Project would not include unusual or hazardous design features. However the Proposed Project will include a new vehicular access driveway to the Project Site, which, if not properly designed and constructed, could potentially conflict with pedestrian circulation in the Project area. Access to the Project Site will be provided via Industrial Street, as well as a resident-only driveway on Alameda Street. With proper site planning and implementation of Mitigation Measure 16-1 as identified above in Checklist Question 16(a), a required construction site work traffic control plan should be prepared to reduce impacts, thus, potential vehicle-pedestrian conflicts will be mitigated to a less than significant level.

e) Would the project result in inadequate emergency access?

No Impact. A significant impact may occur if the Project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses.

As previously discussed in Section 8(h), the Proposed Project is not located in or near an adopted emergency response or evacuation plan. Development of the Project Site may require temporary and/or partial street closures due to construction activities. However, any such closures would be temporary in nature and would be coordinated with the Departments of Transportation and Building and Safety. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. There are no hazardous design features included in the access design or site plan for the Proposed Project that could impede emergency access. Furthermore, the Proposed Project would be subject to the plot plan review requirements of the LAFD and the LAPD to ensure that all access roads and parking areas would remain accessible to emergency service vehicles. Therefore, the Proposed Project would not be expected to result in inadequate emergency access, and no significant impact would occur.

f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant Impact. A significant impact may occur if the Proposed Project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site.

The Proposed Project would not require the disruption of public transportation services or the alteration of public transportation routes. Furthermore, the Proposed Project would not interfere with any Class I or Class II bikeway systems, as there are no existing or proposed bike lanes along the roadways fronting the Project Site. With the incorporation of Mitigation Measure 16-1, above, the potential impacts to pedestrians during construction of the project will be reduced to a less than significant level. Since the Proposed Project would not modify or conflict with any alternative transportation policies, plans, or programs, it would have less than signifncant impacts on such programs.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would result in an increase in average daily vehicle trips and peak hour vehicle trips in the Central City North area. The Traffic Study for the Proposed Project included both an individual and cumulative analysis because the baseline under the Future With Project Conditions is the cumulative baseline. As set forth in Section 16(a), the Proposed Project would result in a less than significant cumulative traffic impact.

Construction Impacts

Future projects would require the use of haul trucks during site clearing and excavation and the use of a variety of other construction vehicles throughout their construction. The addition of these potential vehicles onto the street system would contribute to increased traffic on a short-term basis during the construction of a project. Specifically, there may be potential project-related construction period transportation impacts and corresponding mitigation measures that may not be directly related to future projects trip generation levels. Instead, these future potential impacts would most likely be the result of temporary capacity loss (such as intrusions into the City's right of way) from construction period activities. As a result, there will be a review of any such future project activities during construction for all development in the Project vicinity, if any, and measures to reduce potential cumulative impacts would be implemented accordingly.

Additionally, to ensure any potential construction related transportation and traffic impacts as the result of future developments are analyzed, all of the related projects will be required to conduct individual traffic studies. For each future development, a project-specific traffic impact analysis will be conducted, including an evaluation of ingress/egress routes, CMP analyses for arterial, freeway and transit facilities and on-site parking studies, if deemed necessary. This approach will assure that each related project is correctly analyzed and that the results of these analyses are accurate and appropriate. In addition, each related project would implement construction management programs to help reduce potential construction impacts to a

less than significant level. Therefore, the Proposed Project would not result in cumulatively considerable traffic impacts during construction.

Operational Impacts

As set forth above, the Proposed Project's transit demand would be less than 0.8% of total transit capacity. Therefore, the Proposed Project would not result in cumulatively considerable impacts on transit capacity.

With regard to parking, Proposed Project would provide at least the applicable minimum amount of parking required under the LAMC. Moreover, it is likely that some or all of the future related projects would, like the Project, be classified as residential or mixed-use residential projects on an infill site within a transit priority area, in which case parking impacts shall not be considered significant impacts on the environment under Public Resources Code Section 21099. Therefore, cumulative parking impacts would be less than significant.

Development of the Proposed Project and the related projects may require temporary and/or partial street closures due to construction activities. However, any such closures would be temporary in nature and would be coordinated with the Departments of Transportation and Building and Safety. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. Furthermore, such projects would be subject to the plot plan review requirements of the LAFD and the LAPD to ensure that all access roads and parking areas would remain accessible to emergency service vehicles. Therefore, cumulative impacts with respect to emergency access would be less than significant.

Additionally, development of the Proposed Project in conjunction with the related projects would not require the disruption of public transportation services or the alteration of public transportation routes. Furthermore, development of the Project in conjunction with the related projects would not interfere with any Class I or Class II bikeway systems, as there are no existing or proposed bike lanes along the roadways fronting the related projects' sites, or if there are such bike lanes, such projects would be required to be designed to avoid such interference. Since the Project and the related projects would not modify or conflict with any alternative transportation policies, plans, or programs, they would have no impact on such programs.

17. UTILITIES AND SERVICE SYSTEMS

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. A significant impact would occur if a project exceeds wastewater treatment requirements of the applicable RWQCB. Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge (ROWD) containing information which may be required by the appropriate Regional Water Quality Control Board. The RWQCB then authorizes an NPDES permit that ensures compliance with wastewater treatment and

discharge requirements. The Los Angeles RWQCB enforces wastewater treatment and discharge requirements for properties in the Project area.

Wastewater from the Project Site is conveyed via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Hyperion Treatment Plant (HTP). The HTP is a public facility and, therefore, is subject to the State's wastewater treatment requirements. The capacity of the HTP is discussed in response to 14(b) below. Wastewater from the Project Site is and would continue to be treated according to the wastewater treatment requirements enforced by the Los Angeles LARWQCB. The Project would not exceed the wastewater treatment requirements of the LARWQCB. Therefore, impacts with regard to wastewater treatment requirements would be less than significant.

b) Would the project 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?

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded.

Water Treatment Facilities and Existing Infrastructure

Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan Area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

LADWP ensures the reliability and quality of the City's water supply through an extensive distribution system that includes more than 7,100 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd). The average plant flow is approximately 450 mgd during the non-summer months and 550 mgd during the summer months, and operates at between 75 and 90 percent capacity. Therefore, the LAAFP has a remaining capacity of treating approximately 50 to 150 mgd, depending on the season.[42]

As shown in Table IV-39 below, the Proposed Project would generate a net additional demand for approximately 69,206 gallons per day (gpd) of potable water, significantly below available capacity.

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[42] *Los Angeles Department of Water and Power, website: http://www.ladwp.com/, accessed June 2013.*

Table IV-39
Proposed Project Estimated Water Demand

Type of Use	Size	Water Demand Rate (gpd/unit) [a]	Total Water Demand (gpd)
Existing Land Uses			
Industrial	81,194 sf	96 gpd/1,000 sf	7,794
Subtotal Existing			***7,794***
Proposed Project (Lots 1 and 2)			
Live/Work Units			
Live/Work Units	344 du	192 gpd/du	66,048
Creative Office [b]	24,044 sf	180 gpd/1,000 sf	4,328
Restaurant	5,500 sf (184 seats) [c]	36 gpd/ seat	6,624
		Total Project Water Demand	**77,000**
		Less Existing Water Demand	**-7,794**
		Net Additional Water Demand	**69,206**

Notes:
sf =square feet; du = dwelling units
[a] *L.A. CEQA Thresholds Guide (2006), Exhibit M.2-12. Water consumption is assumed to be 120% of wastewater generation.*
[b] *Office water demand rate was used for a conservative analysis.*
[c] *The seats for high turnover restaurant were estimated based on 20 sf per seat within the occupancy area, which was assumed to be two-thirds of the total floor area. Approximately one-third of the floor area is allocated to kitchen and storage uses.*
Source: Parker Environmental Consultants, 2016.

In accordance with the *L.A. CEQA Thresholds Guide*, the base estimated water demand was based on 120 percent of the sewerage generation factors for residential and commercial categories (Bureau of Sanitation, 1996). Based on the estimates provided in Table IV-39, Estimated Project Water Demand, implementation of the Proposed Project is not expected to measurably reduce the LAAFP's capacity; therefore, no new or expanded water treatment facilities would be required. The Project's water consumption increase represents a fraction of one percent of the remaining capacity currently available at LAAFP during the summer and non-summer months. Therefore, impacts to water treatment facilities would be less than significant as a result of the Project.

LADWP can generally supply water to development projects within its service area, except under extraordinary circumstances. Additionally, given the incremental increase in water consumption for the Project, and compliance with applicable water conservation ordinance and regulations such as California Code of Regulations (CCR), Title 20, Section 1604; CCR Title 22; City Ordinances 165,004 and 166,080; the Project would not require or result in the construction of new water treatment facilities.

Notwithstanding the above, as part of the building permit process, the lead agency would confirm that there is sufficient capacity in the water supply and infrastructure to accommodate the Project's water needs. If a deficiency or service problem is discovered during the permitting process that prevents the Project from an adequate level of service, the Project Applicant shall fund the required upgrades to adequately serve the Project. Implementation of Regulatory Compliance Measure 17-1 would ensure that the Project's impacts

to the water conveyance system would be less than significant.

There is currently a 12-inch water main on the easterly side of Alameda Street, an 8-inch water main on the southerly side of Industrial Street, and an 8- inch water main on the westerly side of Mill Street. DWP fire hydrants in close proximity to the site include one the on the southeast corner of Alameda Street and Industrial Street, connecting to the 12-inch main in Alameda Street, with a 6-inch gate valve and 6-inch lateral; one across from the site on the southerly side of Industrial Street, connecting to the 8-inch main in Industrial Street, with a 6-inch gate valve and 6-inch lateral; one north of the site on the east side of Alameda Street, connecting to the 12-inch main in Alameda Street, with a 6-inch gate valve and 6-inch lateral; and one just north of the site on Mill Street at Wholesale Street, connecting to the 8-inch main in Mill Street, with a 6-inch gate valve and 6-inch lateral. An additional fire hydrant is located southeasterly of the site on the southerly side of Industrial Street. The City has indicated that water service is available; however, water pressure at the Project Site has not been measured and a fire flow test will be required as part of the normal building permit process. Other than typical water service laterals, meters, and related devices, no extraordinary water facilities are anticipated. Additional fire hydrants may be required, depending on the building design and Fire Department access requirements.

In the event that any further water main and/or other infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be of a short-term nature, (b) the replacement of the water mains would be within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. Therefore, potential impacts resulting from water infrastructure improvements would be less than significant.

Regulatory Compliance Measure

RCM 17-1 As part of the normal construction/building permit process, the Applicant shall confirm with the City that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phase.

Wastewater Treatment Facilities and Existing Infrastructure

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to 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 (b) 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.

The Los Angeles Bureau of Sanitation provides sewer service to the Proposed Project area. Sewage from the Project Site is conveyed via sewer infrastructure to the HTP. The HTP treats an average daily flow of 362 million gallons per day (mgd), and has a design capacity to treat 450 mgd. This equals a remaining

capacity of 88 mgd of wastewater able to be treated at the HTP.[43] As shown in Table IV-40 below, the Proposed Project would generate approximately 57,671 gpd of net additional wastewater, representing a fraction of one percent of the available capacity. In accordance with the *L.A. CEQA Thresholds Guide,* the Project's estimated sewer flows were based on the sewerage generation factors for residential and commercial categories (Bureau of Sanitation, 1996). As the HTP has a remaining capacity to treat 88 additional mgd, it would have adequate capacity to serve the Proposed Project. Therefore, impacts to sewer treatment capacity would be less than significant.

Table IV-40
Proposed Project Estimated Wastewater Generation

Type of Use	Size	Wastewater Demand Rate (gpd/unit) [a]	Total Wastewater Demand (gpd)
Existing Land Uses			
Industrial	81,194	80 gpd/1,000 sf	6,496
Subtotal Existing			***6,496***
Proposed Project (Lots 1 and 2)			
Live/Work Units			
Live/Work Units	344 du	160 gpd/du	55,040
Creative Office [b]	24,044 sf	150 gpd/1,000 sf	3,607
Restaurant	5,500 sf (184 seats) [c]	30 gpd/ seat	5,520
		Total Project Wastewater Generation	**64,167**
		Less Existing Wastewater Generation	**-6,496**
		Net Additional Wastewater Generation	**57,671**

Notes:
sf =square feet; du = dwelling units
[a] *L.A. CEQA Thresholds Guide (2006), Exhibit M.2-12.*
[b] *Office wastewater demand rate used for a conservative analysis.*
[c] *The seats for high turnover restaurant were estimated based on 20 sf per seat within the occupancy area, which was assumed to be two-thirds of the total floor area. Approximately one-third of the floor area is allocated to kitchen and storage uses.*
Source: Parker Environmental Consultants, 2016.

The Proposed Project is located in a highly urbanized area of the City; therefore, local infrastructure exists to serve the Project Site. Facilities serving the Project Site include City-owned sewer mains within the rights-of-way of two of the Project Site's street frontages, including: a 22-inch vitrified clay pipe (VCP) sewer main east of the centerline in Alameda Street; a 24-inch VCP sewer main west of the centerline on Alameda Street; and an 8-inch VCP sewer main at the centerline in Industrial Street, which feeds into the 22-inch main in Alameda Street. Based on the configuration of sewer lines serving the Project Site, the Proposed Project's sewer flows may be routed to the lines under S. Alameda Street or Industrial Street, or split between lines. The Project Area is presently served by a network of sewer lines that are located beneath most of the major streets that convey sewage flows from the Project Area to the HTP. Through the rules and regulations established in the City of Los Angeles Sewer Allocation Ordinance (Ord. 166,060), the

[43] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Treatment Plant, website: http://san.lacity.org/lasewers/treatment_plants/hyperion/index.htm, accessed November 2013.*

Bureau of Sanitation does not make a determination of sewer capacity until LADBS has established that the Proposed Project's plans and specifications are acceptable for plan check. This process ensures the system can accept the anticipated wastewater flows from the Proposed Project at the time of connection, as opposed to prematurely committing to projects that are in the environmental review or entitlement process. At the time of connection, the Bureau of Sanitation will check the gauging of the sewer lines and make the appropriate decisions on how best to connect to the local sewer lines at the time of construction. The Applicant will be required to submit a Sewer Capacity Availability Request (SCAR) to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines receiving additional sewer flows from the Proposed Project. If it is determined that the sewer system has insufficient capacity to serve the Proposed Project, the developer may be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate the Proposed Project's increased flows. Based on the configuration of sewer lines serving the Project Site, the Proposed Project's sewer flows may be routed to the lines under Alameda Street and/or Industrial Street, or split between both lines. Any infrastructure improvements to update or expand the sewer lines in the Project vicinity, if necessary, would be limited to trenching, excavating and backfilling the sewer lines beneath the public right of way. Such construction activities would be localized in nature and would generally involve partial lane closures for a relatively short duration of time typically lasting a few days to a few weeks. Therefore, impacts to sewer capacity and infrastructure would be less than significant. Additionally, water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures, limitations on hose washing of driveways and parking areas, etc.) would be implemented as part of the Project and would help reduce the amount of Project-generated wastewater. Therefore, impacts to wastewater treatment facilities and existing infrastructure would be less than significant.

c) Would the project 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?

Less Than Significant Impact. A significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a Project Site, resulting in the construction of new stormwater drainage facilities. As described in Section 9(c) the Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project Site currently is and would continue to be collected on the site and directed towards existing storm drains in the Project vicinity. The Proposed Project will be required to demonstrate compliance with Low Impact Development Ordinance standards and retain or treat the first ¾ inch of rainfall in a 24-hour period. Thus, the rate of post-development runoff and pollutants from the parking area would be reduced under the Proposed Project. Therefore, Proposed Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems and impacts upon stormwater drainage facilities would be less than significant.

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

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District (MWD) of Southern California, which is obtained from the Colorado River Aqueduct. The MWD utilizes a land-use based planning tool that allocates projected demographic data from the SCAG into water service areas for each of MWD's member agencies. MWD's demographic projections use data reported in SCAG's 2012 RTP. These sources, along with recycled water, are expected to supply the City's water needs in the years to come. The 2010 Urban Water Management Plan projects a supply of 555,477 AFY in 2015. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with MWD purchases to rise to the level of demand.

As shown in Table IV-39, the Proposed Project's net increase for water demand would be 69,206 gallons per day or roughly 78 AF per year. This represents only approximately 0.001 percent of available supply. In addition, pursuant to LAMC Section 122.03(a), the Proposed Project is required to utilize water saving devices including, but not limited to, urinals equipped with flush-o-meter valves, which flush with a maximum of 1.28 gallons, which would further reduce impacts associated with this issue to a level that is less than significant. Environmental impacts would further be reduced by implementation of the following regulatory compliance and mitigation measures:

Regulatory Compliance Measure

RCM 17-2 The project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

Mitigation Measures

MM 17-1 Utilities (Local Water Supplies - Landscaping)

- In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:
  - Weather-based irrigation controller with rain shutoff
  - Matched precipitation (flow) rates for sprinkler heads
  - Drip/microspray/subsurface irrigation where appropriate
  - Minimum irrigation system distribution uniformity of 75 percent
  - Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials
  - Use of landscape contouring to minimize precipitation runoff
- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for existing and expanded irrigated landscape areas totaling 5,000 square feet and greater.

17-2 Utilities (Local Water Supplies - All New Construction)

- If conditions dictate pursuant to the LAMC, the Department of Water and Power may postpone new water connections for this project until water supply capacity is adequate.
- Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate.
- Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.
- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for all landscape irrigation uses.
- Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

17-3 Utilities (Local Water Supplies - New Commercial or Industrial)

- All commercial restroom faucets shall be of a self-closing design.

17-4 Utilities (Local Water Supplies - New Residential)

- Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.
- Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the Applicant shall be responsible for ensuring compliance.

- Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the Applicant shall be responsible for ensuring compliance.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to 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 (b) 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. As stated in 17 (b), above, the sewage flow will ultimately be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the Proposed Project.[44] Therefore, impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the SRRE or its updates, the SWMPP, Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multi-family developments, private haulers provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Within the City of Los Angeles, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill serve existing land uses within the City. Both landfills accept residential, commercial, and construction waste.

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[44] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Treatment Plant, website: http://san.lacity.org/lasewers/treatment_plants/hyperion/index.htm, accessed June 2013.*

The Sunshine Canyon Landfill is jointly operated by the City and the County, has a remaining capacity of 74.37 million tons.[45] Chiquita Canyon Landfill currently has a remaining capacity of 3.97 million tons.[46] Thus, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill combined have a remaining permitted daily intake of approximately 78.34 million tons. The Sunshine Canyon Landfill has an estimated remaining life of 20 years, and the Chiquita Canyon Landfill has an estimated remaining life of 2 years. An expansion of the Chiquita Canyon Landfill is currently proposed and would add a capacity of 53,312,400 tons (a 26-year life expectancy based on 2011 daily average). As of June 30, 2011, Sunshine Canyon Landfill accepted approximately 9,000 tpd during the week and 3,000 tpd on Saturday (due to reduced hours of operation).[47] Therefore, the Sunshine Canyon Landfill has a remaining daily capacity intake of approximately 3,100 tpd during the week.

The Azusa Land Reclamation Landfill is an unclassified facility that accepts construction and demolition (C&D) waste. It has an existing remaining disposal capacity of 64.13 million tons. In 2012, approximately 0.089 million tons of inert waste (e.g., soil, concrete, asphalt, and other construction and demolition debris) were disposed of at this unclassified landfill. Given the remaining permitted capacity and based on the average disposal rate of 286 tons per day in 2012, this capacity will be exhausted in 718 years.[48] Thus, the unclassified landfill serving the County has adequate long-term capacity.

Construction Impacts

The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. As summarized in Table IV-41, below, it is estimated that approximately 8,179 tons of solid waste would be generated by the Project's C&D activities. This represents a tiny fraction of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 64.13 million tons. Moreover, as of January 1, 2011 all contractors operating within the City of Los Angeles are required to source separate materials on site for recycling and/or use a permitted private waste hauler to deliver mixed materials to a certified processor for recycling (see Regulatory Compliance Measure RCM 17-3, below). Thus, only a small percentage of the C&D debris would end up in regional landfills.

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[45] *County of Los Angeles Department of Public Works, 2012 Annual Report, Los Angeles Countywide Integrated Waste Management Plan, August 2013.*

[46] *Ibid.*

[47] *Sunshine Canyon Landfill Newsletter, Volume 7, Issue 2, July 2011, website: http://www.sunshinecanyonlandfill.com/home/newsletter/July_2011_Newsletter.pdf, September, 2013.*

[48] *County of Los Angeles, Department of Public Works; Los Angeles County IWMP 2012 Annual Report, August 2013.*

Table IV-41
Estimated Demolition and Construction Debris

Construction Activity	Size (gsf)	Rate [a] (lbs./sf)	Generated Waste (tons)
Demolition			
Industrial/Warehouse	81,194 sf	173	7,023
Construction			
Live/Work Units (344 DU)	299,302 sf	4.38	655
Lobby/Leasing Area	7,458	4.02	15
Non-residential	29,544 sf	4.02	59
Parking [b]	211,928 sf	4.02	426
TOTAL			**8,179**

Notes:
[a] *U.S. EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-4, June 1998. Construction debris is based on gross building area and thus exceeds the buildable floor area for purposes of calculating FAR.*
[b] *Includes gross building area within the mixed-use structure not otherwise accounted for in the LAMC floor area calculations for residential and non-residential uses.*
Source: Parker Environmental Consultants, 2016.

Exported soil would be deposited at a fill site or, more likely, used as daily cover at a landfill. Thus, being beneficial, there is no limit of the amount that can be accepted.[49] The Proposed Project's impacts on solid waste during construction would be less than significant.

Operational Impacts

As shown in Table IV-42, Proposed Project Solid Waste Generation, the Project's net generation during operation of the Proposed Project would be 4,682 pounds per day. This estimate is relatively conservative, as it does not factor in any recycling or waste diversion programs. The Proposed Project's solid waste would be handled by private waste collection services. The amount of solid waste generated by the Proposed Project is within the available capacities at area landfills. Therefore, the impacts would be less than significant.

[49] *Draft EIR for the Convention and Event Center Project, SCH No. 2011031049, April 5, 2012, Page IV.K.3-19, fn 10, certified October 4. 2012.*

Table IV-42
Expected Operational Solid Waste Generation

Type of Use	Size	Solid Waste Generation Rate [a] (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Existing Land Uses			
Industrial (approx. 104 employees) [b]	81,194 sf	8.93 lbs/employee/day	929
		Subtotal Existing	***929***
Proposed Project (Lots 1 and 2)			
Live/Work Units	344 du	12.23 lbs/du/day	4,207
Creative Office (approx. 82 employees) [c]	24,044 sf	10.53 lbs/employee/day	858
Restaurant (approx. 55 employees) [d]	5,500 sf	10.53 lbs/employee/day	579
		Total Project Solid Waste Generation	**5,645**
		Less Existing Solid Waste Generation	**-929**
		Net Additional Solid Waste Generation	**4,716**

Notes:
sf =square feet; du = dwelling units
[a] *Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
[b] *Existing industrial waste generation rate based on L.A. CEQA Thresholds Guide (2006) and an estimated employee generation rate of 781 sf per employee based per the ITE Trip Generation Manual.*
[c] *The number of creative office employees was based on approximately 1 employee per every 295 square feet of office area per the ITE Trip Generation Manual for general office uses.*
[d] *Number of employees was projected based on approximately 1 employee per every 100 square feet of retail/restaurant area per the ITE Trip Generation Manual.*
Source: Parker Environmental Consultants, 2016.

Regulatory Compliance Measures

17-3 Utilities (Solid Waste Recycling)

- *(Operational)* All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.
- (*Operational*) Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program.
- (*Construction/Demolition*) Prior to the issuance of any demolition or construction permit, the Applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.
- (*Construction/Demolition*) To facilitate on-site separation and recycling of demolition- and construction-related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and the contents recycled accordingly as a part of the project's regular solid waste disposal program.

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The Proposed Project would generate solid waste that is typical of a residential mixed-use building with ground floor retail uses and would comply with all federal, state, and local statutes and regulations

Project waste would be disposed of in compliance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939. The amount of Project-related waste disposed of at area landfills would be reduced through recycling and waste diversion programs implemented by the City, in compliance with the City's Solid Waste Management Policy Plan, which is the long-range solid waste management policy plan for the City, and the Source Reduction and Recycling Element, which is the strategic action policy plan for diverting solid waste from landfills.

The Project would also comply with applicable regulatory measures, including the provisions of City Ordinance No. 171,687, regarding recycling for all new construction and other recycling measures; the provision of permanent, clearly marked, durable, source-sorted bins to facilitate the separation and deposit of recyclable materials; and implementation of a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction.

Overall, waste generated by the Project would not alter the projected timeline for landfills within the region to reach capacity. The Project would comply with federal, state, and local regulations and impacts would be less than significant.

Cumulative Impacts

Wastewater

Development of the Proposed Project in conjunction with the related projects would result in an intensification of existing land uses in an already heavily urbanized area of Los Angeles and could further increase demands for sewer service. As discussed above, the HTP treats an average daily flow of 362 mgd, and has capacity to treat 450 mgd. This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP. In accordance with the State Wastewater Discharge Requirements (WDR), the City audits its SSMPs a minimum of once every two years, including a review of their compliance with the WDRs and effectiveness in controlling and responding to sanitary sewer overflows. The last audit was completed in February 2013 which confirmed that the City's SSMPs are in full compliance and perform exceptionally well.[50]

With respect to local infrastructure, under the rules and regulations established in the City of Los Angeles Sewer Allocation Ordinance (Ord. 166,060), the Bureau of Sanitation assesses the anticipated wastewater flows from development projects at the time of connection, and makes the appropriate decisions on how

[50] *Ibid.*

best to connect to the local sewer lines at the time of construction. The developer of each related project will be required to submit a SCAR to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines receiving additional sewer flows from the Proposed Project and other related projects. If it is determined that the sewer system in the local area has insufficient capacity to serve a particular development, the developer of that project may be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate that project's increased flows. Each project would be evaluated on a case-by-case basis and would be required to consult with the Bureau of Sanitation and comply with all applicable city and state water conservation programs and sewer allocation ordinances. Therefore, cumulative impacts on wastewater services would be less than significant.

Water

Development of the Proposed Project in conjunction with the related projects would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles and could further increase the demand for potable water within the City. Through the 2010 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2035. This estimate is based in part on demographic projections obtained for the LADWP service area from the MWD. The MWD utilizes a land-use based planning tool that allocates projected demographic data from the SCAG into water service areas for each of MWD's member agencies. MWD's demographic projections use data reported in SCAG's 2012 RTP. As discussed previously in this section under the Population and Housing subheading, the Proposed Project in conjunction with the related projects would be consistent with the regional and local population and housing growth projections. As such, the additional water demands generated by these projects are accounted for in the 2010 Urban Water Management Plan (UWMP) and impacts associated with increased water demand would not be cumulatively considerable. To the extent any related project is not consistent with the growth forecasts of the 2010 UWMP, those projects would be subject to a project specific assessment by the LADWP to ensure adequate water supplies are available to serve those specific projects. Through this process, cumulative impacts upon regional water supplies would be reduced to less than significant levels.

Stormwater

Development of the Proposed Project in conjunction with the related projects would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles and could further increase regional demands on stormwater facilities. A significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, resulting in the construction of new stormwater drainage facilities. As discussed earlier, stormwater on each related project site would be collected on their respective site, retained and treated in compliance with the City's LID ordinance, and directed towards existing storm drains. As a result of the new requirements under the City's LID ordinance, the amount of peak stormwater flows from new development would decrease as compared to older sites that were improved prior to the requirement to

retain the first ¾ inches of rainfall during storm events. Therefore, the Proposed Project and related projects would not result in cumulative stormwater impacts.

Solid Waste

Development of the Proposed Project in conjunction with the related projects would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles and could further increase regional demands on landfill capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing landfills serving the City of Los Angeles.

As the County's unclassified landfill generally does not face capacity shortages, the County's unclassified landfill would be able to accommodate construction waste from the Proposed Project and the related projects. Therefore, cumulative impacts would be less than significant.

As discussed above, the 2012 Annual Report demonstrates that future disposal needs can be adequately met through the planning period (i.e., 2027) without disposal capacity shortages via a multi-pronged approach that includes successfully permitting and developing proposed in-County landfill expansions, utilizing available or planned out-of-County disposal capacity, developing necessary infrastructure to facilitate exportation of waste to out-of-County landfills, and developing conversion and other alternative technologies. Additionally, by continuing to enhance diversion programs and increasing the countywide diversion rate, jurisdictions in the County may further ensure adequate disposal capacity is available to serve the needs of the residents and businesses through the planning period. Solid waste disposal is an essential public service that must be provided without interruption in order to protect public health and safety as well as the environment. Jurisdictions in the County continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with Countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2012 Annual Report. The Proposed Project and the related projects would be consistent with and would further City policies that reduce landfill waste streams. Such policies and programs serve to implement the strategies outlined in the 2012 Annual Report to adequately meet countywide disposal needs through 2027 without capacity shortages. It is reasonable to assume that concerted actions will continue to be taken by jurisdictions towards expanding and enhancing waste reduction and recycling programs, and implementing prudent solid waste management strategies. Therefore, the Proposed Project and related projects would not result in cumulative operational solid waste impacts.

As reported by the Bureau of Sanitation in 2009, the City had achieved a waste diversion rate of 65 percent. The City is exceeding the state-mandated diversion goal of 50 percent by 2000 set by the CIWMA of 1989.[51] Waste diversion rates are required to increase to 75 percent by 2025 and through on-going development of waste management infrastructure over the last decade and innovative source reduction, reuse, recycling, and composting programs have been implemented. These programs include Green Mulching and

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[51] *The City of Los Angeles Department of Public Works Bureau of Sanitation, Overview of Services for FY 2005/06, updated June, 14 2005. http://www.lacity.org/san/general info/about us/our services/overview of services.pdf.*

Composting workshops, black yard trimming recycling cans, the City-owned CLARTS and Residential Special Material and Electronics Recycling or S.A.F.E. Centers. New programs are being implemented to increase the amount of waste diverted by the City, including: multi-family recycling, food waste recycling, commercial recycling and technical assistance and support for City departments to help meet their waste reduction and recycling goals. The City is also developing programs to ultimately meet a goal of zero waste by 2030. Thus, contribution of the Proposed Project to cumulative impacts will continue to decrease as it increases waste diversion rates in accordance with City goals. Therefore, solid waste impacts will be less than cumulatively considerable, and cumulative impacts with respect to solid waste would be less than significant.

18. 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?

No Impact. A significant impact may occur only if the Proposed Project would have an identified potentially significant impact for any of the above issues. The Proposed Project is located in a densely populated urban area and would have no unmitigated significant impacts with respect to biological resources and less-than-significant cultural resource impacts provided the mitigation measures listed above are implemented. The Proposed Project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, no impact would occur.

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

Less than Significant Impact. A significant impact may occur if the Proposed Project, in conjunction with other related projects in the area of the Project Site, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. The Proposed Project would not combine with related projects to create a cumulatively significant impact in any of the environmental issues analyzed in the IS/MND.

In particular, the Project and related projects are anticipated to comply with applicable federal, state, and city regulations that would preclude significant cumulative impacts regarding geology and soils, cultural resources, hazards and hazardous materials, hydrology and water quality, and transportation and traffic. These resource areas (geology and soils, cultural resources, hazards and hazardous materials, and hydrology) are site-specific, such that each related project would need to be evaluated within its own site-specific context.

Further, the cumulative traffic analysis for "Future Year 2017" found that no intersections would be significantly impacted by the Project in combination with the related projects.

Regarding aesthetics and land use, compliance with City design and land use standards would ensure that any cumulative impacts related to aesthetics and land use would be less than significant. Further, related projects would be individually evaluated for consistency with applicable land use standards. Aesthetics is a subjective resource area in which each project must be analyzed within its own local setting to determine whether visual character of a site is affected. In addition, it is likely that most if not all of the future development under the Policy Initiative would also be transit priority projects. In such case, aesthetic impacts shall not be considered significant pursuant to Public Resources Code Section 21099. Any increase in area population from the Project and the related projects is anticipated to be within regional and local forecasts.

With respect to cumulative demand on public services, each cumulative project would be individually subject to review by LAFD and LAPD, and would be required to comply with all applicable safety requirements. Further, funding for any new facilities would be funded via existing mechanisms (i.e., sales taxes and government funding) to which all cumulative developments would contribute. All cumulative projects would also be required to pay any applicable developer fees to the LAUSD, and Quimby and/or Park and Recreation fees to the LADRP, for development of residential projects. As such, cumulative demands on public services would be less than significant.

Impacts with respect to water consumption, wastewater generation, and solid waste generation resulting from the Proposed Project would be less than significant with implementation of provided mitigation measures, where applicable. These mitigation measures identified for the Project are standard mitigation measures from the City that would also apply to the related projects.

Therefore, the Proposed Project's incremental contribution to cumulative impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project has the potential to result in significant impacts, as discussed in the preceding sections. As described throughout this environmental impact analysis, with implementation of the recommended mitigation measures, where applicable, the Proposed Project would not result in any unmitigated significant impacts. Thus, the Proposed Project would not have the potential to result in substantial adverse effects on human beings and impacts would be less than significant.

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VI. REFERENCES AND ACRONYMS

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2. ACRONYMS AND ABBREVIATIONS

AAM	Annual Arithmetic Mean
AB	Assembly Bill
ACM	Asbestos-containing materials
AEP	Association of Environmental Professionals
AFY	Acre-feet per year
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
ASTM	American Society of Testing and Materials
ASTs	above-ground storage tanks
ATCS	Adaptive Traffic Control System
Basin	South Coast Air Basin
BMPs	Best Management Practices
C/D	construction/demolition
CAA	Clean Air Act
CAAQS	California ambient air quality standards
Cal/EPA	California Environmental Protection Agency
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code (2007)
CCAA	California Clean Air Act
CCAR	California Climate Action Registry
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CDMG	California Division of Mines and Geology
CEC	California Energy Commission
CEQA	California Environmental Quality Act

CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
Cf	Cubic feet
CFC	Chlorofluorocarbons
CGS	California Geological Survey
CH_4	Methane
CHMIRS	California Hazardous Material Incident Report System
CiSWMPP	City of Los Angeles Solid Waste Management Policy Plan
City Zoning Code	City of Los Angeles Planning and Zoning Code
CMP	Congestion Management Plan
CNEL	Community Noise Exposure Level
CO	carbon monoxide
CO_2	carbon dioxide
CO2e	carbon dioxide equivalent
COHb	carboxyhemoglobin
COPC	Chemical of Potential Concern
CORRACTS	Corrective Action Treatment, Storage, and Disposal Facilities
CPA	Community Plan Area
CPT	cone penetrometer test
CPU	Crime Prevention Unit
CRA/LA	Community Redevelopment Agency of the City of Los Angeles
CWA	Clean Water Act
CWC	California Water Code
cy	cubic yards
dB	decibel
dBA	A-weighted decibel scale
d/D	flow level
DHS	California Department of Health and Services
DWP	Department of Water and Power
DWR	California Department of Water Resources
du	dwelling unit
EIR	Environmental Impact Report
EMS	Emergency Medical Service
EOO	Emergency Operations Organization
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
EZ	Los Angeles State Enterprise Zone
FAR	Floor Area Ratio
FCAA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
GBCI	Green Building Certification Institute

GHG	greenhouse gas
gpd	gallons per day
gpm	gallons per minute
GWP	Global Warming Potential
HFC	hydrofluorocarbons
HSA	Hyperion Service Area
HTP	Hyperion Treatment Plant
HVAC	Heating, Ventilation and Air Conditioning
I-10	Santa Monica Freeway
I-101	Hollywood Freeway
ISO	Interim Control Ordinance
ITE	Institute of Transportation Engineers
km	kilometers
kV	kilovolt
kWh	kilowatt-hours
LAA	Los Angeles Aqueduct
LABS	Los Angeles Department of Public Works Bureau of Sanitation
LADBS	Los Angeles Department of Building and Safety
LADOT	Los Angeles Department of Transportation
LADRP	Los Angeles Department of Recreation and Parks
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LAPL	Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LBP	Lead-based paint
lbs/day	pounds per day
LCFS	Low Carbon Fuel Standard
L_{dn}	day-night average noise level
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent energy noise level/ambient noise level
LOS	Level of Service
LST	localized significance thresholds
LUST	leaking underground storage tank
LUTP	Land Use/Transportation Policy
MBTA	Migratory Bird Treaty Act
MCE	Maximum Considered Earthquake
MEP	maximum extent practicable
Metro	Los Angeles County Metropolitan Transit Authority
mgd	million gallons per day

mi	miles
MPO	Metropolitan Planning Organization
MS4	medium and large municipal separate storm sewer systems
msl	mean sea level
mm	millimeters
M_{max}	maximum moment magnitude
MTA	Metropolitan Transportation Authority
MWD	Metropolitan Water District
MWh	Mega-Watt hours
N_2O	nitrous oxide
NAAQS	National ambient air quality standards
NFRAP	No Further Remedial Action Planned Sites
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
O_3	Ozone
OAL	California Office of Administrative Law
OPR	Office of Planning and Research
Pb	lead
PEC	Potential environmental concern
PFC	perfluorocarbons
PGA	peak horizontal ground acceleration
PM	particulate matter
PM_{10}	respirable particulate matter
$PM_{2.5}$	fine particulate matter
ppd	pounds per day
ppm	parts per million
PRC	Public Resources Code
PSI	pounds per square inch
PUC	Public Utilities Commission (also see CPUC)
PWS	Public water suppliers
RCP	Regional Comprehensive Plan
RCPG	Regional Comprehensive Plan and Guide
RCRA	Resource Conservation Recovery Act
RD	Reporting District
REC	Recognized Environmental Condition
ROG	Reactive Organic Gases
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill

SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCG	Southern California Gas Company
SCH	State Clearinghouse
sf	square feet
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SLIC	Spills, Leaks, Investigation and Cleanup
SO_2	sulfur dioxide
SO_4	sulfates
SOx	sulfur oxides
SOPA	Society of Professional Archeologist
SPT	Standard Penetration Test
SR-110	Harbor Freeway
SRA	source receptor area
SRRE	Source Reduction and Recycling Element
SWAT	Solid Waste Assessment Test
SWF/LF	Solid Waste Information System
SWFP	Solid Waste Facility Permit
SWMP	stormwater management plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	Toxic Air Contaminants
TOD	Transit Oriented District
TPH	total petroleum hydrocarbons
TSD	Treatment, Storage, and Disposal
TSP	Transportation Specific Plan
ULSD	Ultra Low Sulfur Diesel
US-101	Hollywood Freeway
USEPA/ U.S. EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGBC	United States Green Building Council
USGS	U.S. Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
V/C	Volume-to-Capacity
VCP	Voluntary Cleanup Plan
VdB	Vibration decibels
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound

WMA	Watershed Management Area
WMUDS	Waste Management Unit Database System
WSA	Water Supply Assessment
µg/m3	micrograms per cubic meter
ZIMAS	Zoning Information and Map Access System

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MITIGATION MONITORING AND REPORTING PROGRAM

A. INTRODUCTION

Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a "reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment" Section 15097 of the *CEQA Guidelines*, Mitigation Monitoring or Reporting, provides additional direction on mitigation monitoring or reporting. This Mitigation Monitoring Program (MMP) has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6, and Section 15097 of the CEQA Guidelines. The City of Los Angeles is the Lead Agency for this Project.

An Initial Study / Mitigated Negative Declaration (IS/MND) has been prepared to address the potential environmental impacts of the Industrial Street Lofts Project ("Proposed Project") (City of Los Angeles Case No. ENV-2013-2994-MND, CPC-2013-2993-GPA-VZC-HD-DB-MCUP-SPR, and VTT 74122). Where appropriate, this environmental document identified the Proposed Project's design features, regulatory compliance measures, or recommended mitigation measures to avoid or to reduce potentially significant environmental impacts of the Proposed Project. This MMP is designed to monitor implementation of the mitigation measures identified for the Proposed Project.

The MMP is subject to review and approval by the City of Los Angeles as the Lead Agency as part of the approval process of the Proposed Project, and adoption of project conditions. The required mitigation measures are listed and categorized by impact area, as identified in the IS/MND.

The Project Applicant shall be responsible for implementing all mitigation measures, unless otherwise noted, and shall be obligated to provide documentation concerning implementation of the listed mitigation measures to the appropriate monitoring agency and the appropriate enforcement agency as provided for herein. All departments listed below are within the City of Los Angeles unless otherwise noted. The entity responsible for the implementation of all mitigation measures shall be the Project Applicant unless otherwise noted.

As shown on the following pages, each required mitigation measure for the Proposed Project is listed and categorized by impact area, with accompanying discussion of:

Enforcement Agency: the agency with the power to enforce the Mitigation Measure.

Monitoring Agency: the agency to which reports involving feasibility, compliance, implementation and development are made, or whom physically monitors the project for compliance with mitigation measures.

Monitoring Phase: the phase of the project during which the Mitigation Measure shall be monitored.

- Pre-Construction, including the design phase
- Construction
- Pre-Operation
- Operation (Post-construction)

Monitoring Frequency: the frequency of which the Mitigation Measure shall be monitored.

Action Indicating Compliance: the action of which the Enforcement or Monitoring Agency indicates that compliance with the required Mitigation Measure has been implemented.

The MMP performance shall be monitored annually to determine the effectiveness of the measures implemented in any given year and reevaluate the mitigation needs for the upcoming year.

It is the intent of this MMP to:

- Verify compliance of the required mitigation measures of the IS/MND;
- Provide a methodology to document implementation of required mitigation;
- Provide a record and status of mitigation requirements;
- Identify monitoring and enforcement agencies;
- Establish and clarify administrative procedures for the clearance of mitigation measures;
- Establish the frequency and duration of monitoring and reporting; and
- Utilize the existing agency review processes' wherever feasible.
- This MMP shall be in place throughout all phases of the Proposed Project. The entity responsible for implementing each mitigation measure is set forth within the text of the mitigation measure. The entity responsible for implementing the mitigation shall also be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that compliance with the required mitigation measure has been implemented.

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made by the Project Applicant or its successor subject to the approval by the City of Los Angeles through a public hearing. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or

modification. The flexibility is necessary in light of the proto-typical nature of the MMP, and the need to protect the environment with a workable program. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

B. MITIGATION MONITORING PROGRAM

The organization of the MMP follows the subsection formatting style as presented within the IS/MND. Subsections of all of the environmental chapters presented in the IS/MND are provided below. For environmental issue areas where no mitigation measures were required, the MMP is noted accordingly.

1. AESTHETICS

No mitigation measures are necessary.

2. AGRICULTURAL RESOURCES

No mitigation measures are necessary.

3. AIR QUALITY

No mitigation measures are necessary.

4. BIOLOGICAL RESOURCES

No mitigation measures are necessary.

5. CULTURAL RESOURCES

No mitigation measures are necessary.

6. GEOLOGY AND SOILS

No mitigation measures are necessary.

7. GREENHOUSE GAS EMISSIONS

No mitigation measures are necessary.

8. HAZARDS AND HAZARDOUS MATERIALS

- **8-1 Hazardous Materials Site.** The Applicant shall comply with the following recommendations as specified in the Phase I Environmental Site Assessment (ESA) in the design and construction of the Industrial Street Lofts Project to the satisfaction of the Department of Building and Safety:
  - Based on the results of the ESA no further inquiry and/or investigation of the subject property is considered practical at this time, and thus none are recommended. However, the Applicant should be aware that isolated pockets of impacted subsurface soil may be encountered during construction and, if encountered, are likely to affect the construction schedule for the planned development. In addition, the unknown underground feature,

encountered by BAS, will require further assessment and removal. Should this feature be confirmed to be an underground storage tank, a specialized contractor shall be retained to handle the decommissioning and removal of the tank and associated impacted soil, if any.

- In the event that the current owners leave the facility "as is" (i.e., all existing equipment, chemicals, debris, waste, etc., will remain at the site and thereby become the property of Camden upon taking possession of the property), the applicant shall retain the services of a qualified demolition contractor, experienced in handling items, which may contain regulated substances and thus require proper draining/ containerization and subsequent disposal/recycling.
- Should existing engineered fill under Freezer #5 be re-used at the site (based on geotechnical recommendations), the fill soil shall be tested in order to assess whether it meets the residential land use criteria.
- A construction contingency plan for dealing with both anticipated and potential occurrences of environmentally sensitive situations during site redevelopment shall be established and adhered to during construction.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Fire Department
Monitoring Agency: Los Angeles Department of Building and Safety; Los Angeles Fire Department
Monitoring Phase: Pre-construction
Monitoring Frequency: Once during plan check
Action Indicating Compliance: Issuance of Certificate of Occupancy or Use of Land

9. HYDROLOGY AND WATER QUALITY

No mitigation measures are necessary.

10. LAND USE AND PLANNING

10-1 Land Use / Planning

- An air filtration system shall be installed and maintained with filters meeting or exceeding the ASHRAE Standard 52.2 Minimum Efficiency Reporting Value (MERV) of 11, to the satisfaction of the Department of Building and Safety.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once, at plan check
Action Indicating Compliance: Plan approval

11. MINERAL RESOURCES

No mitigation measures are necessary.

12. NOISE

12-1 Increased Noise Levels (Demolition, Grading, and Construction Activities)

- Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday and national holidays.
- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices.
- Noise and groundborne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.
- Barriers such as, but not limited to, plywood structures or flexible sound control curtains extending eight feet in height shall be erected around the perimeter of the construction site to minimize the amount of noise during construction on the nearby noise-sensitive uses.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Issuance of Certificate of Occupancy or Use of Land

12-2 Increased Noise Levels (Mixed-Use Development)

- Wall and floor-ceiling assemblies separating commercial tenant spaces, residential units, and public places, shall have a Sound Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413.

Enforcement Agency: Los Angeles Department of City Planning (plan review); Los Angeles Department of Building and Safety (operation)
Monitoring Agency: Los Angeles Department of City Planning (plan review); Los Angeles Department of Building and Safety (operation and maintenance)
Monitoring Phase: Pre-construction; Construction
Monitoring Frequency: Once, at plan check for the Project, once during field inspection

Action Indicating Compliance: Plan approval and issuance of applicable building permit (Pre-construction); Issuance of Certificate of Occupancy of Use of Land (Construction)

12-3 Increased Noise Levels (Parking Structure Ramps)

- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Pre-construction; Construction
Monitoring Frequency: Once, at plan check for the Project, once during field inspection
Action Indicating Compliance: Plan approval and issuance of applicable building permit (Pre-construction); Issuance of Certificate of Occupancy of Use of Land (Construction)

13. POPULATION AND HOUSING

No mitigation measures are necessary.

14. PUBLIC SERVICES

14-1 The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features:

- Fire lanes, where required, shall be a minimum of 20 feet in width;
- All structures must be within 300 feet of an approved fire hydrant; and
- Entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

Enforcement Agency: Los Angeles Department of Building and Safety, Los Angeles Fire Department
Monitoring Agency: Los Angeles Department of Building and Safety, Los Angeles Fire Department
Monitoring Phase: Pre-construction
Monitoring Frequency: Once, at plan check
Action Indicating Compliance: Issuance of building permits

14-2 Prior to plan check review, the Project Applicant shall consult with the Los Angeles Fire Department regarding the installation of public and/or private fire hydrants, sprinklers, access,

and/or other fire protection features within the Project. All required fire protection features shall be installed to the satisfaction of the Los Angeles Fire Department.

Enforcement Agency: Los Angeles Fire Department
Monitoring Agency: Los Angeles Fire Department
Monitoring Phase: Pre-construction
Monitoring Frequency: Once, at plan check
Action Indicating Compliance: Issuance of building permits

14-3 Public Services (Police – Demolition/Construction Sites)

- Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspections during construction
Action Indicating Compliance: Field inspection sign-off

14-4 Public Services (Police – Demolition/Construction Sites)

- The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once, at plan check
Action Indicating Compliance: Issuance of building permits

15. RECREATION

No mitigation measures are necessary.

16. TRANSPORTATION AND TRAFFIC

16-1 Transportation/Traffic

- A Construction work site traffic control plan shall be submitted to DOT for review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction related traffic shall be restricted to off-peak hours.
- All delivery truck loading and unloading shall take place on site.
- The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.
- Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

Enforcement Agency: Los Angeles Department of Building and Safety, and Los Angeles Department of Transportation
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during construction
Action Indicating Compliance: Field inspection sign-off

17. UTILITIES AND SERVICE SYSTEMS

17-1 Utilities (Local Water Supplies - Landscaping)

- In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:
    - Weather-based irrigation controller with rain shutoff
    - Matched precipitation (flow) rates for sprinkler heads
    - Drip/microspray/subsurface irrigation where appropriate
    - Minimum irrigation system distribution uniformity of 75 percent
    - Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials

- Use of landscape contouring to minimize precipitation runoff

- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for existing and expanded irrigated landscape areas totaling 5,000 square feet and greater.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once, at plan check
Action Indicating Compliance: Issuance of building permits

17-2 Utilities (Local Water Supplies - All New Construction)

- If conditions dictate pursuant to the LAMC, the Department of Water and Power may postpone new water connections for this project until water supply capacity is adequate.
- Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate.
- Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.
- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for all landscape irrigation uses.
- Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once, at plan check
Action Indicating Compliance: Issuance of building permits

17-3 Utilities (Local Water Supplies - New Commercial or Industrial)

- All commercial restroom faucets shall be of a self-closing design.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once, at plan check
Action Indicating Compliance: Issuance of building permits

17-4 Utilities (Local Water Supplies - New Residential)

- Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.
- Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the Applicant shall be responsible for ensuring compliance.
- Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the Applicant shall be responsible for ensuring compliance.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once, at plan check
Action Indicating Compliance: Issuance of building permits

18. MANDATORY FINDINGS OF SIGNIFICANCE

No mitigation measures are necessary.

EXHIBIT D

Project consistency with Applicable Objectives and Police of the Framework Element (Table 1)

July 18, 2017

Mr. Michael Sin
City of Los Angeles
Department of City Planning
Expedited Processing Section
200 North Spring Street, Room 621
Los Angeles, CA 90012

Re: REVISED TABLE 1 FOR RESPONSE 5.3 - RESPONSE TO COMMENTS ON THE INDUSTRIAL STREET LOFTS PROJECT (SCH#2017051065, ENV-2017-1676-SCEA, CPC-2013-2993-VZC-HD-MCUP-DB-SPR, AND VTTM No. 74112)

Dear Mr. Sin,

Attached for your consideration is a revised Table 1, Project Consistency with Applicable Objectives and Policies of the Framework Element, which is provided in Response 5.3 in the Response to Comments Letter we previously submitted to you on July 14, 2017. The amended Table 1, includes a revised consistency analysis that incorporates additional General Plan Framework Element policies that are applicable to the Proposed Project and are being provided as an amendment to our prior response for your consideration. Please call or e-mail me if you have any questions.

Sincerely,

Parker Environmental Consultants

Shane E. Parker

PARKER
ENVIRONMENTAL CONSULTANTS

REVISED TABLE 1 FOR RESPONSE 5.3 FROM THE RESPONSE TO COMMENTS ON THE INDUSTRIAL STREET LOFTS PROJECT

Table 1
Project Consistency with Applicable Objectives and Policies of the Framework Element

Objective / Policy	Project Consistency Analysis
Land Use Chapter - Distribution of Land	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	**Consistent.** The Proposed Project includes a mixed-use project with up to 344 live/work units, 7,458 square feet of leasing / amenity area, 24,744 square feet of creative office uses and resident production space, and 4,042 square feet of restaurant space. The proposed range of land uses would provide commercial uses to support businesses and persons residing in the Project Site area and new housing opportunities to support the area's thriving community of artists, entrepreneurs, and persons working in the creative industries. As such, the Proposed Project would contribute to a diversity of uses that would attract visitors and support existing and future local businesses and residents.
Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.	**Consistent.** As discussed in Section 18, Utilities and Service Systems, and Section 14, Public Services of the SCEA, the agencies that provide public services and utilities to the Project Site would have capacity to serve the Project.
Policy 3.1.3: Identify area for the establishment of new open space opportunities to serve the needs of existing and future residents. These opportunities may include a citywide linear network of parkland sand trails, neighborhood parks, and urban open spaces.	**Consistent.** The Proposed Project would include private residential open space for tenants, as well as publicly accessible open space, including plazas and a paseo connecting Industrial Street to Mill Street.
Policy 3.1.4: Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land Use Diagram and Table 3-1 (Land Use Standards and Typical Development Characteristics).	**Consistent.** The Proposed Project is located adjacent to the Artists-In-Residence District, which can be classified by a variety of industrial uses with intermixed mixed-use development. The Proposed Project would contribute to the mixed-use development base to support the existing community with live/work units and commercial space (including creative office, restaurant, and production space). The Proposed Project's mixed-use nature and density would be similar to other mixed-use properties in the Project Site vicinity, including the Toy Factory Lofts building, located at 1855 East Industrial Street, the National Biscuit Company Lofts building, located at 1850 Industrial Street. Additionally, the AMP Lofts project is currently under construction at 695 S. Santa Fe Avenue.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.	**Consistent.** The Proposed Project is located in a Transit Priority Area as defined by SB 743 and a High Quality Transit Area as defined by SCAG's 2016-2040 RTP/SCS. The Proposed Project includes a mixed-use development, which would place residents and commercial infrastructure in close proximity to public transit opportunities. As such, the Proposed Project would reduce vehicular trips and vehicle miles traveled, which in turn reduces air pollution. Therefore, the Proposed Project is consistent with this objective.

Policy 3.2.1: Provide a pattern of development consisting of distinct districts, centers, boulevards, and neighborhoods that are differentiated by their functional role, scale, and character. This shall be accomplished by considering factors such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations.	**Consistent.** The Proposed Project is located adjacent to the Artists-In-Residence District near Downtown Los Angeles. The Central City North Community Plan encourages the development of the thriving artists community. The Proposed Project would support the area's artists community by providing 344 live/work units and a mix of commercial space, including creative office, artist production space, and restaurant space. To the greatest extent permitted, artists will have a priority for the affordable units in the Proposed Project. As such, the Proposed Project would supplement the area with live/work housing and commercial opportunities, which would be geared towards the artist community. The Proposed Project would be similar to existing nearby residential and mixed-use buildings: the Toy Factory Lofts building, located at 1855 East Industrial Street, the National Biscuit Company Lofts building, located at 1850 Industrial Street.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**Consistent.** The Proposed Project would support pedestrian and bicycling activity by providing bicycle parking facilities to meet LAMC requirements and by providing a ground-floor courtyard and landscaped area with paths through the Project Site that would connect Industrial Street and Mill Street. Additionally, the Proposed Project's landscaping along the public rights-of-way (Industrial Street and Alameda Street), ground-floor commercial uses that front public rights-of-way and the proposed paseos would enhance the pedestrian experience. These features coupled with the Project Site's location near multiple public transit options would support active forms of transportation.
Policy: 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.	**Consistent.** The Proposed Project is located adjacent to the Artists-In-Residence District, which is characterized by a variety of mixed-use buildings and industrial uses. The Proposed Project would be similar to existing mixed-use buildings and residential buildings near the Project Site; such as the Toy Factory Lofts building, located at 1855 East Industrial Street, the National Biscuit Company Lofts building, located at 1850 Industrial Street. The Proposed Project would redevelop an underutilized site with live/work units and ground-floor commercial uses that would support the surrounding community and the thriving artist community.
Objective 3.3: Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.	**Consistent.** As detailed in the SCEA, the Proposed Project's population and employment growth would be well within SCAG's projections for the Los Angeles Sub-region, which serve as the basis for the General Plan Framework Element's demographics projections and planned provisions of transportation and utility infrastructure and public services. In addition, as discussed in SCEA Sections, 14, Public Services, and 18, Utilities and Service Systems, the agencies that provide services and utilities to the Project Site would have capacity to serve the Proposed Project.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods	**Consistent.** The Proposed Project is not located within an identified neighborhood district, community, regional, and downtown centers, as defined by the Framework Element. However, the Proposed Project is located adjacent to the Artists-In-Residence District as defined by the Central City North Community Plan, which defines the area as including a large population of artists with a thriving artist community and are not

and related districts.	necessary restricted to the identified boundaries. The Central City North Community Plan further states that the presence of artists is a distinct and integral part of the district. The Proposed Project would support the artist community by providing 344 live/work units, creative office space, production space, and restaurant space. Additionally, the Proposed Project includes 18 very low-income residential units. The Proposed Project's units and ground-floor commercial space would be geared towards artists and would support the area's commercial base. The Proposed Project is located in a Transit Priority Area as defined by SB 743 and a High Quality Transit Area as defined by SCAG's 2016-2040 RTP/SCS. The Project is well served by transit, and Metro is considering new transit stations for the Santa Ana and Purple Lines in the Project vicinity. Replacing an obsolete and underutilized industrial site with a vibrant mixed use development that can take advantage of transit will provide further support for locating new transit stations in the Arts District.
Policy 3.4.1: Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.	**Consistent.** The Proposed Project is not located in an existing stable residential neighborhood or lower-intensity commercial district. The Project vicinity is characterized by a mix or residential, commercial and industrial uses, and the Proposed Project will be consistent with these existing uses. The Proposed Project is located in a Transit Priority Area as defined by SB 743 and a High Quality Transit Area as defined by SCAG's 2016-2040 RTP/SCS. The Project is well served by transit, and Metro is considering new transit stations for the Santa Ana and Purple Lines in the Project vicinity. Replacing an obsolete and underutilized industrial site with a vibrant mixed use development that can take advantage of transit will provide further support for locating new transit stations in the Arts District. Moreover, the Proposed Project is located immediately adjacent to the Downtown Center identified in the General Plan Framework Element Land Use Diagram.
Land Use Chapter – Multi-Family Residential	
Objective 3.7: Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.	**Consistent.** The Proposed Project is located adjacent to the Artists-In-Residence District near downtown Los Angeles, which is characterized by a variety of mixed-use developments and industrial uses. The Proposed Project would add to the mixed-use base and support the artists-in-residence community. Further, as discussed in the SCEA sections 14, Public Services, and 18, Utilities and Service Systems, the Proposed Project is adequately served by existing public infrastructure and services.
Policy 3.7.1: Accommodate the development of multi-family residential units in areas designated in the community plans in accordance with Table 3-1 and Zoning Ordinance densities indicated in Table 3-3, with the density permitted for each parcel to be identified in the community plans.	**Consistent.** Upon approval of the proposed General Plan amendment, the Project site will be designated as Regional Center Commercial. Table 3-1 provides: "Regional Centers generally will fall within the range of floor area ratios from 1.5:1 to 6.0:1, characterized by six- to 20-stories (or higher) buildings. Some will only be commercially oriented; others will contain a mix of residential and commercial uses." The Proposed Project

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	would fall within this range of floor area ratios. As set forth on page V-76 of the SCEA, the Proposed Project will also be consistent with the residential density allowed under LAMC Section 12.22 A.18, which provides for an R5 density for mixed-use projects on sites designated as Regional Center.
Policy 3.7.4: Improve the quality of new multi-family dwelling units based on the standards in Chapter 5 Urban Form and Neighborhood Design Chapter of this Element.	**Consistent.** As set forth below, the Proposed Project would be consistent with the standards in Chapter 5 Urban Form and Neighborhood Design Chapter of the Framework Element.
Policy 3.8.4: Enhance pedestrian activity by the design and siting of structures.	**Consistent.** The Proposed Project would enhance pedestrian activity by including active uses on the ground floor, publicly accessible plazas, and a pedestrian paseo connecting Industrial Street to Mill Street.
Policy 3.10.4: Provide for the development of public streetscape improvements, where appropriate.	**Consistent.** The Proposed Project will provide improved sidewalks.
Land Use Chapter – General Commercial Areas	
Objective 3.12: Generally, maintain the uses, density, and character of existing low-intensity commercial districts whose functions serve surrounding neighborhoods and/or are precluded from intensification due to their physical characteristics.	**Consistent.** The Proposed Project is not located in an existing low-intensity commercial district. The Project vicinity is characterized by a mix or residential, commercial and industrial uses,. While the buildings immediately surrounding the Project Site range between one and two stories, a number of taller buildings exist in the Project Site vicinity, including the seven-story building located at 747 Alameda Street (approximately 430 feet southwest of the Project Site), the six-story Toy Factory Building, located at 1855 E. Industrial Street (approximately 970 feet east from the proposed building), and the seven-story Biscuit Company Lofts building located at 1850 Industrial Street (approximately 1,000 feet east from the proposed building). As such, the Proposed Project's seven stories would not be out of character with the surrounding community. Moreover, the Project's floor area ratio (FAR) is consistent with the existing development in the area, including Toy Factory Lofts (1855 Industrial Street; 5.88 FAR), Biscuit Company Lofts (1850 Industrial Street; 5.2 FAR), Lofts (837 E. Traction; 3.41 FAR); Americano Building (923 E. 3rd Street; 3.39 FAR), The Walnut (1745 E. 7th Street; 3.33 FAR), 800 E. Traction (3.32 FAR), Barker Block (530 S. Hewitt Street; 3.16 FAR), Brick Lofts (652 Mateo Street; 2.99 FAR), and AMP LOFTS (695 Santa Fe Avenue; 2.99 FAR)
Land Use Chapter - Industrial	
Objective 3.14: Provide land and supporting services for the retention of existing and attraction of new industries.	**Consistent.** As previously discussed, the Proposed Project would develop live/work units and commercial space on a property that is currently designated for industrial land uses. Although the Proposed Project is not consistent with the existing M3 zoning designation, the Project is seeking a zone change to C2-2D-RIO, which supports the growing and maturing live/work community in the Project vicinity. Like many of the surrounding properties, the former cold storage business on the project site was not economically viable and went out of business, demonstrating that a mix of uses is more appropriate for the project area, which is rapidly transitioning from its former industrial base. As proposed, the mix of live/work units, creative office and restaurant land uses would support the existing artist community and industrial community by providing housing

	opportunities in close proximity to job opportunities, supporting infrastructure, and services. Additionally, the Proposed Project's units would be live/work units, which would further provide production space for the area's artists, entrepreneurs, and persons working in the creative industries. Further, the Proposed Project would provide creative office space, production space, and restaurant space, which would provide infrastructure for the artists community and industrial community and additional job opportunities. Moreover, the Project's creative office space will provide opportunities for the smaller businesses that support Warner Music, which is relocating from Burbank to 777 Santa Fe Avenue, and allow these uses to also relocate and remain in close proximity to Warner Music.
Policy 3.14.1: Accommodate the development of industrial uses in areas designated as "Industrial-Light," "Industrial-Heavy," and "Industrial-Transit" in accordance with Tables 3-1 and 3-9. The range and intensities of uses permitted in any area shall be determined by the community plans.	**Consistent.** As discussed under Objective 3.14, the Artists-in-Residence District is transforming from its former industrial base to include a mix of industrial, manufacturing, live/work, and commercial uses. The Proposed Project includes a mix of live/work units, creative office, production space, and restaurant land uses that would support the existing artist community and industrial community and would be consistent with existing mixed-use and multi-family residential properties in the Project Site area.
Policy 3.14.5: Promote the development of a mix of commercial and light industrial uses in areas designated as Industrial-Transit.	**Consistent.** Table 3-1 "Land Use Standards and Typical Development Characteristics" within the Framework Element identifies characteristics of Industrial-Transit, which include: (1) Industrial uses with higher levels of employment that would benefit from proximity to public transit; (2) Increased range of commercial uses that support industrial uses (through zone amendments). As such, the Proposed Project would incorporate a mix of commercial and production space. The Proposed Project would include a mixed-use building that would contain 344 live/work units, production space, creative office, and restaurant uses. These uses would support the existing industrial community and artist community. In addition, the Proposed Project includes a zone change to C2-2D-RIO, which is consistent with an "Industrial-Transit" area, as defined by the Framework Element.
Policy 3.14.6: Consider the potential re-designation of marginal industrial lands for alternative uses by amending the community plans based on the following criteria: a. Where it can be demonstrated that the existing parcelization precludes effective use for industrial or supporting functions and where there is no available method to assemble parcels into a unified site that will support viable industrial development; b. Where the size and/or the configuration of assembled parcels are insufficient to accommodate viable industrial development; c. Where the size, use, and/or configuration of the industrial parcels adversely impact adjacent residential neighborhoods;	**Consistent.** The Project Site is located adjacent to the Artists-In-Residence District as identified by the City Center North Community Plan. The Artists-In-Residence District is a artist community, and the Community Plan encourages the continued and expanded development of the artists-in-residence community. The Community Plan contains several policies to support the existing artists-in-residence community, (including Objective 3-2, Policy 3-2.1, and Policy 18-1.1). While the Project Site area is generally zoned for heavy industrial uses, the area is growing with housing opportunities, support services, and production space for the local artist community. Existing examples include: the Toy Factory Lofts building, located at 1855 East Industrial Street, the National Biscuit Company Lofts building, located at 1850 Industrial Street. Additionally, the AMP Lofts project is currently under construction at 695 S. Santa Fe Avenue.

d. Where available infrastructure is inadequate and improvements are economically infeasible to support the needs of industrial uses; e. Where the conversion of industrial lands to an alternative use will not create a fragmented pattern of development and reduce the integrity and viability of existing industrial areas; f. Where the conversion of industrial lands to an alternative use will not result in an adverse impact on adjacent residential neighborhoods, commercial districts, or other land uses; g. Where it can be demonstrated that the reduction of industrial lands will not adversely impact the City's ability to accommodate sufficient industrial uses to provide jobs for the City's residents or incur adverse fiscal impacts; and/or h. Where existing industrial uses constitute a hazard to adjacent residential or natural areas.	The Proposed Project includes the development of a mixed-use project with 344 live/work units, creative office space, production space, and restaurant space, which would be provided to support the local artist community. As part of the Proposed Project, the Proposed Project includes a zone change from M3-1-RIO to C2-2D-RIO and a general plan amendment to amend the existing on-site designation Heavy Manufacturing to Regional Center Commercial. The Proposed Project's residential and commercial components would increase the housing opportunities for existing and future residents, including employees in existing office uses in the area, such as Warner Music provide arts production space , increase employment opportunities in the Project's creative office uses, restaurants, and live/work units, and support the vitality of the Artists-In-Residence District. Moreover, the Project site is not viable for industrial use, as evidenced by the failure of the former cold storage business on the site. In addition, the Proposed Project will generate additional revenues to the City in the form of new sales taxes, increased property taxes, and business license fees on an underutilized site with a vacant building. Therefore, the Proposed Project is not expected to adversely impact on adjacent residential neighborhoods, commercial districts, or other land uses or industrial lands. While, the Proposed Project would change the existing zone on-site, the Proposed Project is consistent with City goals for continued development in the area and similar to the existing development in the Artists-In-Residence District. As such, the Proposed Project would contribute to the community and not create a fragmented pattern of development.
Housing Chapter	
Objective 4.1: Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion.	**Consistent.** The proposed zone/height district change and General Plan amendment will act as an incentive to provide needed housing, including affordable housing.
Policy 4.1.6: Create incentives and give priorities in permit processing for low- and very-low income housing developments throughout the City.	**Consistent.** The proposed zone/height district change and General Plan amendment will act as an incentive to provide needed housing, including affordable housing.
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	**Consistent.** The Proposed Project would provide 344 live/work units within a Transit Priority Area and a High Quality Transit Area. The Proposed Project would support this objective.
Policy 4.2.1: Offer incentives to include housing for very low- and low-income households in mixed-use developments.	**Consistent.** The proposed zone/height district change and General Plan amendment will act as an incentive to provide needed housing, including affordable housing.
Urban Form and Neighborhood Design	
Goal 5A: A livable City for existing and future residents and one that is attractive to future	**Consistent.** The Proposed Project, which will include a mix of residential live/work and commercial uses, will support and build upon the

investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and Citywide scales.	surrounding areas transition from a underutilized mostly industrial area to a thriving complete neighborhood where people can live, work, and play.
Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.	**Consistent.** The Proposed Project would enhance pedestrian activity by including active uses on the ground floor, publicly accessible plazas, and a pedestrian paseo connecting Industrial Street to Mill Street. It would also improve existing sidewalks.
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	**Consistent.** The Proposed Project would improve the existing sidewalks and add "eyes on the street" in the form of active ground floor uses and upper level live/work to improve safety.
Open Space and Conservation	
Policy 6.3.3: Utilize development standards to promote development of public open space that is visible, thereby helping to keep such spaces and facilities as safe as possible	**Consistent.** The Proposed Project would include private residential open space for tenants, as well as publicly accessible open space, including plazas and a paseo connecting Industrial Street to Mill Street.
Policy 6.4.8: Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods.	**Consistent.** The Proposed Project would include private residential open space for tenants, as well as publicly accessible open space, including plazas and a paseo connecting Industrial Street to Mill Street.
Economic Development	
Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.	**Consistent.** The Proposed Project's integration of live/work units and commercial space, including restaurant and creative office space, would balance the development of new jobs and housing that is supportive of the surrounding community and the artists-in-residence community (as discussed in the Central City North Community Plan and outlined above). Further, the Proposed Project would provide 18 affordable housing units reserved for very low income tenants. The Proposed Project's mix of commercial uses and live/work units would sustain economic growth and local residents' needs. The Proposed Project would be well-designed and would comply to the LAMC, LA Green Building Code, and applicable plans and regulations (including but not limited to the Central City North Community Plan and the RIO Ordinance) to ensure environmental quality. As demonstrated by the SCEA, the Proposed Project would not result in any significant environmental impacts.
Policy 7.2.2: Concentrate commercial development entitlements in areas best able to support them, including community and regional centers, transit stations, and mixed-use corridors. This concentration prevents commercial development from encroaching on existing residential neighborhoods.	**Consistent.** The Proposed Project's commercial uses will be located on a site that is well served by transit, and the Project will include a mix of uses. The Project site is not located in the vicinity of an existing residential neighborhood and will therefore not encroach on an existing residential neighborhood.
Policy 7.2.3: Encourage new commercial development in proximity to rail and bus transit	**Consistent.** The Proposed Project would place 28,816 square feet of commercial square footage near multiple transit opportunities. The Project

corridors and stations.	Site is located less than one-half mile from the intersection of two major bus lines, 18 and 720 Metro, with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Proposed Project is located in Transit Priority Area as defined by SB 743 and a High Quality Transit Area as defined by SCAG's 2016-2040 RTP/SCS. The Proposed Project would support this policy.
Policy 7.2.4: Ensure that the City has enough capacity to accommodate the development of general commercial uses which support community needs in all parts of Los Angeles.	**Consistent.** The Proposed Project would place 28,816 square feet of commercial square footage and 344 live/work units in an area that is well serviced by existing public services and utilities, as discussed in SCEA sections 14, Public Services, and 18, Utilities and Service Systems.
Policy 7.2.5: Promote and encourage the development of retail facilities appropriate to serve the shopping needs of the local population when planning new residential neighborhoods or major residential developments.	**Consistent.** The Project Site is located adjacent to the Artists-In-Residence District of the Central City North Community Plan Area. The Proposed Project would include commercial space (including creative office, restaurant, and production space) and live/work units, which would support the local populations, including the artists' community.
Policy 7.6.3: Facilitate the inclusion of shopping facilities in mixed-use developments that serve the needs of local residents and workers. If necessary, consider utilizing financing techniques such as land write-downs and density bonuses.	**Consistent.** The Proposed Project includes a mixed-use development with ground-floor commercial space and 344 live/work units. The Proposed Project would include restaurant uses and artist production space to meet the needs of local residents and workers, including artists.
Objective 7.9: Ensure that the available range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City's work force to both live and work in the City.	**Consistent.** The Proposed Project would include 344 live/work, which includes a mix of studio, one-bedroom, and two-bedroom units. In addition, the Proposed Project would reserve 18 units as very low income units. As such, the Proposed Project would provide a variety of housing options. Further, the Proposed Project is located within a Transit Priority Area and a High Quality Transit Area. All of the units will be live/work units, which will allow residents to both live and work in their units. The Proposed Project's commercial component and location would provide existing residents additional services and provide future residents convenient access to local services and transit opportunities. The Proposed Project would support this objective.
Source: City of Los Angeles Department of City Planning, Framework Element, July 1995.	