DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

City Planning Commission

Date: November 14, 2019
Time: After 8:30 a.m.*
Place: Los Angeles City Council Chamber, Room 340
200 North Spring Street,
Los Angeles, CA 90012

Public Hearing: April 17, 2019
Appeal Status: General Plan Amendment not appealable. Zone Change and Height District Change are appealable to City Council by Applicant if disapproved in whole or in part. Site Plan Review appealable to City Council by any party.
Expiration Date: November 14, 2019

Case No.: CPC-2016-3479-GPA-VZC-HD-SPR
CEQA No.: ENV-2016-3480-EIR
SCH. No. 2017031007
Related Cases: VTT-74564-1A
Council No.: 14 - Huizar
Plan Area: Central City North
Plan Overlay: None
Certified NC: Downtown Los Angeles
Land Use: *Existing:* Heavy Industrial
Proposed: Commercial Industrial
Zone: *Existing:* M3-1-RIO
Proposed: CM-2-RIO

Applicant: Bay Capital Fund, LLC
Representative: Craig Lawson & Co., LLC (Jim Ries)

PROJECT LOCATION: 2110 and 2130 East Bay Street, 2141 East Sacramento Street

PROPOSED PROJECT: The Project proposes a new residential and commercial development consisting of 110 live-work units, reserving 11 percent of the total units for restricted affordable units, 113,350 square feet of creative office, 50,848 square feet of new commercial space (that may include retail and/or restaurant floor area), and 8,114 square feet of covered ancillary space. The Project would consist of three buildings built on top of three levels of subterranean parking containing 479 parking spaces. A six-story office building would be located on the eastern half of the site while the remaining western half contains an approximately 30-foot tall existing warehouse shed that will be adaptively reused and incorporated as part of the two-level retail component fronting Bay Street. An 11-story structure fronting Sacramento Street would contain the Live-Work Units. The maximum building height would be 139 feet and the proposed 287,137 square feet of floor area generates an FAR of 3.9:1. A 4,000 square-foot manufacturing building and surface parking lot would be demolished to accommodate the proposed development.

REQUESTED ACTIONS:

ENV-2016-3480-EIR

1. Pursuant to Section 21082.1(c)(3) of the California Public Resources Code, the consideration and certification of the Environmental Impact Report (EIR), ENV-2016-3480-EIR, SCH No. 2017031007, for the above-referenced project, and adoption of the Statement of Overriding Considerations setting forth the reason and benefits of adopting the EIR with full knowledge that significant impacts may remain;
2. Pursuant to Section 21081.6 of the California Public Resources Code, the adoption of the proposed Mitigation Measures and Mitigation Monitoring Program;

3. Pursuant to Section 21081 of the California Public Resources Code, the adoption of the required Findings for the certification of the EIR;

CPC-2016-3479-GPA-VZC-HD-SPR

4. Pursuant to Section 555 of the City Charter and Section 11.5.6 of the Municipal Code, a **General Plan Amendment** to the Central City North Community Plan to change the Land Use Designation of the site project site from 'Heavy Industrial' to 'Commercial Industrial' land use; and the deletion of Community Plan Footnotes 1 (Height District No. 1) and 6 (for properties designated on zoning maps as Height District Nos. 1, 1L, 1VL, or 1XL (or their equivalent), development exceeding a floor area ratio of 1.5:1 up to 3:1 may be permitted through a zone change height district change procedure, including an environmental clearance) from the Industrial land use category to accommodate a "2" Height District in the CM Zone;

5. Pursuant to Section 12.32 of the Municipal Code, a **Vesting Zone Change and Height District Change** from M3-1-RIO (Heavy Industrial, Height District 1 within the River Improvement Overlay) to CM-2-RIO (Commercial Manufacturing Zone, Height District 2 within the River Improvement Overlay); and

6. Pursuant to LAMC 16.05, **a Site Plan Review** for a project which creates, or results in an increase of 50 or more dwelling units and/or an increase of 50,000 gross square feet of non-residential floor area.

RECOMMENDED ACTIONS:

ENV-2016-3480-EIR

If the City Planning Commission denies the appeal of the Vesting Tentative Tract Map (VTT-74564-1A) and sustains the actions of the Advisory Agency:

7. **FIND,** based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in the previously certified Bay Street Mixed-Use Project Environmental Impact Report (EIR), which includes the Draft EIR, No. ENV-2016-3480-EIR (SCH No. 2017031007) dated November 8, 2108, the Final EIR, dated April 2, 2019, and the Errata, dated August 2018, certified on April 26, 2019; and pursuant to CEQA Guidelines, Sections 15162 and 15164, no subsequent EIR or addendum is required for approval of the project;

   OR

   If the City Planning Commission grants the appeal of the Vesting Tentative Tract Map (VTT-73568-1A) and denies the tract map:

   FIND the City Planning Commission has reviewed and considered the information contained in the Environmental Impact Report prepared for this project, which includes the Draft EIR, No. ENV-2016-3480-EIR (SCH No. 2017031007) dated, November 8, 2018, the Final EIR, dated April 2, 2019 and Errata, dated August 2018 (2110 Bay Street Mixed-Use Project EIR), as well as the whole of the administrative record, and

   CERTIFY that:
   a. The 2110 Bay Street Mixed-Use Project EIR has been completed in compliance with the California Environmental Quality Act (CEQA);
   b. The 2110 Bay Street Mixed-Use Project EIR was presented to the City Planning Commission as a decision-making body of the lead agency and the decisionmaking body reviewed and considered the information contained in the 2110 Bay Street EIR prior to approving the project; and

c. The 2110 Bay Street Mixed-Use Project EIR reflects the independent judgment and analysis of the lead agency.

ADOPT the following:

a. The related and prepared 2110 Bay Street Mixed-Use Project Environmental Findings;
b. The Statement of Overriding Considerations;
c. The Mitigation Monitoring Program prepared for the 2110 Bay Street Mixed-Use Project EIR.

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

Advise the applicant that pursuant to State Fish and Game Code Section 711.4, a Fish and Game Fee and/or Certificate of Fee Exemption may be required to be submitted to the County Clerk prior to or concurrent with the Environmental Notice of Determination ("NOD") filing.

CPC-2016-3479-GPA-VZC-HD-SPR

8. **Recommend** that the Mayor and City Council approve a **General Plan Amendment** to the Central City North Community Plan to change the Land Use Designation of the site project site from 'Heavy Industrial' to 'Commercial Industrial' land use;
9. **Recommend** that the City Council approve a **Vesting Zone Change and Height District Change** from M3-1-RIO to (T)(Q)CM-2-RIO;
10. **Approve** a **Site Plan Review** for a development project that creates 50 or more dwelling units and/or 50,000 gross square feet of non-residential floor area;
11. **Adopt** the attached Findings;
12. **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
13. **Advise** the applicant that pursuant to State Fish and Game Code Section 711.4, a Fish and Game Fee and/or Certificate of Fee Exemption may be required to be submitted to the County Clerk prior to or concurrent with the Environmental Notice of Determination ("NOD") filing.

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(213) 473-9985

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, 200 North Spring Street, Room 272, 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 this 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.

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B – Land Use and Zoning Maps

C – Mitigation Monitoring Program

D – LADOT Approval Letter

E – Industrial Land Use Policy Land Use Survey Maps

Environmental Impact Report link:

https://planning.lacity.org/eir/2110_Bay_Street/deir/DEIR%202110%20Bay%20Street%20Mixed%20Use%20Project.html

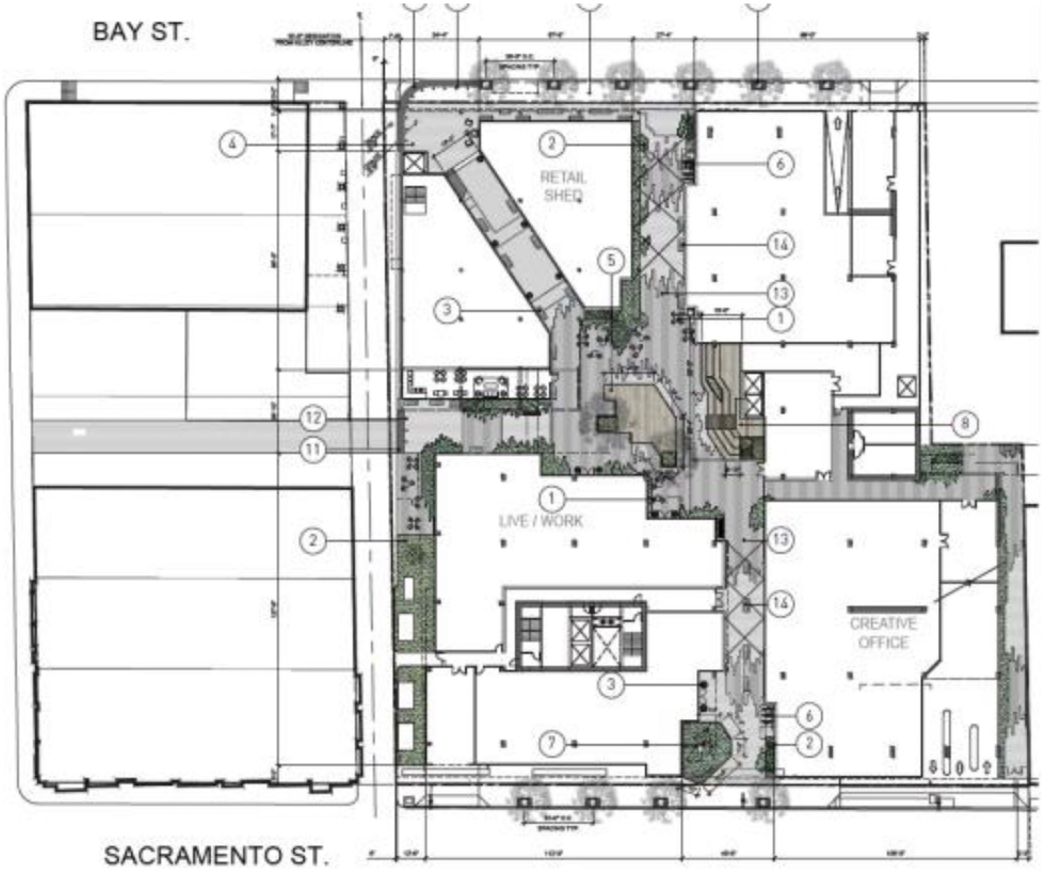
PROJECT ANALYSIS

Project Summary

The Project proposes a new residential and commercial development including 110 live-work units, including 11 percent of the units reserved for affordable units, and 113,350 square feet of creative office, 50,848 square feet of new commercial space (that may include retail and/or restaurant floor area) and 8,114 square feet of covered ancillary space. The Project would consist of three buildings built on top of three levels of subterranean parking containing 479 parking spaces. A 6-story office building would be located on the eastern half of the site while the remaining western half contains an approximately 30-foot tall existing shed that will be adaptively reused as part of the two-level retail component fronting Bay Street. An 11-story structure fronting Sacramento Street would contain the Live-Work Units. The maximum building height is 149 feet (including the elevator tower) and its proposed 287,137 square feet of floor area generates a FAR of 3.9:1.

The Project is located midblock between Bay Street to the north, Sacramento Street to the south and east of Santa Fe Avenue and consists of 1.78 acres or 77,423 square feet. It is to be noted that this site is a half mile south of the Artists in Residence District and a block and one half from the Los Angeles River.

As seen in the site plan below, each of the buildings is designed with ground floor commercial (retail) fronting not only on Bay and Sacramento streets, but also along the Project's internal central courtyard. The central courtyard is planned with pedestrian connections to the surrounding streets. Within the site's northwestern corner, the Project will adaptively reuse an existing approximately 30-foot tall shed structure by creating an approximately 17-foot-tall single-story structure with a roof top open space element under the reconstructed shed. This building's first floor is planned for retail uses while its roof top open space element, below the shed structure, could be used for resident, employee, patron or community activities. The Project's eastern half of the site from Sacramento to Bay streets will be developed with a seven-story building containing approximately 113,350 square feet of creative offices space and a small restaurant space on the top floor. This building is designed with numerous exterior terrace elements available to future tenants providing outdoor working areas or passive recreation areas all with views of downtown or the Los Angeles River. The 11-story live-work building fills the southwestern portion of the site and contains up to 110 live-work units, amenity spaces and 2nd level publicly accessible gym. The average unit size is 947 square feet. The Project will reserve 11% of the units for Very Low Income Households. Resident amenities include a large roof top deck with pool, a club house, a shared art space and private balconies and decks.



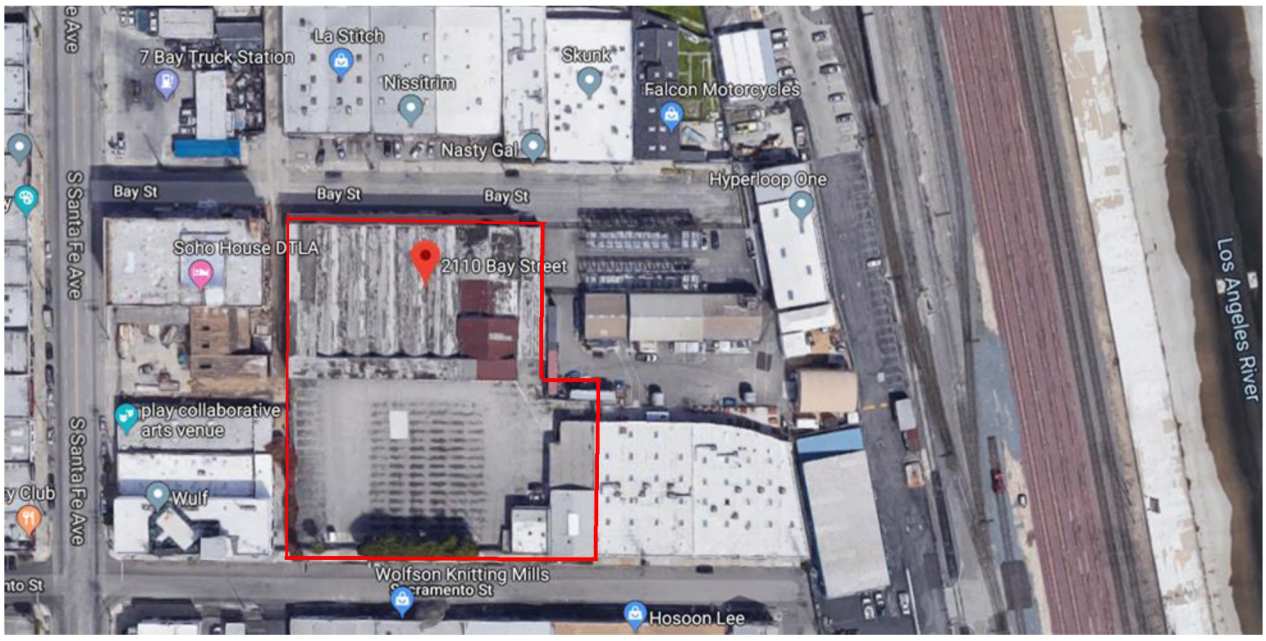
Provision is made for 479 automobiles and 180 bicycle parking spaces in an enclosed multilevel below grade garage. Vehicular access to the Project would be from a two-way driveway located on Sacramento Street and a one-way exit ramp on Bay Street. Pedestrian access will be provided from Bay Street, Sacramento Street and the alley located on the Project's western boundary. In preliminary discussions with the adjacent property owner, plans are being made to continue this alley connection through to Santa Fe Street.

Background

Location and Setting

The project site is located at 2110 Bay Street, 2130 Bay Street, and 2141 Sacramento Street in the Arts District neighborhood of the City of Los Angeles. The project site is located in the Central City North Community Plan Area adjacent to the Los Angeles River, approximately 0.13 miles from the Santa Monica (US-10) Freeway. The project site has a Heavy Industrial land use designation and is zoned M3-1-RIO. The project site is not within a hillside area, or a liquefaction zone. The project site is not within a Methane Zone. The project site is located in the East Los Angeles State Enterprise Zone, the Central Industrial Redevelopment Project Area, and a Transit Priority Area pursuant to Public Resources Code Section 21099(d). The property is located in the southeasterly portion of the Central City North Community Plan area, east of Santa Fe Avenue between Bay Street and Sacramento Street. The project is near the Arts District neighborhood which was originally planned and zoned for industrial uses. However, the neighborhood has been evolving into a unique district that includes industrial uses, live-work units, commercial and retail uses, and mixed-use developments. Through the historic granting of Zoning Administrator's Determinations on adjacent properties, many of the formerly industrial buildings within proximity of the subject site have been converted into commercial and live-work uses.

The Subject Property, as pictured below, is a relatively flat, rectangular-shaped 1.78 acre site, comprised of three parcels that, when combined, are approximately 1.78 net acres in size (approximately 75,736 square feet) located just outside the boundaries, or half a mile south of the Artists-in-Residence District neighborhood of the Central City North Community Plan area. The site is bounded to the north by Bay Street, to the east by adjacent development, with the Los Angeles River approximately 0.12 miles east, to the south by Sacramento Street, and the west by an unnamed alley, with Santa Fe Avenue farther to the west. The subject property's westerly boundary is an approximately 300-foot frontage along an unnamed alley, its northern boundary in an approximately 237-foot frontage along Bay Street, its eastern boundary is an approximately 300-foot property line shared with adjacent development, and its southern boundary is an approximately 278-foot frontage along Sacramento Street. The subject property is legally described as Lots 1, 3, 4 and a portion of lot 2, Tract No. 14463, in the City of Los Angeles, County of Los Angeles, State of California, as per map recorded in book 318 pages 34-35 of maps in the County Recorder of Los Angeles.



Adjacent Uses

The surrounding urban environment is predominantly developed with newly constructed mixed-use live-work and office developments, older industrial buildings that have been converted into live-work dwelling units, restaurants, and industrial uses.

- North: The property located to the north of the project site across Bay Street, are multiple one-story buildings, zoned M3-1-RIO. The uses include manufacturing, office, and Joint Living Work Quarter units.

- West: Directly adjacent to the Site is an unnamed alley, with additional development fronting Santa Fe Avenue. This development includes a three-story warehouse/manufacturing building that operates several film and photography studios (1026 Santa Fe), several one-story buildings used for manufacturing and office uses (1018-1022 Santa Fe), and a six-story warehouse/industrial building that is being renovated to include restaurant and bar, event space, hotel rooms, film screening room, (1000 Santa Fe). The area is zoned M3-1-RIO.

- South: Immediately south of the project site, across Sacramento Street, are multiple one-story warehouse and manufacturing buildings, zoned M3-1-RIO.

- East: Directly adjacent to the Site are several one-story buildings (2161 Sacramento Street, 2136 Bay Street) developed with commercial office uses. The area is zoned M3-1-RIO. The property located to the northwest of the project site, across Santa Fe Avenue within the M3-1-RIO Zone, is the newly constructed Santa Fe Business Center (four stories, 777 S. Santa Fe Ave) containing 75,000 square feet of new office space..

Streets and Circulation

Bay Street is a designated Collector Street in Mobility Plan 2035 with a right-of-way width of 66 feet, and is an unimproved street along the project site's North street frontage. Bay Street is a two-way street with no parking permitted. The Bureau of Engineering required that a 3-foot wide strip of land be dedicated along Bay Street adjoining the tract to complete a 33-foot wide half right-of-way in accordance with Collector Street standards of LA Mobility Plan.

Sacramento Street is a designated Collector Street in Mobility Plan 2035 with a right-of-way width of 66 feet, and is improved with a gutter, curb, and sidewalk along the project site's South street frontage. Sacramento Street is a two-way street with parking permitted on the north side of the street. The Bureau of Engineering required that a 3-foot wide strip of land be dedicated along Sacramento Street adjoining the tract to complete a 33-foot wide half right-of-way in accordance with Collector Street standards of LA Mobility Plan.

There is an unnamed alley located to the west of the project site. Bureau of Engineering is requesting a 0.5-foot dedication and new full-width alley with 2-foot wide longitudinal gutter along the unnamed alley under a CM zone.

Freeway Access

Regional access to the Project Site is provided by the I-10 freeways. The Santa Monica Freeway (I-10) extends eastward from its origin in the City of Santa Monica, past the Project study area and across the country as a main southern east-west interstate. The Santa Monica Freeway is located approximately 1000 feet south of the Project site and provides convenient access to the Golden State/Santa Ana Freeway (I-5), the Hollywood Freeway (US-101) and the Harbor Freeway (SR-110).

Public Transit

The following provides a brief description of the bus lines providing service in the Project vicinity:

Metro Local 18 – Route 18 is a local line that travels from Wilshire Center to Montebello through downtown Los Angeles via 6th Street and Whittier Boulevard, with average headways of approximately 10 to 15 minutes during the morning and afternoon peak hours. It provides service to East Los Angeles, Boyle Heights, and Westlake. This line travels along 6 th Street in the vicinity of the Project Site.
Metro Local 30 – Route 30 is a local line that travels from East Los Angeles to West Hollywood through downtown Los Angeles via San Vicente Boulevard, Pico Boulevard, and 1st Street, with average headways of approximately 30 to 35 minutes during the morning and afternoon peak hours. It provides service to Boyle Heights and Mid-City. This line travels along 1st Street in the vicinity of the Project Site.
Metro Local 53 – Route 53 is a local line that travels from downtown Los Angeles to California State University, Dominguez Hills via Central Avenue, with average headways of approximately

10 to 15 minutes during the morning and afternoon peak hours. It provides service to South Los Angeles, Willowbrook, and Compton. This line travels along 6th Street and Central Avenue in the vicinity of the Project Site.

Metro Local 60 – Route 60 is a local line that travels from downtown Los Angeles to the Artesia Station via Long Beach Boulevard, with average headways of approximately 10 minutes during the morning and afternoon peak hours. It provides service to Vernon, Lynwood, and Compton. The line travels along 7 th Street and Santa Fe Avenue in the vicinity of the Project Site.

Metro Local 62 – Route 62 is a local line that travels from downtown Los Angeles to Hawaiian Gardens via Telegraph Road, with average headways of approximately 25 to 30 minutes during the morning and afternoon peak hours. It provides service to East Los Angeles, Santa Fe Springs, and Norwalk. The line travels along 7 th Street and Boyle Avenue in the vicinity of the Project Site.

Metro Local 66 – Route 66 is a local line that travels from Wilshire Center to Montebello through downtown Los Angeles via 8 th Street and Olympic Boulevard, with average headways of approximately 15 to 20 minutes during the morning and afternoon peak hours. It provides service to Boyle Heights, East Los Angeles, and City of Commerce. This line travels along Olympic Boulevard in the vicinity of the Project Site.

Metro Local 106 – Route 106 is a local line that travels from the East Los Angeles College Transit Center to Los Angeles County + USC Medical Center (LAC+USC) via State Street, Whittier Boulevard, and 1st Street, with average headways of 60 minutes during the morning and afternoon peak hours. It provides service to Boyle Heights, East Los Angles, and Monterey Park. The line travels along Boyle Avenue in the vicinity of the Project Site.

Metro Local 251 – Route 251 is a local line that travels from Cypress Park to Lynwood via Soto Street, with average headways of approximately 15 to 20 minutes during the morning and afternoon peak hours. It provides service to Cypress Park, Vernon, and Huntington Park. The line travels along Soto Street in the vicinity of the Project Site.

Metro Shuttle 605 – Route 605 is a shuttle that travels from LAC+USC to Olympic Boulevard, with average headways of approximately 15 to 20 minutes during the morning and afternoon peak hours. It provides service to Boyle Heights. The line travels along Soto Street in the vicinity of the Project Site.

Metro Rapid Line 720 – Route 720 is a rapid line that travels from Santa Monica to the Commerce Center via Wilshire Boulevard and Whittier Boulevard, with average headways of approximately 10 to 15 minutes during morning and afternoon peak hours. It provides service to downtown Los Angeles, Beverly Hills, and Century City. The line travels along 6th Street and 7th Street in the vicinity of the Project Site.

Metro Rapid Line 751 – Route 751 is a rapid line that travels from Huntington Park to Cypress Park via Soto Street, with average headways of approximately 15 to 20 minutes during the morning and afternoon peak hours. It provides service to Lincoln Heights, Boyle Heights, and Vernon. The line travels along Soto Street in the vicinity of the Project Site.

Metro Rapid Line 760 – Route 760 is a rapid line that travels from Long Beach Boulevard Green Line Station to downtown Los Angeles via Long Beach Boulevard, with average headways of approximately 15 to 20 minutes during the morning and afternoon peak hours. It provides service to Vernon, Huntington Park, and South Gate. The line travels along 7th Street and Santa Fe Avenue in the vicinity of the Project Site.

Montebello Bus Lines M40 – Route M40 is a local line that travels from downtown Los Angeles to Whittier through Montebello via Beverly Boulevard, with average headways of approximately 10 to 15 minutes during morning and afternoon peak hours. It provides service to East Los Angeles. The line travels along 4th Street in the vicinity of the Project Site.

Montebello Bus Lines M90 – Route M90 is an express line that travels from downtown Los Angeles to Whittier through Montebello via Beverly Boulevard, with average headways of approximately 20 to 30 minutes during the morning and afternoon peak hours. The line travels along 4th Street in the vicinity of the Project Site.

In addition to the bus lines that provide service within the Project vicinity, the Metro Gold Line operates within the Project Site vicinity approximately 1 mile north of the project. The Metro Gold Line runs between Azusa and East Los Angeles. The Metro Gold Line has connecting service to the Metro Red Line and Purple Line at Union Station, approximately 1.5 miles north of the Project Site.

Land Use Policies

Community Plan

The Project Site is located a half mile south of the southern boundary of the Artists-in-Residence District (more commonly referred to as the "Arts District"), which is bounded by First Street to the north, the Los Angeles River to the east, Sixth Street to the south, and Alameda Street to the west. The Project is located within the boundaries of the South Industrial Subarea as defined by the Central City North Community Plan. However, as stated in the Central City North Community Plan, Artists-in-Residence occupy a large area between the Santa Ana Freeway and the Santa Monica Freeway and between Alameda Street and the Los Angeles River, which includes the project site. On March 5, 2008, the City Council approved updating and expanding the geographical boundaries of the Arts District farther south in the Central City North Community Plan to include the areas south of 6th Street including Violet Street and the areas between Mill Street and Wilson Street to the west and the Los Angeles River to the east. This area located just outside the designated Artist-in-Residence District, is primarily made up of former warehouse structures that are transitioning into artists' studios and workshops, live-work spaces, and neighborhood-serving retail and commercial uses. The Artist in Residence District expansion was in response to the significant growth in mixed-use and commercial development south of 6th Street in recent years. Metro Red or Purple Line Stations are also being studied for this area at Santa Fe Avenue and 3rd Street and/or south of the new 6th Street Bridge pursuant to a motion made by the Metro Board on January 19, 2017. The Community Plan encourages the continued and expanded development of a thriving artists-in-residence community in the plan and proposed redevelopment areas.

The Community Plan recognizes a Special Boundary located within the Industrial South Subarea, known as the "Alameda East Redevelopment Study Area." The Special Boundary is bounded by Fourth and Fifth Streets on the north, the City boundary (25th Street) on the south, Alameda Street on the west, and the Los Angeles River on the east. The Community Plan recognizes that many deficiencies exist within the Alameda East study area, which makes the area less than desirable for "modern" industrial activity. These deficiencies include the physical condition of the streets, loading and unloading activities, and parking conditions. Other difficulties include poor design of intersections, the presence of dead end streets, and the lack of continuous north/south corridors. One of the Opportunities identified by the Community Plan for this Special Boundary was the adoption of the Alameda East Redevelopment Project which would have promoted artist-in-residence opportunities to an area north of Sixth Street, in the vicinity of the Project Site. While the Alameda East Redevelopment Project did not come to fruition, many of the deficient conditions of the area for Industrial uses as identified by the Community Plan continue to exist. Nonetheless, the surrounding area of the Project Site has evolved from its historic industrial and manufacturing uses to complimentary and compatible residential, creative office, and related retail/cultural/entertainment uses alongside industrial uses, reflecting larger employment and economic trends in the City.

The DTLA2040 Draft Plan envisions the area encompassing the Arts District as the Hybrid Industrial District, places that preserve productive activity and prioritize space for employment, including light industrial, new industry, commercial, and vertically integrated businesses, with careful introduction of live-work uses. The existing Artists-in-Residence District in the current community plan is not limited to its current boundaries, but rather the Central City North

Community plan encourages the continued and expanded development of a thriving artists-in-residence community in the plan and proposed redevelopment areas.

The existing land use designation for the Project Site in the Community Plan is Heavy Industrial. The Project Site is currently zoned M3-1-RIO (Heavy Industrial Zone, Height District 1, Los Angeles River Improvement Overlay District). Uses that are allowed in an M3 Zone include all of the uses allowed in the M1, M2, and MR2 zones and, as such, generally include those uses allowed in the C1, C1.5, and C2 zones (see LAMC Section 12.20[A][1]). Permitted uses include, among others: restaurants, business and professional offices, medical clinics and laboratories, grocery stores, retail and service stores, pharmacies, drugstores, manufacturing and industrial activities, research and development, storage, and parking. Buildings containing dwelling units or guest rooms are prohibited in the M3 Zone. The M3-1 Zone corresponds to Height District 1. Pursuant to LAMC Section 12.21.1(A)(1), Height District 1 allows a maximum floor area ratio (FAR) of 1.5:1 and does not limit the height of structures in M designated zones.

The Project includes a request for a General Plan Amendment to the Commercial Industrial and a Zone Change to the [T][Q]CM-2-RIO Zone over the entire site.

Industrial Land Use Policy (ILUP)

The Industrial Land Use Policy (ILUP) study was conducted by the Department of City Planning and CRA/LA staff to re-evaluate the viability of the City's industrial districts, particularly those areas experiencing the greatest pressure to convert to other uses – industrial districts located in the Central City, Central City North, Boyle Heights, South Los Angeles, Southeast Los Angeles, Hollywood, Wilshire and West Los Angeles Community Plan Areas, and the Adelante Eastside, Central Business District, Central Industrial, Chinatown, City Center, CD9 Corridors South of the Santa Monica Freeway, Hollywood and Wilshire Center-Koreatown Redevelopment Project Areas. The ILUP included extensive data analysis, evaluation of community input, and field surveys of these industrial areas. The City's *Industrial Land Use Policy Initiative*, issued in 2004 and 2005, was re-implemented in December 2007 with the release of the Department of City Planning's study, *Los Angeles' Industrial Land: Sustaining a Dynamic City Economy*.

The Industrial Land Use Policy (ILUP) does not preclude City Council approval of the recommended Zone Change and General Plan Amendment. With respect to the subject site, the ILUP's 2007 analysis no longer reflects the economic trends that have transformed land uses in the surrounding area, which has evolved to include numerous live-work and commercial developments. In fact, the draft DTLA2040 Plan better captures this transformation of the area and designates the project site as a Hybrid Industrial area, with a proposed FAR of 3:1 to 6:1, for creative office, live-work, manufacturing, and production activity, consistent with the Project. The ILUP, as it states, was meant to serve as a guidance document and not as required policy. The ILUP stated that if unique circumstances existed to approve a change of use or zone in an 'Employment Protection District' the findings for such determination under Policy 3.14.6 of the Framework Land Use Policies must be clearly articulated and the project should be required to incorporate community benefits. In this instance, findings have been made demonstrating the changing character of the district and the area's unique identity as an economic hub near mass transit and downtown, an employment hub, and in addition has established various community benefits, such as open space, infrastructure improvements, affordable housing, and job-producing space, that exceeds the amount recommended by the ILUP. Furthermore, the ILUP was never adopted by the City Council and in no way limits the City Council's ability to exercise its legislative authority to approve the recommended Zone Change and General Plan Amendment.

The City's Industrial Land Use Policy (ILUP) memo, published in January, 2008, identified the Project Site within an "Employment Protection Districts" - areas where industrial zoning should

be maintained, and where adopted General Plan, Community Plan and Redevelopment Plan industrial land use designations should continue to be implemented. Residential uses in these Districts were deemed not appropriate at the time. However as indicated in the *Economic Development* Chapter of the Framework Element, some existing industrially zoned lands may be inappropriate for new industries and should be converted for other land uses. Where such lands are to be converted, their appropriate use shall be the subject of future planning studies. This is satisfied in several ways.

First, the entire project approval process, including the CEQA process, the entitlement process, and the various points therein for public comment form a planning study themselves. The CEQA process included an Environmental Impact Report, which assessed the surrounding land uses, as well as an analysis of the proposed land use in relation to the General Plan and the LA CEQA Guidelines threshold for land use compatibility. The entitlement process further analyzed in detail the Goals and Policies of the General Plan, and demonstrated that the project met the overall intent of the General Plan. As demonstrated therein, the land use pattern, both in the immediate neighborhood of the subject property and in the larger Arts District, has already evolved from its historic industrial and manufacturing uses to light industrial and manufacturing uses and new technologies along with compatible and complementary non-industrial uses including residential, creative office, and related retail/cultural/entertainment uses, reflecting larger employment and economic trends. The Project Site is approximately 1.78 acres and the nearby area contains a mix of industrial, residential, and commercial uses, including former industrial sites that have been redeveloped or replaced with arts-focused live-work projects within 0.5 mile, as noted in the related projects listed in Section III, Environmental Setting, Table III-2, of the Draft EIR and shown in Figure III-2 of the Draft EIR. In addition, the ILUP Map for Analysis Area 5 shows that the Project Site survey of land use is "Commercial / Service / Office", and the ILUP forms a planning study itself. Thus, the surrounding area reflects a Project Site that had already converted from industrial uses.

Consistent with the evolution of the light industrial activity and new technologies, the Arts District neighborhood has been identified as the center of cleantech ecosystem for the City and the region. In 2011, the City of Los Angeles and the Los Angeles Department of Water and Power established the Los Angeles Cleantech Incubator (LACI) on 5th and Hewitt St. in the Arts District. The City and DWP partnered with the Economic Development Administration, California Energy Commission, US Department of Energy, and the State of California.

While the Project does not preserve the industrial land use, it does expand employment opportunities and housing through a cluster of uses and is being implemented in an area where comparable uses currently exist, and which satisfies the need for new housing, office and commercial uses, and updated/renovated industrial uses that will support the growth of the Arts District. Finally, the ILUP stated that if unique circumstances existed to approve a change of use or zone in an 'Employment Protection District' the findings for such determination must be clearly articulated and the project should be required to incorporate community benefits. These findings and benefits are delineated herein.

DTLA 2040

DTLA 2040 is the update of the Central City Community Plan and the Central City North Community Plan, which comprise Downtown Los Angeles. The City has hosted a public scoping meeting for the Community Plan Update, published preliminary land use documents, and is currently in process of preparing an Environmental Impact Report for the Plan. The following core principles represent the long-term priorities for downtown:

- Accommodate anticipated growth through 2040
- Support and sustain downtown's ongoing revitalization
- Reinforce downtown's jobs orientation
- Grow and support the residential base
- Promote a transit, bicycle, and pedestrian friendly environment
- Strengthen neighborhood character
- Create linkages between districts
- Create world-class streets and public realm

The Department has also released a Plan Concept Map for public review, which identifies the project site within the Hybrid Industrial plan designation. The maximum FAR in the Hybrid Industrial designation is 8.5:1. Hybrid Industrial areas are considered to have a distinct urban form characterized by medium and low scale development with an industrial legacy. The Community Plan Update establishes that these places preserve productive activity and prioritize space for employment, including light industrial, new industry, commercial, and vertically integrated businesses, with careful introduction of live-work uses. The DTLA 2040 draft states that "Hybrid Industrial places have a distinct urban form characterized by medium and low scale development with an industrial legacy. High-quality new construction and repurposed structures collectively promote a resourceful approach to urban development that can evolve over time. These areas preserve productive activity and prioritize space for employment, including light industrial, new industry, commercial, and vertically-integrated businesses, with careful introduction of live-work uses. The industrial legacy is reflected with a network of irregular streets, punctuated by occasional passageways. The street, block and building pattern has evolved into an inviting environment for pedestrians and cyclists."

The Project is consistent with the permitted uses, FAR ranges, and applicable policies in the Community Plan Update that apply to the project site and other properties within the boundary of the proposed Hybrid Industrial land use designation. The project has been designed to reflect the industrial character of the area and will provide new green space and public gathering space via the pedestrian paseos. In addition, the project will provide over 100,000 square feet of office uses which will help to meet the goal of expanding employment. Given the proximity to numerous transit options, the project is in line with the City's efforts of providing an engaging mix of residential and commercial uses adjacent to regional tourism and major employment centers.

Walkability

The Citywide Design Guidelines complement and expand upon the Walkability Checklist, (adopted by the City Planning Commission on August 23, 2007), which provides guidance and tools for encouraging pedestrian activity, promoting high quality urban form, and place-making within project sites. The Checklist reinforces many of the same principles identified in the Citywide Design Guidelines, and addresses such topics as building orientation, building frontage, landscaping, off-street parking and driveways, building signage, and lighting within the private realm; and sidewalks, street crossings, on-street parking, and utilities in the public realm.

The proposed project is consistent with the goals and implementation strategies identified in the Walkability Checklist. In general, the site design creates active environments by supporting a variety of pedestrian activities, and buildings are oriented and easily accessible from adjacent public streets and open spaces. Driveways are minimized within the project site, while providing essential vehicle ingress and egress to internal parking areas. Improvements to the public right-of-ways include updated sidewalks, street trees, and street lighting. These on- and off-site project features and improvements will lend themselves to create a safe and engaging

pedestrian environment, and will enrich the quality of the public realm, consistent with the objectives of the Walkability Checklist.

On-Site Related Cases

VTT-74564: Tentative Tract application for the project located at 2110 and 2130 East Bay Street, 2141 East Sacramento Street, 2110 and 2130 East Bay Street, 2141 East Sacramento Street to create one master ground lot comprising the entire site, and pursuant to LAMC Section 17.03 A an adjustment in density of less than 20% in the CM Zone lot area requirements (one unit per 800 square feet of lot area) to permit a density equal to one unit per 712 square feet of lot area (11%) for a project to include a maximum of 110 Live/Work Units.

VTT-74564-1A: Appeals of Tentative Tract 74564 on May 6, 2019 which will be considered at the November 14, 2019 CPC.

ENV-2016-3480-EIR: Environmental Impact Report (EIR) for the proposed 2110 Bay Street Project. On April 26, 2019, the Deputy Advisory Agency and Hearing Officer, on behalf of the City Planning Commission, considered, pursuant to Section 21082.1(c) of the California Public Resources Code, the adequacy of ENV-2016-3480-EIR (SCH No. 2017031007), findings, Statement of Overriding Considerations and accompanying mitigation measures, Mitigation Monitoring Program as the environmental clearance for the project. The Notice of Availability of the Final Environmental Impact Report was issued on April 2, 2019. On May 5, 2019, VTT-74564 was appealed, thereby decertifying the EIR.

Ordinance No. 183,144: Effective August 20, 2014, the Los Angeles City Council adopted this ordinance amending Section 12.04 of the LAMC to establish the Los Angeles River Improvement Overlay (RIO) District and amend the zoning map accordingly.

Ordinance No. 183,145: Effective August 20, 2014, the Los Angeles City Council adopted this ordinance to authorize the establishment of the River Improvement Overlay (RIO) Districts and River Design Guidelines for designated areas adjacent to the City's waterways.

Case No. CPC-2007-3036-RIO: On February 14, 2012, the Los Angeles City Planning Commission approved the implementation of Los Angeles River Improvement Overlay (RIO) District resulting in Ordinance No. 183,144.

Case No. CPC-2008-3125-CA: On February 14, 2012, the Los Angeles City Planning Commission approved the addition of a River Improvement Overlay (RIO) District as part of Los Angeles River Revitalization Master Plan (LARRMP) resulting in Ordinance No. 183,145.

Case No. CPC-2006-48-ICO: On June 8, 2006, the Los Angeles City Planning Commission disapproved a proposed Interim Control Ordinance for the approval of entitlement and issuance of buildings permits for projects adjoining the Los Angeles River.

Off-Site Related Cases within 500 feet:

CPC-2017-624-GPA-VZC-HD-SPR: Project proposed at 2136-2148, 2159 East Bay Street and 2145-2161 Sacramento Street, for the development of a commercial project consisting of 222,189 square feet of office and creative office uses with accessory retail and restaurant uses. The requested entitlements filed include1) Vesting Zone and Height District Change; 2) Master Conditional Use Permit (Alcohol Sales); 3) Zoning Administrator's Adjustment; 3) Site Plan Review; and, other discretionary and ministerial permits and approvals that may be deemed necessary.

CPC-2017-437-GPAJ-VZCJ-HD-VCU-CU-MCUP-SPR: Project proposed at 2117-2147 E. Violet

Street and 2118-2142 E. 7th Place, for the development of a new mixed-use project consisting of up to 509 dwelling units, up to 288,230 square feet of commercial space, and the retention of 55,625 square feet if existing commercial uses. The requested entitlements filed include 1) General Plan Amendment; 2) Vesting Zone and Height District Change; 3) A Conditional Use Permit to permit a 34 unit density bonus; 4) Conditional Use to permit a 10% floor area increase to permit 625,301 square feet and for a zero-foot side yard in lieu of 16 feet; 5) Conditional use for a unified development to permit floor area averaging and residential transfer across separate parcels on project site; 6) Master Conditions Use (Alcohol Sales); 7) Site Plan Review, and other discretionary and ministerial permits and approvals that may be deemed necessary.

CPC-2016-1706-VZC-HD-SPR: On December 14, 2016, the City Planning Commission approved the construction of a nine-story, 108 foot in height building with 90,773 square feet of office space and 6,163 square feet of ground floor commercial space with 96,936 square feet of total floor area. The entitlements included a vesting zone and height district change from M3-1-RIO TO M3-2D-RIO.

DIR-2014-3936-SPR: On June 6, 2015, the Director of Planning approved a Site Plan Review for the demolition of an existing 29,318 square-foot building and a 29,318 square-foot addition to, and rehabilitation and adaptive reuse of, an existing five-story, 254,265 square-foot building (for a total of 283,583 square feet) and the construction, use and maintenance of a five-level parking structure in the M3-1-RIO Zone.

ZA-2004-2132-ZAD: On August 31st, 2004, the Zoning Administrator approved a Zoning Administrator's Determination to permit the conversion, use and maintenance of the second story of an existing manufacturing building into a four unit joint living and work quarters (artist in residence).

ZA-2003-6843-ZAD: On January 15, 2004, the Zoning Administrator approved the conversion, use and maintenance of an existing light manufacturing use building into one artist in residence unit (joint living and work quarters) at 2149 E. Bay Street.

ZA-2002-6833-ZAD: On March 14, 2003, the Zoning Administrator approved a Zoning Administrator's Determination to permit a Joint Living and Work Quarter for an artist or artisan, located at 1327 E. Willows Street.

ZA-2000-1712-CUZ-SUB-ZV-SPR-ZAI: On July 17, 2001, the Zoning Administrator approved a Zoning Administrator's Determination to allow 408 Joint Living and Work Quarters, located at 970 E. 3rd Street.

VTT-74928: A Vesting Tentative Tract Map with one ground lot and four commercial condominiums.

VTT-74890: a Vesting Tentative Tract Map for the merger and resudbivision of the project site (2117-2147 E. Violet Street) into three lots.

Access and Circulation

Parking would be provided on-site on multiple subterranean floors, with ingress/egress via a driveway intersecting the north side of Sacramento Street, and egress only via a driveway intersecting the south side of Bay Street, east of Santa Fe Avenue. A loading driveway and trash/utility access would be provided adjacent to the egress-only driveway on Bay Street. Another loading driveway would be located on Sacramento Street, just east of Santa Fe Avenue.

The project will facilitate efficient pedestrian circulation. The buildings are located at or near the property lines and creates a strong, articulated street wall with active ground floor uses including pedestrian paseos. Parking is located in three levels of subterranean space, allowing pedestrians exposure only to active uses. The project will also improve the adjacent streetscape by providing public improvements in the form of publicly accessible paseos stretching from Bay Street to Sacramento Street. The project proposes additional pedestrian amenities including seating, communal tables, planters, artwork, planters, an amphitheater and bike racks.

Long-term bicycle parking would be provided in secure, convenient and well-maintained parking facilities located on the ground level. Short-term bicycling would be provided at locations near the entrances on Bay and Sacramento Streets and adjacent to the alley.

Urban Design

The Citywide Design Guidelines, adopted by the City Planning Commission on June 9, 2011, establish a baseline for urban design expectations and present overarching design themes and best practices for residential, commercial, and industrial projects. Commission policy states that approved projects should either substantially comply with the Guidelines or through alternative methods to achieve the same objectives, and that the Guidelines may be used as a basis to condition an approved project. These design guidelines focus on several areas of opportunity for attaining high quality design in mixed-use projects, including: enhancing the quality of the pedestrian experience along commercial corridors; nurturing an overall active street presence; establishing appropriate height and massing within the context of the neighborhood; maintaining visual and spatial relationships with adjacent buildings; and optimizing high quality infill development that strengthens the visual and functional quality of the commercial environment.

The 2110 Bay Street project achieves these goals through several features. The site design of the mixed-use development creates an active pedestrian experience along all street frontages to create a strong functional pedestrian linkage between Sacramento Street and Bay Street through the use of ground floor commercial lining pedestrian paseos and a central courtyard complementing the development along this budding commercial corridor, particularly Bay Street, home to the neighboring five-story SoHo House, an adaptive reuse project of an industrial loft to a club, hotel and performance venue, and the also neighboring Hyperloop Site, a creative office development and site of a current proposal for a commercial project consisting of 222,189 square feet of office and creative office with accessory restaurant and retail uses along both Sacramento and Bay Streets. To engage the public sidewalk areas, the buildings contain active uses and appropriate code-compliant signage along the ground-floor levels. These ground-floor elevations incorporate pedestrian-scaled entrances and entry plazas, as well as articulated and transparent storefronts and an office and residential lobby entrances with high ceiling heights. The parking is subterranean and therefore optimal for pedestrians. Additional pedestrian amenities include wide sidewalks (13 feet along both Sacramento and Bay Streets), new street trees and street lighting. Overall, the building elevations utilize a variety of architectural features, building materials, and changes in building depth and color in order to create a consistent rhythm and cohesive theme for the development. The scale, massing, and style of the buildings is also appropriate in the larger context of the neighborhood, which is developed with other large-scale developments.

Entitlements:

In order to develop the project, the project requires the following land use entitlements:

- Consideration of the **Environmental Impact Report** document (which consists of the Draft EIR, Final EIR and Errata); adoption of the Statement of Overriding Considerations for unmitigatable impacts with regards to operational traffic impacts at one intersection (Soto

Street & Whittier Boulevard); adoption of Environmental Findings and adoption of a Mitigation Monitoring Program to off-set any potential environmental impacts the project may have on the environment.

- A **General Plan Amendment** from Heavy Industrial to Commercial Industrial over the entire site; and the deletion of Community Plan Footnotes 1 (Height District No. 1) and 6 (for properties designated on zoning maps as Height District Nos. 1, 1L, 1VL, or 1XL (or their equivalent), development exceeding a floor area ratio of 1:5:1 up to 3:1 may be permitted through a zone change height district change procedure, including an environmental clearance) from the Industrial land use category to accommodate a "2" Height District in the CM zone.

- A **Vesting Zone Change** and **Height District Change** from M3-1-RIO to [T][Q]CM-2-RIO over the entire site, to allow an FAR of 3.9:1 in lieu of the current 1.5:1 FAR limitation.

- A **Site Plan Review** to review the site design for orderly development, compatibility with adjacent uses and infrastructure, and potential impacts to public safety and the environment.

In addition, approval of a **Vesting Tentative Tract Map** (VTT-74564) for Tentative Tract application to create one master ground lot comprising the entire site, and pursuant to LAMC Section 17.03 A an adjustment in density of less than 20% in the CM Zone lot area requirements (one unit per 800 square feet of lot area) to permit a density equal to one unit per 712 square feet of lot area (11%) for a project to include a maximum of 110 Live-Work Units. The approval was appealed on May 6, 2019, and is under consideration as a concurrent request under Case No. VTT-74564-1A.

Issues

Live-Work Use and Neighborhood Compatibility

Department of City Planning staff worked with the applicant at various stages of the planning process to ensure that the project would be compatible with the surrounding built and future environment, both in terms of the proposed development program and the physical design of the project.

Historically, the area surrounding the site has been industrial in nature with large warehouses, loading docks, and light manufacturing uses. Over time, new uses have been introduced to the area in response to market trends and the granting of Zoning Administrator actions allowing for the conversion of industrial buildings into live-work uses. The Toy Factory Lofts, Barker Block development, and Biscuit Company Lofts, located approximately 0.5 miles north of the project site, were part of those conversions from industrial to live-work uses. In addition, the area has transitioned to include creative office, retail, new construction live-work units, artisanal breweries, restaurants, and art galleries. More recently, media and technology firms from Warner Music to Hyperloop One have begun to establish creative offices in the area, with offices adjacent to the project site. In the immediate vicinity of the project site, the trend continues with projects such as the SoHo House, east of the project site, a club, hotel and performance venue at 1000 Santa Fe, and at 2133 Bay Street, directly across from? the site is a repurposed 12,698 industrial building into creative office and diagonal to the site at 2149 Bay Street, is an Artist-in-Residence in a 9,848 square foot industrial loft. Other nearby adaptive reuse projects along Sacramento Street include an 11,210 square foot art gallery at 2116 Sacramento Street, a 4,960 square foot music studio and art gallery at 1018 Santa Fe. Other projects in the area include 405 Mateo, a repurposed five-story warehouse building (the 1920's Maxwell Coffee Building) into creative office, and finally 500 feet northwest and west of the project site are 1003 E. 4th Place, where an eight-story building featuring 33,000 square feet of

offices is now under construction and the La Kretz Innovation Campus has introduced 60,000-square-feet of creative office targeting clean technology and digital companies. New live-work buildings are also underway, including at 695 S. Santa Fe Avenue (AMP Lofts), located a third of a mile north of the project site, and the Barker Block development consisting of 297 Joint Live-Work condominium units a mile north from the project site. The evolution from traditional industrial uses toward light industrial and manufacturing uses and new technologies, has increased the demand for housing and services to support this growing employment base.

As a condition of initiating the plan amendment, the Department of City Planning established parameters to ensure that the proposed development would be compatible with the character of the Arts District. One objective was to retain or promote jobs-producing uses, which will be realized by the provision of over 163,000 square feet of commercial floor area including 113,500 square feet dedicated to creative office/commercial space and 50,484 square feet of retail and restaurant space. The ground floor of the buildings (Type 1 construction) feature a minimum 16-foot high ceilings and open, configurable floor plates to accommodate a range of productive uses. Furthermore, all proposed residential units have an average size of at least 947 square feet with a minimum workspace area of 150 square feet to allow for the creation of arts and crafts or production. The live-work units each provide a minimum clearance of 10 feet as measured from the top of the flooring to the ceiling. Another Department objective was to provide affordable housing, which the project will realize through the provision of 11% Very Low Income units.

The Department of City Planning also encouraged design that is consistent with the character of the neighborhood. Proposed architectural materials include a window walls façade within a steel grid framework, perforated metal and dark metal panel accent walls, and large industrial-style windows. The buildings exhibit varying changes in facades planes throughout the project, with the ground floors further differentiated with concrete panels and floor-to-ceiling windows. Consistent with good planning practice, the project features a high degree of street façade transparency (floor to ceiling windows on the ground floors), and the three level subterranean parking is not visible to pedestrians. The paseos connecting Sacramento and Bay Streets are also lined with commercial uses and all ground floors of the project include almost entirely of retail uses, including the creative office building. Both frontages along Sacramento and Bay Streets are lined with commercial uses. The project will adaptively reuse an existing approximately 30-foot tall shed structure by creating an approximately 17 foot-tall single-story structure with a roof top open space element under the reconstructed shed. As designed, the proposed project would enhance the subject site and would be compatible with the evolving Arts District, which is transitioning from purely light industrial uses towards accommodating new forms of employment and residential uses.

Architectural Design

The project is designed in a contemporary architectural style that compliments the surrounding industrial buildings by providing metal and concrete paneling, a steel frame and clean, linear lines.

The project was reviewed by the Professional Volunteer Program on May 7, 2019, resulting in the following comments with regard to the architectural design of the project:

PROFESSIONAL VOLUNTEER PROGRAM COMMENTS	APPLICANT'S RESPONSES
The three buildings do not relate from a design perspective. Consider refining them and add some common architectural elements.	The design intent of this project is to create a fine-grained development rather than a monolithic megaproject. This approach is in line with the existing character of the Arts

	District. The Project proposes three different building typologies native to the Arts District: the office building utilizes a sawtooth roof, the live-work building is of an open-floor concrete loft style and the shed building is a repurposed industrial shed. Simple building materials referential to Arts District character are utilized throughout. Also, vibrant at-grade public space and site landscaping will unite the site as one development. Ultimately, the different typologies are brought together by a vibrant network of paseos, landscaping and public space that creates a cohesive development celebrating the diversity and unique character of the Arts District.
Consider creating connections for pedestrians and bikes.	We believe having pedestrian and visual connections with the adjacent buildings is important as our goal is to create a vibrant and engaging community. We are considering a possible pedestrian connection with a small gathering space adjacent to the future Hyperloop site development. This modification allows for the potential of a through connection to the river by others. Note that the open corridor through the creative office building will be secured off of Sacramento Street and the Central Plaza area. Some of the existing concrete façade will be broken with transparent guardrails, recessed openings, glazing at feature elements, artwork and landscaping. Refer to revised floor plans and building elevations for additional information.
Consider defining the center space and consider redesigning it, open it up add interesting elements and consider the solar orientation.	The central space is located in the heart of the project with visibility and access from both Bay and Sacramento Streets. Building forms around the center space have been strategically articulated and notched to create this unique urban plaza. Performance stage, auditorium seating and outdoor dining experiences will provide for site all-hours site activation. The central plaza is shaded by taller buildings around with shade trees located to provide sun shading.
Consider redesigning the commercial lobby to be bigger and more open to the middle open space.	Our office building is designed to be truly “creative” which will fall outside of a traditional office layout. Our focus is to promote flexible layout and employee wellness. Outdoor corridors create a “front door” for each tenant

	space and lobby functions will be provided for at each tenant space. Nonetheless, the lobby size has been increased and includes space for centralized mail and package pickup. Additional bike parking will be moved to Level P1.
Consider removing Loading at the south, creates a back-of-the-house feeling to Sacramento Street.	Loading is required by code. Current location is the best location because it is the only side that directly fronts the street. Alley is not wide enough for efficient loading. In an effort to avoid a back of house feeling to Sacramento Street, the loading entrance has been minimized and the architecture of the opening and door will be integrated into the overall building to minimize impact.
Consider a Stormwater Strategy - connection with the River experience. Work with DOT/Sanitation in regards to stormwater opportunities.	Noted
Consider a Living Street - discussion with Urban Design Studio and BOE in regards to expanding Bay Street with green strategies and curb issues for local streets/improvements.	Our design incorporates various strategies to promote Living Street. A new public sidewalk totaling 13' (10' in ROW + 3' dedication from our property) will be provided along Bay and Sacramento. New street trees and pedestrian lighting will be incorporated into the new Public Right of Way improvements. Improved paving at Bay Street corner will provide easy pedestrian access from valet drop-off and from public right of way to the internal public areas. Well-lit and landscaped internal paseos will provide porous pedestrian connections through the site.
Consider Net Zero. What is the building's strategy?	Currently, the project is not pursuing ZNE which is not specifically required by the upcoming 2020 code changes. We are seeking a targeted EUI of 30 for the residential component (compared to 59.6 as the national average) and 25 for the office (compared to 52.9). These represent roughly 50% target reductions in energy consumption, with the potential of even lower carbon impact with onsite renewables. The office and residential components may leverage passive strategies and radiant flooring to reduce HVAC load. Additional strategies that may be explored for the project include an intuitive BAS system (largely for the residential and office), increased thermal envelopes, potentially automated/programmable controls (with respect to interior shading – see Lutron's systems), and improved systems, such as

	VRF. These decisions will be made by the design team with a LCCA (Life Cycle Cost Analysis) through Savings By Design. This process, during schematic design will help determine the most appropriate mechanical systems for the project as well as other EEMs (Energy Efficiency Measures) relating to lighting loads and appliance loads. The Project will also provide 2000 SF of roof space for solar panels.
Consider a Tree strategy - soil depth	The project will provide a 4-foot minimum soil depth for feature trees on site.
What is the strategy for cooling the semi-open spaces at the middle of the project?	We are providing shade trees for site cooling and buildings will also create enough shade during different times of the day.
Be familiar with context-towards the river, pedestrian connections with the proposed project to the east	Connection opportunities are provided on project site to adjacent properties. Additional connections to river would be provided by others.
Make sure the paseos are not gated and there is access to the public.	Internal paseos will be publicly accessible without gates from sunrise to sunset.

Applicability of Measure JJJ

On November 8, 2016, voters in the City of Los Angeles approved and passed Measure JJJ, the Build Better LA Initiative, which imposed minimum affordable housing requirements and labor regulations on certain development projects requiring General Plan Amendments, Zone Changes and Height District Changes, and became effective on December 13, 2016, following the Council's action to certify the election results.

It should be noted that while the proposed Project includes a General Plan Amendment, Vesting Zone Change and Height District Change, the Vesting Zone Change and related Vesting Tentative Map applications were both deemed complete by the Department of City Planning on December 5, 2016, prior to the effective date of Measure JJJ regulations. Therefore, Measure JJJ is not applicable to this Project.

Pursuant to LAMC Section 11.5.11, any development project that allows a residential use where previously not allowed shall provide no less than 5 percent of the total units at rents affordable to Extremely Low Income households, or 6 units, and either 11 percent of the total units at rents affordable to Very Low Income households, or 12 units, or 20 percent of the total units at rents affordable to Lower Income households, or 22 units. While not required, the Project voluntarily proposes to set aside approximately 11 percent of the total units for Very Low Income households.

Environmental Analysis

The following is a summary of the environmental review process and final impacts resulting from the proposed project. In compliance with CEQA Guidelines Section 15375 and Section 15082, the City published the Notice of Preparation (the "NOP"), which was sent to responsible agencies and members of the public for a 30-day review period commencing March 6, 2017 and ending April 5, 2017, identifying the scope of the environmental issues. The purpose of the NOP

was to formally convey that the City was preparing a Draft EIR for the proposed Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. The Initial Study and NOP are provided in Appendices A-1 and A-2 to the Draft EIR. A Public Scoping Meeting was held on March 16, 2017 at 634 Mateo Street, from 5:00 PM to 7:00 PM. The meeting was held in an open house or workshop format and provided interested individuals, groups, and public agencies the opportunity to view materials, ask questions, and provide oral and written comments to the City regarding the scope and focus of the Draft EIR. During the NOP comment period or at the scoping meeting, the City received comments from five agencies (Los Angeles Department of Sanitation, California Department of Transportation, California Native American Heritage Commission, Los Angeles Fire Department, and South Coast Air Quality Management District), and no individuals. The letters and comments received during the NOP comment period are included in Appendix A-3 of the Draft EIR. The Draft EIR for the Project, which is incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and City of Los Angeles (City) CEQA Guidelines (Public Resources Code Section 21000, et seq., 14 California Code of Regulations Section 15000, et seq., City of Los Angeles Environmental Quality Act Guidelines). The Draft EIR evaluated in detail the potential environmental effects of the Project. The Draft EIR also analyzed in detail the effects of four alternatives to the Project. These included: 1) No Project; 2) All Office/Commercial; 3) Reduced Intensity; and 4) Zoning Compliant. In accordance with the provision of Sections 15085(a) and 15087(a)(1) of the State CEQA Guidelines, the Draft EIR was distributed for public review (including the State Clearinghouse) for a 45-day review period (plus holidays), starting on November 8, 2018 and ending on December 26, 2018. A Notice of Completion and Availability was distributed to those public agencies that have jurisdiction by law with respect to the Project, or which exercise authority over resources that may be affected by the Project, and to other interested parties and agencies as required by law, which informed them of where they could view the document and how to comment. The Draft EIR was available to the public at the Department of City Planning, and the following local libraries: Los Angeles Central Library, Franklin Branch Library, Chinatown Branch Library, and Little Tokyo Branch Library, A copy of the document was also posted online at https://planning.lacity.org/. A total of six comment letters were received by the close of the public comment period. The specific and general responses to comments are in Section II (Responses to Comments) of the Final EIR. The Final EIR and responses to public agency comments were distributed on April 2, 2019.

On April 17, 2019 a subdivision hearing was held by the Deputy Advisory Agency. The Deputy Advisory Agency certified the EIR on April 26, 2019 in connection with its approval of the vesting tentative tract map VTT-74564 for the project. The approval was appealed on May 6, 2019 and is under consideration under concurrent Case No. VTT-74564-1A. The Environmental Impact Report identified impacts that would have 1) no impacts or less than significant impacts, 2) potential significant impacts that could be mitigated to less than significant, and 3) significant and unavoidable impacts. The impacts are summarized below:

Impacts found to have No Impact or Less Than Significant include the following:
Aesthetics Air Quality
Biological Resources
Agricultural and Forestry Resources
Cultural Resources (Historical Resources) Geology and Soils
Greenhouse Gas Emissions Hazards and Hazardous Materials Hydrology and Water Quality Land Use and
Planning
Mineral Resources
Noise (Construction/Operational Noise, Operational Vibration) Population and Housing Public Services
Transportation (Construction Traffic, Site Access, Regional Transportation System) Tribal Cultural

Resources
Utilities and Energy
Energy Conservation and Infrastructure

Impacts found to have Less Than Significant Impacts with Mitigation include: Cultural Resources
(Archaeological Resources, Paleontological Resources) Noise (Construction Vibration)

Impacts Found to Be Significant
Traffic (Intersection LOS)

In order to address specific land use policies relating to the project, an Errata, dated October 2019, to the EIR was released and posted on the city's website.

Agency Reports Received:

Letters were received from the Department of Public Works (Bureau of Engineering and Bureau of Street Lighting), Fire Department, Department of Building and Safety (Zoning Division and Grading Division prior to the completion of the Hearing Officer's report. These recommendations were included in the conditions for the Vesting Tentative Tract Map VTT-74564. Conditions applicable to the zone change have been incorporated as [Q] or [T] conditions of approval.

Conclusion

The project is a mixed-use development that provides 110 live-work units, of which 11 percent will be reserved for Very Low Income Households, active ground-floor commercial uses, including 50,848 square feet of new commercial space (retail or restaurant), 113,350 square feet of creative office, rooftop amenity spaces, publicly accessible paseos, and various streetscape and transit-oriented improvements to the immediate area. The project enhances the built environment through the unified development of the site, and would include essential and beneficial uses by including commercial, office, and live-work components near Downtown's transit-rich regional center of commerce, tourism, and entertainment. The project's replacement of a 4,000 square-foot manufacturing building, vacant open air warehouse and surface parking lot with 113,350 square feet of office and 50,858 square feet of restaurant and retail uses supports the Arts District's identity as an employment area and support's the city's desire to preserve employment as a primary focus of the Arts District.

The proposed development would be compatible with the site's proposed Commercial Industrial designation and the policies of the General Plan. The requested CM Zone, Height District 2, and D limitations are in conformance with the public necessity, convenience, general welfare, and good zoning practice. Staff recommends approval of the Commercial Industrial designation and (T)(Q)CM-2D-RIO Zone with the attached (Q) Qualified conditions, (T) Tentative conditions, and D limitations, which support the policies of the Land Use Element of the General Plan.

The project results in a development that includes a beneficial mix of uses that allow for a cohesive site design, creating active and safe pedestrian environments, and offering a variety of amenities and open space features. The project's location, uses, height, and other features would be compatible with the surrounding neighborhood, and would not adversely affect public health, welfare, and safety. Furthermore, overriding considerations of economic, social, aesthetic, and environmental benefits for the Project justify adoption of the Project and utilization of the previously certified EIR. Therefore, Department of City Planning staff recommends that the City Planning Commission approve the proposed project and corresponding entitlement requests.

CONDITIONS FOR EFFECTUATING [T] TENTATIVE CLASSIFICATION REMOVAL

Pursuant to Section 12.32-G of the Municipal Code, the (T) Tentative Classification shall be removed by the recordation of a final parcel or tract map or by posting of guarantees through the B-permit process of the City Engineer to secure the following without expense to the City of Los Angeles, with copies of any approval or guarantees provided to the Department of City Planning for attachment to the subject planning case file.

Dedication(s) and Improvement(s). Prior to the issuance of any building permits, the following public improvements and dedications for streets and other rights of way adjoining the subject property shall be guaranteed to the satisfaction of the Bureau of Engineering, Department of Transportation, Fire Department (and other responsible City, regional and federal government agencies, as may be necessary). Dedications and improvements herein contained in these conditions which are in excess of street improvements contained in either the Mobility Element 2035 or any future Community Plan amendment or revision may be reduced to meet those plans with the concurrence of the Department of Transportation and the Bureau of Engineering:

Responsibilities/Guarantees.

1. As part of early consultation, plan review, and/or project permit review, the applicant/developer shall contact the responsible agencies to ensure that any necessary dedications and improvements are specifically acknowledged by the applicant/developer.

2. **Bureau of Engineering**. Street Dedications and Improvements shall be provided to the satisfaction of the City Engineer.

3. **Sewer.** Construction of necessary sewer facilities, or payment of sewer fees, shall be to the satisfaction of the City Engineer.

4. **Drainage.** Construction of necessary drainage and storm water runoff drainage facilities to the satisfaction of the City Engineer.

5. **Driveway/Parkway Area Plan.** Preparation of a parking plan and driveway plan to the satisfaction of the appropriate District Offices of the Bureau of Engineering and the Department of Transportation.

6. **Fire.** Incorporate into the building plans the recommendations of the Fire Department relative to fire safety, 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.

7. **Cable.** Make any necessary arrangements with the appropriate cable television franchise holder to assure that cable television facilities will be installed in City rights-of-way in the same manner as is required of other facilities, pursuant to Municipal Code Section 17.05.N to the satisfaction of the Department of Telecommunications.

8. **Recreation and Park Fees.** Payment of the Quimby fee shall be based on the CM Zone and be paid prior to the recordation of Final Tract map.

9. **Lighting.** Street lighting facilities shall be provided to the satisfaction of the Bureau of Street Lighting.

10. **Street Trees.** All trees in the public right-of-way shall be provided per the current Urban Forestry Division Standards.

Notice: Certificates of Occupancy for the subject property will not be issued by the City until the construction of all the public improvements (streets, sewers, storm drains, etc.), as required herein, are completed to the satisfaction of the City Engineer.

[Q] QUALIFIED CONDITIONS OF APPROVAL

Pursuant to Section 12.32-G of the Municipal Code, the following limitations are hereby imposed upon the use of the subject property, subject to the "Q" Qualified classification.

A. Development Conditions:

1. **Site Development.** The use and development of the property shall be in substantial conformance with the Site Plans, Floor Plans, Building Elevations, Landscape Plan (Exhibit A, dated July 31, 2019) of the subject case file. No change to the plans will be made without prior review by the Department of City Planning, and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Municipal Code or the project conditions.

2. **Development Services Center.** Prior to sign-off on building permits by the Department of City Planning's Development Services Center for the project, the Department of City Planning's Major Projects Section shall confirm, via signature, that the project's building plans substantially conform to the conceptual plans stamped as Exhibit "A", as approved by the City Planning Commission.

   Note to Development Services Center: The plans presented to, and approved by, the City Planning Commission (CPC) included specific architectural details that were significant to the approval of the project. Plans submitted at plan check for condition clearance shall include a signature and date from Major Projects Section planning staff to ensure plans are consistent with those presented at CPC.

3. **Affordable Housing.** A minimum of 11 percent of the total dwelling units, shall be reserved for households earning no more than 50 percent of the Area Median Income for Very Low Income Restricted Affordable Units, as defined by Section 50079.5 of the California Health and Safety Code, and as determined by the Los Angeles Housing and Community Investment Department (HCIDLA).

   Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing and Community Investment Department (HCIDLA) to make 11% of total units built available as Very Low Income Units, for sale or rental as determined to be affordable to such households by HCIDLA for a period of 55 years. Enforcement of the terms of said covenant shall be the responsibility of HCIDLA. The applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with the Guidelines for the Affordable Housing Incentives Program adopted by the City Planning Commission and with any monitoring requirements established by the HCIDLA.

D LIMITATIONS

Pursuant to Section 12.32-G of the Municipal Code, the following limitations are hereby imposed upon the use of the subject property, subject to the D limitation.

A. Development Limitations:

1. **Floor Area Ratio.** Floor area over the entire site, as identified in the Ordinance Map, shall not exceed 3.9, not to exceed a total of 287,137 square-feet of floor area.

2. **Building Height.** Building height shall be limited to a maximum height of 149 feet for the live-work tower and 100.5 feet for the office tower consistent with Exhibit A.

CONDITIONS OF APPROVAL

Pursuant to Sections 16.05 of the Los Angeles Municipal Code, the following conditions are hereby imposed upon the use of the subject property:

Site Plan Review Conditions

1. **Development Services Center.** Prior to sign-off on building permits by the Department of City Planning's Development Services Center for the project, the Department of City Planning's Major Projects Section shall confirm, via signature on the plans, that the project's building plans substantially conform to the conceptual plans stamped as Exhibit "A", as approved by the City Planning Commission.

   Note to Development Services Center: The plans presented to, and approved by, the City Planning Commission (CPC) included specific architectural details that were significant to the approval of the project. Plans submitted at plan check for condition clearance shall include a signature and date from Major Projects Section planning staff to ensure plans are consistent with those presented at CPC.

2. **Vehicle Parking.**

   a. Residential and Commercial automobile parking spaces shall be provided as required by LAMC Section 12.21 A.4(a), and (c).

   b. **Unbundled Parking.** Residential parking shall be unbundled from the cost of the rental units, with the exception of parking for Restricted Affordable Units.

3. **Electric Vehicle Parking.** The project shall include at least 20 percent of the total code-required parking spaces capable of supporting future electric vehicle supply (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating ampacity. In addition, five percent of the total code required parking spaces shall be further provided with EV chargers to immediately accommodate electric vehicles within the parking areas. When the application of either the required 20 percent or five percent results in a fractional space, round up to the next whole number. A label stating "EVCAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

4. Bicycle Parking. Bicycle parking shall be provided consistent with Ordinance No. 182,386, effective at the time the application was deemed complete.

5. Prior to the issuance of a building permit, the driveway and parking plan shall be submitted for review and approval to the Department of Transportation.

6. **Public Paseos.** The Paseos shall not be gated.
   a. The paseos shall remain open and accessible to the public from sunrise to sunset, seven (7) days a week. No motorized vehicles shall be permitted, except for emergency vehicles used during an emergency.
   b. The paseo area will be maintained in good condition for the life of the Project.
   c. Any special events within the paseo shall obtain a Temporary Special Event (TSE) Permit from the Los Angeles Department of Building and Safety (LADBS).

7. **Landscaping**. Prior to the issuance of a building permit, a landscape and irrigation plan shall be submitted to the Department of City Planning for approval. The landscape plan shall be in substantial conformance with the landscape plan stamped Exhibit A. Minor deviations from the requirements provided below may be permitted by the Department of City Planning to permit the existing landscaping conditions provided that the plantings are well established and in good condition.

8. **Trees**. The Applicant shall provide a minimum of 81 trees on-site and/or in the parkway, to the satisfaction of Urban Forestry.

   a. **Tree Wells.**

      i. The minimum depth of tree wells shall be as follows:
         1. Minimum depth for trees shall be 42 inches.
         2. Minimum depth for shrubs shall be 30 inches.
         3. Minimum depth for herbaceous plantings and ground cover shall be 18 inches.
         4. Minimum depth for an extensive green roof shall be three inches.

      ii. The minimum amount of soil volume for tree wells shall be based on the size of the tree at maturity as follows:
         1. 600 cubic feet for a small tree (less than 25 feet tall at maturity).
         2. 900 cubic feet for a medium tree (25-40 feet tall at maturity).
         3. 1,200 cubic feet for a large tree (more than 40 feet tall at maturity).

   b. Any trees that are required pursuant to LAMC Section 12.21 G and are planted on any podium or deck shall be planted in a minimum three-foot planter.

   c. New trees planted within the public right-of-way shall be spaced not more than an average of 30 feet on center, unless otherwise permitted by the Urban Forestry Division, Bureau of Public Works.

9. **Stormwater/Irrigation.** The project shall implement on-site stormwater infiltration as feasible based on the site soils conditions, the geotechnical recommendations, and the City of Los Angeles Department of Building and Safety Guidelines for Storm Water Infiltration. If on-site infiltration is deemed infeasible, the project shall analyze the potential for stormwater capture and reuse for irrigation purposes based on the City Low Impact Development (LID) guidelines.

10. **Trash and Recycling.**

   a. All trash collection and storage areas shall be located on-site and shall not visible from the public right-of-way.

   b. Trash receptacles shall be stored in a fully enclosed building or structure.

   c. Trash/recycling containers shall be locked when not in use.

11. **Lighting**.

   a. Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above.

b. Areas where nighttime uses are located shall be maintained to provide sufficient illumination of the immediate environment so as to render objects or persons clearly visible for the safety of the public and emergency response personnel.

c. All pedestrian walkways, storefront entrances, and vehicular access ways shall be illuminated with lighting fixtures.

d. Lighting fixtures shall be harmonious with the building design. Wall mounted lighting fixtures to accent and complement architectural details at night shall be installed on the building to provide illumination to pedestrians and motorists.

13. **Glare.** The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

14. **Reflectivity.** Glass used in building façades shall be non-reflective or treated with a non-reflective coating in order to minimize glare from reflected sunlight.

15. **Construction Generators.** The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices. On-site power generators shall either be plug-in electric or solar powered.

16. **Sustainability.**

a. The project shall comply with the Los Angeles Municipal Green Building Code, Section 99.05.211, to the satisfaction of the Department of Building and Safety.

b. **Solar Power.** The project shall provide 2,000 square feet of roof space for solar panels. Solar panels may be installed on all rooftop areas and/or rooftop decks or parking lots with the exception of areas occupied by rooftop mechanical equipment.

17. **Mechanical Equipment.** Any structures on the roof, such as air conditioning units and other equipment, shall be fully screened from view of any abutting properties and the public right-of-way. All screening shall be setback at least five feet from the edge of the building.

18. **Utilities.** All utilities shall be fully screened from view of any abutting properties and the public right-of-way.

19. **Signage.** There shall be no off-site commercial signage on construction fencing during construction.

20. Prior to the issuance of the building permit, a copy of the letter of decision for Case No.VTT-74564 shall be submitted to the satisfaction of the Development Services Center.

21. **Graffiti.** All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.

22. A copy of the first page of this grant and all Conditions and/or any subsequent appeal of this grant and its resultant Conditions and/or letters of clarification shall be printed on the building plans submitted to the Development Services Center and the Department of Building and Safety for purposes of having a building permit issued.

23. **Live/Work Housing**. The live-work units will be designed to comply with Section 419 of the Los Angeles Building Code. The units are designed to be larger than average with taller floor to ceiling heights to accommodate arts and production uses and a minimum 150 square-foot designated work area in each unit. All residential units shall have a minimum clearance of 10 feet from floor to ceiling.

24. Creative Office. The project shall provide a range of creative office spaces, including smaller spaces designed to accommodate small businesses and configurable floor plates to accommodate a range of productive uses.

Environmental Conditions.

25. **Mitigation Monitoring Program**. The project shall be in substantial conformance with the mitigation measures in the attached MMP and stamped "Exhibit B" and attached to the subject case file. The implementing and enforcing agencies may determine substantial conformance with mitigation measures in the MMP. If substantial conformance results in effectively deleting or modifying the mitigation measure, the Director of Planning shall provide a written justification supported by substantial evidence as to why the mitigation measure, in whole or in part, is no longer needed and its effective deletion or modification will not result in a new significant impact or a more severe impact to a previously identified significant impact.

    If the Project is not in substantial conformance to the adopted mitigation measures or MMP, a modification or deletion shall be treated as a new discretionary action under CEQA Guidelines, Section 15162(c) and will require preparation of an addendum or subsequent CEQA clearance. Under this process, the modification or deletion of a mitigation measure shall not require a Tract Map Modification unless the Director of Planning also finds that the change to the mitigation measures results in a substantial change to the Project or the non-environmental conditions of approval.

26. **Mitigation Monitor (Construction).** During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant, the election of which is in the sole discretion of the Applicant), approved by the City of Los Angeles Department of City Planning which approval shall not be reasonably withheld, who shall be responsible for monitoring implementation of project design features and mitigation measures during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

    The Construction Monitor shall also prepare documentation of the Applicant's compliance with the project design features and mitigation measures during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to report to the Enforcement Agency any non-compliance with mitigation measures and project design features within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of written notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

27. **Tribal Cultural Resource Inadvertent Discovery.** In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground

disturbance activities[1], all such activities shall temporarily cease on the Project Site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

- Upon a discovery of a potential tribal cultural resource, the project Permittee shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 473-9723.
- If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Project Permittee and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
- The project Permittee shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the project Permittee, reasonably concludes that the tribe's recommendations are reasonable and feasible.
- The project Permittee shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The project Permittee shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
- If the project Permittee does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the project Permittee may request mediation by a mediator agreed to by the Permittee and the City who has the requisite professional qualifications and experience to mediate such a dispute. The project Permittee shall pay any costs associated with the mediation.
- The project Permittee may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and determined to be reasonable and appropriate.
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.
- Notwithstanding the above, any information determined to be confidential in nature, by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code, and shall comply with the City's AB 52 Confidentiality Protocols.

28. **Archaeological Resources Inadvertent Discovery.** In the event that any subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5. At which time the applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be

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1 Ground disturbance activities shall include the following: excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, pounding posts, augering, backfilling, blasting, stripping topsoil or a similar activity

significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

29. **Paleontological Resources Inadvertent Discovery.** In the event that any prehistoric subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

C. Administrative Conditions:

30. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review or approval, plans, etc., as may be required by the subject conditions, shall be provided to the Planning Department for placement in the subject file.

31. **Code Compliance.** Area, height and use regulations of the zone classification of the subject property shall be complied with, except where herein conditions are more restrictive.

32. **Covenant.** Prior to the issuance of any permits relative to this matter, an agreement concerning all the information contained in these conditions shall be recorded in the County Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assign. The agreement must be submitted to the Planning Department for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Planning Department for attachment to the file.

33. **Definition.** Any agencies, public officials or legislation referenced in these conditions shall mean those agencies, public officials, legislation or their successors, designees or amendment to any legislation.

34. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Planning Department and any designated agency, or the agency's successor and in accordance with any stated laws or regulations, or any amendments thereto.

35. **Building Plans.** Page 1 of the grants and all the conditions of approval shall be printed on the building plans submitted to the City Planning Department and the Department of Building and Safety.

36. **Project Plan Modifications.** Any corrections and/or modifications to the Project plans made subsequent to this grant that are deemed necessary by the Department of Building and Safety, Housing Department, or other Agency for Code compliance, and which involve a change in site plan, floor area, parking, building height, yards or setbacks, building separations, or lot coverage, shall require a referral of the revised plans back to the

Department of City Planning for additional review and final sign-off prior to the issuance of any building permit in connection with said plans. This process may require additional review and/or action by the appropriate decision-making authority including the Director of Planning, City Planning Commission, Area Planning Commission, or Board.

37. **Indemnification and Reimbursement of Litigation Costs.** The 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 $50,000. 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, or 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. Actions 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.

FINDINGS

A. GENERAL PLAN / CHARTER FINDINGS.

The City-initiated General Plan Amendment and requested Zone and Height District Change are in substantial conformance with the purposes, intent, and provisions of the General Plan as explained below:

1. General Plan Land Use Designation.

The subject property is located within the Central City North Community Plan area (effective December 15, 2000), which designates the property as Heavy Industrial with the corresponding zone of M3. The site's current zone is M3-1-RIO. The City-initiated General Plan Amendment will change the land use designation to Commercial Industrial (corresponding zones CM, and P) and will eliminate two footnotes prohibiting "2" Height District designations in this area. The requested CM-2-RIO Zone is therefore consistent with the range of zones under the Commercial Industrial land use designation. The subject property is located within the evolving Arts District neighborhood near Downtown Los Angeles that has been undergoing a transition of land uses. In an area historically characterized by warehouse and industrial uses, the Arts District is now comprised of a diversity of land uses that includes creative office, incubator spaces, artist production spaces, retail and restaurant uses, live-work dwelling units in both new buildings and older adaptive reuse buildings, and new industrial spaces that reflect land uses which have evolved due to technological advances and development of new industry sectors. The proposed project would include uses which are consistent with the existing light industrial and manufacturing uses such as a mix of creative office (which is often paired with media production, research and development, and even light manufacturing activities and is more compatible with the types of legacy industrial structures found in manufacturing areas than traditional office developments), retail and restaurants, and new live-work units that can also accommodate home-based small businesses.

Approval of a General Plan Amendment is necessary to modify the project site's land use designation to Commercial Industrial to accommodate the project while retaining critical job-producing uses in new ways, while also acknowledging the need for housing. The City-initiated General Plan Amendment will support employment where jobs and housing can coexist, while retaining a jobs focus. The project has been designed to continue the production of jobs at this site through 110 new live-work units as well as 113,350 square feet of creative office and 50,848 square feet of new commercial space (that may include retail and/or restaurant floor area). Each unit will meet the standard for live-work units found in Section 419 of the Los Angeles Building Code. The project site is just outside the Artist-In-Residence District identified in the Central City North Community Plan. The Community Plan states that "Artists-In-Residence occupy a large area of Central City North between the Santa Ana Freeway and the Santa Monica Freeway and Between Alameda Street and the Los Angeles River". The project is within these broader boundaries. The Arts District is a more general and non-official term which includes Artist-in-Residence and other related uses that may be outside the official Artist-in-Residence district identified in the Community Plan. The Arts District has evolved over the last few years and there has been a significant amount of live-work and commercial development in an area that was predominately characterized by warehouse and industrial uses. These developments, both conversion and ground up, are consistent with the Central City North Community Plan's description of the Artists-in-Residence Subarea District, whose southern boundary is a half a mile north of the Project Site at Sixth Street, as an area "primarily made up of old warehouses now converted

to artists' lofts and studios." The description of the Artists-in-Residence District also notes that the Community Plan "encourages the continued and expanded development of a thriving artists-in-residence community." Furthermore, the project supports the General Plan by creating jobs and contributing to the housing stock within the City and towards alleviating the city's housing crisis, as well as the Mayor's initiative to build 100,000 homes by 2020. The City-initiated General Plan Amendment will locate live-work housing near the jobs-rich Downtown while also allowing for jobs-producing uses in an area of the City that is becoming a hub for such uses.

Framework Element

The General Plan Framework, adopted in December 1996 and re-adopted in August 2001, establishes the City's long-range comprehensive growth strategy and provides guidance on Citywide land use and planning policies, objectives, and goals. The Framework defines Citywide policies for land use, housing, urban form and urban design, open space and conservation, transportation, infrastructure and public spaces.

The Project's proposed designation is for Commercial Industrial land, which falls under the Industrial land use designation. The General Plan Framework encourages that Industrial land be preserved for the retention and expansion of existing and attraction of new industrial uses that provide job opportunities for the City's residents. As indicated in the Economic Development Chapter of the Framework Element (Chapter 3: Land Use, Industrial definition), some existing industrially zoned lands may be inappropriate for new industries and should be converted for other land uses. The Framework encourages that where such lands are to be converted, their appropriate use shall be the subject of future planning studies. Furthermore, the Framework recognizes that policies provide for the consideration of a broader array of uses within the industrial zones than has traditionally existed to facilitate the clustering of uses, which may include retail, that support the basic industries or the location of industries in the same area where the waste products of one can be recycled as a resource for another ("industrial ecology") or a campus-like cluster of related uses. The project meets the Economic Chapter of the Frameworks Element's criteria for a campus-like cluster, as the project proposes jobs-focused uses in the form of creative office, with the provision of a variety of floor plates to accommodate modern industry, as well as live-work units with work space that can allow for small businesses, as well as commercial retail which supports the residential and office patrons on-site. The project site meets the Economic Chapter of the Framework Element's criteria for such lands to be converted, as it is unlikely that the Project Site could in fact attract any viable industrial use given its size limitation at 1.78 acres, as well as the limited size of the existing vacant manufacturing building that is approximately 4,000 square feet and cannot provide a variety of floor plates to accommodate modern industry. The small manufacturing building fronting Sacramento Street also contains no finished walls or ceiling and roof trusses are visible, thereby unable to accommodate any viable modern industrial use. The project site consists of a large, industrial, shed-like structure that serves as a surface parking lot and contains no electrical wiring, plumbing or finished walls, thereby unable to accommodate any viable industrial uses. Furthermore, as stated in the Central City North Community Plan, the project site is within the Alameda East Study area which as is stated by the community plan, is less than desirable for "modern" industrial activity. These deficiencies include the physical condition of the streets, loading and unloading activities, and parking conditions. Other difficulties include poor design of intersections, the presence of dead end streets, and the lack of continuous north/south corridors. The project supports and will be generally consistent with the General Plan Framework Land Use Chapter as it will allow for the clustering of uses in the community supporting industries in the area and increasing opportunities for employees to live near jobs and residents to live near shopping, entertainment and other amenities in a high quality transit area, as well as providing and increasing employment opportunities in the

area. The Project Site is approximately 1.78 acres and the nearby area contains a mix of industrial, residential, and commercial uses, including former industrial sites that have been redeveloped or replaced with arts-focused live-work projects within 0.5 mile, as noted in the related projects listed in Section III, Environmental Setting, Table III-2, of the Draft EIR and shown in Figure III-2 of the Draft EIR, demonstrating that the land use pattern, both in the immediate neighborhood of the subject property and in the larger Arts District, has evolved from its historic industrial and manufacturing uses to compatible and complimentary residential, creative office, and related retail/cultural/entertainment uses alongside traditional industrial uses, reflecting larger employment and economic trends. These developments, both conversion and ground up, are consistent with the Central City North Community Plan's description of the Artists-in-Residence Subarea District, whose southern boundary is a half a mile north of the Project Site at Sixth Street, as an area "primarily made up of old warehouses now converted to artists' lofts and studios." Furthermore, The ILUP Map for Analysis Area 5 shows that the Project Site survey of land use is "Commercial / Service / Office". Thus, the Site is clearly not an industrial use.

Finally, the entire project approval process, including the CEQA process, the entitlement process, and the various points therein for public comment form a planning study themselves, and further support the consideration of a broader array of uses and the clustering of uses within the industrial zone. The CEQA process included an Environmental Impact Report, which assessed the surrounding land uses, as well as an analysis of the proposed land use in relation to the General Plan and the LA CEQA Guidelines threshold for land use compatibility. The entitlement process further analyzed in detail the Goals and Policies of the General Plan, and demonstrated that the project met the overall intent of the General Plan.

The proposed project is consistent with the goals, objectives and policies of the General Plan Framework as explained below:

Chapter 3: Land Use

Goals 3A of the Land Use Chapter encourages "A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city." The Land Use chapter encourages growth to be located in neighborhood districts, commercial and mixed-use centers, along boulevards, industrial districts, and in proximity to transportation corridors and transit stations. The Land Use Chapter also identifies "Targeted growth areas" which refer to those districts, centers, and boulevards where new development is encouraged and within which incentives are provided by the policies of the Framework Element. These are located in proximity to major rail and bus transit corridors and stations; in centers that serve as identifiable business, service, and social places for the neighborhood, community, and region; as reuse of the City's boulevards; and as reuse of the City's industrial districts to facilitate the development of new jobs-generating uses.

As previously discussed, the project site is located outside the Artists-in-Residence District of the Central City North Community Plan area. However, despite the site being outside the boundaries, the surrounding neighborhood has a significant economic identity from the industrial uses that have historically populated the area. As that economy has evolved, heavy manufacturing uses are transitioning to more digital and creative uses. The project

would be in keeping with this economic identity and evolution as it replaces a surface parking lot and a 4,000 square-foot manufacturing building with a project that will activate the area through the introduction of 110 live-work units, including needed affordable units, on-site production space, approximately 50,848 square feet of new commercial space (that may include retail and/or restaurant floor area) and approximately 113,350 square feet of creative office. The project will facilitate the City's long-term fiscal and economic viability by providing employment opportunities in the form of creative office and live-work units that can accommodate small businesses, which according to the EIR will produce over 600 jobs.

The proposed project also is also a mixed-use project near regional transit in the Los Angeles area which will facilitate the reduction of vehicle miles traveled and improve air quality. The project site is located within an area of Los Angeles which is well-served by local and regional transit lines. The project area is currently served by Metro Rapid Bus No. 760, which runs north-south along Santa Fe with the closest stop at Olympic Boulevard at approximately a 1/3rd of a mile to the southern boundary of the Project at Sacramento Street and three MTA Local Bus Lines, including lines 60 with stops at Santa Fe and 8th Street and at Santa Fe and Violet Street and Metro Lines 18 and 62 stops at Santa Fe and 7th Street, all within a half mile of the project site. 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 a half mile west of the Project Site on 7th Street, which provides inter-city bus service to various locations outside of the Los Angeles area. In addition, Metro is currently considering extending both the Santa Ana Line and Purple Line through the Arts District, and is considering multiple stations in the project vicinity. Development of this mixed-use site would provide potential additional transit riders and will act as a further inducement for Metro to further improved transit in the area. The project is also located within a half mile of Metro's Bike Share system with a "Dock Point" located on Industrial Street at Mateo. Regional access is provided by the I-10 Freeway approximately 650 feet south of the Project Site and the Metro Blue Line Washington Station is 1.1 miles southwest of the Site. The Metro Gold Line Little Tokyo Station is 1.3 miles north of the Site.

The project will also enhance open space opportunities for the area, by including publicly accessible paseos that includes walking paths, green space, gathering areas, an amphitheater and outdoor dining for the public, office and residential users, terraces for residential and office patrons and rooftop open space and amenities for residential patrons. The ground floor open space is accessed by landscaped pedestrian paseos that connect Bay Street and Sacramento Street with two access points along Bay Street and one along Sacramento, thereby providing for the enhancement of recreation and open space opportunities and creating a healthful environment.

Chapter 4: Housing

Goal 4A: An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.

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 to meet the projected housing needs by income level of the future population to the year 2010.

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.

The project will provide housing for a mix of income levels and unit types. Of the proposed 110 live-work units, 11 of the units (or 10%) will be reserved for Very Low Income Households and the remaining units will be market rate. The project is appropriately situated near public transit options with connections and ease of access to jobs, entertainment, and other amenities and is located among other live-work uses within the Central City North Community Plan.

Chapter 5: Urban Form and Neighborhood Design Chapter

Goal 5A: A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.

Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.

Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.

Policy 5.9.2: Encourage mixed-use development which provides for activity and natural surveillance after commercial business hours through the development of ground floor retail uses and sidewalk cafes. Mixed-use should also be enhanced by locating community facilities such as libraries, cultural facilities or police substations, on the ground floor of such building, where feasible

The proposed project complies with the aforementioned goals, objectives, and policies. The addition of new commercial, restaurant and office uses and live-work uses would complement the Arts District neighborhood that is developed with a variety of unique restaurants, artist galleries and production spaces, creative office space, live-work units, and boutique retail shops. The project would enhance the livability of the neighborhood with the addition of new ground floor commercial uses that would draw patrons to the site and which builds upon the mix of uses already found in the area. In addition, pedestrian paseos are proposed through the site located between Bay Street and Sacramento Street and would facilitate resident connectivity from the commercial uses to the residential live-work units and amenity spaces. In addition, the project provides substantial landscaping, new street trees, and courtyard areas within the readapted warehouse shed that may include outdoor dining opportunities for ground floor restaurants.

Chapter 6: Open Space Chapter

Objective 6.2: Maximize the use of the City's existing open space network and recreation facilities by enhancing those facilities and providing connections, particularly from targeted growth areas, to the existing regional and community open space system.

Policy 6.4.7: Consider as part of the City's open space inventory of pedestrian streets, community gardens, shared school playfields, and privately-owned commercial open spaces that are accessible to the public, even though such elements fall outside the conventional definitions of "open space." This will help address the open space and outdoor recreation needs of communities that are currently deficient in these resources.

The project would include publicly accessible paseos that includes a walking path, green space, gathering areas, an amphitheater and outdoor dining for the public, office and residential users, terraces for residential and office patrons and rooftop open space and amenities for residential patrons. The ground floor open space is accessed by landscaped pedestrian paseos that connect Bay Street and Sacramento Street with two access points along Bay Street and one along Sacramento.

Chapter 7: Economic Development Chapter

Goal 7A: A vibrant economically revitalized City.

The proposed project would replace a surface parking lot and a 4,000 square-foot manufacturing building with a mixed-use development containing 110 live-work units, including needed affordable units, approximately 50,848 square feet of new commercial space (that may include retail and/or restaurant floor area), and approximately 113,350 square feet of creative office space. The project will generate over 600 new on-site jobs and enhance the city's tax base helping to promote a vibrant economy. In addition to office space, restaurant space, and live-work units, the creative office and live-work units can contain small businesses and home-based occupations that allow the hiring of up to five employees within each unit, which will further contribute to meeting this goal.

Goal 7B: A City with land appropriately and sufficiently designated to sustain a robust commercial and industrial base.

Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.

Policy 7.2.3: Encourage new commercial development in proximity to rail and bus transit corridors and stations.

Policy 7.2.9. Limit the redesignation of existing industrial land to other land uses except in cases where such redesignation serves to mitigate existing land use conflicts, and where it meets the criteria spelled out in Policy 3.14.6 of Chapter 3: Land Use.

The project will further the above goal, objective and policies through the introduction of 110 live-work units, including needed affordable units, approximately 50,848 square feet of retail and restaurant space, and approximately 113,350 square feet of creative office space that can accommodate modern industrial needs with varying floor plate sizes. The live-work units will be designed to comply with Section 419 of the Building Code and will be able to accommodate up to five employees in each unit. The units are designed to be larger than average with taller floor to ceiling heights to accommodate arts and production uses and a minimum 150 square-foot designated work area in each unit. Additionally, the project provides a range creative office spaces, including smaller spaces designed to accommodate small businesses. These features will promote job creation and economic growth, strengthen the commercial sector, and contribute to a better balance of land uses that meets the needs of residents.

According to the Central City North Community Plan, there are 1,180 acres (approximately 60 percent of the 2,005-acre total) of industrially zoned property in the Plan area. The project site comprises only 1.78 acres, or 0.15 percent of the industrially zoned property and 0.09 percent of the total land in the Plan area. Therefore, after approval of the

recommended General Plan Amendment and Zone Change, there will be more than adequate quantities of land for emerging industrial sectors.

General Plan Framework Policy 3.14.6 provides for the potential re-designation of marginal industrial lands for alternative uses by amending the community plans based on specified criteria, including: (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 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; (d) 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; and/or (e) 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.

The above criteria are met with respect to the project. The subject property is a vacant site containing a small manufacturing building that due to its limited size cannot accommodate modern industrial needs, a vacant shed and surface parking lot (and have been since at least 2014). Development of the project will not result in a fragmented pattern of development. For example, the surrounding urban environment is comprised of a mix of industrial buildings, warehouses, residential lofts, commercial/retail, office, restaurant, parking, and neighborhood amenities. Additionally, the subject site is located adjacent to restaurants, cafés and coffee shops, and the sites located immediately to the east and west of the subject property are either developed or are in the process of being developed with creative office or mixed use projects. Development of the project allows for a mix of uses on the subject site compatible with the surrounding development.

The subject site represents only 0.15 percent of the industrially-zoned property and 0.09 of the total land in the Plan area. In addition, the project will result in a development capable of generating more jobs than the current uses on site given that the site is currently vacant (since 2014). Therefore, development of the project 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.

The Industrial Land Use Policy (ILUP) does not preclude City Council approval of the recommended Zone Change and General Plan Amendment. With respect to the subject site, the ILUP's 2007 analysis no longer reflects the economic trends that have transformed land uses in the surrounding area, which has evolved to include numerous live-work and commercial developments. In fact, the draft DTLA2040 Plan better captures this transformation of the area and designates the project site as a Hybrid Industrial area, with a proposed FAR of 3:1 to 6:1, for creative office, live-work, manufacturing, and production activity, consistent with the Project. The ILUP, as it states, was meant to serve as a guidance document and not as required policy. The ILUP stated that if unique circumstances existed to approve a change of use or zone in an 'Employment Protection District' the findings for such determination under Policy 3.14.6 of the Framework Land Use Policies must be clearly articulated and the project should be required to incorporate community benefits. In this instance, findings have been made demonstrating the changing character of the district and the area's unique identity as an economic hub near mass transit and downtown, an employment hub, and in addition has established various community benefits, such as open space, infrastructure improvements, affordable housing, and job-producing space, that exceeds the amount recommended by the ILUP.

Furthermore, the ILUP was never adopted by the City Council and in no way limits the City Council's ability to exercise its legislative authority to approve the recommended Zone Change and General Plan Amendment.

Goal 7D: A City able to attract and maintain new land uses and businesses.

The project will further the above goal through the introduction of up to 50,848 square feet of restaurant and retail space and 113,350 square feet of creative office space. In addition, the live-work units will be designed to comply with Section 419 of the Building Code and will be able to accommodate up to five employees in each unit. The units are designed to be larger than average with taller floor-to-ceiling heights to accommodate arts and production uses and a minimum 150 square-foot designated work area in each unit. Additionally, the project provides a range creative office spaces, including smaller spaces designed to accommodate small businesses.

Goal 7G: A range of housing opportunities in the City.

The project will provide a range of housing opportunities in the form of 110 live-work units, including Very Low Income affordable units, within studio, one- and two-bedroom configurations.

Housing Element

The Housing Element 2013-2021 was adopted on December 3, 2013 and identifies the City's housing conditions and needs, and establishes the goals, objectives and policies that are the foundation of the City's housing and growth strategy. The mixed-use project is consistent with several objectives and policies of the Housing Element. The plan text includes the following relevant housing objectives and policies:

Objective 1.1: Produce an adequate supply of rental and ownership housing in order to meet current and projected needs.

Policy 1.1.2: Expand affordable rental housing for all income groups that need assistance.

Policy 1.1.3: Facilitate new construction and preservation of a range of different housing types that address the particular needs of the city's households.

Objective 1.3: Forecast and plan for changing housing needs over time in relation to production and preservation needs.

Policy 1.3.5: Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within the City to meet the projections of housing needs, according to the policies and objectives of the City's Framework Element of the General Plan.

The proposed General Plan Amendment to Commercial Industrial would increase the land area available for the production of live-work housing near jobs-rich Downtown. The project would provide new housing stock, contributing towards the Mayor's Initiative to provide 100,000 housing units by 2020, while also retaining a focus on jobs producing uses. The proposed project would provide 110 live-work residential units, including 11 percent of the density set aside as restricted affordable units, without directly displacing any existing housing or residents. The project would provide unique housing opportunities that are designed to accommodate arts production and small businesses within the units.

Objective 2.2: Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit.

Policy 2.2.3: Promote and facilitate a jobs/housing balance at a citywide level.

Objective 2.5: Promote a more equitable distribution of affordable housing opportunities throughout the City.

Policy 2.5.2: Foster the development of new affordable housing units citywide and within each Community Plan area.

The proposed project will introduce new live-work residential units in an area with a limited housing stock. The project is adjacent to Downtown and located near transit, amenities and jobs. The project will provide 110 live-work residential units, including 11 percent of the density set aside as restricted affordable units, while also providing resident production space, creative office space, and restaurant/retail space on site. The mix of uses and affordability levels will contribute towards a sustainable neighborhood and a jobs/housing balance. The project will provide much needed affordable housing and a unique opportunity for affordable live-work units.

Central City North Community Plan

The Central City North Community Plan, one of 35 Community Plans that the Land Use Element of the General Plan is comprised of, was adopted on December 15, 2000 with an update currently underway (DTLA 2040). The Community Plan designates the uses of land and is intended to guide development in order to create a healthful, pleasant environment. The existing district that comprises the area around the Arts District consists of a mix of buildings and uses with varied scale with industrial and storage uses, live-work uses, pockets of pedestrian-oriented commercial development that include creative office, restaurant, retail, and artist uses. The transition of allowable uses in the Arts District and adjacent areas started as far back as 1981, with each new development or adaptive reuse project in the area with a live-work component requiring discretionary review. As a result, the area has seen an increase in the conversion of industrial buildings to live-work units and studios, as well as some new, mixed-use and residential construction on land designated for Commercial uses, primarily located in the northern end of the Arts District adjacent to the Little Tokyo/Arts District Metro Gold Line Station. Within the immediate neighborhood, there are adaptive reuse buildings with live-work units and ground floor commercial spaces.

The Community Plan goals and objectives include: preserving and enhancing the positive characteristics of existing residential neighborhoods while providing a variety of housing opportunities with compatible new housing; 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.

The project site is within the Alameda East Redevelopment Study area, an area that the Community Plan recognizes as a blighted area that could be developed into a modern industrial area. The proposed project, with creative office that can provide a variety of

floor plates to accommodate modern industry and live-work units as well as retail commercial within a cluster-like campus, furthers that identified opportunity.

The project, which would provide a mixed-use live-work/commercial/office development, would conform to the goals, objectives, and land uses identified in the Community Plan. The plan text includes the following relevant residential and commercial land use objectives and policies:

> *Objective 1-1: To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Central City North Plan area to the year 2010.*
>
> *Objective 1-2: To locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities.*
>
> *Policy 1-2.1: Encourage multiple residential development in commercial zones.*
>
> *Objective 1-4: To promote and insure the provision of adequate housing for all persons regardless of income, age, or ethnic background*
>
> *Policy 1-4.1: Promote greater individual choice in type, quality, price, and location of housing.*
>
> *Policy 1-4.2: Ensure that new housing opportunities minimize displacement of the existing residents.*

The proposed project would provide 110 live-work units with 10 percent of the units (11 units) reserved for Very Low Income Households and will not displace any existing housing or residents. The units will vary in size and will be constructed to meet the building code requirements for live-work units, providing unique housing and economic opportunities to meet the needs of the existing and projected population of Central City North.

Vehicular trips will be reduced through the mix of uses offered onsite, the proximity to nearby jobs, commercial uses, restaurants and entertainment, and the proximity to transit. The residents of the proposed project would have access to a variety of transit options nearby including the Metro Rapid Bus No. 760, which runs north-south along Santa Fe with the closest stop at Olympic Boulevard at approximately 1,700 feet to the southern boundary of the Project at Sacramento Street and three MTA Local Bus Lines, including lines 60 with stops at Santa Fe and 8th Street and at Santa Fe and Violet Street and Metro Lines 18 and 62 stops at Santa Fe and 7th Street. 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 a half mile west of the Project Site on 7th Street, which provides inter-city bus service to various locations outside of the Los Angeles area. In addition, Metro is currently considering extending both the Santa Ana Line and Purple Line through the Arts District, and is considering multiple stations in the project vicinity.

> *Objective 2-1: To conserve and strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services.*

Objective 2-2: To attract uses which strengthen the economic base and expand market opportunities for existing and new businesses.

Policy 2-2.2: New development needs to add to and enhance existing pedestrian street activity.

Policy 2-2.3: Require that the first floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses.

The proposed project is a mixed-use development that includes 110 live-work units, approximately 50,848 square feet of restaurant space and retail space, and approximately 113,350 square feet of office space. The addition of new commercial uses in the form of creative office and retail/restaurant opportunities would complement the recent development trend in the Arts District and would further strengthen the commercial viability of the neighborhood. The live-work units will provide unique opportunities for an array of uses, including artists and small businesses. The proposed live-work units will not be restricted to artists but will support the artists-in-residence community by providing new units with larger than average unit sizes, open floor plans, and on-site production spaces.

The project is designed to create a strong street wall with continuous, uniform setbacks along Sacramento Street and Bay Street and an active ground floor, which will enhance pedestrian activity near the site. The existing site conditions include a large surface parking lot with a non-descript manufacturing building, and a lack of landscaping and pedestrian sidewalks (along Bay Street). The proposed mixed-use project will greatly enhance the pedestrian experience by improving street and sidewalk conditions, adding street trees, locating retail, office, and restaurant on the ground floor, and adding public open space such as plazas and paseos adjacent to the street. The project will reduce the amount of curb cuts to just two main driveways (and two secondary loading driveways) and will locate parking in three subterranean levels.

Goal 3: Sufficient land for a variety of industrial uses with maximum employment opportunities which are safe for the environment and the work force and which have minimal adverse impact on adjacent uses.

Objective 3-1: To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.

Objective 3-2: Encourage the continued development and maintenance of the artists-in-residence community in industrial areas of the proposed redevelopment plan areas and of the plan, as appropriate.

The subject property currently contains a distribution warehouse building. The proposed project will further these goals through the introduction of 110 live-work units, including needed affordable units, approximately 50,858 square feet of retail and restaurant space, and approximately 113,350 square feet of creative office space. The units will be constructed to be larger than average with taller floor to ceiling heights to accommodate arts and production uses and a minimum 150 square-foot designated work area in each unit. Additionally, the project provides a range of creative office spaces, including smaller spaces designed to accommodate small businesses.

As the proposed project has the potential to generate 662 permanent jobs on site (please see Table IV.I-3 of page IV.I-9 of the Draft EIR) than the existing uses (even without

counting the potential for up to five employees in each live-work), the project is consistent with the Community Plan's objectives to preserve and increase employment opportunities in the area.

According to the Central City North Community Plan, there are 1,180 acres (approximately 60 percent of the 2,005-acre total) of industrially zoned property in the Plan area. The project site comprises only 1.78 acres, or 0.15 percent of the industrially-zoned property and 0.09 percent of the total land in the Plan area. Therefore, after approval of the recommended General Plan Amendment and Zone Change, there will be sufficient land for a variety of industrial uses in the Community Plan area.

Urban Design

As proposed, the project would comply with the Urban Design policies in Chapter 5 of the Community Plan with respect to site planning, height and building design, parking structures, and landscaping.

Site Planning

- Locating surface parking to the rear of structures;
- Minimizing the number of widths of driveways providing sole access to the rear of commercial lots;
- Maximizing retail and commercial service uses along frontages of commercial developments;
- Providing front pedestrian entrances for businesses fronting on main commercial streets;
- Providing through arcades from the front of buildings to rear parking for projects within wide frontages;
- Providing landscaping strips between driveways and walkways accessing the rear properties;
- Requiring site plans which include ancillary structures, service areas, pedestrian walkways, vehicular paths, loading areas, drop off and landscaped areas;
- All multi-family residential projects of five or more units shall be designed around a landscaped focal point or courtyard to serve as an amenity for residents

The project proposes pedestrian mid-block paseos on the ground level with direct access through the project site from Sacramento Street and Bay Street that is surrounded by the project's proposed retail uses and restaurant uses. The pedestrian paseos would include landscaping, hardscape and seating areas that will be accessible to the public.

The ground level of the buildings will contain retail and restaurant uses along the paseos as well as the street frontages of Sacramento Street and Bay Street, further activating pedestrian circulation around and through the site. Each commercial space would be accessed directly from the paseos and Sacramento and Bay Streets. The proposed parking is subterranean and will not be visible from surrounding streets.

Height and Building Design

- Requiring the use of articulations, recesses, surface perforations, and porticoes to break up long, flat building facades;
- Providing accenting, complimentary building materials to building facades;
- Maximizing the applications of architectural features or articulations to building facades;
- Designating architecturally untreated facades for signage;
- Screening of mechanical and electrical equipment from public view;

- Requiring the enclosure of trash areas for all projects;
- Requiring freestanding walls to use articulation, recesses, surface perforations, porticoes to break up long freestanding walls.
- Utilizing of complementary building materials in building facades;
- Integrating building fixtures, awnings, security gates, etc. into the design of a building;
- Screening all rooftop equipment and building appurtenances from adjacent properties.

Parking Structures

- Designing parking structure exteriors to match the style, materials and colors of the main building;
- Maximizing commercial uses, if appropriate, on the ground floor;
- Landscaping to screen parking structures not architecturally integrated with the main building;
- Utilizing decorative walls and landscaping to buffer residential uses from parking structures.

The building has been designed to complement the industrial concept of the surrounding Arts District's buildings in the neighborhood. The project has been broken up into three buildings with the smaller scale 6-story creative office building fronting both Sacramento and Bay Street along the eastern portion of the site and the 11 story live-work building fronting Sacramento Street and the two story adaptive reuse warehouse fronting Bay Street, to allow for an integrated development with a variety of massings and scale to reflect the diverse building types in the immediate area. The ground floors are differentiated from the upper levels with softer and lighter concrete treatments and ample transparency that complement the proposed street level landscaping and draw daylight into the proposed paseos. The upper floors feature a darker concrete panel finish and corrugated metal with metal windows and doors with varying façade planes and proportions to create a sense of architectural interest that also complement the ground floor materials and respond to the warehouse loft neighborhood character in the area. Upper floor terraces in the creative office building create additional architectural interest in the building and modulate the building mass along the length of the street frontages. The paseos are designed to be visible from the street and creates an invitation to explore the amenities of the project. The underground parking is entirely not visible from the public right-of-way and from the ground floor paseos which further enhances the street experience. Trash receptacles would be located within the parking garage and not visible to the public, while rooftop mechanical equipment would be screened from public view.

Mobility Plan 2035

The Mobility Plan was adopted on August 11, 2015 and last amended on September 7, 2016. The proposed project will implement the following policies contained within the Mobility Plan:

> *Policy 2.3 Pedestrian Infrastructure: Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.*
>
> *Policy 3.3 Land Use Access and Mix: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.*

Policy 3.8 Bicycle Parking: Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.

The proposed project will greatly improve the pedestrian experience along Bay Street and Sacramento Street. The existing site conditions include a large surface parking lot with a lack of landscaping, a vacant, warehouse building and a non-descript 4,000 square-foot manufacturing building. The project will comply with the Collector standards for Bay Street and for Sacramento Street. Pedestrian activity will also be improved with the incorporation of street trees along Bay and Sacramento Street, and the addition of public open space, including paseos between Sacramento and Bay Streets. Bay and Sacramento Streets and the paseo are all lined by active uses including restaurant and retail space.

The proposed project will locate much needed housing near jobs-rich Downtown. The location of the proposed project near jobs, entertainment, and transit as well as the mix of uses on-site and live-work units will reduce the number of vehicle trips. The project will also provide 180 bicycle parking spaces, including 48 short-term spaces and 132 secured, long-term spaces.

Air Quality Element

The Air Quality Element of the General Plan will be implemented by the recommended action herein. The Air Quality Element sets forth the goals, objectives and policies which will guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element recognizes that air quality strategies must be integrated into land use decisions and represent the City's effort to achieve consistency with regional Air Quality, Growth Management, Mobility and Congestion Management Plans. The Air Quality Element includes the following Goal and Objective relevant to the instant request:

Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and tree planting.

Objective 5.1: It is the objective of the City of Los Angeles to increase energy efficiency of City facilities and private developments.

The project is energy efficient through its provision of electric vehicle parking, 2,000 square-feet of electric solar panels, provision of ample trees and its proximity to public transit and Downtown Los Angeles, a jobs-rich regional hub.

The Sewerage Facilities Element

The Sewerage Facilities Element of the General Plan will not be affected by the recommended action. While the sewer system might be able to accommodate the total flows for the Proposed Project, further detailed gauging and evaluation may be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the project.

Health and Wellness Element

Adopted in March 2015, the Plan for a Healthy Los Angeles lays the foundation to create healthier communities for all Angelenos. As the Health and Wellness Element of the General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. Through a new focus on public health from the perspective of the built environment and City services, the City of Los Angeles will strive to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement. The Proposed Project is consistent with the following goals, objectives and policies:

Chapter 2: A City Built for Health

Policy 2.2: Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools, practices, and programs.

The Project will provide public open space and improve pedestrian circulation around and through the building via several public paseos that will connect Bay Street and Sacramento Street. The public paseos will be open to the sky, and create a flexible open space for the public which also allows pedestrian circulation at the ground level through mid-block crossings. The public paseos will be a social space able to host a variety of uses including outdoor dining, outdoor seating, bike parking, and neighborhood circulation to and from the adjacent spaces, all positioned to activate the space, which will make a positive contribution to the neighborhood where there is currently a lack of public open space in the immediate vicinity. The Project will also include open space in the form of extensively landscaped residential amenity decks.

Chapter 5: An Environment Where Life Thrives

Policy 5.1: Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.

Policy 5.7: Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and other susceptible to respiratory diseases.

The Project will result in the creation of new housing coupled with new office and commercial uses while rehabilitating an existing industrial use within proximity of public transit. Future visitors, employees, and residents of this Project, as well as people who already live and work in the area, will be able to take advantage of the Project's mix of land uses which include wholesale, retail, office, and residential within proximity to transit to serve their daily needs. Dining, entertainment, and other amenities, such as amenity decks, lounge areas, and a recreation room, will encourage and allow for socializing on-site. Furthermore, street trees will be introduced along both Bay and Sacramento Streets, improving the pedestrian realm. The Project's proximity to 7th / Metro Center and Pershing Square Metro Stations and other transit options will encourage residents, patrons and visitors to use public transportation or walk, thus reducing air pollution and greenhouse gas emissions that would otherwise be caused by vehicle trips. The Project's public paseo and ground floor commercial uses, within proximity to the above-referenced

transit options, will sustain street level interest and promote pedestrian activity with linkages to the transit network.

2. **Charter Compliance - City Charter Section 555 (General Plan Amendment).**

The proposed General Plan Amendment complies with the procedures as specified in Section 555 of the Charter, including:

Amendment in Whole or in Part. The General Plan Amendment before the City Planning Commission represents an Amendment to the Central City North Community Plan, which is a change to the social, physical and economic identity of project site, which is currently designated as Heavy Industrial for the entire site. The part of the General Plan being amended has significant social, economic and physical identity. The project site is located in the Arts District, a neighborhood originally planned and zoned for industrial uses that has significant social, economic and physical identity as it is evolving to include new residential, commercial, and mixed-use developments and converted industrial space. The project proposes a General Plan Amendment from Heavy Industrial to Commercial Industrial in addition to a Zone Change to Commercial Manufacturing. The project site meets the Economic Chapter of the Framework Element's criteria for such lands to be converted, as it is unlikely that the Project Site could in fact attract any viable industrial use given its size limitation at 1.78 acres, as well as the limited size of the existing vacant manufacturing building (since 2014) that is approximately 4,000 square feet which cannot offer a variety of floor plates to accommodate modern industry and does not provide the basic design standards to convert such a building for live-work uses, nor does it employ the standards needed for a green building. The small manufacturing building fronting Sacramento Street contains no finished walls or ceiling and roof trusses are visible, thereby unable to accommodate any viable modern industrial use. The project site consists of a large, industrial, shed-like structure that serves as a surface parking lot and contains no electrical wiring, plumbing or finished walls, thus also unable to accommodate any viable industrial uses. Furthermore, as stated in the Central City North Community Plan, the project site is within the Alameda East Study area which as is stated by the community plan, is less than desirable for "modern" industrial activity. These deficiencies include the physical condition of the streets, loading and unloading activities, and parking conditions. Other difficulties include poor design of intersections, the presence of dead end streets (both Bay and Sacramento Streets in this case), and the lack of continuous north/south corridors.

The project will remove the existing building and replace it with a mixed-use development containing 110 live-work units, including needed affordable units, approximately 50,848 square feet of retail and restaurant space, and approximately 113,350 square feet of creative office space. While the proposed General Plan Amendment will change an industrial land use designation, the project is still oriented around the production of jobs given that the project includes new office space and at least 150 feet of each dwelling unit able to accommodate small businesses, which will contribute to the significant economic identity of the area.

Significant Economic Identity

The surrounding neighborhood has a significant economic identity from the industrial uses that have historically populated the area. As that economy has evolved, heavy manufacturing uses are evolving to more digital and creative uses. This project is in keeping with this economic identity and evolution as it replaces a small manufacturing facility and large surface parking lot with limited employment opportunity with a project that will activate the area through the introduction of live-work units, including needed affordable units, restaurant space and retail space, and creative office space. In addition, the live-work

units are designed to be larger than average with taller floor to ceiling heights to accommodate arts and production uses and a minimum 150 square-foot designated work area in each unit that allow up to five employees in each unit. Additionally, the project provides a range of creative office spaces, including smaller spaces designed to accommodate small businesses.

Significant Physical Identity
The proposed project also has significant physical identity as a mixed-use project near regional transit in the Los Angeles area. The project site is located within an area of Los Angeles which is well-served by local and regional transit lines and is located in a Transit Priority Area. The project area is currently served by the Metro Rapid Bus No. 760, which runs north-south along Santa Fe with the closest stop at Olympic Boulevard at approximately 1,700 feet. to the southern boundary of the Project at Sacramento Street and three MTA Local Bus Lines, including lines 60 with stops at Santa Fe and 8th Street and at Santa Fe and Violet Street and Metro Lines 18 and 62 stops at Santa Fe and 7th Street. 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 a half mile west of the Project Site on 7th Street, which provides inter-city bus service to various locations outside of the Los Angeles area. In addition, Metro is currently considering extending both the Santa Ana Line and Purple Line through the Arts District, and is considering multiple stations in the project vicinity. The project is also located within 0.3 miles of Metro's Bike Share system with a "Dock Point" located on Imperial Street at 7th.

Significant Social Identity
Furthermore, the proposed project provides the opportunity for significant pedestrian connections with proximity to jobs, including walking distance to the recently constructed Soho House project, of which the uses include a 1,529-square-foot, 71-seat music performance room,13,865-square foot, 800-seat public market, restaurant, bar and backyard area, a 2,925-square-foot, 39-seat spa and salon, 3,868-square-foot seat gym area and flexible event space and 48 hotel rooms) located adjacent to the project on Bay Street. The proposed project will contribute to the recent development of economic activity in this area by designing a project that will foster job production, while also introducing new live-work units in a manner that preserves the surrounding industrial and artistic character. The live-work units will support city-wide goals of increasing the housing stock while doing so in a way that is compatible with the surrounding context. The project will facilitate a wide range of jobs from the live-work units to the creative office space. As such, the proposed General Plan Amendment will contribute to and strengthen the social and economic identity of the surrounding area.

Nothing in the City Charter, including Section 555, imposes a minimum geographic size restriction on General Plan Amendments or otherwise restricts the City Council from approving the proposed Zone Change and General Plan Amendment. Charter 555 does not contain a limitation that the "geographic area" cannot include specific parcels, or that the geographic area necessarily must be a recognized part of the city, a physically constrained area, or an economic hub. Charter 555 does not preclude a site-specific amendment as long as, as demonstrated above, the geographic area "involved has significant social, economic or physical identity."

3. **City Charter Finding 556.**

When approving any matter listed in Section 558, the City Planning Commission and the Council shall make findings showing that the action is in substantial conformance with the purposes, intent and provisions of the General Plan. If the Council does not adopt the City Planning Commission's findings and recommendations, the Council shall make its own findings.

The project site is located within the Central City North Community Plan, which is one of 35 community plans comprising the Land Use Element of the General Plan. The Community Plan designates the project site with the Heavy Industrial land use designation, corresponding to the M3 Zone. The site is presently zoned M3-1-RIO and is thus consistent with the existing land use designation.

As initiated, the amendment would re-designate the project site from Heavy Industrial to Commercial Industrial land uses, which lists the following corresponding zones: CM and P. The requested zone and height district change to (T)(Q)CM-2-RIO for the project site would be consistent with the adoption of the recommended plan amendment. The development of the project represents an opportunity to achieve the overarching goals of the Central City North Community Plan, which include improving the function, design, and economic vitality of the commercial corridors and uses a development opportunity site for needed job-producing uses and housing that will improve the economic and physical condition of the surrounding area. The project will also contribute to the goals of the Housing Element by expanding the rental live-work housing stock, providing affordable housing, and contributing to a range of housing types by providing unique live-work units. The project also meets Mobility Element goals by removing a vacant site and introducing a project with active ground floor uses, public open spaces, improved sidewalks, street trees, and on-site bicycle parking.

Further, the proposed project meets Objective 7.2 of the Framework Element ("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"), by providing office, restaurant and live-work uses. Further, Chapter 3, Land Use, of the Framework Element states: "As indicated in the Economic Development Chapter of the Framework Element, some existing industrially zoned lands may be inappropriate for new industries and should be converted for other land uses." The project site meets the Economic Chapter of the Framework Element's criteria for such lands to be converted, as it is unlikely that the Project Site could in fact attract any viable industrial use given its size limitation at 1.78 acres, as well as the limited size of the existing vacant manufacturing building (since 2014) that is approximately 4,000 square feet which does not allow for a variety of floor plates to accommodate modern industry and does not offer the basic design standards to convert such a building for live-work uses, nor does it employ the standards needed for a green building. The small manufacturing building fronting Sacramento Street contains no finished walls or ceiling and roof trusses are visible, thereby unable to accommodate any viable modern industrial use. The project site also consists of a large, industrial, shed-like structure that serves as a surface parking lot and contains no electrical wiring, plumbing or finished walls, thus unable to accommodate any viable industrial uses. Furthermore, as stated in the Central City North Community Plan, the project site is within the Alameda East Study area which as is stated by the community plan, is less than desirable for "modern" industrial activity. These deficiencies include the physical condition of the streets, loading and unloading activities, and parking conditions. Other difficulties include poor design of intersections, the presence of dead end streets (both Bay and Sacramento Streets in this case), and the lack of continuous north/south corridors. The proposed General Plan Amendment will enable such a conversion.

As indicated in the *Economic Development* Chapter of the Framework Element, where such lands are to be converted from Industrial use, their appropriate use shall be the subject of future planning studies. This is satisfied in several ways. First, the entire project approval process, including the CEQA process, the entitlement process, and the various points therein for public comment form a planning study themselves. The CEQA process included an Environmental Impact Report, which assessed the surrounding land uses, as well as an analysis of the proposed land use in relation to the General Plan and the LA CEQA Guidelines threshold for land use compatibility. The entitlement process further analyzed in detail the Goals and Policies of the General Plan, and demonstrated that the project met the overall intent of the General Plan. As demonstrated therein, the land use pattern, both in the immediate neighborhood of the subject property and in the larger Arts District, has already evolved from its historic industrial and manufacturing uses to residential, creative office, and related retail/cultural/entertainment uses alongside traditional industrial uses, reflecting larger employment and economic trends.

As such, the proposed amendment would be in substantial conformance with the purpose, intent, and provisions of the General Plan to strengthen the commercial and economic base of the Community Plan area. The condition requiring EV-ready parking spaces (installed with chargers) onsite will support the adoption of low and zero emission transportation fuel sources by the project's occupants and visitors. The condition requiring solar ready roofs will support the site's EV chargers and other site electrical uses to help reduce the site's dependence on fossil fuels and carbon generating public utility electrical power. Taken together, these conditions provide for the public welfare and public necessity by reducing the level of pollution or greenhouse gas emissions to the benefit of the neighborhood and City in response to General Plan Health and Wellness Element Policies 5.1 (reduce air pollution), 5.7 (reduce greenhouse gas emissions); Air Quality Element policy 4.2.3 (ensuring new development is compatible with alternative fuel vehicles), 5.1.2 (shift to non-polluting sources of energy in buildings and operations); Mobility Element Policy 4.1 (expand access to transportation choices) and 5.4 (encourage adoption of low emission fuel sources, new mobility technology and supporting infrastructure). The solar and EV conditions are also good zoning practice because they provide a convenient service amenity to the occupants or visitors who use electric vehicles and utilize electricity on site for other functions. As such, the Project provides recreational and service amenities to improve habitability for the residents and to minimize impacts on neighboring properties.

As detailed in Finding No. 3 above, the initiated General Plan Amendment complies with Los Angeles City Charter Section 556 in that it is in substantial conformance with the purposes, intent and provision of the General Plan and its elements, including the Framework Element, Housing Element, Mobility Element, Health and Wellness Element and the Land Use Element – Central City North Community Plan, as the Project would increase housing choices at varying income levels and different unit types; introduce new land uses while substantially increasing employment opportunities on the site; improve the jobs/housing ratio and economic vitality of the Arts District, while maintaining a safe and clean environment for Arts-District employees and residents; and enhance the pedestrian environment by activating ground floor uses and providing public paseos that will encourage the use of public open space, all within proximity to transit and Downtown, a regional employment hub.

4. **City Charter Finding 558. The proposed Amendment to the Central City North Community Plan will be in conformance with public necessity, convenience, general welfare and good zoning practice.**

The proposed Amendment to the Central City North Community Plan will be in conformance with public necessity, convenience, general welfare and good zoning practice.

The proposed amendment to the Central City North Community Plan would re-designate the project site from Heavy Industrial to Commercial Industrial. The amendment, in conjunction with the requested zone change and height district change to (T)(Q)CM-2-RIO, would allow for the removal of an existing parking lot and manufacturing building for the development of a mixed-use project containing 110 live-work units, public open space, approximately 50,848 square-feet of restaurant space and retail space, and approximately 113,350 square feet of creative office space. The project will have a total floor area ratio of 3.9:1 and the live-work building will have an overall height of 139 feet and the secondary creative office building will have a height of 78 feet, six inches.

Public necessity, convenience and general welfare will be better served by approving the proposed General Plan Amendment and corresponding Zone and Height District Changes, as they would allow a vacant industrial site to be redeveloped with a mixed-use project that will provide new live-work housing, including affordable units, near jobs-rich Downtown as well as new commercial floor area designed to accommodate restaurants and an array of creative office uses in a neighborhood that is transforming with the development of new residential and commercial uses. The proposed project site is in a Transit Priority Area (areas located within 0.5 mile of an existing or planned major transit stop, which includes the intersection of two or more bus routes having a service frequency interval of 15 minutes or less during peak commute periods) and is served by the Metro Rapid Bus No. 760, which runs north-south along Santa Fe with the closest stop at Olympic Boulevard at approximately 1,700 feet to the southern boundary of the Project at Sacramento Street and three MTA Local Bus Lines, including lines 60 with stops at Santa Fe and 8th Street and at Santa Fe and Violet Street and Metro Lines 18 and 62 stops at Santa Fe and 7th Street. 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 a half mile west of the Project Site on 7th Street, which provides inter-city bus service to various locations outside of the Los Angeles area. In addition, Metro is currently considering extending both the Santa Ana Line and Purple Line through the Arts District, and is considering multiple stations in the project vicinity. The project will provide public open space and improved sidewalks with street trees. The proposed project will be lined by retail and restaurants, contain creative office spaces, and live-work units and parking will be in a subterranean garage, activating a site that currently contains a surface parking lot and a small manufacturing building with large blank walls, and fences.

The project provides job producing and live-work units in proximity to existing goods, services, and facilities. The site not only incorporates commercial uses that can serve its residents, as well as live-work units that combine residences with business uses, but is also close to new and proposed offices and commercial establishments providing residents the opportunity to walk to their destinations. Also, by locating live-work units close to major transit and the Downtown employment center and shopping areas and providing ample bicycle parking, the proposed project will facilitate resident's interaction with the community, bringing more people onto the street, without the need for their cars, and providing more customers for local businesses. It will create a public convenience by reducing reliance on the automobile, alleviating traffic congestion as a result.

The project is in conformity with public necessity, convenience, general welfare and good zoning practice because it includes necessary housing, including affordable housing, substantial infrastructure improvements, improved streetscapes, and public open space. The General Plan Amendment and Zone and Height District Changes will introduce a unique housing typology with new live-work units, including affordable units, each designed to accommodate up to five employees. The project will provide both housing and job opportunities in proximity to transit. The economic identity of this area continues to evolve from purely manufacturing uses to new hybrid uses that can accommodate digital and

creative uses. The proposed project provides much needed housing while also facilitating jobs in a changing economy. The proposed project will be a better use of the site and will improve the general welfare of the community and the City.

B. ENTITLEMENT FINDINGS

1. VESTING ZONE CHANGE, HEIGHT DISTRICT CHANGE AND "T" AND "Q" CLASSIFICATION:

a) Pursuant to Section 12.32 C of the Los Angeles Municipal Code, the recommended zone change and height district change is in conformance with the public necessity, convenience, general welfare and good zoning practice.

The requested Zone Change and Height District Change from M3-1-RIO to CM-2-RIO would allow for the development of a new mixed-use project containing 110 live-work units, public open space, approximately 50,848 square-feet of restaurant space and square feet of retail space, and approximately 113,350 square feet of creative office space. The total project will have a floor area ratio of 3.9:1 and the residential tower will have a maximum building height of 139 feet with the live-work building measuring approximately 139 feet in height.

Public Necessity. On April 8, 2015, Mayor Eric Garcetti released the City's first-ever Sustainable City pLAn. The pLAn is both a roadmap to achieve back to basics short-term results while setting the path to strengthen and transform our City in the decades to come. In it, the Mayor set forth a goal of creating 100,000 new housing units by 2021. The subject property is currently designated and zoned for Heavy Industrial, which prohibits residential uses. The Project Site is located in proximity to several existing and proposed residential and commercial developments providing a range of housing types, including artist lofts and employment opportunities. The surrounding urban environment is predominantly developed with newly constructed mixed-use live-work and office developments, industrial buildings that have been converted into live-work dwelling units, restaurants, and industrial uses. More recently, media and technology firms such as Hyperloop One (adjacent to the site to the east) have begun to establish creative offices in the area. In the immediate vicinity of the project site, the trend continues with projects such as the SoHo House, adjacent and east of the project site, a club, hotel and performance venue at 1000 Santa Fe, and at 2133 Bay Street, directly across the site is a repurposed 12,698 industrial building into creative office and diagonal to the site at 2149 Bay Street, is an Artist-in-Residence in a 9,848 square-foot industrial loft. Other nearby adaptive reuse projects along Sacramento Street include an 11,210 square-foot art gallery at 2116 Sacramento Street, a 4,960 square-foot music studio and art gallery at 1018 Santa Fe. The Proposed Project would contribute to the evolution of the surrounding area into a residential, commercial, and mixed-use area. The General Plan Amendment to Commercial Industrial in conjunction with the recommended Vesting Zone Change and Height District Change to (T)(Q)CM-2-RIO will allow for the establishment of residential and office uses on a Site that is compatible with the existing surrounding residential, light industrial and commercial development while providing neighborhood-serving ground floor commercial uses and expanding employment opportunities on the site. The Proposed Project would serve as a cluster of uses already existing in the area. The Proposed Project would provide 11 new housing units for a mix of incomes, including a voluntary set-aside of approximately 10 percent of the total units, or 11 units, for Very Low Income households, without the direct displacement of any existing housing units. Furthermore, the Project includes both private and public amenities that would improve the quality of life for existing and future residents.

Approval of the initiated General Plan Amendment from Heavy Industrial to Commercial Industrial would allow the Proposed Project to contribute to help alleviate the City's housing shortage by providing a mixed-income, mixed-use residential development, thus serving to address the City's housing shortage and need for affordable housing. In addition, the Proposed Project would make more efficient use of land by adding density without displacing any existing industrial uses. Locating both a greater residential density and neighborhood-serving commercial uses and office along major bus routes such as the Metro Rapid Bus No. 760, which runs north-south along Santa Fe with the closest stop at Olympic Boulevard at approximately 1,700 feet to the southern boundary of the Project at Sacramento Street and three MTA Local Bus Lines, including lines 60 with stops at Santa Fe and 8th Street and at Santa Fe and Violet Street and Metro Lines 18 and 62 stops at Santa Fe and 7th Street (which provide connections to the downtown subway stations, which include Pershing Square and 7th Street/Metro Center), would also greatly benefit the residents in offering efficient transit alternatives and contribute to building the critical mass necessary to support a more efficient regional transit system. The Proposed Project would accommodate projected population growth in the area, while being compatible with its surrounding uses. Accordingly, the initiated General Plan Amendment would be in conformity with public necessity.

Convenience. Approval of the initiated General Plan Amendment from Heavy Industrial to Commercial Industrial would facilitate the redevelopment of the existing vacant site with a new mixed-use development, while expanding housing, including affordable units, and employment opportunities on a Site that is proximate to public transit options. The Project density and scope are appropriate for the Site and the surrounding properties, as it locates needed residential density near several transit options that afford easy access to employment centers, entertainment, and services, creates new commercial uses for the neighborhood, promotes pedestrian activity in the general area, and provides a community gathering point with new recreational and open space amenities available to residents and the surrounding community. Accordingly, the initiated General Plan Amendment would result in a project that would provide a convenience to the Arts District and the City as a whole.

General Welfare. Approval of the initiated General Plan Amendment from Light Industrial to Community Commercial would allow the development of a mixed-use building containing office, commercial, and residential uses while expanding employment opportunities. As discussed above, the area is served by transit that would afford residents access to jobs, entertainment, and services within Downtown and the Greater Los Angeles region. As an infill development project, the initiated Amendment, will allow a residential and commercial development at a higher density near transit while providing neighborhood-serving commercial opportunities for future Project residents and the existing surrounding neighborhood; encourage mixed-use development that would allow for a cluster of uses reflective of the nearby area which contains a mix of industrial, residential, and commercial uses, including former industrial sites that have been redeveloped or replaced with arts-focused live-work projects within 0.5 mile, as noted in the related projects listed in Section III, Environmental Setting, Table III-2, of the Draft EIR and shown in Figure III-2 of the Draft EIR.; and increase the City's housing stock, while significantly expanding employment opportunities on-site. Additionally, the Proposed Project would activate and enhance the aesthetic character of an infill Site in an area serviced by transit. The Proposed Project includes 110 new housing units for a mix of incomes, including a voluntary set-aside of approximately 11 percent, or 12 units, for Very Low Income households, without the direct displacement of any existing housing units. The Project will further promote foot traffic through the use of a strong street wall, with storefronts along both Sacramento and Bay Streets, and will include public paseos that will connect Sacramento and Bay Street through a creative open space for pedestrians, in pair

with higher density living, creative office, and comfortable transitions to the neighboring uses. The existing buildings at the Project Site are generally in poor condition and in need of substantial maintenance and repair. The General Plan Amendment allows for the development of the Proposed Project, which will add a residential and office component to the Project Site, which will enable the renovation and reuse of the existing warehouse shed building, and will allow the Arts District to continue being a regional economic driver for the City of Los Angeles. Accordingly, the proposed General Plan Amendment would be in conformity with general welfare.

Good Zoning Practices. Approval of the initiated General Plan Amendment from Heavy Industrial to Commercial Industrial would allow for the site to be redeveloped with a mixed-use project that will provide new live-work housing that allows up to five employees in each unit, including affordable units, near jobs-rich Downtown and the budding Arts District as well as new commercial floor area designed to accommodate restaurants and creative office in a neighborhood that is transforming with the development of new residential and commercial uses. The proposed project site is in a Transit Priority Area and is served by the Metro Rapid Bus No. 760, which runs north-south along Santa Fe with the closest stop at Olympic Boulevard at approximately 1,700 feet to the southern boundary of the Project at Sacramento Street and three MTA Local Bus Lines, including lines 60 with stops at Santa Fe and 8th Street and at Santa Fe and Violet Street and Metro Lines 18 and 62 stops at Santa Fe and 7th Street. 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 a half mile west of the Project Site on 7th Street, which provides inter-city bus service to various locations outside of the Los Angeles area. In addition, Metro is currently considering extending both the Santa Ana Line and Purple Line through the Arts District, and is considering multiple stations in the project vicinity. The project will provide public open space and improved sidewalks with street trees. The proposed project will be lined by restaurants, creative office spaces, and live-work units on the ground floor and all parking will be subterranean, activating a site.

The project is in conformity with and good zoning practice because it includes necessary housing, including affordable housing, substantial infrastructure improvements, improved streetscapes, and public open space. The project will provide both housing and job opportunities in proximity to transit at a vacant industrial site.

Given the uses surrounding the Project Site, the Project's proposed General Plan Amendment from industrial to commercial industrial land use and commercial manufacturing zoning designations will not lead to impermissible spot zoning. The Project Site is approximately 1.78 acres and the nearby area contains a mix of industrial, residential, and commercial uses, including former industrial sites that have been redeveloped or replaced with arts-focused live-work projects within 0.5 mile, as noted in the related projects listed in Section III, Environmental Setting, Table III-2, of the Draft EIR and shown in Figure III-2 of the Draft EIR.

The economic identity of this area continues to evolve from purely manufacturing uses to new hybrid uses that can accommodate digital and creative uses. The proposed project provides much needed housing while also facilitating jobs in an area that can accommodate such uses. As part of the project, pedestrian paseos will allow for public movement through the site. In addition, the paseo will provide much-needed green space and public gathering areas. Therefore, the initiated General Plan Amendment to Commercial Industrial would be consistent with nearby land uses and zones, would facilitate the ongoing transformation of the area into a mixed-use district and would be in conformity with good zoning practices and development patterns in the immediate area.

b) "T" and "Q" Classification Findings

Per LAMC Section 12.32-G,1 and 2, the current action, as recommended, has been made contingent upon compliance with new "T" and "Q" conditions of approval imposed herein for the proposed project. The "T" Conditions are necessary to ensure the identified dedications, improvements, and actions are undertaken to meet the public's needs, convenience, and general welfare served by the actions required. These actions and improvements will provide the necessary infrastructure to serve the proposed community at this site. The "Q" conditions that limits the scale and scope of future development on the site are also necessary to protect the best interests of and to assure a development more compatible with surrounding properties and the overall pattern of development in the community, to secure an appropriate development in harmony with the General Plan, and to prevent or mitigate the potential adverse environmental effects of the subject recommended action.

2. SITE PLAN REVIEW

In order for the Site Plan Review to be granted, all three of the legally mandated findings delineated in Section 16.05-F of the Los Angeles Municipal Code must be made in the affirmative.

a. **The project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan.**

The proposed Project proposes to redevelop a vacant site consisting of a small manufacturing building, warehouse shed and large surface parking lot with a mixed-use live-work development comprising 110 live-work units and up to approximately 164,198 square feet of commercial retail and creative office space with a maximum height of 149 feet. The project proposes to reuse the existing warehouse shed as part of its retails commercial development space. Off-street parking will be provided below grade and screened from view within three subterranean parking levels.

As discussed in Finding No. 2, the recommended project would be consistent with the purposes, intent and provisions of the General Plan and its elements, including the Framework Element, Housing Element, Mobility Element, Health and Wellness Element and the Land Use Element – Central City North Community Plan, as it would provide mixed-income housing opportunities, supporting the City's desire for more affordable housing options by voluntarily reserving 11 percent of the units for Very Low Income households; is providing creative office space thereby increasing employment opportunities in an area designated for jobs-producing uses, is located in proximity to several mass transit options, qualifying as a Transit Priority Project, ideal for those wishing to live in the urban environment of Downtown Los Angeles and in close proximity to regional employment centers; and would increase housing choices for Arts-District employees and residents, promote joint live/work housing, maintain a safe and clean environment, support the neighborhood with retail services needed for area new residents, workers, and visitors, and activate the streets with more pedestrians while bringing improvements to the Arts District, while strengthening the commercial base in the Arts District as well as Downtown Los Angeles and facilitating the expansion of housing choices in order to attract new and diverse households.

b. **The project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements that is or will be compatible with existing and future development in neighboring properties.**

The arrangement of the proposed development is consistent and compatible with existing and future development on neighboring properties. The subject site is located within the Central City North Community Plan Area and is in the Arts District neighborhood. The surrounding urban environment is predominantly developed with newly constructed mixed-use live-work and office developments, industrial buildings that have been converted into live-work dwelling units, restaurants, and industrial uses. More recently, media and technology firms such as Hyperloop One (adjacent to the site to the east) have begun to establish creative offices in the area. In the immediate vicinity of the project site, the trend continues with projects such as the SoHo House, adjacent and east of the project site, a club, hotel and performance venue at 1000 Santa Fe, and at 2133 Bay Street, directly across the site is a repurposed 12,698 industrial building into creative office and diagonal to the site at 2149 Bay Street, is an Artist-in-Residence in a 9,848 square-foot industrial loft. Other nearby adaptive reuse projects along Sacramento Street include an 11,210 square-foot art gallery at 2116 Sacramento Street, a 4,960 square-foot music studio and art gallery at 1018 Santa Fe.

The proposed Project is comprised of a type 1 construction, a six-story creative office building at 78 ½ feet in height and a residential building at 139 feet. The mixed-use buildings will encompass live-work units, retail and restaurant spaces, and creative office space. The building will have frontage on two public streets; Sacramento Street, and Bay Street, provides different and unique pedestrian street activation of each of these public rights-of-way.

A 6-story office building would be located on the eastern half of the site while the remaining western half contains an approximately 30-foot tall existing shed that will be adaptively reused as part of the two-level retail component fronting Bay Street. An 11-story structure fronting Sacramento Street would contain the Live-Work Units. The buildings will have frontage on two public streets; Bay Street and Sacramento Street, providing different and unique pedestrian street activation of each of these public rights-of-way.

Height

The project height will be compatible with future and existing development in neighboring properties by providing building articulation and design variation, locating pedestrian paseos and commercial retail components along the ground floor frontage and proposing live-work units that enhance the surrounding industrial and artistic character, continuing a legacy of a creative and entrepreneurial residential community in the Art District. At 149 feet at its tallest, the series of three buildings with blend seamlessly with the surrounding environment, which consist of low to mid-rise buildings of varying building typologies, mirroring the project's three uniquely designed buildings that reflect an industrial character. Buildings in the vicinity include the adjacent SoHo House, a five story private club at 1000 S. Santa Fe Avenue immediately adjacent to the west of the Project, a three story industrial condominium at 1026 Santa Fe, also immediately adjacent to the Project, the five-story Ford Motor Company Warehouse at 715-829 S. Santa Fe, a retail, restaurant and creative office complex, the under construction 695 S. Sante Fe project, a seven-story mixed use live-work building, the three story Coca Cola Building at 963 E. 4th Street, a creative office and retail space, Santa Fe Lofts at 1200 S. Santa Fe Avenue and 8th Street, a conversion of a four story manufacturing warehouse to 58-unit joint live-work quarters with ground floor commercial (2007), the three-story Molino Street Lofts at 500 S. Molino Street, 95 joint living and work quarters, the six-story One Santa Fe mixed-use project which contains 439 residential units and 51,250 square feet of commercial/retail uses, the four-story 297 joint living and work quarters located at 510 S. Hewitt Street, a six-story 472 live-work condominium units with nine commercial units and 21,128 square

feet of ground floor commercial space mixed-use project located at 950 East 3rd Street, the seven-story Toy Factory Lofts at 1855 E. Industrial Street which contain 119 residential units and ground floor retail space, the seven-story Biscuit Company Lofts at 1850 E. Industrial Street which contain 104 residential units and Church & State restaurant at the ground floor, and the AMP Lofts project at 2057 E. 7th Street which is undergoing construction. More recently, media and technology firms from Warner Music to Hyperloop One have begun to establish creative offices in the area, such as at 405 Mateo, a repurposed 5-story warehouse building (the 1920's Maxwell Coffee Building) into creative office, and finally a mile north of the project site are 1003 E. 4th Place, where an eight-story building featuring 33,000 square feet of offices is now under construction and the La Kretz Innovation Campus has introduced 60,000-square-feet of creative office targeting clean technology and digital companies. Additional commercial development has also occurred nearby, including a number of restaurants, the six-story ROW DTLA at 777 S. Alameda Street, and the Urban Radish market at 661 Imperial Street. The project as proposed is consistent with both existing and proposed development in the Arts District Neighborhood, as well as additional development planned for the Downtown Area.

Bulk and Mass

With regard to bulk and mass, the building's design addresses massing in a number of ways. The proposed Project will be designed consistently with surrounding live-work projects in the area and respectful of the industrial uses and other newly proposed live-work projects in the surrounding area. The proposed 11-story building includes live-work units with ground floor commercial retail uses incorporates contemporary design elements and features which are consistent with the theme of the Arts District. The Project proposes the creation of new live-work units and productive space designed to preserve the surrounding industrial and artistic character by mixing the typical industrial spaces with new productive uses.

The design elements of the buildings and the building's façade work together to create a unified design, having a distinct rhythm of massing. There is a balance of transparency and solid walls and the length of the façade is modulated by the introduction of vertical and horizontal reveals that create distinct elements in its form. Use of architectural features such as recessed windows and open form structure provides additional visual interest, creating a distinctive and rhythmic pattern, all of which enhance the visual appeal of the proposed Project, and articulate the skyline.

The building's design utilizes complementary and contrasting materials on upper floors for live-work units that will highlight the commercial storefronts on the ground floor, which will have varying floor to ceiling heights up to 16 feet accentuating the commercial storefronts. The commercial storefronts height will continue up to the second level, designed with mostly glass oriented towards the public street and pedestrians passing by to enhance street level activity and consistent urban streetwall. The street level will also incorporate landscape/hardscape to continue to activate the street frontage. These materials and design features create visual interest both vertically and horizontally on all building facades, further serving to break up visual massing.

Visual massing is further diminished through the use of landscaped public gathering spaces, paseos, a central plaza, and multi-level terraces throughout the Subject Property. As seen on the landscape plans submitted with the instant application, the proposed project has midblock paseos that connects to a central open space amphitheater. The private terraces within the office building and restaurant terrace on the 7th floor creates further additional varied planes in the building façade and the overall design scheme. The project's two level warehouse that has been adaptively reused for restaurant and retail serves to diminish massing and is in line with the immediate area's building masses that

range from low to mid-rise buildings. The project consists of a series of buildings of varied massings in order to reduce the appearance of bulk. The inclusion of subterranean parking further reduces the massing of the project. The project has been designed to contain a balance of transparent and solid walls that are further modulated by of the use of vertical and horizontal reveals.

Setbacks

With regard to setbacks, consistent with the proposed CM zoning, the portion of the buildings fronting on Bay Street and Sacramento Street (the designated front yards) will have a 0-foot setback, while the portion along the eastern property line (designated side yard) will provide a 11-foot yard and the western property line (designated side yard) will have a 12.5-foot yard. The project is designed to create a strong street wall with continuous, uniform setbacks along Sacramento Street and Bay Street and an active ground floor, which will enhance pedestrian activity near the site and will be compatible with existing buildings built to the property line.

Parking

With regard to off-street parking facilities, required off-street parking consists of 112 automobile parking spaces for live-work residential units, 117 spaces for retail and 226 spaces for the creative office use for a total of 455 spaces. The project is proposing 479 spaces. All parking will be hidden from view in three underground levels. Vehicular access to the site would be provided by a two-way driveway located along Sacramento Street and a one-way exit driveway on Bay Street.

The loading area access will be provided to the proposed Project per the requirements of LAMC Section 12.21.C.6. With regard to lighting, per the City's plan check process, all lighting will meet Green Building Code requirements and will not impact adjacent properties. Further details will be submitted with regards to exterior light fixtures.

Landscaping

With regard to landscaping, the Project proposes over 64,000 square feet of open space. Approximately 16,135 square feet is dedicated to the JLWQ residents, while approximately 48,648 are scattered throughout the Project. The common open space will be landscaped and will provide a gathering place for recreation use by visitors to the Projects facilities as well as the Live/Work tenants. JLWQ common open space will be found on 11th level roof deck and amenity space that includes an art production space. Approximately 5,500 square feet of additional private open space will be within balconies and other private tenant locations. Public open space is available on the 2nd level Amenity deck under the reused shed, the paseos/courtyard, office adjacent terraces and the restaurant deck. The Project is required 28 trees and will provide 28 trees as proposed pursuant to the LAMC located onsite.

Off-Street Parking Facilities and Loading Areas

Required off-street parking consists of 112 automobile parking spaces for live-work residential units, 101 spaces for retail and 226 spaces for the creative office use for a total of 439 spaces. The Applicant is proposing 479 spaces. All parking will be hidden from view in three underground levels. Vehicular access to the site would be provided by a two-way driveway located along Sacramento Street and a one-way exit driveway on Bay Street. Two loading areas are planned; one located on Bay Street and one located on Sacramento Street for the commercial portions as required by the Code as the lot on which the buildings are to be located does abut an alley.

Lighting and Building Signage

Lighting and signage will be provided per LAMC requirements. The project utilizes pedestrian lighting to encourage and extend safe pedestrian activities into the evening. Lighting would be shielded downward and/or away from adjacent uses, including lighting for outdoor terraces. The use of pole-mounted lighting or floodlights is not anticipated, according to the applicant. Project lighting would also include visible interior light emanating from the ground-level commercial uses, architectural lighting to highlight architectural features of the retained portions of the existing building, and decorative lighting within the pedestrian plazas and seating areas. Additionally, the project is conditioned to require outdoor lighting to shine downward, be installed with shielding, and be directed onto the project site, so that the light source does not directly illuminate any adjacent properties or the above night skies. All parking will be underground and therefore no light will emanate from the parking areas.

Trash Collection

All trash and recycling areas are proposed to be located within an internal storage area and are not visible to the public. Trash collection will take place internally with trash collection trucks entering and exiting from Bay Street.

The surrounding area is characterized by a mix of light manufacturing, commercial, office, restaurant, and residential uses, especially as the Arts District ongoing evolution to a residential and commercial community continues. The Project would combine these uses at one site. eighborhood, as well as additional development planned for the Downtown Area. Therefore, the Project will therefore be consistent with the scale and character of the surrounding area.

The project follows good planning principles by providing building articulation and design variation, locating pedestrian paseos and commercial retail components along the ground floor frontage and proposing live-work units that enhance the surrounding industrial and artistic character, continuing a legacy of a creative and entrepreneurial residential community in the Art District.

As described above, the project consists of an arrangement of buildings and structures (including height, bulk, and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements that will be compatible with existing and future development on adjacent and neighboring properties.

c. **That any residential project provides recreational and service amenities in order to improve habitability for the residents and minimize impacts on neighboring properties.**

The proposed project will redevelop the site with 110 live-work units that will consist of studios, one-, and two-bedroom configurations in addition to providing 164,198 square feet of commercial retail and creative office space. The project is required to and will provide 11,225 square feet of usable open space in the form of private and shared balcony and terrace spaces, podium decks, a community room, a ground floor paseo, and roof deck amenities. The project includes a minimum of 13,207 square feet of landscaped area and the planting of 28 new trees at a ratio of one tree for every four residential units. Additionally, extensive landscaped areas are provided along the pedestrian paseo, including shaded walking paths, seating areas, and other publicly accessible common gathering areas such as a wooden amphitheater.

As proposed, the project will be providing ample open space, both programmed and unprogrammed, taking into consideration the varying recreational needs of the future residents. As such, the project has provided recreational and service amenities to improve the habitability for its residents and minimize impacts on neighboring properties.

FINDINGS OF FACT (CEQA)

Introduction

The City of Los Angeles (the City), as Lead Agency, has evaluated the environmental impacts of implementation of the 2110 Bay Street Mixed-Use Project, a new residential and commercial development, by preparing an environmental impact report ("EIR") (Case Number: ENV-2016-3480-EIR / State Clearinghouse No. 2017031007). The EIR was prepared in compliance with the California Environmental Quality Act of 1970, Public Resources Code Section 21000 et seq. ("CEQA") and the California Code of Regulations Title 15, Chapter 6 (the "CEQA Guidelines"). The findings discussed in this document are made relative to the conclusions of the EIR.

CEQA Section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" The procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." CEQA Section 21002 goes on to state that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles announced in CEQA Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See CEQA Section 21081(a); CEQA Guidelines Section 15091(a).) For each significant environmental impact identified in an EIR for a proposed project, the approving agency must issue a written finding, based on substantial evidence in light of the whole record, reaching one or more of the three possible findings, as follows:

1) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant impacts as identified in the EIR.

2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been, or can or should be, adopted by that other agency.

3) Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Final Environmental Impact Report for the project as fully set forth therein. Although Section 15091 of the CEQA Guidelines does not require findings to address environmental impacts that an EIR identifies as merely "potentially significant," these findings nevertheless fully account for all such effects identified in the Final EIR for the purpose of better understanding the full environmental scope of the Project. For each environmental issue analyzed in the EIR, the following information is provided:

The findings provided below include the following:

- Description of Significant Effects - A description of the environmental effects identified in the EIR.

- Project Design Features - A list of the project design features or actions that are included as part of the Project.

- Mitigation Measures - A list of the mitigation measures that are required as part of the Project to reduce identified significant impacts.

- Finding - One or more of the three possible findings set forth above for each of the significant impacts.

- Rationale for Finding - A summary of the rationale for the finding(s).

- Reference - A reference of the specific section of the EIR which includes the evidence and discussion of the identified impact.

With respect to a project for which significant impacts are not avoided or substantially lessened either through the adoption of feasible mitigation measures or feasible environmentally superior alternatives, a public agency, after adopting proper findings based on substantial evidence, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's benefits rendered acceptable its unavoidable adverse environmental effects. (CEQA Guidelines §15093, 15043(b); see also CEQA § 21081(b).)

Pursuant to CEQA Section 21081.6(a)(2) and CEQA Guidelines Section 15091(e), the documents and other materials that constitute the record of proceedings upon which the City has based its decision are located in and may be obtained from the Department of City Planning, as the custodian of such documents and other materials that constitute the record of proceedings, located at City Hall, 221 North Figueroa Street, Suite 1350, Los Angeles, CA 90012, during office hours Monday-Friday, 9:00 AM – 4:00 PM.

Environmental Documentation Background

For purposes of CEQA and these Findings, the Record of Proceedings for the Project includes (but is not limited to) the following documents:

Notice of Preparation. In compliance with CEQA Guidelines Section 15375 and Section 15082, the City published the Notice of Preparation (the "NOP"), which was sent to responsible agencies and members of the public for a 30-day review period commencing March 6, 2017[2] and ending April 5, 2017, identifying the scope of the environmental issues. The purpose of the NOP was to formally convey that the City was preparing a Draft EIR for the proposed Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. The Initial Study and NOP are provided in Appendices A-1 and A-2 to the Draft EIR.

Public Scoping Meeting. A Public Scoping Meeting was held on March 16, 2017 at 634 Mateo Street, Los Angeles, CA 90021 from 5:00 PM to 7:00 PM. The meeting was held in an open house or workshop format and provided interested individuals, groups, and public agencies the opportunity to view materials, ask questions, and provide oral and written comments to the City regarding the scope and focus of the Draft EIR. During the NOP

2 A Notice of Preparation (NOP) was sent out for the project on March 2, 2017. However, due to a mailing error, a revised NOP for the project was sent to inform the public of the NOP comment period from March 6, 2017 to April 5, 2017.

comment period or at the scoping meeting, the City received comments from five agencies (Los Angeles Department of Sanitation, California Department of Transportation, California Native American Heritage Commission, Los Angeles Fire Department, and South Coast Air Quality Management District), and no individuals. The letters and comments received during the NOP comment period are included in Appendix A-3 of the Draft EIR.

Draft EIR. The Draft EIR for the Project, which is incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and City of Los Angeles (City) CEQA Guidelines (Public Resources Code Section 21000, et seq., 14 California Code of Regulations Section 15000, et seq., City of Los Angeles Environmental Quality Act Guidelines). The Draft EIR evaluated in detail the potential environmental effects of the Project. The Draft EIR also analyzed in detail the effects of four alternatives to the Project, as described below. These included: 1) No Project; 2) All Office/Commercial; 3) Reduced Intensity; and 4) Zoning Compliant.

In accordance with the provision of Sections 15085(a) and 15087(a)(1) of the State CEQA Guidelines, the Draft EIR was distributed for public review (including the State Clearinghouse) for a 45-day review period (plus holidays), starting on November 8, 2018 and ending on December 26, 2018. A Notice of Completion and Availability was distributed to those public agencies that have jurisdiction by law with respect to the Project, or which exercise authority over resources that may be affected by the Project, and to other interested parties and agencies as required by law, which informed them of where they could view the document and how to comment. The Draft EIR was available to the public at the Department of City Planning, and the following local libraries: Los Angeles Central Library, Franklin Branch Library, Chinatown Branch Library, and Little Tokyo Branch Library, A copy of the document was also posted online at https://planning.lacity.org/.

Final EIR. A total of six comment letters were received by the close of the public comment period. The specific and general responses to comments are in Section II (Responses to Comments) of the Final EIR. The Final EIR and responses to public agency comments were distributed on April 2, 2019.

Errata. An errata, dated August 2019, was prepared to make additions to the EIR to include the description of applicable land use policies within the Land Use section of the document. This information does not represent significant new information that would affect the analysis or conclusions presented in the Final EIR.

Overview of the Project

Location

The Project Site is located in the Central City North Community Plan area of the City of Los Angeles. The Project is located at 2100 Bay Street, 2130 Bay Street, and 2141 Sacramento Street in the Arts District of the City of Los Angeles. The Project Site is located east of Santa Fe Avenue, between Bay Street to the north and Sacramento Street to the south.

The Project Site is composed of three assessor parcels. The Project Site is approximately 77,432 square feet (or 1.78 acres). The Site is zoned M3-1-RIO (Manufacturing, Height District 1, River Improvement Overlay) and has a General Plan designation of Heavy Manufacturing. The Site is subject to Zoning Information (ZI) ZI-2129 East Los Angeles State Enterprise Zone, ZI-2358 River Improvement Overlay District, ZI-2452 Transit Priority Area in the City of Los Angeles, ZI-2427 Freeway Adjacent Advisory Notice for Sensitive Uses, and ZI-2317 Central Industrial Redevelopment Project.

The Site is in southeast Downtown Los Angeles, approximately 550 feet west of the Los Angeles River and 15 miles east of the Pacific Ocean. The Site is located within the Central City North Community Plan (Community Plan). The Community Plan contains 2,005 acres, which is approximately less than one percent of the land in the City of Los Angeles. The plan area is adjacent to downtown Los Angeles (Downtown) and bounded by the Los Angeles River to the east, the City of Vernon to the south, Alameda Street, Cesar Chavez Avenue, Sunset Boulevard, and Marview Avenue to the west, and Stadium Way, Lilac Terrace, and North Broadway to the north. The plan area is surrounded by the Community Plan areas of Silverlake-Echo Park, Central City, Boyle Heights, and Northeast Los Angeles.

Central City North consists of a combination of grid and curvilinear streets and includes both the industrial district east of Alameda Street from the Santa Ana Freeway south to the City of Vernon and the largely commercial and residential Chinatown district north of the Hollywood Freeway. It is located west of the Pasadena Freeway and just southeast of the Hollywood-Pasadena Freeway interchange. The Chinatown commercial district consists of a mix of low rise buildings with pedestrian oriented storefronts along segments of Hill Street and Broadway. Industrial development north of the 101 Freeway surrounds the Chinatown commercial district. The entire area south of the 101 Freeway between Alameda Street and the Los Angeles River (and railroad lines) is a major industrial district, consisting of a variety of different industrial activities.

Additionally, the Department of City Planning is currently updating the Central City Community Plan in conjunction with the Central City North Community Plan, whose areas together make up Downtown Los Angeles (also known as DTLA), in a combined planning document referred to as the DTLA 2040 Plan. The purpose of the DTLA 2040 Plan is to develop and implement a future vision for Downtown Los Angeles that supports and sustains ongoing revitalization while thoughtfully accommodating projected future growth. As the downtown area has been a rapidly changing setting within Los Angeles, it supports a collection of economic opportunities and entrepreneurship, people, culture, and distinct neighborhoods, and sits at the center of the regional transportation network.

Existing Conditions

The Project Site is currently developed with an existing surface parking lot, an open-air industrial shed to be incorporated into the new development (Shed Building), and an approximately 4,000 square feet manufacturing building to be demolished. The existing buildings are vacant.

Development

The Project proposes a new residential and commercial development including 110 live/work apartment units (67 studio units, 34 1-bedroom units, and 9 2-bedroom units), 113,350 square feet of creative office space, and 50,848 square feet of new commercial space that may include commercial retail, and/or restaurant floor area. The Project would include three buildings:

- Live/Work Building with ground floor retail oriented on the southwest corner of the Site,
- Retail Building with amenities oriented on the northwest corner of the Site, and
- Office Building with ground floor retail oriented on the east side of the Site) with connections via pedestrian walkways, ground floor plazas and elevated terraces.

Each of the buildings is designed with ground floor commercial (retail) fronting not only on Bay and Sacramento streets, but also along the Project's internal central courtyard. The central

courtyard is planned with pedestrian connections to the surrounding streets. Within the site's northwestern corner, the Project would adaptively reuse an existing approximately 30-foot tall shed structure (Shed Building) by creating an approximately 17-foot-tall single-story structure with a roof top open space element under the reconstructed shed. This building's first floor is planned for retail uses while its roof top open space element, below the roof of the shed structure, could be used for resident, employee, patron or community activities. The Project's eastern half of the site from Sacramento to Bay streets would be developed with a seven-story building containing approximately 113,350 square feet of creative offices space and a small restaurant space on the top floor (Retail Building). This building is designed with numerous exterior terrace elements available to future tenants providing outdoor working areas or passive recreation areas all with views of downtown or the Los Angeles River. The 11-story Live/Work Building fills the southwestern portion of the site and contains 110 live/work units, their amenity spaces and 2nd level publicly accessible gym (primarily accessed from a bridge extending from the adjacent Retail Building to its north. It would also have elevator access from the Live/Work Building). The average unit size is 947 square feet. The Project would provide 11% of its total units, or 12 units, as Very Low-Income Restricted Affordable units. Resident amenities include a large roof top deck with pool, a club-house, a shared art space and private balconies and decks.

Requested Entitlements

The City of Los Angeles is the Lead Agency for the Project. In order to construct the Project, the Project Applicant is requesting approval of the following actions:

1. Pursuant to **Los Angeles Municipal Code (LAMC) Section 11.5.6,** as authorized by the Los Angeles Charter Section 555, the Applicant requests approval of General Plan Amendments to permit the construction of a new mixed use project containing a maximum of 110 Live/Work Units, 11% of the total units would be set aside as Restricted Affordable units at a Very Low Income level, approximately 50,848 square feet of commercial (retail) space and 113,350 square feet of creative office space. The Amendments include:

   a. To revise the land use designation in the Central City North Community Plan from Heavy Industrial to Commercial Industrial.

   b. The deletion of Community Plan Footnotes 1 (Height District No. 1) and 6 (for properties designated on zoning maps as Height District Nos. 1, 1L, 1VL, or 1XL (or their equivalent), development exceeding a floor area ratio of 1:5:1 up to 3:1 may be permitted through a zone change height district change procedure, including an environmental clearance) from the Industrial land use category to accommodate a "2" Height District in the CM zone.

2. Pursuant to **LAMC Section 12.32 F and Q,** the Applicant requests approval of a Vesting Zone and Height District change from M3-1-RIO (Heavy Industrial Zone) to CM-2-RIO (Commercial Manufacturing Zone in Height District 2) to permit the construction of a new mixed use project containing a maximum of 110 Live/Work Units, 11% of the total units would be set aside as Restricted Affordable units at a Very Low Income level, approximately 50,848 square feet of commercial (retail) space and 113,350 square feet of creative office space.

3. Pursuant to **LAMC Section 16.05,** the Applicant requests the approval of Site Plan Review findings.

4. Pursuant to **California Government Code Sections 66473.1 and 66474 (Subdivision Map Act) and LAMC, Section 17.00 of Article 7 (Division of Land),** the Applicant

requests approval of a Vesting Tentative Tract Map to merge all lots into one development site.

a. Pursuant to LAMC Section 17.03 A, the request also includes an adjustment of less than 20% in the CM lot area requirements (1 per 800 square feet of lot area) to permit a density equal to one unit per 712 square feet of lot area (11%).

5. Pursuant to various sections of the LAMC, the Applicant would request approvals and permits from the Building and Safety Department (and other municipal agencies) for project construction actions including, but not limited to the following: demolition, excavation, shoring, grading, foundation, building, and tenant improvements.

6. Pursuant to California Environmental Quality Act, the Applicant requests certification of the Project's Environmental Impact Report.

No Impact Or Less Than Significant Impacts Without Mitigation

Impacts of the Project that were determined to have no impact or be less than significant in the Draft EIR (including having a less than significant impact as a result of implementation of project design features and regulatory compliance measures) and that require no mitigation are identified below. These include potential impacts that were analyzed in the Initial Study and that were further analyzed in the Draft EIR. However, based on the analysis in the Initial Study, the Draft EIR does not address the following environmental impacts that were found to be not potentially significant in the Initial Study: impacts related to aesthetics, agriculture and forestry resources, biological resources, and mineral resources. Refer to the Initial Study at Appendix A-1 of the Draft EIR. The City has reviewed the record and agrees with the conclusion that the following environmental factors, as well as the environmental factors analyzed exclusively in the Initial Study, would not be significantly affected by the Project and therefore, no additional findings are needed.

These findings do not repeat the full discussions of environmental impacts contained in the EIR. The City ratifies, adopts, and incorporates the analysis, explanation, findings, responses to comments, and conclusions of the EIR. The City adopts the reasoning of the EIR, City staff reports, and presentations regarding the Project.

The California Natural Resources Agency adopted revisions to the CEQA Guidelines that became effective on December 28, 2018. The revisions to the Guidelines included revisions to the Guidelines' Appendix G – Environmental Checklist Form. The revisions to the CEQA Guidelines were adopted largely to create efficiencies and to align the Guidelines with California appellate court and Supreme Court decisions. The revised Guidelines, including the revised Appendix G Environmental Checklist, apply prospectively and only to steps in the CEQA process not yet undertaken by the effective date of the revisions. (CEQA Guidelines Section 15007(b).) The revised Guidelines do not apply to CEQA documents that were published for public review before the effective date of the revised Guidelines. (CEQA Guidelines Section 15007(c).) The Draft EIR was published for public comment on November 8, 2018. Therefore, the revisions to the Guidelines and to Appendix G do not apply to City's analysis in the Initial Study and Draft EIR.

Air Quality

1 Conflict with or Obstruct Implementation of an Applicable Air Quality Plan

1 AQMP

The proposed land uses would neither conflict with the 2016 Air Quality Management Plan ("AQMP") of the South Coast Air Quality Management District ("SCQAMD") nor jeopardize the region's attainment of air quality standards. The Project would not exceed the SCAQMD's screening thresholds for criteria pollutants (NO_2 as NO_x, CO, PM_{10}, and $PM_{2.5}$), which are an indicator of potential exceedances of ambient air quality standards. Since VOCs are not a criteria pollutant, there is no ambient air quality standard or localized threshold for them. Because particulate matter is the primary pollutant of concern during the construction phase, the analysis evaluated PM_{10} and $PM_{2.5}$ emissions to assess potential effects on localized concentrations and determine if there is potential to cause an exceedance of ambient air quality standards. As shown in Table IV.A-6 of the Draft EIR, increases in PM_{10} and $PM_{2.5}$ emissions would not exceed the SCAQMD's significance thresholds at sensitive receptors near the Project Site. Similarly, construction emissions of NO_x and CO would not exceed the SCAQMD's significance thresholds and would not impact the region's ability to meet ambient air quality standards. As a result, construction activities would not exceed the regional or localized significance thresholds for any criteria pollutants, and no mitigation measures are required. As such, the Project's localized construction emissions impact would be less than significant.

Similarly, Project operations would not produce regional or localized emissions that exceed the SCAQMD's screening thresholds for criteria pollutants, largely because of the absence of major on-site stationary sources. As for off-site impacts, Project-related traffic would not result in CO hotspots where ambient air quality standards could be exceeded near roadways affected by Project traffic. Thus, the Project would not increase the frequency or severity of any existing violation or cause or contribute to new violations for criteria pollutants. As such, the Project meets this AQMP consistency criterion. As shown in Table IV.A-7 of the Draft EIR, operational impacts would be less than significant. Thus, the Project would not increase the frequency or severity of any existing violation or cause or contribute to new violations for criteria pollutants. As the Project would not exceed any State and federal standards, the Project would not delay attainment of air quality standards or interim emission reductions specified in the AQMP.

Furthermore, the Project is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. As the Project would support the City of Los Angeles and SCAQMD's objectives of reducing vehicle miles traveled ("VMT") and the related vehicular air emissions, the Project would be consistent with AQMP land use policies. The Project would not result in any significant air quality impacts and therefore would not require mitigation. In addition, the Project would comply with all applicable regulatory standards as required by SCAQMD (such as Rule 403). As such, the Project would not exceed the assumptions utilized in preparing the AQMP. The Project would not conflict with or obstruct implementation of the AQMP, and impacts would be less than significant.

2 General Plan Air Quality Element

The Project would support the goals, objectives, and policies of the Air Quality Element of the City General Plan. Specifically, the Project includes short- and long-term bicycle parking spaces for residents and visitors. In addition, the Project is located in an area well-served by public transit provided by Los Angeles County Metropolitan Authority ("Metro) and is within a High Quality Corridor. As such, the Project would provide opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in VMT.

Additionally, the Project would include commercial uses that would serve Project residents and employees and the Project vicinity, thereby reducing VMT that would otherwise be required to travel to similar commercial uses elsewhere in the community. Further, the Project would be consistent with the existing land use pattern in the vicinity that concentrates urban density along major arterials and near transit options. The Project would also include an entrance for pedestrians and bicyclists that would be safe and easily accessible. As such, the Project would serve to implement applicable policies of the City of Los Angeles pertaining to air quality, and its impacts would be less than significant.

2 Air Quality Standards

1 Regional Construction Impacts

Construction-related emissions were estimated using the SCAQMD's CalEEMod 2016.3.2 model using assumptions from the Project's developer, including the Project's construction schedule of approximately 36 months. Table IV.A-5 of the Draft EIR summarizes the proposed construction schedule that was modeled for air quality impacts. Construction of the Project would generate pollutant emissions through the use of heavy-duty construction equipment on- and off-site, heavy-duty trucks hauling material to and from the Project Site, as well as vehicle trips generated by construction workers traveling to and from the site. Construction emissions can vary substantially from day to day, depending on the level of activity, the type of operation, and technology employed in the equipment used. As shown in Table IV.A-6 of the Draft EIR, estimated daily Project construction emissions would not exceed the SCAQMD's regional thresholds. As a result, construction of the Project would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). Therefore, construction impacts on regional air quality would be less than significant.

2 Localized Construction Impacts

Maximum on-site daily construction emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for the Central LA SRA based on construction site acreage that is less than or equal to 5 acres. Potential impacts were evaluated at the closest off-site sensitive receptor, which is the multi-family residences (Art House Lofts), located at 1200 South Santa Fe Street, about 400 feet south of the Project Site. The closest receptor distance on the SCAQMD mass rate LST look-up tables is 100 meters. As shown in Table IV.A-6 of the Draft EIR, the Project would produce emissions that do not exceed the SCAQMD's recommended LSTs for NO_2 and CO during the construction phase. Similarly, construction activities would not produce PM_{10} and $PM_{2.5}$ emissions that exceed LSTs recommended by the SCAQMD. These estimates assume the use of Best Available Control Measures ("BACM") that address fugitive dust emissions of PM_{10} and $PM_{2.5}$ through SCAQMD Rule 403. This would include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. Therefore, construction impacts on localized air quality would be less than significant.

3 Regional Operational Impacts

Operational emissions of criteria pollutants would come from area sources and mobile sources. Area sources include natural gas for space heating and water heating, gasoline-powered landscaping and maintenance equipment, consumer products such as household cleaners, and architectural coatings for routine maintenance. The Project would also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project site. The Project is anticipated to generate up to 2,394 daily vehicle trips. The CalEEMod program generates estimates of emissions from energy use based on the land use type and size. As shown in Table IV.A-7 of the Draft EIR, would not exceed the SCAQMD's regional or localized

significance thresholds. Therefore, the Project's operational impacts on regional air quality would be less than significant.

4 Localized Operational Impacts

With regard to localized air quality impacts, the Project would emit minimal quantities of NO_2, CO, PM_{10}, and $PM_{2.5}$ from area and energy sources on-site. As shown in Table IV.A-7 of the Draft EIR, these localized emissions would not approach the SCAQMD's LSTs that signal when there could be human health impacts at nearby sensitive receptors during long-term operations. Therefore, the Project's operational impacts on localized air quality would be less than significant.

3 Cumulatively Considerable Net Increase of Any Criteria Pollutant Subject to Non-Attainment

1 Construction Impacts

For regional ozone precursors, the Project would not exceed SCAQMD mass emission thresholds for ozone precursors during construction. Similarly, regional emissions of PM_{10} and $PM_{2.5}$ would not exceed mass thresholds established by the SCAQMD. Construction of the Project would not contribute significantly to cumulative emissions of any non-attainment regional pollutants. Therefore, construction emissions impact on regional criteria pollutant emissions would be less than significant.

When considering local impacts, cumulative construction emissions are considered when projects are within close proximity of each other that could result in larger impacts on local sensitive receptors. Construction of the Project itself would not produce cumulatively considerable emissions of localized nonattainment pollutants PM_{10} and $PM_{2.5}$, as the anticipated emissions would not exceed LST screening thresholds set by the SCAQMD. Therefore, construction emissions impact on localized criteria pollutant emissions would be less than significant.

There are 60 related projects in the general vicinity of the Project Site that were identified by the Project's traffic study. In addition, the Central City North Community Plan Update, known as the DTLA 2040 Plan, is currently being prepared by DCP. According to the DTLA 2040 Plan projections, approximately 125,000 people, 70,000 housing units, and 55,000 jobs would be added to the Downtown area by the year 2040. Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is anticipated to be completed by 2022, well before the Community Plan Update's horizon year. As such, it can be assumed that the projected growth reflected by the list of related projects located within the Central City North Community Plan area, which itself is a conservative assumption as discussed above, would account for any overlapping growth that may be assumed by the Community Plan Update upon its adoption.

If any of these related projects were to undertake construction concurrently with the Project, localized CO, $PM_{2.5}$, PM_{10}, and NO_2 concentrations would be further increased. However, the application of LST thresholds to each related project in the local area would help ensure that each related project does not produce localized hotspots of CO, $PM_{2.5}$, PM_{10}, and NO_2. Any related projects that would exceed LST thresholds (after mitigation) would perform dispersion modeling to confirm whether health-based air quality standards may be violated and mitigation imposed as needed. The SCAQMD's LST thresholds recognize the influence of a receptor's proximity, setting mass emissions thresholds for PM_{10} and $PM_{2.5}$ that generally double with every doubling of distance. However, the City's required compliance with SCAQMD Rule 403 would result in the implementation of measures that substantially reduce PM_{10} and $PM_{2.5}$

emissions during on-site construction activities. Cumulative projects in the surrounding area would also be required to comply with the applicable portions of SCAQMD Rule 403, and each project would also be required to implement appropriate additional mitigation commensurate with its estimated construction emission quantities. Therefore, construction of the Project would not produce a cumulatively considerable contribution to cumulative pollutant concentrations at nearby sensitive receptors, and impacts would be less than significant.

2 Operational Impacts

The Project would not produce cumulatively considerable emissions of nonattainment pollutants at the regional or local level. The Project would not include major sources of combustion or fugitive dust. As a result, its localized emissions of PM_{10} and $PM_{2.5}$ would be minimal. Likewise, existing land uses in the area include land uses that do not produce substantial emissions of localized nonattainment pollutants. As shown in Table IV.A-7 of the Draft EIR, Project operation daily emissions would not exceed any of the SCAQMD's regional or localized thresholds. Therefore, the Project's contribution to cumulative operation-related regional or localized emissions would not be cumulatively considerable and, thus, would be less than significant. The Project would not result in a cumulatively considerable increase of any criteria pollutant under an applicable federal or State ambient air quality standards.

4 Sensitive Receptors

1 Construction Impacts

Construction of the Project could expose sensitive receptors to substantial pollutant concentrations if maximum daily emissions of regulated pollutants generated by sources located on and/or near the Project Site exceeded the applicable LST values presented in Table IV.A-3 of the Draft EIR. As illustrated in Table IV.A-6 of the Draft EIR, these nearby receptors would not be exposed to substantial concentrations of localized pollutants PM_{10} and $PM_{2.5}$ from construction of the Project. Specifically, construction activities would not exceed SCAQMD LST screening thresholds, and impacts would be less than significant.

The Project would not result in any substantial emissions of toxic air contaminants ("TACs") during the construction phase. During construction, the primary TAC emissions would be associated with the combustion of diesel fuels, which produce exhaust-related particulate matter that is considered a TAC by CARB based on chronic exposure to these emissions. However, construction activities would not result in chronic, long-term exposure to diesel particulate matter ("DPM"), and impacts associated with TACs would be less than significant. The primary TAC that would be generated by construction activities is DPM, which would be released from the exhaust stacks of construction equipment. The construction emissions modeling conservatively assumed that all equipment present on the Project Site would be operating simultaneously and continuously throughout most of the day, while, in all likelihood, this would rarely be the case. Average daily emissions of DPM would be less than one pound per day throughout the course of Project construction. Therefore, the magnitude of daily DPM emissions would not be sufficient to result in substantial pollutant concentrations at off-site residential locations nearby.

Furthermore, according to SCAQMD methodology, health risks from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 30-year lifetime would contract cancer based on the use of standard risk-assessment methodology. The entire duration of construction activities associated with implementation of the Project is anticipated to be approximately 36 months, and the magnitude of daily DPM emissions would vary over this time period. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period, construction TAC emissions would result

in a less-than significant impact. Therefore, construction of the Project would not expose sensitive receptors to substantial DPM concentrations, and this impact would be less than significant.

2 Operational Impacts

The Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO_2, $PM_{2.5}$, or PM_{10} at nearby sensitive receptors. While long-term operations of the Project would generate traffic that produces off-site emissions, these would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot. Specifically, traffic levels of service at the intersections studied in the vicinity of the Project would not be significantly impacted by traffic volumes from the development under existing or 2022 horizon scenarios. At buildout of the Project, the highest average daily trips at an intersection would be less than 100,000 vehicles at the Santa Fe and 7th Street intersection, which is significantly below the daily traffic volumes that would be expected to generate CO exceedances, In addition, 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. The Project would not generate a substantial number of truck trips. Based on the limited activity of TAC sources, the Project would not warrant the need for a HRA associated with on-site activities. Therefore, Project impacts would be less than significant. Therefore, the Project would not expose sensitive receptors to substantial air pollutant concentrations, and Project impacts would be less than significant.

5 Odors

As discussed in Section V of the Draft EIR, Other CEQA Considerations, and in the Initial Study (Appendix A-1), the Project Site would not create objectionable odor impacts. The Project does not include any of the uses identified by the SCAQMD as being associated with odors. While the Project does include restaurant uses, compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the project's long-term operations phase to a less-than-significant level. Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents as well as asphalt paving. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Via mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed which would create a significant level of objectionable odors and would limit potential objectionable odor impacts during the Project's short-term construction phase to a less-than-significant level. Thus, the Project would have a less than significant impact with respect to odors.

6 Cumulative Emissions

1 Construction Impacts

Similar to the Project, the greatest potential for TAC emissions with respect to each related project would generally involve DPM emissions associated with heavy equipment operations during demolition and grading/excavation activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk.

"Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Construction activities with respect to each related project would not result in a long-term (i.e., 70-year) substantial source of TAC emissions. In addition, the SCAQMD's CEQA Air Quality Handbook and SCAQMD's supplemental online guidance/information do not require a health risk assessment for short-term construction emissions. It is, therefore, not required or meaningful to evaluate long-term cancer impacts from construction activities which occur over relatively short durations. As such, cumulative toxic emission impacts during construction would be less than significant. During construction, the Project would not result in a cumulative impact to air quality as the Project's contributions to regional, localized, and TAC emissions would not be cumulatively considerable.

2 Operation Emissions

The Project would not produce cumulatively considerable emissions of nonattainment pollutants at either the regional or local level (see Table IV.A-7 the Draft EIR). Because the Project's pollutant emissions would not exceed the SCAQMD's operational thresholds of significance, the Project's contribution to cumulative emissions of non-attainment pollutants would be considered less than significant. Therefore, the emissions of non-attainment pollutants and precursors generated by Project operation would not be cumulatively considerable.

With respect to TAC emissions, neither the Project nor any of the related projects (which primarily include residential, retail/commercial, office, uses) would represent a substantial source of TAC emissions, which are more typically associated with large-scale industrial, manufacturing, and transportation hub facilities. The Project and related projects would be consistent with the recommended screening level siting distances for TAC sources, as set forth in CARB's Land Use Guidelines, and the Project and related projects would not result in a cumulative impact requiring further evaluation. However, the Project and each of the related projects would likely generate minimal TAC emissions related to the use of consumer products and landscape maintenance activities, among other things. Pursuant to California Assembly Bill 1807, which directs CARB to identify substances as TACs and adopt ATCMs to control such substances, the SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Air Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. In addition, the Project would not result in any substantial sources of TACs that have been identified in CARB's Land Use Guidelines and, thus, would not result in a cumulatively considerable impact or a cumulatively significant impact. During operation, the Project would not result in a cumulative impact to air quality as the Project's contributions to regional, localized, and TAC emissions would not be cumulatively considerable.

Cultural Resources

7 Historic Resources

The Site and buildings not listed in the National Register and do not appear to meet National Register eligibility requirements. The Site and buildings are not listed in the California Register and do not appear to meet California Register eligibility requirements. The Site and buildings are not individually listed as a City of Los Angeles Historic Cultural Monument (LAHCM), and do not appear to meet local eligibility requirements. This area of the Arts District is not a designated Historic Preservation Overlay Zone (HPOZ) and does not appear to meet HPOZ criteria. As the Project Site and buildings do not appear eligible for listing in the National or California Registers nor are they listed as LAHCM, they are not historical resources for purposes of CEQA. The Project would have no impact on historic resources.

8 Archaeological and Paleontological Resources

Archaeological and Paleontological Resources are discussed under Section 5. Less Than Significant Impacts With Mitigation, below.

9 Human Remains

The Project Site is located in a heavily urbanized area contains existing buildings and surface parking, and has been previously disturbed by past development activities. The likelihood of encountering human remains on the Project Site is minimal. However, during the construction and excavation of the Project Site, there is a possibility that human remains could be encountered. If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the County Coroner shall be called immediately. If the remains are determined to be of Native American descent, the County Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC would immediately notify the person it believes to be the most likely descendent of the deceased Native American. 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. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC. Therefore, impacts will be less than significant.

10 Cumulative

While the majority of the related projects are located a substantial distance from the Project Site, as shown in Figure III-1 in Section III, Environmental Setting, of the Draft EIR, several related projects are located in proximity to the Project Site. Although impacts to historic resources tend to be site-specific, cumulative impacts would occur if the Project, related projects, and other future development area affected local resources with the same level or type of designation or evaluation, affected other structures located within the same historic district, or involved resources that are significant within the same context as the Project.

All Project development would remain on-site and, no historic resources exist on the Project Site. Therefore, Project impacts to historic resources within the vicinity of the Project would not be cumulatively considerable, and cumulative impacts would be less than significant.

a) Geology and Soils

(1) Potential Substantial Adverse Effects

The Project Site would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known fault, strong seismic ground shaking, seismic-related ground failure (e.g., liquefaction), or landslide, caused in whole or in part by the Project's exacerbation of the existing environmental conditions. The Project Site is not located in an Alquist-Priolo Fault Zone or a City-designated Fault Rupture Study Area.

The main seismic hazard affecting the Site is moderate to strong ground shaking. The Project would be designed and constructed in accordance with the City Building Code and California Building Code, which specify structural requirements for different types of buildings in a seismically active area. Additionally, the Project would adhere to the City's Department of Building and Safety ("LADBS") recommendations. Adherence to current building codes and

engineering practices would ensure that the Project would not expose people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region.

The Project Site is not identified by ZIMAS as being within a liquefaction zone. The City of Los Angeles Seismic Safety Element does not identify the Project Site as being within a liquefiable area. The Project would be required to comply with building regulations set forth by the State Geologist, which require site analysis prior to development. Furthermore, the Project would comply with the CGS Special Publications 117, *Guidelines for Evaluating and Mitigating Seismic Hazards in California* (1997), which provides guidance for evaluation and mitigation of earthquake-related hazards including liquefaction. The Project Site is not classified as a landslide hazard zone in the CGS Seismic Hazards Map, nor is it identified by ZIMAS as being within a landslide hazard zone, and development would not substantially alter the existing topography of the Project Site. Thus, the Project would have a less-than-significant impact with respect to potential rupture of a known fault, strong seismic ground shaking, seismic-related ground failure (e.g., liquefaction), or landslide.

(2) Soil Erosion or Loss of Topsoil

The Project Site would not result in substantial soil erosion or loss of topsoil. The potential for soil erosion during Project operation would be relatively low due to the urbanized nature of the Project Site and the generally level topography of the Site. In addition, the Project Site will be improved with a new buildings, hardscape and landscape. Thus, the Project would have a less-than-significant impact with respect to soil erosion or loss of topsoil.

(3) Landslides, Lateral Spreading, Subsidence, Liquefaction, Collapse

A significant impact may occur if the Project is built in an unstable area without proper site preparation or design features to provide adequate foundations for the project buildings, thus posing a hazard to life and property. Construction activities associated with the Project must comply with the Los Angeles Building Code ("LABC"), which is designed to assure safe construction, including building foundation requirements appropriate to site conditions. In addition, the Project Site is not at risk for landslides as the Project Site is relatively level with very little elevation change. Some seismically-induced settlement of the Project Site would be expected as a result of strong ground shaking. However, due to the uniform nature of the underlying geologic materials, excessive differential settlements are not expected to occur. The Project would be required to conform to the Uniform Building Code seismic standards as approved by LADBS to ensure that seismically-induced settlement does not cause the Project Site to be unstable as a result of the Project's exacerbation of existing environmental conditions. As such, based on these considerations, the Project would not cause the Project Site to become unstable, resulting in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse caused, in whole or in part, by the Project's exacerbation of existing environmental conditions. Therefore, Project impacts with respect to soil stability would be less than significant.

(4) Expansive Soil

On-site soils have very low expansion range Design and construction of the Project would be required to comply with the 2016 California Building Code and supplemental requirements of the LAMC, as enforced by the City of Los Angeles. These requirements include building foundation and other requirements appropriate to site-specific conditions that would be provided in accordance with the design level geotechnical investigation required by the City. Therefore, the Project would not be located on expansive soil to create a substantial risk to life or property cause in whole or in part by the Project's exacerbating the expansive soil conditions. As such, Project impacts with respect to expansive soils would be less than significant.

(5) Septic Tanks

As discussed in Section V of the Draft EIR, Other CEQA Considerations, and in the Initial Study (Appendix A-1), the Project Site would not use a septic tank or alternative waste disposal system. The Project Site is located in a developed area, which is served by a wastewater collection, conveyance and treatment system operated by the City. Thus, the Project would have no impact with respect to septic tanks or alternative waste disposal systems.

(6) Cumulative

Due to the site-specific nature of geological conditions (i.e., soils, geological features, subsurface features, seismic features, etc.), geology impacts are typically assessed on a project-by-project basis, rather than on a cumulative basis. Nonetheless, cumulative growth through 2022 (buildout year) (inclusive of the 60 related projects identified in Section III of the Draft EIR, Environmental Setting) would expose a greater number of people to seismic hazards. However, as with the Project, all related projects and other future development projects would be subject to established guidelines and regulations pertaining to building design and seismic safety, including those set forth in the CBC and LABC. Therefore, with adherence to applicable regulations, Project impacts with regard to the exacerbation of geological and soils conditions would not be cumulatively considerable, and cumulative impacts with regard to geology and soils would be less than significant.

b) Greenhouse Gas Emissions (GHG)

(1) GHG Emissions Generation

Compliance with a GHG emissions reduction plan renders a Project less than significant. In support of the consistency analysis which describes the Project's compliance with or exceedance of performance-based standards included in the regulations and policies outlined in the applicable portions of the Climate Change Scoping Plan, the 2016– 2040 RTP/SCS, the LA Green Plan, and the Sustainable City pLAn, quantitative calculations are provided below. The Project would result in direct and indirect GHG emissions generated by different types of emissions sources, including: construction, area sources, mobile sources, energy sources, solid waste, and water/wastewater. The Project would generate an incremental contribution to and a cumulative increase in GHG emissions.

As shown in Table IV.D-10 of the Draft EIR, the GHG emissions for the Project would total 6,326 $MTCO_{2e}$ per year. The Project's profile as an urban infill, mixed-use project with proximity to substantial public transit would produce substantial reductions over land uses that are located in a more typical community that has not coordinated its land use and transportation planning. GHG emissions from mobile sources reflects a 30 percent reduction in mobile source emissions with implementation of VMT reducing measures as compared to the Project without implementation of VMT reducing measures. This reduction is attributable to the Project characteristics as being an infill project near transit that supports multi-modal transportation options. These would result in concomitant reductions in CO2e emissions that far exceed the State's AB 32 Scoping Plan goal of a 4.5 percent reduction from the overall transportation sector by 2020. As such, the Project would meet and exceed its contribution to statewide climate change obligations that are under the control of local governments in their decision-making.

The Draft EIR's analysis included potential emissions from the Project at build-out based on actions and mandates expected to be in force in 2020. Early-action measures identified in CARB's Climate Change Scoping Plan that have not yet been approved were not credited in

that analysis. By not speculating on potential regulatory conditions, the analysis took a conservative approach that likely overestimated the Project's GHG emissions at build-out.

(2) Plan Consistency

The Project comply with or exceeds the plans, policies, regulations and GHG reduction actions/strategies outlined in the Climate Change Scoping Plan and First Update (as shown in Table IV.D-5 of the Draft EIR), the 2017 Scoping Plan Update (as shown in Table IV.D-6 of the Draft EIR), the 2016–2040 RTP/SCS (as shown in Table IV.D-7 of the Draft EIR), the LA Green Plan (as shown in Table IV.D-8 of the Draft EIR), and the Sustainable City pLAn (as shown in the discussion on pages IV.D-65 to IV.D-66 of the Draft EIR. In addition, consistency with the above plans, policies, regulations and GHG reduction actions/strategies would serve to reduce GHG emissions for the Project. Therefore, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs. Furthermore, because the Project is consistent and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, Project-specific impacts with regard to climate change would be less than significant.

(3) Cumulative

The consistency plans discussed above account for cumulative impacts. As explained above, the analysis of a project's GHG emissions is inherently a cumulative impacts analysis because climate change is a global problem and the emissions from any single project alone would be negligible. Accordingly, the analysis above took into account the potential for the Project to contribute to the cumulative impact of global climate change. Tables IV.D-10 of the Draft EIR illustrate that implementation of the Project's regulatory requirements and project design features, including state mandates, would contribute to GHG reductions. These reductions support State goals for GHG emissions reduction. The analysis shows that the Project is consistent with CARB's Climate Change Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy.

The analysis also shows that the Project is consistent with the 2016–2040 RTP/SCS' plans, policies, and regulatory requirements to reduce regional GHG emissions from the land use and transportation sectors by 2020 and 2035. In addition, the Project would comply with the LA Green Plan, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. Furthermore, the Project would comply with the aspirations of the Sustainable City pLAn, which includes specific targets related to housing and development, and mobility and transit. Given the Project's consistency with statewide, regional, and local plans adopted for the reduction of GHG emissions, it is concluded that the Project's incremental contribution to greenhouse gas emissions and their effects on climate change would not be cumulatively considerable. For these reasons, the Project's cumulative contribution to global climate change would be less than significant.

(4) Project Design Features

The following project design features (PDFs) are applicable to the Project with regard to GHG emissions:

GHG-PDF-1 At least 20 percent of the total code-required parking spaces provided for all types of parking facilities shall be capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s)

of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20-percent requirement results in a fractional space, round up to the next whole number. A label stating "EV CAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

At least 5 percent of the total code-required parking spaces shall be equipped with EV charging stations. Plans shall indicate the proposed type and location(s) of charging stations. Plan design shall be based on Level 2 or greater EVSE at its maximum operating capacity. When the application of the 5-percent requirement results in a fractional space, round up to the next whole number.

GHG-PDF-2 The Project will utilize electric or solar-powered generators during construction, as feasible.

c) Hazards and Hazardous Materials

(1) Transport, Use, or Disposal

Construction of the Project would involve the temporary transport, use, and/or disposal of potentially hazardous materials, including paints, adhesives, surface coatings, cleaning agents, fuels, and oils. The use of these materials would be temporary and short-term in nature. Additionally, all potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations.

The Project includes the development of a residential, office, and commercial uses. These types of urban uses typically involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, paints, and pesticides for landscaping, hydraulic fluids for the elevators, refrigerant for the HVAC system, and petroleum products. With implementation of hazardous waste reduction efforts on-site (i.e., the City's Green Building Ordinance and through source reduction, recycling, on-site treatment, etc.), as well as the proper treatment and disposal of such wastes at licensed resource recovery facilities, the Project would not generate significant amounts of hazardous wastes. The transport of hazardous materials and wastes (i.e., paints, adhesives, surface coatings, cleaning agents, fuels, and oils) would occur in accordance with federal and state regulations, including Resource Conservation and Recovery Act ("RCRA"), Title 49 of the Code of Federal Regulations ("CFR"), the California Vehicle Code, and the California Health & Safety Code. In accordance with such regulations, the transport of hazardous materials and wastes would only occur with transporters who have received training and appropriate licensing. Additionally, hazardous waste transporters would be required to complete and carry with him/her a hazardous waste manifest. Placarding of vehicles carrying hazardous materials would also occur in accordance with Title 49 of the CFR. Compliance with applicable City, state, and federal regulations related to the handling, storage, transport, and disposal of hazardous materials and waste during operation of the Project would ensure that no significant hazard to the public or the environment occurs. Therefore, impacts related to the use of hazardous materials during operation would be less than significant.

(2) Upset or Accident Conditions

The Project would be removing an industrial building and adaptively reusing a shed structure. While most of the accessed site building's interior areas (shed) are not improved, based on the apparent age of structures at the site, Asbestos-Containing Materials (ACMs) may still be present. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations. There is potential for lead-based paint. Should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations. Impacts would be less than significant.

(3) Existing or Proposed Schools

The Project Site is not located within one-quarter mile of a school. The nearest school is Metropolitan High School, located at 727 Wilson Street, approximately 1,550 feet to the northwest.

During construction, the Site would be surrounded by a temporary construction fence to minimize dust and prevent trespass. All potentially hazardous materials would be used, stored, and disposed of according to manufacturers' specifications and in compliance with applicable federal, state, and local regulations. Thus, the use of such materials would not create a hazard to a nearby school. In addition, the Project will have a less than significant impact during construction for potential asbestos, lead-based paint. Regulations would ensure that demolition of the existing structure and adaptive reuse would not emit hazardous materials.

During operation, the Project would only use small quantities of common hazardous substances (such as cleaning solvents). The use of hazardous materials would be small-scale and entirely within the Project Site. Therefore, the Project would not emit hazardous emissions or handle hazardous materials or acutely hazardous materials, substances, or waste within 0.25 mile of an existing school, and operational impacts related to the use of hazardous materials within 0.25 mile of a school would be less than significant.

(4) List of Hazardous Materials Sites

As described in the Draft EIR, the Project Site is not located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not exacerbate the current environmental conditions so at to create a significant hazard to the public or the environment. Therefore, as the Project Site is not located on a list of hazardous material sites, no impact would occur.

(5) Public Airport

As discussed in Section V of the Draft EIR, Other CEQA Considerations, and in the Initial Study (Appendix A-1), the Project Site is not located within 2 miles of a public airport. Thus, the Project would have no impact with respect to safety hazards to public airports.

(6) Private Airstrip

As discussed in Section V of the Draft EIR, Other CEQA Considerations, and in the Initial Study (Appendix A-1), the Project Site is not located within the vicinity of private airstrip. Thus, the Project would have no impact with respect to safety hazards to private airstrips.

(7) Emergency Plans

The construction of the Project would occur within the boundaries of the Project Site. Temporary pedestrian or vehicular public right-of-way closures may be necessary during the construction phase for construction staging, equipment access, and pedestrian safety. Partial lane closures would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in opposing traffic lanes. Additionally, if partial closures to streets surrounding the Project Site become necessary, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

Pursuant to Project Design Feature TRANS-PDF-1, a Construction Management Plan would be implemented during construction of the Project. See Section IV.K, Transportation/Traffic, of the Draft EIR for details of the Construction Management Plan. The Construction Management Plan would consider the nature and timing of specific construction activities and other projects in the vicinity, as well as disclose lane closure information, detour plans, truck routes, and staging plans, and identify specific actions that would reduce the effects from construction of the Project on the surrounding community.

Construction of the Project would not substantially impede public access or travel on public rights-of-way such as Bay Street or Sacramento Street, and would not interfere with any adopted emergency response plan or emergency evacuation plan. Major roadways throughout the City, such as Alameda Street are designated disaster routes. Disaster routes function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. Immediate emergency debris clearance and road/bridge repairs for short-term emergency operations will be emphasized along these routes. The Project would not impede access to these routes. Therefore, Project construction would not impair the implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan, and impacts associated with emergency response and emergency evacuation plans during Project construction would be less than significant.

The Project Applicant would prepare an emergency response plan for the Project, which would include, but not be limited to, the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. The proposed access plan would provide adequate access to and from the Project Site in the event of an emergency. Further, the Project Applicant is required to submit the Project plot plan to the LAFD for review to ensure compliance with applicable Los Angeles Fire Code, California Fire Code, LABC, and National Fire Protection Association standards, thereby ensuring that the Project would not create any undue fire hazard or obstacle to emergency access or response. Therefore, Project operation would not impair the implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan, and impacts associated with emergency response and emergency evacuation plans during Project operation would be less than significant.

(8) Wildland Fires

As discussed in Section V, Other CEQA Considerations, and in the Initial Study (Appendix A-1), the Project Site is not located in a Very High Fire Hazard Severity Zone. The Project Site is not located within a designated Fire Buffer Zone or Mountain Fire District in the 1996 City of Los Angeles Safety Element. Thus, the Project would have no impact with respect to wildland fires.

(9) Cumulative

Development of the Project, in combination with the related projects, has the potential to increase the risk for an accidental release of hazardous materials. Each of the related projects would require evaluation for potential threats to public safety, including those associated with the use, storage, and/or disposal of hazardous materials, ACMs, lead-based paint, PCBs, and oil and gas, and would be required to comply with all applicable local, state, and federal laws, rules, and regulations. The related projects are not expected to be sources of hazardous materials (such as heavy industrial or manufacturing uses). Therefore, with full compliance with all applicable local, state, and federal laws, rules and regulations, as well as implementation of site-specific recommendations for the related projects, the Project would not result in a cumulatively considerable contribution to any unidentified impacts created by one or more related projects. As such, implementation of the Project would not exacerbate the risk of exposure of people or the public to hazards or hazardous materials, and cumulative impacts related to hazards and hazardous materials would be less than significant.

d) Hydrology and Water Quality

(1) Water Quality Standards or Waste Discharge Requirements

(a) Construction Impacts

Construction activities, such as earth moving, maintenance of construction equipment, and handling of construction materials, can contribute to pollutant loading in stormwater runoff. With implementation of the Erosion Control Plan, site-specific Best Management Practices ("BMPs") would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, the Project Applicant would be required to comply with City grading permit regulations and inspections to reduce sedimentation and erosion. During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, would be used and would, therefore, require proper management and disposal. The management of any resultant hazardous wastes could increase the potential for hazardous material releases into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential to release contaminants into groundwater, exacerbate existing contaminants, or cause a violation of regulatory water quality standards.

Construction of the Project would not result in discharge that would cause: (1) pollution which would alter the quality of the water of the State (i.e., Los Angeles River) or groundwater to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the water of the State or groundwater by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. Accordingly, construction of the Project would not violate any water quality standards or waste discharge requirements. Therefore, construction-related impacts on surface water quality and groundwater quality would be less than significant.

(b) Operation Impacts

Project operation would not increase concentrations of the items listed as constituents of concern for the Los Angeles River Watershed. Under section 3.1.3. of the Low Impact Development (LID) Manual, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs

on-site for the volume of water produced by the 85th percentile storm event. The Project would implement either infiltration drywells, capture and use system, or biofiltration planters for managing stormwater runoff in accordance with current LID requirements. Operation of the Project would not result in discharges that would cause: (1) pollution which would alter the quality of the waters of the State (i.e., Los Angeles River) or groundwater to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the State or groundwater by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. As is typical of most urban developments, stormwater runoff has the potential to introduce pollutants into the stormwater system. Potential pollutants include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. The release of pollutants listed above would be reduced or minimized through the implementation of approved LID BMPs. However, the Project is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation.

Stormwater infrastructure on the Project Site, in compliance with LID BMP requirements, would control and treat stormwater runoff to account for the 85th percentile storm event. Implementation of LID BMPs would ensure operational impacts on surface water quality are less than significant. Accordingly, operation of the Project would not violate any water quality standards or waste discharge requirements. Therefore, the Project's potential impact on surface water quality and groundwater quality would be less than significant.

(2) Groundwater

Construction activities for the Project would include excavating down approximately 30 feet for subterranean parking, building the structure, and installing hardscape and landscape around the structure. Groundwater was not encountered during exploration, conducted to a maximum depth of 80 feet below the existing Site grade. The historically highest groundwater level was established by review of the Los Angeles 7.5 Minute Quadrangle Seismic Hazard Evaluation Report, Plate 1.2, Historically Highest Ground Water Contours (CDMG, 2006). Review of this plate indicates that the historically highest groundwater level at the Site was on the order of 150 feet below grade. Therefore, it is highly unlikely that groundwater would be encountered during construction, which would require pumping. Therefore, as Project construction would not adversely affect the rate of groundwater recharge and supply, the Project would not result in a significant impact on groundwater hydrology during construction.

(3) Hydrology and Drainage

Construction activities, such as excavation and grading of soils, would temporarily expose the underlying soils and may make the Project Site temporarily more permeable. Exposed and stockpiled soils could be subject to wind and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to erosion or siltation on- or off-site. The Project would implement an Erosion Control Plan for BMPs during construction to manage runoff and reduce pollutants. The BMPs are designed to contain and filter stormwater and construction watering to prevent runoff from affecting off-site drainage facilities or receiving water bodies. Construction watering activities would be temporary and runoff discharges would be controlled. In addition, the Project would comply with all applicable City grading permit regulations, plans, and inspections to reduce sedimentation and erosion. Through compliance with all NPDES General Construction Permit requirements, including preparation of a Stormwater Pollution Prevention Plans (SWPPP), implementation of BMPs, and compliance with applicable City grading regulations, the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation or

flooding on- or off-site. Similarly, adherence to standard compliance measures during construction activities would not cause flooding, substantially increase or decrease the amount of surface water flow from the Project Site into a water body, or result in a permanent, adverse change to the movement of surface water. Thus, through compliance with U.S. EPA National Pollutant Discharge Elimination System (NPDES) General Construction Permit requirements, implementation of BMPs, and compliance with applicable City grading regulations, construction of the Project would not substantially alter the drainage patterns of the Project Site in a manner that would result in substantial erosion or siltation or flooding. The Project would not result in a permanent adverse change to the movement of surface water. Therefore, construction-related impacts to surface water hydrology and drainage would be less than significant.

The Project would install impervious surfaces including hardscape and structures that would cover approximately 100% of the Project Site. The Site is currently 100% impervious and the Project would not increase the amount of impervious surface. Stormwater would discharge to an approved location in the public right-of-way and not result in infiltration of rainfall that could influence groundwater hydrology. Accordingly, operation of the Project would not substantially alter the drainage patterns of the Project Site in a manner that would result in substantial erosion or siltation or flooding. Therefore, operational impacts to site surface water hydrology and drainage would be less than significant.

(4) Stormwater

The Project would not cause flooding during the 50-year frequency storm event to create runoff that would exceed the capacity of existing or planned drainage systems. In addition, the LID requirements for the Project Site would outline the stormwater treatment post-construction BMPs required to control pollutants associated with storm events up to the 85th percentile storm event. The Project BMPs would reduce the stormwater runoff quality and ensure that the Project would not provide substantial additional sources of polluted runoff. As such, the Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, impacts related to stormwater drainage system capacity and stormwater quality would be less than significant.

(5) Water Quality

The Project would not result in discharges that would cause regulatory standards to be violated and, as such, would not substantially degrade water quality. Therefore, construction and operational impacts on water quality would be less than significant.

(6) Flooding

As discussed in Section V of the Draft EIR, Other CEQA Considerations and in the Initial Study (Appendix A-1), the Project Site is not located in an area identified as potentially subject to 100-year flood. Thus, the Project would have no impact with respect to placing housing within a 100-year flood hazard area or placing structures within a 100-year flood hazard area which would impede or redirect flood flows. Further, the Project Site is not located within an inundation area of any dams or levees. Thus, the Project would have no impact with respect to flooding as a result of the failure of a levee or dam.

(7) Seiche, Tsunami, or Mudflow

As discussed in Section V of the Draft EIR, Other CEQA Considerations and in the Initial Study (Appendix A1), the Project Site is not located in a Tsunami Hazard Area or any major water bodies subject to inundation by seiches or tsunami, and the urbanized and relatively flat area

would not create the potential for mudflow. Thus, the Project would have no impact with respect to seiches, tsunamis, or mudflow.

(8) Cumulative

The geographic context for the cumulative impact analysis on surface water hydrology is the Los Angeles River Watershed. In accordance with City requirements, the Project and related projects would be required to implement BMPs to manage stormwater runoff in accordance with LID guidelines. Furthermore, LADPW reviews projects on a case-by-case basis to ensure sufficient local and regional infrastructure is available to accommodate stormwater runoff. Therefore, potential cumulative impacts associated with the Project on surface water hydrology would be less than significant.

Future growth in the Los Angeles River Watershed would be subject to NPDES requirements relating to water quality for both construction and operation. The Project Site is located in a highly urbanized area, and it is anticipated that future development projects would also be subject to LID requirements. With compliance by the Project and related projects with all applicable laws, rules and regulations, cumulative impacts to surface water quality (would be less than significant.

The geographic context for the cumulative impact analysis on groundwater level is the Central Sub-basin. No water supply wells, spreading grounds, or injection wells are located within a one-mile radius of the Project Site, and the Project would not have an adverse impact on groundwater levels. The Projects is located in a highly urbanized area, and, as such, any potential reduction or increase in groundwater would be minimal in the context of the regional groundwater basin. Project development would not involve the permanent extraction of groundwater from the Project Site or otherwise utilize groundwater. If any related project requires permanent dewatering systems, such systems would be regulated by the SWRCB. Should excavation for other related projects extend beneath the groundwater level, temporary groundwater dewatering systems would be designed and implemented in accordance with SWRCB permit requirements. These dewatering operations would be limited to temporary and local impact to the groundwater level. Similar to the Project, development of the related projects could result in changes in impervious surface area within their respective project sites. As the related projects are located in an urbanized area, any reduction in groundwater recharge due to the overall net change in impervious area within the related project sites would be minimal in the context of the regional groundwater basin. Additionally, although the Project would implement infiltration BMPs, as infiltration systems are designed to infiltrate only the greater of the 85th percentile storm and or the first 0.75 inch of rainfall for any storm event, the infiltration of stormwater as a means of stormwater treatment and management within related project sites would not result in a cumulative effect to groundwater hydrology. Therefore, cumulative impacts to groundwater hydrology would be less than significant.

Future growth in the Central Sub-basin would be subject to Los Angeles Regional Water Quality Control Board (LARWQCB) requirements relating to groundwater quality. The Project would not cause regulatory water quality standard violations, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15, and the Safe Drinking Water Act. As with the Project, the related projects would be unlikely to cause or increase groundwater contamination because compliance with existing statutes and regulations would prevent the related projects from affecting or expanding any potential areas affected by contamination or causing regulatory water quality standards at an existing production well to be violated. Therefore, cumulative impacts to groundwater quality would be less than significant.

Cumulative impacts to hydrology (drainage), surface water quality, and groundwater levels/quality (would be less than significant.

e) Land Use and Planning

(1) Physically Divide an Established Community

The Project site is located in an urbanized area of the City in the Central City North Community Plan Area. As discussed in Section V of the Draft EIR, Other CEQA Considerations, and in the Initial Study (Appendix A-1), the Project Site would not physically disrupt an established community. As development of the Project would occur entirely within the Project Site boundaries, the Project would not physically divide, disrupt, or isolate an established community. Rather, implementation of the Project would result in further infill of an already developed community with similar and compatible land uses. Thus, the Project (would have no impact with respect to physically disrupting an established community.

(2) Consistency with Applicable Plans and Policies

The Project would be substantially compatible with the surrounding land uses. To be "consistent" with a general plan, a project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning the project must be "in agreement or harmony with the applicable plan." (*Sequoyah Hills Homeowners Assn. v. Cnty. of Oakland* (1993) 23 Cal.App.4th 704, 717-18; see also *Greenebaum v. City of Los Angeles* (1984) 153 Cal.App.3d 391, 406.) Further, "[a]n action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment." (*Friends of Lagoon Valley v. City of Vacaville* (2007) 154 Cal. App. 4th 807, 817.)

Various local plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the requirements and policies of SCAG's 2016-2040 RTP/SCS and Regional Comprehensive Plan (RCP) and the City's General Plan Framework Element, Health and Wellness Element, Housing Element, Community Plan, and Los Angeles Municipal Code. The Project would be compatible with applicable plans and policies.

2016-2040 SCAG RTP/SCS: A discussion of the Project's consistency with the policies applicable to individual development projects in the 2016-2040 RTP/SCS is presented in Table IV.G-1 of the Draft EIR. While the RTP/SCS focuses on transportation investments in the SCAG region, as demonstrated, the Project would be consistent with the applicable 2016-2040 RTP/SCS policies, and, therefore, a less-than significant impact would occur.

SCAG RCP: A discussion of the Project's consistency with the policies applicable to individual development projects in the RCP is presented in Table IV.G-2 of the Draft EIR. As demonstrated, the Project would be consistent with the applicable RCP policies, and, therefore, a less-than significant impact would occur.

General Plan Framework Element: Table IV.G-3 of the Draft EIR lists the goals, objectives, and policies for land use that apply to developers in collaboration with local government. As shown, the Project would be consistent with the applicable policies of the Framework Element for each land use (within a developer's control or developer focused). Table IV.G-3 of the Draft EIR also presents the consistency analysis for each of the Framework Element chapters. As shown therein, the Project would be consistent with the applicable policies, and, therefore, a less-than-significant impact would occur.

General Plan Housing Element: The Project's consistency with the applicable policies set forth in the Housing Element of the General Plan is analyzed in Table IV.G-4 of the Draft EIR. The Project would provide a variety of housing types (two, three, and four bedroom units) in an area

that is pedestrian-friendly and served by public transit; facilitate new construction of a range of different housing types; and expand opportunities for residential development, particularly in the Industrial South subarea. Specifically, the Project would develop a total of 110 live/work units. The Project would also promote the construction of green buildings by incorporating sustainable design features, including energy conservation, water conservation, alternative transportation programs, a pedestrian- and bicycle-friendly site design, and waste reduction measures. Therefore, the Project would be consistent with the applicable policies set forth in the Housing Element.

General Plan Health and Wellness Element: The Project's consistency with the General Plan Health and Wellness Element land use policies is discussed in Table IV.G-5 of the Draft EIR. As shown therein, the Project would be consistent with the applicable policies, and, therefore, a less-than-significant impact would occur.

General Plan Conservation Element: The Project's consistency with the City's General Plan Conservation Element objectives and policies is discussed on page IV.G-36 of the Draft EIR. The Conservation Element established an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities. As the Project Site and buildings do not appear eligible for listing in the National or California Registers nor are they listed as a City of Los Angeles Historic Cultural Monument, they are not historical resources for purposes of CEQA.

Central City North Community Plan: The Project Site is located within the Central City North Community Plan (Community Plan), which was adopted in 2000. The Community Plan objectives and policies are included in Table IV.G-6 of the Draft EIR. As shown therein, the Project would be consistent with the applicable objectives and policies and therefore, no significant impacts would occur.

Citywide Design Guidelines: The City's Citywide Design Guidelines that are applicable to the Project are discussed on pages IV.G-48 to IV.G-50 of the Draft EIR. As shown, the Project would be consistent with the applicable guidelines, and, therefore, a less-than-significant impact would occur.

City's Walkability Checklist: The Walkability Checklist consists of a list of design elements intended to improve the pedestrian environment, protect neighborhood character, and promote high quality urban form. The Project would incorporate, where applicable, many of the implementation strategies presented in the Walkability Checklist and would implement a number of relevant design elements in order to foster a visually appealing pedestrian environment. The Project would support the applicable Walkability Checklist objectives and implement relevant strategies as described in the specific elements above. As such, the Project would be consistent with relevant aspects of the Walkability Checklist.

Industrial Land Use Policies: The City's Industrial Land Use Policy (ILUP) project is a comprehensive study of the use of industrial-zoned land within the City of Los Angeles. As part of this effort, the January 3, 2008 Memorandum on Staff Direction Regarding Industrial Land Use and Potential Conversion to Residential or Other Uses (ILUP Memo) underscores that the City's adopted policy is to retain industrial land for job producing uses. The ILUP Clarification Memo states that the ILUP Memo was not intended to predetermine land use decisions or presuppose any future land use changes. Furthermore, the ILUP Clarification Memo states that the community benefits are not requirements that can be imposed by the Planning Department. In consideration of the foregoing discussion, it is concluded that the Project would not result in a significant impact with respect to the City's policies regarding the use and preservation of

industrial land use. See also the Response to Comment Carpenters-4 of the Final EIR, which discusses the ILUP applicable policies and the changing land uses in the immediate area due to redevelopment, infill, and adaptive reuse.

Los Angeles Municipal Code: The Project Site is located in the M3 (Heavy Industrial) zone. Uses that are allowed in an M3 zone include all of the uses allowed in the M1, M2, and MR2 zones and, as such, generally include those uses allowed in the C1, C1.5, and C2 zones (see LAMC Section 12.20[A][1]). Permitted uses include, among others: restaurants, business and professional offices, medical clinics and laboratories, grocery stores, retail and service stores, pharmacies, drugstores, manufacturing and industrial activities, research and development, storage, and parking. Buildings containing dwelling units or guest rooms are prohibited in the M3 zone.

The Applicant requests General Plan Amendments to revise the land use designation in the Central City North Community Plan from Heavy Industrial (corresponding zone M3) to Commercial Industrial (corresponding zones CM, and P) and to eliminate two footnotes prohibiting "2" Height District designations in this area. As part of the discretionary requests for this application, the Applicant is also requesting a Vesting Zone and Height District change from the M3-1-RIO Zone to the CM-2-RIO Zone. The findings for the requested Vesting Zone and Height District change are addressed in the sections below.

The requested General Plan Amendments from Heavy Industrial to Commercial Industrial and the elimination of floor area constraints creates a development site consistent, in terms of uses and intensities, with recent successful developments in the area. These developments, both conversion and ground up, are consistent with the Central City North Community Plan's description of the Artists-in-Residence Subarea District, whose southern boundary is one block north of the Project, as an area "primarily made up of old warehouses now converted to artists lofts and studios." The description of the Artists-in-Residence District also notes that the Community Plan "encourages the continued and expanded development of a thriving artists-in-residence community."

The General Plan Amendment to Commercial Industrial would permit the construction of new Live/Work units, following the procedures of the CM Zone ordinance. The introduction of limit residential development is a key component of the area's economic rejuvenation. The deletion of the footnotes limiting floor area on the site is needed to include both residential and commercial uses in sufficient intensities to facilitate the cost of redeveloping the site with a mixed use, mixed income development. The Applicant's request for a General Plan Amendment to change the designation to Commercial Industrial, concurrently with the request for a Vesting Zone Change from M3 to CM-2-RIO Zone allows limited residential and a significant amount of job creating creative space consistent with the changing land use pattern in the area and the nearby Artist-in-Residence District as identified in the Central City North Community Plan. The proposed General Plan Amendment complies with City Charter Sections 556 and 558 in that the requested amendment reflects the land use patterns, trends and uses in the immediate area, which is developed with mixed-use projects containing live work quarters on properties zoned for industrial uses. The proposed General Plan Amendment does further the intent, purposes and objectives of the Central City North Community Plan which "encourages the continued and expanded development of a thriving artists-in-residence community" on lands that are currently zoned industrial with the land use designation of Heavy Industrial. The development of a mixed-use project containing commercial space, Live/Work units, creative office and affordable housing on property with a land use designation of Commercial Industrial is supported by the various goals, objectives and policies of the General Plan Framework Element, the Community Plan, the Housing Element and the Transportation Element.

On May 10, 2010 the City adopted Ordinance No. 181,133 (the "Ordinance") that established the Joint Live/Work quarters in the CM Zone in order to enable and regulate live/work uses in areas of the City with General Plan land use designation of Commercial Industrial. Based on this legislation, the Applicant requests a Vesting Zone and Height District change from the M3-1-RIO Zone to the CM-2-RIO Zone, corresponding to the herein requested General Plan Amendment from Heavy Industrial to Commercial Industrial and the lifting of floor area constraints. The proposed CM-2-RIO Vesting Zone and Height District change seeks to create consistency for new ground-up projects with neighboring properties that were converted from industrial buildings to mixed-use projects and joint live/work quarters, as adaptive reuse projects, without having to request a zone and height district change in order to achieve residential projects of similar use, size and density. The CM-2-RIO Zone would allow a development similar to other industrial buildings now converted to residential uses, creative office space and commercial floor area. The CM-2-RIO Zone would permit the construction of new Live/Work units, following procedures adopted by the Ordinance. The Applicant's request for a Vesting Zone and Height District change from M3 to CM-2-RIO is consistent with the uses and intensities found in the Artist-in-Residence District and planned for in the City's recent Industrial lands long range visioning.

The General Plan also recognizes that "some industrially zoned lands may be inappropriate for new industries and should be converted to other land uses. Where such lands are to be converted, their appropriate use shall be subject to future planning studies." In this instance the City has determined that there is a need for a different tool specifically to address demand for live/work units in new construction.

In order to be constructed, the Project Applicant requested a General Plan Amendment to alter the Central City North Community Plan's land use designation for the Project site from Heavy Industrial to Commercial Industrial to allow live/work. The Applicants proposed CM-2-RIO Vesting Zone and Height District change would be consistent with the proposed General Plan Amendments. The CM-2-RIO Zone is an industrial zone, which permits C2 Zone commercial uses, and limited light industrial uses, new Live/Work units, and is intended to promote a mix of uses that would be compatible with the surrounding neighborhood. The CM-2-RIO Zone provides a mechanism to increase Live/Work opportunities, enhance neighborhoods, create jobs and revitalize older industrial areas. The CM-2-RIO Zone is intended to accommodate projected population growth in mixed-use projects that are compatible with existing warehouse and industrial neighborhoods. The purpose of the CM Zone reflects the HI Zone insofar as encouraging and accommodating Live/Work development. The proposed Vesting Zone and Height District change to CM-2-RIO would be compatible with the existing industrial and warehouse uses and the expanding mixed-use, creative office and commercial uses that are increasingly common in the surrounding neighborhood.

The proposed CM-2-RIO Zone would allow the development of a maximum of 110 new Live/Work units and significant amounts of floor area dedicated to employment uses both of which are appropriately located near transit, services, facilities and Downtown Los Angeles urban core. The CM-2-RIO Zone permits new ground–up Live/Work uses that are otherwise not permitted in the M3 Zone unless an existing industrial building is converted either by way of a conditional use permit process or under the Adaptive Reuse Ordinance. The Height District change ensures the project can achieve floor area intensities required for the successful redevelopment of the site. The character of the neighborhood has transitioned from more traditional industrial used to relatively high density Live/Work uses, neighborhood commercial uses and creative offices. The Project site is an underutilized surface parking lot with an abandoned industrial warehouse that generates few benefits to the neighborhood or the City. The construction of a new mixed-use project, with Live/Work units, creative office space and neighborhood-serving retail commercial space, will create jobs, enhance the tax revenue economics, livability and security of the neighborhood. Such a Project is consistent with other

similar uses in the vicinity such as the Biscuit Lofts at 1850 Industrial St. There is also a positive trend of creative office expansion in the vicinity exemplified by the reuse of the Ford Motor building at 715-829 South Santa Fe Street and the Coca Cola building at 963 E. 4th Street.

These new businesses will generate new revenue streams to the City, facilitating an improved economic environment for an area in transition to higher paying jobs that will provide substantial further economic benefits to the area and the City, and as a result, being consistent with the General Plan's objectives to promote economic growth and job opportunities. Based on the analysis provided above, the Project would be substantially consistent with applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site.

Therefore, the Project would not be in substantial conflict with either the General Plan or Community Plan, or the whole of relevant environmental policies in other applicable plans. As such, impacts related to land use consistency would be less than significant. Based on the analysis provided above, the Project would be substantially consistent with the whole of applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site. Therefore, the Project would not be in substantial conflict with either the Community Plan, or the whole of relevant environmental policies in other applicable plans. As such, impacts related to land use consistency would be less than significant.

(3) Land Use Compatibility

The surrounding area is characterized by a mix of light manufacturing, commercial, office, restaurant, and residential uses, especially as the Arts District ongoing evolution to a residential and commercial community continues. The Project would combine these uses at one site. Thus, while the Project would change the character of the land uses on the Project Site, the Project would increase housing and employment opportunities in the area, and would provide greater density near transit services, including existing bus lines. In addition, the Project would provide and be consistent with existing uses nearby that include commercial and office use, and would not interfere with functionality of the Site. The Project would increase pedestrian connectivity at the street level. For these reasons, impacts with respect to land use compatibility would be less than significant.

(4) Habitat Conservation Plan or Natural Community Conservation Plan

As discussed in Section V of the Draft EIR, Other CEQA Considerations and in the Initial Study (Appendix A1), the Project Site is located in an urbanized area and does not support any habitat or natural community. Thus, the Project would have no impact with respect to any habitat or natural community conservation plan.

(5) Cumulative

As indicated in Section III, Environmental Setting, of the Draft EIR, there are 60 related projects in the vicinity of the Project Site. The related projects generally consist of infill development and redevelopment of existing uses, including mixed-use, residential, commercial, office, restaurant, retail, school, hotel, and combinations thereof. In addition, as described above and in Section III, Environmental Setting, of the Draft EIR, the Central City North Community Plan Update, once adopted, will be a long-range plan designed to accommodate growth in the Community Plan area until 2040.

As with the Project, the related projects would be required to comply with relevant land use policies and regulations through review by City regulatory agencies and would be subject to CEQA review. Therefore, the Project and the related projects would not have cumulatively significant land use impacts. In addition, as discussed above, as the Project would not be in

substantial conflict with either the General Plan or Community Plan, or the whole of relevant environmental policies in other applicable plans, the Project would not incrementally contribute to cumulative inconsistencies with respect to land use plans and relevant environmental policies. Therefore, cumulative impacts with regard to land use consistency would not be cumulatively considerable and would be less than significant.

The related projects would not cause cumulative land use impacts related to land use compatibility due to either distance and/or existing intervening development. In any event, based on the mix of uses and buildings that currently comprise the community as well as the related projects that are proposed, approved, or are under construction, the Project would be compatible with the various existing developments and related projects in the immediate vicinity of the Project Site and surrounding area. The Project complements and continues the recent development of the immediate neighborhood and the vicinity of the Artist-In-Residence District with mixed-use buildings and Live/Work and commercial uses. According to a recent report for the Coca Cola building, there were approximately six restaurants within walking distance of the Project site. Together with the redevelopment of the Ford Motor Company building shows the trend of mixed land use development extending southerly in the Community Plan area.

In addition, while the Project, in combination with the related projects, represents a continuing trend of infill development at increased densities, future development inclusive of the Project would also serve to modernize the Project vicinity and provide sufficient housing and amenities to serve the needs of the growing population. Such related projects are not expected to fundamentally alter the existing land use relationships in the community, and, as with the Project, the related projects would be required to comply with relevant land use policies and regulations. For these reasons, the Project's incremental contribution with respect to land use compatibility would not be cumulatively considerable, and the cumulative impact of the Project and the related projects on land use compatibility would be less than significant.

f) Noise

(1) Noise

(a) On-Site Construction

For this Project, noise impacts were modeled using the noise reference levels of excavators and front-end loaders, as these vehicles would be utilized extensively to excavate and grade for the Project. Excavators can produce hourly average noise levels of 76.7 dBA Leq at a reference distance of 50 feet; front-end loaders, 75.1 dBA Leq. Compounding their noise impacts is the fact that these vehicles commonly operate in tandem. Excavators remove soils and debris, and front-end loaders transport this matter to on-site stockpiles or haul trucks for off-site export. As a result, excavators and front-end loaders typically have the greatest potential to cause sustained and significant noise impacts at nearby receptors. Though other construction equipment may produce greater average or maximum noise levels than excavators and front-end loaders, their usage would be more intermittent in nature or shorter in duration. For example, graders can produce average noise levels of 81.2 dBA Leq at a distance of 50 feet. However, graders would not likely be required for more than a few work days, whereas excavators and front-end loaders would be required extensively throughout the Project's demolition, site preparation, and grading phases. Tools such as auger drills, which produce average noise levels of 77.7 dBA Leq, would produce intermittent noise events when drilling, followed by longer periods of inactivity. Auger drills also would work individually and not in tandem with other major noise-generating construction vehicles or equipment. Therefore, excavator and loader noise levels are a better representation of the Project's most substantial construction noise impact.

As shown in Table IV.H-8 of the Draft EIR, Art House lofts would experience a construction-related noise increase of just 0.1 dBA. This impact would be imperceptible and far below the L.A. CEQA Thresholds Guide's 5 dBA noise increase threshold for construction activities lasting more than 10 days in a 3 month period. As a result, this impact would be considered less than significant.

(b) Off-Site Construction

Grading activities would require haul trucks to export excavated soils from the Project site to a regional landfill. Such activity can marginally increase ambient noise levels at any roadside sensitive receptors. However, the Project is located in a transitional neighborhood with primarily manufacturing, industrial, and warehouse land uses. Haul trucks would access the I-10 Freeway via Santa Fe Avenue and 8th Street; there are no sensitive residential streets in the vicinity of the Project. As a result, the Project's impact from off-site construction noise sources would be considered less than significant.

(c) On-Site Operation

The Project is located in an M3 "Heavy Industrial" zone and is surrounded by other M3 parcels consisting of non-sensitive commercial, industrial, manufacturing, and warehouse land uses. The nearest sensitive receptor, Art House Lofts, is located over 400 feet south of the Project, and there are numerous intervening structures blocking the line of sight between this receptor and the Project. The Project would likely have no audible impact from operational noise sources at this receptor. With respect to these factors, the Project's noise impact from its on-site operational noise sources would be considered less than significant.

(d) Off-Site Operation

The majority of the Project's operational noise impacts would result from off-site mobile sources associated with its net new daily trips. On a typical weekday, the Project is forecast to generate an estimated 2,394 net new daily trips, including 243 A.M. peak hour trips and 281 P.M. peak hour trips. The noise impact of these vehicle trips were modeled using the Federal Highway Administration's (FHWA) Traffic Noise Model 2.5 (TNM 2.5). For the analysis, an existing year (2017) no project scenario was compared to an existing year with project scenario. As shown in Table IV.H-9 in the Draft EIR, the Project by itself would have a negligible impact on surrounding roadside ambient noise levels. The 24-hour CNEL impact similarly be minimal, far below L.A. CEQA Thresholds Guide criteria for significant operational noise impacts, which begin at 3 dBA. This impact would be considered less than significant.

(2) Vibration

(a) Construction

Construction vibration is discussed under Section 5. Less Than Significant Impacts With Mitigation, below.

(b) Operation

During Project operations, there would be no significant stationary sources of ground-borne vibration, such as heavy equipment or industrial operations. Minimal levels of operational ground-borne vibration in the Project's vicinity would be generated by its related vehicle travel on local roadways. However, most vibrations from road vehicles are below 65 VdB and imperceptible. Therefore, the Project's long-term vibration impacts would be considered less than significant.

(3) Public Airport

As discussed in Section V of the Draft EIR, Other CEQA Considerations and in the Initial Study (Appendix A-1), the Project Site would not expose people to excessive noise levels related to the operation of a public airport. Thus, the Project would have no impact with respect to the operation of a public airport.

(4) Private Airstrip

As discussed in Section V of the Draft EIR, Other CEQA Considerations and in the Initial Study (Appendix A-1), the Project Site would not expose people to excessive noise levels related to the operation of a private airstrip. Thus, the Project would have no impact with respect to the operation of a private airstrip.

(5) Cumulative

(a) Construction Noise

Related Project No. 23 (2130 E. Violet Street) is located approximately 220 feet north of the Project Site and over 950 feet north of the Project's Art House Lofts receptor. Related Project No. 35 (1000 S. Santa Fe Avenue) is located just west of the Project Site and approximately 550 feet north of the Art House Lofts receptor.

Given the related projects distance from Art House Lofts, each related project has no potential to contribute to a cumulative impact at this receptor as a result of on-site construction noise levels. The distances from the related projects to Art House Lofts is greater than the 500-foot screening distance for construction noise impacts suggested by the L.A. CEQA Thresholds Guide. Off-site cumulative construction noise impacts could occur if haul trucks for the Project and related projects were to utilize the same roadways on their respective haul routes. However, roadways in the vicinity of the Project have elevated noise levels from traffic, both from automobiles and trucks. Land uses along Santa Fe Avenue towards the I-10 Freeway are zoned M3 "Heavy Industrial" and consist mainly of industrial, manufacturing, commercial, and warehouse uses. Therefore, the Project would not contribute to a cumulatively considerable off-site construction noise impact.

(b) Operation Noise

The Project's nearest noise-sensitive receptor (Art House Lofts) is located over 400 feet to the south and would not be likely to experience any audible on-site operational noises from the Project. Therefore, the Project Therefore, the Project would not contribute to a cumulatively considerable on-site operational noise impact. Table IV.H-10 in the Draft EIR shows the cumulative noise impact that Project and related project traffic could have on ambient noise levels surrounding the Project. As discussed, the overall 24-hour CNEL impact on ambient noise levels would not exceed 3 dBA. Therefore, the Project would not contribute to a cumulatively considerable off-site operational noise impact.

(c) Operation Vibration

The Project would not contain any significant on-site sources of groundborne vibration. Typically, on-site sources of groundborne vibration are associated with industrial processes or equipment. The Project would generate minimal levels of off-site groundborne vibration from its related traffic. However, groundborne vibration from vehicles is typically below levels of perception. The Project would have a negligible operational vibration impact. Related projects in the vicinity of the Project are all residential, office, and/or commercial in nature. They also would

not contain significant on-site sources of groundborne vibration, and their related vehicle travel would also generate negligible levels of groundborne vibration. Therefore, the Project would not contribute to a cumulatively considerable operational vibration impact.

g) Population and Housing

(1) Substantial Population Growth

(a) Construction

Due to the employment patterns of construction workers in the region, and the operation of the market for construction labor, construction workers are not likely, to any notable degree, to relocate their households as a consequence of the construction job opportunities presented by the Project. The construction industry differs from most other industry sectors in several ways that are relevant to potential impacts on housing, including (1) there is no regular place of work; (2) many construction workers are highly specialized and move from job site to job site as dictated by the demand for their skills; and (3) the work requirements of most construction projects are highly specialized and workers are employed on a job site as long as their skills are needed to complete a particular phase of the construction process. It is reasonable to assume, therefore, that Project-related construction workers would not relocate their households' places of residence as a direct consequence of working on the Project. Thus, there would not be any significant population and/or housing impacts related to household growth in the City of Los Angeles due to Project construction. Therefore, construction-related impacts related to population and housing would be less than significant, and no mitigation measures are required.

Project development would generate construction workers on-site during the grading and excavation, and building construction and finishing phases. However, individual construction projects generally do not generate new employment within the region. Rather, there is a pool of construction workers who move from project to project as work is available. The Project, would therefore, support the regional pool of construction workers and also contribute additional indirect jobs in a wide range of industries throughout the region resulting from purchases of construction-related supplies, goods and services, and household expenditures by direct and indirect employees. Construction of the Project would not indirectly (e.g., through the extensions of roadways and/or other infrastructure) induce substantial population, housing, and/or employment growth in the area. Therefore, since the construction employment related to the Project would be temporary and would not exceed expected growth, construction-related employment impacts would be less than significant.

(b) Operation

Population generation is shown in Table IV.I-2 of the Draft EIR. It is estimated that the Project would generate approximately 268 residents. As shown in Table IV.I-4 of the Draft EIR, based on SCAG's 2016–2040 RTP/SCS, the population generated by the Project would represent approximately 0.20 percent of the projected growth in the City of Los Angeles between 2017 and 2022 (i.e., the Project's baseline and buildout years). As such, the new residents constitute a small percentage of City growth. Therefore, Project impacts related to population growth would be less than significant.

As stated in the City's 2013–2021 Housing Element, the City remains in need of new dwelling units to serve both current and projected populations. While the Project would not eliminate the housing shortage in the City, it would incrementally advance the goal of generating more housing for the region. The Project would generate 110 units. As shown in Table IV.I-4 of the Draft EIR, based on SCAG's 2016–2040 RTP/SCS, the housing generated by the Project would represent approximately 0.17 percent of the projected growth in the City of Los Angeles

between 2017 and 2022 (i.e., the Project's baseline and buildout years). Based on the above analysis, the Project would not cause housing growth to exceed projected/planned levels for the Project's buildout year. As such, development of the Project would not result in an adverse physical change in the environment. Impacts relating to housing growth would be less than significant.

Employee generation is shown in Table IV.I-3 of the Draft EIR. It is estimated that the Project would generate approximately 662 jobs (in total, this number on-site at a given time would be reduced per shift and other operational needs). As shown in Table IV.I-4, based on SCAG's 2016–2040 RTP/SCS, the employees generated by the Project would represent approximately 0.78 percent of the projected growth in the City of Los Angeles between 2017 and 2022 (i.e., the Project's baseline and buildout years). Therefore, Project-related employment generation would be within and, thus, consistent with SCAG's employment forecasts for the City of Los Angeles. Impacts relating to employees would be less than significant.

The Project Site is located in an urbanized area of the City and developed. Development of the Project would connect to the existing infrastructure currently being used by the adjacent uses surrounding the Project Site. These uses would include a range of permanent and part-time positions that are typically filled by persons already residing in the vicinity of the workplace or those who generally do not relocate their households due to such employment opportunities. Any indirect demand for housing would be fulfilled by a combination of vacancies in the surrounding housing market and from other new units in the vicinity of the Project. As such, the Project's indirect housing demand would not cause housing growth to exceed projected/planned levels for the Project's buildout year. In addition, Project operation would not induce substantial growth through the introduction of new and/or an extension of existing roadways and/or utility infrastructure.

While the Project is consistent with various regional and local housing policies and employment forecasts, it would not, in and of itself, foster new growth in the area by removing impediments to growth. The Project is also compatible with adopted local housing growth policies. In addition, the Project would assist the City in meeting its fair share of regional housing needs, support the regional jobs-housing balance, provide new housing and employment opportunities, and conform to City policies supporting higher density, compact, and infill housing development. Consistent with the SCAG principles, the Project would add to the City's housing supply while meeting other smart growth environmental objectives such as locating housing and jobs in close proximity to reduce VMTs (vehicle miles traveled), increasing housing density, and promoting alternatives to transportation via private automobiles. Therefore, the Project would not cause substantial 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. The Project would be consistent with applicable employment growth plans and policies of the City. The Project would: (1) concentrate growth in accordance with the guidelines set forth by the applicable regional and local regulatory frameworks; (2) support the creation of new jobs; and (3) include a mix of commercial and residential uses, all in the same development, thereby advancing the goal of providing mixed-use facilities within the urbanized areas of the City of Los Angeles. The Project would result in new jobs and economic activity. The new jobs associated with the Project would be within SCAG's employment growth forecast for the City of Los Angeles. As such, Project impacts with respect to employment would be less than significant. Impacts related to induced substantial population growth in an area, either directly or indirectly would be less than significant.

(2) Displacement of Existing Housing

As discussed in Section V of the Draft EIR, Other CEQA Considerations, and in the Initial Study (Appendix A-1), the Project Site does not contain housing and would not displace any existing

housing, necessitating the construction of replacement housing elsewhere. Thus, the Project would have no impact with respect to the displacement of any existing housing.

(3) Displacement of People

As discussed in Section V of the Draft EIR, Other CEQA Considerations, and in the Initial Study (Appendix A-1), the Project Site does not contain housing and would not displace any people, necessitating the construction of replacement housing elsewhere. Thus, the Project would have no impact with respect to the displacement of any people.

(4) Cumulative

(a) Construction

Construction of the related projects would require the participation of construction workers that would be hired from a mobile regional construction work force that moves from project to project. Typically, construction workers pass through various development projects on an intermittent basis as their particular trades are required. Given the mobility and short durations of work at a particular site and the large construction labor pool that can be drawn upon in the region, construction employees would not be expected to relocate residences within this region or move from other regions as a result of their work on the related projects. As the related projects would draw on an existing labor pool, the construction impacts on the number of employees in the region would be negligible. Further, given the temporary nature of the construction activity, the mobility of construction workers and availability of a labor pool to draw on, construction workers would not be expected to have notable impact on the demand for housing or affect general housing occupancy and population patterns. The addition of construction employment opportunities would contribute to the economic well-being of the City and region by creating direct employment opportunities for the individuals hired and indirect contributions to the local and regional economy through expenditures of those employees. Construction of the Project would have a less-than-significant cumulative impact on population growth, housing, and employment.

(b) Operation

The Project and related projects are located in SCAG's City of Los Angeles Subregion. Implementation of the Project, in conjunction with the related projects identified in Section III of the Draft EIR, Environmental Setting, would increase the number of housing units, residents, and employees in the area, compared to existing conditions.

Population generation is shown in Table IV.I-7 of the Draft EIR, Related Projects Estimated Population Generation. It is estimated that the total cumulative growth (Project + related projects) would generate approximately 38,832 persons from 15,980 total units (Project + related projects). The Project represents 0.7 percent of the total persons and units. As shown in Table IV.I-9 of the Draft EIR, based on SCAG's 2016–2040 RTP/SCS, the population generated by the total cumulative growth would represent approximately 28 percent of the projected growth in the City of Los Angeles between 2017 and 2022 (i.e., the Project's baseline and buildout years, respectively). Accordingly, the Project's contribution would not be considered cumulatively considerable.

As shown in Table IV.I-9 of the Draft EIR, based on SCAG's 2016–2040 RTP/SCS, the housing generated by the total cumulative growth would represent approximately 24 percent of the projected growth in the City of Los Angeles between 2017 and 2022 (i.e., the Project's baseline and buildout years, respectively). The increase in housing reflects the ongoing transition in Downtown from a predominately commercial and industrial center to a mixed-use residential

and commercial center. This increase would provide housing near transit. However, the housing addition due to the Project would represent only 0.33 percent of the cumulative total. Accordingly, the Project's contribution would not be considered cumulatively considerable.

Employee generation is shown in Table IV.I-8 of the Draft EIR, Related Projects Estimated Employee Generation. It is estimated that the total cumulative growth in employment (Project + related projects in the City of Los Angeles) would generate approximately 19,016 employees. As shown in Table IV.I-9, based on SCAG's 2016–2040 RTP/SCS, the employment generated by the total cumulative growth would represent approximately 22 percent of the projected growth in the City of Los Angeles between 2017 and 2022 (i.e., the Project's baseline and buildout years, respectively). These new jobs would increase the number of transit-adjacent workplaces, which would support the policies intended to reduce VMT. The Project's contribution of the cumulative total would not represent a considerable percentage of the estimated employment growth in the City of Los Angeles and, as such, its cumulative employment impact would be less than significant. Operation of the Project would have a less-than-significant cumulative impact on population growth, housing, and employment.

h) Public Services

(1) Fire Services

(a) Construction

Project construction would require limited exposure to combustible materials, such as wood, plastics, sawdust, coverings and coatings and to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. While fires and medical emergencies can occur on construction sites, compliance with the OSHA and Fire and Building Code requirements would minimize the risk of fire and medical emergencies on the Project Site. Project construction could also potentially impact the provision of LAFD services in the Project vicinity as a result of construction impacts to the surrounding roadways. While construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and the construction of utility line connections.

Construction activities also would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Construction delivery/haul trucks would generally travel along Santa Fe and use the on-ramp to I-10 freeway. Thus, although construction activities would be short-term and temporary for the area, Project construction activities could temporarily affect emergency response for emergency vehicles due to increased traffic and temporary lane closures on immediately adjacent streets during the Project's construction phase. However, given the permitted hours of construction and nature of construction projects, daily construction trips would typically be completed prior to PM peak hours.

With implementation of the Project Design Feature TRANS-PDF-1 (Construction Management Plan) (see Section IV.K, Transportation/Traffic, of the Draft EIR), construction truck trips would not cause significant impacts during the AM peak and PM peak hours for peak construction truck activity and to emergency vehicles. In addition, TRANS-PDF-1 would ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Project would also employ temporary traffic controls, such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access.

Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site is kept unobstructed at all times and traffic flow is maintained on adjacent right-of-ways. Furthermore, drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Based on the above, construction of the Project would not impact LAFD services to the extent that there would be a need for new or expanded fire facilities in order to maintain LAFD's capability to serve the Project Site. Therefore, fire protection and emergency service impacts associated with construction of the Project would be less than significant.

(b) Operation

The Project Site is expected to continue to be served by Fire Station No. 17, the first-in station for the Project Site. In addition, Fire Station Nos. 9, 4, 25, and 2 would continue to be available to serve the Project Site in the event of an emergency. The Project Site is currently a vacant use that generates very low demand for LAFD fire protection services. As no housing currently exists on the Project Site, there are currently no residents on the Project Site that generate a direct demand for LAFD fire protection services. The Project would include the development of new multi-family residential units, which would generate a new residential population in the service area of Fire Station No. 17. The Project would generate approximately 268 residents. In addition, the Project would generate approximately 662 employees. Therefore, the Project's population would increase the demand for LAFD fire protection services. However, the Project would implement Los Angeles Building and Fire Code requirements, including, but not limited to, structural design, building materials, site access, clearances, hydrants, fire flow, storage and management of hazardous materials, alarm and communications systems, and building sprinkler systems.

Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, prior to the issuance of a building permit. In addition, as described above, the Project, as a high-rise structure, is required by the Section 57.4705.4 of the LAMC to provide an EHLF, as described in Subsection 2.a.(3)(e), or to implement one of two options to forgo an EHLF. The Project would comply with Option 2 of LAFD Requirement No. 10 and acquire approval from the Fire Marshal for this option. In compliance with Option 2, the Project would provide all applicable life safety features, including automatic fire sprinklers, a video camera surveillance system, egress stairways, fire service access elevators, stairways with roof access, enclosed elevator lobbies, and escalator openings or stairways.

The Project Site is located within the distance specified by Table 507.3.3 of the Fire Code. Station No. 17 is within 1 mile away and contains a Task Force (truck company and engine company)20 and an ambulance. Thus, the Project Site complies with the Fire Code's response distances. The Project is within the maximum response distance of a fire station with adequate equipment.

The Project would be required to install additional hydrant(s) to meet City fire flow requirements. As such, the Project Applicant will coordinate with LADWP to install necessary improvements to the off-site fire water system in accordance with City standards. Therefore, with construction of the proposed fire water system improvements (connections to the existing water mains) and the installation of an additional fire hydrant(s) within the public right-of-way to meet City fire flow requirements set forth in Section 57.507.3.1 of the LAMC, the Project would meet the fire flow requirements.

The Project would not substantially impede public access or travel on public rights-of-way such as Bay Street or Sacramento Street, and would not interfere with any adopted emergency response plan or emergency evacuation plan. The nearest disaster routes include San Pedro Street approximately 1.3 mile northwest of the Project Site, and 1st Street approximately 1.2 mile north of the Project Site.25 Disaster routes function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. Immediate emergency debris clearance and road/bridge repairs for short-term emergency operations will be emphasized along these routes. The Project would not impede these routes. Emergency access would be maintained at all times. Emergency vehicle access to the Project Site would continue to be provided from local and major roadways near the Project Site.

Based on the analysis above, Project operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility, the construction of which would cause significant environmental effects, in order to maintain service and would not inhibit LAFD emergency response. Therefore, impacts to fire protection and EMS during Project construction and operation would be less than significant, and no mitigation measures are required. Furthermore, as described in Subsection 3.b., consistent with City of Hayward v. Trustees of California State University (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and the obligation to provide adequate fire and EMS is the responsibility of the City. Thus, the need for additional fire protection services is not an environmental impact that CEQA requires a project applicant to mitigate.

(c) Cumulative

The increase in development and residential service populations from the Project, related projects, and other future development in the Community Plan area would result in a cumulative increase in the demand for LAFD services and could have a cumulative impact on fire services if the Project, together with other development in the service area, did not comply with LAFD requirements for design and construction. However, similar to the Project, the related projects would be reviewed by LAFD on a project-by-project basis to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts to fire protection. Furthermore, each related project would be required to comply with regulatory requirements related to fire protection and EMS. As discussed above, each related project and other future development that exceeds the maximum applicable LAMC response distance standards would be required to install automatic fire sprinkler systems in order to compensate for the additional response distance.

In addition, the Project, each related project, and other future development projects in the Community Plan area would be subject to the City's standard construction permitting process, which includes a review by LAFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved. Given that the Project Site is located within an urban area, each of the related projects identified in the area would likewise be developed within urbanized locations that fall within an acceptable distance from one or more existing fire stations. The Project would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate. Cumulative increases in demand for fire protection services due to related projects would be identified and addressed through the City's annual programming and budgeting processes. LAFD resource needs would be identified and monies allocated according to the priorities at the time. Any requirement for a new fire station, or the expansion, consolidation, or relocation of an existing fire station would also be identified through this process, the impacts of which would be addressed accordingly. Furthermore, over time, LAFD would continue to monitor population

growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, that may become necessary to achieve the required level of service. LAFD has no known or proposed plans to expand fire facilities or construct new facilities in the Community Plan area.

However, if a new fire station, or the expansion, consolidation, or relocation of an existing station was determined to be warranted by LAFD, the Community Plan area is highly developed, and the site of a fire station would foreseeably be an infill lot less than an acre in size which would meet the requirements for the use of a Class 32 categorical infill exemptions (CEQA Guidelines 15332). Development of a station at this scale is unlikely to result in significant impacts, and projects involving the construction or expansion of a fire station would be addressed independently pursuant to CEQA. With regard to cumulative impacts on fire protection, consistent with City of Hayward v. Board Trustees of California State University (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection and EMS is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. If LAFD determines that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332. Further analysis, including a specific location, would be speculative and beyond the scope of this document. As such, cumulative impacts on fire protection and emergency medical services would be less than significant. Based on the above, the Project's contribution to cumulative impacts to fire protection and EMS would not be cumulatively considerable. As such, cumulative impacts to fire protection and EMS would be less than significant.

(2) Police Services

(a) Construction

Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, when not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Consequently, the Applicant will take precautions to prevent trespassing through construction sites often include temporary fencing around the perimeter of the site. The Project Site is generally open on the alley, Sacramento and Bay streets, The boundaries would need to be secured during construction. Pursuant to Project Design Feature PUB-PDF-1, temporary fencing will be installed to prevent public entry and theft. This would ensure that valuable materials (e.g., building supplies, metals such as copper wiring) and construction equipment are not easily stolen or vandalized. Project construction activities could also potentially impact LAPD services within the Central Area due to construction impacts on the surrounding roadways. Lane closures and construction-related traffic (e.g., truck deliveries and construction worker vehicles) could cause traffic delays and impact police response times in the Project area. Pursuant to TRANS-PDF-1, a Construction Management Plan (CMP) would be implemented during construction of the Project (as required by the City). See Section 4.K, Transportation/Traffic, of the Draft for details of the CMP. The CMP would consider the nature and timing of specific construction activities and other projects in the vicinity, as well as disclose lane closure information, detour plans, truck routes, and staging plans, and identify specific actions that would reduce the effects from construction of the Project on the surrounding community.

In addition, emergency response vehicles can use a variety of options for overcoming traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic pursuant to Section 21806 of the CVC. Based on the above, upon implementation of the Project Design Features and compliance with state law temporary construction activities associated with the Project would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site. In addition, Project construction would not cause a substantial increase in emergency response times as a result of increased traffic congestion. As such, Project construction would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain LAPD's capacity to serve the Project Site. Therefore, impacts on police protection services during Project construction would be less than significant.

Furthermore, consistent with City of Hayward v. Trustees of California State University (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of the Project, and the protection of the public safety is the first responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Thus, the need for additional police protection services is not an environmental impact that CEQA requires the Project Applicant to mitigate.

(b) Operation

The Project would not represent a significant change in the officer-to-resident ratio for the Central Area. Consequently, with an increase for one additional officer to maintain current resident service ratios, the Project would not require the expansion, consolidation, or relocation of the Station. The Project would generate a net increase of employees, as well as an increase in visitors and patrons, especially over the evening and night hours due to the commercial and residential use. As such, the Project could potentially increase the number of police service calls due to an increase in onsite employees and visitors. As indicated in Table IV.J.2-1 of the Draft EIR, the most common crimes in the Newton Area are "Burglary from Vehicles" and "Motor Vehicle Theft." Defensible space, natural surveillance (visibility from streets and sidewalks), and natural access control (landscaping buffers and other distinctions between public and private spaces), would be incorporated into the Project design. The implementation of these design features would reduce the probability of a crime occurring during operation of the Project (see PUB-PDF-2). The Project will include standard security measures such as adequate security lighting, secure access to residential areas, and front desk that offers a visual deterrent and human surveillance feature. Parking would be provided in an enclosed below grade facility as part of the building. LAPD requires that the commanding officer of the Newton Area be provided a diagram of each portion of the property showing access routes, and any additional information that might facilitate police response. This is formally included as PUB-PDF-3.

In addition to the implementation of these project design features, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. Emergency access to the Project Site would be provided by the existing street system.

With regard to Project impacts on police protection, consistent with City of Hayward v. Board Trustees of California State University (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate public safety services, including police protection, is the responsibility of the City. Through the City's regular budgeting efforts, LAPD's resource needs, including staffing and possibly station expansions or new station construction, would be identified and allocated

according to the priorities at the time. Further analysis, including a specific location, would be speculative and beyond the scope of this document. As such, impacts on police protection would be less than significant.

While operation of the Project would increase the number of employees, visitors, and residents in the Project area, the provision of on-site security features, coordination with LAPD, and incorporation of crime prevention features would reduce Project operation impacts to a less-than-significant impact. Operation of the Project would not require the provision of new or physically altered police stations in order to maintain acceptable service ratios or other performance objectives for police protection. Therefore, operation impacts would be less than significant.

(c) Project Design Features

The following Project Design Features are proposed with regard to police protection:

PUB-PDF-1 Prior to the start of construction, temporary fencing will be placed along the periphery of the active construction areas to keep unpermitted persons from entering the construction area and to screen construction activities from view. The perimeter fence will have gates installed to facilitate the ingress and egress of equipment and construction workers. Where applicable, the construction fence would incorporate a pedestrian walkway with temporary lighting. Should sections of the construction fence have to be removed to facilitate work in progress, barriers and or K – rails would be installed to prevent public entry and theft.

PUB-PDF-2 The Project will provide for on-site security measures and controlled access systems for residents and tenants to minimize the demand for police protection services. These measures include, but are not limited to, the following:

- Perimeter lighting to supplement the street lighting and to provide increased visibility and security
- On-site security personnel, commensurate to similar/comparable residential and retail projects of its size, as needed
- Installation of parking garage access control
- Installation of residential units access control

PUB-PDF-3 Prior to the issuance of a certificate of occupancy, the Newton Division commanding officer will be provided with a diagram of each portion of the property. The diagram will include access routes and any additional information that might facilitate police response.

(d) Cumulative

In general, impacts to LAPD services and facilities during the construction of each related project would be addressed as part of each related project's development review process conducted by the City. Similar to the Project, each related project would also be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Similar to the Project, each related project would also be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police

protection services. Furthermore, construction-related traffic generated by the Project and the related projects would not significantly affect LAPD response within the Project Site vicinity as drivers of police vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the Project's contribution to cumulative impacts on either police protection or emergency services during construction would not be cumulatively considerable, and cumulative impacts would be less than significant.

Similar to the Project, related projects would contribute to funding police protection services in the area by generating annual revenue from property taxes that would be deposited into the City's General Fund, which could potentially be used to fund the construction of future police facilities and support hiring more police officers. This would further ensure that the Project's incremental effect on police protection service would not be cumulatively considerable. Through this process, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. On this basis, it is anticipated that potential impacts to police protection would not be cumulatively considerable. Furthermore, the increased demands for additional LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which both the Project and the cumulative projects would contribute. Currently, the LAPD has no known or proposed plans to expand police facilities or construct new facilities within its Newton Area. If a new police station, or the expansion, consolidation, or relocation of an existing station were determined to be warranted by LAPD, the Downtown area is highly developed, and the site of a police station would foreseeably be an infill lot less than an acre in size, which would meet the requirements for the use of a Class 32 categorical infill exemption (CEQA Guidelines 15332). Development of a station at this scale is unlikely to result in significant impacts, and projects involving the construction or expansion of a police station would be addressed independently pursuant to CEQA.

With regard to emergency response, the Project, related projects, and other future development within the Community Plan area would introduce new uses to the Project Site that would generate additional traffic in the vicinity of the Project Site. As discussed above, the Project is not anticipated to substantially affect existing emergency response in the Newton Area, and the Project would not contribute to a cumulative impact regarding response. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel, in accordance with CVC Section 21806. With regard to cumulative impacts on police protection, consistent with City of Hayward v. Board Trustees of California State University (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate public safety services, including police protection, is the responsibility of the City. Through the City's regular budgeting efforts, LAPD's resource needs, including staffing and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. Further analysis, including a specific location, would be speculative and beyond the scope of this document. As such, cumulative impacts on police protection would be less than significant.

Based on the above, the Project's contribution to cumulative operational impacts to police protection services would not be cumulatively considerable. The Project would not result in cumulative adverse impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain LAPD's capability to serve the Project Site. As the Project would not result in a substantial incremental contribution to the cumulative demand for police protection services, the Project's contribution to cumulative impacts on police protection services are less than significant.

(3) Schools

(a) Construction

The Project would generate part-time and full-time jobs associated with construction of the Project between the start of construction and Project buildout. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not anticipated to relocate their households (with student-age children) to the Project area and, thus, would not impact existing school facilities. This is due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. Therefore, the construction employment generated by the Project would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts to school facilities during construction would be less than significant.

(b) Operation

LAUSD provides public elementary, junior high/middle school, and high school education for students living in the City of Los Angeles, including near the vicinity of the Project Site. The Project Site is served by the following LAUSD public schools:

- 9th Street Elementary School (grades K-5), located at 835 Stanford Avenue, approximately 1.0 mile to the west of the Project Site.
- Hollenbeck Middle School (grades 6-8), located at 2510 East 6th Street, approximately 1.0 mile to the east of the Project Site.
- Boyle Heights High School Zone of Choice:
    - Boyle Heights Science Tech Engineering Math High School (grades 9-12), at 456 South Matthews Street, approximately 1.0 mile to the east of the Project Site.
    - Theodore Roosevelt High School (grades 9-12), at 456 South Matthews Street, approximately 1.0 mile to the east of the Project Site.
    - Felicitas and Gonzalo Mendez High School (grades 9-12), at 1200 Plaza Del Sol, approximately 1.1 mile to the north of the Project Site.

The Project is expected to generate approximately 195 students. Although it is possible that some of the school aged residents are currently already attending a LAUSD school near the Project Site, and/or other schools in the vicinity due to the open enrollment policy; to provide a conservative analysis, it is assumed that the total number of students generated by the Project are not currently enrolled in a LAUSD school near the Project Site and would enroll in the LAUSD schools discussed above. The Project buildout year is projected to be in 2022. The District projects student attendance totals for each school in five-year increments. LAUSD does not provide any projections beyond this timeframe. Hollenbeck Middle, and Boyle Heights Zone of Choice High would continue to operate below each school's design capacity by 383 and 661 students, respectively. 9th Street Elementary would experience overcrowding in the future by approximately 37 students. However, pursuant to the California Government Code, the Project Applicant's payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for the Project's direct and indirect impacts to schools.

Pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees is considered full and complete mitigation of Project-related school impacts. Therefore, payment of the applicable development school fees to the LAUSD would offset the potential impact of additional student enrollment at schools serving the Project Site. Accordingly, with adherence to existing regulations, impacts on schools would be less than significant, and mitigation measures would not be required.

(c) Cumulative

LAUSD's facility planning assumptions are based on overall demographic trends, and although not specifically based upon new development projects, are intended to address changes in student enrollment arising from area population trends from various sources, including new development. Implementation of the Project in conjunction with the cumulative development projects would generate students based on an increase in dwelling units and non-residential uses (employees' students). it is estimated that the cumulative growth (Project + related) projects would generate approximately 10,950 students. In addition to the schools identified above that would serve the Project Site and immediate area, the following additional LAUSD schools would serve the related projects:

- Elementary (K-5): 9th, Los Angeles Early Education Center, San Pedro, 2nd, Soto, Garza, Dena, Vernon City;
- Middle Schools (6-8): Hollenbeck, Nava Learning Academy, Utah, Liechty; and
- High Schools (9-12): Metropolitan, Roosevelt, Contreres, Jefferson, Santee.

In addition, students could enroll in a private school, a LAUSD charter or magnet school located in the area, and/or participate in the LAUSD's open enrollment policy. As with the Project, the cumulative projects would be required to pay the appropriate school fees, which would mitigate impacts to public schools. In accordance with CEQA Guidelines section 15130(a)(3), a project's contribution to cumulative impacts is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure designed to alleviate the cumulative impact. Under state law, payment of school fees is deemed to provide full and complete mitigation of school facilities impacts. As the Project would not result in a substantial incremental contribution to the cumulative demand for school services, the Project would not have a cumulatively considerable impact to schools, and cumulative impacts would be less than significant. No mitigation measures are required.

(4) Parks

(a) Adverse Physical Impact

In determining the Project's potential impacts to parks and recreational facilities, this analysis evaluates the potential demand of Project residents for public parks and recreational facilities, as well as the Project's consistency with applicable plans, policies, and regulations related to parks and recreational facilities. As discussed above, due to the amount, variety, and availability of the Project's proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site open space to meet their recreational needs. As such, the Project would meet the applicable requirements set forth in LAMC Section 12.21. Furthermore, in accordance with the regulatory requirements discussed above, the Project would pay a Dwelling Unit Construction Tax in accordance with LAMC Section 21.10.3(a)(1) and comply with the requirements of LAMC Section 17.12 regarding payment of Quimby fees. The Project would not meet the parkland provision goals set forth in the Public Recreation Plan.

However, as previously indicated, these are Citywide goals and are not intended to be requirements for individual development projects. Implementation of regulatory requirements would ensure that the intent of the Public Recreation Plan's parkland standards would be addressed through compliance with applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks. Impacts would be less than significant, and no mitigation measures are required.

(b) Construction

There are no parks or recreational facilities adjacent to or near the Project Site. Therefore, Project construction would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site nor interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project Site vicinity. Project construction would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services Project construction would not 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. Therefore, impacts on parks and recreational facilities during Project construction would be less than significant, and mitigation measures would not be required.

(c) Operation

Due to the amount, variety, and availability of the proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site open space to meet their recreational needs. Thus, while the Project's new residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Similarly, the Project's commercial component could result in a demand for parks and recreational facilities. However, it is anticipated that Project employees would also primarily utilize on-site open space during their time spent at the Project, resulting in a negligible demand for surrounding parks and recreational facilities. Furthermore, the Project would pay in-lieu parkland fees in accordance with Sections 17.12 and 12.33 of the LAMC. Therefore, the Project would not substantially increase the demand for off-site public parks and recreational facilities. Project operation would not 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. Therefore, impacts on parks and recreational facilities during Project operation would be less than significant, and mitigation measures would not be required.

(d) Cumulative

All identified related projects and ambient growth projections fall within a 2-mile radius of the Project Site, which is the geographic area analyzed for purposes of assessing impacts to parks and recreational facilities. As noted above, the Community Plan area is currently underserved when considering the desired parkland standards provided in the Public Recreation Plan. As the population continues to grow in the Project Site vicinity, increased demand would lower the existing parkland to population ratio without the construction of new parkland, such as the anticipated 1st and Broadway Park (in the planning stages with no estimated year of completion). Depending on their location, the related projects could be served by the parks and recreation facilities that would also serve the Project, as well as other LADRP facilities, including

- 6th and Gladys Park
- Aliso Pico Recreation Center, 370 S. Clarence Street
- Central Recreation Center, 1357 E. 22nd Street
- Pershing Square Park, 532 S. Olive Street
- City Hall Park, 200 N. Main Street
- Pecan Recreation Center, 127 S. Pecan Street
- Spring Street Park, 428 Spring Street

While it is anticipated that the Project's provision of on-site open space would meet the recreational needs of Project residents, the Project would not meet all of the parkland provision goals set forth in the Public Recreation Plan. Development of the related projects would exacerbate the Community Plan area's deficiency in parkland per the Public Recreation Plan's standards. The 1st and Broadway Park (in the planning stages with no estimated year of completion), however, would make a substantial positive contribution toward meeting these goals. However, as previously indicated, the standards set forth in the Public Recreation Plan are Citywide goals and are not intended to be requirements for individual development projects. Furthermore, as with the Project, the related projects would undergo discretionary review on a case-by-case basis and would be expected to coordinate with the DRP. Future development projects would also be required to comply with the park and recreation requirements of Sections 12.21, 17.12, 12.33, and 21.10.3(a)(1) of the LAMC and the Park Fee Ordinance, as applicable. As such, cumulative impacts to parks and recreational facilities would be less than significant.

(5) Libraries

(a) Construction

Construction of the Project would result in a temporary increase of construction workers on the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, Project-related construction workers would not result in a notable increase in the resident population within the service area of the libraries in the vicinity of the Project Site. Furthermore, construction workers would not result in a notable increase in an overall corresponding demand for library services in the vicinity of the Project Site. It is unlikely that construction workers would utilize Project area libraries on their way to/from work or during their lunch hours. Construction workers would likely utilize library facilities near their places of residence because lunch break times are typically not long enough for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service.

Similarly, it is unlikely that construction workers would utilize library facilities at the end of the workday and would likely use library facilities near their places of residence. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, construction of the Project would not exceed the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the Los Angeles Public Library (LAPL). Project construction would not substantially increase the demand for library services for which current demand exceeds the ability of the facility to

adequately serve the population. As such, Project construction would not result in the need for new or physically altered libraries, the construction of which would cause significant environmental impacts. Impacts on library facilities during Project construction would be less than significant, and no mitigation measures are required.

(b) Operation

The Central Library is not only a resource for the local population, but it is also a destination for regional, domestic, and international patrons. While the 2007 Branch Facilities Plan recommends the addition of a second branch for communities with populations above 90,000 persons, as previously described, there are three other branch libraries within a two-mile radius of the Project Site. Therefore, the Central Library is sufficient when considered with the other three identified libraries. Chinatown branch currently meet the recommended building size standards. With the addition of the Project's 268 estimated new residents, the library would continue to meet the recommended building size standards under existing and future conditions. However, Franklin and Little Tokyo branches currently do not meet the recommended building size standards under existing conditions. With the addition of the Project's 268 estimated new residents, the libraries would continue their operations without meeting the recommended building size standards without or with the Project under existing and future conditions.

The L.A. CEQA Thresholds Guide considers features (on-site library facilities, direct support to LAPL) that would reduce the demand for library services. It is likely that the residents of the Project would have individual access to internet service, which provides information and research capabilities that studies have shown reduce demand at physical library location. Further, Measure L has provided funds to restore adequate services to the existing library system. The Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, and business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project area, as deemed appropriate. The Project's revenue to the General Fund would help offset the Project-related increase in demand for library services. As such, the Project would not conflict with or impede implementation of the applicable policies and goals related to libraries in the Framework Element or the Community Plan.

With regard to the potential for the employees to use nearby library facilities, the Project would include a range of full-time and part-time positions that would be primarily filled by persons who already reside in the vicinity of the workplace and already generate a demand for the libraries in the Project Site's vicinity. Furthermore, employees at the Project Site would have internet access, which provides information, research capabilities, and a reduced demand at physical library locations. As such, any indirect or direct new demand for library services generated by employees would be negligible.

Based on Table IV.J.5-3 in the Draft EIR, the Project would not create any new exceedance of the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the LAPL. Therefore, the Project would not result in the need for new or altered facilities, or substantially increase the demand for library services for which current and future demand exceeds the ability of the facility to adequately serve the population. In addition, although the Little Tokyo and Franklin branches would continue operations without meeting recommended building standards under existing and future conditions, residents of the Project could also visit the Central Library, which is nearby. To the extent that Project residents would travel farther within the 2-mile libraries service area, library usage would be expected to be dispersed between the Central Library and the other three local branch libraries identified by the LAPL. Furthermore, as the Franklin and Little Tokyo branches are already undersized in existing conditions, the Project would not be anticipated to result in a substantial increase in demand for library services for which current demand exceeds the ability

of the libraries to adequately serve the population. Therefore, the Project would not result in the need for new or altered facilities, the construction of which would cause significant environmental impacts. As such, impacts on library facilities during operation of the Project would be less than significant. Nonetheless, the LAPL has recommended a fee of $200 per capita based upon the projected population of the Project, which would be applied towards staff, books, computers, and other library materials. This would be applied as a Condition of Approval on the Project.

(c) Cumulative

Pursuant to the library sizing standards recommended in the 2007 Branch Facilities Plan, the cumulative future service population of the Central Library would warrant the addition of a new branch library since the service population would exceed 90,000 persons. The Central Library is sufficient when considered with the other three identified libraries. Chinatown branch currently meet the recommended building size standards. With the addition of the cumulative growth, the library would continue to meet the recommended building size standards under existing and future conditions. However, Franklin and Little Tokyo branches currently do not meet the recommended building size standards under existing conditions. With the addition of the cumulative growth, the libraries would continue their operations without meeting the recommended building size standards without or with the Project under existing and future conditions.

However, this estimate is likely overstated as it does not consider that much of the growth associated with the Project and related projects is already accounted for in the service population projections made by the LAPL based on SCAG projections. In addition the estimate is conservative considering that all four libraries would provide library services to the 38,832 new residents generated by the Project and the related projects, and not all the residents would utilize the four libraries equally. Therefore, these residents would be more likely to utilize libraries closer in proximity as their primary libraries. In addition, the estimate of the cumulative service population is largely driven by the number of related projects in the Project area.

Depending on their location, the related projects in the City of Los Angeles would be served by the Central Library and three branch libraries that would also serve the Project. In addition, some of the related projects would be served by the following other LAPL branches:

Vernon-Washington Branch, 4504 S. Central Avenue

Stevenson Branch, 803 Spence Street

Furthermore, similar to the Project, each related project, and other future development in the Community Plan area would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project area, as deemed appropriate. These revenues to the General Fund would help offset the increase in demand for library services as a result of the Project and the related projects.

Based on Table IV.J.5-4 of the Draft EIR, the cumulative growth would not create any new exceedance of the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the LAPL. Therefore, the cumulative growth would not result in the need for new or altered facilities, or substantially increase the demand for library services for which current and future demand exceeds the ability of the facility to adequately serve the population. In addition, although the Little Tokyo and Franklin branches would continue operations without meeting recommended building standards under existing and future conditions, residents of the related projects could also visit the Central

Library, which is nearby. To the extent that residents would travel farther within the 2-mile libraries service area, library usage would be expected to be dispersed between the Central Library and the other three local branch libraries identified by the LAPL. Furthermore, as the Franklin and Little Tokyo branches are already undersized in existing conditions, the cumulative growth would not be anticipated to result in a substantial increase in demand for library services for which current demand exceeds the ability of the libraries to adequately serve the population. Therefore, the related projects would not result in the need for new or altered facilities, the construction of which would cause significant environmental impacts. As such, cumulative impacts on library facilities during operation would be less than significant.

i) Transportation and Traffic

(1) Construction

During construction, adequate parking for construction workers would be secured in local public parking facilities or, if needed, a remote site with shuttle service provided. Restrictions against workers parking in the public right-of-way in the vicinity of (or adjacent to) the Project Site would be identified as part of the Construction Management Plan (Project Design Feature TRANSPDF-1). All construction materials storage and truck staging would be contained on-site. Therefore, impacts during construction would be less than significant. The sidewalks fronting the Project Site may require temporary closures for equipment staging. Project construction is not expected to create hazards for roadway travelers, bus riders, or parkers, as long as commonly practiced safety procedures for construction are followed. Such procedures and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, relocation of bus stops, etc.) would be incorporated into the Construction Management Plan (Project Design Feature TRANS-PDF-1). Therefore, impacts during construction to access, transit and parking would be less than significant.

(2) Congestion Management Program (CMP)

Based on a review of the Project trip generation and the Project trip distribution patterns, the Project is expected to contribute minimal traffic volumes to these CMP monitoring intersections during the weekday AM and PM peak hours (16 or fewer trips at each intersection, during each peak hour). Further, it is expected that Project traffic volume contributions to more distant CMP arterial monitoring locations would be even lower, given that Project traffic would disperse across an increasing number of roadways when farther from the Project site. With Project traffic contributions well below the 50-trip threshold, no significant Project impacts to CMP arterial monitoring locations would occur and no additional arterial intersection analysis is necessary.

Beyond the requirements of the local CMP, a Caltrans freeway impact analysis screening was performed for the Project as part of the approved MOU, per the criteria set forth in the October 2013 Agreement Between City of Los Angeles and Caltrans District 7 on Freeway Impact Analysis Procedures (the "Agreement") and the December 2015 First Amendment to the Agreement between LADOT and Caltrans District 7 on Freeway Impact Analysis Procedures (the "Amendment"). Project traffic volume contributions to the freeway mainline and off-ramp locations most likely to be impacted by Project-related traffic were analyzed. The impact analysis screening included performing Highway Capacity Manual (HCM) operational analyses for four freeway off ramp locations. These freeway off ramp locations included the I-10 Freeway eastbound off-ramp to San Pedro Street, the I-10 Freeway eastbound off-ramp to Porter Street (Santa Fe Avenue), the US-101 Freeway southbound off-ramp to 7th Street, and the I-5 Freeway northbound off-ramp to 7th Street. None of the Project traffic volume contributions to freeway mainline and off-ramp locations met the thresholds requiring additional analysis. Therefore, the Project's CMP mainline freeway impacts would be less than significant and no further analysis is required.

(3) Site Access and Circulation

Project parking would be provided on-site in three subterranean garage floors. Primary residential and commercial access/egress would be via a driveway intersecting the north side of Sacramento Street near the southeast corner of the Project site. A secondary, egress-only driveway would intersect the south side of Bay Street near the northeast corner of the Project Site. The Project would comply with the conditions contained within the Transportation Study Assessment for the Project. The vehicular access system is adequate to serve the Site and no points of congestion are anticipated that would affect traffic flow on the adjacent public streets. The conceptual site plan is acceptable to LADOT. Approval of the driveway dimensions, access and circulation scheme require separate review and approval from LADOT. Therefore, impacts would be less than significant.

With respect to operation, emergency vehicle access to the Project Site is provided via local roadways. The Project's design would be required to comply with Department of Building and Safety and Los Angeles Fire Department's (LAFD) access requirements. The LAFD's ability to provide adequate fire protection and emergency response services to a site is also determined by the degree to which emergency response vehicles can successfully navigate the given access ways and adjunct circulation system along the response route. Operational impacts on emergency access would be less than significant.

(4) Transit, Bicycle, and Pedestrian Facilities

The Project trip generation reflects a transit adjustment of 10 percent for all land uses, which amounts to 364 net vehicles reduced by transit per day, with 30 AM peak-hour and 40 PM peak-hour trips reduced. Per the 2010 CMP guidelines, person transit trips can be estimated by multiplying the transit vehicle trip reductions by a conversion factor of 1.4. Therefore, the number of net Project person transit trips would be approximately 510 daily person transit trips, with 42 AM peak-hour and 56 PM peak-hour person transit trips. Based on recent ridership information provided by Metro, all three of the bus lines operating in the Project study area experience ridership levels below capacity during the AM and PM peak hours. With Metro operating three different bus routes within a convenient walking distance of the Project site, with most peak-hour headways of 15 minutes or less, the local transit system offers available ridership capacity. Therefore, the incremental additions of Project person transit trips would not have a significant impact on transit service in the study area.

There are no bike lanes on Sacramento Street or Bay Street. In order to facilitate bicycle use, bicycle parking spaces would be provided on-site, No bicycle lane facilities are planned along Sacramento Street or Bay Street, consistent with the Bicycle Parking Ordinance, LAMC Section 12.21 A16(a)(2). The Project would also embrace the objectives of the City of Los Angeles Mobility Plan 2035, which includes the goals and policies of the City of Los Angeles 2010 Bicycle Plan. The Mobility Plan 2035 aims to complete its proposed paths, protected cycle tracks, bicycle lanes, routes, and priority Neighborhood Enhanced Network roadway segments by 2035. The Project would not impede the Mobility Plan 2035 improvements which have already been realized, and the Project would support the implementation of future improvements. The Project Site has been designed with consideration for the roadway and right-of-way dimensions for Bay Street and Sacramento Street, per the Mobility Plan 2035. Therefore, impacts to bicycle facilities would be less than significant.

Project Design Feature TRANS-PDF-2 would provide adequate protections during construction to existing pedestrian facilities such as sidewalks around the Site. Development projects proposed on a roadway identified as part of the City's High Injury Network (HIN) should be designed to enhance safety. Although the Project is not located within the HIN, the Project would take measures to align with the City's Vision Zero Los Angeles Initiative. Vision Zero was

launched by Executive Order Number 10 in August 2015 with the goals of reducing traffic fatalities by 20 percent by 2017 and eliminating all traffic fatalities citywide by 2025. Vision Zero specifically seeks to implement traffic safety treatments at intersections and along roadway segments to improve safety for pedestrians, bicyclists, and other vulnerable road users. The Project driveways have been located at the eastern edge of the Project site on Bay Street and Sacramento Street, away from pedestrian walkways, thus enhancing walkability and connectivity. Further, the Project will feature open-to-the-sky pedestrian paseos that cross the site, create comfort for passing pedestrians, and activate the block as a pedestrian-safe environment. The Project access locations would be designed to provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. All roadways and driveways intersect at right angles and street trees and other potential impediments to adequate driver and pedestrian visibility would be minimal. Therefore, impacts to pedestrian facilities would be less than significant.

(5) Project Design Features

The following Project Design Features (PDFs) are proposed with regard to transportation and traffic:

TRANS-PDF-1 Construction Management Plan

The Project Applicant would prepare and submit a Construction Management Plan, including street closure information, detour plans, truck routes, and staging plans, to LADOT for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan would be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and would include, but not be limited to, the following measures:

- Prohibition of construction worker, equipment or construction-related vehicle parking on adjacent streets.
- Prohibition of construction equipment or material deliveries within the public right-of-way unless specified in the Construction Management Plan.
- Provisions for temporary traffic control during all construction activities adjacent to public right-of-way to improve traffic flow on public roadways (e.g., flag person).
- Provisions of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate.
- Provisions to accommodate the equipment storage and truck staging on-site whenever possible to avoid surrounding streets.
- Scheduling of construction-related deliveries, haul trips, etc., during off-peak hours to the extent feasible.
- Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the Project Site and impact roadway traffic, and if needed, utilize an organized onsite staging area.
- Obtaining all required approvals for truck haul routes from the City prior to issuance of any permit for the Project.

TRANS-PDF-2 Pedestrian Facilities - Construction

- The Project Applicant would maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the Project 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.
- The Project Applicant would provide temporary pedestrian facilities adjacent to the project site and would provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- The Project Applicant would provide covered walkways where pedestrians are exposed to potential injury from falling objects.
- The Project Applicant would keep sidewalks open during construction until only when it is absolutely required to close or block sidewalk for reasonable construction staging or safety. Where such closures are necessary, the Project's Construction Management Plan will identify the location of any sidewalk and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of the closure. Sidewalk would be reopened as soon as reasonably feasible taking construction and construction staging into account.

j) Tribal Cultural Resources

(1) Substantial Adverse Change

The California Historical Resources Information System (CHRIS) search did not identify any previously recorded tribal cultural resources within the Project site. The Native American Heritage Commission (NAHC)'s search of the Sacred Lands File (SLF) search did not identify any sacred lands or sites. Pursuant to Assembly Bill (AB) 52, the Department of City Planning (DCP) mailed notification letters to 10 tribal parties by March 2, 2017. No requests for consultation were received within the 30-day response period. Therefore, SWCA (consultant that prepared the Draft EIR's tribal cultural resource assessment) finds the Project would not adversely affect known tribal cultural resources.

The potential for unidentified tribal cultural resources within the Project site was assessed and found to be moderate, with the highest potential between 0.9 and 1.5 m (3 and 15 feet) below the present grade. Specifically, there is a likelihood that material remains from a Native American open camp are present in the Project site, which includes but is not limited to flaked stone tools, tool-making debris, stone milling tools, ceramics, modified shell, animal remains, and hearth features (e.g., sediment discoloration or carbonization, charcoal deposits, and fire-altered rock). These artifacts and features are subtle in nature and unlikely to be identified without training. The Project is also subject to Project Design Features TRIBAL-PDF-1 and TRIBAL-PDF-2, which requires retaining an archaeologist and conducting a WEAP training to ensure that construction workers are provided instruction on the types of tribal cultural resource that could be encountered and ensure that any such resources are properly identified and preserved. The City has established a standard condition of approval to address inadvertent discovery of tribal cultural resources, which provides for the temporary halting of construction, Native American tribal notification protocol, and assessment by a qualified archaeologist. Based on the City's standard condition of approval, as implemented according to TRIBAL-PDF-1 and TRIBAL-PDF-2 incorporated into the Project, any potential impacts to tribal cultural resources would be reduced to less than significant levels.

(2) Project Design Features

As a means of fulfilling the City's condition of approval, the following project design features (PDFs) have been incorporated into the Project that will be implemented by the Project applicant:

TRIBAL-PDF-1 Retain a Qualified Archaeologist

In the event of an inadvertent discovery, the Project applicant shall retain a qualified archaeologist (Project archaeologist), defined as an archaeologist who meets the Secretary of the Interior's Standards for professional archaeology, during the demolition and excavation phase to carry out the Condition of Approval of the Inadvertent Discovery of Tribal Cultural Resources.

TRIBAL-PDF-2 Worker Environmental Awareness Program (WEAP)

Before demolition, excavation or any other ground-disturbing activities, at the project kickoff, the selected Project archaeologist or their designee will provide a WEAP training to construction crews that provides information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should unanticipated tribal cultural resources discoveries be made during construction. In addition, workers will be shown examples of the types of resources that would require notification of the Project archaeologist.

(3) Cumulative

Although impacts to Tribal cultural resources tend to be site-specific, cumulative impacts would occur if the Project, related projects, and other future development within the Community Plan area affected the same Tribal cultural resources and communities. The Project and the related projects are located within an urbanized area that has been disturbed and developed over time. Although impacts to Tribal cultural resources tend to be site-specific, cumulative impacts would occur if the Project, related projects, and other future development within the Community Plan area affected the same Tribal Cultural resources and communities. As discussed above, there are no Tribal cultural resources located on the Project Site and all Project development would remain onsite. However, the Project would address any inadvertent discovery of Tribal cultural resources by adhering to the City's condition of approval and mitigation measures, as discussed above. In addition, in the event that Tribal cultural resources are uncovered, each related project and other future development would be required to comply with the regulatory requirements, as discussed in detail above, and with the City's condition of approval. Furthermore, related projects would also be required to comply with consultation requirements of AB 52 to determine and mitigate any potential impacts to tribal cultural resources. Therefore, cumulative impacts to Tribal cultural resources would be less than significant and would not be cumulative considerable.

k) Utilities and Service Systems

(1) Wastewater

(a) Construction

Construction activities for the Project would not result in wastewater generation as construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities is not anticipated to cause a measurable increase in wastewater flows. Construction

activities associated with upsizing and/or connection to existing lines would not result in significant impacts, as the construction activities would be temporary. With Project Design Feature TRANS-PDF-1, a Construction Management Plan (CMP) would be implemented during construction of the Project. See Section IV.K, Transportation/Traffic, of the Draft EIR for details of the CMP. The CMP would consider the nature and timing of specific construction activities and other projects in the vicinity, as well as disclose lane closure information, detour plans, truck routes, and staging plans, and identify specific actions that would reduce the effects from construction of the Project on the surrounding community to ensure safe pedestrian access and vehicle travel and emergency vehicle access throughout the construction phase. Therefore, construction related impacts to the existing wastewater infrastructure and facilities would be less than significant.

(b) Operation

The Project Site is served by an existing wastewater conveyance system. The amount of wastewater flow generated during operation of the Project would be similar to other uses in the area. The Project would generate a total of approximately 30,426 gallons per day (gpd) (or 0.030 mgd) of wastewater. This total represents a conservative result since it does not take any credit for the proposed sustainable and water conservation features of the Project. The 0.030 mgd net increase in wastewater over the existing Project Site conditions represents approximately 0.02 percent of the remaining capacity HTP system. Further, BOS would be required to confirm that the HTP and local trunk lines have sufficient capacity to accommodate the Project's projected wastewater flows. If the surrounding sewer lines' capacity is determined to be insufficient, the Project Applicant would be required to construct and finance the necessary improvements to convey the wastewater to a point with sufficient capacity. In addition, the Project Applicant would also be responsible for any necessary sewer connection fees. After completion of the required improvements, a final approval of the sewer capacity would be provided, as well as a connection permit. Further, the City's implementation of the Sewer Allocation Ordinance (City Ordinance No. Ordinance No. 166060) assures that sufficient capacity is available at the HTP at the time a building permit is issued by the City. Therefore, the HTP has enough remaining capacity to accommodate the Project. The increase caused by the Project represents approximately 1 percent of the annual sewage allotment of 5.0 mgd for both priority and non-priority projects.

As the HTP is required to adhere to the LARWQCB wastewater regulations, no impacts with regard to operation of the Project and wastewater treatment requirements would occur. Wastewater generated during the Project's construction period would not result in significant impacts to the existing wastewater infrastructure and/or facilities, and would comply with the existing federal, state, and local regulations applicable to wastewater. Implementation of the Project would increase the amount of wastewater flow generated on the Project Site (during operation), as compared to existing conditions. However, as discussed above the Project Applicant would be required to confirm that the HTP and existing sewer system have the capacity to accommodate the projected increase in wastewater flow. Further detailed gauging and evaluation is required as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity, then the Project Applicant shall be required to build improvements to convey wastewater to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit would be made at that time. The Project would not result in the potential expansion of existing facilities, the construction of which could cause significant environmental effects or 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 amendments. The Project's wastewater flow would not exceed wastewater treatment requirements of the LARWQCB. Thus, impacts with regards to wastewater generation and infrastructure capacity would be less than significant.

(c) Cumulative

Construction activities associated with upsizing and/or connection to existing lines would not result in significant impacts, as the cumulative construction activities would be temporary. Related projects would not significantly impact traffic or emergency access, as required by the City, LAPD, and LAFD. Similar to the Project, cumulative construction related impacts to the existing wastewater infrastructure and facilities would be less than significant. The related projects, in combination with the Project would generate approximately 3.09 mgd of wastewater, with the Project accounting for approximately 4 percent of the projected increase in wastewater generation. Wastewater generated by the related projects would be treated at the HTP. The total wastewater flow would be within the design capacity of the HTP, representing about 1.8 percent of the remaining capacity. As such, the Project's incremental effect on cumulative impacts to wastewater treatment capacity would not be cumulatively considerable and cumulative wastewater impacts would be less than significant.

In addition, increased wastewater flows to the HTP are addressed in the Integrated Resources Plan (IRP), which includes a plan to ensure that existing wastewater processing facilities are sufficient to handle projected flows through 2020 of the expected 18.7 percent population growth for the City. The environmental impacts of potentially expanding the existing facilities have already been analyzed in the Draft and Final EIRs prepared and certified for the Integrated Resources Plan. In June 2012, LABS and the LADWP issued the Water Integrated Resources Plan Five Year Review, which identified that actual average wastewater flows to the HTP in 2010 were approximately 26.5 percent below projections based upon 2008 demographic data from SCAG.27 Accordingly, the requirement for physical expansions of the HTP to address increased flows that are included in the IRP have not been triggered and it would appear likely that the requirements set forth in the IRP will remain valid beyond the 2020 horizon year of the IRP. In addition, the City is currently engaged in a comprehensive update to the IRP (One Water LA) that will identify water and wastewater needs for the City through 2040. As with the Project, related projects would be required to coordinate with LASAN via a sewer capacity availability request to determine adequate sewer capacity. In addition, related projects would also be subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. In order to connect to the sewer system, related projects in the City of Los Angeles would also be subject to payment of the City's Sewerage Facilities Charge. Payment of such fees would help to offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater generated by overall future growth. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related project and LASAN to construct the necessary improvements. Furthermore, similar to the Project, each related project would be required to comply with applicable water conservation programs, including the City of Los Angeles Green Building Code. Therefore, Project impacts on the City's wastewater infrastructure would not be cumulatively considerable, and cumulative impacts would be less than significant.

(2) Water

(a) Construction

Construction activities for the Project would result in a temporary demand for water associated with soil compaction and earthwork, dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. These activities would occur incrementally throughout construction of the Project (from the start of construction to project buildout). The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed.

Given the temporary nature of construction activities, the short-term and intermittent water use during construction of the Project would be significantly less than the net new water consumption at Project buildout. Water for construction activities would be conveyed using the existing water infrastructure at the Project Site. No infrastructure improvements would be needed to provide water during the construction of the Project. Furthermore, as concluded in LADWP's 2015 UWMP, projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year in each year from 2015 through 2040. Therefore, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of project construction.

Based on the above, project construction activities would result in a limited, temporary demand for water and are not anticipated to have a substantial adverse impact on available water supplies. Therefore, the City would have sufficient water supply available to adequately serve the Project during construction. As such, construction-related impacts to water supply would be less than significant.

(b) Operation

Operation of the Project would require 30,426 net gallons of water per day (gpd) (or 0.030 million gallons per day (mgd)). The LAAFP currently has the capacity to treat and convey an additional 50 to 150 mgd of water, depending on the season (summer and winter). The Project's net increase represents approximately 0.01 percent of the LAAFP available capacity during the more constrained summer months, and would be accommodated within the LAAFP's existing treatment capacity. As the Project's water demand is accounted for in the City's future projected demands (the 2012 RTP includes growth throughout the Los Angeles subregion, and informs the LADWP 2015 UWMP; the 2016 RTP was released after the 2015 UWMP), and the existing capacity of the LAAFP would be adequate to accommodate the Project's water demands, the Project would not require the construction or expansion of new water treatment facilities that could cause a significant environmental effect. In general, projects that conform to SCAG's RTP demographic projections and are in the City's service area, are considered to have been included in LADWP's water supply planning efforts in the UWMP. Therefore projected water supplies would meet projected demands.

The LADWP (through its 2015 UWMP) anticipates its projected water supplies will meet demand through the year 2040, including anticipated growth projections and demographic changes. In terms of the City's overall water supply condition, the water requirement for any project that is consistent with the City's General Plan has been taken into account in the planned growth of the water system. In addition, any project that conforms to the demographic projections from SCAG's RTP and is located in the service area, is considered to have been included in LADWP's water supply planning efforts, and therefore, projected water supplies would meet projected demands. The 2015 UWMP is based on projections from SCAG's 2012 RTP, which provided projections through 2035. The 2016 RTP provides projects through 2040.

The estimated water demand for the Project would not exceed the available supplies projected by LADWP. Thus, LADWP would be able to meet the water demand of the Project, as well as the existing and planned future water demands of its service area. Therefore, the Project's operation-related impacts on water supply would be less than significant.

Based on the above, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site and would have sufficient water supplies available to serve the Project from existing entitlements and resources. Therefore, the Project's impacts on water supply would be less than significant.

(c) Cumulative

Related projects, similar to the Project, would involve construction activities requiring water (e.g., soil watering for fugitive dust control, clean up, masonry, painting, etc.), which would be short term and temporary in nature. Thus, construction activities would require minimal water consumption and would not be expected to have an adverse impact on available water supplies or existing water distribution systems. Related projects will establish whether construction water demand can be met on a project-by-project basis, with regard to days of excavation and grading and the amount of fugitive dust control water is needed. The Project would not be cumulatively considerable with regard to construction water demand.

The Project in conjunction with the related projects would yield a cumulative average water demand of approximately 3,085,656 gpd, with the Project accounting for approximately 3.5 percent of the projected increase in water demand. The remaining daily capacity of the LAAFP is 50 to 150 mgd of water, depending on the season. The total cumulative water demand (related projects + Project) would represent approximately 6 percent of the total remaining daily capacity during the more constrained summer months. Therefore, the LAAFP would have adequate capacity to treat the water demanded by the Project and related projects.

For projects that meet the requirements established pursuant SB 610, SB 221, and Sections 10910-10915 of the State Water Code, a WSA demonstrating sufficient water availability is required on a project-by-project basis. Similar to the Project, each related project would be required to comply with City and State Water Code and conservation programs for both water supply and infrastructure.

In addition, the potential need for the related projects to upgrade water lines to accommodate their water needs is site-specific and there is little, if any, relationship between the development of the Project and the related projects in relation to this issue. Therefore, no cumulative water infrastructure impacts or water treatment facilities impacts are anticipated from the development of the Project and the related projects. Future development projects within the service area of the LADWP would be subject to the locally mandated water conservation programs. Citywide water conservation efforts would also be expected to partially offset the cumulative demand for water. The LADWP undertakes expansion or modification of water service infrastructure to serve future growth in the City as required in the normal process of providing water service. Each related project will be evaluated on a case by case basis and required to comply with state and city regulations.

Based on the related project list and projections provided in adopted plans (e.g., MWD's 2015 UWMP, LADWP's 2015 UWMP, and Sustainable City pLan), it is anticipated that LADWP would be able to meet the net water demands of the Project (30,426 gpd or approximately 34.1 AFY) and future growth through 2022 and beyond. The 2015 UWMP forecasts adequate water supplies to meet all projected water demands in the City through the year 2040. Therefore, cumulative significant impacts with respect to water supply are not anticipated from the development of the Project and the related projects. Project impacts to water supply would not be cumulatively considerable, and would be less than significant.

(3) Solid Waste

(a) Construction

The Project would dispose of approximately 157 tons of construction-related waste in the County's inert landfill throughout the construction period. This amount of construction and debris waste would represent approximately 0.0003 percent of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 56.34 million tons. Thus, the total amount of construction

and demolition waste generated by the Project would represent a fraction of the remaining capacity at the unclassified landfill serving Los Angeles County. Since the County's unclassified landfill generally does not face capacity shortages, and the County's unclassified landfill would be able to accommodate Project-generated waste, construction of the Project would not result in the need for an additional disposal facility to adequately handle Project-generated construction-related waste. Therefore, construction impacts to solid waste facilities would be less than significant.

(b) Operation

It is estimated that the Project would generate a net total of approximately 4.43 tpd (1,617 tons per year) of solid waste. This total represents a conservative estimate and does not account for any recycling efforts, which the Project would be required to implement. Assuming a 76 percent recycling rate (consistent with the amount of waste diverted in the City in 2015) the Project would generate a total of 388 tons per year of solid waste. The net increase in solid waste disposal associated with the Project would represent an approximate 0.01 percent increase in the City's annual solid waste disposal quantity, based on the 2017 disposal of approximately 3.2 million tons. Project-generated solid waste would be collected by a private solid waste hauler and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. The estimated remaining capacity for the County's Class III landfills open to the City of Los Angeles is approximately 78.71 million tons. Thus, the Project's net increase of 388 tons of annual solid waste disposal would represent approximately 0.0005 percent of the estimated remaining Class III landfill capacity available to the City of Los Angeles. Thus, based on the amount of solid waste to be generated by the Project, the waste reduction measures that would be implemented, and the existing capacity of Los Angeles County landfills, impacts associated with solid waste disposal would be less than significant.

(c) Cumulative

The related projects in combination with the Project would generate approximately 203.5 tons per day (74,277.5 tons per year) of operation solid waste, with the Project accounting for approximately 3 percent of that projected increase. Assuming a 76 percent recycling rate (consistent with the amount of waste diverted in the City in 2015), the cumulative total would generate a total of 17,826.6 tons per year of solid waste. The net increase in solid waste disposal associated would represent an approximate 0.56 percent increase in the City's annual solid waste disposal quantity, based on the 2017 disposal of approximately 3.2 million tons. Solid waste would be collected by a private solid waste hauler and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. The estimated remaining capacity for the County's Class III landfills open to the City of Los Angeles is approximately 78.71 million tons. Thus, the net increase would represent approximately 0.02 percent of the estimated remaining Class III landfill capacity available to the City of Los Angeles. The Project's contribution to the County's estimated cumulative waste stream would not be cumulatively considerable.

(4) Energy Conservation

(a) Construction

Approximately 9,098 kWh of electricity, 174,359 gallons of gasoline, and 137,482 gallons of diesel are estimated to be consumed during Project construction. Project construction is expected to be completed by 2022. A total of approximately 9,098 kWh of electricity is anticipated to be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric

equipment would be powered off so as to avoid unnecessary energy consumption. The estimated construction electricity usage represents approximately 0.10 percent of the estimated net annual operational demand which would be within the supply and infrastructure service capabilities of LADWP. Therefore, electricity impacts during construction would be less than significant. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would likely not be needed to support Project construction activities; thus there would be no demand generated by construction. On- and off-road vehicles would consume an estimated 174,359 gallons of gasoline and approximately 137,482 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.004 percent of the 2017 annual on-road gasoline-related energy consumption (4,294,811,614 gallons) and 0.02 percent of the 2017 annual diesel fuel-related energy consumption (607,534,327 gallons) in Los Angeles County. Therefore, transportation impacts during construction would be less than significant.

(b) Operation

The Project's net new energy demand would be approximately 3,717 MWh of electricity per year, 2,195,971 cf (2,277,221 kbtu/yr, assuming 1 cubic feet = 1.037 kBTU of natural gas per year, 408,382 gallons of gasoline per year, and 102,065 gallons of diesel fuel per year. Based on LADWP's 2016 Power Integrated Resource Plan, LADWP forecasts that its total energy sales in 2022-2023 fiscal year (the Project's buildout year) will be 24,165 Gwh of electricity. As such, the Project-related net increase in annual electricity consumption of 3.78 gWh per year would represent approximately 0.015 percent of LADWP's projected sales in 2022. In addition, as previously described, the Project would incorporate a variety of energy conservation measures to reduce energy usage.

The Project's estimated increase in demand for natural has is 2,195,971 cf per year, or approximately 6,016 cf per day. Based on the 2016 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2,456 million cf per day in 2025 (the Project's the closest subsequent year to the Project's buildout year). The Project would account for approximately 0.0002 percent of the 2025 forecasted consumption in SoCalGas's planning area. In addition, as previously described, the Project would incorporate a variety of energy conservation measures to reduce energy usage.

During operation, much of the fuel consumption resulting from the Project would involve the use of motor vehicles traveling to and from the Project Site, as well as fuels used for alternative modes of transportation that may be used by residents, employees, visitors, and guests of the Project. Petroleum fuel consumption associated with motor vehicles traveling to and from the Project Site is a function of the VMT as a result of Project operation. The annual VMT attributable to the Project is expected to be 8,392,021 VMT. Assuming a fleet mix of 91 percent auto and 9 percent other types of vehicles with a lower mpg), the Project would consume 510,447 gallons of petroleum (gas and diesel) per year of operation for vehicular trips to and from the Project.

(c) Cumulative

Buildout of the Project, related projects, and additional forecasted growth in LADWP's service area would cumulatively increase the demand for electricity supplies and infrastructure capacity. LADWP forecasts that its total energy sales in the 2022 fiscal year (the Project occupancy year) will be 24,165 GWh of electricity. Based on the Project's estimated net new electrical consumption of 3,717 MWh per year, the Project would account for approximately 0.015 percent of LADWP's projected sales for the Project's occupancy year. Although Project development

would result in the use of renewable and non-renewable electricity resources during construction and operation, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures making the Project more energy-efficient, and would be consistent with growth expectations for LADWP's service area. Furthermore, as with the Project, during construction and operation, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and state energy standards under Title 24, and incorporate mitigation measures, as necessary. Therefore, the Project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of electricity would not be cumulatively considerable and, thus, would be less than significant.

Buildout of the Project, related projects, and additional forecasted growth in SoCalGas' service area would cumulatively increase the demand for natural gas supplies and infrastructure capacity. Based on the 2016 California Gas Report, the CEC estimates natural gas consumption within SoCalGas' planning area will be approximately 2,456 cf per day in 2022 (the Project's occupancy year). The Project would account for approximately 0.0002 percent of the 2022 forecasted consumption in SoCalGas planning area. SoCalGas' forecasts take into account projected population growth and development based on local and regional plans. Although Project development would result in the use of natural gas resources, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures rendering the Project more energy-efficient, and would be consistent with regional and local growth expectations for SoCalGas service area. Furthermore, future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and state energy standards under Title 24, and incorporate mitigation measures, as necessary. Therefore, the Project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of natural gas would not be cumulatively considerable and, thus, would be less than significant.

When accounting for the features that would be implemented to reduce VMT, the Project's estimated net petroleum-based fuel usage would be approximately 408,382 gallons of gasoline and 102,065 gallons of diesel per year, or a total of approximately 510,447 gallons of petroleum-based fuels annually. For comparison purposes, the fuel usage during Project operation would represent approximately 0.009 percent of the 2017 annual on-road gasoline-related energy consumption (4,294,811,614 gallons) and 0.02 percent of the 2017 annual diesel fuel-related energy consumption (607,534,327 gallons) in Los Angeles County.

Additionally, petroleum currently accounts for 90 percent of California's transportation energy sources; however, over the last decade the State has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce vehicle miles traveled which would reduce reliance on petroleum fuels. According to the CEC, gasoline consumption has declined by 6 percent since 2008, and would continue to decline for the next 10 years due to an increase in the use of alternative fuels, such as natural gas, biofuels, and electricity. As with the Project, other future development projects would be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions.

Furthermore, the Project would be consistent with the energy efficiency policies emphasized by the 2016 RTP/SCS. Specifically, the Project would be a mixed-use development consisting of residential and commercial uses located along commercial corridors that are characterized by a high degree of pedestrian activity. The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well-served by existing public transportation, including Metro and LADOT bus lines and rail line. The Project also would introduce new housing and job opportunities within a HQTA, which is consistent with numerous policies in the

2016 RTP/SCS related to locating new jobs near transit. These features would serve to reduce VMT and associated transportation fuel consumption. By its very nature, the 2016 RTP/SCS is a regional planning tool that addresses cumulative growth and resulting environmental effects. Since the Project is consistent with the 2016 RTP/SCS, it's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of transportation fuel would not be cumulatively considerable and, thus, would be less than significant.

Less Than Significant Impacts With Mitigation

The EIR determined that the Project has potentially significant environmental impacts in the areas discussed below. The EIR identified feasible mitigation measures to avoid or substantially reduce the environmental impacts in these areas to a level of less than significant. Based on the information and analysis set forth in the EIR, the Project would not have any significant environmental impacts in these areas based on the incorporation of all feasible mitigation measures are incorporated into the Project. The City again ratifies, adopts, and incorporates the full analysis, explanation, findings, responses to comments, and conclusions of the EIR.

a) Cultural Resources

(1) Archaeological Resources

According to the South Central Coastal Information Center, no archaeological resources are located within the Project Site. The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains existing buildings and a shed structure and a parking lot. The Project would require excavation for three subterranean parking levels (approximately 30 feet), utility and foundation work, and grading to level the Project Site. Thus, there is the potential for buried prehistoric and historic resources within the Project boundaries. If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Construction personnel of the Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. This is included as Mitigation Measure CUL-MM-1 below. Therefore, impacts would be less than significant.

(2) Paleontological Resources

The Project Site is located in an urbanized area, contains existing buildings and surface parking, and has been previously disturbed by past development activities. The Project would require excavation for subterranean parking levels, utility and foundation work, and grading to level the Project Site. Shallow excavations in the younger Quaternary Alluvium exposed throughout the proposed project area are unlikely to uncover significant fossil vertebrate remains. Deeper excavations in the proposed project area that extend down into the older Quaternary sediments, however, may well encounter significant vertebrate fossils. Thus, there is the potential for buried paleontological resources within the Project Site. Any substantial excavations in the proposed project area, therefore, would be closely monitored to quickly and professionally recover any potential vertebrate fossils without impeding development. Also, sediment samples should be collected and processed to determine the small fossil potential in the proposed project area. If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction

activity may continue unimpeded on other portions of the Project Site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. This is included as Mitigation Measure CUL-MM-2 below. Therefore, impacts would be less than significant.

(3) Mitigation Measures

Because the Project could result in significant cultural resources impacts related to archaeological and paleontological resources, the following mitigation measures are required:

CUL-MM-1 During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor, who shall be responsible for coordinating with a certified archaeologist to implement and enforce the following:

a. The services of an archaeologist, qualified for historic resource evaluation, as defined in CEQA and Office of Historic Preservation (OHP) Guidelines, shall be secured to implement the archaeological monitoring program. The qualified archaeologist shall be listed, or be eligible for listing, in the Register of Professional Archaeologist (RPA). Recommendations may be obtained by contacting the South Central Coastal Information Center (657- 278-5395) located at California State University Fullerton.

b. In the event of a discovery, or when requested by the Project archaeologist, the contractor shall divert, direct, or temporarily halt ground disturbing activities in an area in order to evaluate potentially significant archaeological resources.

i. It shall be the responsibility of the Project archaeologist to: determine the scope and significance of the find; determine the appropriate documentation; ensure preservation, conservation, and/or relocation of the find; and determine when grading/excavation activities may resume in the area of the find.

ii. Determining the significance of the find shall be guided by California Public Resources Code Division 13, Chapter 1, Section 21083.2, subdivision (g) and (h). If the find is determined to be a “unique archaeological resource”, then the applicant, in conjunction with the recommendation of the Project archaeologist, shall comply with Section 21083.2, subdivisions (b) though (f).

iii. If at any time the Project Site, or a portion of the Project Site, is determined to be a “historical resource” as defined in California Code of Regulations Chapter 3, Article 1, Section 15064.5, subdivision (a), the Project archaeologist shall prepare and issue a mitigation plan in conformance with Section 15126.4, subdivision (b).

iv. If the Project archaeologist determines that continuation of the Project or Project-related activities will result in an adverse impact on a discovered historic resource, which cannot be mitigated, all further activities resulting in the impact shall immediately cease, and the Lead Agency shall be contacted for further evaluation and direction.

v. The applicant shall comply with the recommendations of the Project archaeologist with respect to the documentation, preservation, conservation, and/or relocation of the find.

vi. The Construction Monitor shall also prepare and submit documentation of the Applicant's compliance with the Mitigation Measure CUL-MM-1 during construction every 30 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to report to the Enforcement Agency any non-compliance with the mitigation measure within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the Construction Monitor, or if the non-compliance is repeated. Such noncompliance shall be appropriately addressed by the Enforcement Agency.

c. Monitoring activities may cease when:

i. Initial grading and all excavation activities have concluded; or

ii. By written consent of the Project archaeologist, agreeing that no further monitoring is necessary. In this case, a signed and dated copy of such agreement shall be submitted to the Dept. of City Planning for retention in the administrative record for Case No. ENV-2016-4889-EIR.

d. At the conclusion of monitoring activities, and only if archaeological materials were encountered, the Project archaeologist shall prepare and submit a report of the findings to the South Central Coastal Information Center (SCCIC).

e. At the conclusion of monitoring activities, the Project archaeologist shall prepare a signed statement indicating the first and last dates monitoring activities took place, and submit it to the Department of City Planning, for retention in the administrative file for this case.

CUL-MM-2 During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor, who shall be responsible for coordinating with a certified paleontologist to implement and enforce the following:

a. If any paleontological materials are encountered during the course of Project development, the Construction Monitor, in accordance with CUL-MM-2, shall coordinate with the services of a paleontologist, and all further development activity shall halt and the following shall be undertaken:

i. 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.

ii. In the event of a discovery, or when requested by the Project paleontologist, the contractor shall divert, direct, or temporarily halt ground disturbing activities in an area in order to evaluate potentially

significant paleontologist resources. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

iii. The Construction Monitor shall also prepare and submit documentation of the Applicant's compliance with the Mitigation Measure CUL-MM-2 during construction every 30 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to report to the Enforcement Agency any non-compliance with the mitigation measure within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the Construction Monitor, or if the non-compliance is repeated. Such noncompliance shall be appropriately addressed by the Enforcement Agency.

iv. The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.

v. The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report.

b. At the conclusion of monitoring activities, the Project paleontologist shall prepare a signed statement indicating the first and last dates monitoring activities took place, and submit it to the Department of City Planning, for retention in the administrative file for this case. Copies of the paleontological survey, study or report shall also be submitted to the Los Angeles County Natural History Museum.

c. 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.

(4) Cumulative

With regard to potential cumulative impacts related to archaeological and paleontological resources, the vicinity area is urbanized and has been disturbed and developed over time. In the event that archaeological and paleontological resources are uncovered, all related projects and other future development would be required to comply with applicable regulatory requirements. In addition, as part of the environmental review processes for the related projects, it is expected that mitigation measures would be established as necessary to address the potential for uncovering paleontological resources. Therefore, the Project's impacts to archaeological and paleontological resources would not be cumulatively considerable, and cumulative impacts would be less than significant.

(5) Finding

With respect to the potential impacts regarding cultural resources related to archaeological and paleontological resources associated with the Project, each decision-making body of the City adopts the first possible finding as outlined above in Section I, which states that

"changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (CEQA Guidelines Section 15091(a)(1)).

(a) Rationale for Finding

The potential Project impact on a unique archaeological resource or paleontological resource or site or unique geologic feature would be reduced to a less-than-significant level with the implementation of Mitigation Measures CUL-MM-1 and CUL-MM-2, which would preclude the possibility of causing a potential impact through the accidental discovery as a result of excavation and construction activities.

(b) Reference

For a complete discussion of the Project's impacts associated with cultural resources, see Section IV.B, Cultural Resources, of the Draft EIR. See also Appendices E-1, E-2, and E-3 of the Draft EIR.

b) Noise

(1) Construction Vibration

It should be noted that equations for the prediction of groundborne vibration can overestimate vibration levels at distances nearer than 25 feet, and especially when distances are below 10 feet. And even so, all construction activities beyond 10 feet from 2145-2159 Sacramento Street would not be projected to generate groundborne vibration levels in excess of this receptor's 0.25 inches per second PPV threshold. Nevertheless, the Project's impact at 2145-2159 Sacramento Street would be considered significant, prior to mitigation. Mitigation Measures NOI-MM-1 and NOI-MM-2 would implement construction sequencing and a monitoring program in relation to vibration. These measures would substantially reduce the potential for the Project's construction-related vibrations to damage these receptors. With these measures in place, the Project's construction vibration impact would be less than significant. In addition, 2145-2159 Sacramento Street is currently incorporated as a part of Related Project No. 45, an 8-story office building project located at 2159 E. Bay Street. If 2145-2159 Sacramento Street were to be demolished prior to the construction of the Project, there would be no impact at this receptor. Nevertheless, this analysis assumes a scenario with the building intact during the Project's construction. The FTA considers "auditoriums and theaters"; "Concert halls, TV studios, and recording studios"; "Institutional land uses with primarily daytime uses"; and "Residences and buildings where people normally sleep" to be sensitive to groundborne vibration. No land use surrounding the Project Site falls into any of these categories. Other land uses would not be considered sensitive to groundborne vibrations from the Project's temporary activities, especially the numerous industrial, manufacturing, and warehouse uses in the vicinity of the Project. As a result, the Project's potential to disrupt nearby vibration-sensitive land uses would be considered less than significant.

(2) Mitigation Measures

NOI-MM-1 Construction activities that produce vibration (i.e. excavation work or auger drilling foundations or shoring piles) shall be sequenced so that vibration sources within ten feet of the existing building at 2145-2159 Sacramento Street do not operate simultaneously.

NOI-MM-2 Prior to the start of Project construction, the Applicant shall retain the services of a qualified structural engineer to conduct pre-construction surveys to document

the conditions at the boundary of the Project Site (surveys conducted on the Project Site) adjacent to 2145-2159 Sacramento Street and document the apparent physical condition of the readily-visible features, including but not limited to the exterior building structure of the existing building at 2145-2159 Sacramento Street. The Applicant shall request access to the interior to observe interior walls and ceiling finishes. If access is denied, interior conditions would not be considered as existing physical conditions.

The Applicant shall retain the services of a qualified acoustical engineer to review the proposed construction equipment and develop and implement a vibration monitoring system capable of documenting the construction-related ground vibration levels at the existing building at 2145-2159 Sacramento Street during site demolition, excavation and pile installation, where heavy construction equipment (e.g., large bulldozer, excavator, drill rig) would be operating within ten feet of 2145-2159 Sacramento Street. Vibration monitoring shall include the following:

a. The vibration monitoring system shall measure and store the peak particle velocity (PPV) in inch/second to determine whether the groundborne vibration levels at the boundary of the Project Site adjacent to the existing building at 2145-2159 Sacramento Street reach 0.25 PPV inches/second.

b. The vibration monitoring system shall include documentation, consisting of video and/or photographic documentation, of accessible and visible areas on the exterior of the existing building at 2145-2159 Sacramento Street.

c. The vibration monitoring system shall survey for vertical and horizontal movement, as well as vibration thresholds.

d. In the event the PPV reaches 0.20 PPV inch/second at the façade of the existing building at 2145-2159 Sacramento Street.

    i. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including, but not limited to, halting/staggering concurrent activities and utilizing lower vibratory techniques. Construction activities may then restart.

e. In the event the PPV reaches 0.25 PPV inch/second at the façade of the existing building at 2145-2159 Sacramento Street.

    i. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including, but not limited to, halting/staggering concurrent activities and utilizing lower vibratory techniques.

    ii. The qualified professional shall visually inspect the adjacent façade of the existing building at 2145-2159 Sacramento Street for any damage. The results of the inspection must be logged. Vibration measurement shall be made with the new construction method to verify that the vibration level is below the warning level of 0.20 PPV. Construction activities may then restart.

    iii. In the event damage occurs due to construction vibration, such damage shall be repaired.

f. The vibration monitoring system shall be submitted to the Department of Building and Safety and received into the case file for the associated discretionary action permitting the Project prior to initiating any construction activities.

(3) Finding

With respect to the potential impacts regarding building damage from construction vibration from the Project, each decision-making body of the City adopts the first possible finding as outlined above in Section I, which states that "changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (CEQA Guidelines Section 15091(a)(1)).

(a) Rationale for Finding

Mitigation Measures NOI-MM-1 and NOI-MM-2 would reduce the Project's vibration sources and implement a comprehensive monitoring program for the identified receptors. These measures would substantially reduce the potential for the Project's construction-related vibrations to damage these receptors. With these measures in place, the Project's construction vibration impact as it relates to potential building damage would be considered less than significant.

(b) Reference

For a complete discussion of the Project's impacts associated with noise, see Section IV.H, Noise, of the Draft EIR. See also Appendix H, of the Draft EIR.

SIGNIFICANT AND UNAVOIDABLE IMPACTS

The Final EIR determined that the environmental impacts set forth below are significant and unavoidable. In order to approve the project with significant unmitigated impacts, the City is required to adopt a Statement of Overriding Considerations, which is set forth below. No additional environmental impacts other than those identified below will have a significant effect or result in a substantial or potentially substantial adverse effect on the environment as a result of the construction or operation of the project.

a) Transportation/Traffic

(1) Intersection Impact

The Project would significantly impact the following nine study intersections under Future (2022) conditions, prior to mitigation:

#4. Alameda Street & 7th Street (PM peak hour)

#6. Mateo Street & 7th Street (PM peak hour)

#7. Santa Fe Avenue & 7th Street (AM and PM peak hours)

#9. Santa Fe Avenue & Porter Street (PM peak hour)

#10. Santa Fe Avenue & Olympic Boulevard (AM peak hour)

#12. Soto Street & 4th Street (AM and PM peak hours)

#13. Soto Street & Whittier Boulevard (AM and PM peak hours)

#14. Soto Street & 7th Street (PM peak hour)

#16. Mateo Street & 6th Street (PM peak hour)

The implementation of a comprehensive TDM plan, installation of signal system upgrades at select intersection locations, and provision of shuttle service between the Project site and a Metro rail station would reduce the Project's impacts to less-than-significant levels at eight of nine significantly impacted intersections. These measures would also help reduce the Project's impacts at the intersection of Soto Street & Whittier Boulevard. However, these measures would not be able to mitigate the Project impacts at Soto Street & Whittier Boulevard to less-than-significant levels. Therefore, the Project impacts at this study intersection would remain significant and unavoidable.

(2) Mitigation Measures

TRANS-MM-1 Transportation Demand Management (TDM) Plan

The purpose of a TDM plan is to reduce the use of single occupant vehicles (SOV) by increasing the number of trips by walking, bicycle, carpool, vanpool and transit. A TDM plan should include design features, transportation services, education, and incentives intended to reduce the amount of SOV during commute hours. Through strategic building design and orientation, the Project can facilitate access to transit, can provide a pedestrian-friendly environment, can promote non-automobile travel and can support the goals of a trip-reduction program.

A preliminary TDM plan shall be prepared and provided for LADOT review prior to the issuance of the first building permit for the Project and a final TDM plan approved by LADOT is required prior to the issuance of the first certificate of occupancy for the Project. The TDM plan may include, but not be limited to, the following strategies:

- Provide an internal Transportation Management Coordination Program with an on-site transportation coordinator;
- Provide a bulletin board, display case, or kiosk with information on transportation options that includes, but is not limited to:
    - Current routes and schedules for public transit;
    - Telephone numbers for information on transportation that includes regional ridesharing and local transit operations;
    - Promotional material on ridesharing from commuter-oriented organizations;
    - Regional and local bicycle route and facility information; and
    - A listing of on-site services or facilities which are available for carpools, vanpools, bicyclists and transit riders.

- Design the Project to ensure a bicycle, transit, and pedestrian friendly environment;
- Administrative support for the formation of carpools/vanpools;
- Designated parking areas for employee carpools and vanpools with the identification, location, design, and application as described in the study;
- One permanent carpool/vanpool for the first 50,000 to 100,000 square-feet of gross floor area and an additional carpool/vanpool space for development over 100,000 square-feet;A provision requiring compliance with the State Parking Cash-out Law in all leases;
- Coordinate with LADOT to determine if the Project location is eligible for a future Integrated Mobility Hub (which can include space for a bike share kiosk, and/or parking spaces on-site for car-share vehicles);
- Unbundled parking from housing costs;
- Transit Incentives which includes, but is not limited to:
    - Flexible/alternative work schedules and telecommuting programs;
    - Guaranteed ride home program;
    - Transit routing and schedule information;
    - Provide rideshare matching services;
    - Implement a transit pass discount program for Project residents and employees;
    - Establish bike and walk to work promotions;
    - Where applicable, consult with local bus service for possible improvements;
- Preferential rideshare and bike share loading/unloading or parking location;
- Participate in an Arts District Transportation Management Organization (TMO), if and when a TMO is formed;
- Make a one-time financial contribution of $50,000 to the City of Los Angeles Department of Transportation to be used in the implementation of the Mobility Hub in the general area of the Project; and
- Contribute a one-time fixed fee contribution of $50,000 to be deposited into the City's Bicycle Plan Trust Fund to implement bicycle improvements in the vicinity of the Project.

TRANS-MM-2 Project Shuttle Service

To enhance the TDM measures mentioned previously and in addition to the signal system upgrades, the Project shall provide a shuttle service between the Project site and either the Metro Gold Line Little Tokyo/Arts District Station (to be replaced in the future by the 1st Street/Central Avenue Station) or Union Station. The shuttle shall be free to users from the Project and the surrounding community. The shuttle service shall be provided via a 30 passenger bus (similar to LADOT DASH bus) privately owned and operated independent of existing bus service.

TRANS-MM-3 Transportation Systems Management (TSM) Improvements

Install new CCTVs at the following intersections:

- 7th Street and Santa Fe Avenue
- Olympic Boulevard and Santa Fe Avenue
- Mission Road and Whittier Boulevard
- 4th Street and Soto Street
- 7th Street and Soto Street

Should the Project be approved, then a final determination on how to implement these CCTV installations would be made by LADOT prior to the issuance of the first building permit. These installations would be implemented either by the applicant through the B-Permit process of the Bureau of Engineering (BOE), or through payment of a one-time fixed fee to LADOT to fund the cost of the upgrades. If LADOT selects the payment option, then the applicant would be required to pay LADOT, and LADOT shall design and construct the upgrades. If the installations are implemented by the applicant through the B-Permit process, then these improvements must be guaranteed prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy. Temporary certificates of occupancy may be granted in the events of any delay through no fault of the applicant, provided that, in each case, the applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT.

(3) Finding

Each decision making body of the City finds that all feasible mitigation measures to substantially reduce or avoid the project's intersection impacts have been incorporated into the project.

In accordance with CEQA Guidelines Section 15091, the City finds that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen these significant environmental impacts. The City also finds that specific economic, legal, social, technological or other considerations, including provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or project alternatives. However, while implementation of mitigation measures will reduce the impacts, the project's traffic impacts will be significant and unavoidable.

(a) Rationale for Finding

To align with the goals outlined in the 2035 Mobility Plan, physical mitigation measures intended to increase vehicular roadway capacity are generally not accepted as viable mitigation strategies by the LADOT. However, given that the implementation of the comprehensive TDM plan, system signal upgrades, and shuttle service would not be expected to mitigate the anticipated Project traffic impacts to less-than-significant levels at the intersection of Soto Street & Whittier Boulevard, potential physical mitigation measures were also examined. As detailed above, the segment of Soto Street including the intersection with Whittier Boulevard is planned for the installation of northbound and southbound bicycle lanes that will decrease the number of vehicular through travel lanes from two to one in each direction. This improvement is part of a Safe Routes To School (SRTS) neighborhood safety improvement project. Therefore, widening for potential physical improvements on the Soto Street legs of this intersection is infeasible.

In addition, Whittier Boulevard is designated an Avenue II roadway per the Mobility Plan 2035. As an Avenue II roadway, the ultimate dimensions consist of a 56-foot wide roadway within an 86-foot wide right-of-way. At its intersection with Soto Street, Whittier Boulevard already maintains a roadway width of 56 feet within a right-of-way width of 86 feet. As such, widening either leg of this roadway to mitigate the Project's significant traffic impact would require narrowing the existing sidewalks to a width less than the standard 15 feet for Avenue II roadways, or the acquisition of private property and partial demolition of private structures. Such a reduction in sidewalk widths would be contrary to the City's aims outlined in the Mobility Plan 2035, the Los Angeles Complete Streets Design Guide, and other planning documents. Considering these factors, physical mitigation measure is not considered feasible for this intersection.

As outlined above, the implementation of a comprehensive TDM plan, installation of signal system upgrades at select intersection locations, and provision of shuttle service between the Project site and a Metro rail station would reduce the Project's impacts to less-than-significant levels at eight of nine significantly impacted intersections. These measures would also help reduce the Project's impacts at the intersection of Soto Street & Whittier Boulevard. However, these measures would not be able to mitigate the Project impacts at Soto Street & Whittier Boulevard to less-than-significant levels. Therefore, the Project impacts at this study intersection would remain significant and unavoidable.

(b) Reference

For a complete discussion of the Project's impacts associated with noise, see Section IV.K, Transportation/Traffic, of the Draft EIR. See also Appendix J, of the Draft EIR.

ALTERNATIVES

CEQA requires that an EIR analyze a reasonable range of feasible alternatives that could substantially reduce or avoid the significant impacts of a project while also meeting the project's basic objectives. An EIR must identify ways to substantially reduce or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1). Accordingly, the discussion of alternatives shall focus on alternatives to a project or its location which are capable of avoiding or substantially reducing any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The alternative analysis included in the Draft EIR, therefore, identified a reasonable range of project alternatives focused on avoiding or substantially reducing the project's significant impacts.

a) Summary of Findings

Based upon the following analysis, the City finds, pursuant to CEQA Guidelines Section 15096(g)(2), that there are two feasible alternatives that will substantially lessen any significant effect of the project, reduce the significant unavoidable impacts of the project to a level that is less than significant, or avoid any significant effect the project would have on the environment.

b) Project Objectives

Section 15124(b) of the California Environmental Quality Act (CEQA) Guidelines states that a project description shall contain "a statement of the objectives sought by the proposed project." In addition, Section 15124(b) of the State CEQA Guidelines further states that "the statement of objectives should include the underlying purpose of the project." The objectives of the Project are as follows:

1. **Provide a set of mixed-uses that takes maximum advantage of a smart growth opportunity of a currently vacant and utilized site.**

    - Fully utilize the Project site consistent with the goals and policies in the Central City North Community Plan.
    - Construct a development that incorporates a high quality structure, landscaping and aesthetics, and creates a more beautiful and livable neighborhood environment.
    - Improve the visual character of the Project area by developing a vacant and underutilized site.
    - Activate the industrial area with new contemporary commercial opportunities that could serve the employees and new residents in the area.

2. **Provide needed housing.**

    - Provide high density residential dwelling units to serve a range of potential renters including the provision of deed Restricted Affordable units, as well as provide the necessary infrastructure and associated amenities.
    - Provide housing that contributes towards the City's Regional Housing Needs Assessment.
    - Develop additional housing stock at an infill location that is close to commercial and office locations.
    - Provide affordable housing in a mixed-income community and near transit.

3. **Promote fiscal benefits, economic development, and job creation.**

    - Create construction jobs through construction of a new mixed-use development.
    - Develop residential and commercial uses that generate local tax revenues and provide new permanent jobs and housing for residents who could support local business.

4. Create an environmentally sensitive development.

- Incorporate sustainable and green building design and construction to promote resource conservation, including waste reduction, efficient water management techniques, and conservation of energy to achieve a LEED-Gold certified building.

- Incorporate sustainable and green building design and construction to promote resource conservation, including waste reduction, efficient water management techniques, and conservation of electricity and energy.

5. Encourage alternative modes of transportation and reduce vehicle trips.

- Create a sustainable balance of commercial and residential uses located within a transit priority area.

- Reduce vehicle miles traveled (VMT) and pollutant emissions by developing a site that is adjacent to a significant employment node.

c) Alternatives Rejected as Being Infeasible

As set forth in CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternative to the Project that have been considered and rejected as infeasible include the following:

Alternative Project Site – The Project Applicant already owns the Project Site and cannot reasonably be expected to acquire, control, or access an alternative site in a timely fashion. Additionally, development of the Project at an alternative site could potentially produce other environmental impacts that would otherwise not occur at the current Project Site and result in greater environmental impacts when compared with the Project. Therefore, an alternative site is not considered feasible since the Project Applicant does not own another suitable site that would achieve the underlying purpose and objectives of the Project.

d) Alternatives Analyzed in the Draft EIR and Final EIR

CEQA requires that an EIR analyze a reasonable range of feasible alternatives that could substantially reduce or avoid the significant impacts of a project while also meeting a project's basic objectives.

Each decision-making body of the City finds that given the potential impacts of the project, the Final EIR considered a reasonable range of alternatives to the project to provide informed decision-making in accordance with Section 15126.6 of the CEQA Guidelines.

Based on the significant environmental impact of the project and the objectives established for the project, the following alternatives to the project were evaluated in the EIR:

Alternative 1 – No Project. Alternative 1 continues the existing uses (the existing open air shed and 4,000 square feet manufacturing that is vacant) and proposed no changes. No uses or activity at the Site.

Alternative 2 – All Office/Commercial. Alternative 2 would have the same 287,137 square feet floor area (3.9:1 FAR) as the Project. Alternative 2 would have the same 50,848 square feet commercial as the Project (43,657 square feet of leasable space) and the same 8,114 square feet of covered ancillary space as part of the adaptive reuse of the shed structure. Alternative 2 would allocate the Project's 114,825 square feet of residential to office for a new total of 228,175 square feet of office. There would be no residential uses.

Alternative 3 – Reduced Intensity. Alternative 3 provides a 45 percent reduction across all uses proposed as part of the Project: 61 residential dwelling units; 62,343 gross square feet of creative office space; and 27,966 sf commercial (24,011 square feet of leasable space). No affordable units would be provided.

Alternative 4 – Zoning Compliant. Alternative 4 would have a 111,035 square-foot manufacturing building (1.5:1 FAR) which is provided for under the current zoning.

(1) Alternative 1: No Project

CEQA requires the alternatives analysis to include a "no project" alternative, which is the circumstance under which the Project does not proceed. The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project (CEQA Guidelines Section 15126.6[e][1]). Pursuant to CEQA Guidelines Section 15126.6(e)(2), requirements of the analysis of the "no project" alternative are as follows:

> The "no project" analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans, and consistent with available infrastructure and community services.

Accordingly, for purposes of this analysis, Alternative 1, the No Project Alternative, assumes that the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environment would be maintained. Thus, the physical conditions of the Project Site would generally remain as they are today. Specifically, the Site would remain with a vacant building and unused shed structure, and no new construction would occur.

(a) Comparison of Impacts

Alternative 1 would avoid the Project's significant and unavoidable traffic impact at the intersection impact at Soto Street and Whittier Boulevard which cannot be feasibly mitigated to less than significant. Impacts associated with the remaining environmental issues would be less than those of the Project.

(b) Finding

With respect to the Alternative 1, each decision making body adopts a finding, which states that "specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the final EIR." (CEQA Guidelines § 15091(a)(3).)

(c) Rationale for Finding

Under Alternative 1, the existing vacant status of the Site would remain, and no new development would occur. As such, Alternative 1 would not meet the underlying purpose of the Project or any of the Project's objectives.

(d) Reference

For a complete discussion of impacts associated with Alternative 1, see Section VI, Alternatives, of the Draft EIR.

(2) Alternative 2: All Commercial/Office

Alternative 2 would have the same 287,137 square feet floor area (3.9:1 FAR) as the Project. Within that, Alternative 2 would have the same 50,848 square feet commercial as the Project (for purposes of traffic, commercial uses 43,657 square feet of leasable space) and the same 8,114 square feet of covered ancillary space as part of the adaptive reuse of the shed structure as the Project. Alternative 2 would allocate the Project's 114,825 square feet of residential to office for a new total of 228,175 square feet of office. Alternative 2 would not have any residential uses. Alternative 2 would involve more excavation and grading due to the deeper parking garage (an additional 1/2 subterranean parking level is needed) as compared to the Project. Additional parking spaces are needed for the additional office use as compared to the Project's residential uses. Alternative 2 would involve a similar overall amount of construction since the same amount of floor area would be built as compared to the Project. Upon completion, Alternative 2 would result in a maximum FAR of 3.9:1, same as the Project.

(a) Comparison of Impacts

Alternative 2 would not avoid the Project's significant and unavoidable impact that cannot be feasibly mitigated with respect to traffic (intersection of Soto and Whittier). Alternative 2 would result in 6 intersections with significant and unavoidable intersection impacts, as compared to 1 under the Project. Impact conclusions associated with the remaining environmental issues would be the same as those of the Project.

(b) Finding

With respect to the Alternative 2, each decision making body adopts a finding, which states that "specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the final EIR." (CEQA Guidelines § 15091(a)(3).)

(c) Rationale for Finding

Alternative 2 would partially meet Project Objectives 1, 3, and 5. Alternative 2 would not meet Project Objective 2. Alternative 2 would meet Project Objective 4.

Because Alternative 2 does not include development of housing at the Project Site, this alternative would only partially meet Project Objective 1. Alternative 2 could be designed and constructed to meet goals and policies of the Community Plan, improve the visual character of the Project Site area, and activate the industrial area with new contemporary commercial opportunities that could serve the employees and new residents in the area. However, without development of housing at the Project Site, Alternative 2 misses the opportunity to maximize the

smart-growth potential of the Project Site that is a result of combining housing and commercial land uses on one site.

Because Alternative 2 does not include development of any housing at the Project Site, this alternative would not meet Project Objective 2. Alternative 2 would miss the opportunity to provide housing, including affordable housing, in an area in need of new housing, as identified in the City's Regional Housing Needs Assessment.

Because Alternative 2 includes development of commercial and office land uses, which would provide jobs and generate tax revenue, this alternative would partially meet Project Objective 3. However, because Alternative 2 does not include housing, this alternative would miss the opportunity to provide housing for residents who support local businesses.

As with any development in the City, Alternative 2 would be constructed and designed to incorporate green building standards, including LEED standards. Alternative 2 would meet Project Objective 4.

Due to the Project Site's location in a Transit Priority Area and its proximity to ample transit options and the City's requirements for bicycle parking, any development of the Project Site (including that as part of Alternative 2) would encourage the use of alternative modes of transportation. However, because Alternative 2 does not include development of any housing at the Project Site and would not place a residential population in proximity to employment and shopping options, this alternative would not reduce VMT and associated pollutant emissions to the same extent that the Project would. For these reasons, Alternative 2 would only partially meet Project Objective 5.

(d) Reference

For a complete discussion of impacts associated with Alternative 2, see Section VI, Alternatives, of the Draft EIR.

(3) Alternative 3: Reduced Intensity

Alternative 3 provides a 45 percent reduction across all uses proposed as part of the Project: 61 residential dwelling units (as compared to 110 units under the Project); 62,343 gross square feet of creative office space (as compared to 113,350 square feet under the Project); and 27,966 sf commercial (24,011 square feet of leasable space; as compared to 50,848 square feet (43,657 square feet leasable space) under the Project). No affordable units would be provided as compared to 12 affordable units in the Project. Alternative 3 would involve a similar amount of grading and excavation needed for shoring for the buildings as compared to the Project. Alternative 3 would involve a reduced overall amount of construction since 45 percent less floor area would be built as compared to the Project. Upon completion, Alternative 3 would result in a maximum FAR of 2.0:1, less than the Project's 3.9:1.

(a) Comparison of Impacts

Alternative 3 would result in no significant and unavoidable intersection impacts, as compared to 1 under the Project. Impact conclusions associated with the remaining environmental issues would be the same as those of the Project.

(b) Finding

With respect to the Alternative 3, each decision making body adopts a finding, which states that "specific economic, legal, social, technological, other considerations, including

considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the final EIR." (CEQA Guidelines § 15091(a)(3).)

(c) Rationale for Finding

Alternative 3 would meet Project Objectives 4 and 5. Because Alternative 3 includes a 45 percent reduction in land uses as compared to the Project, this alternative would also meet Project Objectives 1 and 3, but to a lesser degree. Due to the reduction in the number of housing units included as part of Alternative 3 as compared to the Project and the lack of any affordable housing, Alternative 3 would only partially meet Project Objective 2.

Because Alternative 3 includes development of land uses similar to those proposed as part of the Project, but reduced by 45 percent, this alternative would meet Project Objective 1, but to a lesser degree than the Project; due to the reduced size, maximum smart-growth development of the Project Site might not be achieved under this alternative. Additionally, Alternative 3 would not provide as many job and housing opportunities to the Project Site area as would the Project.

Although Alternative 3 includes development of some housing at the Project Site, the number of dwelling units provided as part of this alternative would be 45 percent fewer (49 fewer units) than would be provided under the Project. As such, Alternative 2 would contribute fewer dwelling units toward the number of needed housing units identified in the City's Regional Housing Needs Assessment. Additionally, Alternative 3 does not include any affordable housing. Thus, Alternative 3 would only partially meet Project Objective 2.

Because Alternative 3 includes development of land uses similar to those proposed as part of the Project, but reduced by 45 percent, this alternative would meet Project Objective 3, but to a lesser degree than the Project.

As with any development in the City, Alternative 3 would be constructed and designed to incorporate green building standards, including LEED standards. Alternative 3 would meet Project Objective 4.

Due to the Project Site's location in a Transit Priority Area and its proximity to ample transit options and the City's requirements for bicycle parking, any development of the Project Site (including that as part of Alternative 3) would encourage the use of alternative modes of transportation and reduce VMT and associated pollutant emissions. For these reasons, Alternative 3 would meet Project Objective 5.

(d) Reference

For a complete discussion of impacts associated with Alternative 3, see Section VI, Alternatives, of the Draft EIR.

(4) Alternative 4: Zoning Compliant

The Project Site is zoned M3-1-RIO (Manufacturing, Height District 1, River Improvement Overlay) and has a General Plan designation of Heavy Manufacturing. The Project Site buildable area (not the same as lot area) is 74,023 square feet. The permitted floor area ratio (FAR) for the existing Height District (HD) 1 is 1.5:1 (111,035 square feet). Alternative 4 would have a 111,035 square-foot manufacturing building (1.5:1 FAR) which is provided for under the current zoning.

(a) Comparison of Impacts

Alternative 4 would result in no significant and unavoidable intersection impacts, as compared to 1 under the Project. Impact conclusions associated with the remaining environmental issues would be the same or reduced as those of the Project.

(b) Finding

With respect to the Alternative 4, each decision making body adopts a finding, which states that "specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the final EIR." (CEQA Guidelines § 15091(a)(3).)

(c) Rationale for Finding

Alternative 4 would meet Project Objective 4.

Because Alternative 4 does not include development of housing at the Project Site, this alternative would only partially meet Project Objective 1. Alternative 4 could be designed and constructed to meet goals and policies of the Community Plan, improve the visual character of the Project Site area, and activate the industrial area with new manufacturing opportunities (albeit not contemporary commercial opportunities) that could serve the employees and new residents in the area. However, without development of housing at the Project Site, Alternative 4 misses the opportunity to maximize the smart-growth potential of the Project Site that is a result of combining housing and commercial land uses on one site.

Because Alternative 4 does not include development of any housing at the Project Site, this alternative would not meet Project Objective 2. Alternative 4 would miss the opportunity to provide housing, including affordable housing, in an area in need of new housing, as identified in the City's Regional Housing Needs Assessment.

Because Alternative 4 includes development of manufacturing land uses, which would provide jobs and generate tax revenue, this alternative would partially meet Project Objective 3. However, because Alternative 4 does not including housing, this alternative would miss the opportunity to provide housing for residents who support local businesses.

As with any development in the City, Alternative 4 would be constructed and designed to incorporate green building standards, including LEED standards. Alternative 4 would meet Project Objective 4.

Due to the Project Site's location in a Transit Priority Area and its proximity to ample transit options and the City's requirements for bicycle parking, any development of the Project Site (including that as part of Alternative 4) would encourage the use of alternative modes of transportation. However, because Alternative 4 does not include development of any housing at the Project Site and would not place a residential population in proximity to employment and shopping options, this alternative would likely not reduce VMT and associated pollutant emissions to the same extent that the Project would. For these reasons, Alternative 4 would only partially meet Project Objective 5.

(d) Reference

For a complete discussion of impacts associated with Alternative 4, see Section VI, Alternatives, of the Draft EIR.

e) Environmentally Superior Alternative

CEQA requires that an EIR alternatives analysis include designation of an "environmentally superior" alternative. Based on the analysis presented in this section, Alternative 1: No Project would be environmentally superior to the Project, since this alternative would avoid all of the significant (but mitigatable) impacts that would occur under the Project, including Noise (Construction Vibration), and the significant and unavoidable impact related to Transportation/Traffic (Operational Intersection LOS). Also, Alternative 1 would not meet any of the Project Objectives.

CEQA requires that if the environmentally superior alternative is the "No Project" alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives (CEQA Guidelines, Section 15126.6[e][2]).

Alternative 3 would include development of the Project site with a mix of land uses that are similar to those proposed under the Project, to a lesser intensity. As a result, this alternative would result in an overall reduction in the amount of construction and operational pollutant emissions, demand for public services, construction traffic trips, daily and peak-hour operational traffic trips, generation of wastewater and solid waste, and consumption of water, when compared to the Project.

Accordingly, Alternative 3 was selected as the Environmentally Superior, because this alternative would reduce the significant and unavoidable Project traffic intersection impact at Soto and Whittier.

As discussed previously, Alternative 3 would meet Project Objectives 4 and 5. Because Alternative 3 includes a 45 percent reduction in land uses as compared to the Project, this alternative would also meet Project Objectives 1 and 3, but to a lesser degree. The City's Housing Element and the Regional Housing Needs Assessment (RHNA) has identified a housing crisis due in part to a lack of overall provision of housing stock to meet the growing population, the lack of a geographic balance between residential and jobs centers, and diversity in housing price points. The Housing Element has identified 453 sites (179.6 acres) in the Central City North Community Plan Area as having the housing capacity for 11,490 net units. The Project and Alternative 3 (Reduced Intensity) are the only scenarios that provide housing toward fulfilling the City's RHNA. Alternative 1, Alternative 2, and Alternative 4 do not include any housing. Due to the reduction in the number of housing units included as part of Alternative 3 as compared to the Project and the lack of any affordable housing, Alternative 3 would only partially meet Project Objective 2. Only the Project maximizes the number of housing units provided and only the Project provides affordable housing.

OTHER CEQA FINDINGS

a) Summary of Significant and Unavoidable Impacts

Pursuant to Section 15126.2(b) of the CEQA Guidelines, the City finds that the Project would result in significant and unavoidable environmental impacts with respect to traffic.

The implementation of a comprehensive TDM plan, installation of signal system upgrades at select intersection locations, and provision of shuttle service between the Project site and a Metro rail station would reduce the Project's impacts to less-than-significant levels at eight of nine significantly impacted intersections. These measures would also help reduce the Project's impacts at the intersection of Soto Street & Whittier Boulevard. However, these measures would not be able to mitigate the Project impacts at Soto Street & Whittier Boulevard to less-than-

significant levels. Therefore, the Project impacts at this study intersection would remain significant and unavoidable.

b) Significant Irreversible Environmental Changes

Pursuant to section 15126.2(c) of the CEQA Guidelines, the City considered the potential significant irreversible environmental changes that could result from the Project. The Project would necessarily consume a limited amount of slowly renewable and nonrenewable resources that could result in irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime.

The Project would necessarily consume a limited amount of slowly renewable and non-renewable resources that could result in irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. As demonstrated below, the Project would consume a limited commitment of natural resources and would not result in significant irreversible environmental changes.

c) Growth-Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a wastewater treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

Overall, the Project would be consistent with the growth forecast for the City of Los Angeles Subregion and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of vehicle miles traveled. In addition, the Project would not require any major roadway improvements nor would the Project open any large undeveloped areas for new use. Any access improvements would be limited to driveways necessary to provide immediate access to the Project Site and to improve safety and walkability. Therefore, direct and indirect growth-inducing impacts would be less than significant.

Additional CEQA/Environmental Findings

1. The City, acting through the Planning Department, is the "Lead Agency" for the Project evaluated in the Final EIR. The City finds that the Final EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the Final EIR, and that the Final EIR reflects the independent judgment of the City.

2. The City finds that the Final EIR provides objective information to assist the decision-makers and the public at large in their consideration of the environmental consequences of the Project. The public review period provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft EIR. The Final EIR was prepared after the review period and adequately responds to comments made during the public review period.

3. The Planning Department evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the Planning Department prepared written responses describing the disposition of significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned responses to the comments. The Planning Department reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR as defined under CEQA. The lead agency has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the Final EIR.

4. The mitigation measures which have been identified for the Project were identified in the text and summary of the Final EIR. The final mitigation measures are described in the Mitigation Monitoring Program. Each of the mitigation measures identified in the Mitigation Monitoring Program, and contained in the Final EIR, is incorporated into conditions of approval for the Project. The City finds that the impacts of the Project have been mitigated to the extent feasible by the mitigation measures identified in the Mitigation Monitoring Program and contained in the Final EIR.

5. CEQA requires the lead agency approving a project to adopt a Mitigation Monitoring Program and make that Program a condition of project approval in order to ensure compliance with project implementation. The mitigation measures included in the Final EIR as certified by the City and included in the Mitigation Monitoring Program as adopted by the City serve that function. The Mitigation Monitoring Program includes all the mitigation measures identified in the Final EIR and has been designed to ensure compliance during implementation of the Project. In accordance with CEQA, the Mitigation Monitoring Program provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of Public Resources Code section 21081.6, the City hereby adopts the Mitigation Monitoring Program.

6. In accordance with the requirements of Public Resources Code section 21081.6, the City hereby adopts each of the mitigation measures expressly set forth herein as conditions of approval for the Project.

7. The custodian of the documents or other materials which constitute the record of proceedings upon which the City's decision is based is the Department of City Planning, City of Los Angeles.

8. The City finds and declares that substantial evidence for each and every finding made herein is contained in the Final EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.

9. The citations provided as references in the Final and Draft EIR for each impact area discussed in these Findings are for reference purposes only and are not intended to represent an exhaustive listing of all evidence that supports these Findings.

10. The City is certifying the EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the Final EIR. It is contemplated that there may be a variety of actions undertaken by other State and local agencies (who might be referred to as "responsible agencies" under CEQA). Because the City is the lead agency for the Project, the Final EIR is intended to be the basis for compliance with CEQA for each of the possible discretionary actions by other State and local agencies to carry out the Project.

CONSIDERATION AND APPROVAL OF FINAL EIR

Pursuant to Article 7 of the CEQA Guidelines, these Findings have been prepared for the consideration and approval of the Final EIR and the analysis contained herein. The Final EIR was completed in accordance with CEQA; and the decision-making body has reviewed and considered the information contained in the Final EIR prior to the action. Since the Project will result in a significant and unavoidable impact related to traffic, a Statement of Overriding Considerations will be required.

STATEMENT OF OVERRIDING CONSIDERATIONS

The Final EIR for the Project has identified unavoidable and significant impacts that will result from implementation of the Project. Section 21081 of the Public Resources Code and Section 15093(b) of the CEQA Guidelines provide that when a public agency's decision allows the occurrence of a significant impact identified in a Final EIR, which is not substantially mitigated to an insignificant level or eliminated entirely, the lead agency must state in writing the reasons to support its action based on the completed EIR and/or other information in the record. Article I of the City of Los Angeles CEQA Guidelines incorporates all of the State CEQA Guidelines contained in title 15, California Code of Regulations, sections 15000 et seq., and hereby requires, pursuant to CEQA Guidelines Section 15093(b) that the decision-maker adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that significant adverse environmental effects have been identified in the Final EIR that cannot be substantially mitigated to an insignificant level or be eliminated. These Findings and the Statement of Considerations are based on the record of proceedings, including, but not limited to, the Final EIR, and other documents and materials that constitute the record of proceedings.

Based on the analysis provided in the Final EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to traffic.

Accordingly, the City adopts this Statement of Overriding Considerations. Having

(i) adopted all feasible mitigation measures;

(ii) determined that Alternatives 1 through 4 would not meet the Project objectives to the same degree as the Project, as discussed above in Section VII;

(iii) determined that Alternative 2 would not avoid any significant and unavoidable impacts from the Project and would undermine economic considerations of the Project;

(iv) recognized the significant and unavoidable impacts; and

(v) balanced the benefits of the Project against its significant and unavoidable impacts, the City hereby finds that each of the benefits outweigh and override the significant unavoidable impacts for the reasons stated below.

The City further finds and determines that:

a) All significant environmental impacts that can be feasibly avoided have been eliminated, or substantially lessened through implementation of the project design features and/or mitigation measures; and

b) Based on the Final EIR, the Statement of Overriding Considerations herein, and other documents and information in the record with respect to the construction and operation of the project, all remaining unavoidable significant impacts, as set forth in these findings, are overridden by the benefits of the project as described in the Statement of Overriding Considerations for the construction and operation of the project and implementing actions.

The below stated reasons summarize the benefits, goals, and objectives of the Project and provide the rationale for the benefits of the Project. Any one of the overriding considerations of economic, social, aesthetic and environmental benefits listed below would be sufficient to outweigh the adverse environmental impacts of the Project and justify its approval.

1. Location of a high-density mixed-use development on an under-utilized site in a transit priority area, a high-quality transit corridor, and that is in proximity to several transit options (Metro bus lines 18, 60, and 62 are within ¼ mile of the Site).

2. Development of new residential units, with 11% set aside as Restricted Affordable, that contribute to the Mayor's housing goal of building 100,000 new housing units by 2021, as well as the policies of SCAG's 2016-2040 RTP/SCS and the City's General Plan Framework, Health and Wellness, and Housing Elements.

3. Promoting and supporting community interaction on and around the Project Site for residents, workers, and visitors through the introduction of new amenities.

4. Furthering the growth of the City's economic base through the introduction of an economically viable project that includes revenue generating commercial activities, tax revenues, and other fiscal benefits for the community. The Project is estimated to create 662 full-time long-term jobs including 543 office jobs (section IV.I, Population and Housing). Additionally, projects construction will create more than 100 jobs for every day of construction.

5. Supporting the revitalization of the nearby Arts District by contributing to the active environment through the addition of residences, office, and commercial uses.

6. Development of an architecturally recognizable building that furthers the development of Los Angeles and is accessible by public transit to both local residents and visitors of the city.

7. Development of different types of new housing units, including live/work units in a variety of floor plan layouts and bedroom types to help meet the demand for high-density housing for Downtown employees in the Central City North Community Plan Area.

8. Addressing urban run-off impacts for a site proximate to the LA River and reducing heat island impacts associated with surface parking.

PUBLIC HEARING AND COMMUNICATIONS

Public Hearing

A public hearing was held at City Hall for the proposed project entitlements on April 17, 2019 and was attended by approximately 20 individuals. At the public hearing, testimony was provided by the project applicant and one speaker, and a representative of the Central City Association.

Summary of Public Hearing Testimony

At the hearing, the project applicant presented the project features and explained the difference between a Collector Street Designation and the Industrial Street Designation, given the change of the pattern of development in the area and the anticipated changes in the DTLA 2040 Plan. The applicant highlighted existing improvements that prohibit the city from gaining an additional lane capacity, the streets are dead end streets and the lack of use of semi-trucks along the project streets. The Applicant explained the project's compatibility with the City's goals for economic development, housing and land use. The project architect presented the architectural features of the project. A representative of the Central City Association spoke in favor of the project.

Support

- Exciting project, uses are well balanced, with over 50% as commercial uses that will create new job opportunities and provide affordable housing.
- Contemporary industrial character design of project blends in seamlessly with the area.
- Project helps reduce vehicle miles traveled.
- Project promotes walkability and connectivity with internal paseos

No one spoke against the project.

Communications Received

Additional public comments regarding the Draft Environmental Impact Report (EIR) for the project are addressed in the Final EIR:

https://planning.lacity.org/eir/2110_Bay_Street/FEIR/FEIR%202110%20Bay%20Street%20Project.html

2110 BAY DEVELOPMENT

Los Angeles, CA
July 31, 2019

ALTA/ACSM LAND TITLE SURVEY

2110 BAY STREET AND 2141 SACRAMENTO STREET
LOS ANGELES, CALIFORNIA

FLOOD NOTE:

ZONE – "X" PER FEDERAL EMERGENCY MANAGEMENT AGENCY
MAP NO. 06037C 1636 F DATED SEPTEMBER 26, 2008.

ZONE "X" DENOTES AREAS SUBJECT TO MINIMAL FLOODING

THE ABOVE STATEMENT IS FOR INFORMATION ONLY AND THIS SURVEYOR ASSUMES NO LIABILITY FOR THE CORRECTNESS OF THE CITED MAP(S). IN ADDITION, THE ABOVE STATEMENT DOES NOT REPRESENT THIS SURVEYOR'S OPINION OF THE PROBABILITY OF FLOODING.

UTILITY NOTE:

BASED ON VISUAL OBSERVATION, THE SUBJECT SITE IS SERVICED BY ALL THE NECESSARY UTILITIES REQUIRED TO MAINTAIN NORMAL OPERATION. THE SURVEY WOULD NOT SHOW UTILITIES COVERED BY CARS/TRUCKS OR RECENTLY PAVED ASPHALT/CONCRETE or OVERGROWN BRUSH, TREE'S AND SHRUBS.

BUILDING NOTE:

BUILDING

(A) — (FOOTPRINT AREA = 13,057 SQUARE FEET)
1 STORY CORRUGATED METAL
(HEIGHT = 17'±)

STATEMENT OF POSSIBLE ENCROACHMENTS:

NOTE: THE FOLLOWING IS A LISTING OF OBSERVED IMPROVEMENTS THAT CROSS PROPERTY LINES, STATEMENT OF OWNERSHIP OR POSSESSION IS NEITHER IMPLIED NOR THE INTENT OF THIS LISTING.

(A) — BUILDING LIES 0.2' WESTERLY OF PROPERTY LINE.

(B) — OVERHANG LIES 9.0' NORTHERLY AND 0.2' SOUTHERLY OF PROPERTY LINE.

BASIS OF BEARINGS:

THE BEARING OF N 89°25'43" W ALONG THE CENTERLINE OF BAY STREET PER RECORD OF SURVEY 18771, RSB 269/61 IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, WAS USED AS THE BASIS OF BEARINGS FOR THIS SURVEY.

LAND AREA:

77,432 SQUARE FEET
1.78 ACRES

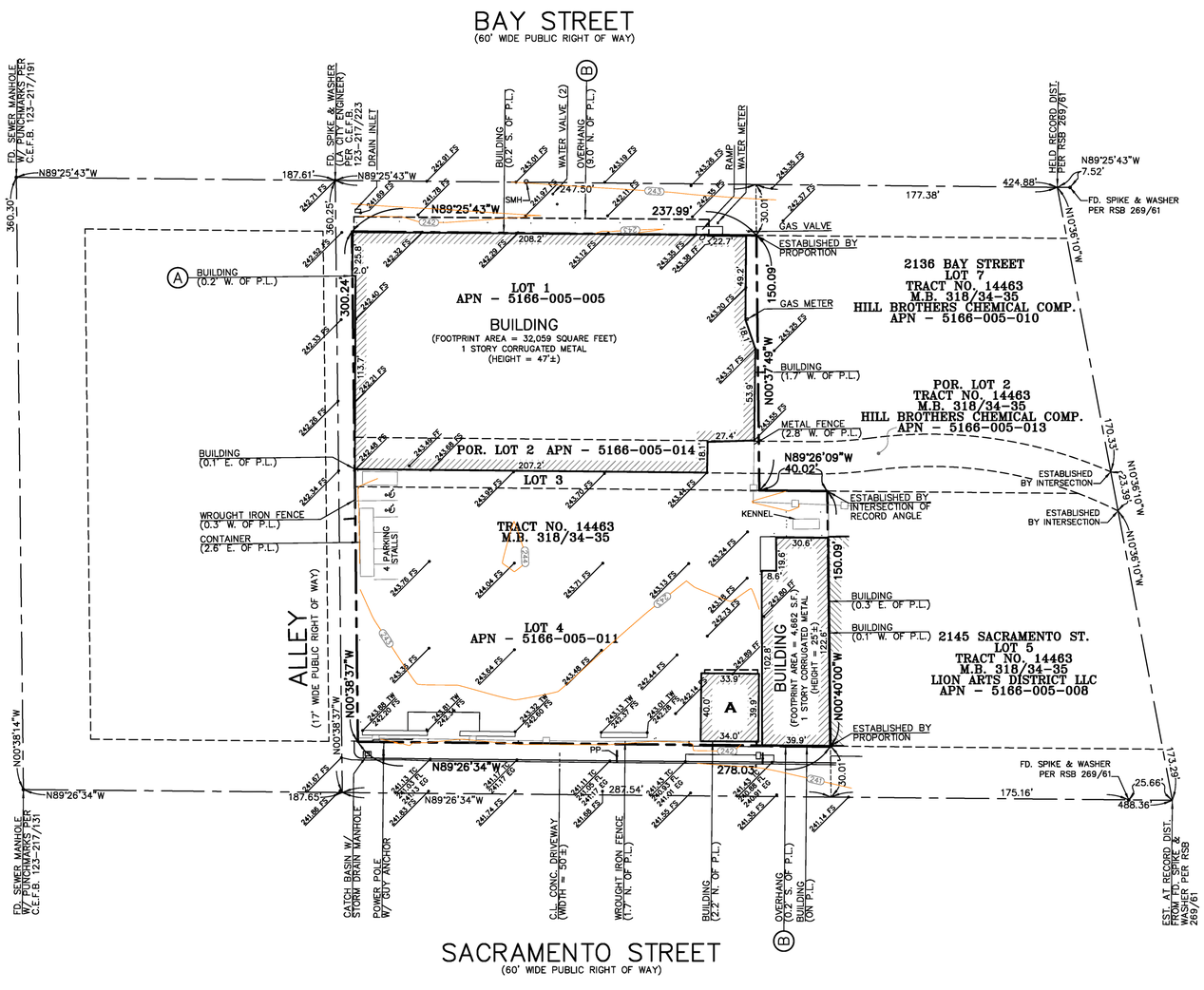
N

W E

S

40' 0' 40' 80'

SCALE: 1" = 40'



SITE RESTRICTIONS:

SETBACKS:

FRONT – NONE
STREET SIDE – NONE
SIDE – NONE
REAR – NONE
HEIGHT – NONE

ZONE – M3-1-RIO (HEAVY INDUSTRIAL)

FLOOR AREA RATIO – 10:1
PARKING REQUIREMENT – 1 STALL PER 500 S.F. (INTERIOR)

THE INTERIOR SQUARE FOOTAGE CANNOT BE DETERMINED FROM THE EXTERIOR FOOTPRINT OF THE BUILDING(S); THEREFORE THE REQUIRED AMOUNT OF PARKING STALLS HAS NOT BEEN SHOWN HEREON.

ALL SITE RESTRICTIONS WERE OBTAINED PER THE CITY OF LOS ANGELES (PLANNING DEPARTMENT). ANY QUESTIONS REGARDING ZONE DEFINITIONS OR INTERPRETATIONS SHOULD BE DIRECTED TO:

PHONE NUMBER – (213) 978-1275

*ZONING AND RESTRICTIONS SHOWN HEREON WERE OBTAINED BY A GENERAL REQUEST AT THE PUBLIC COUNTER OF THE ABOVE NAMED DEPARTMENT. NO REPRESENTATION IS MADE FOR THE ACCURACY OR COMPLETENESS OF SAID THIRD PARTY INFORMATION. THIS FIRM IS NOT AN EXPERT IN THE INTERPRETATION OF COMPLEX ZONING ORDINANCES, COMPLIANCE IS BEYOND THE SCOPE OF THIS SURVEY. ANY USER OF SAID INFORMATION MUST CONTACT THE LOCAL AGENCY DIRECTLY. THIS INFORMATION IS NOT PROVIDED FOR DESIGN PURPOSES.

PARKING SPACE TABLE	
TYPE OF SPACE	TOTAL EXISTING
STANDARD	4
HANDICAP	2
TOTAL	6

BENCHMARK:

CITY OF LOS ANGELES BENCHMARK
NO. 12-01180

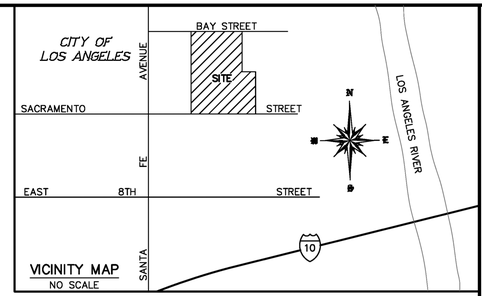
DESCRIPTION: WIRE SPIKE IN EAST CURB SANTA FE AVENUE; 25 FEET SOUTH OF BAY STREET

ELEVATION: 242.003

DATUM: NAVD88

LEGEND:

C.E.F.B. – CITY ENGINEER FIELD BOOK
DIST. – DISTANCE
E. – EAST
EG – EDGE OF GUTTER
EST. – ESTABLISHED
FF – FINSHED FLOOR
FL – FLOWLINE
FS – FINISHED SURFACE
N. – NORTH
POR. – PORTION
PP – POWER POLE
RSB – RECORD SURVEY BOOK
S. – SOUTH
TC – TOP OF CURB
W. – WEST



LEGAL DESCRIPTION:

REAL PROPERTY IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:

LOTS 1, 3 AND 4 AND THAT PORTION OF LOT 2 LYING WESTERLY OF THE SOUTHERLY PROLONGATION OF THE EASTERLY LINE OF SAID LOT 1; ALL IN TRACT 14463, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 318 PAGES 34 AND 35 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 5166-005-005 (AFFECTS LOT 1);
5166-005-014 (AFFECTS PORTION OF LOT 2) AND
5166-005-011 (AFFECTS LOTS 3 AND 4)

ITEMS CORRESPONDING TO SCHEDULE "B":

BY: FIRST AMERICAN TITLE COMPANY
777 SOUTH FIGUEROA STREET, SUITE 400
LOS ANGELES, CA 90017
(213) 271-1738

COMMITMENT NO.: NCS-706760-LA2
TITLE OFFICER: ESTER REYNOLDS
DATED: JANUARY 14, 2015

THE FOLLOWING ITEMS WERE FOUND IN SAID COMMITMENT AND ARE REFERENCED ON THIS MAP. COVENANTS, CONDITIONS, RESTRICTIONS, TERMS AGREEMENTS AND MATTERS LISTED HEREON CONTAIN NUMEROUS ITEMS THAT AFFECT THE SUBJECT PROPERTY, CONTENTS MUST BE REVIEWED TO DISCERN SPECIFICS.

(6) — WATER RIGHTS, CLAIMS OR TITLE TO WATER, WHETHER OR NOT DISCLOSED BY THE PUBLIC RECORDS. THE EXTENT TO WHICH THIS ITEM AFFECTS THE SUBJECT PROPERTY CAN NOT BE DETERMINED FROM THE TITLE REPORT OR DOCUMENTS PROVIDED AND IS NOT PLOTTED HEREON.

ITEMS #'S SHOWN HEREON ARE STATED AS EXCEPTIONS ON ABOVE REFERENCED COMMITMENT. NO RESPONSIBILITY FOR THE COMPLETENESS, ACCURACY, OR CONTENT OF SAID REPORT IS ASSUMED BY THIS MAP.

SURVEY NOTES:

-THIS ALTA/ACSM LAND TITLE SURVEY IS FOR TITLE INSURANCE PURPOSES ONLY, NOT TO BE USED FOR CONSTRUCTION, DESIGN OR ENGINEERING FOR FUTURE DEVELOPMENT OF SITE (PER TERMS AND CONDITIONS OF JRN CIVIL ENGINEERS CONTRACT WITH CLIENT)
-THERE WERE NO MONUMENTS FOUND OR SET AT THE PROPERTY LINE CORNERS UNLESS OTHERWISE NOTED.
-THE INFORMATION COURSES AND DISTANCES SHOWN ON THIS SURVEY PRINT ARE TRUE AND CORRECT AND ACCURATELY REPRESENT THE BOUNDARIES AND AREA OF THE PREMISES.
-THERE IS NO VISIBLE EVIDENCE THAT THE SITE WAS USED FOR AS A SUMP, DUMP OR SANITARY LANDFILL.
-THERE IS NO VISIBLE EVIDENCE OF CEMETERIES ON SUBJECT PROPERTY.
-ALL MEASURED AND RECORDED DIMENSIONS ARE THE SAME UNLESS NOTED OTHERWISE.
-AT THE TIME OF SURVEY NO EVIDENCE OF RECENT EARTH MOVING WORK, BUILDING CONSTRUCTION OR ADDITIONS WERE OBSERVED.
-NO RECENT CHANGES IN STREET RIGHTS-OF-WAY WERE OBSERVED AT THE TIME OF SURVEY.
-THIS SURVEY HAS BEEN PREPARED FOR TITLE INSURANCE PURPOSES ONLY. THIS SURVEY DOES NOT CONTAIN SUFFICIENT DETAIL FOR DESIGN PURPOSES. THE BOUNDARY DATA AND TITLE MATTERS AS SHOWN HEREON HAVE BEEN DEVELOPED FROM THE REFERENCED TITLE REPORT, ONLY.
-THE RELATIVE POSITIONAL ACCURACY OF CALLED OUT IMPROVEMENTS SHOWN ON THE SURVEY IS WITHIN +/- 0.1' OF THEIR ACTUAL LOCATIONS.
-UNLESS THIS PLAN HAS THE SEAL AND SIGNATURE OF THE SURVEYOR AND/OR ENGINEER RESPONSIBLE FOR ITS PREPARATION, THIS IS NOT AN AUTHENTIC COPY OF THE ORIGINAL SURVEY AND SHALL NOT BE DEEMED RELIABLE.
-COVENANTS, CONDITIONS, RESTRICTIONS, TERMS AGREEMENTS AND MATTERS LISTED HEREON CONTAIN NUMEROUS ITEMS THAT AFFECT THE SUBJECT PROPERTY, CONTENTS MUST BE REVIEWED TO DISCERN SPECIFICS.
-JRN CIVIL ENGINEERS ASSUMES NO LIABILITY FOR THE ACCURACY OR COMPLETENESS OF ANY THIRD PARTY INFORMATION REFERENCED OR REPRESENTED HEREON, ANY OF SAID INFORMATION SHOWN HEREON HAS BEEN PROVIDED FOR INFORMATIONAL PURPOSES ONLY.
-AS OUTLINED IN SECTION 8770.6 OF THE BUSINESS AND PROFFESIONS CODE "THE USE OF THE WORD "CERTIFY" OR "CERTIFICATION" BY A LICENSED LAND SURVEYOR OR REGISTERED CIVIL ENGINEER IN THE PRACTICE OF PROFESSIONAL ENGINEERING OR LAND SURVEYING OR THE PREPARATION OF MAPS, PLATS, REPORTS, DESCRIPTIONS, OR OTHER SURVEYING DOCUMENTS ONLY CONSTITUTES AN EXPRESSION OF PROFESSIONAL OPINION REGARDING THOSE FACTS OR FINDINGS WHICH ARE THE SUBJECT OF THE CERTIFICATION, AND DOES NOT CONSTITUTE A WARRANTY OR GUARANTEE, EITHER EXPRESSED OR IMPLIED."

SURVEYOR'S CERTIFICATE:

TO: JADE ENTERPRISES, LLC, BAY CAPITAL FUND, LLC AND FIRST AMERICAN TITLE COMPANY

THIS IS TO CERTIFY THAT THIS MAP OR PLAT AND THE SURVEY ON WHICH IT IS BASED WERE MADE IN ACCORDANCE WITH THE 2011 MINIMUM STANDARD DETAIL REQUIREMENTS FOR ALTA/ACSM LAND TITLE SURVEYS, JOINTLY ESTABLISHED AND ADOPTED BY ALTA AND NSPS, AND INCLUDES ITEMS 2, 3, 4, 6, 7(A), 7(B)(1), 7(C), 8, 9, 11(A), 13, 14, 16, 17, AND 18 OF TABLE A THEREOF. THE FIELD WORK WAS COMPLETED ON MARCH 26, 2015.

LICENSED LAND SURVEYOR
DANIEL S. COOK
No. 4964
STATE OF CALIFORNIA

DANIEL S. COOK L.S. NO. 4964
EXP: 12/31/15

REVISIONS

JRN CIVIL ENGINEERS
232 AVENIDA FABRICANTE, SUITE 107
SAN CLEMENTE, CALIFORNIA 92672
(949) 248-4685 FAX (949) 248-4687

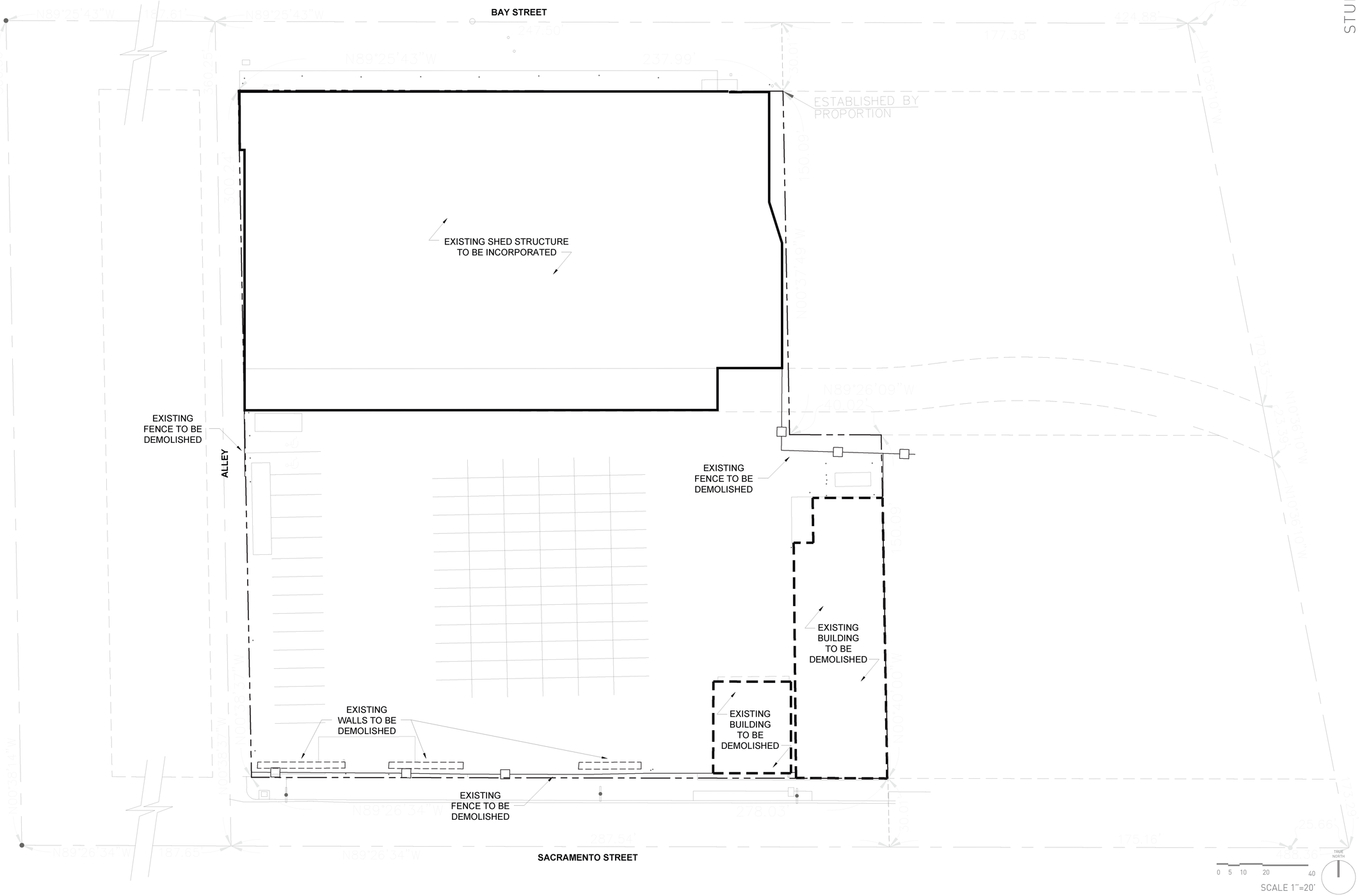
ALTA/ACSM LAND TITLE SURVEY

ADDRESS: 2110 BAY STREET AND 2141 SACRAMENTO STREET
LOS ANGELES, CALIFORNIA

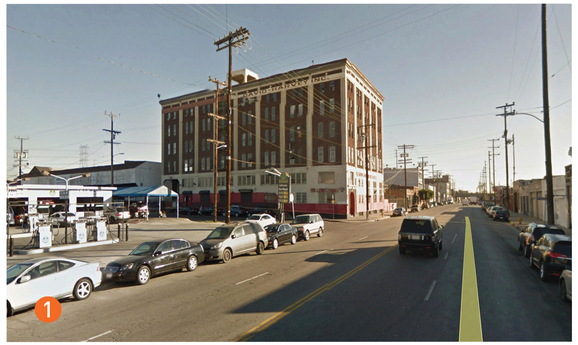
CLIENT: JADE ENTERPRISES, LLC

SHEET 1 OF 1
SCALE: 1" = 40'
DATE: 03/31/15
DRAWN BY: JFC
CHKD. BY: JRN
FILE NO. 14539

STUDIOONELEVEN
FOR REFERENCE ONLY



DEMO PLAN **BAY STREET**
7.31.2019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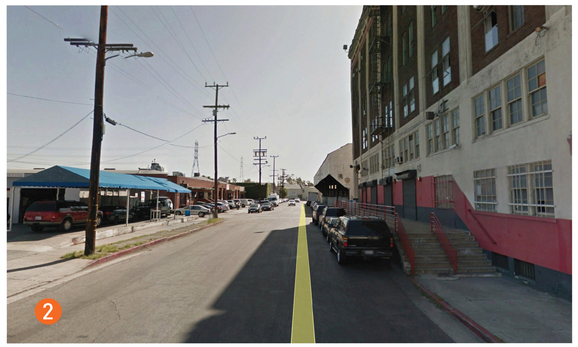
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3

1
(E)
SERVICE STATION
1 STORY
(E) MANUFACTURING
1 STORY
2
3
BAY ST.
4
SANTA FE AVE.
(E)
MANUFACTURING
6 STORY
PROJECT SITE
(E) MANUFACTURING
1 STORY
(E)
MANUFACTURING
1 STORY
(E) WHOLESALE
3 STORY
(E)
MANUFACTURING
1 STORY
LOS ANGELES RIVER
6
5
7
SACRAMENTO ST.
(E)
PROCESS-
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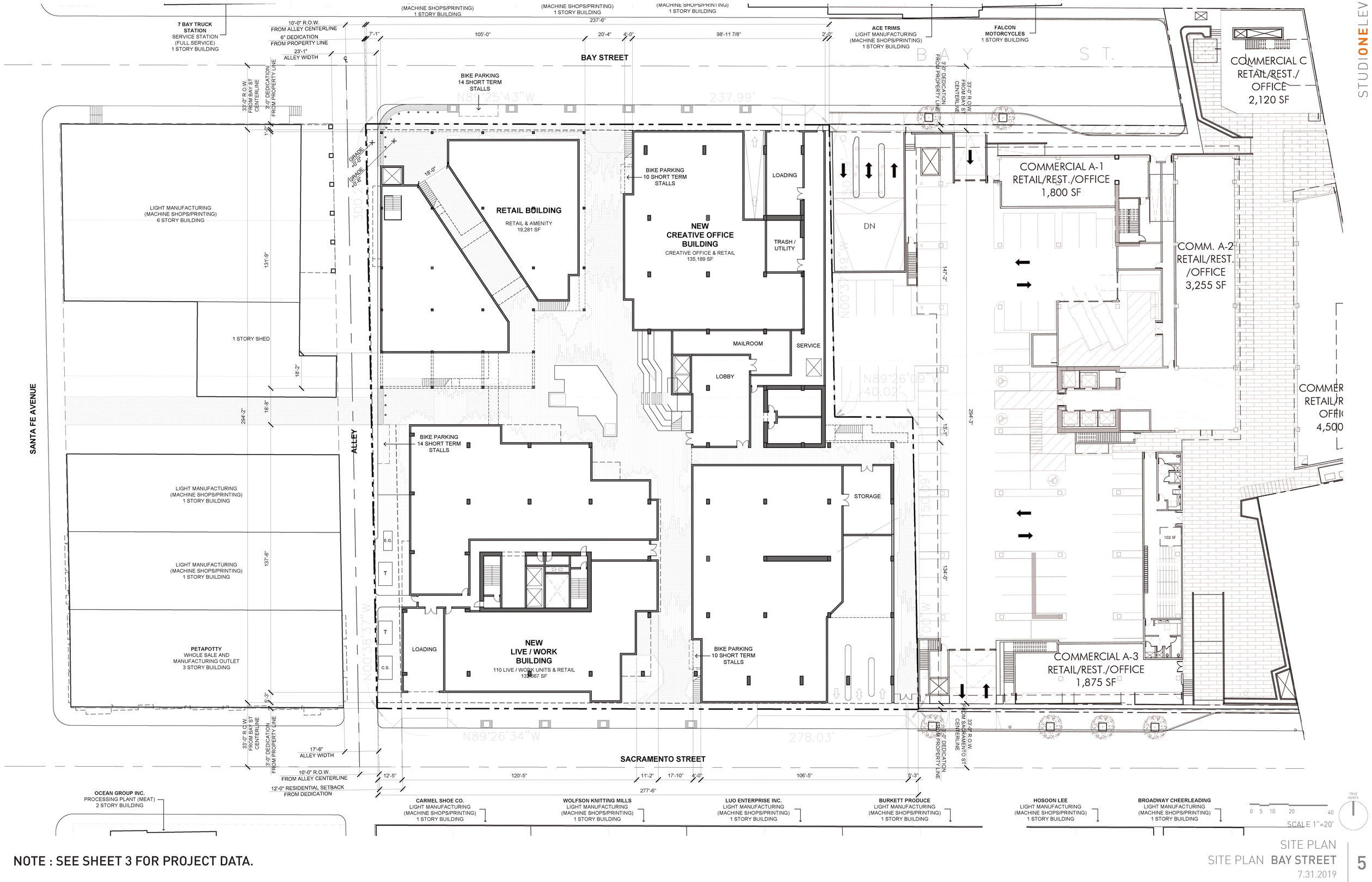
PLANT
2 STORY
(E) MANUFACTURING
1 STORY

4

5

6

7



NOTE : SEE SHEET 3 FOR PROJECT DATA.

PROJECT SUMMARY

Lot Area	**Square feet**	**Acres**	
Gross (to centerline)	92,909	2.13	
Existing Lot Area	77,432	1.78	
Area Lost to Dedications	1,696		
Post-Dedication Lot Area	75,736		
Area Added from 1/2 Ally: Post-Dedication Lot Area	78,679		
Density			
Permitted by CM Zone	98		
11% Very Low Income Set Aside	11		
Permitted with a Lot Area reduction equal to 10.5%	110		
Total Proposed	110		
Less than 3 habitable rooms (Studio)	67		
3 habitable rooms (1 bedroom)	34		
more than 3 habitable rooms	9		
Average unit size (sf)	947		
Floor Area			
Buildable area (Not the same as lot area)	74,023		
Permitted	**Square feet**	**FAR**	
Total Permitted by Existing Zone	111,035	1.5 :1	
Total Permitted by a HD 2	444,138	6.0 :1	
Proposed	287,137	3.9 :1	
Proposed			
Live/ Work	114,825		
Office	113,350		
Retail (including restaurant and gym)	50,848		
Covered Ancillary Space	8,114		
Total Proposed	287,137	3.9 :1	

Height	**Vertical Height (ft)**	**Ground Level (min ft)**	**Above Ground Level (min ft)**
Total Permitted by Existing Zone	Unlimited	Not specified	Not specified
Proposed Live/Work Building	139	16	min 10
Proposed Live/Work Elevator Tower	149		
Proposed Office Building	90.5	16	min 10
Proposed Office Elevator Tower	100.5		

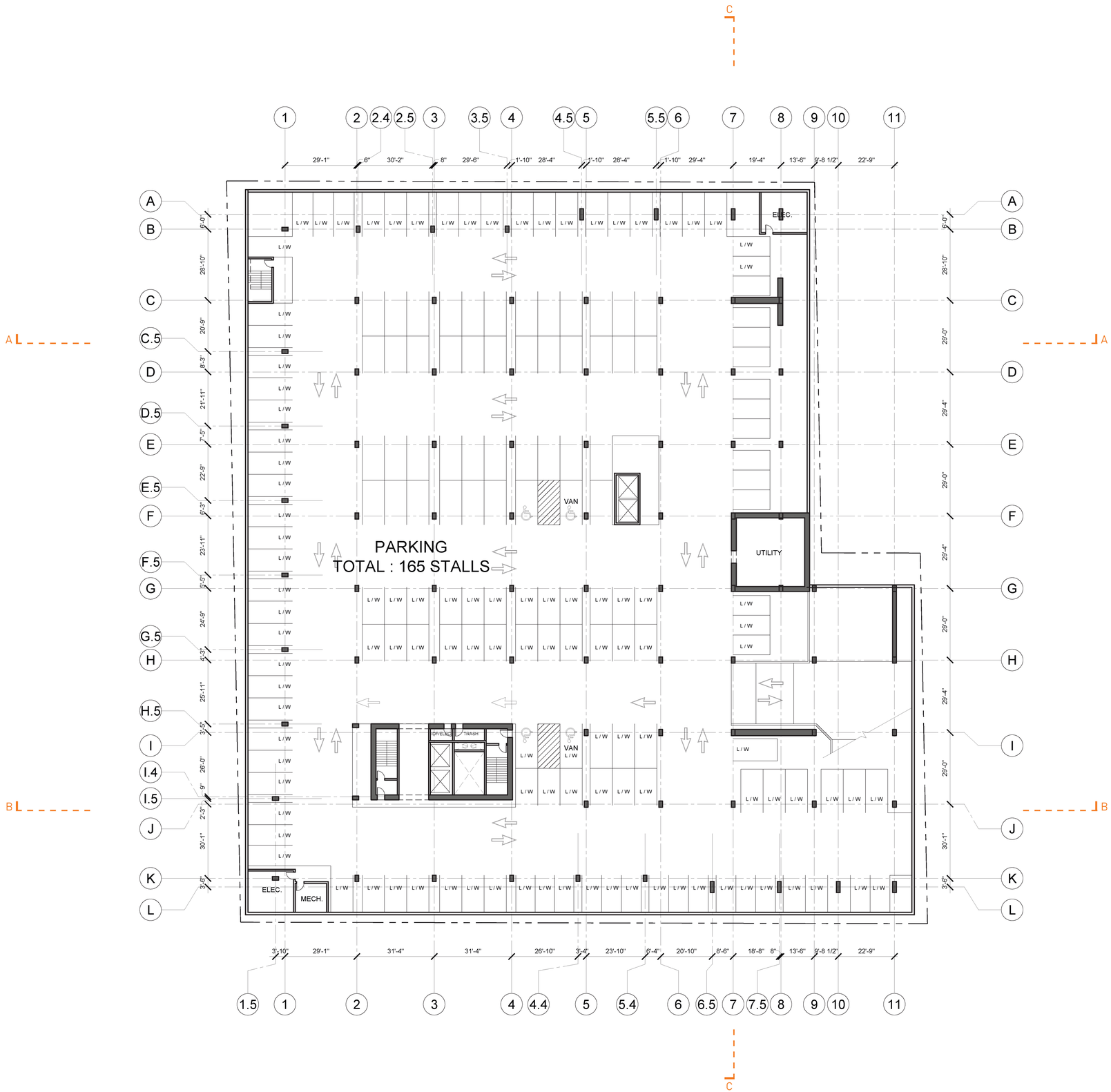
Open Space			
Required	SF per Unit	Units	Square feet
All Live Work Units	100	101	10,100
	125	9	1,125
			11,225
Required Open Space to be Landscaped (25%)			2,806
Maximum Interior Common Space			2,806
Proposed Residential Open Space	Hardscape	Planting	Total
Common			
11th Level Live/Work Deck	8,278	345	8,623
11th Level Community Room			2,012
Private			
Private Residential Balconies			5,500
Total Proposed Residential Open Space Provided	**8,278**	**345**	**16,135**
Non-Residential Open Space			
2nd Level Amenity Deck			8,114
1st Level Paseo	19,650	3,910	23,560
Private Creative Office Open Space			12,137
Private Residential Open Space exceeding code maximum			432
7th Level Restaurant Deck	4,200	205	4,405
Total Non Residential			48,648
Trees			
Required (1 per 4 units)		28	
Provided		28	

Auto Parking				
Required		Spaces/Unit	No. of Units	No. of Pkg Spaces
	Residential	1.00	101.0	101
		1.25	9.00	11
				112
		Spaces/SF	No. of SF	No. of Pkg Spaces
	Retail	2/1000	58,962	117
	Office	Spaces/SF	No. of SF	No. of Pkg Spaces
		2/1000	113,350	226
	Total Required			455
	Total Proposed			479
	Total EV Spaces Required	5% of all spaces		22.8
	Productive Space/Creative Office			226
	Retail			117
	Residential			112
	Surplus			24

Bike Parking				
Required		**Short Term**	**Short Term**	
	1 to 25	1 space / 10 units	2.0	Spaces
	26 to 100	1 space / 15 units	5.0	Spaces
	101 to 200	1 space / 20 units	0.5	Spaces
	201 to 331	1 space / 40 units	-	Spaces
	subtotal		8	Spaces
	Residential Dwelling Units	**Long Term Ratio**	**LongTerm Spaces**	
	1 to 25	1 space / 1 units	25.0	Spaces
	26 to 100	1 space / 1.5 units	50.0	Spaces
	101 to 200	1 space / 2 units	5.0	Spaces
	201 to 547	1 space / 4 units	-	Spaces
	subtotal		80	Spaces
	Retail/Commercial	**Short Term (1 per 2000 SF)**	**Long Term (1 per 2000 SF)**	**Total**
		29	29	58
	Creative Office	**Short Term (1 per 5000 SF)**	**Long Term (1 per 10,000 SF)**	**Total**
		11	23	34
	Total Required (Ord 185,480)	**48**	**132**	**180**
Proposed		**Short Term**	**Long Term**	**Total**
		48	132	180

Setbacks			
Required	**Front**	**Front**	**Side**
	0 Feet	0 Feet	12.5 Feet
Proposed	**Front**	**Front**	**Side**
	0 Feet	0 Feet	12.5 Feet

STUDIOONELEVEN



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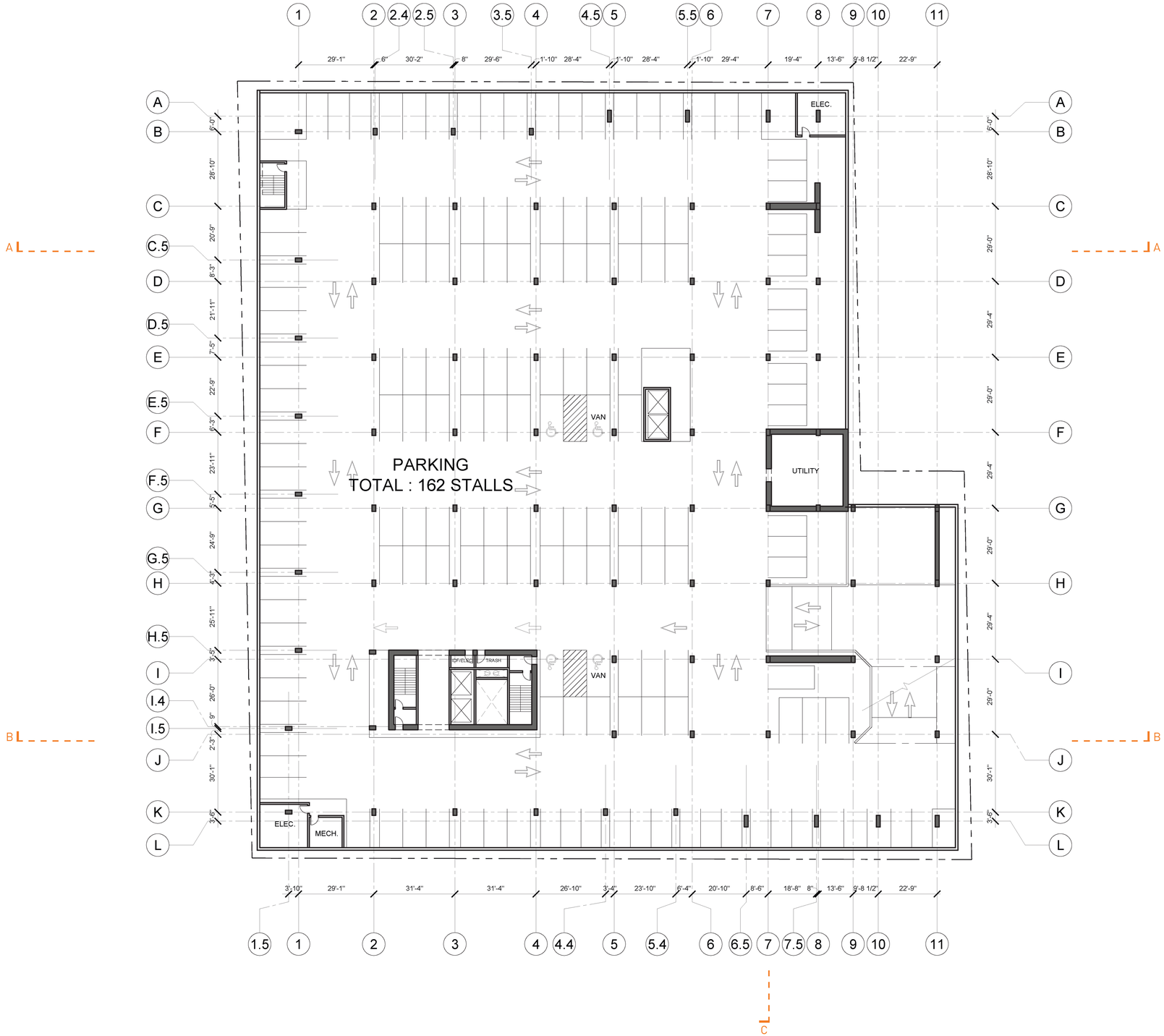
TRUE NORTH

P3
FLOOR PLANS **BAY STREET**
7.31.2019



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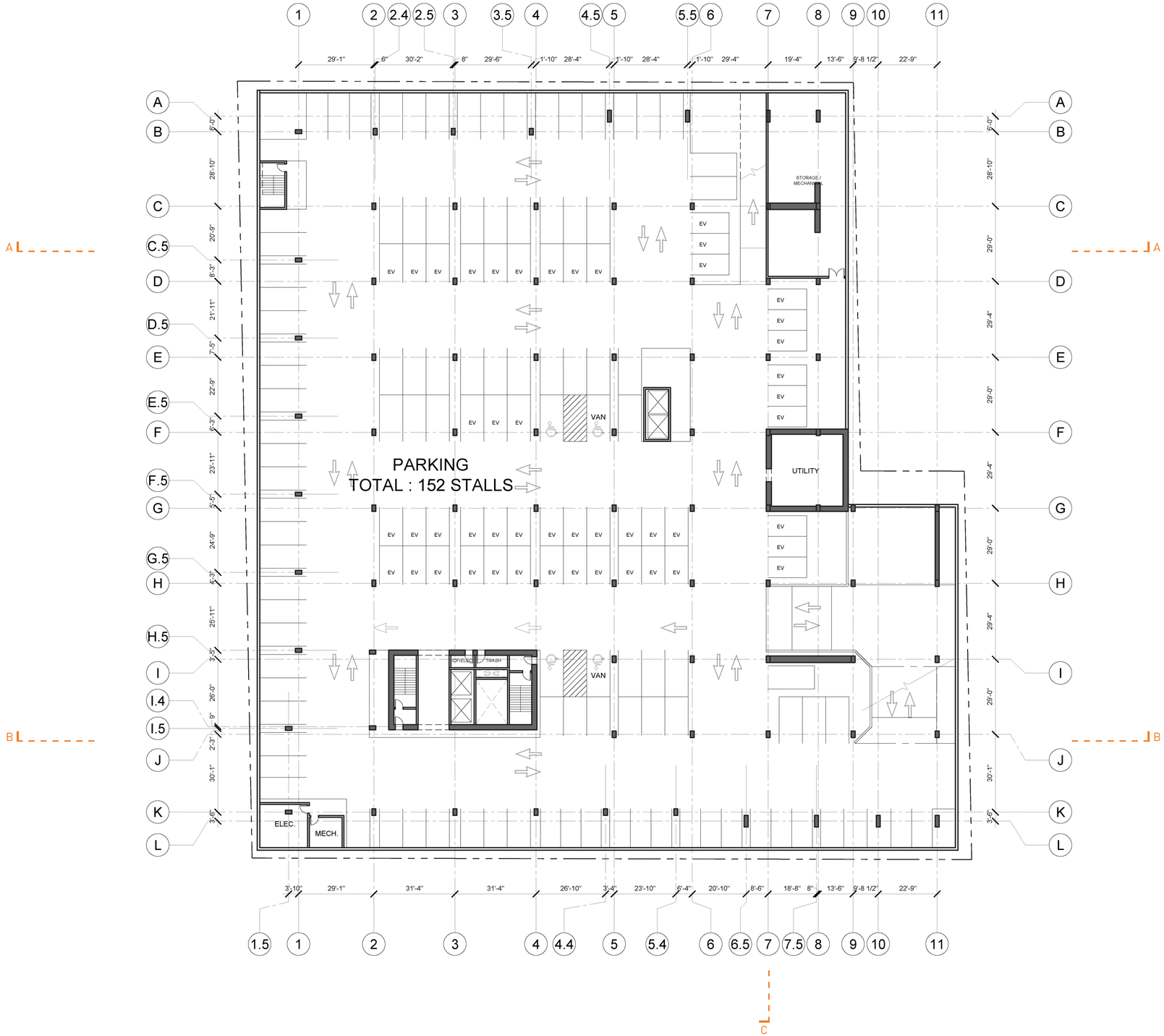

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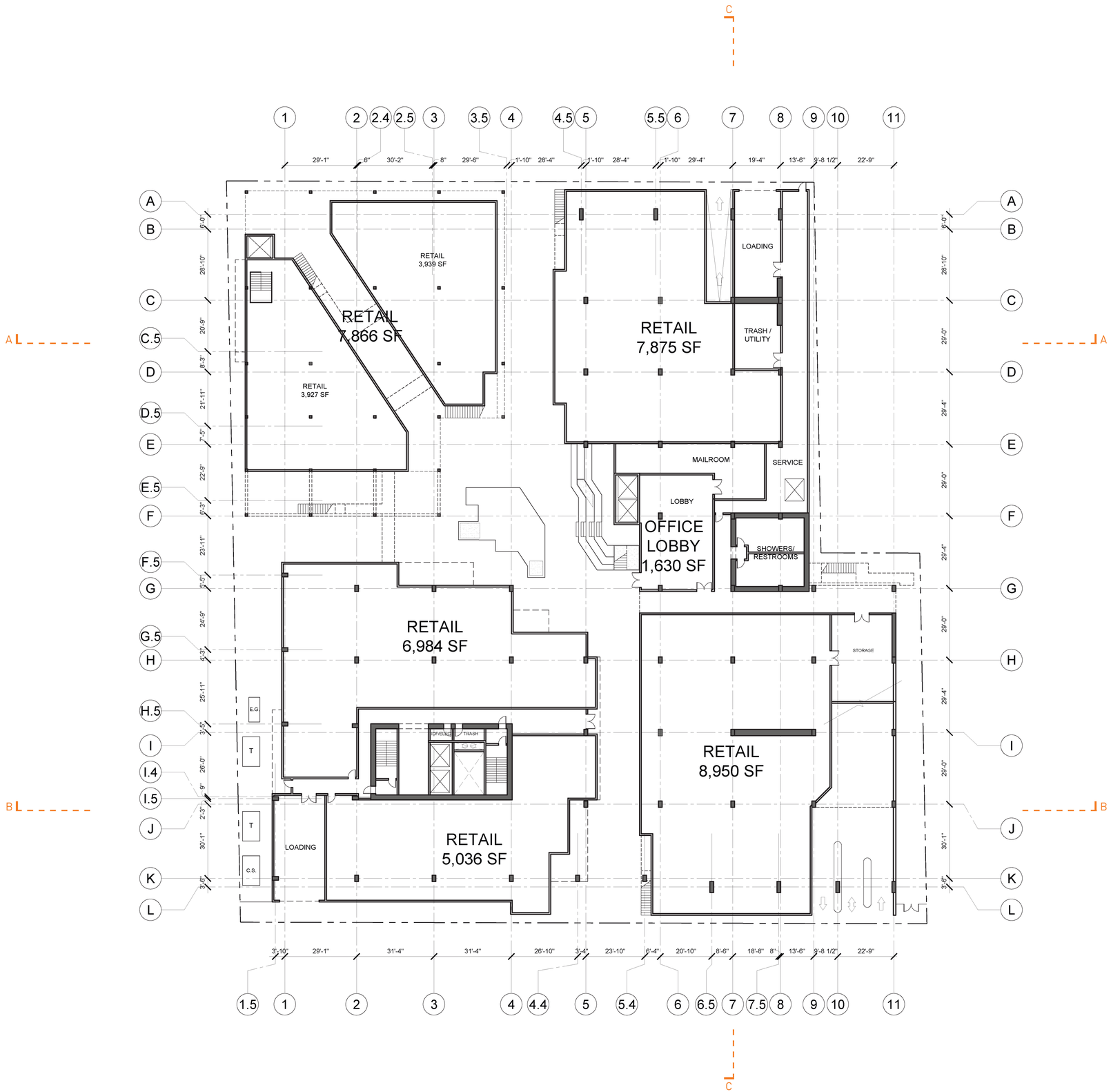

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L1
FLOOR PLANS **BAY STREET**
7.31.2019

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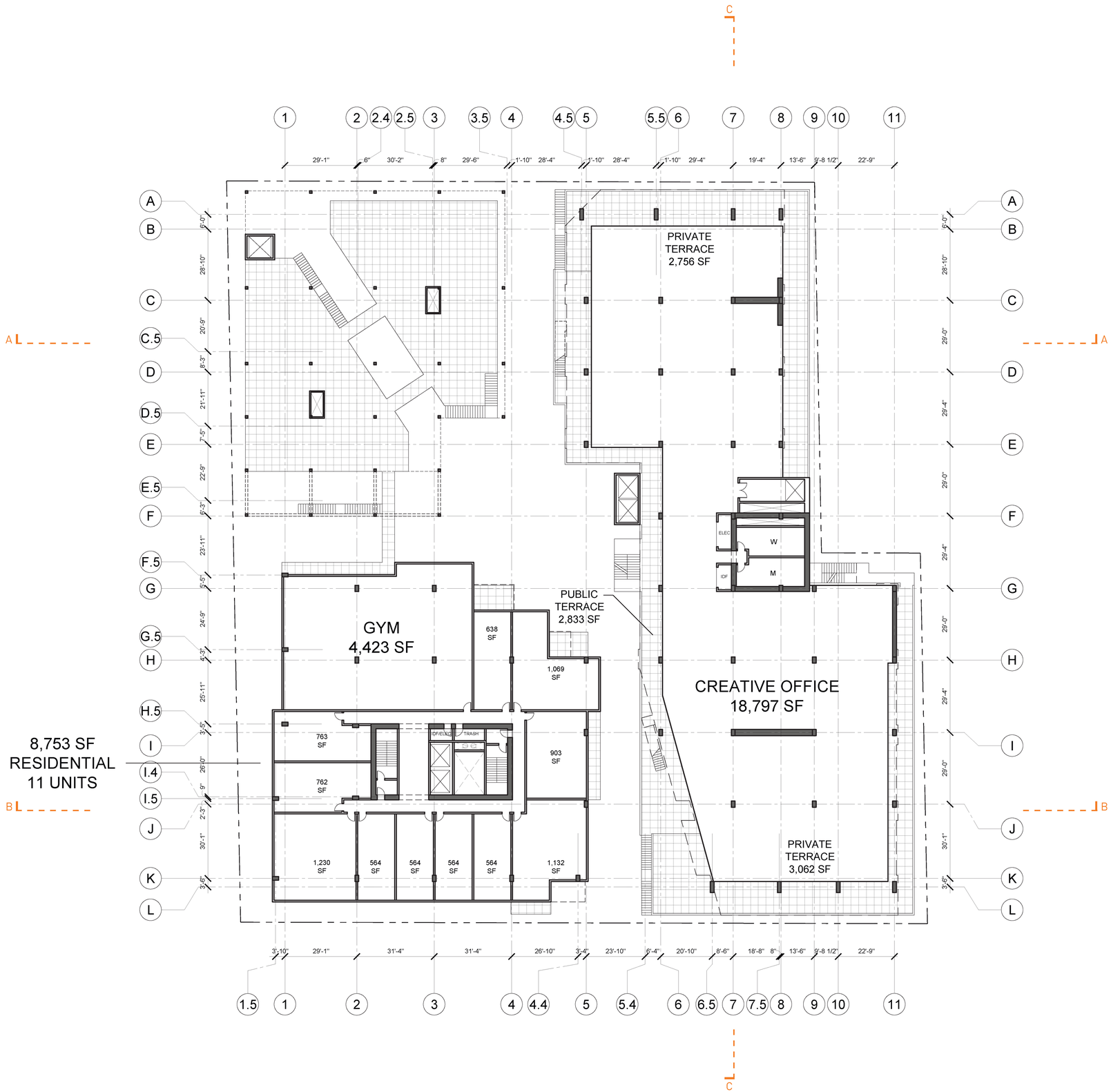

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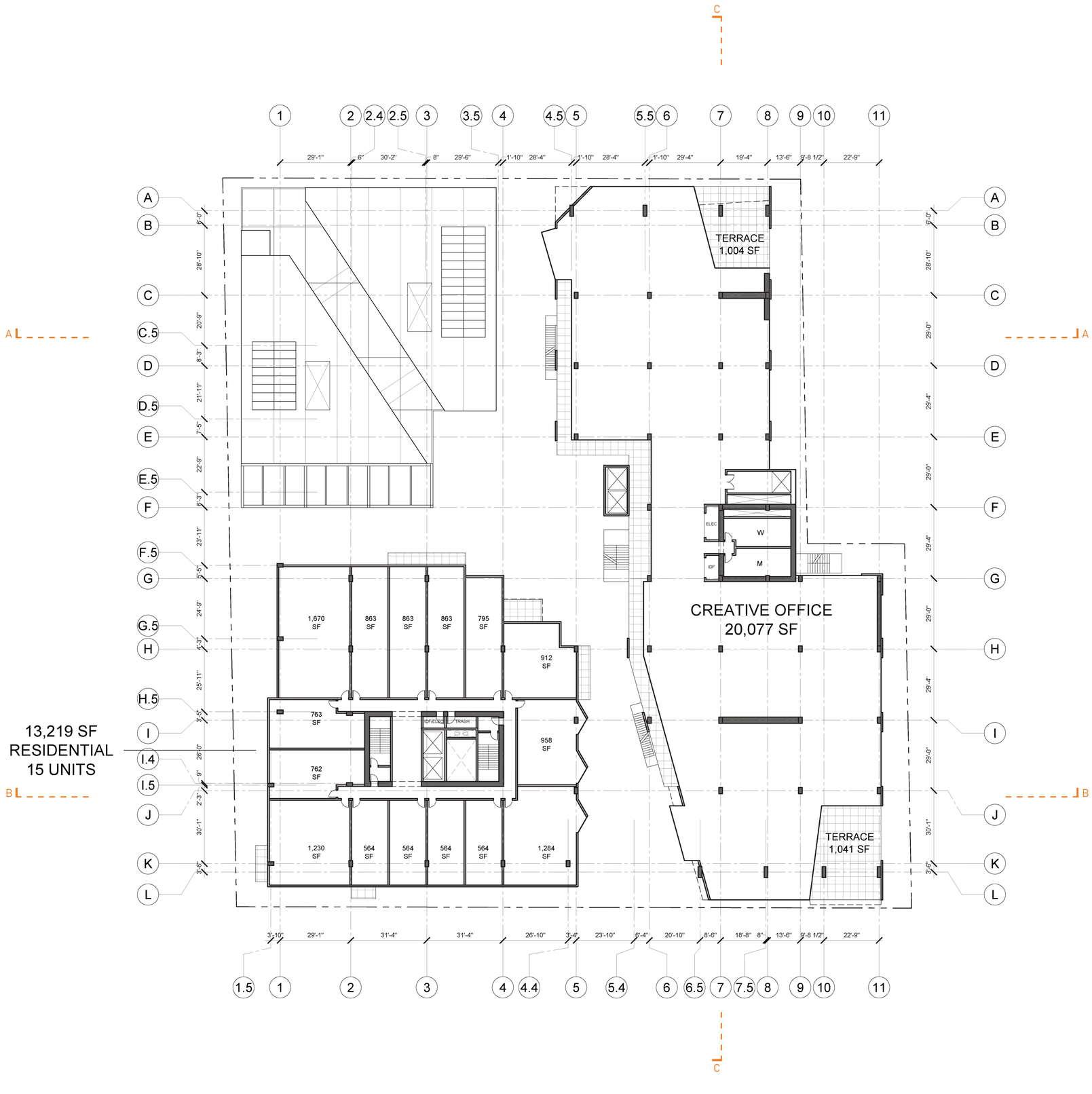
TRUE NORTH

L2

FLOOR PLANS **BAY STREET**

7.31.2019



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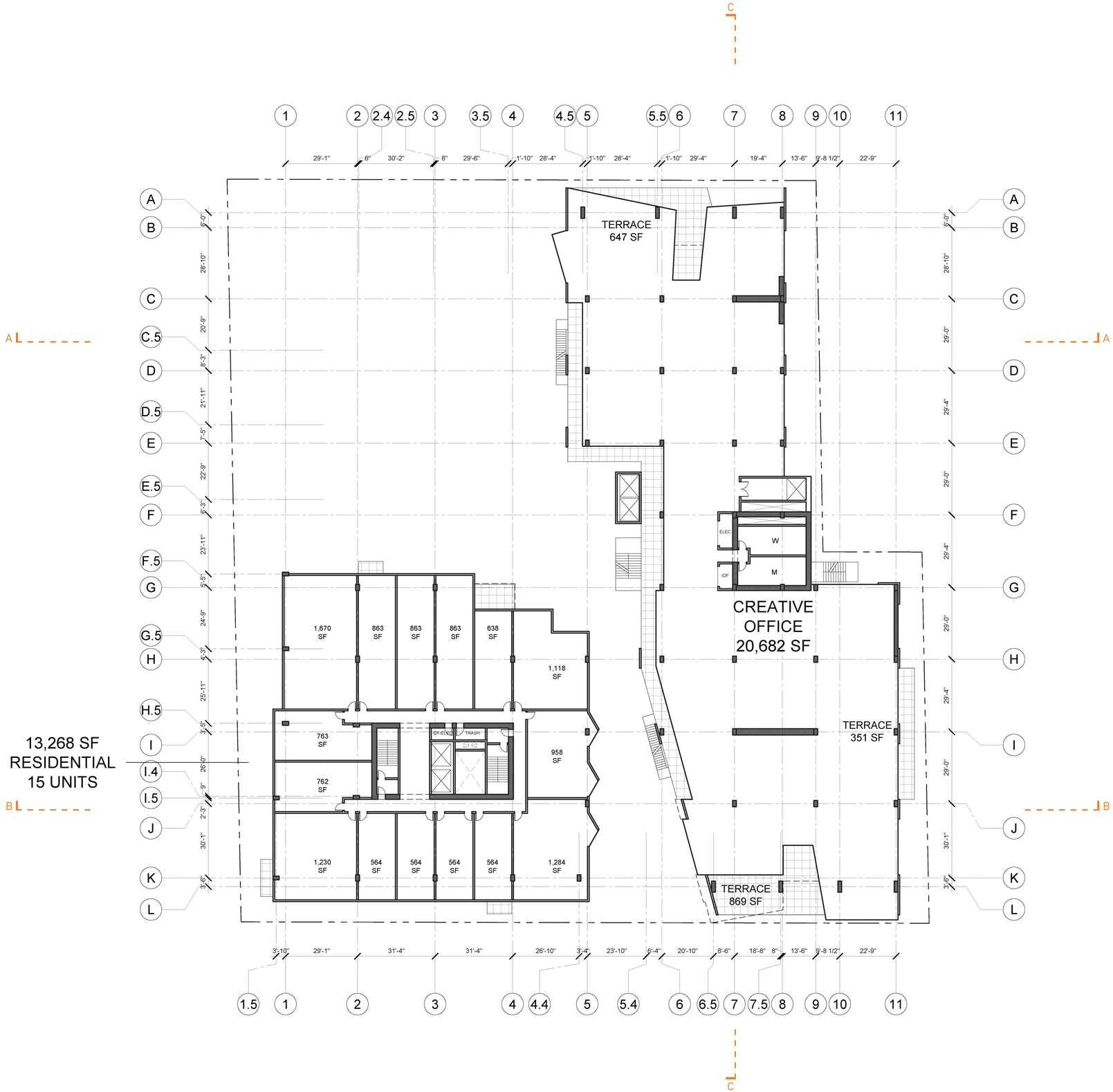

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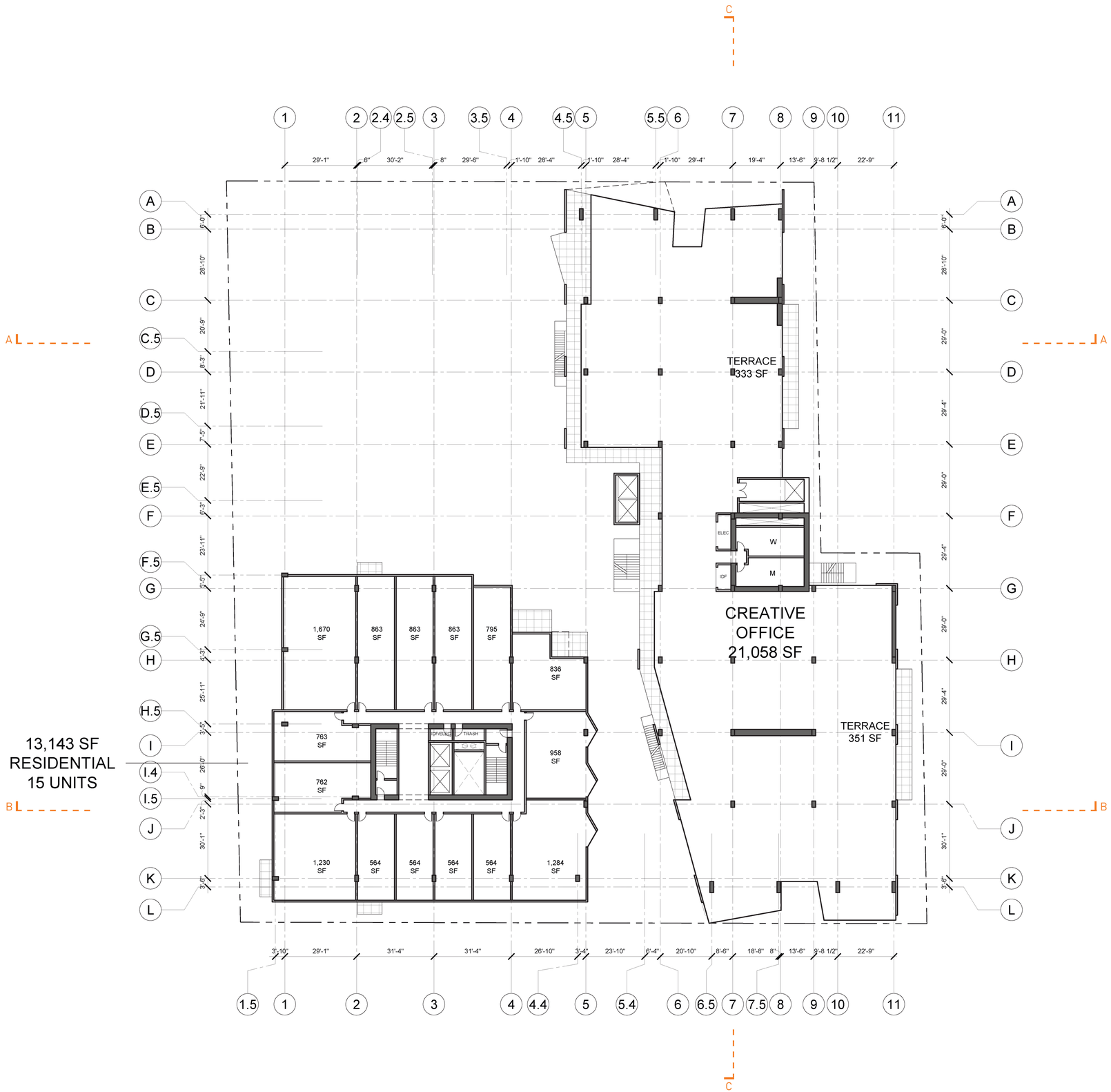

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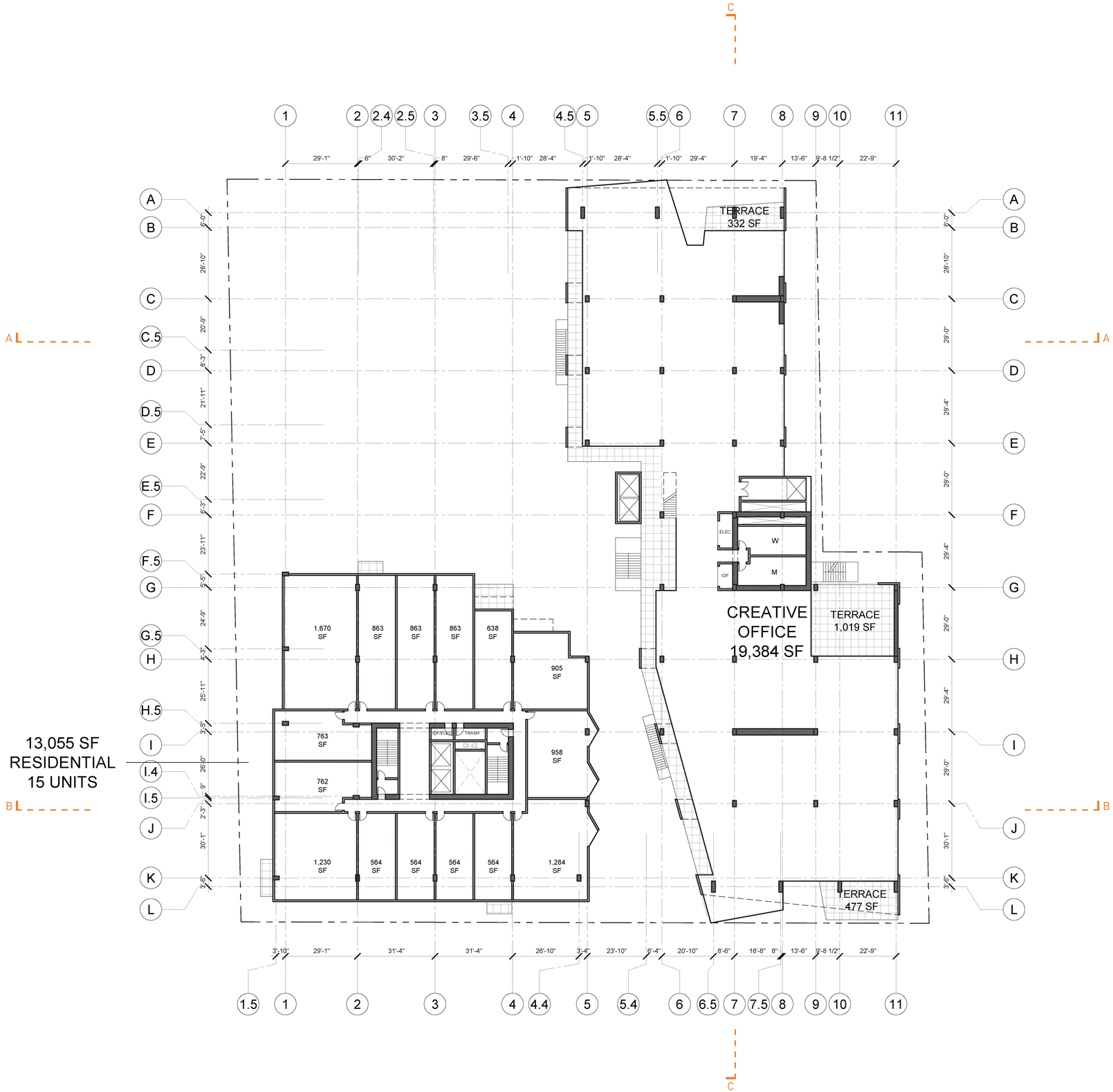
L5

FLOOR PLANS **BAY STREET**

7.31.2019



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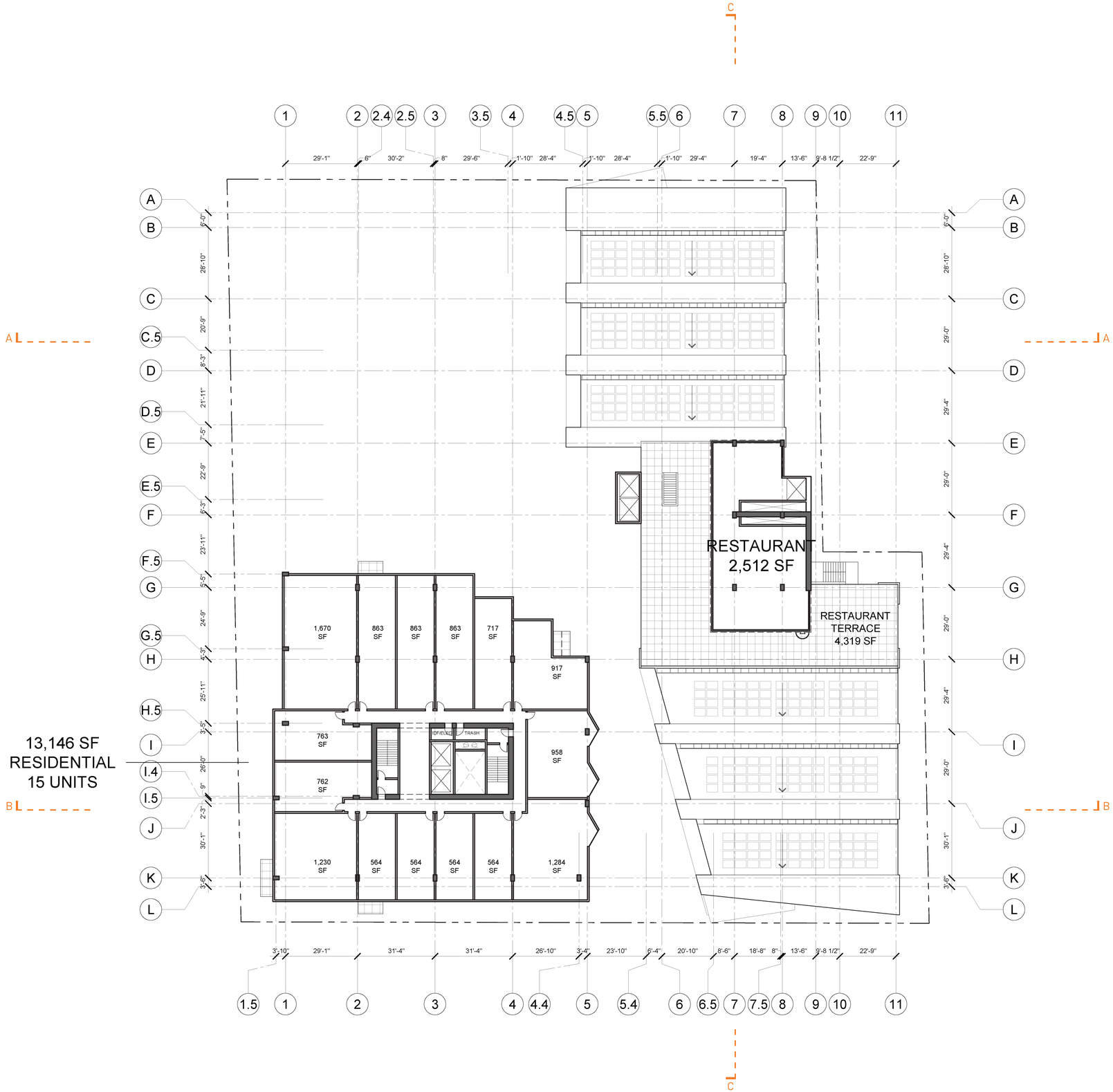

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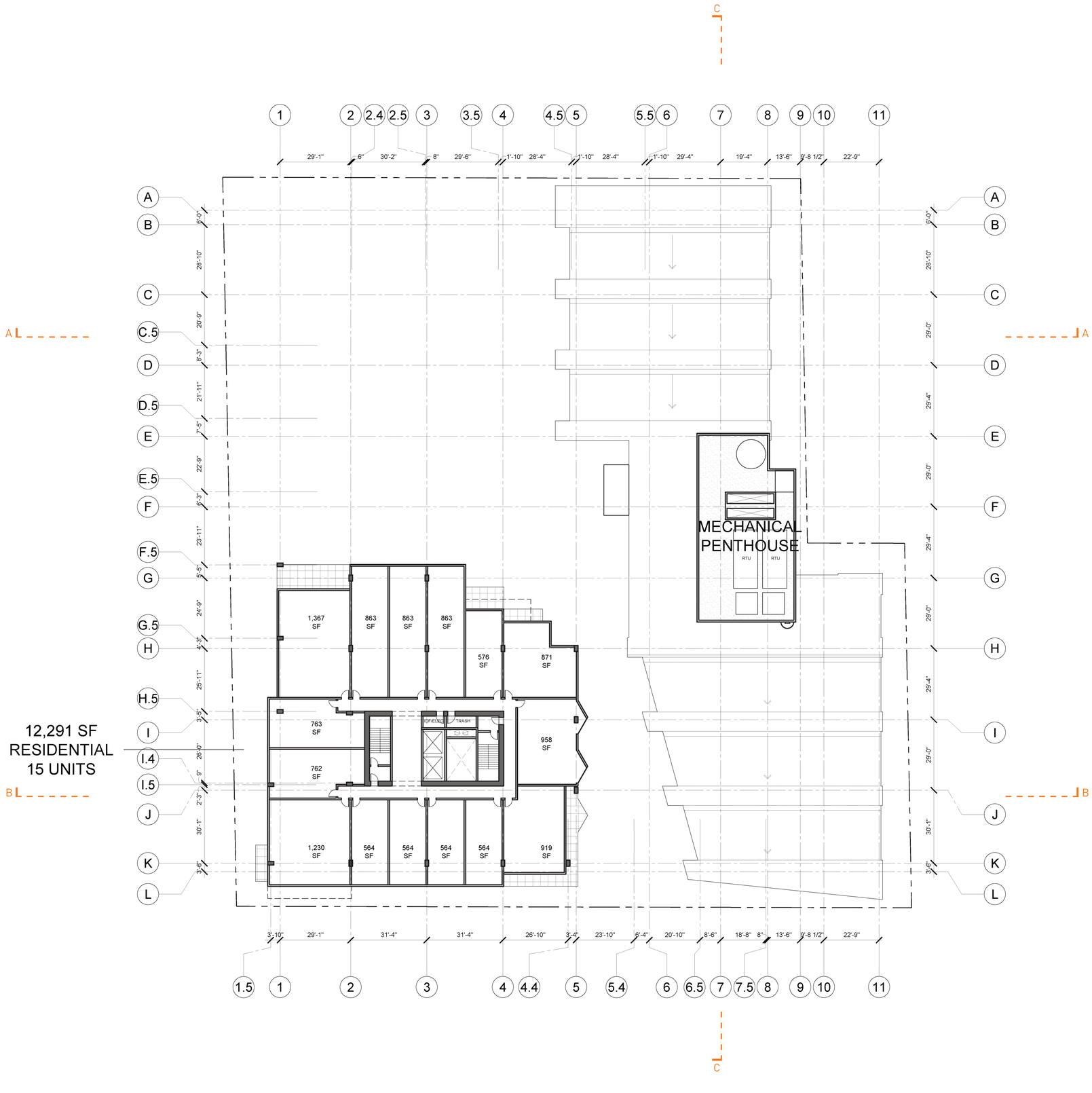

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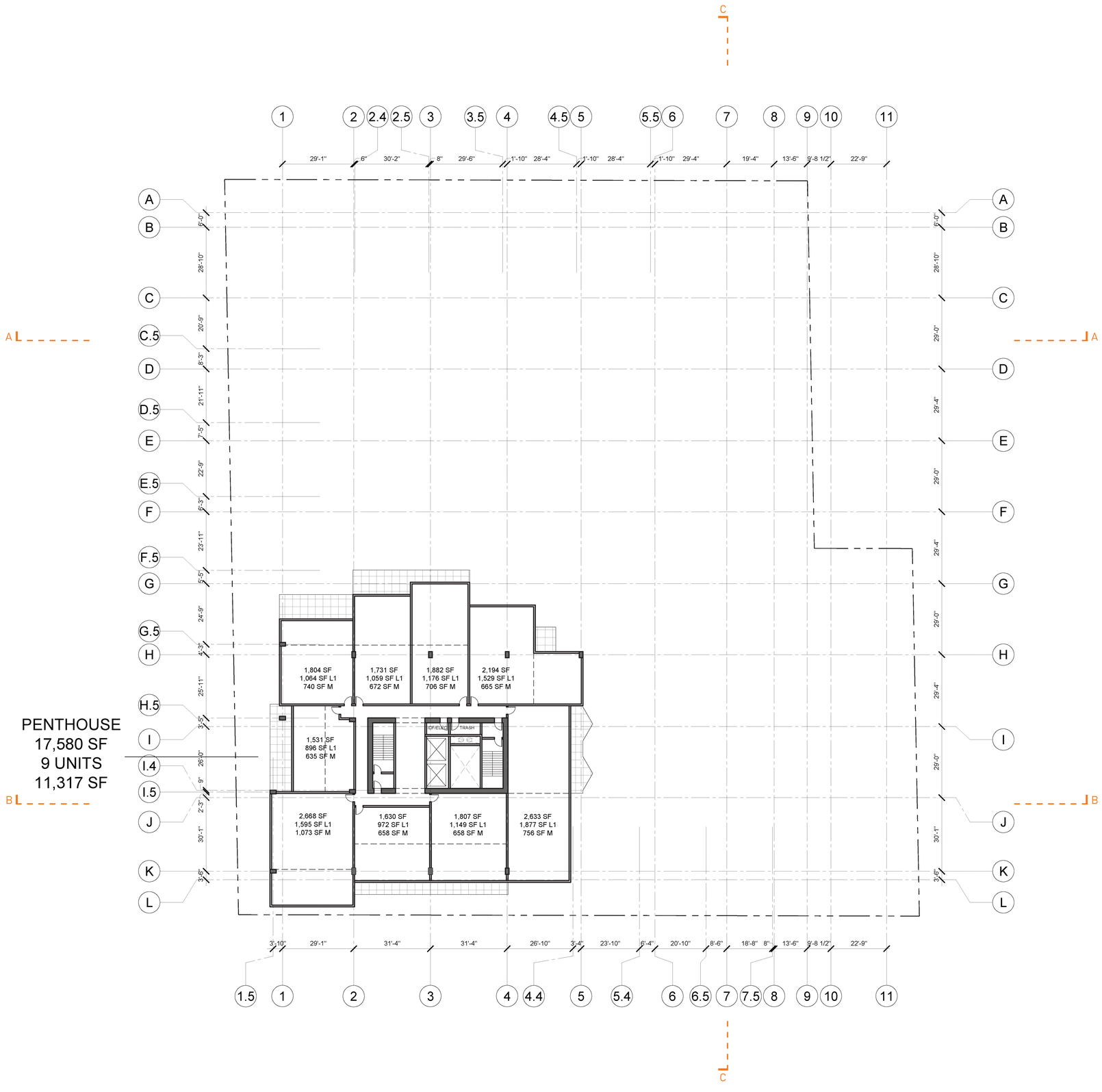
L8

FLOOR PLANS **BAY STREET**

7.31.2019



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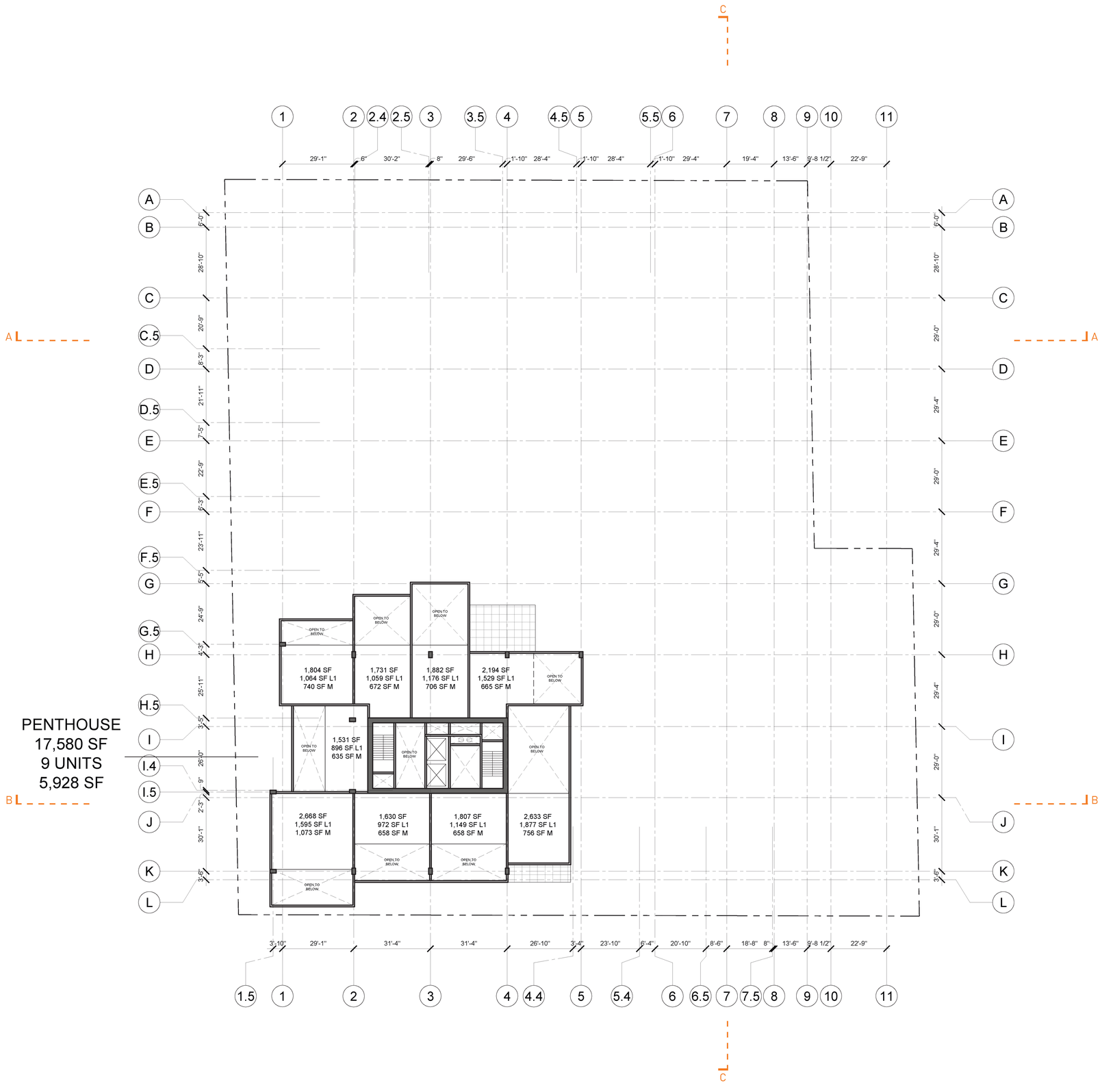

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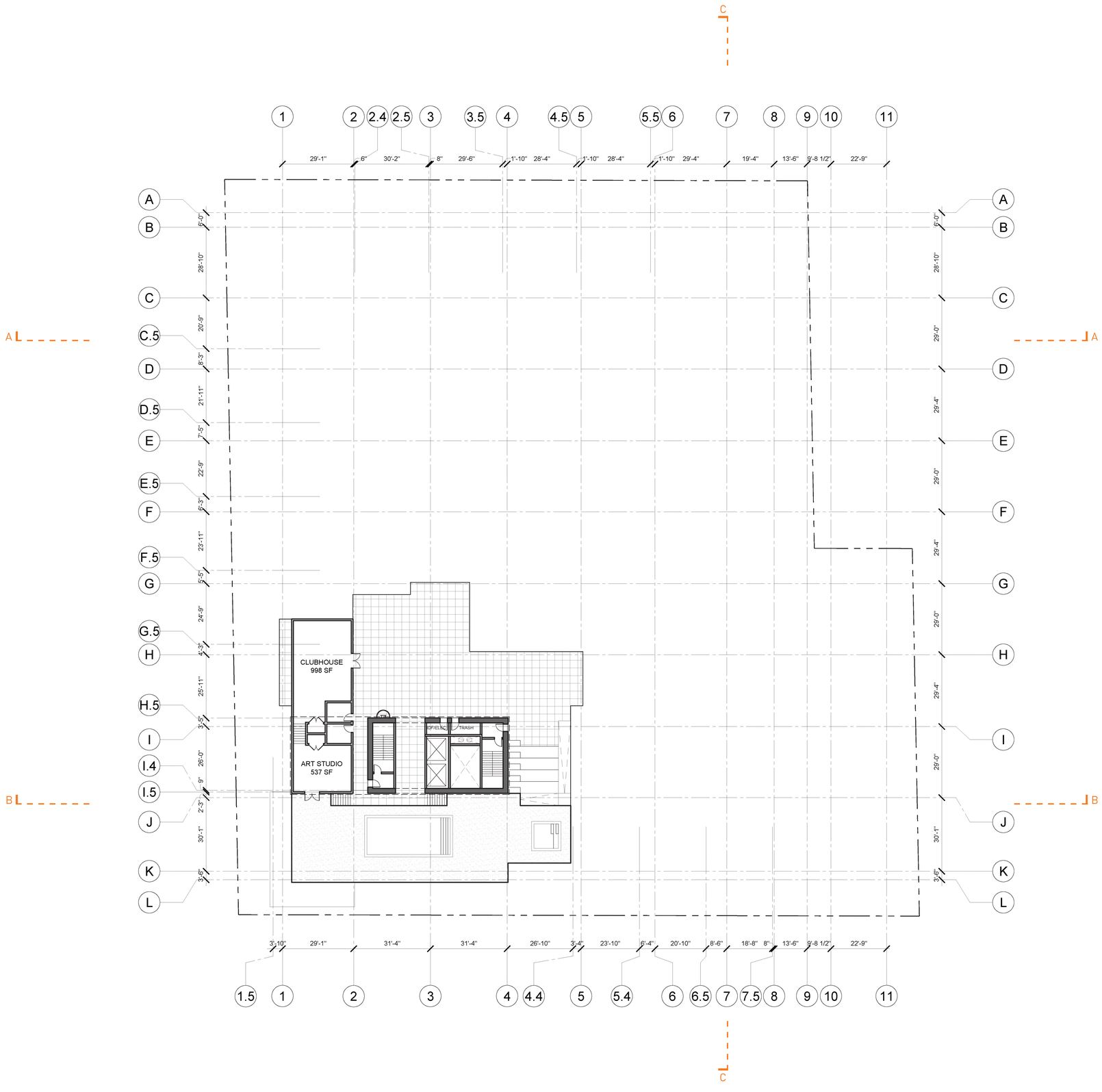

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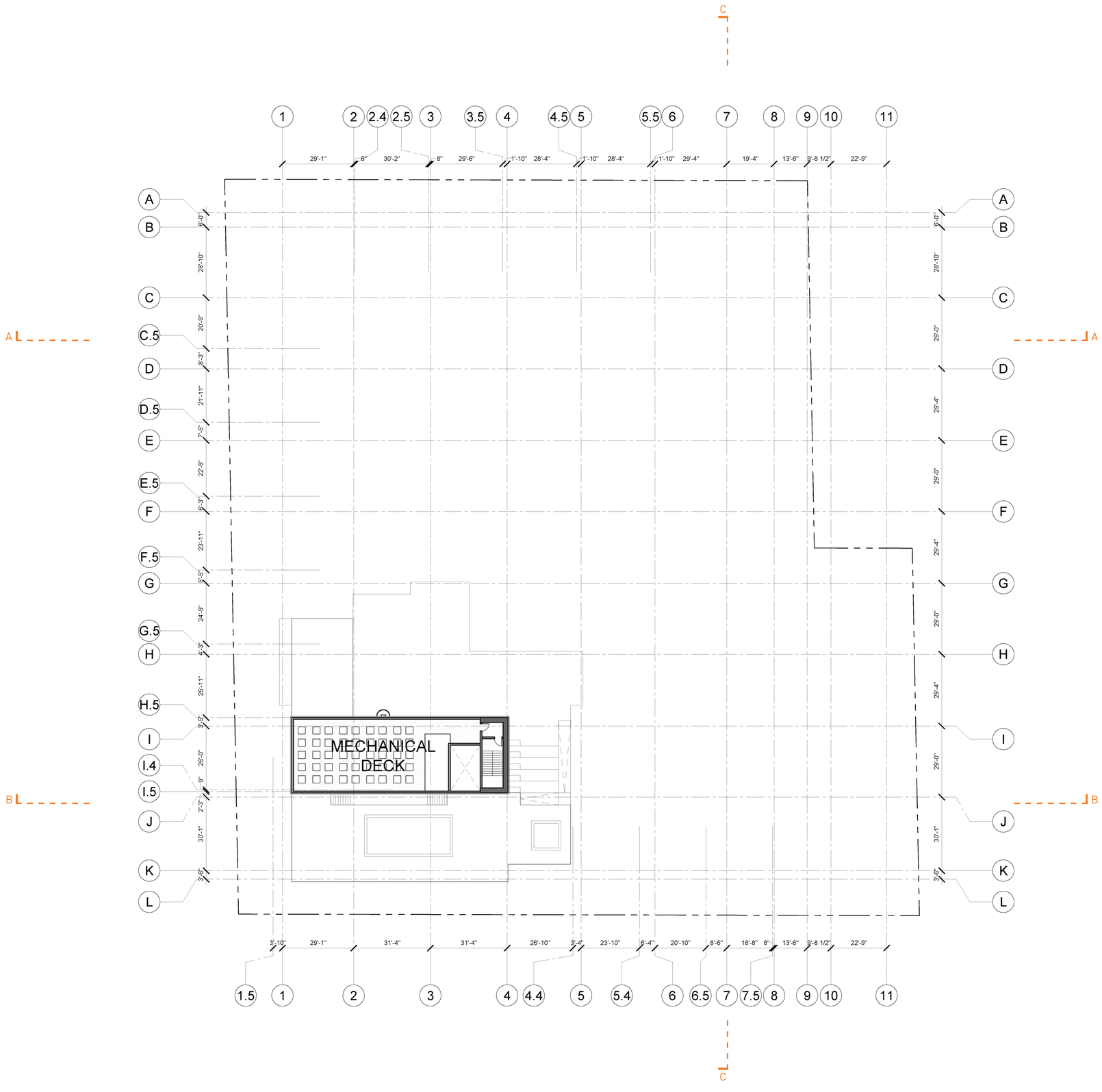
L11

FLOOR PLANS **BAY STREET**

7.31.2019



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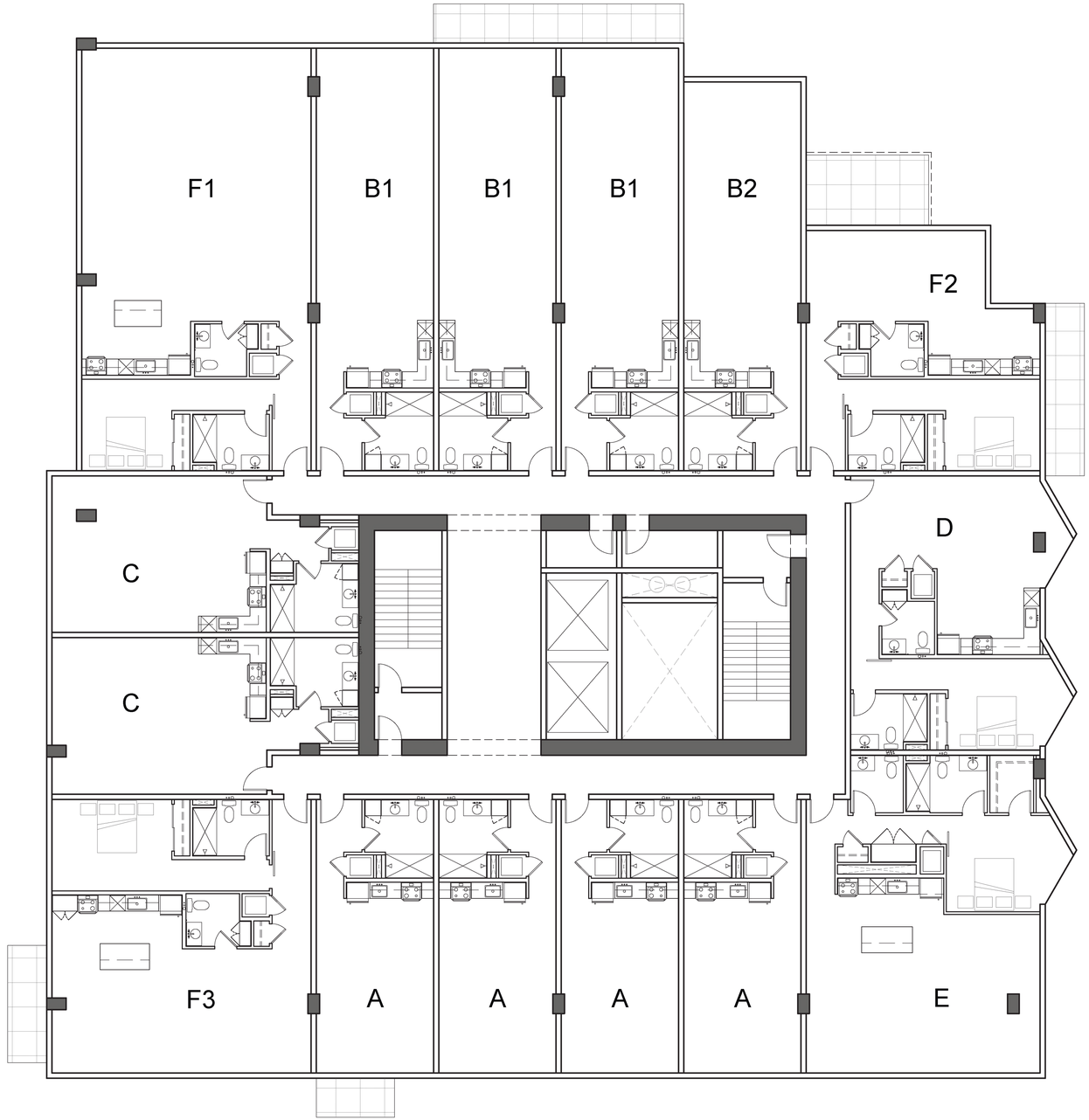

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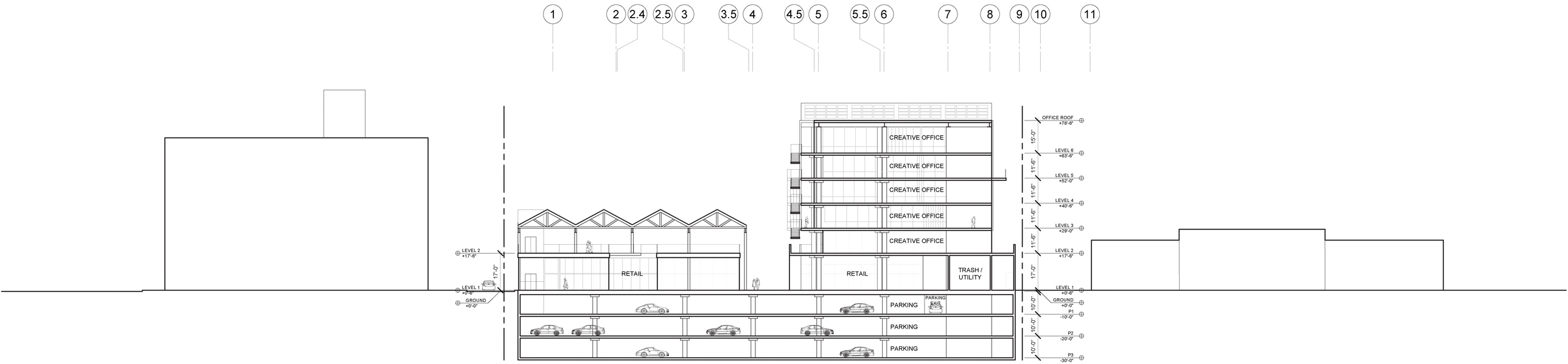

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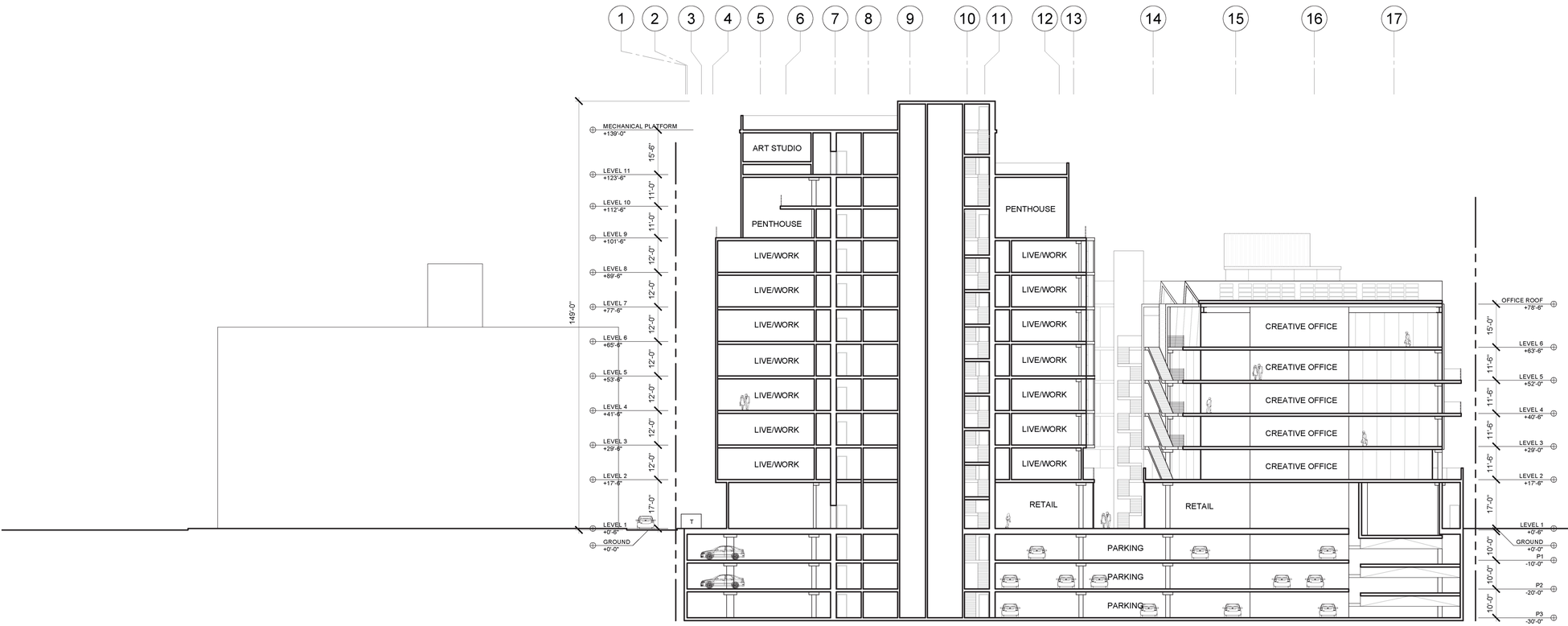
SECTION A

BAY STREET

7.31.2019



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SECTION B

BAY STREET

7.31.2019

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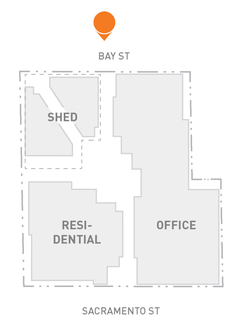
SCALE 1:20

SECTION C

BAY STREET

7.31.2019



KEY PLAN

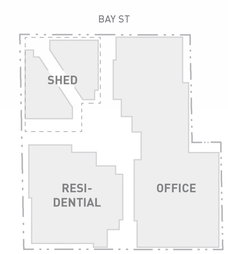
0 2 4 8 16

SCALE 3/32"=1'

BAY ST ELEVATION

ELEVATIONS **BAY STREET**

7.31.2019



KEY PLAN

0 2 4 8 16

SCALE 3/32"=1'

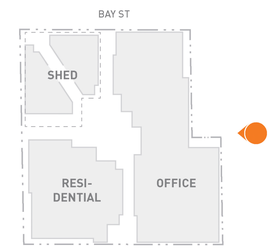
SACRAMENTO ST ELEVATION
ELEVATIONS **BAY STREET**

7.31.2019

SACRAMENTO ST

EAST ELEVATION ALONG PROPERTY LINE

BAY ST



KEY PLAN

0 2 4 8 16

SCALE 3/32"=1'

EAST ELEVATION

ELEVATIONS **BAY STREET**

7.31.2019

BAY ST

WEST ELEVATION ALONG ALLEY

SACRAMENTO ST

KEY PLAN

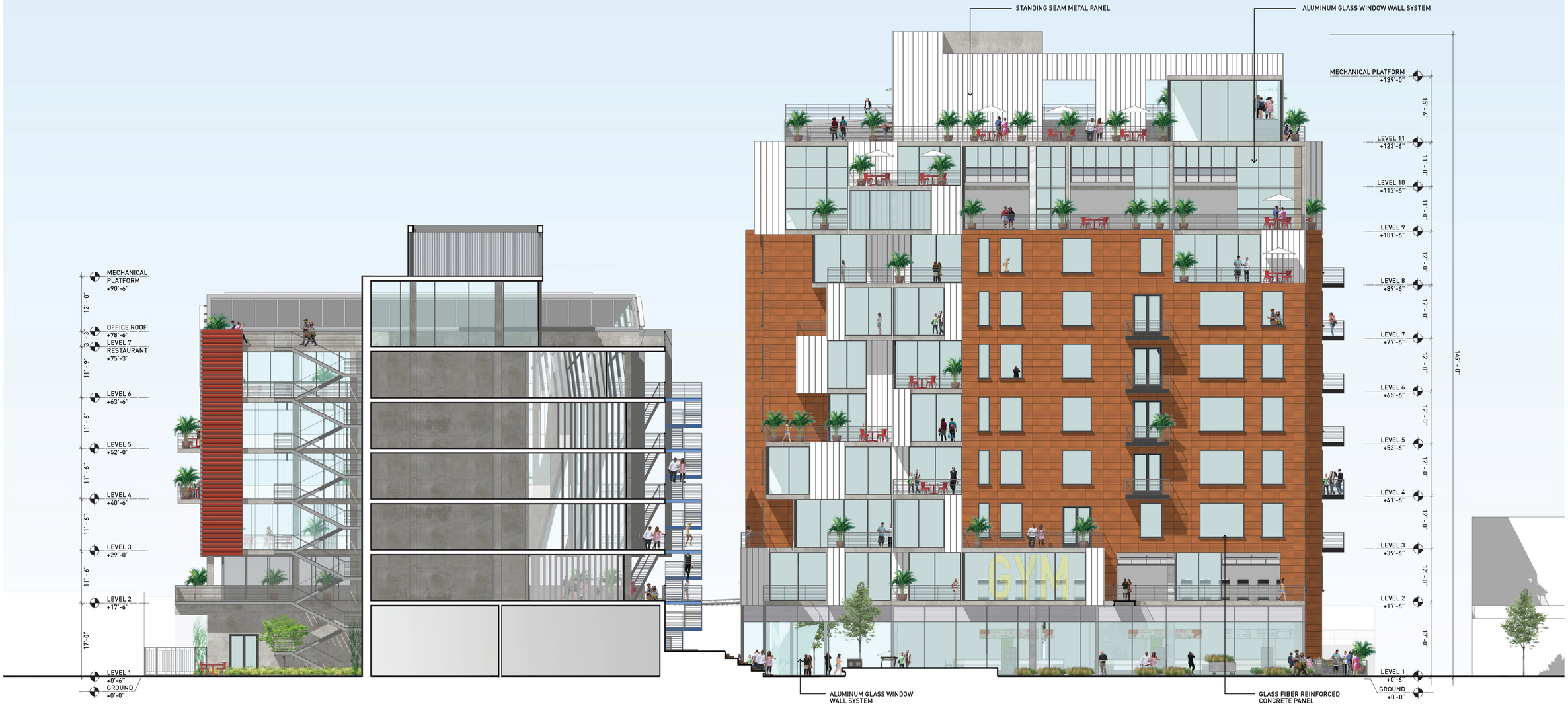
0 2 4 8 16

SCALE 3/32"=1'

WEST ELEVATION

ELEVATIONS **BAY STREET**

7.31.2019



KEY PLAN

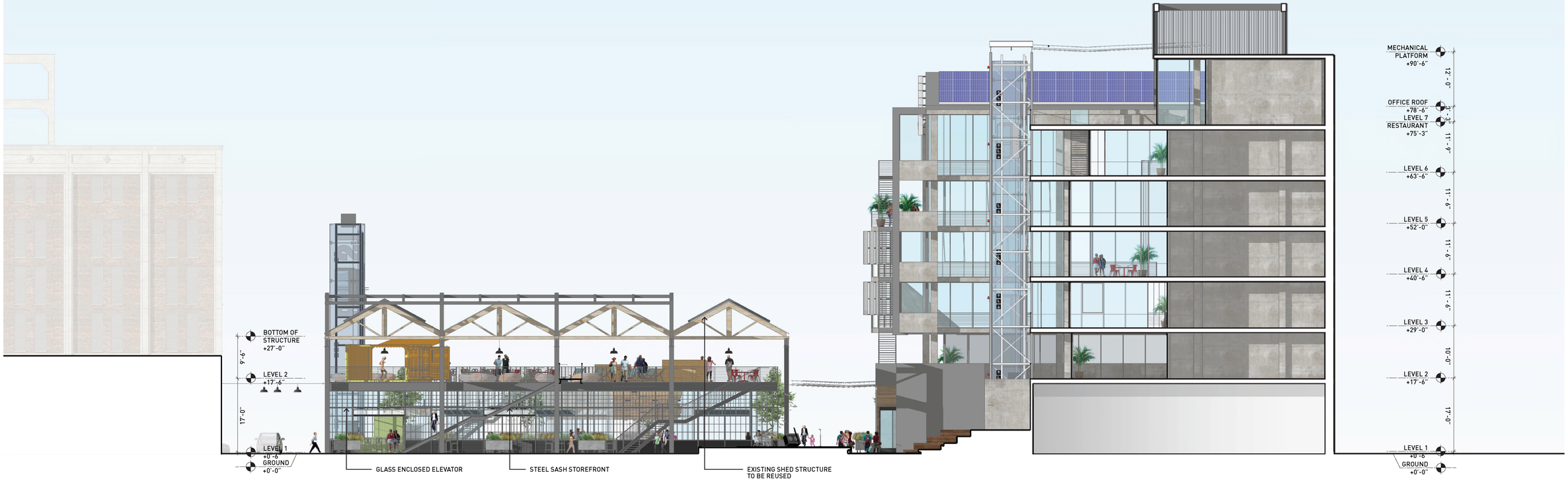
0 2 4 8 16

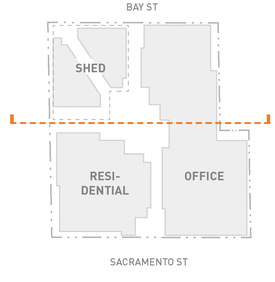
SCALE 3/32"=1'

INTERIOR NORTH ELEVATION

ELEVATIONS **BAY STREET**

7.31.2019





KEY PLAN

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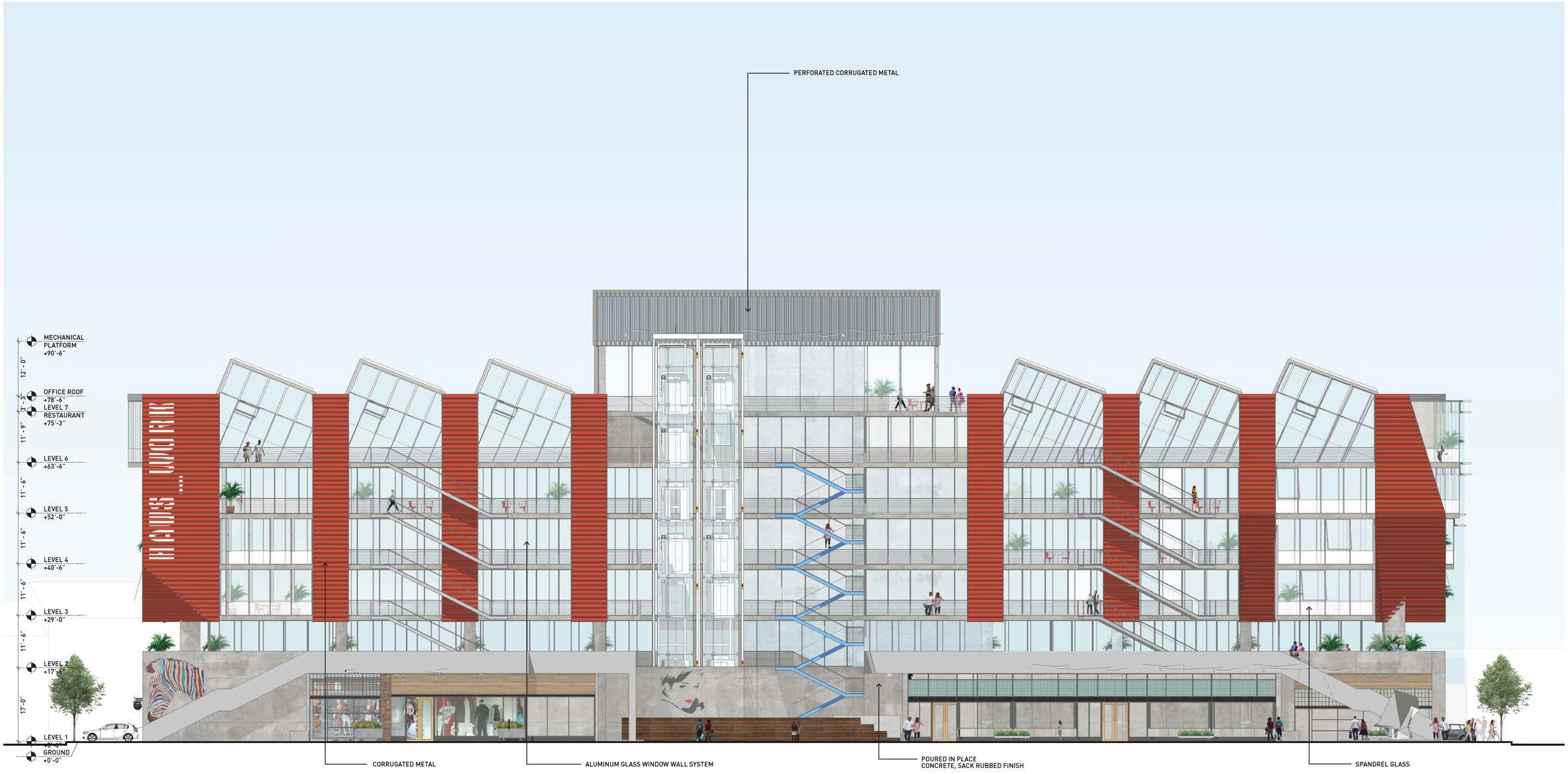
SCALE 3/32"=1'

INTERIOR SOUTH ELEVATION

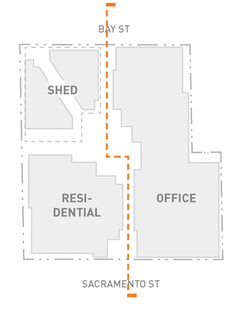
ELEVATIONS **BAY STREET**

7.31.2019



BAY ST

SACRAMENTO ST



KEY PLAN

0 2 4 8 16

SCALE 3/32"=1'

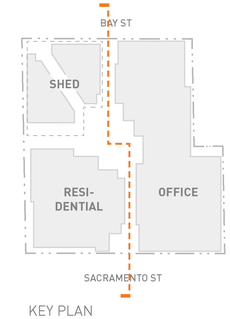
INTERIOR EAST ELEVATION

ELEVATIONS **BAY STREET**

7.31.2019

SACRAMENTO ST

BAY ST



KEY PLAN

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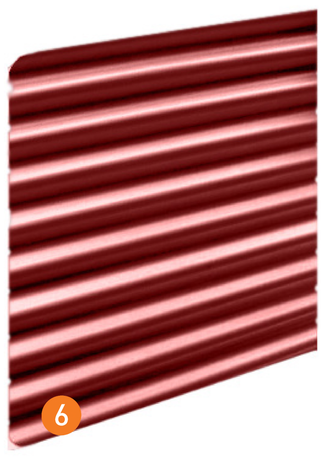
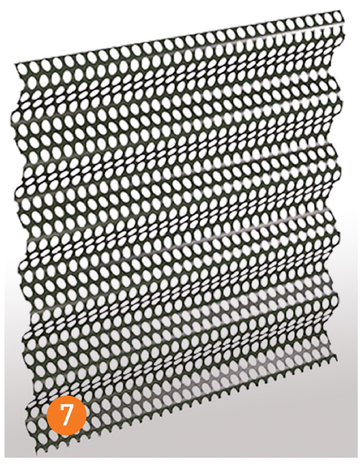
SCALE 3/32"=1'

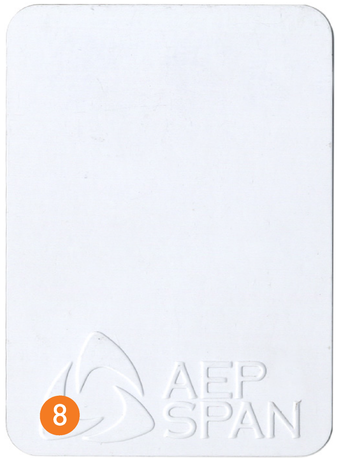
INTERIOR WEST ELEVATION

ELEVATIONS **BAY STREET**

7.31.2019





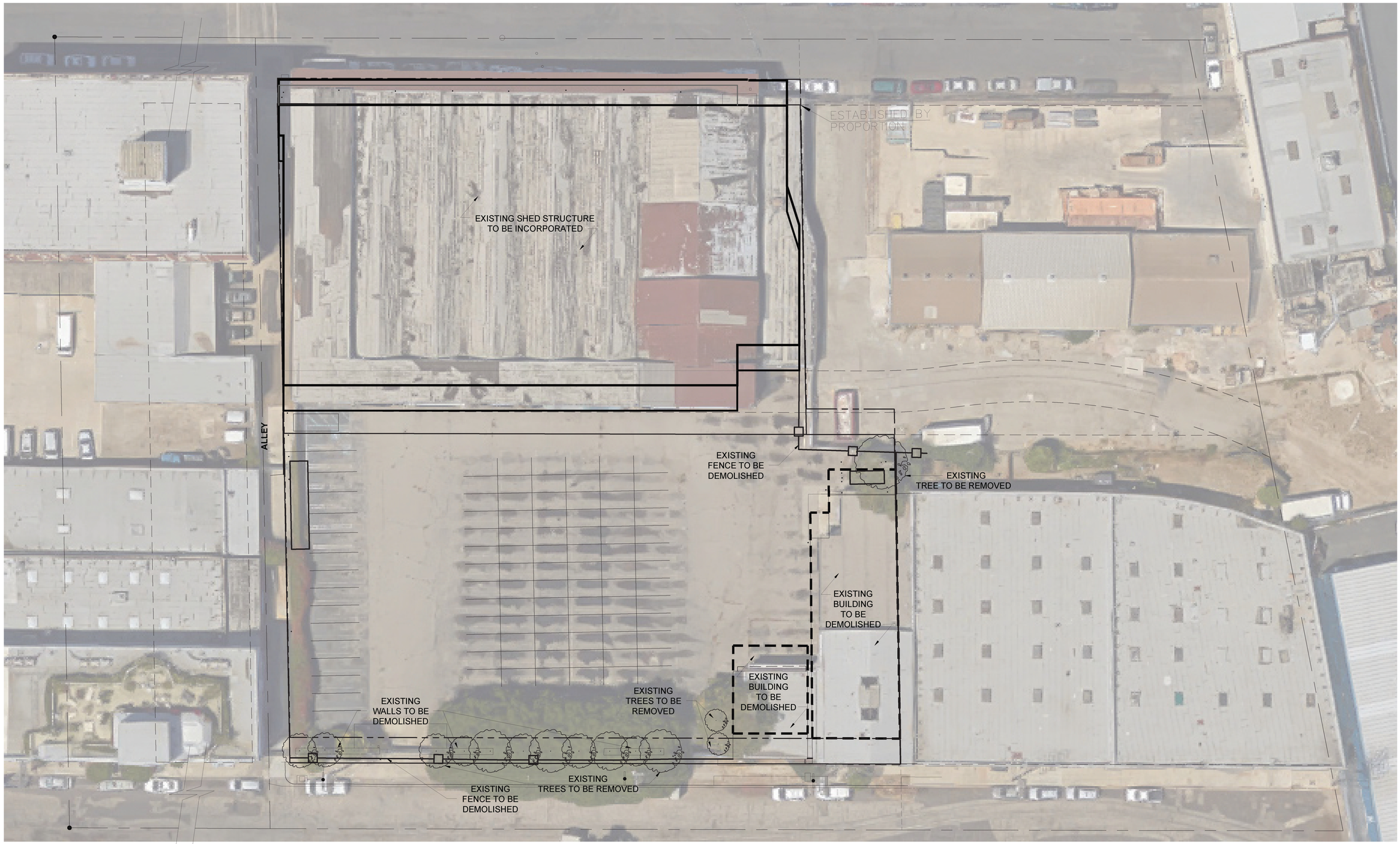


1. POURED IN PLACE CONCRETE, SACK RUBBED
2. GLASS FIBER REINFORCED CONCRETE PANEL
3. SPANDREL GLASS
4. ALUMINUM GLASS WINDOW WALL SYSTEM
5. STEEL SASH STOREFRONT
6. CORRUGATED METAL
7. PERFORATED CORRUGATED METAL
8. STANDING SEAM METAL PANEL

BAY ST
Anywhere
super fries
FIRST LANE

PEAKED
ART GALLERY
BA
Y

PEANUTS
ART GALLERY



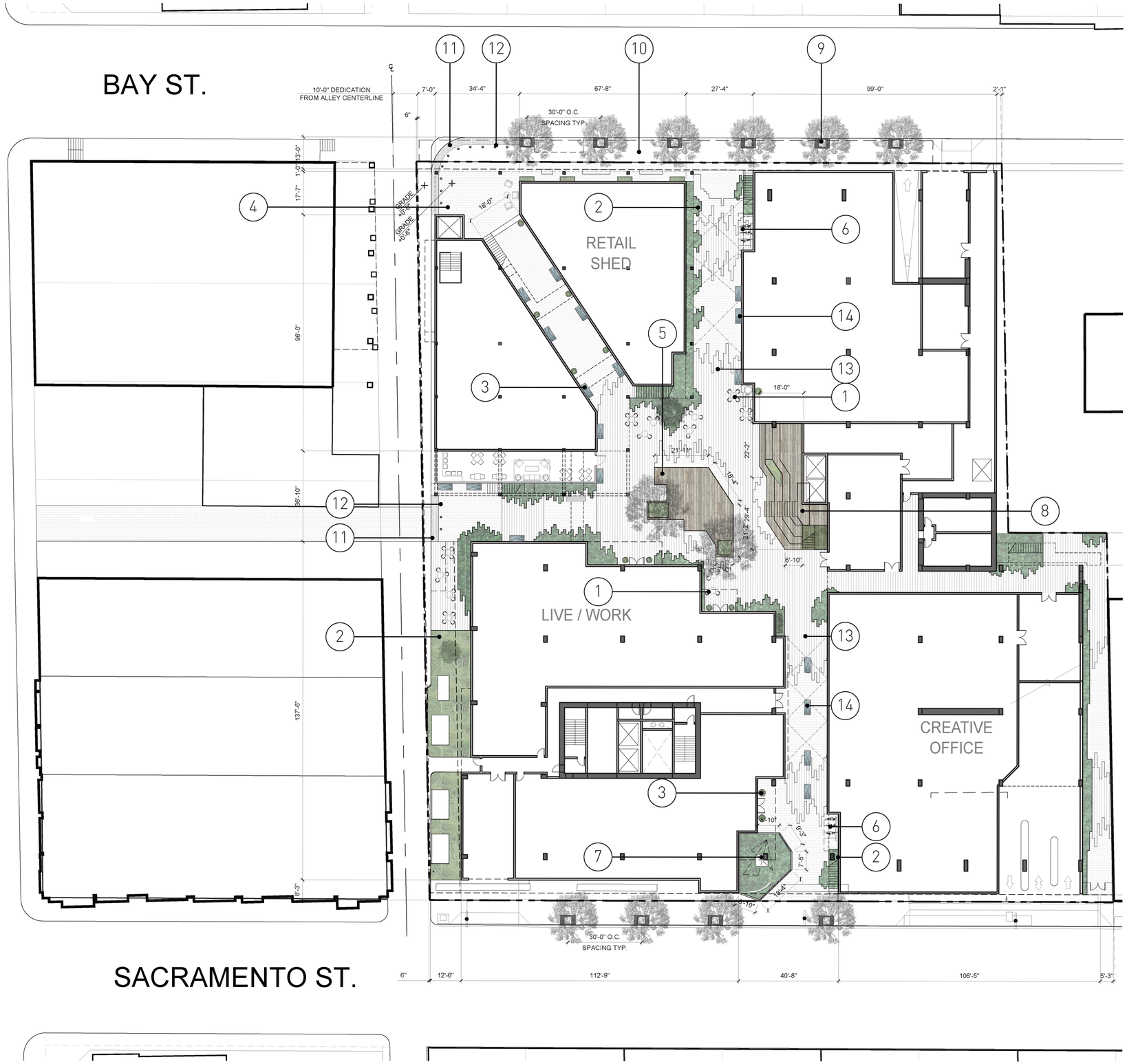
0 5 10 20 40

SCALE 1:20

LANDSCAPE DEMOLITION PLAN

BAY STREET

7.31.2019



KEYNOTES:

1. SITE FURNITURE
2. PLANTING AREA, TYP.
3. STEEL PLANTERS
4. VALET DROP OFF
5. UNDER-LIT WOOD STAGE W/ TREE WELLS
6. BIKE RACKS
7. SCULPTURE / ART DISPLAY
8. WOOD AMPHITHEATRE SEATING
9. TREE GRATES
10. CITY SIDEWALK - PER CITY STANDARDS
11. ZERO EDGE CURB W/ TRUNCATED DOMES
12. K-4 RATED BOLLARDS
13. CONCRETE WOOD PLANKS
14. MOBILE STEEL PLANTERS

PLANTING PALETTE

*SELECTED FROM THE LOS ANGELES RIVER MASTER PLAN LANDSCAPE GUIDELINES (JANUARY 2004):

TREES:

CERCIS CANADENSIS 'FOREST PANSY' / EASTERN REDBUD

PLATANUS RACEMOSA / CALIFORNIA SYCAMORE

SAMBUCAS MEXICANA / MEXICAN ELDERBERRY

SHRUBS:

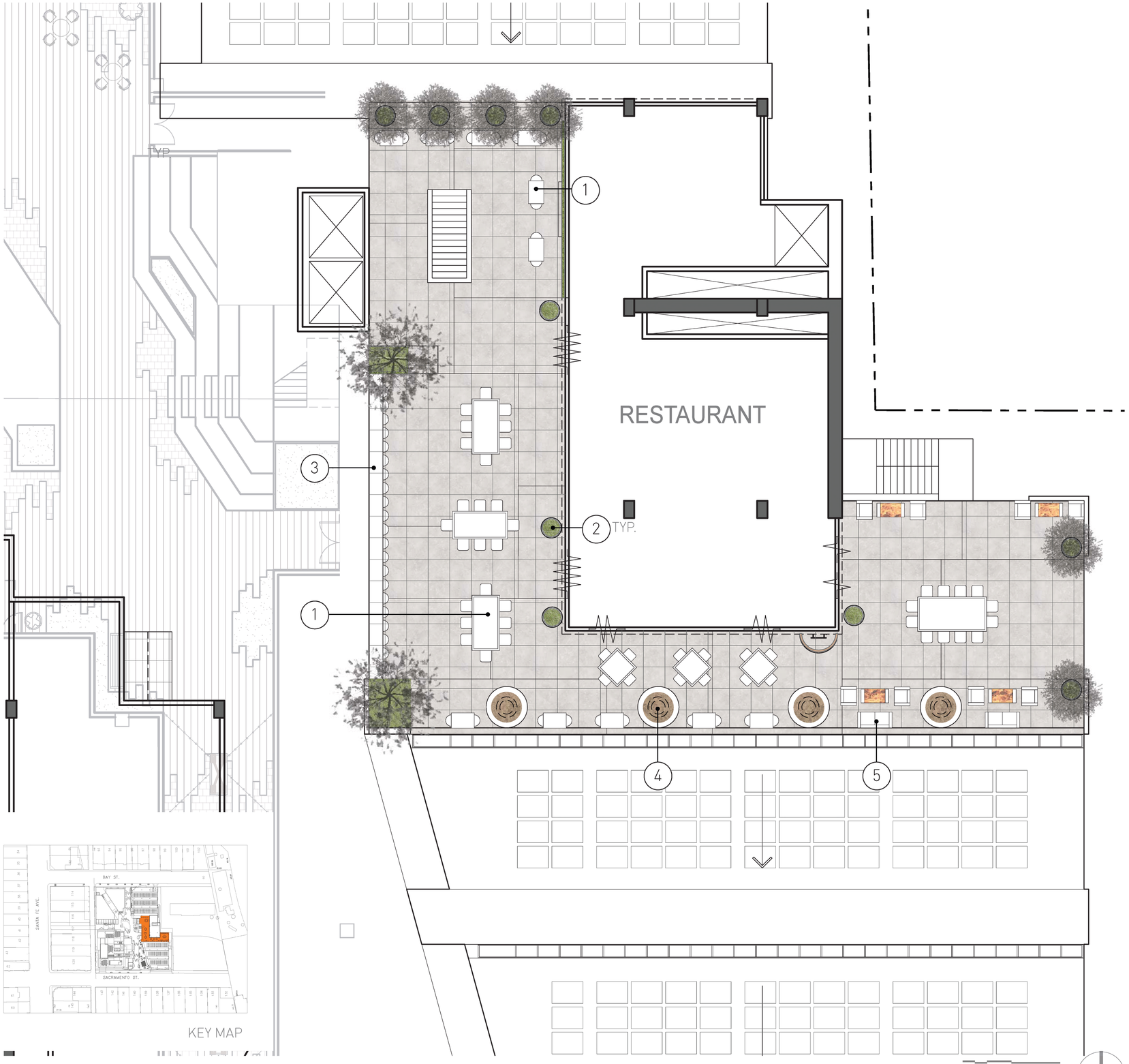
CEANOTHUS 'YANKEE POINT' / YANKEE POINT CALIFORNIA LILAC
ELYMUS GLAUCUS / BLUE WILD RYE GRASS
ENCELIA CALIFORNIA / CALIFORNIA ENCELIA
HEUCHERA 'WENDY' / WENDY CORAL BELLS
NASELLA PULCHRA / PURPLE NEEDLE GRASS

MOBILE STEEL PLANTERS

UNDER-LIT WOOD STAGE W/ TREE WELLS

LINEAR PAVING WITH IRREGULAR PLANTING EDGE

WOOD AMPHITHEATRE SEATING



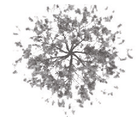
KEY MAP

KEYNOTES:

1. FLEXIBLE DINING FURNITURE
2. STEEL CYLINDRICAL PLANTER POT
3. BAR TOP OVERLOOK W/ STOOLS
4. MOVABLE OUTDOOR HEATERS
5. LOUNGE SEATING WITH FIRE FEATURE

PLANTING PALETTE

*SELECTED FROM THE LOS ANGELES RIVER MASTER PLAN LANDSCAPE GUIDELINES (JANUARY 2004):



TREES:

OLEA EUROPAEA / SPECIMEN OLIVE TREE

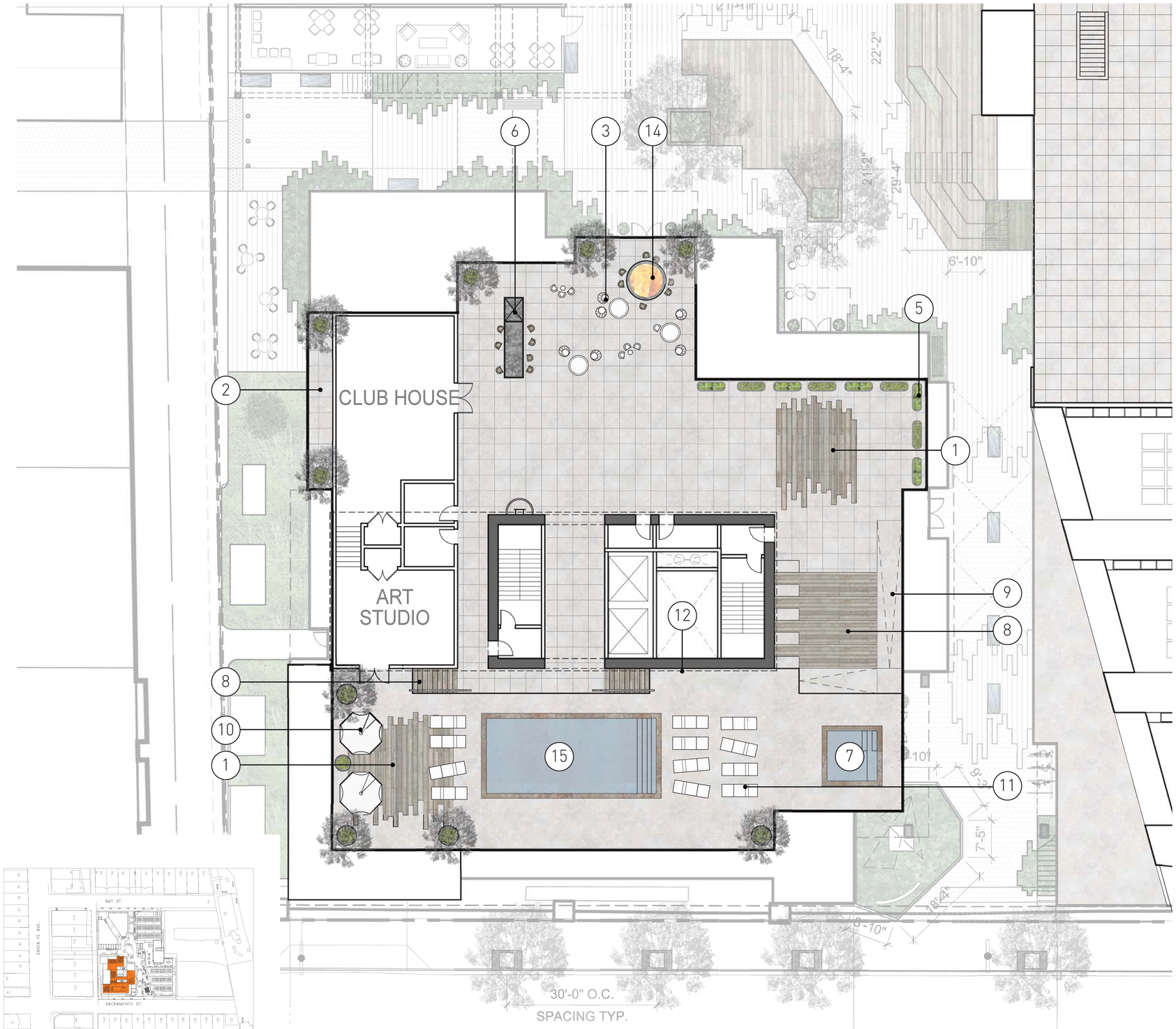
CERCIS CANADENSIS / EASTERN REDBUD

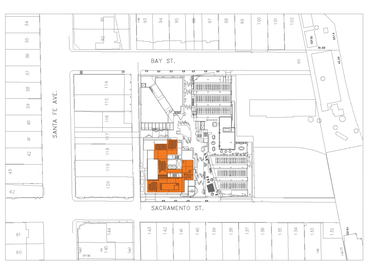
SHRUBS:

CAREX PRAEGRACILIS / SLENDER SEDGE
EPILOBIUM CANUM / CALIFORNIA FUSCHIA
ESCSCHOLIZIA CALIFORNICA / CALIFORNIA POPPY
SALVIA APIANA / WHITE SAGE
SALVIA SPATHACEA / HUMMINGBIRD SAGE
ROSMARINUS OFFICINALIS 'PROSTRATUS' / TRAILING ROSEMARY

FLEXIBLE OUTDOOR DINING FURNITURE AND OUTDOOR RESTAURANT BAR

VARIOUS PATIO GATHERING SPACES





KEY MAP

0 5 10 20 40
SCALE 1:20

KEYNOTES:

1. 'WOOD' PAVING
2. CONCRETE SLAB PAVING
3. FLEXIBLE OUTDOOR FURNITURE
4. CREATIVE FLEX SPACE
5. COMMUNITY GARDEN
6. OUTDOOR BBQ AREA
7. JACUZZI
8. WOOD TIMBER STEPS
9. SLOPED WALKWAY
10. POOL CABANA
11. MOVABLE POOL LOUNGE CHAIRS
12. PLANTED GREEN WALL
13. POOL
14. FIRE FEATURE

PLANTING PALETTE:

*SELECTED FROM THE LOS ANGELES RIVER MASTER PLAN LANDSCAPE GUIDELINES (JANUARY 2004):

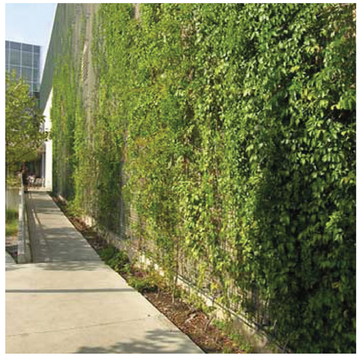
TREES:

FEIJOA SELLOWIANA / PINEAPPLE GUAVA

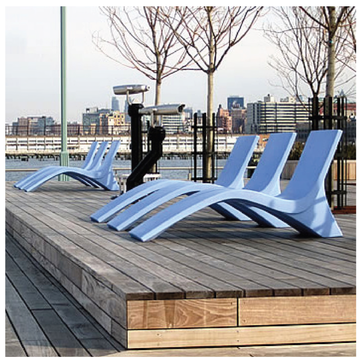
SHRUBS:

AGAVE ATTENUATA / FOXTAIL AGAVE
ALOE PLICATILIS/ FAN ALOE
ALOE VERA/ MEDICINAL ALOE
LOMANDRA LONGIFOLIA 'BREEZE' / DWARF MAT RUSH
RHUS INTEGRIFOLIA / LEMONADEBERRY
SALVIA LEUCANTHA / MEXICAN BUSH SAGE
VITIS 'ROGER'S RED'/ CALIFORNIA GRAPE VINE

FLEXIBLE OUTDOOR FURNITURE


GREEN WALL

POOL CABANA


MOVABLE LOUNGE SEATING AND WOOD PAVING

CERCIS CANADENSIS 'FOREST PANSY'
EASTERN REDBUD

PLATANUS RACEMOSA
CALIFORNIA SYCAMORE

SAMBUCAS MEXICANA
MEXICAN ELDERBERRY

UMBELLULARIA CALIFORNICA
CALIFORNIA BAY LAUREL

OLEA EUROPAEA
OLIVE

FEJOIA SELLOWIANA
PINEAPPLE GUAVA

AGAVE ATTENUATA
FOXTAIL AGAVE

ALOE VERA
MEDICINAL ALOE

ALOE PLICATILIS
NCN

CAREX ELATA 'AUREA'
SEDGE

CAREX PRAEGRACILIS
CLUSTERED FIELD SEDGE

CEANOTHUS 'YANKEE POINT'
YANKEE POINT CALIFORNIA LILAC

CLEMATIS LASIANTHA
PIPESTEM CLEMATIS

DUDLEYA BRITTONII
GIANT CHALK DUDLEYA

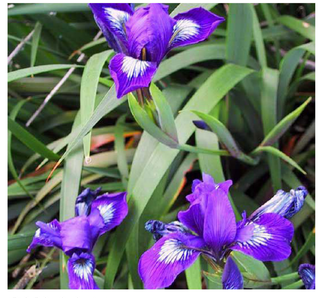
ENCELIA CALIFORNIA
CALIFORNIA ENCELIA

EPILOBIUM CANUM
CALIFORNIA FUSCHIA

ELYMUS GLAUCUS
BLUE WILD RYE GRASS

ESCHSCHOLZIA CALIFORNICA
CALIFORNIA POPPY

HEUCHERA 'WENDY'
WENDY CORAL BELLS



IRIS DOUGASIANA
DOUGLAS IRIS

LOMANDRA LONGIFOLIA 'BREEZE'
DWARF MAT RUSH

MIMULUS AURANTIACUS
BUSH MONKEYFLOWER

NASSELA PULCHRA
PURPLE NEEDLE GRASS

PENSTEMON HETEROPHYLLUS
'MARGARITA BOP'
FOOTHILL PENSTEMON

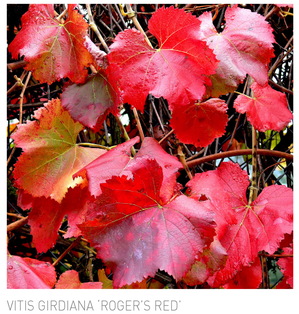
PHILODENDRON XANADU
NCN

RHAMNUS CALIFORNICA
COFFEEBERRY

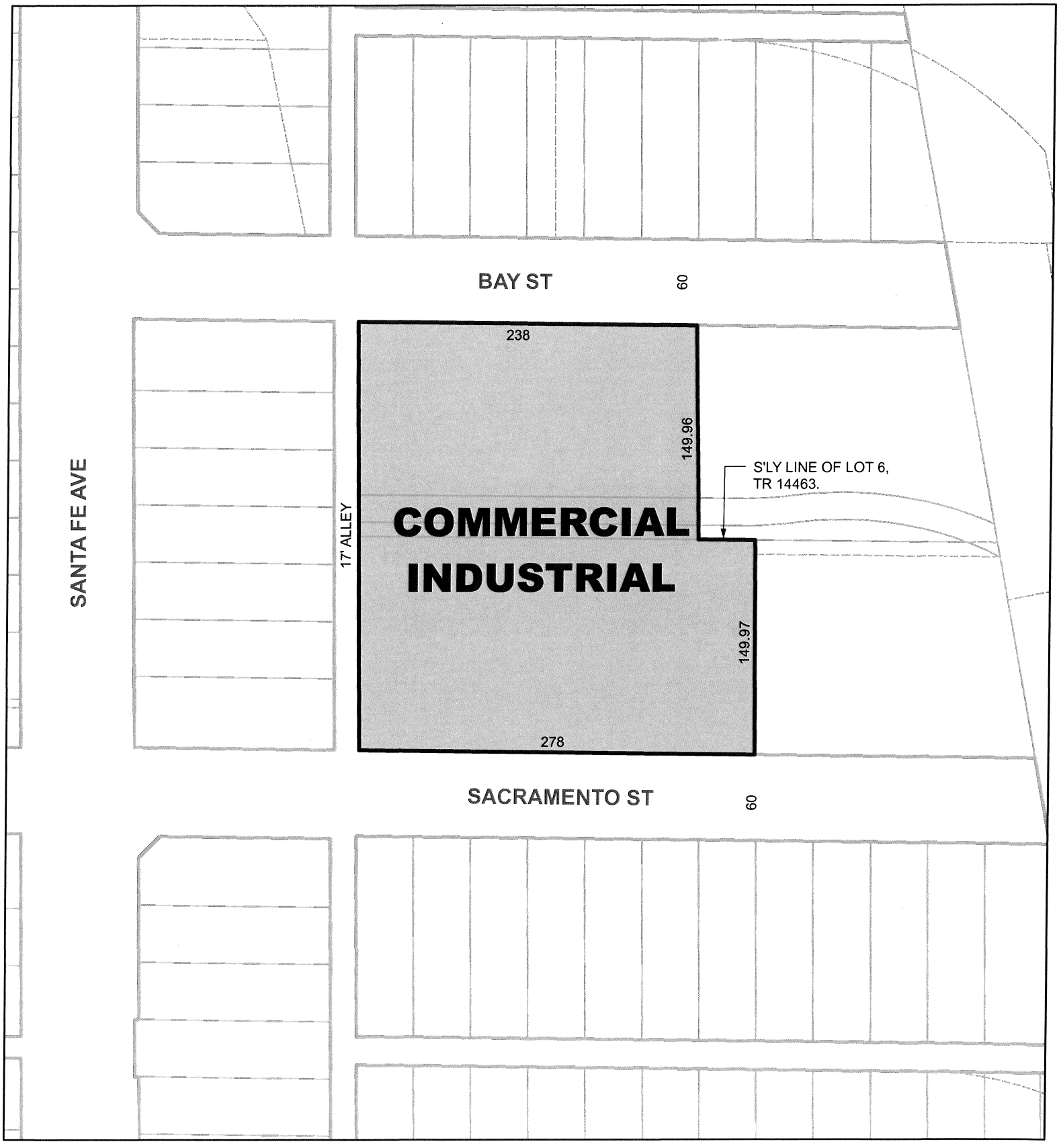
RHUS INTEGRIFOLIA
LEMONADEBERRY

SALVIA APIANA
CALIFORNIA WHITE SAGE

SALVIA SPATHACEA
HUMMINGBIRD SAGE



VITIS GIRDIANA 'ROGER'S RED'
CALIFORNIA GRAPE



0 50 100

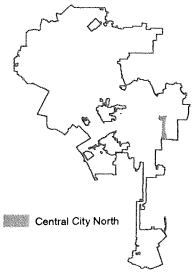
Feet

CPC-2016-3479-GPA-VZC-HD-SPR

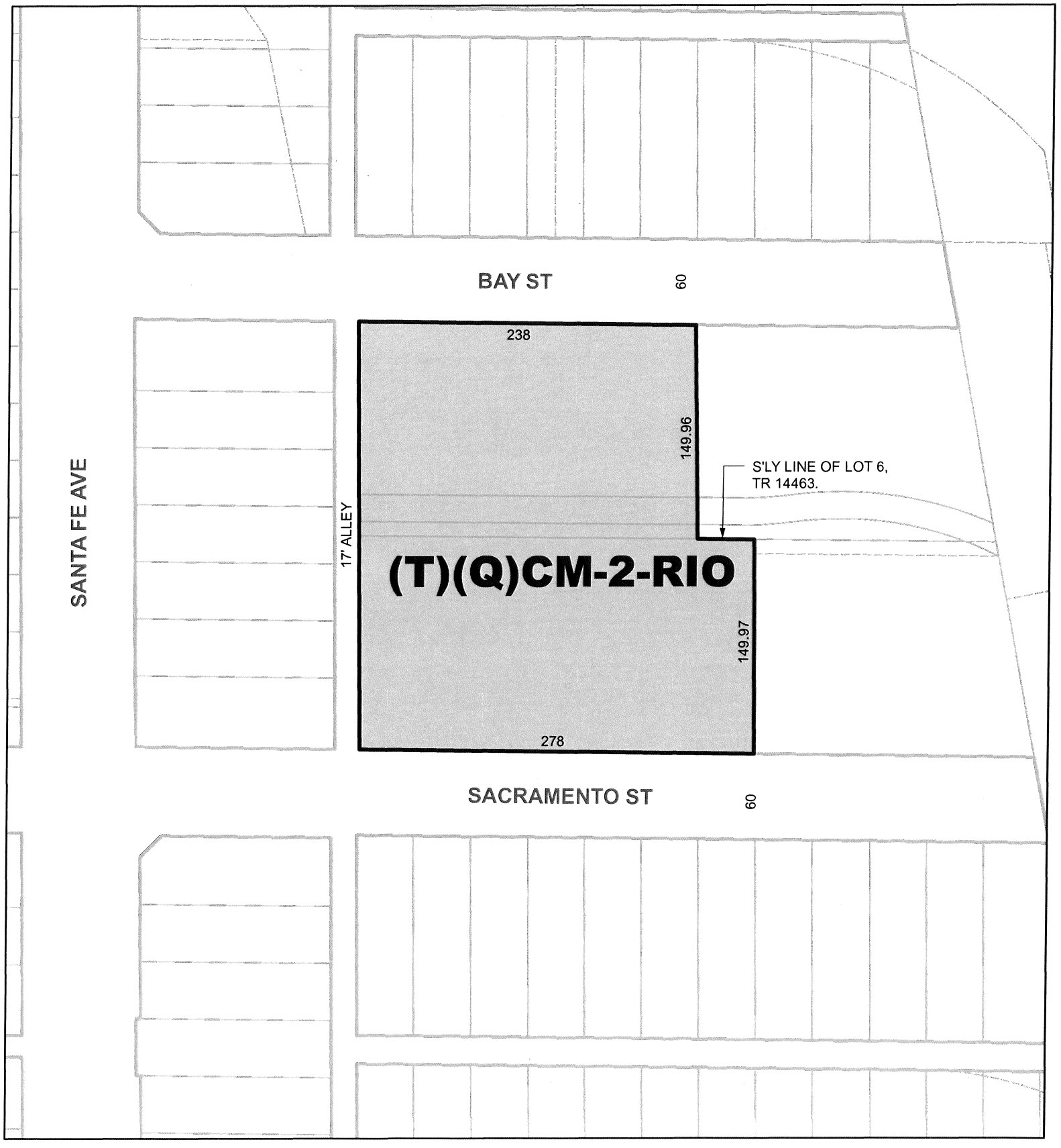
AA/CF 082719

CENTRAL CITY NORTH

City of Los Angeles



Data Sources: Department of City Planning & Bureau of Engineering



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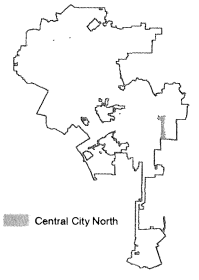
Feet

CPC-2016-3479-GPA-VZC-HD-SPR

AA/ CL 082719

City of Los Angeles



Data Sources: Department of City Planning & Bureau of Engineering

IV. Mitigation Monitoring Program

1. Introduction

This Mitigation Monitoring Program (MMP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." In addition, Section 15097(a) of the State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the State CEQA Guidelines.

The City of Los Angeles is the Lead Agency for the Project and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

An Environmental Impact Report (EIR) has been prepared to address the potential environmental impacts of the Project. The evaluation of the Project's impacts in the EIR takes into consideration the project design features (PDF) and applies mitigation measures (MM) needed to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the PDFs and MMs identified for the Project.

2. Organization

As shown on the following pages, each identified project design feature and mitigation measure for the Project is listed and categorized by environmental issue area, with accompanying identification of the following:

Enforcement Agency – the agency with the power to enforce the project design feature or mitigation measure.

Monitoring Agency – the agency to which reports involving feasibility, compliance, implementation, and development are made.

Monitoring Phase – the phase of the Project during which the project design feature or mitigation measure shall be monitored.

Monitoring Frequency – the frequency at which the project design feature or mitigation measure shall be monitored.

Action(s) Indicating Compliance – the action(s) by which the enforcement or monitoring agency indicates that compliance with the identified project design feature or required mitigation measure has been implemented.

3. Administrative Procedures and Enforcement

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each PDF and MM and shall be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that each PDF and MM has been implemented. The Applicant shall maintain records demonstrating compliance with each PDF and MM. Such records shall be made available to the City upon request.

During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the PDFs and MMs during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs and PDFs within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

4. Program Modification

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 subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the PDFs and MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with PDFs and MMs in the MMP in their reasonable discretion. If the department or agency cannot find

substantial conformance, a PDF or MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the PDFs or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or MM shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF or MM results in a substantial change to the Project or the non-environmental conditions of approval.

5. Mitigation Monitoring Program

a) Air Quality

(1) Project Design Features

No project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

b) Cultural Resources

(1) Project Design Features

No project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

CUL-MM-1 During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor, who shall be responsible for coordinating with a certified archaeologist to implement and enforce the following:

a. The services of an archaeologist, qualified for historic resource evaluation, as defined in CEQA and Office of Historic Preservation (OHP) Guidelines, shall be secured to implement the archaeological monitoring program. The qualified archaeologist shall be listed, or be eligible for listing, in the Register of Professional Archaeologist (RPA). Recommendations may be obtained by contacting the South Central Coastal Information Center (657- 278-5395) located at California State University Fullerton.

b. In the event of a discovery, or when requested by the Project archaeologist, the contractor shall divert, direct, or temporarily halt ground disturbing activities in an area in order to evaluate potentially significant archaeological resources.

i. It shall be the responsibility of the Project archaeologist to: determine the scope and significance of the find; determine the appropriate documentation; ensure preservation, conservation, and/or relocation of the find; and determine when grading/excavation activities may resume in the area of the find.

ii. Determining the significance of the find shall be guided by California Public Resources Code Division 13, Chapter 1, Section 21083.2, subdivision (g) and (h). If the find is determined to be a "unique archaeological resource", then the applicant, in conjunction with the recommendation of the Project archaeologist, shall comply with Section 21083.2, subdivisions (b) though (f).

iii. If at any time the Project Site, or a portion of the Project Site, is determined to be a "historical resource" as defined in California Code of Regulations Chapter 3, Article 1, Section 15064.5, subdivision (a), the Project archaeologist shall prepare and issue a mitigation plan in conformance with Section 15126.4, subdivision (b).

iv. If the Project archaeologist determines that continuation of the Project or Project-related activities will result in an adverse impact on a discovered historic resource, which cannot be mitigated, all further activities resulting in the impact shall immediately cease, and the Lead Agency shall be contacted for further evaluation and direction.

v. The applicant shall comply with the recommendations of the Project archaeologist with respect to the documentation, preservation, conservation, and/or relocation of the find.

vi. The Construction Monitor shall also prepare and submit documentation of the Applicant's compliance with the Mitigation Measure CUL-MM-1 during construction every 30 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to report to the Enforcement Agency any non-compliance with the mitigation measure within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the Construction Monitor, or if the non-compliance is repeated. Such noncompliance shall be appropriately addressed by the Enforcement Agency.

c. Monitoring activities may cease when:

i. Initial grading and all excavation activities have concluded; or

ii. By written consent of the Project archaeologist, agreeing that no further monitoring is necessary. In this case, a signed and dated copy of such agreement shall be submitted to the Dept. of City Planning for retention in the administrative record for Case No. ENV-2016-3480-EIR.

d. At the conclusion of monitoring activities, and only if archaeological materials were encountered, the Project archaeologist shall prepare and submit a report of the findings to the South Central Coastal Information Center (SCCIC).

e. At the conclusion of monitoring activities, the Project archaeologist shall prepare a signed statement indicating the first and last dates monitoring activities took place, and submit it to the Department of City Planning, for retention in the administrative file for this case.

Enforcement Agency: City of Los Angeles Department of City Planning

Monitoring Agency: City of Los Angeles Department of City Planning

Monitoring Phase: Pre-construction

Monitoring Frequency: Every 30 days

Action Indicating Compliance: Submittal of compliance documentation prepared by certified archaeologist

CUL-MM-2 During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor, who shall be responsible for coordinating with a certified paleontologist to implement and enforce the following:

a. If any paleontological materials are encountered during the course of Project development, the Construction Monitor, in accordance with CUL-MM-2, shall coordinate with the services of a paleontologist, and all further development activity shall halt and the following shall be undertaken:

i. 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.

ii. In the event of a discovery, or when requested by the Project paleontologist, the contractor shall divert, direct, or temporarily halt ground disturbing activities in an area in order to evaluate potentially

significant paleontologist resources. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

iii. The Construction Monitor shall also prepare and submit documentation of the Applicant's compliance with the Mitigation Measure CUL-MM-2 during construction every 30 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to report to the Enforcement Agency any non-compliance with the mitigation measure within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the Construction Monitor, or if the non-compliance is repeated. Such noncompliance shall be appropriately addressed by the Enforcement Agency.

iv. The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.

v. The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report.

b. At the conclusion of monitoring activities, the Project paleontologist shall prepare a signed statement indicating the first and last dates monitoring activities took place, and submit it to the Department of City Planning, for retention in the administrative file for this case. Copies of the paleontological survey, study or report shall also be submitted to the Los Angeles County Natural History Museum.

c. 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.

Enforcement Agency: City of Los Angeles Department of City Planning

Monitoring Agency: City of Los Angeles Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: Every 30 days

Action Indicating Compliance: Submittal of compliance documentation prepared by certified paleontologist

c) Geology and Soils

(1) Project Design Features

No project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

d) Greenhouse Gas Emissions

(1) Project Design Features

GHG-PDF-1[1] At least 20 percent of the total code-required parking spaces provided for all types of parking facilities shall be capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20-percent requirement results in a fractional space, round up to the next whole number. A label stating "EV CAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

At least 5 percent of the total code-required parking spaces shall be equipped with EV charging stations. Plans shall indicate the proposed type and location(s) of charging stations. Plan design shall be based on Level 2 or greater EVSE at its maximum operating capacity. When the application of the 5-percent requirement results in a fractional space, round up to the next whole number.

Enforcement Agency: City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning

Monitoring Agency: City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning

Monitoring Phase: Pre-construction; construction

[1] GHG-PDF-1 has been revised reflect a City policy on the provision of electric vehicles. This change is noted in Section III. Revisions, Clarifications, and Corrections to the Draft EIR, of this Final EIR.

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance: Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

GHG-PDF-2 The Project will utilize electric or solar-powered generators during construction, as feasible.

Enforcement Agency: City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning

Monitoring Agency: City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: Once during field inspection

Action Indicating Compliance: Field inspection sign-offs

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

e) Hazard and Hazardous Materials

(1) Project Design Features

No project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

f) Hydrology and Water Quality

(1) Project Design Features

No project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

g) Land Use Planning

(1) Project Design Features

No project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

h) Noise

(1) Project Design Features

No project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

NOI-MM-1 Construction activities that produce vibration (i.e. excavation work or auger drilling foundations or shoring piles) shall be sequenced so that vibration sources within ten feet of the existing building at 2145-2159 Sacramento Street do not operate simultaneously.

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodically during construction

Action Indicating Compliance: Field inspection sign-off

NOI-MM-2 Prior to the start of Project construction, the Applicant shall retain the services of a qualified structural engineer to conduct pre-construction surveys to document the conditions at the boundary of the Project Site (surveys conducted on the Project Site) adjacent to 2145-2159 Sacramento Street and document the apparent physical condition of the readily-visible features, including but not limited to the exterior building structure of the existing building at 2145-2159 Sacramento Street. The Applicant shall request access to the interior to observe interior walls and ceiling finishes. If access is denied, interior conditions would not be considered as existing physical conditions.

The Applicant shall retain the services of a qualified acoustical engineer to review the proposed construction equipment and develop and implement a vibration monitoring system capable of documenting the construction-related ground vibration levels at the existing building at 2145-2159 Sacramento Street during site demolition, excavation and pile installation, where heavy construction equipment (e.g., large bulldozer, excavator, drill rig) would be operating within

ten feet of 2145-2159 Sacramento Street. Vibration monitoring shall include the following:

a. The vibration monitoring system shall measure and store the peak particle velocity (PPV) in inch/second to determine whether the groundborne vibration levels at the boundary of the Project Site adjacent to the existing building at 2145-2159 Sacramento Street reach 0.25 PPV inches/second.

b. The vibration monitoring system shall include documentation, consisting of video and/or photographic documentation, of accessible and visible areas on the exterior of the existing building at 2145-2159 Sacramento Street.

c. The vibration monitoring system shall survey for vertical and horizontal movement, as well as vibration thresholds.

d. In the event the PPV reaches 0.20 PPV inch/second at the façade of the existing building at 2145-2159 Sacramento Street,

i. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including, but not limited to, halting/staggering concurrent activities and utilizing lower vibratory techniques. Construction activities may then restart.

e. In the event the PPV reaches 0.25 PPV inch/second at the façade of the existing building at 2145-2159 Sacramento Street,

i. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including, but not limited to, halting/staggering concurrent activities and utilizing lower vibratory techniques.

ii. The qualified professional shall visually inspect the adjacent façade of the existing building at 2145-2159 Sacramento Street for any damage. The results of the inspection must be logged. Vibration measurement shall be made with the new construction method to verify that the vibration level is below the warning level of 0.20 PPV. Construction activities may then restart.

iii. In the event damage occurs due to construction vibration, such damage shall be repaired.

f. The vibration monitoring system shall be submitted to the Department of Building and Safety and received into the case file for the associated discretionary action permitting the Project prior to initiating any construction activities.

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodically during construction

Action Indicating Compliance: Field inspection sign-off

i) Population and Housing

(1) Project Design Features

No project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

j) Public Services

(1) Project Design Features

PUB-PDF-1 Prior to the start of construction, temporary fencing will be placed along the periphery of the active construction areas to keep unpermitted persons from entering the construction area and to screen construction activities from view. The perimeter fence will have gates installed to facilitate the ingress and egress of equipment and construction workers. Where applicable, the construction fence would incorporate a pedestrian walkway with temporary lighting. Should sections of the construction fence have to be removed to facilitate work in progress, barriers and or K – rails would be installed to prevent public entry and theft.

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Once during construction

Action Indicating Compliance: Field inspection sign-off

PUB-PDF-2 The Project will provide for on-site security measures and controlled access systems for residents and tenants to minimize the demand for police protection services. These measures include, but are not limited to, the following:

The Project will provide for on-site security measures and controlled access systems for residents and tenants to minimize the demand for police protection services. These measures include, but are not limited to, the following:

- Perimeter lighting to supplement the street lighting and to provide increased visibility and security
- On-site security personnel, commensurate to similar/comparable residential and retail projects of its size, as needed
- Installation of parking garage access control
- Installation of residential units access control

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Pre-operation

Monitoring Frequency: Once prior to the issuance of Certificate of Occupancy

Action Indicating Compliance: Submittal of compliance documentation and subsequent issuance of Certificate of Occupancy

PUB-PDF-3 Prior to the issuance of a certificate of occupancy, the Newton Division commanding officer will be provided with a diagram of each portion of the property. The diagram will include access routes and any additional information that might facilitate police response.

Enforcement Agency: City of Los Angeles Police Department, City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Police Department, City of Los Angeles Department of Building and Safety

Monitoring Phase: Pre-operation

Monitoring Frequency: Once prior to the issuance of Certificate of Occupancy

Action Indicating Compliance: Submittal of compliance documentation and subsequent issuance of Certificate of Occupancy

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

k) Transportation

(1) Project Design Features

TRANS-PDF-1 **Construction Management Plan**

The Project Applicant would prepare and submit a Construction Management Plan, including street closure information, detour plans, truck routes, and staging plans, to LADOT for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan would be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and would include, but not be limited to, the following measures:

- Prohibition of construction worker, equipment or construction-related vehicle parking on adjacent streets.
- Prohibition of construction equipment or material deliveries within the public right-of-way unless specified in the Construction Management Plan.
- Provisions for temporary traffic control during all construction activities adjacent to public right-of-way to improve traffic flow on public roadways (e.g., flag person).
- Provisions of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate.
- Provisions to accommodate the equipment storage and truck staging on-site whenever possible to avoid surrounding streets.
- Scheduling of construction-related deliveries, haul trips, etc., during off-peak hours to the extent feasible.
- Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the Project Site and impact roadway traffic, and if needed, utilize an organized onsite staging area.
- Obtaining all required approvals for truck haul routes from the City prior to issuance of any permit for the Project.

Enforcement Agency: City of Los Angeles Department of Transportation

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at Project plan check prior to issuance of grading or building permit; once during field inspection

Action Indicating Compliance: Plan approval and issuance of grading permit; field inspection sign-off

TRANS-PDF-2 Pedestrian Facilities - Construction

- The Project Applicant would maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the Project 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.

- The Project Applicant would provide temporary pedestrian facilities adjacent to the project site and would provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.

- The Project Applicant would provide covered walkways where pedestrians are exposed to potential injury from falling objects.

- The Project Applicant would keep sidewalks open during construction until only when it is absolutely required to close or block sidewalk for reasonable construction staging or safety. Where such closures are necessary, the Project's Construction Management Plan will identify the location of any sidewalk and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of the closure. Sidewalk would be reopened as soon as reasonably feasible taking construction and construction staging into account.

Enforcement Agency: City of Los Angeles Department of Transportation

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at Project plan check prior to issuance of grading or building permit; once during field inspection

Action Indicating Compliance: Plan approval and issuance of grading permit; field inspection sign-off

(2) Mitigation Measures

TRANS-MM-1 Transportation Demand Management (TDM) Plan

The purpose of a TDM plan is to reduce the use of single occupant vehicles (SOV) by increasing the number of trips by walking, bicycle, carpool, vanpool and transit. A TDM plan should include design features, transportation services, education, and incentives intended to reduce the amount of SOV during commute hours. Through strategic building design and orientation, the Project can facilitate access to transit, can provide a pedestrian-friendly environment, can promote non-automobile travel and can support the goals of a trip-reduction program.

A preliminary TDM plan shall be prepared and provided for LADOT review prior to the issuance of the first building permit for the Project and a final TDM plan approved by LADOT is required prior to the issuance of the first certificate of occupancy for the Project. The TDM plan should include, but not be limited to, the following strategies:

- Provide an internal Transportation Management Coordination Program with an onsite transportation coordinator;
- Provide a bulletin board, display case, or kiosk with information on transportation options that includes, but is not limited to:
    - Current routes and schedules for public transit;
    - Telephone numbers for information on transportation that includes regional ridesharing and local transit operations;
    - Promotional material on ridesharing from commuter-oriented organizations;
    - Regional and local bicycle route and facility information; and
    - A listing of on-site services or facilities which are available for carpools, vanpools, bicyclists and transit riders.
- Design the Project to ensure a bicycle, transit, and pedestrian friendly environment;
- Administrative support for the formation of carpools/vanpools;
- Designated parking areas for employee carpools and vanpools with the identification, location, design, and application as described in the study;
- One permanent carpool/vanpool for the first 50,000 to 100,000 square-feet of gross floor area and an additional carpool/vanpool space for development over 100,000 square-feet;
- Flexible/alternative work schedules and telecommuting programs;
- A provision requiring compliance with the State Parking Cash-out Law in all leases;
- Coordinate with LADOT to determine if the Project location is eligible for a future Integrated Mobility Hub (which can include space for a bike share kiosk, and/or parking spaces on-site for car-share vehicles);
- Unbundled parking from housing costs;
- Guaranteed ride home program;

- Transit routing and schedule information;
- Provide rideshare matching services;
- Implement a transit pass discount program for Project users;
- Establish bike and walk to work promotions;
- Provide bicycle parking in conformance with Section 12.21 A.16 of the LAMC with safe and convenient access to bicycle facilities;
- Where applicable, consult with local bus service for possible improvements;
- Preferential rideshare and bike share loading/unloading or parking location;
- Participate in an Arts District Transportation Management Organization (TMO), if and when a TMO is formed;
- Make a one-time financial contribution of $50,000 to the City of Los Angeles Department of Transportation to be used in the implementation of the Mobility Hub in the general area of the Project; and
- Contribute a one-time fixed fee contribution of $50,000 to be deposited into the City's Bicycle Plan Trust Fund to implement bicycle improvements in the vicinity of the Project.

Enforcement Agency: City of Los Angeles Department of Transportation

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at Project plan check prior to issuance of grading or building permit; once during field inspection

Action Indicating Compliance: Plan approval and issuance of grading permit; field inspection sign-off

TRANS-MM-2 Project Shuttle Service

To enhance the TDM measures mentioned previously and in addition to the signal system upgrades, the Project shall provide a shuttle service between the Project site and either the Metro Gold Line Little Tokyo/Arts District Station (to be replaced in the future by the 1st Street/Central Avenue Station) or Union Station. The shuttle shall be free to users from the Project and the surrounding community. The shuttle service shall be provided via a 30 passenger bus (similar to LADOT DASH bus) privately owned and operated independent of existing bus service.

Enforcement Agency: City of Los Angeles Department of Transportation

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Operation

Monitoring Frequency: Once during field inspection

Action Indicating Compliance: Provision of shuttle service

TRANS-MM-3 Transportation Systems Management (TSM) Improvements

Install new CCTVs at the following intersections:

- 7th Street and Santa Fe Avenue
- Olympic Boulevard and Santa Fe Avenue
- Mission Road and Whittier Boulevard
- 4th Street and Soto Street
- 7th Street and Soto Street

Should the Project be approved, then a final determination on how to implement these CCTV installations would be made by LADOT prior to the issuance of the first building permit. These installations would be implemented either by the applicant through the B-Permit process of the Bureau of Engineering (BOE), or through payment of a one-time fixed fee to LADOT to fund the cost of the upgrades. If LADOT selects the payment option, then the applicant would be required to pay LADOT, and LADOT shall design and construct the upgrades. If the installations are implemented by the applicant through the B-Permit process, then these improvements must be guaranteed prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy. Temporary certificates of occupancy may be granted in the events of any delay through no fault of the applicant, provided that, in each case, the applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT.

Enforcement Agency: City of Los Angeles Department of Transportation

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check prior to issuance of building permit

Action Indicating Compliance: Plan approval and issuance of building permit

I) Tribal Cultural Resources

(1) Project Design Features

TRIBAL-PDF-1 Retain a Qualified Archaeologist

In the event of an inadvertent discovery, the Project applicant shall retain a qualified archaeologist (Project archaeologist), defined as an archaeologist who meets the Secretary of the Interior's Standards for professional archaeology, during the demolition and excavation phase to carry out the Condition of Approval of the Inadvertent Discovery of Tribal Cultural Resources.

Enforcement Agency: City of Los Angeles Department of City Planning

Monitoring Agency: City of Los Angeles Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: To be determined by consultation with archaeologist

Action Indicating Compliance: Submittal of compliance documentation prepared by certified archaeologist

TRIBAL-PDF-2 Worker Environmental Awareness Program (WEAP)

Before demolition, excavation or any other ground-disturbing activities, at the project kickoff, the selected Project archaeologist or their designee will provide a WEAP training to construction crews that provides information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should unanticipated tribal cultural resources discoveries be made during construction. In addition, workers will be shown examples of the types of resources that would require notification of the Project archaeologist.

Enforcement Agency: City of Los Angeles Department of City Planning

Monitoring Agency: City of Los Angeles Department of City Planning

Monitoring Phase: Pre-construction

Monitoring Frequency: Once, prior to construction

Action Indicating Compliance: Submittal of compliance documentation prepared by certified archaeologist

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

m) Utilities and Service Systems

(1) Project Design Features

No project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

n) Energy Conservation

(1) Project Design Features

No project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

Appendix J-2

LADOT Letter, March 22, 2018

FORM GEN. 160A (Rev. 1/82)

CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

2110 Bay St
DOT Case No. CEN 16-44566

Date: March 22, 2018

To: Luciralia Ibarra, Senior City Planner
Department of City Planning

From: Wes Pringle, Transportation Engineer
Department of Transportation

Subject: **TRANSPORTATION STUDY ASSESSMENT FOR THE PROPOSED MIXED-USE PROJECT AT 2110 BAY STREET**

The Department of Transportation (DOT) has reviewed the traffic analysis, dated February 26, 2018, prepared by Crain and Associates, for the proposed mixed-use project located 2110 Bay Street. **Based on DOT's traffic impact criteria**[1], the traffic study included the detailed analysis of twenty-one intersections. This report summarizes the results of the transportation analysis (see **Attachment 1**), which accounted for other known development projects in evaluating **potential cumulative impacts and adequately evaluated the project's traffic impacts on the** surrounding community. The traffic study determined that nine of the study intersections would be significantly impacted by project related traffic. Transportation mitigation measures to fully or partially mitigate these impacts are described in this report.

DISCUSSION AND FINDINGS

A. Project Description

The proposed project consists of constructing 99 apartment units, 11 affordable housing units, 113,350 square-feet of office use, and 43,657 square-feet of shopping center. The site is currently occupied by a surface parking lot and some vacant buildings. The project would provide 479 parking spaces in a subterranean parking structure. Vehicular access to the residential and commercial uses will be provided by a two-way driveway on Sacramento Street and an egress only driveway on Bay Street. The project is expected to be completed by 2022.

B. Trip Generation

The proposed project is expected to generate approximately 2,394 net new daily trips, 243 net new trips in the a.m. peak hour and 281 net new trips in the p.m. peak hour. These estimates were derived using trip generation rates from the Institute of **Transportation Engineers (ITE) "Trip Generation Handbook, 9th Edition." These trip** generation rates are typically derived from surveys of similar land use developments but in areas with lit**tle to no transit service. Therefore, DOT's traffic study guidelines** allow projects to reduce their total trip generation to account for potential transit usage

[1] Per the DOT Traffic Study Policies and Procedures, a significant impact is identified as an increase in the Critical Movement **Analysis (CMA) value, due to project related traffic, of 0.010 or more when the final ("with project") Level of Service (LOS)** is LOS E or F; an increase of 0.020 or more when the final LOS is LOS D; or an increase of 0.040 or more when the final LOS is LOS C.

to and from the site, and for the internal-trip making opportunities that are afforded by mixed-use projects. Consistent with DOT's guidelines, the estimated trip generation includes minimal trip credits to account for the existing uses, the mixed-use nature of the project, and for the expected transit mode share. A copy of the trip generation estimates table from the traffic study is attached and identified as **Attachment 2**.

C. Traffic Impacts

In order to evaluate the effects of the project traffic on the available transportation infrastructure, the significance of the project's traffic impacts is measured in terms of change to the volume-to-capacity (V/C) ratio between the "future no project" and the "future with project" scenarios. This change in the V/C ratio is compared to DOT's established threshold standards to assess the project-related traffic impacts. DOT has determined that the project would result in significant traffic impacts at the following intersections:

1. 7th Street and Alameda Street (p.m. peak hour)
2. 7th Street and Mateo Street (p.m. peak hour)
3. 7th Street and Santa Fe Avenue (a.m. and p.m. peak hour)
4. Santa Fe Avenue and Porter Street (p.m. peak hour)
5. Olympic Boulevard and Santa Fe Avenue (a.m. peak hour)
6. 4th Street and Soto Street (a.m. and p.m. peak hour)
7. Soto Street and Whittier Boulevard (a.m. and p.m. peak hour)
8. 7th Street and Soto Street (p.m. peak hour)
9. 6th Street and Mateo Street (p.m. peak hour)

The transportation mitigation program (described below) partially or fully reduces these impacts (see **Attachment 3**). However, the impact at one intersection would be considered significant and unmitigated after the implementation of the proposed mitigation program. The intersection expected to experience an unmitigated impact is:

1. Soto Street and Whittier Boulevard

D. Freeway Analysis

The traffic study included a freeway impact analysis that was prepared in accordance with the State-mandated Congestion Management Program (CMP) administered by the Los Angeles County Metropolitan Transportation Authority (MTA). According to this analysis, the project would not result in significant traffic impacts on any of the evaluated freeway mainline segments. To comply with the Freeway Analysis Agreement executed between Caltrans and DOT in October 2013, the study also included a screening analysis to determine if additional evaluation of freeway mainline and ramp segments was necessary beyond the CMP requirements. Exceeding one of the four screening criteria would require the applicant to work directly with Caltrans to prepare more detailed freeway analyses. However, the project did not meet or exceed any of the four thresholds defined in the agreement; therefore, no additional freeway analysis was required.

PROJECT REQUIREMENTS

A. Construction Impacts

DOT recommends that a construction work site traffic control plan be submitted to DOT for review and approval prior to the start of any construction work. The plan should 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. DOT also recommends that all construction related traffic be restricted to off-peak hours.

B. Traffic Mitigation Program

Consistent with City policies on sustainability and smart growth and with DOT's trip reduction and multi-modal transportati**on goals, the project's mitigation program first** focuses on developing a trip reduction program and on solutions that promote other modes of travel. The traffic mitigation program includes the following improvements:

1. **Transportation Demand Management (TDM) Program**

The purpose of a TDM plan is to reduce the use of single occupant vehicles (SOV) by increasing the number of trips by walking, bicycle, carpool, vanpool and transit. A TDM plan should include design features, transportation services, education, and incentives intended to reduce the amount of SOV during commute hours. Through strategic building design and orientation, this project can facilitate access to transit, can provide a pedestrian-friendly environment, can promote non-automobile travel and can support the goals of a trip-reduction program.

A preliminary TDM program shall be prepared and provided for DOT review prior to the issuance of the first building permit for this project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the project. The TDM program should include, but not be limited to, the following strategies:

- Provide an internal Transportation Management Coordination Program with an on-site transportation coordinator;
- Provide a bulletin board, display case, or kiosk with information on transportation options that includes, but is not limited to:
    - Current routes and schedules for public transit;
    - Telephone numbers for information on transportation that includes regional ridesharing and local transit operations;
    - Promotional material on ridesharing from commuter-oriented organizations;
    - Regional and local bicycle route and facility information; and
    - A listing of on-site services or facilities which are available for carpools, vanpools, bicyclists and transit riders.
- Design the project to ensure a bicycle, transit, and pedestrian friendly environment;

- Administrative support for the formation of carpools/vanpools;
- Designated parking areas for employee carpools and vanpools with the identification, location, design, and application as described in the study;
- One permanent carpool/vanpool for the first 50,000 to 100,000 square-feet of gross floor area and an additional carpool/vanpool space for development over 100,000 square-feet;
- Flexible/alternative work schedules and telecommuting programs;
- A provision requiring compliance with the State Parking Cash-out Law in all leases;
- Coordinate with DOT to determine if the project location is eligible for a future Integrated Mobility Hub (which can include space for a bike share kiosk, and/or parking spaces on-site for car-share vehicles);
- Unbundled parking from housing costs;
- Guaranteed ride home program;
- 47Transit routing and schedule information;
- Provide rideshare matching services;
- Implement a transit pass discount program for Project users;
- Establish bike and walk to work promotions;
- Provide bicycle parking in conformance with Section 12.21 A.16 of the LAMC with safe and convenient access to bicycle facilities;
- Where applicable, consult with local bus service for possible improvements;
- Preferential rideshare and bike share loading/unloading or parking location;
- Participate in an Arts District Transportation Management Organization (TMO), if and when a TMO is formed.
- Make a one-time financial contribution of **$50,000** to the City of Los Angeles Department of Transportation to be used in the implementation of the Mobility Hub in the general area of the Project;
- Contribute a one-time fixed fee contribution of **$50,000** to be deposited into **the City's Bicycle Plan Trust Fund** to implement bicycle improvements in the vicinity of the project.

2. Project Shuttle Service

To enhance the TDM measures mentioned previously and in addition to the signal system upgrades, the project will provide a shuttle service between the Project site and either the Metro Gold Line Little Tokyo/Arts District Station (to be replaced in the future by the 1st Street/Central Avenue Station or Union Station. The shuttle will be free to users from the Project and the surrounding community. The shuttle service will be provided via a 30 passenger bus (similar to LADOT DASH bus) privately owned and operated independent of existing bus service.

3. Transportation Systems Management (TSM) Improvements

Some of the signalized intersections within the project study area require an upgrade to the traffic signal equipment and hardware. Many of the traffic signals at these intersections currently operate using newer controllers (Type 2070), which provide for enhanced and real-time operation of the traffic signal timing. When supplemented by additional roadway system loops and closed circuit television

(CCTV) cameras, DOT can identify the causes of delay and implement instant signal timing remedies to improve the flow of vehicles and buses. Collectively, these traffic signal upgrades provide a system-wide benefit by reducing delays experienced by motorists at the study intersections. To enhance the traffic signal system in the area and improve the network capacity for real-time video monitoring of intersection, corridor, transit, and pedestrian operations by reducing delays experienced by motorists at study intersections, the following TSM improvements were identified:

Install new CCTVs at the following intersections:

- 7th Street and Santa Fe Avenue
- Olympic Boulevard and Santa Fe Avenue
- Mission Road and Whittier Boulevard
- 4th Street and Soto Street
- 7th Street and Soto Street

Should the project be approved, then a final determination on how to implement these CCTV installations will be made by DOT prior to the issuance of the first building permit. These installations will be implemented **either** by the applicant through the B-Permit process of the Bureau of Engineering (BOE), **or** through payment of a one-time fixed fee to DOT to fund the cost of the upgrades. If DOT selects the payment option, then the applicant would be required to pay DOT, and DOT shall design and construct the upgrades.

If the installations are implemented by the applicant through the B-Permit process, then these improvements must be guaranteed prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy. Temporary certificates of occupancy may be granted in the events of any delay through no fault of the applicant, provided that, in each case, the applicant has demonstrated reasonable efforts and due diligence to the satisfaction of DOT.

C. Implementation of Improvements and Mitigation Measures

For all of the proposed intersection improvements, the final determination on the feasibility of street widening shall be made by BOE. The applicant should be responsible for the cost and implementation of any necessary traffic signal equipment modifications, bus stop relocations and lost parking meter revenues associated with the proposed transportation improvements described above. All proposed street improvements and associated traffic signal work within the City of Los Angeles must be **guaranteed through BOE's B**-Permit process, prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy. Prior to setting the bond amount, BOE shall require that the developer's engineer or contractor contact DOT's B-Permit Coordinator, at (213) 972-8687, to arrange a pre-design meeting to finalize the proposed design. Costs related to any relocation of bus zones and shelters, and to modifying or upgrading traffic signal equipment and that are necessary to implement the proposed mitigations shall be incurred by the applicant.

If a proposed traffic mitigation measure does not receive the required approval during plan review, a substitute mitigation measure may be provided subject to the approval of LADOT or other governing agency with jurisdiction over the mitigation location, upon demonstration that the substitute measure is environmentally equivalent or superior to **the original measure in mitigating the project's significant traffic impact.** To the extent that a mitigation measure proves to be infeasible and no substitute mitigation is available, then a significant traffic impact would remain.

D. Highway Dedication and Street Widening Requirements

On January 20, 2016, the City Council adopted the Mobility Plan 2035 which is the new Mobility Element of the General Plan. A key feature of the updated plan is to revise street standards in an effort to provide a more enhanced balance between traffic flow and other important street functions including transit routes and stops, pedestrian environments, bicycle routes, building design and site access, etc. Per the new Mobility Element **Bay Street and Sacramento Street** have been designated as Collector Streets that would require a 20-foot half-width roadway within a 33-foot half-width right-of-way. The applicant should check with B**OE's Land Development Group to determine** the specific highway dedication, street widening and/or sidewalk requirements for this project.

E. Parking Analysis

As referenced in the Project Description section above, the traffic study indicated that 479 parking spaces would be provided. The applicant should check with the Department of Building and Safety on the number of Code-required parking spaces needed for this project.

F. Site Access and Circulation Plan

The conceptual site plan is acceptable to DOT; however, the review of this study does not constitute approval of the driveway dimensions, access and circulation scheme. **Those require separate review and approval and should be coordinated with DOT's** Citywide Planning Coordination Section (201 N. Figueroa Street, 4th Floor, Station 3, @ 213-482-7024). In order to minimize and prevent last minute building design changes, the applicant should contact DOT early in the design process for driveway width and internal circulation requirements so that such traffic flow considerations are designed and incorporated early into the building and parking layout plans. All driveways should be Case 2 driveways and 30 feet and 16 feet wide for two-way and one-way operations, respectively. All delivery truck loading and unloading should take place on site with no vehicles having to back into the project via any of the project driveways. A copy of the site plan from the traffic study is included as **Attachment 4**.

G. Development Review Fees

An ordinance adding Section 19.15 to the Los Angeles Municipal Code relative to application fees paid to DOT for permit issuance activities was adopted by the Los Angeles City Council in 2009. This ordinance identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any

applicable fees per this ordinance.

If you have any questions, please contact Weston Pringle of my staff at (213) 972-8482.

Attachments

N:\letters\CEN16-44566_2110 Bay St Mixed-Use ts ltr

c: Shawn Kuk, Council District 14
Mehrdad Moshksar, Central District Office, DOT
Taimour Tanavoli, Citywide Planning Coordination Section, DOT
Carl Mills, Central District, BOE
Ryan Kelly, Crain and Associates

Table 8
Critical Movement Analysis (CMA) & Level of Service (LOS) Summary
Existing (2017) and Future (2022) Traffic Conditions

No.	Intersection	Peak Hour	Existing (2017) Conditions					Future (2022) Conditions					
			Existing		Plus Project			Without Project		With Project			
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	CMA	LOS	Impact	Sig.?
1	San Pedro Street &	AM	0.531	A	0.533	A	0.002	0.737	C	0.740	C	0.003	No
	7th Street	PM	0.607	B	0.613	B	0.006	0.927	E	0.933	E	0.006	No
2	Central Avenue &	AM	0.573	A	0.575	A	0.002	0.700	C	0.709	C	0.009	No
	7th Street	PM	0.627	B	0.633	B	0.006	0.861	D	0.865	D	0.004	No
3	Central Avenue &	AM	0.560	A	0.561	A	0.001	0.674	B	0.675	B	0.001	No
	Olympic Boulevard	PM	0.833	D	0.834	D	0.001	0.979	E	0.979	E	0.000	No
4	Alameda Street &	AM	0.551	A	0.553	A	0.002	0.791	C	0.793	C	0.002	No
	7th Street	PM	0.586	A	0.591	A	0.005	1.002	F	1.012	F	0.010	YES
5	Alameda Street &	AM	0.586	A	0.589	A	0.003	0.789	C	0.791	C	0.002	No
	Olympic Boulevard	PM	0.804	D	0.806	D	0.002	1.055	F	1.057	F	0.002	No
6	Mateo Street &	AM	0.349	A	0.358	A	0.009	0.745	C	0.765	C	0.020	No
	7th Street	PM	0.436	A	0.466	A	0.030	1.008	F	1.038	F	0.030	YES
7	Santa Fe Avenue &	AM	0.420	A	0.468	A	0.048	0.861	D	0.914	E	0.053	YES
	7th Street	PM	0.592	A	0.621	B	0.029	1.062	F	1.091	F	0.029	YES
8	Santa Fe Avenue &	AM	0.487	A	0.505	A	0.018	0.731	C	0.767	C	0.036	No
	8th Street	PM	0.511	A	0.536	A	0.025	0.731	C	0.755	C	0.024	No
9	Santa Fe Avenue &	AM	0.546	A	0.562	A	0.016	0.774	C	0.791	C	0.017	No
	Porter Street	PM	0.738	C	0.759	C	0.021	0.972	E	0.993	E	0.021	YES
10	Santa Fe Avenue &	AM	0.771	C	0.784	C	0.013	0.995	E	1.011	F	0.016	YES
	Olympic Boulevard	PM	0.738	C	0.747	C	0.009	1.031	F	1.038	F	0.007	No
11	Santa Fe Avenue &	AM	0.662	B	0.666	B	0.004	0.736	C	0.739	C	0.003	No
	15th Street	PM	0.798	C	0.803	D	0.005	0.899	D	0.904	E	0.005	No

Table 8 (cont.)
Critical Movement Analysis (CMA) & Level of Service (LOS) Summary
Existing (2017) and Future (2022) Traffic Conditions

			Existing (2017) Conditions					Future (2022) Conditions					
		Peak	Existing		Plus Project			Without Project		With Project			
No.	Intersection	Hour	CMA	LOS	CMA	LOS	Impact	CMA	LOS	CMA	LOS	Impact	Sig.?
12	Soto Street &	AM	0.733	C	0.739	C	0.006	1.047	F	1.058	F	0.011	YES
	4th Street	PM	0.639	B	0.644	B	0.005	0.941	E	0.951	E	0.010	YES
13	Soto Street &	AM	0.629	B	0.635	B	0.006	0.896	D	0.907	E	0.011	YES
	Whittier Boulevard	PM	0.649	B	0.657	B	0.008	0.970	E	0.986	E	0.016	YES
14	Soto Street &	AM	0.760	C	0.769	C	0.009	0.974	E	0.979	E	0.005	No
	7th Street	PM	0.627	B	0.643	B	0.016	0.900	D	0.914	E	0.014	YES
15	Alameda Street &	AM	0.771	C	0.774	C	0.003	1.085	F	1.087	F	0.002	No
	6th Street	PM	0.704	C	0.706	C	0.002	1.185	F	1.189	F	0.004	No
16	Mateo Street &	AM	0.611	B	0.615	B	0.004	0.748	C	0.753	C	0.005	No
	6th Street	PM	0.529	A	0.547	A	0.018	0.909	E	0.927	E	0.018	YES
17	Boyle Avenue &	AM	0.654	B	0.669	B	0.015	0.797	C	0.813	D	0.016	No
	7th Street	PM	0.599	A	0.612	B	0.013	0.755	C	0.768	C	0.013	No
18	Soto Street &	AM	0.690	B	0.693	B	0.003	0.938	E	0.944	E	0.006	No
	1st Street	PM	0.709	C	0.715	C	0.006	1.033	F	1.041	F	0.008	No
19	Soto Street &	AM	0.652	B	0.654	B	0.002	0.881	D	0.883	D	0.002	No
	Olympic Boulevard	PM	0.648	B	0.651	B	0.003	0.867	D	0.869	D	0.002	No
20	Euclid Avenue &	AM	0.624	B	0.626	B	0.002	0.671	B	0.673	B	0.002	No
	Whittier Boulevard	PM	0.511	A	0.513	A	0.002	0.575	A	0.577	A	0.002	No
21	Molino Street/Merrick Street &	AM	0.591	A	0.595	A	0.004	0.767	C	0.772	C	0.005	No
	4th Street	PM	0.473	A	0.487	A	0.014	0.709	C	0.722	C	0.013	No

Table 5
Project Trip Generation Summary[1]

Land Use	ITE Code	Intensity[2]	Average Weekday	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total
Trip Generation Rates									
Apartment	220	1 du	6.65	20%	80%	0.51	65%	35%	0.62
Affordable Housing - Family[3]	--	1 du	4.08	40%	60%	0.50	55%	45%	0.34
General Office Building	710	1 ksf	See Note 4	88%	12%	Note 4	17%	83%	Note 4
Shopping Center	820	1 ksf	42.70	62%	38%	0.96	48%	52%	3.71
Trip Generation Summary									
Description		**Size**	**Average Weekday**	**AM Peak Hour In**	**AM Peak Hour Out**	**AM Peak Hour Total**	**PM Peak Hour In**	**PM Peak Hour Out**	**PM Peak Hour Total**
PROPOSED USES									
Residential									
Apartment		99 du	658	10	40	50	40	21	61
10% Internal Capture Adjustment[5]			(57)	0	(2)	(2)	(4)	(1)	(5)
Apartment With Internal Capture Adjustment Subtotal			601	10	38	48	36	20	56
10% Transit Adjustment[6]			(60)	(1)	(4)	(5)	(4)	(2)	(6)
Apartment With Transit Adjustment Subtotal			541	9	34	43	32	18	50
5% Walk Adjustment[7]			(27)	0	(2)	(2)	(2)	(1)	(3)
Apartment Total			514	9	32	41	30	17	47
Affordable Housing		11 du	45	2	4	6	2	2	4
10% Internal Capture Adjustment[5]			(4)	0	0	0	0	0	0
Affordable Housing With Internal Capture Adjustment Subtotal			41	2	4	6	2	2	4
10% Transit Adjustment[6]			(4)	0	0	0	0	0	0
Affordable Housing With Transit Adjustment Subtotal			37	2	4	6	2	2	4
5% Walk Adjustment[7]			(2)	0	0	0	0	0	0
Affordable Housing Total			35	2	4	6	2	2	4
Residential Total			549	11	36	47	32	19	51
Commercial									
General Office		113.350 ksf	1,444	187	25	212	35	170	205
10% Internal Capture Adjustment[5]			(125)	(1)	(1)	(2)	(4)	(7)	(11)
General Office With Internal Capture Adjustment Subtotal			1,319	186	24	210	31	163	194
10% Transit Adjustment[6]			(132)	(19)	(2)	(21)	(3)	(16)	(19)
General Office With Transit Adjustment Subtotal			1,187	167	22	189	28	147	175
5% Walk Adjustment[7]			(59)	(8)	(1)	(9)	(1)	(7)	(8)
General Office Total			1,128	159	21	180	27	140	167
Shopping Center		43.657 ksf	1,864	26	16	42	78	84	162
10% Internal Capture Adjustment[5]			(186)	(3)	(1)	(4)	(8)	(8)	(16)
Shopping Center With Internal Capture Adjustment Subtotal			1,678	23	15	38	70	76	146
10% Transit Adjustment[6]			(168)	(2)	(2)	(4)	(7)	(8)	(15)
Shopping Center With Transit Adjustment Subtotal			1,510	21	13	34	63	68	131
5% Walk Adjustment[7]			(76)	(1)	(1)	(2)	(3)	(3)	(6)
Shopping Center With Walk Adjustment Subtotal			1,434	20	12	32	60	65	125
50% Pass-By Adjustment[8]			(717)	(10)	(6)	(16)	(30)	(32)	(62)
Shopping Center Total			717	10	6	16	30	33	63
Commercial Total			1,845	169	27	196	57	173	230
Proposed Project Driveway Trips (including Pass-By Trips)			**3,111**	**190**	**69**	**259**	**119**	**224**	**343**
Proposed Project Trips			**2,394**	**180**	**63**	**243**	**89**	**192**	**281**

Notes:

1) ITE *Trip Generation Manual* (9th Edition, 2012) trip generation rates and equations for Land Use Codes 220 (Apartment), 710 (General Office Building) and 820 (Shopping Center) applied.
2) du = Dwelling Units; ksf = Thousands of Square Feet of Gross Floor Area or Gross Leasable Area.
3) Affordable housing (family) trip rates provided by LADOT, based on empirical surveys of 35 sites throughout the City of Los Angeles in early 2016.
4) Per the ITE *Trip Generation Manual*, the following fitted curve equations were used:
   Land Use Code 710 (General Office Building)
   Daily: Ln(T) = 0.76 Ln(X) + 3.68
   AM: Ln(T) = 0.80 Ln(X) + 1.57
   PM: T = 1.12(X) + 78.45
5) For Proposed uses, 10 percent internal capture adjustment assumed based on Shopping Center land use trips. Internal trips for the Residential and Office land uses are based on the Shopping Center land use category.
6) Consistent with current LADOT *Transportation Impact Study Guidelines*, a 10 percent transit adjustment has been assumed for all uses.
7) Given the Project location within the Arts District of Downtown Los Angeles, with a variety of residential, commercial, and industrial uses within walking distance, a 5 percent walk adjustment has been applied for all proposed uses.
8) Based on Attachment D of the current LADOT *Transportation Impact Study Guidelines*, appropriate pass-by trip adjustments have been applied to the Shopping Center land use category.

Table 10
Critical Movement Analysis (CMA) & Level of Service (LOS) Summary
Future (2022) With Mitigation Traffic Conditions

No.	Intersection	Peak Hour	Without Project		With Project			With Project + Mitigation		
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact
4	Alameda Street &	AM	0.791	C	0.793	C	0.002	0.793	C	0.002
	7th Street	PM	1.002	F	1.012	F	0.010 *	1.009	F	0.007
6	Mateo Street &	AM	0.745	C	0.765	C	0.020	0.729	C	-0.016
	7th Street	PM	1.008	F	1.038	F	0.030 *	1.004	F	-0.004
7	Santa Fe Avenue &	AM	0.861	D	0.914	E	0.053 *	0.862	D	0.001
	7th Street	PM	1.062	F	1.091	F	0.029 *	1.046	F	-0.016
9	Santa Fe Avenue &	AM	0.774	C	0.791	C	0.017	0.778	C	0.004
	Porter Street	PM	0.972	E	0.993	E	0.021 *	0.980	E	0.008
10	Santa Fe Avenue &	AM	0.995	E	1.011	F	0.016 *	0.999	E	0.004
	Olympic Boulevard	PM	1.031	F	1.038	F	0.007	1.027	F	-0.004
12	Soto Street &	AM	1.047	F	1.058	F	0.011 *	1.046	F	-0.001
	4th Street	PM	0.941	E	0.951	E	0.010 *	0.940	E	-0.001
13	Soto Street &	AM	0.896	D	0.907	E	0.011 *	0.906	E	0.010 *
	Whittier Boulevard	PM	0.970	E	0.986	E	0.016 *	0.983	E	0.013 *
14	Soto Street &	AM	0.974	E	0.979	E	0.005	0.968	E	-0.006
	7th Street	PM	0.900	D	0.914	E	0.014 *	0.902	E	0.002
16	Mateo Street &	AM	0.748	C	0.753	C	0.005	0.745	C	-0.003
	6th Street	PM	0.909	E	0.927	E	0.018 *	0.895	D	-0.014

Note: * indicates a significant Project traffic impact based on LADOT criteria.

Physical Improvements

To align with the goals outlined in the 2035 Mobility Plan, physical mitigation measures intended to increase vehicular roadway capacity are generally not accepted as viable mitigation strategies by the LADOT. However, given that the implementation of the comprehensive TDM plan, system signal upgrades, and shuttle service would not be expected to mitigate the anticipated Project traffic impacts to less-than-significant levels at the intersection of Soto Street & Whittier Boulevard, potential physical mitigation measures were also examined.

As detailed in the Highway System Improvements section of this report, the segment of Soto Street including the intersection with Whittier Boulevard is planned for the

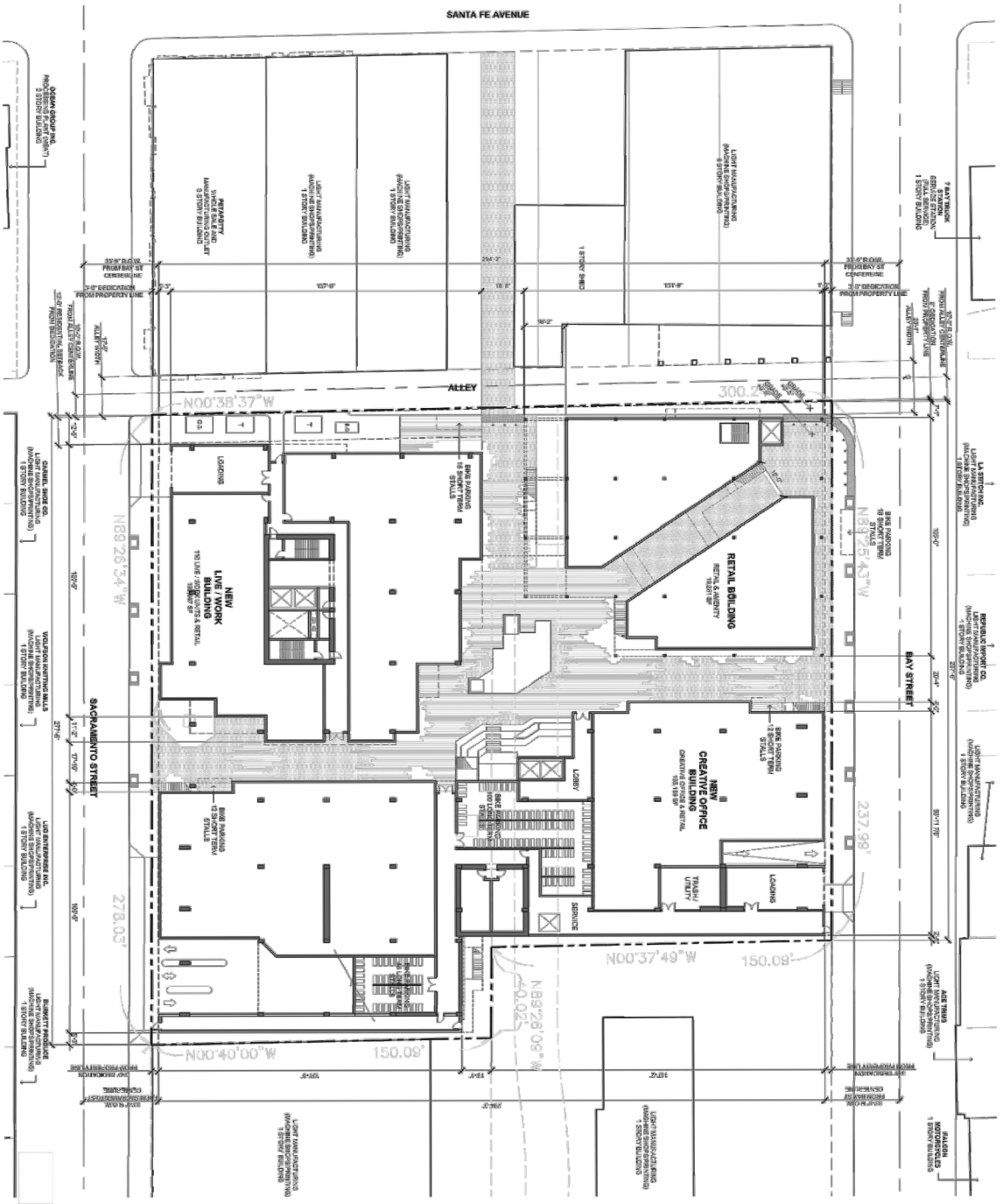


FIGURE 2

10/4/2017

I:\BaySt\(2110)MixedUse\2017-09\SITE-PLAN

CONCEPTUAL PROJECT SITE PLAN

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