



Major Projects & EIR Section

City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



INITIAL STUDY

SOUTHEAST LOS ANGELES COMMUNITY PLAN AREA

SOLA Village Project

Case No. ENV-2014-1773-EIR

Council District No. 9

**THIS DOCUMENT COMPRISES THE INITIAL STUDY ANALYSIS AS REQUIRED UNDER THE CALIFORNIA
ENVIRONMENTAL QUALITY ACT**

Project Address:

1900 South Broadway, Los Angeles, CA 90007

Project Description:

The Project consists of development of a mixed use project containing approximately 2,533,000 square feet of development in the [Q]M1-2-O and M1-2-O zones, including modifications to the existing 862,162 square foot, approximately 194 foot tall REEF Building, and construction of approximately 1,664,000 square feet of new development on the remainder of the Project Site currently occupied by surface parking lots and an 11,150 square foot warehouse/storage/distribution building. The REEF would be modified to incorporate a new restaurant and event space on the rooftop, and potentially convert existing wholesale/showroom space within The REEF to office, retail and restaurant uses. The existing warehouse building and surface parking lots would be demolished and replaced by new construction comprised of an integrated mixed-use development containing residential, hotel, retail/restaurant, grocery store, gallery, and fitness center uses, and community spaces which would be accommodated in multiple single- and multi-story buildings ranging in height from up to 85 feet to up to 420 feet, along with public open space areas. The Project would provide at least 2,733 parking spaces in multiple above-ground and subterranean structures. The Project would require various approvals, and the Project Applicant is requesting a General Plan Amendment, Zone Change, Zone Variances, a Signage Supplemental Use District, Site Plan Review, Conditional Use Permits, Vesting Tentative Tract Map, and a Development Agreement.

APPLICANT:

PHR LA MART LLC

PREPARED BY:

EcoTierra Consulting, Inc.

July 2014

SOLA Village Project
1900 S. BROADWAY

INITIAL STUDY

PREPARED FOR:
The City of Los Angeles
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012-2601

APPLICANT:
PHR LA MART LLC

PREPARED BY:
EcoTierra Consulting, Inc.
555 W. 5th Street, 31st Floor
Los Angeles, CA 90013

July 2014

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I. INTRODUCTION

The subject of this Initial Study is the proposed SOLA Village Project, a mixed use project containing approximately 2,533,000 square feet of development in the [Q]M1-2-O and M1-2-O zones, including modifications to the existing 862,162 square foot, approximately 194 foot tall REEF Building, and construction of approximately 1,664,000 square feet of new development on the remainder of the Project Site currently occupied by a warehouse use and surface parking lots (the “Project”). The Project is located within the Southeast Los Angeles Community Plan Area of the City of Los Angeles. The City of Los Angeles Department of City Planning is the Lead Agency under the California Environmental Quality Act (CEQA).

PROJECT INFORMATION

Project Title: SOLA Village Project

Project Location: 1900 S. Broadway
Los Angeles, CA 90007

Project Applicant: PHR LA MART LLC
1933 South Broadway, Suite 409
Los Angeles, CA 90007

Lead Agency: City of Los Angeles Department of City Planning
200 N. Spring St., Room 750
Los Angeles, CA 90012

ORGANIZATION OF INITIAL STUDY

This Initial Study is organized into four primary sections as follows:

Introduction: This section provides introductory information such as the project title, the project applicant and the lead agency for the project.

Project Description: This section provides a description of the environmental setting and the project, including project characteristics and environmental review requirements.

Initial Study Checklist: This section contains the completed City of Los Angeles Initial Study Checklist.

Environmental Impact Analysis: Each environmental issue identified in the Initial Study Checklist contains an assessment and discussion of impacts associated with each subject area. When the evaluation identifies potentially significant effects, as identified in the Initial Study Checklist, mitigation measures are provided to reduce such impacts to less than significant levels.

II. PROJECT DESCRIPTION

1. PROJECT APPLICANT

The Applicant for the SOLA Village Project (the “Project”) is PHR LA MART LLC.

2. PROJECT LOCATION

A. Project Site

The Project Site consists of two full city blocks comprising approximately 9.7 acres bounded by Washington Boulevard on the north, Hill Street to the west, 21st Street to the south, and Main Street to the east, in the Southeast Los Angeles Community Plan Area (see Figure II-1, Regional Vicinity and Project Location). Broadway bisects the Project Site into the East Block and the West Block (see Figure II-2, Aerial View of Project Site). The Project Site is currently occupied by the existing 861,162 square foot, 12-story with basement REEF building (formerly, the L.A Mart, hereinafter referred to as The REEF), surface parking lots and an 11,150 square foot warehouse/storage/distribution building.

B. Surrounding Land Uses

The Project Site is located in a heavily visited area of downtown Los Angeles. The Metro Blue Line runs along Washington Boulevard at the northern edge of the Project Site. The Blue Line Grand station is located in the median of Washington Boulevard at Olive Street, one block northwest of the Project Site. The land uses within the general vicinity of the Project Site are characterized by a mix of low- to high-intensity commercial, institutional and residential uses, which vary widely in building style and period of construction. The Los Angeles County Superior Courthouse is located immediately to the west of the Project Site across Hill Street. One block further to the west is the campus of the Los Angeles Trade Technical College (LATTC) which extends from Olive Street to Flower Street, south of Washington Boulevard. The approximately one block depth of the area north of the Project Site includes commercial, industrial and mixed-use buildings, along with surface parking lots. Buildings in this area are generally low-rise, one to two stories in height, with the exception of a mixed-use commercial building located immediately to the north of the Project Site at 1836 South Hill Street, which is 12 stories in height, and a four story building located across from the northeast corner of the Project Site at 1835 Main Street. The Santa Monica Freeway (I-10) runs east-west approximately one block north of the Project Site. The area east of the Project Site contains low rise industrial and commercial buildings. The Santee Education Complex and Frida Kahlo Continuation High School are located one block east of the Project Site, east of Los Angeles Street and south of Washington Boulevard. The area to the south of the Project Site contains commercial and industrial buildings, with a few mixed use buildings interspersed, and surface parking lots.

A. Land Use Plans/Zoning

The Project Site is located in the Southeast Los Angeles Community Plan Area of the City of Los Angeles. The Project Site is located within the Council District 9 Redevelopment Project area, the Central City Parking area, the Downtown Housing Incentive area, the Central City Revitalization Zone, and the Los Angeles State Enterprise Zone. The Community Plan designates the Project Site for Limited



Figure 1 Vicinity Map



■ Project Site
Source: Mac Maps, June 2014.

manufacturing development. The Project Site is zoned M1-2-O (manufacturing zone with oil drilling overlay). The zoning of the northern portion of the West Block includes a “Q” condition which establishes development standards for that portion of the Project Site.

3. EXISTING USES

Existing uses within the Project Site include The REEF, and a small warehouse building located at the northwest corner of Main Street and 21st Street, with the remainder of the site occupied by surface parking lots.

A. The REEF

Constructed in 1958, the LA Mart began as a wholesale/showroom facility for furniture, home and gift items marketed to retailers and other distributors. The building has been in continuous operation as a wholesale market in downtown Los Angeles since it was opened. The existing building is 12 stories plus a single-level basement and approximately 194 feet in height.

In the past few years, the facility has been evolving from a primarily wholesale operation to more diversified support of the design and manufacturing of home goods, and presentation of events and trade shows. Renamed The REEF in 2013, the facility now supports a variety of activities in the creative, design and wholesale fields and continues to evolve to meet the needs of the creative community.

Within the existing building, two floors, containing approximately 131,000 square feet, are leased to the Los Angeles County Department of Children and Family Services (DCFS) and are used for administrative functions. No public offices are located within this space. In addition, DCFS leases approximately 20,000 square feet on the ground floor of The REEF, which is used as a public intake center, with its entrance located on Broadway. In addition, the Los Angeles County District Attorney leases approximately 10,000 square feet within the building.

Approximately 120,000 square feet of The REEF is used for trade shows and other events, while the remainder of the building is primarily engaged for wholesale and showroom use (see Table II-1). The building contains a coffee bar/snack shop on the first floor that is ancillary to the other uses within the building.

B. 2015 Main Street

The building located at 2015 Main Street is an 11,150 square foot building constructed in 1978 which is currently used as a warehouse, storage and distribution facility for a fabric company.

C. Surface Parking Lots

The remainder of the Project Site is occupied by surface parking lots that provide the required parking supply for the current operations and activities at The REEF.

**Table II-1
Existing Uses**

Building	Use	Building Size (square feet)
The Reef	Wholesale/Showroom	589,898
	Mercantile/Event	120,000
	Office	151,264
	<i>Total</i>	<i>861,162</i>
2015 S Main St	Warehouse/Distribution	11,150
Total Existing On-Site Development		872,312
<i>Source: PHR LA MART LLC, 2014</i>		

4. PROJECT CHARACTERISTICS

The Project consists of demolition of the existing warehouse/distribution building, incorporation of modifications to The REEF building and construction of new development on the remainder of the Project Site currently occupied by the surface parking lots. The resulting development after completion of the Project is shown in Table II-2. The conceptual site plan for the Project is shown in Figure II-3.

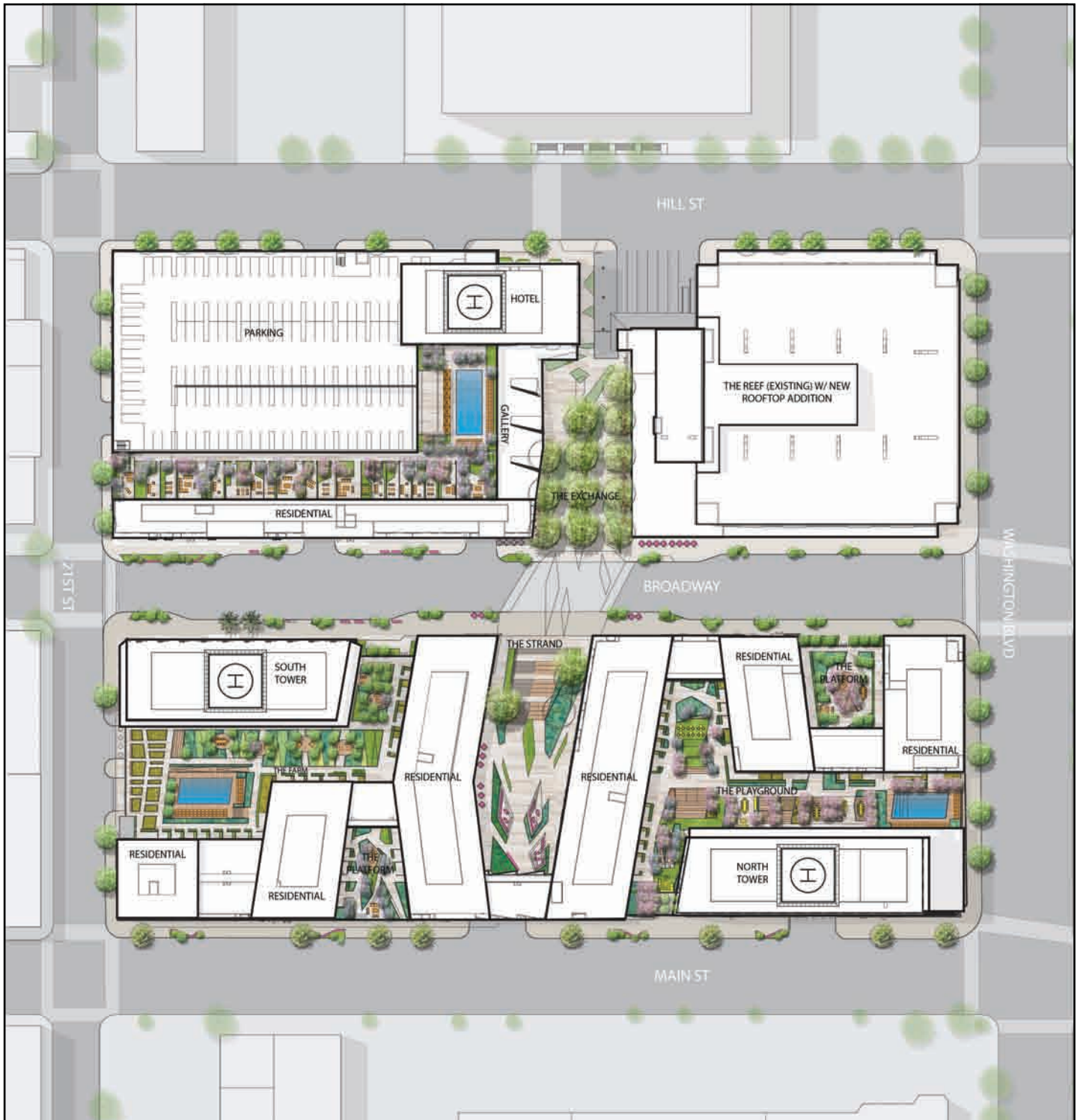
A. Modifications to The REEF Building

Under the Project, the existing REEF Building would be retained and expanded by approximately 8,000 square feet to incorporate a new restaurant and additional outdoor space to accommodate events on the rooftop. In addition, to accommodate the ongoing evolution of The REEF to support design, collaboration and development of new products, up to 180,000 square feet of the space within the existing building that is currently used for wholesale/showroom operations may be reconfigured into creative office space. Finally, on the ground floor, 30,000 square feet of wholesale/showroom space may be converted to: 1) 20,000 square feet of retail space; and 2) 10,000 square feet of restaurant space to serve the design, development, manufacturing, distribution, and exposition users who locate in The REEF in the future, as well as providing the same services to outside users.

B. New Development

The Project involves the demolition of the 2015 Main Street building, and removal of the existing surface parking lots and construction of a new mixed use development containing residential, hotel, retail/restaurant, grocery store, gallery and fitness center uses. The new development would be designed to provide an urban center with opportunities for people to live, work, shop, and visit in this area of downtown Los Angeles, with supporting services, entertainment venues and public spaces.

New construction would include approximately 1,664,000 square feet of floor area contained within a number of low-, mid-, and high-rise buildings. The Project's total square footage would be approximately 2,533,000 square feet of floor area. The Project's floor area ratio (FAR) would be at or below 6.0:1, which is the existing permitted FAR at the Project Site.



Source: Gensler + P-A-T-T-E-R-N-S, May 2014.

This new development would be constructed on both the East and West Blocks and would be phased to ensure uninterrupted operation of the existing uses within The REEF. Initial construction would take place on the West Block and would include construction of a new hotel up to 240 feet in height, with approximately 208 rooms, and a parking structure up to eight levels above grade, containing at least 1,375 parking spaces. In addition, a public gathering space with adjoining retail, restaurant, and gallery uses would be constructed just south of the entrance to The REEF. Up to 21 low-rise live/work residential units would also be constructed along the eastern edge of the West Block along Broadway. The parking structure would serve the hotel, residential units and commercial uses within the West Block and the uses within The REEF, and would be completed before the surface parking on the East Block is removed.

Construction on the East Block would include two high-rise towers containing the condominium units that would be located on the northeast and southwest corners of the East Block. These buildings would be up to 35 stories (420 feet) in height and would contain up to 895 new residential condominium units. Up to 528 residential rental units would be provided in multiple mid-rise buildings of up to 6 stories (85 feet) in height to be constructed on the remainder of the East Block, with a central plaza, retail and restaurant uses, a grocery store, gallery and fitness center provided on the ground level. This plaza would connect to the corresponding space within the West Block, providing a central pedestrian courtyard area extending from Hill Street to Main Street through the Project Site. A pedestrian crossing would be provided on Broadway at this location to facilitate pedestrian circulation between the two blocks.

Parking for the new development on the East Block would be provided in a subterranean parking structure of up to four levels that would provide at least 1,358 parking spaces. This parking would serve the residential, commercial, and grocery store uses within the West Block, as well as providing additional parking for uses and events within The REEF.

C. Access and Parking

Access to the Project Site would be designed to be pedestrian-friendly and promote access to the Project from the nearby transit station. Pedestrian amenities including 20-foot wide sidewalks, landscaping and setbacks would be provided along the Hill Street and Main Street edges of the Project Site. Both sides of Broadway through the Project Site would be designed to provide for an enhanced pedestrian experience with particular emphasis on the mid-block crossing at the center of the East and West blocks. This area would provide appropriate signalization, at least 20-foot wide sidewalks, and entryways set back from the sidewalk that provide welcoming entrances into the Project at these locations. With this design, the Project would provide a nearly seamless crossing from the Courthouse on the west to Main Street on the east, which would also be the location of the grocery store. The landscaped paseos that will be designed into the Project are intended to facilitate pedestrian flow within and through the Project Site. Vehicle access to the Project Site would be provided primarily from Hill Street, Main Street and 21st Street, with limited access from Broadway into the parking structure on the West Block. The loading area for The REEF would remain in its current location on Hill Street. No automobile access would be provided from Washington Boulevard.

**Table II-2
Project Uses**

Building	Use	Building Size	Change from Existing
The Reef	Wholesale/Showroom	372,898 sf	-217,000
	Mercantile/Event	127,000 sf	+7,000
	Office	331,264 sf	+180,000
	Restaurant	18,000 sf	+18,000
	Retail	20,000 sf	+20,000
	<i>Total</i>	<i>869,162 sf</i>	<i>+8,000</i>
New Development	Residential (Apartment)	528 units	+528
	Residential (Condo)	895 units	+895
	Residential (Live/Work)	21 units	+21
	Retail	40,045 sf	+40,045
	Grocery Store	29,355 sf	+29,355
	Restaurant	27,657 sf	+27,657
	Hotel	208 rooms	+208
	Gallery	17,507 sf	+17,507
	Fitness/Yoga Studio	7,879 sf	+7,879
<i>Source: Gensler, 2014</i> <i>Sf=square feet</i>			

Changes in the levels of development on the Project Site that would occur under the Proposed Project are shown in Table II-3.

**Table II-3
Net New Development**

Use	Change
<i>Uses Added</i>	
Residential (Apartment)	+528 units
Residential (Condo)	+895 units
Residential (Live/Work)	+21 units
Hotel	+208 rooms
Office	+180,000 sf
Retail	+60,045 sf
Grocery Store	+29,355 sf
Restaurant	+45,657 sf
Gallery	+15,507 sf
Fitness/Yoga Studio	+7,879 sf
<i>Uses Removed</i>	
Wholesale/Showroom	-217,000 sf
Warehouse/Distribution	-11,150 sf
<i>Source: Gensler, 2014</i>	

D. Equivalency Program

In order to provide flexibility to allow for changes in the Project in the future to respond to changing market conditions, an environmental equivalency program and design flexibility program are included in the Project that is designed to establish a set of rules for land use exchanges within the Project in the future that would be analyzed in the Draft EIR and adopted as part of the Project approvals, such that exchanges taking place in the future in accordance with these rules would not require discretionary approvals by the City or additional environmental review.

E. Project Signage

The Project would include a Supplemental Use District for signage (Sign District). Signage regulations included in the Sign District set forth the requirements governing the allowable sign types, locations, maximum size or coverage, hours of operation, and type of animation or controlled refresh for new signage. The Sign District would act as a medium to promote more creative displays at the street level and above, while at the same time providing retail, restaurant, and office tenants with additional incentives for locating their businesses within the Project Site. The Sign District would permit next-generation integrated digital lighting around: (i) three sides of the existing REEF building; (ii) the north face of the north residential tower; (iii) all four sides of the south residential tower; and (iv) all four sides of the hotel building.

F. Construction

The Project would be constructed over approximately 60 months. Construction of the West Block, including demolition, grading, and construction, is expected to require approximately 30 months, while construction of the East Block, including demolition, excavation, and construction, would require approximately 32 months. Construction of the East Block would not begin until the parking structure on the West Block is complete and open. Construction activities on the East Block and West Block could overlap by a few months once the parking structure is open, but finishing activities on the West Block are not yet complete. Demolition of the existing parking lot on the West Block could begin in 2016, with completion projected by the end of 2021. The Project would require the net export of material from the Site and a haul route permit. The likely haul route for the Project would utilize Washington Boulevard and Main Street to access the Santa Monica Freeway, with exported materials disposed at the Puente Hills landfill in Whittier, and/or the Atkinson Brickyard site in Compton.

5. DISCRETIONARY ACTIONS AND APPROVALS

The City of Los Angeles Planning Department is the lead agency for the Project. In order to permit development of the Project, the City may require approval of one or more of the following discretionary actions:

- General Plan Amendment.
- Vesting Zone Change.
- Supplemental Use District (SN) for Signage.
- Vesting Conditional Use Permit(s) - FAR Averaging, Major Development Project.
- Master Conditional Use Permit for on- and off-site sale, dispensing and consumption of alcoholic beverages.

- Master Conditional Use Permit for live entertainment and dancing.
- Zone Variance related to open space requirements.
- Zone Variance to allow health/fitness club.
- Zone Variance to allow outdoor dining.
- Vesting Tentative Tract Map.
- Site Plan Review.
- Development Agreement.
- Other permits, ministerial or discretionary, may be necessary in order to execute and implement the Project. Such approvals may include, but are not limited to: landscaping approvals, exterior approvals, permits for driveway curb cuts, storm water discharge permits, grading permits, and installation and hookup approvals for public utilities and related permits.

Federal, state, and regional agencies that may have jurisdiction over some aspect the project include, but are not limited to:

- Regional Water Quality Board; and
- South Coast Air Quality Management District.

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT

LEAD CITY AGENCY:

City of Los Angeles, Department of City Planning

COUNCIL DISTRICT:

CD 9 – CURREN D. PRICE, JR.

PROJECT TITLE:

SOLA Village

ENVIRONMENTAL CASE:

ENV-2014-1773-EIR

CASE NO.

CPC-2014-1771-GPA-VZC-SN-VCU-MCUP-CUX-ZV-SPR; CPC-2014-1772-DA

PROJECT LOCATION: 1900 S. Broadway

PROJECT DESCRIPTION:

The Project consists of development of a mixed use project containing approximately 2,533,000 square feet of development in the [Q]M1-2-O and M1-2-O zones, including modifications to the existing 862,162 square foot, approximately 194 foot tall REEF Building, and construction of approximately 1,664,000 square feet of new development on the remainder of the Project Site currently occupied by a warehouse use and surface parking lots. The REEF would be modified to incorporate a new restaurant and event space on the rooftop, and potentially convert existing wholesale/showroom space within the REEF to office, retail and restaurant uses. The existing warehouse building and surface parking lots would be demolished and replaced by new construction comprised of an integrated mixed-use development containing residential, hotel, retail/restaurant, grocery store, gallery, and fitness center uses and community spaces which would be accommodated in multiple single- and multi-story buildings ranging in height from up to 85 feet to up to 420 feet, along with public open space areas. The Project would provide at least 2,733 parking spaces in multiple above-ground and subterranean structures. The applicant is requesting: (1) General Plan Amendment; (2) Vesting Zone Change; (3) Supplemental Use District (SN) for Signage; (4) Vesting Conditional Use Permits for Major Project and FAR Averaging; (5) Master Conditional Use Permits for alcoholic beverages and live entertainment; (6) Zone Variances for open space, health/fitness club and outdoor dining; (7) Site Plan Review; (8) Vesting Tentative Tract Map; and (9) a Development Agreement.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY

PHR LA MART LLC
1933 South Broadway, Suite 409
Los Angeles, CA 90007

FINDING:

The Department of City Planning of the City of Los Angeles finds that the Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING FORM

Erin Strellich

TITLE

Planning Assistant

TELEPHONE NUMBER

(213) 978-1351

ADDRESS

200 North Spring Street
Major Projects & EIR, Room 750
Los Angeles, CA 90012

SIGNATURE (Official)

DATE

July 16, 2014

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY and CHECKLIST (CEQA Guidelines Section 15063)

LEAD CITY AGENCY: City of Los Angeles	COUNCIL DISTRICT: CD 9 – CURREN D. PRICE, JR.	DATE: July 2014
RESPONSIBLE AGENCIES: Department of City Planning		
ENVIRONMENTAL CASE: ENV-2014-1773-EIR	RELATED CASES: CPC-2014-1771-GPA-VZC-SN-VCU-MCUP-CUX-ZV-SPR; CPC-2014-1772-DA	
PREVIOUS ACTIONS CASE NO. None	<input type="checkbox"/> DOES have significant changes from previous actions. <input type="checkbox"/> DOES NOT have significant changes from previous actions.	
PROJECT DESCRIPTION: General Plan Amendment; Vesting Zone Change; Supplemental Use District (SN) For Signage; Vesting Conditional Use Permits For Major Project And Floor Area Averaging; Master Conditional Use Permits For Alcoholic Beverages And Live Entertainment; Zone Variances For Open Space, Health/Fitness Club And Outdoor Dining; Site Plan Review; Vesting Tentative Tract Map; And Development Agreement.		
ENV PROJECT DESCRIPTION: The Project consists of development of a mixed use project containing approximately 2,533,000 square feet of development in the [Q]M1-2-O and M1-2-O zones, including modifications to the existing 862,162 square foot, approximately 194 foot tall REEF Building, and construction of approximately 1,664,000 square feet of new development on the remainder of the Project Site currently occupied by surface parking lots and an 11,150 square foot warehouse/storage/distribution building. The REEF would be modified to incorporate a new restaurant and event space on the rooftop, and potentially convert existing wholesale/showroom space within the REEF to office, retail and restaurant uses. The existing warehouse building and surface parking lots would be demolished and replaced by new construction comprised of an integrated mixed-use development containing residential, hotel, retail/restaurant, grocery store, gallery, and fitness center uses and community spaces which would be accommodated in multiple single- and multi-story buildings ranging in height from up to 85 feet to up to 420 feet, along with public open space areas. The Project would provide at least 2,733 parking spaces in multiple above-ground and subterranean structures.		
ENVIRONMENTAL SETTING: The Project Site is approximately 9.7 acres (422,532 square feet); it is developed with the 861,162 square foot REEF building (formerly L.A. Mart), surface parking lots and an 11,150 square foot warehouse building. The Project Site is located in a heavily visited area of downtown Los Angeles approximately one block south of the I-10 Freeway. The land uses within the general vicinity of the Project Site are characterized by a mix of low- to high-intensity commercial, institutional and residential uses, which vary widely in building style and period of construction.		
PROJECT LOCATION: 1900 S. Broadway		
COMMUNITY PLAN AREA: Southeast Los Angeles STATUS: <input type="checkbox"/> Preliminary <input type="checkbox"/> Proposed <input checked="" type="checkbox"/> ADOPTED in 2000	<input type="checkbox"/> Does Conform to Plan <input checked="" type="checkbox"/> Does NOT Conform to Plan	AREA PLANNING COMMISSION: South Los Angeles CERTIFIED NEIGHBORHOOD COUNCIL: South Central
EXISTING ZONING: [Q]M1-2-O and M1-2-O	MAX DENSITY ZONING: 6.0:1	LA River Adjacent: No

GENERAL PLAN LAND USE: Limited Manufacturing	MAX. DENSITY PLAN: 6.0:1	
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Determination (To be completed by Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

<u>Erin Strellich</u>	<u>Planning Assistant</u>	<u>(213) 978-1351</u>
Signature	Title	Phone

Evaluation of Environmental Impacts:

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross referenced).

5. Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
7. Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whichever format is selected.
9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significant.

Environmental Factors Potentially Affected:

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

<input checked="" type="checkbox"/> AESTHETICS <input type="checkbox"/> AGRICULTURE AND FOREST RESOURCES <input checked="" type="checkbox"/> AIR QUALITY <input checked="" type="checkbox"/> BIOLOGICAL RESOURCES <input checked="" type="checkbox"/> CULTURAL RESOURCES <input checked="" type="checkbox"/> GEOLOGY AND SOILS	<input checked="" type="checkbox"/> GREENHOUSE GAS EMISSIONS <input checked="" type="checkbox"/> HAZARDS AND HAZARDOUS MATERIALS <input checked="" type="checkbox"/> HYDROLOGY AND WATER QUALITY <input checked="" type="checkbox"/> LAND USE AND PLANNING <input type="checkbox"/> MINERAL RESOURCES <input checked="" type="checkbox"/> NOISE	<input checked="" type="checkbox"/> POPULATION AND HOUSING <input checked="" type="checkbox"/> PUBLIC SERVICES <input checked="" type="checkbox"/> RECREATION <input checked="" type="checkbox"/> TRANSPORTATION/CIRCULATION <input checked="" type="checkbox"/> UTILITIES <input checked="" type="checkbox"/> MANDATORY FINDINGS OF SIGNIFICANCE
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INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

Background

PROPONENT NAME:

PHR LA MART LLC

PHONE NUMBER:

213-229-9548

APPLICANT ADDRESS:

1933 South Broadway, Suite 409
Los Angeles, CA 90007

AGENCY REQUIRING CHECKLIST:

Department of City Planning

DATE SUBMITTED:

July 16, 2014

PROPOSAL NAME (If Applicable):

SOLA Village Project

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>PLEASE NOTE THAT EACH AND EVERY RESPONSE IN THE CITY OF LOS ANGELES INITIAL STUDY AND CHECKLIST IS SUMMARIZED FROM AND BASED UPON THE ENVIRONMENTAL ANALYSIS CONTAINED IN ATTACHEMENT B, EXPLANATION OF CHECKLIST DETERMINATIONS. PLEASE REFER TO THE APPLICABLE RESPONSE IN ATTACHMENT B FOR A DETAILED DISCUSSION OF CHECKLIST DETERMINATIONS.</p>					
I. AESTHETICS					
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SCENIC VISTA?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	SUBSTANTIALLY DAMAGE SCENIC RESOURCES, INCLUDING, BUT NOT LIMITED TO, TREES, ROCK OUTCROPPINGS, AND HISTORIC BUILDINGS, OR OTHER LOCALLY RECOGNIZED DESIRABLE AESTHETIC NATURAL FEATURE WITHIN A CITY-DESIGNATED SCENIC HIGHWAY?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	SUBSTANTIALLY DEGRADE THE EXISTING VISUAL CHARACTER OR QUALITY OF THE SITE AND ITS SURROUNDINGS?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	CREATE A NEW SOURCE OF SUBSTANTIAL LIGHT OR GLARE WHICH WOULD ADVERSELY AFFECT DAY OR NIGHTTIME VIEWS IN THE AREA?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
II. AGRICULTURE AND FOREST RESOURCES					
a.	CONVERT PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE, AS SHOWN ON THE MAPS PREPARED PURSUANT TO THE FARMLAND MAPPING AND MONITORING PROGRAM OF THE CALIFORNIA RESOURCES AGENCY, TO NON-AGRICULTURAL USE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	CONFLICT WITH EXISTING ZONING FOR AGRICULTURAL USE, OR A WILLIAMSON ACT CONTRACT?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	CONFLICT WITH EXISTING ZONING FOR, OR CAUSE REZONING OF, FOREST LAND (AS DEFINED IN PUBLIC RESOURCES CODE SECTION 1220(G)), TIMBERLAND (AS DEFINED BY PUBLIC RESOURCES CODE SECTION 4526), OR TIMBERLAND ZONED TIMBERLAND PRODUCTION (AS DEFINED BY GOVERNMENT CODE SECTION 51104(G))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	RESULT IN THE LOSS OF FOREST LAND OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	INVOLVE OTHER CHANGES IN THE EXISTING ENVIRONMENT WHICH, DUE TO THEIR LOCATION OR NATURE, COULD RESULT IN CONVERSION OF FARMLAND, TO NON-AGRICULTURAL USE OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
III. AIR QUALITY					
a.	CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE SCAQMD OR CONGESTION MANAGEMENT PLAN?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	VIOLATE ANY AIR QUALITY STANDARD OR CONTRIBUTE SUBSTANTIALLY TO AN EXISTING OR PROJECTED AIR QUALITY VIOLATION?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE AIR BASIN IS NON-ATTAINMENT (OZONE, CARBON MONOXIDE, & PM 10) UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e.	CREATE OBJECTIONABLE ODORS AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IV. BIOLOGICAL RESOURCES					
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT, EITHER DIRECTLY OR THROUGH HABITAT MODIFICATION, ON ANY SPECIES IDENTIFIED AS A CANDIDATE, SENSITIVE, OR SPECIAL STATUS SPECIES IN LOCAL OR REGIONAL PLANS, POLICIES, OR REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON ANY RIPARIAN HABITAT OR OTHER SENSITIVE NATURAL COMMUNITY IDENTIFIED IN THE CITY OR REGIONAL PLANS, POLICIES, REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON FEDERALLY PROTECTED WETLANDS AS DEFINED BY SECTION 404 OF THE CLEAN WATER ACT (INCLUDING, BUT NOT LIMITED TO, MARSH VERNAL POOL, COASTAL, ETC.) THROUGH DIRECT REMOVAL, FILLING, HYDROLOGICAL INTERRUPTION, OR OTHER MEANS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	INTERFERE SUBSTANTIALLY WITH THE MOVEMENT OF ANY NATIVE RESIDENT OR MIGRATORY FISH OR WILDLIFE SPECIES OR WITH ESTABLISHED NATIVE RESIDENT OR MIGRATORY WILDLIFE CORRIDORS, OR IMPEDE THE USE OF NATIVE WILDLIFE NURSERY SITES?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	CONFLICT WITH ANY LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES, SUCH AS TREE PRESERVATION POLICY OR ORDINANCE (E.G., OAK TREES OR CALIFORNIA WALNUT WOODLANDS)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f.	CONFLICT WITH THE PROVISIONS OF AN ADOPTED HABITAT CONSERVATION PLAN, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
V. CULTURAL RESOURCES					
a.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF A HISTORICAL RESOURCE AS DEFINED IN STATE CEQA SECTION 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO STATE CEQA SECTION 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	DIRECTLY OR INDIRECTLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE OR SITE OR UNIQUE GEOLOGIC FEATURE?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	DISTURB ANY HUMAN REMAINS, INCLUDING THOSE INTERRED OUTSIDE OF FORMAL CEMETERIES?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VI. GEOLOGY AND SOILS					
a.	EXPOSURE OF PEOPLE OR STRUCTURES TO POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY OR DEATH INVOLVING:				
i.	RUPTURE OF A KNOWN EARTHQUAKE FAULT, AS DELINEATED ON THE MOST RECENT ALQUIST-PRIOLO EARTHQUAKE FAULT ZONING MAP ISSUED BY THE STATE GEOLOGIST FOR THE AREA OR BASED ON OTHER SUBSTANTIAL EVIDENCE OF A KNOWN FAULT? REFER TO DIVISION OF MINES AND GEOLOGY SPECIAL PUBLICATION 42.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii.	STRONG SEISMIC GROUND SHAKING?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii.	SEISMIC-RELATED GROUND FAILURE, INCLUDING LIQUEFACTION?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv.	LANDSLIDES?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

c.	BE LOCATED ON A GEOLOGIC UNIT OR SOIL THAT IS UNSTABLE, OR THAT WOULD BECOME UNSTABLE AS A RESULT OF THE PROJECT, AND POTENTIAL RESULT IN ON- OR OFF-SITE LANDSLIDE, LATERAL SPREADING, SUBSIDENCE, LIQUEFACTION, OR COLLAPSE?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	BE LOCATED ON EXPANSIVE SOIL, AS DEFINED IN TABLE 18-1-B OF THE UNIFORM BUILDING CODE (1994), CREATING SUBSTANTIAL RISKS TO LIFE OR PROPERTY?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e.	HAVE SOILS INCAPABLE OF ADEQUATELY SUPPORTING THE USE OF SEPTIC TANKS OR ALTERNATIVE WASTE WATER DISPOSAL SYSTEMS WHERE SEWERS ARE NOT AVAILABLE FOR THE DISPOSAL OF WASTE WATER?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VII. GREENHOUSE GAS EMISSIONS					
a.	GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	CONFLICT WITH AN APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VIII. HAZARDS AND HAZARDOUS MATERIALS					
a.	CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	EMIT HAZARDOUS EMISSIONS OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	BE LOCATED ON A SITE WHICH IS INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES COMPILED PURSUANT TO GOVERNMENT CODE SECTION 65962.5 AND, AS A RESULT, WOULD IT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e.	FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT RESULT IN A SAFETY HAZARD FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT RESULT IN A SAFETY HAZARD FOR THE PEOPLE RESIDING OR WORKING IN THE AREA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g.	IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h.	EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY OR DEATH INVOLVING WILDLAND FIRES, INCLUDING WHERE WILDLANDS ARE ADJACENT TO URBANIZED AREAS OR WHERE RESIDENCES ARE INTERMIXED WITH WILDLANDS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IX. HYDROLOGY AND WATER QUALITY					
a.	VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	SUBSTANTIALLY DEplete GROUNDWATER SUPPLIES OR INTERFERE WITH GROUNDWATER RECHARGE SUCH THAT THERE WOULD BE A NET DEFICIT IN AQUIFER VOLUME OR A LOWERING OF THE LOCAL	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	GROUNDWATER TABLE LEVEL (E.G., THE PRODUCTION RATE OF PRE-EXISTING NEARBY WELLS WOULD DROP TO A LEVEL WHICH WOULD NOT SUPPORT EXISTING LAND USES OR PLANNED LAND USES FOR WHICH PERMITS HAVE BEEN GRANTED)?				
c.	SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON- OR OFF-SITE?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, OR SUBSTANTIALLY INCREASE THE RATE OR AMOUNT OF SURFACE RUNOFF IN AN MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFF SITE?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e.	CREATE OR CONTRIBUTE RUNOFF WATER WHICH WOULD EXCEED THE CAPACITY OF EXISTING OR PLANNED STORMWATER DRAINAGE SYSTEMS OR PROVIDE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f.	OTHERWISE SUBSTANTIALLY DEGRADE WATER QUALITY?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g.	PLACE HOUSING WITHIN A 100-YEAR FLOOD PLAIN AS MAPPED ON FEDERAL FLOOD HAZARD BOUNDARY OR FLOOD INSURANCE RATE MAP OR OTHER FLOOD HAZARD DELINEATION MAP?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h.	PLACE WITHIN A 100-YEAR FLOOD PLAIN STRUCTURES WHICH WOULD IMPEDE OR REDIRECT FLOOD FLOWS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i.	EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY OR DEATH INVOLVING FLOODING, INCLUDING FLOODING AS A RESULT OF THE FAILURE OF A LEVEE OR DAM?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j.	INUNDATION BY SEICHE, TSUNAMI, OR MUDFLOW?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
X. LAND USE AND PLANNING					
a.	PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	CONFLICT WITH APPLICABLE LAND USE PLAN, POLICY OR REGULATION OF AN AGENCY WITH JURISDICTION OVER THE PROJECT (INCLUDING BUT NOT LIMITED TO THE GENERAL PLAN, SPECIFIC PLAN, COASTAL PROGRAM, OR ZONING ORDINANCE) ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	CONFLICT WITH ANY APPLICABLE HABITAT CONSERVATION PLAN OR NATURAL COMMUNITY CONSERVATION PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XI. MINERAL RESOURCES					
a.	RESULT IN THE LOSS OF AVAILABILITY OF A KNOWN MINERAL RESOURCE THAT WOULD BE OF VALUE TO THE REGION AND THE RESIDENTS OF THE STATE?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	RESULT IN THE LOSS OF AVAILABILITY OF A LOCALLY-IMPORTANT MINERAL RESOURCE RECOVERY SITE DELINEATED ON A LOCAL GENERAL PLAN, SPECIFIC PLAN, OR OTHER LAND USE PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XII. NOISE					
a.	EXPOSURE OF PERSONS TO OR GENERATION OF NOISE IN LEVEL IN EXCESS OF STANDARDS ESTABLISHED IN THE LOCAL GENERAL PLAN OR NOISE ORDINANCE, OR APPLICABLE STANDARDS OF OTHER AGENCIES?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	EXPOSURE OF PEOPLE TO OR GENERATION OF EXCESSIVE GROUND BORNE VIBRATION OR GROUND BORNE NOISE LEVELS?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	A SUBSTANTIAL PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

d.	A SUBSTANTIAL TEMPORARY OR PERIODIC INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e.	FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XIII. POPULATION AND HOUSING					
a.	INDUCE SUBSTANTIAL POPULATION GROWTH IN AN AREA EITHER DIRECTLY (FOR EXAMPLE, BY PROPOSING NEW HOMES AND BUSINESSES) OR INDIRECTLY (FOR EXAMPLE, THROUGH EXTENSION OF ROADS OR OTHER INFRASTRUCTURE)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	DISPLACE SUBSTANTIAL NUMBERS OF EXISTING HOUSING NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	DISPLACE SUBSTANTIAL NUMBERS OF PEOPLE NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XIV. PUBLIC SERVICES					
a.	FIRE PROTECTION?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	POLICE PROTECTION?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	SCHOOLS?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	PARKS?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e.	OTHER PUBLIC FACILITIES?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XV. RECREATION					
a.	WOULD THE PROJECT INCREASE THE USE OF EXISTING NEIGHBORHOOD AND REGIONAL PARKS OR OTHER RECREATIONAL FACILITIES SUCH THAT SUBSTANTIAL PHYSICAL DETERIORATION OF THE FACILITY WOULD OCCUR OR BE ACCELERATED?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	DOES THE PROJECT INCLUDE RECREATIONAL FACILITIES OR REQUIRE THE CONSTRUCTION OR EXPANSION OF RECREATIONAL FACILITIES WHICH MIGHT HAVE AN ADVERSE PHYSICAL EFFECT ON THE ENVIRONMENT?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XVI. TRANSPORTATION/CIRCULATION					
a.	CONFLICT WITH AN APPLICABLE PLAN, ORDINANCE OR POLICY ESTABLISHING MEASURES OF EFFECTIVENESS FOR THE PERFORMANCE OF THE CIRCULATION SYSTEM, TAKING INTO ACCOUNT ALL MODES OF TRANSPORTATION INCLUDING MASS TRANSIT AND NON-MOTORIZED TRAVEL AND RELEVANT COMPONENTS OF THE CIRCULATION SYSTEM, INCLUDING BUT NOT LIMITED TO INTERSECTIONS, STREETS, HIGHWAYS AND FREEWAYS, PEDESTRIAN AND BICYCLE PATHS AND MASS TRANSIT?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	CONFLICT WITH AN APPLICABLE CONGESTION MANAGEMENT PROGRAM, INCLUDING BUT NOT LIMITED TO LEVEL OF SERVICE STANDARDS AND TRAVEL DEMAND MEASURES, OR OTHER STANDARDS ESTABLISHED BY THE COUNTY CONGESTION MANAGEMENT AGENCY FOR DESIGNATED ROADS OR HIGHWAYS?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	RESULT IN A CHANGE IN AIR TRAFFIC PATTERNS, INCLUDING EITHER AN INCREASE IN TRAFFIC LEVELS OR A CHANGE IN LOCATION THAT RESULTS IN SUBSTANTIAL SAFETY RISKS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	SUBSTANTIALLY INCREASE HAZARDS TO A DESIGN FEATURE (E.G.,	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT)?				
e.	RESULT IN INADEQUATE EMERGENCY ACCESS?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f.	CONFLICT WITH ADOPTED POLICIES, PLANS OR PROGRAMS REGARDING PUBLIC TRANSIT, BICYCLE, OR PEDESTRIAN FACILITIES, OR OTHERWISE DECREASE THE PERFORMANCE OR SAFETY OF SUCH FACILITIES?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XVII. UTILITIES					
a.	EXCEED WASTEWATER TREATMENT REQUIREMENTS OF THE APPLICABLE REGIONAL WATER QUALITY CONTROL BOARD?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	REQUIRE OR RESULT IN THE CONSTRUCTION OF NEW WATER OR WASTEWATER TREATMENT FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	REQUIRE OR RESULT IN THE CONSTRUCTION OF NEW STORMWATER DRAINAGE FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	HAVE SUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROJECT FROM EXISTING ENTITLEMENTS AND RESOURCE, OR ARE NEW OR EXPANDED ENTITLEMENTS NEEDED?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e.	RESULT IN A DETERMINATION BY THE WASTEWATER TREATMENT PROVIDER WHICH SERVES OR MAY SERVE THE PROJECT THAT IT HAS ADEQUATE CAPACITY TO SERVE THE PROJECT'S PROJECTED DEMAND IN ADDITION TO THE PROVIDER'S EXISTING COMMITMENTS?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f.	BE SERVED BY A LANDFILL WITH SUFFICIENT PERMITTED CAPACITY TO ACCOMMODATE THE PROJECT'S SOLID WASTE DISPOSAL NEEDS?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g.	COMPLY WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE					
a.	DOES THE PROJECT HAVE THE POTENTIAL TO DEGRADE THE QUALITY OF THE ENVIRONMENT, SUBSTANTIALLY REDUCE THE HABITAT OF FISH OR WILDLIFE SPECIES, CAUSE A FISH OR WILDLIFE POPULATION TO DROP BELOW SELF-SUSTAINING LEVELS, THREATEN TO ELIMINATE A PLANT OR ANIMAL COMMUNITY, REDUCE THE NUMBER OR RESTRICT THE RANGE OF A RARE OR ENDANGERED PLANT OR ANIMAL OR ELIMINATE IMPORTANT EXAMPLES OF THE MAJOR PERIODS OF CALIFORNIA HISTORY OR PREHISTORY?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	DOES THE PROJECT HAVE IMPACTS WHICH ARE INDIVIDUALLY LIMITED, BUT CUMULATIVELY CONSIDERABLE? ("CUMULATIVELY CONSIDERABLE" MEANS THAT THE INCREMENTAL EFFECTS OF AN INDIVIDUAL PROJECT ARE CONSIDERABLE WHEN VIEWED IN CONNECTION WITH THE EFFECTS OF PAST PROJECTS, THE EFFECTS OF OTHER CURRENT PROJECTS, AND THE EFFECTS OF PROBABLE FUTURE PROJECTS).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	DOES THE PROJECT HAVE ENVIRONMENTAL EFFECTS WHICH CAUSE SUBSTANTIAL ADVERSE EFFECTS ON HUMAN BEINGS, EITHER DIRECTLY OR INDIRECTLY?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF THE ENVIRONMENTAL EVALUATION (Attach additional sheets if necessary)

The Environmental Impact Assessment includes the use of official City of Los Angeles and other government source reference materials related to various environmental impact categories (e.g., Hydrology, Air Quality, Biology, Cultural Resources, etc.). The State of California, Department of Conservation, Division of Mines and Geology – Seismic Hazard Maps and reports, are used to identify potential future significant seismic events; including probable magnitudes, liquefaction, and landslide hazards. Based on Applicant information provided in the Master Land Use Application and Environmental Assessment Form, impact evaluations were based on stated facts contained therein, including but not limited to, reference materials indicated above, field investigation of the Project Site, and other reliable reference materials known at the time.

Project specific impacts were evaluated based on all relevant facts indicated in the Environmental Assessment Form and expressed through the Applicant's project description and supportive materials. Both the Initial Study Checklist and Checklist Explanations, in conjunction with the City of Los Angeles's Adopted Thresholds Guide and CEQA Guidelines, were used to reach reasonable conclusions on environmental impacts as mandated under the California Environmental Quality Act (CEQA).

The Project as identified in the project description may cause potentially significant impacts on the environment. Therefore, this environmental analysis concludes that an Environmental Impact Report shall be prepared to address all potential adverse impacts on the environment.

ADDITIONAL INFORMATION:

All supporting documents and references are contained in the Environmental Case File referenced above and may be viewed in the Major Projects & EIR Section, Room 750, City Hall.

For City information, addresses, and phone numbers: visit the City's website at <http://www.lacity.org>; City Planning- and Zoning Information Mapping Automated System (ZIMAS) cityplanning.lacity.org/ or Major Projects & EIR Section, City Hall, 200 N Spring Street, Room 750. Seismic Hazard Maps – <http://gmw.consrv.ca.gov/shmp/> Engineering/Infrastructure/Topographic Maps/Parcel Information – <http://boemaps.eng.ci.la.ca.us/index0.1htm> or City's main website under the heading "Navigate LA."

PREPARED BY: Erin Strelch	TITLE: Planning Assistant	TELEPHONE NO.: (213) 978-1351	DATE: July 16, 2014
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IV. ENVIRONMENTAL IMPACT ANALYSIS

INTRODUCTION

This section of the Initial Study contains an assessment and discussion of impacts associated with each environmental issue and subject area identified in the Initial Study Checklist. The thresholds of significance are based on the practices of the City of Los Angeles, the *L.A. CEQA Thresholds Guide 2006*, and other sources as noted.

IMPACT ANALYSIS

1. AESTHETICS

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

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks views of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest). Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether a project results in a significant impact on a scenic vista shall be made considering the following factors:

- The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or ocean);
- Whether a project affects views from a designated scenic highway, corridor, or parkway;
- The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and
- The extent to which a project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact would occur only if scenic resources would be damaged and/or removed by development of a project.

This potential impact shall be evaluated in an EIR.

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur if the project introduced incompatible visual elements on the project site or visual elements that would be incompatible with the character of the area surrounding the project site.

General Character Significance Methodology

Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether the project results in a significant aesthetic impact shall be made considering the following factors:

- The amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area, which would be removed, altered or demolished;
- The amount of natural open space to be graded or developed;
- The degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc.
- The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image;
- The degree to which the project would contribute to the area's aesthetic value; and
- Applicable guidelines and regulations.

This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur if the project introduces new sources of light or glare on or from the project site which would be incompatible with the areas surrounding the project site, or which pose a safety hazard to motorists utilizing adjacent streets. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether the project results in a significant nighttime illumination impact shall be made considering the following factors:

- The change in ambient illumination levels as a result of project sources; and

- The extent to which project lighting would spill off the project site and effect adjacent light-sensitive areas.

This potential impact shall be evaluated in an EIR.

Shade and Shadow Thresholds of Significance

Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project shading impact would normally be considered significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time between the first Sunday in November and the second Sunday in March, or for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time between the second Sunday in March and the first Sunday in November.

This potential impact shall be evaluated in an EIR.

Cumulative Impacts

This potential impact shall be evaluated in an EIR.

2. AGRICULTURE AND FORESTRY RESOURCES

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

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if the project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use.

The Project Site is fully developed with the existing 861,162 square foot REEF building, surface parking lots, and an 11,150 square foot warehouse building and is located in a heavily urbanized area of the City of Los Angeles. No farmland or agricultural activity exists on or in the vicinity of the Project Site. According to the Soil Candidate Listing for Prime Farmland of Statewide Importance, Los Angeles County, which was prepared by the U.S. Department of Agriculture Natural Resources Conservation Service (NRCS), the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. In addition, the Project Site has not been mapped

pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.¹ Therefore, no impact would occur.

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

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if the project were to result in the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use.

The Project Site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the Los Angeles Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code). The Zoning Code includes development standards for the various districts in the City of Los Angeles. The Project Site is currently zoned M1-2-O and [Q]M1-2-O and has a land use designation of Limited Manufacturing in the Southeast Los Angeles Community Plan. The Project Site is not zoned for agricultural production, and there is no farmland at the Project Site. In addition, no Williamson Act Contracts are in effect for the Project Site.² Therefore, no impact would occur.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12222(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project were to result in the conversion of land zoned for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).

The Project Site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the LAMC, particularly Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code). The Zoning Code includes development standards for the various districts in the City of Los Angeles. The Project Site is currently zoned M1-2-O and [Q]M1-2-O and has a land use designation of Limited Manufacturing in the Southeast Los Angeles

¹ Source: State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2006, Map, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2006/los06.pdf>, access April 30, 2014.

² Williamson Act Program, California Division of Land Resource Protection, website: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/statewide/2006/fmmp2006_wallsize.pdf, accessed April 30, 2014.

Community Plan. The Project Site is not zoned as forest land or timberland, and there is no Timberland Production at the Project Site. Therefore, no impact would occur.

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

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project were to result in the loss of forest land or conversion of forest land to non-forest use.

The Project Site is fully developed with the existing 861,162 square foot REEF building, surface parking lots, and an 11,150 square foot warehouse building, and is located in a heavily urbanized area of the City of Los Angeles. No forest land exists on or in the vicinity of the Project Site. Therefore, no impact would occur.

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

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project results in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use.

The Project Site is fully developed with the existing 861,162 square foot REEF building, surface parking lots, and an 11,150 square foot warehouse building, and is located in a heavily urbanized area of the City of Los Angeles. Neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses and, as discussed above (Section 2(a)), the Project Site is not classified in any "Farmland" category designated by the State of California. According to the City General Plan Conservation Element Exhibit B, the Project Site is not located near or in any significant farmland area (i.e., a significant commercial crop or animal producing site). Therefore, no impact would occur.

Cumulative Impacts

No Impact. Development of the Project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use nor result in the loss of forest land or conversion of forest land to non-forest use. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category.³ The Project Site and

³ State of California Department of Conservation, Division of Land Resource Protection, *Farmland Mapping and Monitoring Program*, ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/statewide/2006/fmmp2006_wallsize.pdf, accessed April 30, 2014.

the related projects are located in an urbanized area in the City and do not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact would occur.

3. AIR QUALITY

a) Would the project conflict with or obstruct implementation of the SCAQMD or congestion management plan?

Potentially Significant Impact. A significant impact may occur if the project is not consistent with the applicable air quality plan or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. In the case of projects proposed within the City of Los Angeles or elsewhere in the South Coast Air Basin (Basin), the applicable plan is the Air Quality Management Plan (AQMP) that is prepared by the South Coast Air Management District (SCAQMD).

This potential impact shall be evaluated in an EIR.

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Potentially Significant Impact. A project may have a significant impact where project-related emissions would exceed federal, state or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. The City of Los Angeles utilizes the following thresholds for the environmental review of plans and development proposals within its jurisdiction.

Construction Period Emissions – Daily Mass Emissions of CO, VOC, NOx, SOx, and PM₁₀

The SCAQMD currently recommends that projects with construction-related emissions that exceed any of the following emissions thresholds should be considered significant:

- 550 pounds per day of carbon monoxide (CO)
- 75 pounds per day of volatile organic compounds (VOC)
- 100 pounds per day of nitrogen oxides (NOx)
- 150 pounds per day of sulfur oxides (SOx)
- 150 pounds per day of respirable particulate matter (PM₁₀)

Operational Emission Thresholds – Daily Mass Emissions of CO, VOC, NOx, SOx, and PM₁₀

The SCAQMD currently recommends that projects with operational emissions that exceed any of the following emissions thresholds should be considered significant:

- 550 pounds per day of CO

- 55 pounds per day of VOC
- 55 pounds per day of NO_x
- 150 pounds per day of SO_x
- 150 pounds per day of PM₁₀

Ambient Air Quality Levels of CO, NO_x, and PM₁₀

The SCAQMD recommends that projects that generate emissions within the project site that cause the state ambient air quality standards for CO and nitrogen dioxide (NO₂) to be exceeded at nearby receptors should be considered significant. Emissions associated with project-generated vehicles that cause localized levels of CO near roadways and intersections to exceed state standards for this pollutant should also be considered significant. Because the Basin is not in attainment of the state ambient air quality standard for PM₁₀, the SCAQMD recommends that projects that generate emissions within the project site that cause a substantial increase in 24-hour PM₁₀ levels at nearby sensitive receptors (receptors where people would be expected to reside for 24 consecutive hours) should be considered significant. The SCAQMD currently defines a substantial increase in local PM₁₀ levels as 10.4 µg/m³ during construction and 2.5 g/m³ during operation of the project.

Toxic Air Contaminants Thresholds

The SCAQMD also recommends that projects that could emit carcinogenic or toxic air contaminants that exceed the maximum individual cancer risk of 10 in one million be considered significant and cumulatively considerable.

These potential impacts shall be evaluated in an EIR.

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

Potentially Significant Impact. A significant impact may occur if a project would add a considerable cumulative contribution to federal or state non-attainment pollutant.

This potential impact shall be evaluated in an EIR.

- d) Would the project expose sensitive receptors to substantial pollutant concentrations?**

Potentially Significant Impact. A significant impact may occur where a project would generate pollutant concentrations to a degree that would significantly affect sensitive receptors. The SCAQMD currently recommends that impacts to sensitive receptors be considered significant when emissions generated at a project site causes localized CO and NO₂ levels to exceed state ambient air quality standards at

sensitive receptors or where a project causes an increase in local PM_{10} levels of $10.4 \mu\text{g}/\text{m}^3$ during construction and $2.5 \text{ g}/\text{m}^3$ during operation of the project. A significant impact may also occur where a project would cause concentrations at sensitive receptors located near congested intersections to exceed the national or state ambient air quality standards and the traffic generated by the project contributes at least 1.0 parts per million (ppm) to the 1-hour concentrations or 0.45 ppm to the 8-hour concentrations.

This potential impact shall be evaluated in an EIR.

e) Would the project create objectionable odors affecting a substantial number of people?

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project-related significant adverse effect could occur if construction or operation of the project would result in generation of odors that would be perceptible in adjacent sensitive areas.

Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. The Project would include commercial and residential uses and would not contain any of the above-listed odor producing uses. Therefore, no impact associated with objectionable odors would occur.

Cumulative Impacts

This potential impact shall be evaluated in an EIR.

4. BIOLOGICAL RESOURCES

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

No Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact on biological resources if it could result in:

- The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern;
- The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or

- Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The Project Site is fully developed with the existing 861,162 square foot REEF building, surface parking lots, and an 11,150 square foot warehouse building and is located in a heavily urbanized area of the City of Los Angeles. There are no protected trees as defined by the City of Los Angeles Protected Tree Ordinance No. 177,404 (i.e., native oaks [*Quercus* sp.], western sycamore [*Platanus racemosa*], Southern California black walnut [*Juglans californica*] and California bay [*Umbellularia californica*]) on the Project Site. The only vegetation on the Project Site consists of approximately 50 non-native trees, in varying health and aesthetic condition. The Project Site does not contain any habitat capable of sustaining any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. In addition, there are no known locally designated natural communities at the Project Site or in the project vicinity. Therefore, the Project would have no impact on sensitive biological species or habitat.

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

No Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact on biological resources if it could result in:

- The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern;
- The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community;
- The alternation of an existing wetland habitat; or
- Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The Project Site is fully developed with the existing 861,162 square foot REEF building, surface parking lots, and an 11,150 square foot warehouse building and is located in a heavily urbanized area of the City of Los Angeles. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site. Implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities.

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

No Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact on biological resources if it could result in:

- The alteration of an existing wetland habitat.

The Project Site is fully developed with the existing 861,162 square foot REEF building, surface parking lots, and an 11,150 square foot warehouse building. Review of the National Wetlands Inventory identified no protected wetlands in the project area.⁴ Therefore, the Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (see Section 4(b), above) and no impacts to riparian or wetland habitats would occur with implementation of the Project.

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

No Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact on biological resources if it could result in:

- Interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species.

As discussed in Section 4(a), the Project Site is located in an area that has been previously developed in a heavily urbanized area of the City of Los Angeles. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the project vicinity. Therefore, the Project would not interfere with the movement of any resident or migratory fish or wildlife species.

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

Potentially Significant Impact. For the purpose of this Initial Study, a project-related significant adverse effect could occur if the project would cause an impact which is inconsistent with local regulations pertaining to biological resources, e.g the City of Los Angeles Protected Tree Ordinance No. 177,404. In addition to the Protected Tree Ordinance, it is the City's policy that all mature trees (at least eight-inches in diameter at breast height) that are removed at development sites as part of project implementation

⁴ National Wetlands Inventory, U.S. Fish & Wildlife Service, website: <http://www.fws.gov/wetlands/Wetlands-Mapper.html>, accessed April 30, 2014.

be replaced at a 1:1 ratio and the removal of any trees in the public right-of-way be approved by the Board of Public Works.

This potential impact shall be evaluated in an EIR.

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

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact would occur if the project would be inconsistent with mapping or policies in any conservation plans of the types cited.

The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, no impact would occur with implementation of the project.

Cumulative Impacts

This potential impact shall be evaluated in an EIR.

5. CULTURAL RESOURCES

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Potentially Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project would disturb historic resources which presently exist within the project site. Section 15064.5 of the State CEQA Guidelines defines an historical resource as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A significant adverse effect would occur if a project were to adversely affect an historical resource meeting one of the above definitions. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

This potential impact shall be evaluated in an EIR.

- b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?**

Potentially Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if grading or excavation activities associated with a project would disturb archaeological resources which presently exist within the Project Site.

This potential impact shall be evaluated in an EIR.

- c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

Potentially Significant Impact. A significant impact could occur if grading or excavation activities associated with a project would disturb paleontological resources or geologic features which presently exist within the Project Site.

This potential impact shall be evaluated in an EIR.

- d) Would the project disturb any human remains, including those interred outside of formal cemeteries?**

Potentially Significant Impact. A significant adverse impact could occur if grading or excavation activities associated with a project were to disturb previously interred human remains.

This potential impact shall be evaluated in an EIR.

Cumulative Impacts

This potential impact shall be evaluated in an EIR.

6. GEOLOGY AND SOILS

- a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**

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

Potentially Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a

significant impact may occur if a Project Site is located within a state-designated Alquist-Priolo Zone or other designated fault zone, and appropriate building practices are not employed.

This potential impact shall be evaluated in an EIR.

(ii) Strong seismic ground shaking?

Potentially Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if a proposed project represents an increased risk to public safety or destruction of property by exposing people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the southern California region.

This potential impact shall be evaluated in an EIR.

(iii) Seismic-related ground failure, including liquefaction?

Potentially Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if the project is located in an area identified as having a high risk of liquefaction and mitigation measures required within such designated areas are not incorporated into the project.

This potential impact shall be evaluated in an EIR.

(iv) Landslides?

No Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding.

According to *City of Los Angeles Department of Planning, Zone Information and Map Access System*⁵, the Site is not located within an area identified as having potential for landslides. In addition, according to the City of Los Angeles General Plan, Safety Element (1996)⁶, the Site is not located within an area identified as having potential for landslides.

The Project Site is in a densely developed area of the City and there are no known landslides near the site, nor is the site in the path of any known or potential landslides. As the probability of landslides, including seismically induced landslides, is considered to be very low at the Project Site, no impact would occur.

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

Potentially Significant Impact. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time.

This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. A significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for proposed buildings, thus posing a hazard to life and property.

This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. A significant impact may occur if the project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus, posing a hazard to life and property.

This potential impact shall be evaluated in an EIR.

⁵ City of Los Angeles Department of Planning, *Zone Information and Map Access System*, 1933 S. Broadway (et al), website: <http://zimas.lacity.org/>, May 1, 2014.

⁶ City of Los Angeles Department of City Planning, *Environmental and Public Facilities Maps: Safety Element Exhibit C: Landslide Inventory and Hillside Areas in the City of Los Angeles*, May 1995, website: <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>, accessed January 8, 2023.

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

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, this question would apply to the project only if it was located in an area not served by an existing sewer system.

The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems are necessary, nor are they proposed. No impact would occur.

Cumulative Impacts

This potential impact shall be evaluated in an EIR.

7. GREENHOUSE GAS EMISSIONS

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

Potentially Significant Impact. Construction and operation (i.e., use of the residences by occupants and mobile emissions associated with such use) of the Project would generate greenhouse gas emissions. Generally, the evaluation of an impact under CEQA requires measuring data from a project against a “threshold of significance.”⁷ Furthermore, “when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.”⁸ For greenhouse gas emissions and global warming, there is not, at this time, one established, universally agreed-upon “threshold of significance” by which to measure an impact.

Section 15064.4 of the revised CEQA Guidelines that became effective on March 18, 2010 states:

- (b) A lead agency should consider the following factors, among others, when assessing the significance of greenhouse gas emissions on the environment:

- (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;

⁷ CEQA Guidelines Section 15064.7.

⁸ CEQA Guidelines Section 15064.7(c).

- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
- (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

According to Appendix G of the *CEQA Guidelines*, as revised on March 18, 2010, a project could have a significant environmental impact if it would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

As such, the Project would have a significant impact with respect to GHG emissions and global climate change if it would substantially conflict with the provisions of Section 15064.4(b) of the State CEQA Guidelines or Appendix G to the CEQA Guidelines as set forth above.

This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. A significant air quality impact may occur if a project is not consistent with the AB 32 Scoping Plan or other applicable plans designed to reduce greenhouse gas emissions such as a Climate Action Plan, or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of such a plan.

This potential impact shall be evaluated in an EIR.

Cumulative Impacts

This potential impact shall be evaluated in an EIR.

8. HAZARDS AND HAZARDOUS MATERIALS

According to the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance with respect to hazards and hazardous materials shall be made on a case-by-case basis considering the following factors:

- The regulatory framework for the health hazard;
- The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance;
- The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance;
- The probable frequency and severity of consequences to people from exposure to the health hazard; and
- The degree to which project design would reduce the frequency of exposure or severity of consequences to exposure to the health hazard.

The following specific checklist questions are evaluated applying the foregoing methodology.

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

Potentially Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact to hazards and hazardous materials if:

- The project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or
- The project involved the creation of any health hazard or potential health hazard.

This potential impact shall be evaluated in an EIR.

b) Would the project create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Potentially Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact to hazards and hazardous materials if:

- A project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or

- A project involved the creation of any health hazard or potential health hazard.

This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact to hazards and hazardous materials if:

- A project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or
- A project involved the creation of any health hazard or potential health hazard.

This potential impact shall be evaluated in an EIR.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Potentially Significant Impact. California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

This potential impact shall be evaluated in an EIR.

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

No Impact. A significant impact may occur if a project is located within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard.

The closest public airports to the Project Site are the Burbank Airport, Santa Monica Airport and the Los Angeles International Airport (LAX). However, none of these airports are located within two miles of the

Project Site. Furthermore, the Project Site is not in an airport hazard area.⁹ Therefore, no impact would occur.

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

No Impact. This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard.

The Project Site is not located in the vicinity of a private airstrip. Therefore, no impact would occur.

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

Potentially Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact to hazards and hazardous materials if:

- A project involved possible interference with an emergency response plan or emergency evacuation plan.

According to the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- The degree to which a project may require a new, or interfere with an existing emergency response or evacuation plan, and the severity of the consequences.

This potential impact shall be evaluated in an EIR.

h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact would occur if the project site is located in proximity to wildland areas and poses a significant fire hazard, which could affect persons or structures in the areas in the event of a fire.

⁹ City of Los Angeles Department of Planning, *Zone Information and Map Access System*, 1933 S. Broadway (et al), website: <http://zimas.lacity.org/>, May 1, 2014.

The Project Site is located in a highly urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Fire High Fire Hazard Severity Zone (VHFHSZ).¹⁰ Therefore, no impacts from wildland fires would occur.

Cumulative Impacts

This potential impact shall be evaluated in an EIR.

9. HYDROLOGY AND WATER QUALITY

a) Would the project violate any water quality standards or waste discharge requirements?

Potentially Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

The Los Angeles Regional Water Quality Control Board (LARWQCB) issued a Municipal Storm Water NPDES Permit (No. CAS004001) in December 2001 that requires new development and redevelopment projects to incorporate storm water mitigation measures. Under the Municipal Storm Water NPDES Permit, redevelopment is defined as any land-disturbing activity that “results in the creation, addition, or replacement of 5,000 sf or more of impervious surface area on an already developed site.”¹¹ Depending on the type of project, either a Standard Urban Stormwater Mitigation Plan (SUSMP) or a Site Specific Mitigation Plan is required to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site. Site Specific Mitigation Plans are required for the following uses:

- Single-Family Hillside Residences over one acre

¹⁰ City of Los Angeles Department of Planning, *Zone Information and Map Access System*, 1933 S. Broadway (et al), website: <http://zimas.lacity.org/>, May 1, 2014.

¹¹ *Development Planning for Storm Water Management: A Manual for the Standard Urban Storm Water Mitigation Plan (SUSMP)*. Los Angeles County Department of Public Works. September 2002 website: http://dpw.lacounty.gov/wmd/npdes/SUSMP_MANUAL.pdf, accessed May 1, 2014.

- Housing developments (including single-family homes, multi-family homes, condominiums, and apartments) of ten or more units
- Industrial/Commercial developments of one acre or more of impervious surface area
- Automotive service facilities (SIC 5013, 5014, 5541, 7532-7534, and 7536-7539)
- Retail gasoline outlets
- Restaurants (SIC 5812)
- Parking lots with 5,000 square feet or more of surface area, including accessory driveways, or with 25 or more parking spaces
- Projects located in, adjacent to, or discharging directly to a designated Environmentally Sensitive Area (ESA)

This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact on groundwater level if it would:

- Change potable water levels sufficiently to:
 - Reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought;
 - Reduce yields of adjacent wells or well fields (public or private); or
 - Adversely change the rate or direction of flow of groundwater; or
- Result in demonstrable and sustained reduction in groundwater recharge capacity.

This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. A significant impact may occur if a project would substantially alter drainage patterns resulting in a significant increase in erosion or siltation during construction or operation of a project.

This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact on surface water hydrology if it would:

- Result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

This potential impact shall be evaluated in an EIR.

- e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

Potentially Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the volume of storm water runoff from the project site were to increase to a level which exceeds the capacity of the storm drain system serving the project site. A project-related significant adverse effect would also occur if the project would substantially increase the probability that polluted runoff would reach the storm drain system.

This potential impact shall be evaluated in an EIR.

- f) Would the project otherwise substantially degrade water quality?**

Potentially Significant Impact. Although not specified in the City of Los Angeles *LA CEQA Thresholds Guide 2006*, a significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality.

This potential impact shall be evaluated in an EIR.

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

No Impact. This question would apply to the project only if it were placing housing in a 100-year flood zone.

The Project Site is not in an area designated as a 100-year flood hazard area.¹² Therefore, the Project would not have risks of flooding. No impact would occur.

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. Although not specified in the City of Los Angeles *LA CEQA Thresholds Guide 2006*, a significant impact may occur if the project was located within a 100-year flood zone, which would impede or redirect flood flows.

As mentioned in Section 8(g), the Project Site is not in an area designated as a 100-year flood hazard area.¹³ The Project Site is located in a highly urbanized area and would not have the potential to impede or redirect floodwater flows. No impact would occur.

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

Potentially Significant Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam, including but not limited to a seismically-induced seiche, which is a surface wave created when a body of water is shaken, which could result in a water storage facility failure.

This potential impact shall be evaluated in an EIR.

j) Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami), or if

¹² City of Los Angeles Department of Planning, *Zone Information and Map Access System*, 1933 S. Broadway (et al), website: <http://zimas.lacity.org/>, May 1, 2014.

¹³ City of Los Angeles Department of Planning, *Zone Information and Map Access System*, 1933 S. Broadway (et al), website: <http://zimas.lacity.org/>, May 1, 2014.

the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows.

The Project Site is located at least 14 miles from the Pacific Ocean and is not in the vicinity of any other major water bodies; therefore, risks associated with seiches or tsunamis would be considered extremely low at the Project Site. Furthermore, the Project Site is located in the highly urbanized Southeast Los Angeles community of the City, where little open space exists. Therefore, the potential for mudflows to impact the Project Site would also be highly unlikely. As such, there would be no impacts related to risk of loss, injury, or death by seiche, tsunami, or mudflow.

Cumulative Impacts

This potential impact shall be evaluated in an EIR.

10. LAND USE AND PLANNING

a) Would the project physically divide an established community?

Potentially Significant Impact. A significant impact may occur if the project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. According to the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance shall be made on a case-by-case basis considering the following factors:

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

This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. A significant impact may occur if the project is inconsistent with the General Plan or zoning designations currently applicable to the project site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate.

According to the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site;
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans;

This potential impact shall be evaluated in an EIR.

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

No Impact. Although not specified in the City of Los Angeles *LA CEQA Thresholds Guide 2006*, a project-related significant adverse effect could occur if the project site were located within an area governed by a habitat conservation plan or natural community conservation plan.

As discussed in Section 4(f) above, no such plans presently exist which govern any portion of the Project Site. Further, the Project Site is located in an area which has been previously developed with commercial uses, and is also within a heavily urbanized area of Los Angeles. Therefore, the Project would not have the potential to cause such effects.

Cumulative Impacts

This potential impact shall be evaluated in an EIR.

11. MINERAL RESOURCES

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Less Than Significant Impact. Although not specified in the City of Los Angeles *LA CEQA Thresholds Guide 2006*, a significant impact may occur if the project site is located in an area used or available for extraction of a regionally-important mineral resource, or if the project development would convert an existing or future regionally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. According to the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone MRZ-2 zone or other known or potential mineral resource area, and

- Whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

The Project Site is fully developed and no oil wells are present on the Project Site. According to the Los Angeles City General Plan Safety Element Exhibit E, Oil Field and Oil Drilling Areas, the Project Site is located within the State-designated boundary of the Las Cienegas Oil Field and is near the State-Designated boundary of the Los Angeles Downtown Oil Field. The Project Site is designated in the LAMC as located in an Oil Drilling District O, which allows for the use of a controlled drill site. The nearest well to the Project Site is the Garey Community Well located approximately 1,300 feet southeast of the Project Site. The well was drilled in 1963 and was subsequently abandoned and plugged. As the Project Site would be entirely developed with urban uses, the Project would not affect on-going extraction activities and impacts on existing or future regionally-important mineral extraction sites would be less than significant. According to the City General Plan Conservation Element Exhibit A, the Project Site is not located in a mineral resources zone, but is located near an MRZ-2 zone. The Project would not involve mineral extraction activities, nor are any such activities presently occurring on or in the vicinity of the Project Site. Therefore, a less than significant impact would occur with implementation of the Project.

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

No Impact. Although not specified in the City of Los Angeles *LA CEQA Thresholds Guide 2006*, a significant impact may occur if the project site is located in an area used or available for extraction of a locally-important mineral resource, or if the project development would convert an existing or future locally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for locally-important mineral resource extraction. According to the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a MRZ-2 zone or other known or potential mineral resource area, and
- Whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

There are no oil extraction operations and drilling or mining of mineral resources at the Project Site. Therefore, development of the Project would not result in the loss of availability of a mineral resource that would be of value to the residents of the state or a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. Therefore, no impact associated with mineral resources would occur.

Cumulative Impacts

No Impact. As discussed above, the Project would not have significant impacts on mineral resources. It is not known if any related projects would result in the loss of availability of known mineral resources. Regardless, because the Project would have no incremental contribution to the potential cumulative impact on mineral resources, the Project would have no cumulative impact on such resources.

12. NOISE

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

Potentially Significant Impact. Although not specified in the City of Los Angeles *LA CEQA Thresholds Guide 2006*, a significant impact may occur where a project would not comply with the City of Los Angeles General Plan Land Use Compatibility Standards for Noise or the City of Los Angeles Noise Ordinance (Municipal Code Ordinance No. 144,331).

This potential impact shall be evaluated in an EIR.

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. The ground motion caused by vibration is measured as particle velocity in inches per second and in the U.S. is referenced as vibration decibels (VdB).

The City of Los Angeles has not adopted any thresholds for groundborne vibration impacts. Therefore, this analysis uses the Federal Railway Administration's vibration impact thresholds for sensitive buildings. These thresholds are 80 VdB at residences and buildings where people normally sleep (e.g., nearby residences). No thresholds have been adopted or recommended for commercial and light industrial uses.

This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. A significant impact may occur if the project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the project. Based upon the criteria established in the City of Los Angeles' *Draft L.A. CEQA Thresholds Guide*, a project would typically have a significant impact on noise levels from project operations if the project

would increase the ambient noise levels by 3 dBA CNEL at the property line of homes where the resulting noise level would be at least 70 dBA CNEL or at the property line of commercial buildings where the resulting noise level is at least 75 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact.

This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. A significant impact may occur if the project were to result in a substantial temporary or periodic increase in ambient noise levels above existing ambient noise levels without the project. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact noise levels from construction if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA [CNEL] or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA [CNEL] or more at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5dBA [CNEL] at a noise sensitive use between the hours of 9:00 PM and 7:00 AM Monday through Friday, before 8:00 AM or after 6:00 PM on Saturday, or at any time on Sunday.

This potential impact shall be evaluated in an EIR.

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

No Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact on ambient noise levels would normally occur if noise levels at a noise sensitive use attributable to airport operations exceed 65 dBA CNEL and the project increases ambient noise levels by 1.5 dBA CNEL or greater.

The closest public airports to the Project Site are the Burbank Airport, Santa Monica Airport, and the Los Angeles International Airport (LAX). However, the Project Site is not located within two miles of a public

airport and furthermore, the Project Site is not in an airport land use plan area.¹⁴ Therefore, no impact would occur.

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

No Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact on ambient noise levels would normally occur if noise levels at a noise sensitive use attributable to airport operations exceed 65 dBA CNEL and the project increases ambient noise levels by 1.5 dBA CNEL or greater. This question would apply to a project only if the project site were in the vicinity of a private airstrip and would subject area residents and workers to substantial noise levels from aircraft operations.

The Project Site is not located in the vicinity of a private airstrip. No such facilities are located in the vicinity of the Project Site, and as such, no impact would occur.

Cumulative Impacts

This potential impact shall be evaluated in an EIR.

13. POPULATION AND HOUSING

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

Potentially Significant Impact. A significant impact may occur if a project were to locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing population growth that would otherwise not have occurred as rapidly or in as great a magnitude.

This potential impact shall be evaluated in an EIR.

b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if a project would result in the displacement of existing housing, necessitating construction of replacement housing elsewhere. The Project Site is currently occupied by the existing 861,162 square foot REEF building, surface parking lots, and an 11,150 square foot warehouse building. The Project Site does not contain any existing housing; therefore,

¹⁴ City of Los Angeles Department of Planning, *Zone Information and Map Access System*, 1933 S. Broadway (et al), website: <http://zimas.lacity.org/>, May 1, 2014.

development of the Project would not displace any existing housing and would not require construction of replacement housing. No impact would occur. No mitigation measures are required and no further analysis of this issue in an environmental impact report is necessary.

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if a project would result in the displacement of existing residents, necessitating the construction of replacement housing elsewhere. Based on the existing on-site uses, no people currently reside on the Project Site. Therefore, no people would be displaced by the Project and no impact would occur. No mitigation measures are required and no further analysis of this issue in an environmental impact report is necessary.

Cumulative Impacts

This potential impact shall be evaluated in an EIR.

14. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective for any of the following public services:

(i) Fire protection?

Potentially Significant Impact. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to Section 57.09.07A of the LAMC, the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles; while for a commercial land use, the distance is one mile for an engine company and 1.5 miles for a truck company. If either of these distances is exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems.

This potential impact shall be evaluated in an EIR.

Cumulative Impacts

This potential impact shall be evaluated in an EIR.

(ii) Police protection?

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether the project results in a significant impact on police protection shall be made considering the following factors:

- The population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area;
- The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and
- Whether the project includes security and/or design features that would reduce the demand for police services.

This potential impact shall be evaluated in an EIR.

Cumulative Impacts

This potential impact shall be evaluated in an EIR.

(iii) Schools?

Potentially Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the schools serving the project site. The Project is in an area that is currently served by several Los Angeles Unified School District (LAUSD) public schools, as well as several private schools and after-school programs.

This potential impact shall be evaluated in an EIR.

Cumulative Impacts

This potential impact shall be evaluated in an EIR.

(iv) Parks?

Potentially Significant Impact. A significant impact to parks may occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts.

This potential impact shall be evaluated in an EIR.

Cumulative Impacts

This potential impact shall be evaluated in an EIR.

(v) Other public facilities (including roads)?

Potentially Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the project site, necessitating a new or physically altered library, the construction of which would have significant physical impacts on the environment.

This potential impact shall be evaluated in an EIR.

Cumulative Impacts

This potential impact shall be evaluated in an EIR.

15. RECREATION

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

Potentially Significant Impact. A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for park or recreational facilities that would exceed the capacity of existing parks and causes premature deterioration of the park facilities.

This potential impact shall be evaluated in an EIR.

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

No Impact. A significant impact may occur if a project includes the construction or expansion of park facilities, the construction of which would have a significant adverse effect on the environment.

The Project does not include nor would it necessitate a park or recreational facility component, the construction of which could have an adverse environmental impact. Therefore, no impact would occur with respect to the construction or expansion of recreational facilities. No mitigation measures would be required and no further analysis of this issue in an environmental impact report is necessary.

Cumulative Impacts

This potential impact shall be evaluated in an EIR.

16. TRANSPORTATION AND TRAFFIC

- a) **Would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number or vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?**

Potentially Significant Impact. A significant impact would occur if the change in traffic volumes at the study-area intersections associated with project equals or exceeds the thresholds of significance adopted by the City of Los Angeles. These thresholds are based on the Critical Movement Analysis (CMA) method and Levels of Service (LOS). The CMA procedure uses a ratio of the traffic volume to the intersection capacity to define the proportion of an hour necessary to accommodate all the traffic moving through the intersection. The CMA procedure adds the highest combination of conflicting traffic volume (V) at an intersection and divides the sum by the intersection capacity value for a V/C ratio. Intersection capacity (C) represents the maximum volume of vehicles which has a reasonable expectation of passing through an intersection in one hour under typical traffic flow conditions. V/C ratios provide an ideal means for quantifying intersection operating characteristics for planning purposes. For example, if an intersection has a V/C value of 0.70, the intersection is operating at 70% capacity with 30% unused capacity.

Once the volume-to-capacity ratio is calculated, operating characteristics are assigned a level of service grade (A through F) to estimate the level of congestion and stability of the traffic flow. The term "Level of Service" (LOS) is used by traffic engineers to estimate the level of congestion generally accepted by drivers and grade the stability of traffic flow. Definitions of the LOS grades are shown in Table IV-1.

**Table IV-1
V/C Level of Service Definitions**

Level of Service	Definition	Equivalent V/C
A	<u>EXCELLENT</u> - Free flow conditions with low traffic density.	0.00 - 0.60
B	<u>VERY GOOD</u> - A stable flow of traffic.	0.61 - 0.70
C	<u>GOOD</u> - Light congestion but stable, occasional backups behind left-turning vehicles.	0.71 - 0.80
D	<u>FAIR</u> - Approaching instability, drivers are restricted in freely changing lanes. Vehicles may be required to wait through more than one cycle.	0.81 - 0.90
E	<u>POOR</u> - At or near capacity with some long lines for left-turning vehicles. Blockage of intersection may occur if traffic signal does not provide for protected turning movements.	0.91 - 1.00
F	<u>FAILURE</u> - Jammed conditions with stoppages of long duration and long queues.	>1.00

Source: Highway Capacity Manual, Special Report 209, Transportation Research Board, 2000.

According to the standards adopted by the City of Los Angeles, a traffic impact is considered significant if the related increase in the V/C value equals or exceeds the thresholds as provided below in Table IV-2:

**Table IV-2
Significant Project Traffic Impact**

LOS	Final V/C Ratio	Project-Related Increase in V/C
C	>0.700 – 0.800	Equal to or greater than 0.040
D	>0.800 – 0.900	Equal to or greater than 0.020
E, F	>0.900	Equal to or greater than 0.010

This potential impact shall be evaluated in an EIR.

b) Would the project exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?

Potentially Significant Impact. A significant impact may occur if the project would cause a substantial change in freeway conditions or Congestion Management Program (CMP)-designated surface streets when compared to conditions without the project.

This potential impact shall be evaluated in an EIR.

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

No impact. This question would apply to the project only if it involved an aviation-related use or would influence changes to existing flight paths.

The Project does not include any aviation-related uses and would have no airport impact. It would also not require any modification of flight paths for the existing airports in the Los Angeles Basin. Therefore, no impact would occur.

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

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a project included new roadway design or introduced a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions.

This potential impact shall be evaluated in an EIR.

e) Would the project result in inadequate emergency access?

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur if the project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the project site or adjacent uses.

This potential impact shall be evaluated in an EIR.

f) Would the project conflict with adopted polices, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur if the project would conflict with adopted polices or involve modification of existing alternative transportation facilities located on- or off-site.

This potential impact shall be evaluated in an EIR.

Cumulative Impacts

This potential impact shall be evaluated in an EIR.

17. UTILITIES AND SERVICE SYSTEMS

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a project would discharge wastewater, whose content exceeds the regulatory limits established by the governing agency.

This question would typically apply to properties served by private sewage disposal systems, such as septic tanks. Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge (ROWD) containing information which may be required by the appropriate Regional Water Quality Control Board (RWQCB). The RWQCB then authorizes a National Pollutant Discharge Elimination System (NPDES) permit that ensures compliance with wastewater treatment and discharge requirements.

This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether the project results in a significant impact on water shall be made considering the following factors:

- The total estimated water demand for the project;
- Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout;
- The amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and
- The degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant wastewater impact if:

- The project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or
- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General plan and its elements.

This potential impact shall be evaluated in an EIR.

c) Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, resulting in the construction of new stormwater drainage facilities.

This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether the project results in a significant impact on water shall be made considering the following factors:

- The total estimated water demand for the project;
- Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout;
- The amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and
- The degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant wastewater impact if:

- The project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or
- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General plan and its elements.

This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether the project results in a significant impact on solid waste shall be made considering the following factors:

- Amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates;
- Need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and
- Whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the Solid Waste Management Policy Plan (CiSWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

This potential impact shall be evaluated in an EIR.

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Potentially Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations.

This potential impact shall be evaluated in an EIR.

Cumulative Impacts

This potential impact shall be evaluated in an EIR.

18. MANDATORY FINDINGS OF SIGNIFICANCE

- a) **Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur only if a project would have an identified potentially significant impact for any of the above issues, as discussed in the preceding sections.

This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur if the project, in conjunction with other related projects in the area of the project site, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together.

This potential impact shall be evaluated in an EIR.

- c) **Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?**

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur if the project has the potential to result in significant impacts, as discussed in the preceding sections.

This potential impact shall be evaluated in an EIR.

V. PREPARERS OF THE INITIAL STUDY

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VI. ACRONYMS & ABBREVIATIONS

AB	Assembly Bill
ARB	California Air Resources Board
ASTM	American Society for Testing Materials
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
APN	Assessor Parcel Number
bgs	Below ground surface
BID	Business Improvement District
BMPs	Best Management Practices
CAPCOA	California Air Pollution Control Officer's Association
CALGreen	California Green Building Standards
Caltrans	California Department of Transportation
CAT	Climate Action Team
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH ₄	Methane
CMP	Congestion Management Program
CO ₂	Carbon Dioxide
CORTESE	California Hazardous Waste and Substances
cy	Cubic yards
dba	A-weighted decibel
du	Dwelling unit
EPA	Environmental Protection Agency (see also USEPA)
ESA	Environmental Site Assessment
FAR	Floor Area Ratio
gpd	Gallons per day

GFA	Gross floor area
GHG	Greenhouse gas
gpm	Gallons per minute
HFC	Hydrofluorocarbons
H ₂ O	Water Vapor
HTP	Hyperion Treatment Plant
IS	Initial Study
LADRP	City of Los Angeles Department of Recreation and Parks
LAFD	City of Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	City of Los Angeles Police Department
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LAX	Los Angeles International Airport
lbs	Pounds
LOS	Level of Service
LST	Localized Significance Threshold
LUST	Leaking Underground Storage Tank
mgd	Million gallons per day
MRZ-2	Mineral Resource Zone 2
MTA	Los Angeles County Metropolitan Transit Authority
NAHC	Native American Heritage Commission
N ₂ O	Nitrous Oxide
NPDES	National Pollution Discharge Elimination System
PFC	Perfluorocarbon
PSI	Pounds per square inch
RCPG	Regional Comprehensive Plan and Guide
RCRA	Resource Compensation and Recovery Act

RD	Reporting District
ROWD	Report of Waste Discharge
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
sf	Square foot
SF ₆	Sulfur Hexafluoride
SOPA	Society of Professional Archaeologists
SRA	Source Receptor Area
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	Stormwater Pollution Prevention Plan
T-FAR	Transfer of Floor Area
USEPA	United States Environmental Protection Agency (see also EPA)
USFWS	U.S. Fish and Wildlife Service
UST	Underground Storage Tank
V/C	Volume/capacity
VOC	Volatile Organic Compound