Appendices

Appendix A

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

Appendix A.1

Initial Study

City of Los Angeles

Department of City Planning • Environmental Analysis Section

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

INITIAL STUDY

CENTRAL CITY COMMUNITY PLAN AREA

222 West 2nd Project

Case Number: ENV-2016-3809-EIR

Project Location: 213 South Spring Street, 200–210 South Broadway, and 232–238 West 2nd Street, Los Angeles, California, 90012-3709

Council District: 14—José Huizar

Project Description: CA-LATS South, LLC (Applicant) proposes the 222 West 2nd Project (Project), which involves the development of a 30-story mixed-use building consisting of 107 residential units (137,347 square feet), approximately 7,200 square feet of ground level commercial floor uses, and 534,044 square feet of office uses in Downtown Los Angeles. The 2.71-acre Project Site, which is bounded by South Broadway on the west, West 2nd Street on the north, and South Spring Street on the east, also is the future site of the Los Angeles County Metropolitan Transportation Authority (Metro) Regional Connector 2nd Street/Broadway rail station. The 2nd Street/Broadway rail station will be below grade, with a station portal at the northwest corner of the site at 2nd Street and Broadway. The Metro station and portal are currently under construction. Overall, the Project's improvements (plus the Metro portal) would comprise a total of 688,401 square feet of floor area and would replace an existing surface parking lot on the northern portion of the Project Site. An existing five-story parking structure is located on the southern portion of the Project Site and would provide automobile and long-term bicycle parking for the Project. The Project also includes a plaza surrounding the Metro portal, which would be integrated with a landscaped paseo located between the new building and the existing parking structure to the south. In addition, amenity decks offering a variety of social and community spaces would be provided on various levels of the new building and would include landscaped terraces, rooftop gardens, and gathering spaces. Indoor and outdoor recreational spaces as well as private balconies also would be provided.

APPLICANT:	**PREPARED BY:**	**ON BEHALF OF:**
CA-LATS South, LLC	Eyestone Environmental	The City of Los Angeles Department of City Planning Major Projects Section

January 2017

Table of Contents

List of Figures

List of Tables

CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 615, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY AND CHECKLIST

(Article IV B City CEQA Guidelines)

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
City of Los Angeles Department of City Planning	14	January 25, 2017

RESPONSIBLE AGENCIES

South Coast Air Quality Management District, Los Angeles Regional Water Quality Control Board, CRA/LA

PROJECT TITLE/NO.	CASE NO.
222 West 2nd Project	ENV-2016-3809-EIR

PREVIOUS ACTIONS CASE NO.	
N/A	☐ DOES have significant changes from previous actions. ☒ DOES NOT have significant changes from previous actions.

PROJECT DESCRIPTION:

CA-LATS South, LLC (Applicant) proposes the 222 West 2nd Project (Project), which involves the development of a 30-story mixed-use building consisting of 107 residential units (137,347 square feet), approximately 7,200 square feet of ground level commercial floor uses, and 534,044 square feet of office uses in Downtown Los Angeles. The 2.71-acre Project Site, which is bounded by South Broadway on the west, West 2nd Street on the north, and South Spring Street on the east, also is the future site of the Los Angeles County Metropolitan Transportation Authority (Metro) Regional Connector 2nd Street/Broadway rail station. The 2nd Street/Broadway rail station will be below grade, with a station portal at the northwest corner of the site at 2nd Street and Broadway.[1] The Metro station and portal are currently under construction. Overall, the Project's improvements (plus the Metro portal) would comprise a total of 688,401 square feet of floor area and would replace an existing surface parking lot on the northern portion of the Project Site. An existing five-story parking structure is located on the southern portion of the Project Site and would provide automobile and long-term bicycle parking for the Project.

The Project Site is located entirely within the Central City Community Plan area, with a land use designation of Regional Center Commercial. The site is zoned [Q]C2-4D-CDO-SN (Commercial, Height District 4 with D limitation, Broadway Theater and Entertainment District Community Design Overlay, Historic Broadway Sign Supplemental Use District). Height District 4 with a D limitation allows a floor area ratio (FAR) of 6.0:1. The site is also subject to [Q] conditions, which were established by Ordinance No. 180,871 in 2009 as part of the adoption of the Broadway Theater and Entertainment District Design Guide. Based on a total of 688,401 square feet of floor area (including the Metro portal), the Project would have an FAR of 5.83:1, in conformance with the Project Site's [Q]C4-2D-CDO-SN zoning classification.

The requested Project approvals include the following: Vesting Zone Change to amend Ordinance No. 180,871 to eliminate or modify [Q] Condition No. 7 (regarding 30 percent minimum and 40 percent maximum lot coverage for the portion of buildings over 150 feet in height) to reflect the Project's proposed design (per LAMC Sections 12.32 G and 12.32 Q); Site Plan Review for a project with an increase of 50,000 square feet of non-residential floor area and 50 or more dwelling units (per LAMC Section 16.05); Design Overlay Plan Approval for a project in the Broadway CDO Zone (per LAMC Section 13.08 E); Vesting Tentative Tract Map No. 74320 for a 10-lot airspace subdivision for merger, resubdivision, and condominium purposes, with a request for haul route approval (per LAMC Section 17.01 and 17.15); Building Line Removal of 120 feet along the east side of Broadway, established by Ordinance No. 75,667 on October 16, 1935 (per LAMC Section 12.32 R); and other discretionary and ministerial permits and approvals that

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1 For ease of reference, the roadways in the Project vicinity may be referred to herein without a directional indicator (e.g., Broadway, 2nd Street, and Spring Street). Furthermore, directional references have been simplified (i.e., Broadway actually borders the Project Site to the northwest but is described herein as the west).

may be deemed necessary, including but not limited to temporary street closure permits, grading permits, excavation permits, foundation permits, and building permits.

Please refer to Attachment A for a more detailed description of the Project.

ENVIRONMENTAL SETTING:

The Project Site is located in a highly urbanized area in Downtown Los Angeles. The Project Site is surrounded by a mix of commercial office, government and civic office, retail, and residential uses contained in a range of low-rise to high-rise buildings, which are physically separated from the Project Site by modified Avenues (as defined in the City's General Plan Mobility Plan 2035). Immediately to the west is an existing surface parking lot and 10-story office building fronting Broadway. To the immediate north across 2nd Street is Los Angeles Times Square, which includes an 11-story office building and a six-level parking structure fronting 2nd Street. East of the Project Site across Spring Street are single-story commercial buildings and a six-level parking structure. To the south is a surface parking lot and six-story apartment building (Hosfield Building) fronting Broadway, as well as a surface parking lot and five-story apartment building (Douglas Building Lofts) fronting Spring Street.

The Project Site lies at the northern end of the Broadway Theater and Entertainment District Community Design Overlay (CDO) area, where development is encouraged to reflect the overall vision of a cohesive, pedestrian-friendly, and vibrant entertainment, commercial, and mixed-use district. The immediate area is defined by several iconic buildings, both old and new. In addition, the Project Site is subject to or located within the following: Greater Downtown Housing Incentive Area; Broadway Streetscape Plan; Transit Priority Area (TPA); City Center Redevelopment Project Area; Los Angeles State Enterprise Zone; Adaptive Reuse Incentive Area; and a Metro Rail Project Area based on construction of the Metro Regional Connector portal and station within the site.

Please refer to Attachment A for a more detailed description of the existing setting.

PROJECT LOCATION

213 South Spring Street, 200–210 South Broadway, and 232–238 West 2nd Street

PLANNING DISTRICT		**STATUS:**
Central City Community Plan Area		☐ **PRELIMINARY** ☐ **PROPOSED** _____ _____ ☒ **ADOPTED** (1988)
EXISTING ZONING	**MAX. DENSITY ZONING**	☒ **DOES CONFORM TO PLAN**
[Q]C2-4D-CDO-SN	Please refer to Attachment A	
PLANNED LAND USE & ZONE	**MAX. DENSITY PLAN**	☐ **DOES NOT CONFORM TO PLAN**
Mixed-Use; [Q]C2-4D-CDO-SN	Please refer to Attachment A	
SURROUNDING LAND USES	**PROJECT DENSITY**	☐ **NO DISTRICT PLAN**
Office, Retail, Residential	Please refer to Attachment A	

☞ ☐ **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.

	PLANNING ASSISTANT
SIGNATURE	TITLE

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

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

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated

or refined from the earlier document and the extent to which they address site-specific conditions for the project.

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

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

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

9) The explanation of each issue should identify:
   a. The significance criteria or threshold, if any, used to evaluate each question; and
   b. The mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

☞ ☐ **BACKGROUND**

PROPONENT NAME	**PHONE NUMBER**
CA-LATS South, LLC (Attn: Murray McQueen)	(424) 278-6455
PROPONENT ADDRESS	
202 W. 1st Street, Suite 4-420, Los Angeles, CA 90012	
AGENCY REQUIRING CHECKLIST	**DATE SUBMITTED**
City of Los Angeles Department of City Planning	January 25, 2017
PROPOSAL NAME (If Applicable)	
222 West 2nd Project	

☞ ☐ **ENVIRONMENTAL IMPACTS** (Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
II. AGRICULTURE AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☒	☐	☐	☐
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☒	☐	☐	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
e. Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
IV. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒
V. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☒	☐	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☒	☐	☐	☐
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐
d. Disturb any human remains, including those interred outside of dedicated cemeteries (see Public Resources Code, Ch. 1.75, §5097.98, and Health and Safety Code §7050.5(b))?	☐	☐	☒	☐
VI. GEOLOGY AND SOILS. Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit 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?	☐	☒	☐	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☒	☐	☐	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☒	☐	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☒	☐	☐	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒
IX. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	☐	☐	☒	☐
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f. Otherwise substantially degrade water quality?	☐	☐	☒	☐
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j. Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
X. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	☐	☐	☒	☐
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒
XI. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
XII. NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
XIII. POPULATION AND HOUSING. Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☒	☐	☐	☐
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	☒	☐	☐	☐
b. Police protection?	☒	☐	☐	☐

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRIBAL CULTURAL RESOURCES.				
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☒	☐	☐	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐
XVIII. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☒	☐	☐	☐
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☒	☐	☐	☐
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☒	☐	☐	☐
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☒	☐	☐	☐
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☒	☐	☐	☐
g. Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐
h. Other utilities and service systems?	☒	☐	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	☒	☐	☐	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

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

PREPARED BY	TITLE	TELEPHONE #	DATE
Stephanie Eyestone-Jones Eyestone Environmental 6701 Center Drive West, Suite 900 Los Angeles, CA 90045	President	(424) 207-5333	January 25, 2017

A. Project Description

Attachment A: Project Description

1. Introduction

CA-LATS South, LLC (Applicant) proposes the 222 West 2nd Project (Project), which involves the development of a 30-story mixed-use building consisting of 107 residential units (137,347 square feet), approximately 7,200 square feet of ground level commercial uses, and 534,044 square feet of office uses in Downtown Los Angeles. The 2.71-acre Project Site, which is bounded by South Broadway on the west, West 2nd Street on the north, and South Spring Street on the east, also is the future site of the Los Angeles County Metropolitan Transportation Authority (Metro) Regional Connector 2nd Street/Broadway rail station and portal.[1] The 2nd Street/Broadway rail station will be below grade, with a station portal at the northwest corner of the site at 2nd Street and Broadway.[2] The Metro station and portal are currently under construction. Overall, the Project's improvements (plus the Metro portal) would comprise a total of 688,401 square feet of floor area and would replace an existing surface parking lot located on the northern portion of the Project Site. An existing five-story parking structure is located on the southern portion of the Project Site and would provide automobile and long-term bicycle parking for the Project.

2. Project Location and Surrounding Uses

As shown in Figure A-1 on page A-2, the Project Site is located in the Central City Community Plan area of the City of Los Angeles (City), more specifically in the Civic Center South area of Downtown. The site consists of six parcels (APN 5149-008-029, -087, -088, -089, -907, -908) located at 213 South Spring Street, 200–210 South Broadway, and 232–238 West 2nd Street.

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[1] *For ease of reference, the roadways in the Project vicinity may be referred to herein without a directional indicator (e.g., Broadway, 2nd Street, and Spring Street). Furthermore, directional references have been simplified (i.e., Broadway actually borders the Project Site to the northwest but is described herein as the west).*

[2] *Metro owns the portions of the Project Site where the new portal and subsurface station facilities will be located. Metro's property is included in the tract map for the Project.*

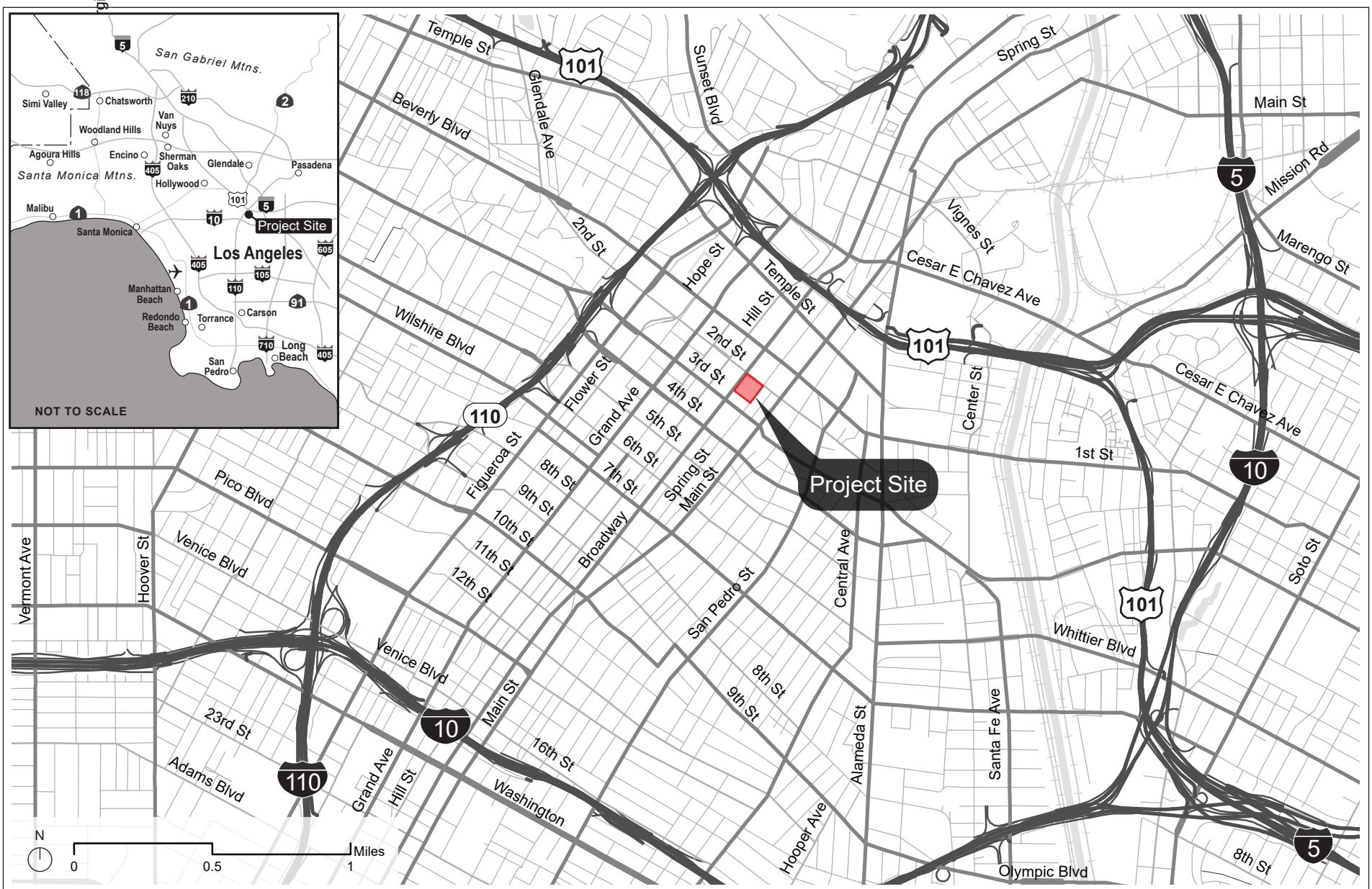

Figure A-1
Project Location Map

Source: LA GIS, 2016; Eyestone Environmental, 2016.

Primary regional access is provided by the Hollywood Freeway (US-101), which runs northwest/southeast approximately 0.4 mile north of the Project Site; the Harbor Freeway (CA-110), which runs north/south approximately 0.6 mile to the west; and the Santa Monica Freeway (I-10), which runs east-west and is located approximately 1.6 miles to the south. The Avenues (as defined in the City's Mobility Plan 2035) that provide local access to the Project Site and vicinity include 2nd Street, 3rd Street, Broadway, and Spring Street; 1st Street, which also provides local access near the Project Site, is classified as a Boulevard (as defined in the Mobility Plan 2035) in the Project Vicinity.

The Project Site is surrounded by a mix of commercial office, government and civic office, retail, and residential uses contained in a range of low-rise to high-rise buildings, which are physically separated from the Project Site by local roadways. Immediately to the west is an existing surface parking lot and 10-story office building fronting Broadway. To the immediate north across 2nd Street is Los Angeles Times Square, which includes an 11-story office building and a six-level parking structure fronting 2nd Street. East of the Project Site across Spring Street are single-story commercial buildings and a six-level parking structure. To the south is a surface parking lot and six-story apartment building (Hosfield Building) fronting Broadway, as well as a surface parking lot and five-story apartment building (Douglas Building Lofts) fronting Spring Street.

The Project Site lies at the northern end of the Broadway Theater and Entertainment District Community Design Overlay (CDO) area, where development is encouraged to reflect the overall vision of a cohesive, pedestrian-friendly, and vibrant entertainment, commercial, and mixed-use district. The immediate area is defined by several iconic buildings, both old and new, including the Bradbury Building to the south, the Los Angeles Times buildings and City Hall to the north, the new 11-story U.S. federal courthouse on Broadway between 1st and 2nd Streets, the 10-story Los Angeles Police Department (LAPD) Headquarters, and the 15-story Caltrans buildings to the north and east, respectively. Residential uses in the Project vicinity include the 50-unit Douglas Building Lofts at 257 South Spring Street, the 135-unit Higgins Building Lofts at 108 West 2nd Street, and the seven-story, 40-unit Pan American Lofts at 253 South Broadway.

An aerial photograph depicting on-site and surrounding uses is provided in Figure A-2 on page A-4.

3. Background and Existing Site Conditions

a. Existing Uses

As shown in Figure A-2, the northern portion of the Project Site is developed with a surface parking lot, which is currently in use as a staging area for construction of the

Figure A-2
Aerial Photograph of the Project Vicinity

Source: Google Earth Pro, 2016; Eyestone Envrionmental, 2016.

Metro Regional Connector 2nd Street/Broadway rail station and portal. Pursuant to a right of entry agreement, Metro has had exclusive control and use of the surface parking area since March 2015 and will continue to use it as a construction staging/laydown location for the Regional Connector project until up to September 2021. At that time, control of the surface parking lot (with the exception of the portal area), will revert back to the Applicant. The surface parking lot previously included 99 vehicular parking spaces.

The southern portion of the Project Site contains a five-story, approximately 67-foot-tall parking structure that includes rooftop parking and two subterranean levels. The structure currently provides 1,460 vehicular spaces, which are used for parking by tenants of Los Angeles Times Square, including the Los Angeles Times, as well as other businesses and commuters in the immediate area. Access to the parking structure is provided via one driveway on Broadway and two driveways on Spring Street.

Current landscaping on the Project Site is limited to street trees and a narrow landscaped parkway that traverses the center of the site along the northerly edge of the existing parking structure. Trees in these areas include: 19 on-site trees that meet the City's minimum size threshold for regulation as non-protected trees (i.e., trees with a trunk diameter at breast height (dbh) greater than 8 inches); 12 on-site palm trees that also meet the City's minimum size threshold for regulation; and six street trees along Broadway and Spring Street, none of which meet the definition of a protected tree as defined in the City's Municipal Code, although all are at least 8 inches dbh.[3,4] The landscaped parkway also includes shrubs and limited areas of turf, along with park benches.

The Project Site is well served by transit and is located approximately 700 feet from the Civic Center/Grand Park Metro Purple and Red Line station (located at the southwest corner of 1st Street and Hill Street). In addition, as previously mentioned, a Metro Regional Connector portal and station are currently under construction on-site. The site is also served by Metro Bus Lines 2, 4, 30, 33, 35, 40, 45, 68, 83, 84, 92, 302, 330, 728, 733, 745, and Los Angeles Department of Transportation (LADOT) Dash Line D.

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[3] *Palms often are not considered trees because they lack a vascular cambium, which causes tree trunk diameters to expand over time; thus, they are listed separately herein. Palms are not specifically addressed in City requirements.*

[4] *Psomas, Tree Inventory Report for the Tribune—South Parcel Project Site at 213 South Spring Street in the City of Los Angeles, California, Revised September 9, 2016; see Appendix A.*

b. Land Use and Zoning Designations

The Project Site is located entirely within the Central City Community Plan area, with a land use designation of Regional Center Commercial. The site is zoned [Q]C2-4D-CDO-SN (Commercial, Height District 4 with D limitation, Broadway Theater and Entertainment District Community Design Overlay, Historic Broadway Sign Supplemental Use District). Height District 4 with a D limitation allows a floor area ratio (FAR) of 6.0:1. The site is also subject to [Q] conditions, which were established by Ordinance No. 180,871 in 2009 as part of the adoption of the Broadway Theater and Entertainment District Design Guide. The [Q] conditions prohibit certain types of land uses, particularly on the ground floor along the streetwall; dictate building form and massing, including building heights and setbacks along the streetwall, lot coverage requirements for buildings over 150 feet in height, and ground floor treatments; and specify the location of parking and mechanical equipment. Signage regulations were originally included in the [Q] conditions but were later removed by Ordinance No. 184,055 in 2016 and replaced with the Historic Broadway Sign Supplemental Use District (Broadway Sign District). The Broadway Sign District supports and enhances historic preservation, economic development, and revitalization of the Broadway Theater and Entertainment District and allows for a variety of signage that contributes to its historic nature.

The Project Site is located in the Greater Downtown Housing Incentive Area, which allows an unlimited number of dwelling units in residential projects. In addition, the Project Site is subject to or located within the following: Broadway Streetscape Plan; Transit Priority Area (TPA); City Center Redevelopment Project Area; Los Angeles State Enterprise Zone; Adaptive Reuse Incentive Area; and a Metro Rail Project Area based on construction of the Metro Regional Connector portal and station within the site. In addition, a 5-foot Building Line was established along Broadway by Ordinance No. 75,667.

4. Description of Proposed Project

a. Overview of the Proposed Development

As previously discussed, the 222 West 2nd Project involves the development of a 30-story, 449-foot-tall, mixed-use building with 107 residential units (137,347 square feet), approximately 7,200 square feet of ground level commercial retail floor area, and 534,044 square feet of office uses.[5] The 2.71-acre Project Site also would house the Metro Regional Connector 2nd Street/Broadway rail station and portal, which are currently under

[5] *The building's height would measure 435 feet at the highest roofline and 449 feet at the top of the highest parapet, which would be set back from the roofline.*

construction. Based on a total of 688,401 square feet of floor area (including the Metro portal), the Project Site would have an FAR of 5.83:1, in conformance with the Project Site's [Q]C4-2D-CDO-SN zoning classification. Refer to Figure A-3 on page A-8 for a conceptual site plan of the Project.

In general, the proposed uses would be located in distinct areas of the new building. The ground floor would include commercial spaces fronting 2nd and Spring Streets, as well as the interior of the site (i.e., facing the Metro portal and the pedestrian paseo), with a residential lobby and loading area located along Spring Street.[6] Office space would be provided on levels 2 through 22, while the residential uses would be on levels 23 through 30. The proposed residences would include 12 studios, 42 one-bedroom units, 40 two-bedroom units, and 13 three-bedroom units ranging from approximately 650 square feet to 1,630 square feet in size. In addition, a single basement level would house mechanical rooms and storage.

As shown in the renderings provided in Figure A-4 and Figure A-5 on pages A-9 and A-10, the proposed building has been designed as a series of stacked volumes of varying sizes (floorplates), with shifting footprints and alternating types of curtain walls, capped by a bronze "crown." Levels 1 through 7 would comprise one volume and serve as the building podium, with levels 2 through 7 extending over the Metro portal. Levels 8 through 14 would comprise the next volume, which would be stepped back substantially from Broadway and slightly from 2nd Street. Levels 15 through 18 and levels 19 through 26 also would be separate volumes, with the footprint of each shifting back and forth in relation to the adjacent streets. Levels 27 through 30 would comprise the smallest volume, which would be stepped back the furthest from both Broadway and 2nd Street. The highest two volumes, levels 27 through 30 and the eastern half of levels 19 through 26, would include a bronze façade, serving as the building "crown." Overall, the height and massing of the building would shift away from Broadway toward Spring Street.

The shifting volumes in the building design would create a series of rooftop decks and terraces. Amenity decks offering a variety of social and community spaces would be provided on levels 8, 15, 19, and 27 and would include landscaped terraces, rooftop gardens, gathering spaces including barbeque and outdoor dining areas, and a swimming pool. Indoor recreational spaces would include a fitness center, two common rooms, and a lounge. Private balconies also would be provided on various levels for both residences and some of the office uses. A total of 27,765 square feet of useable common open space and 800 square feet of useable private open space would be provided for Project residents.

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[6] *Operating hours for the loading dock would be 24 hours per day, seven days per week.*

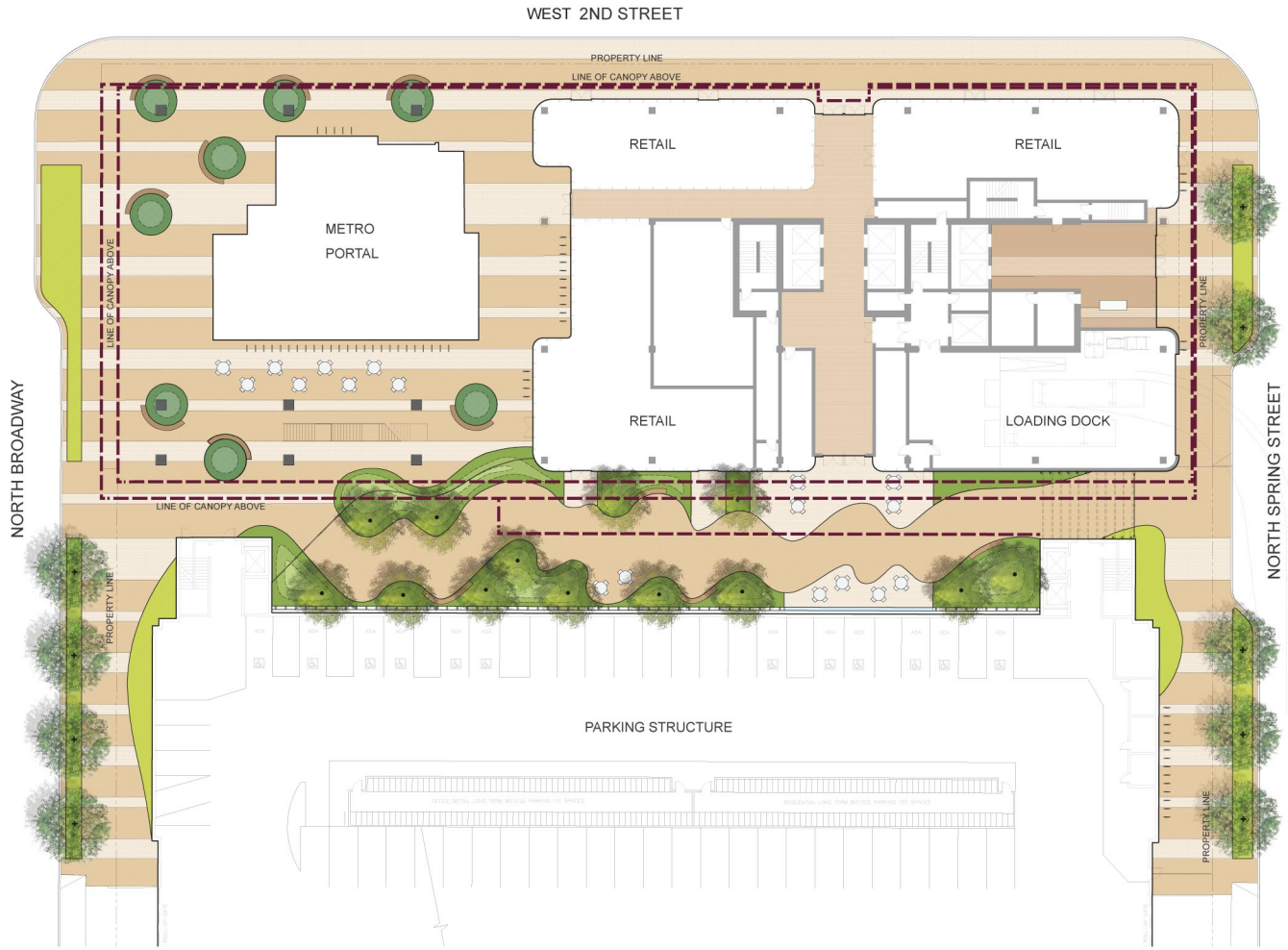

Figure A-3
Ground-Level Conceptual Site Plan

Source: Gensler, 2016.

Figure A-4
Conceptual Rendering—View from Broadway

Source: Gensler, 2016.

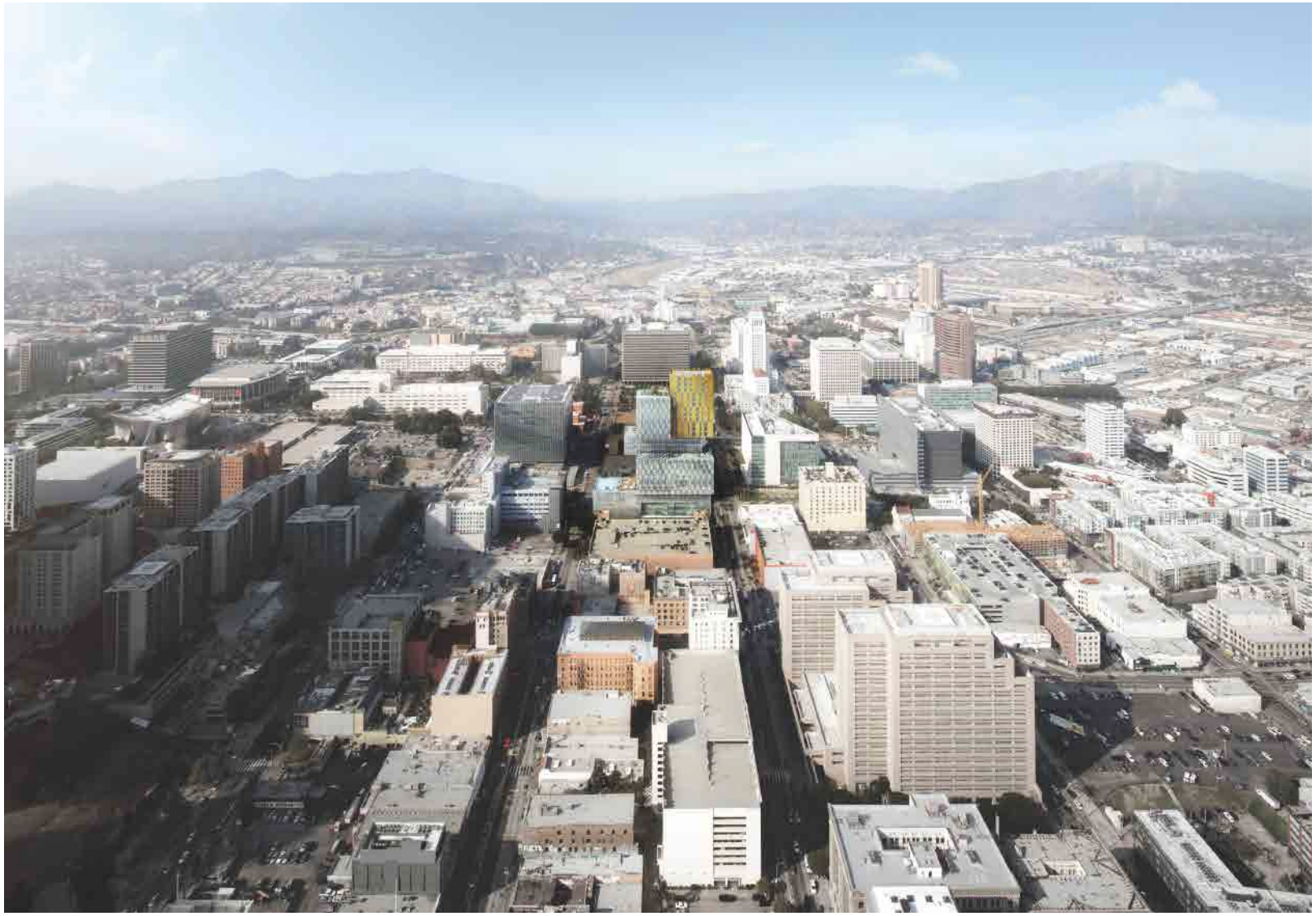

Figure A-5
Conceptual Rendering—Aerial View from the South

Source: Gensler, 2016.

A landscaped passage or paseo would be located between the new building and the existing parking structure to the south and would form a pedestrian pathway from Broadway and the Metro portal across the site to Spring Street. This paseo would include canopy trees, a variety of shrubs and grasses, planted trellises and potentially a water wall feature, benches and café seating, and permeable paving. In addition, street trees and streetscape plantings would be introduced along Broadway and Spring Street. The Project's landscaping would include drought-tolerant plants including both native and adaptive native plant materials. Further, the landscape plan would incorporate an efficient irrigation system.

As previously indicated, the Metro Regional Connector 2nd Street/Broadway rail station and portal, currently under construction, would be located at the northwest corner of the Project Site. The at-grade portal would include ticket booths, kiosks, information signs, stairs, escalators, and elevators to serve the subterranean Metro station. The mixed-use building would be built above the Metro portal, with the base of level 2 essentially serving as a roof over the station entrance. A plaza surrounding the portal would include planted areas, benches and café seating, and bicycle parking. The design of the plaza around the portal would be integrated and consistent with the paseo, thus creating a larger, public plaza at Broadway and 2nd Street that extends across the center of the site to Spring Street. Upon completion, the Metro Regional Connector would consist of a 1.9-mile underground light-rail system connecting the Metro Gold Line to the 7th Street/Metro Center station. The Regional Connector includes the 2nd Street/Broadway rail station, as well as two additional new stations in the Downtown area.

Project lighting would include low-level exterior lights at the perimeter of the building, in the canopy over the Metro portal, and in the paseo, as needed, for aesthetic, security, and wayfinding purposes. All lighting would comply with current energy standards and codes while providing appropriate light levels to accent signage, architectural features, and landscaping elements. Light sources would be shielded and/or directed toward Project Site areas to minimize light spill-over to neighboring buildings and the surrounding area. Additionally, new street and pedestrian lighting within the public right-of-way would provide appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties, in compliance with applicable City regulations and with approval by the Bureau of Street Lighting. Primary façade materials would include glass and various types of metal panels such as anodized aluminum, stainless steel, or bronze. Glass would be selected for qualities such as low reflectivity to reduce glare; energy efficiency to limit solar heat gain; high visibility for adequate light transmission; and acoustic performance to reduce noise from outside.

Project signage would be integrated with and compliment the overall aesthetic character of the Project and comply with the standards and goals of the Historic Broadway

Sign Supplemental Use District. Project signage could include general ground level and wayfinding pedestrian signage around the perimeter of the building and in the paseo, building identification signs, and other sign types. Wayfinding signs would be located at access points to the on-site parking garage, paseo, commercial and residential entries, corridors, and elevator lobbies. Metro signage would be integrated with the overall signage concept. No off-premises billboard advertising is proposed as part of the Project.

b. Parking and Access

The existing five-level parking structure located on the southern portion of the Project Site would remain and provide the required vehicular parking and long-term bicycle parking for the proposed uses. More specifically, the existing 1,460 parking spaces within the garage would be reconfigured to provide 1,436 vehicular spaces and 218 long-term bicycle parking spaces (plus an additional 68 short-term bicycle parking spaces to be provided outside and adjacent to the parking structure and the new building, as well as within the Metro plaza). The Project would require 601 tenant vehicular parking spaces per Los Angeles Municipal Code (LAMC), based on bicycle parking and transit credit deductions, plus 0.25 spaces per residential unit of guest parking pursuant to Advisory Agency Parking Policy 2006-2.[7] Accordingly, surplus parking would remain available for the nearby Los Angeles Times buildings located on the north side of 2nd Street (subject to several off-site parking covenants recorded on the Project Site), as well as for lease to other uses in the area.[8]

Access to the parking structure would continue to occur via one existing driveway on Broadway and two existing driveways on Spring Street. In addition, one new driveway on Spring Street is proposed to access the loading area for the new building.

The Project does not include street dedications. However, sidewalk easements would be provided along Broadway, 2nd Street, and Spring Street in order to comply with the City's General Plan Mobility Plan 2035 standards.

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[7] *Parking requirements, including required bicycle parking and credit reductions, are based on LAMC Sections 12.21.A4 (Off-Street Automobile Parking Requirements), 12.21.A4(i) (Exception Downtown Business District), 12.21.A4(k) (Fractional Space), 12.21.A4(p) (Exception for Central City Area), 12.21.A4(x)(3) (Exception for Specified Exception Areas), and 12.21.A16(a)(2) (Bicycle Parking for Commercial Uses). Parking will be fully addressed in the EIR to be prepared for the Project.*

[8] *Off-site parking covenants per County of Los Angeles Recorder Instrument Nos. 90-2043634, 97-1672752, 98-854779, and 05-1924091.*

c. Sustainability Features

The Project incorporates the principles of smart growth and environmental sustainability, as evidenced in its mixed-use nature, the Project Site's location within the established Downtown Los Angeles employment hub, proximity to transit and walkable streets, and the presence of existing infrastructure needed to service the proposed uses. Additionally, a number of specific sustainable design components would be incorporated into the Project, including the following:

- Water-efficient plantings with drought-tolerant species;
- Shade trees in public areas;
- Green walls in some outdoor areas;
- Energy-efficient lighting;
- Fenestration designed for solar orientation;
- Use of recyclable materials for flooring and demisable partitions in limited amounts;
- Pedestrian- and bicycle-friendly design with short-term and long-term bicycle parking;
- Electric vehicle charging infrastructure; and
- Permeable pavement in the paseo.

5. Construction Activities and Phasing

The proposed improvements would replace the existing surface parking lot on the northern portion of the Project Site, which is currently used for construction staging for the new on-site Metro 2nd Street/Broadway rail station and portal. In addition, all 37 existing trees on the Project Site are planned for removal and would be replaced with new landscaping, including canopy trees, street trees, and streetscape plantings.

Project construction is expected to occur in one primary phase, with no overlap with construction of the Metro portal and station on-site. As previously discussed, the on-site portal and station are currently under construction, and the Metro Regional Connector line is forecasted to open in 2021. Construction of the Project is anticipated to begin in 2022 and be complete by 2025. Construction activities would occur in accordance with LAMC requirements, which prohibit construction between the hours of 9:00 P.M. and 7:00 A.M.

Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday. Construction activities would require approximately 7,000 cubic yards of grading, all of which would be exported off-site to Chiquita Canyon Landfill and/or Irwindale Landfill. The haul route to/from Chiquita Canyon Landfill is anticipated to follow segments of 2nd Street, Spring Street, 3rd Street, and Aliso Street in Downtown Los Angeles; CA-110, US-101, CA-170, and I-5; as well as Newhall Ranch Road, SR-126, and Henry Mayo Drive in Castaic. Alternatively, the haul route to/from Irwindale Landfill would follow segments of 2nd Street, Spring Street, 4th Street, Los Angeles Street, El Monte Busway East, and Arcadia Street in Downtown; US-101 and I-10; and Vincent Drive in Irwindale.

6. Necessary Approvals

The City of Los Angeles has the principal responsibility for approving the Project. Approvals required for development of the Project may include, but are not limited to, the following:

- Vesting Zone Change to amend Ordinance No. 180,871 to eliminate or modify [Q] Condition No. 7 (regarding 30 percent minimum and 40 percent maximum lot coverage for the portion of buildings over 150 feet in height) to reflect the Project's proposed design (per LAMC Sections 12.32 G and 12.32 Q);

- Site Plan Review for a project with an increase of 50,000 square feet of non-residential floor area and 50 or more dwelling units (per LAMC Section 16.05);

- Design Overlay Plan Approval for a project in the Broadway CDO Zone (per LAMC Section 13.08 E);

- Vesting Tentative Tract Map No. 74320 for a 10-lot airspace subdivision for merger, resubdivision, and condominium purposes, with a request for haul route approval (per LAMC Section 17.01 and 17.15);

- Building Line Removal of 120 feet along the east side of Broadway, established by Ordinance No. 75,667 on October 16, 1935 (per LAMC Section 12.32 R); and

- Other discretionary and ministerial permits and approvals that may be deemed necessary, including but not limited to temporary street closure permits, grading permits, excavation permits, foundation permits, and building permits.

In addition, the following agencies are considered Responsible Agencies under CEQA whose approval or permits from whom may be required:

- South Coast Air Quality Management District (SCAQMD);

- Los Angeles Regional Water Quality Control Board (LARWQCB); and
- CRA/LA.

B. Explanation of Checklist Determinations

Attachment B:
Explanation of Checklist Determinations

The following discussion provides responses to each of the questions set forth in the City of Los Angeles Initial Study Checklist. The responses below indicate those issues that are expected to be addressed in an Environmental Impact Report (EIR) and demonstrate why other issues would not result in potentially significant environmental impacts and thus do not need to be addressed further in an EIR. The questions with responses that indicate a "Potentially Significant Impact" do not presume that a significant environmental impact would result from the Project. Rather, such responses indicate those issues that will be addressed in an EIR, with precise impact conclusions reached as part of the analysis within that future document.

I. Aesthetics

Would the project:

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

Less Than Significant Impact. A scenic vista is a broad view that includes a visual resource(s). The Central City Community Plan designates the Harbor Freeway (CA-110), which runs north/south approximately 0.6 mile to the west of the Project Site, as a scenic freeway, as it offers northbound views of the Downtown skyline and the San Gabriel Mountains in the distance.[1] The Project involves the development of a 30-story mixed-use building on a site that includes a five-story parking structure (which would remain) but currently lacks permanent structures where the proposed building would be located.[2] As such, the Project could be visible from surrounding scenic view points, including from CA-110. However, the Project is a mixed-use residential and employment center project

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[1] *City of Los Angeles, Central City Community Plan, General Plan Land Use Map, July 7, 2009.*

[2] *The northern portion of the Project Site, where the proposed 30-story building would be built, is currently used for construction staging associated with the Los Angeles County Metropolitan Transportation Authority (Metro) Regional Connector transit project. Metro is constructing a below grade rail station and station portal (the 2nd Street/Broadway station) in this portion of the site, which will be completed and open to the public before construction of the proposed Project commences. Prior to Metro's occupation of this portion of the Project Site, it was used as a surface parking lot.*

that will be located on an infill site within a transit priority area.[3] Accordingly, under Senate Bill (SB) 743, aesthetic impacts of the Project shall not be considered a significant impact on the environment. Nevertheless, for informational purposes only, the EIR will analyze the Project's potential effects on scenic vistas.

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?

No Impact. The Project Site currently includes a five-story parking structure and a temporary construction staging area in a portion of the site previously developed as a surface parking lot (where Metro's future 2nd Street/Broadway station portal is currently being constructed), as well as a narrow landscaped parkway that traverses the center of the site and several street trees, none of which are considered scenic resources. There are no historic buildings or structures located on-site. Furthermore, there are no unique geologic or topographic features located on the Project Site, such as hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands. Although CA-110 located 0.6 mile west of the Project Site is designated as a scenic freeway within the Central City Community Plan, no impacts to scenic resources within a City-designated scenic highway would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. The Project would change the visual character and quality of the Project Site and its surroundings by introducing a 30-story mixed-use building on a site that currently includes a five-story parking structure and a temporary construction staging area in a portion of the site previously developed as a surface parking lot, which will contain Metro's 2nd Street/Broadway station portal. While the Project could have the potential to degrade the existing visual character or quality of the Project Site and the surrounding area, the Project is a mixed-use residential and employment center project that will be located on an infill site within a transit priority area. Accordingly, under SB 743, aesthetic impacts of the Project shall not be considered a significant impact on the environment. Nevertheless, for informational purposes only, the EIR will analyze the Project's potential effects on visual character and quality.

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[3] *Los Angeles Department of City Planning, Great Streets Program Interactive Map, Transit Priority Area Layer, https://ladcp.maps.arcgis.com/apps/webappviewer/index.html?id=02d509dfe1ea458da1157b516249f4d9, accessed January 3, 2017.*

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

Less Than Significant Impact. The Project Site currently generates low to moderate levels of artificial light and glare typical of urbanized areas. Existing light sources on-site include low-level security lighting, vehicle headlights, and street lighting, while existing glare sources include vehicle surfaces within unscreened or open portions of the parking structure, including the rooftop parking level. The Project would introduce new sources of light and glare that are typically associated with residential and commercial buildings, such as architectural lighting, signage lighting, interior lighting, security and wayfinding lighting, and building surfaces such as metal and glass. In addition, the Project would introduce a 30-story mixed-use building that could potentially shade adjacent land uses that may be sensitive to shading. However, the Project is a mixed-use residential and employment center project that will be located on an infill site within a transit priority area. Accordingly, under SB 743, aesthetic impacts of the Project shall not be considered a significant impact on the environment. Nevertheless, for informational purposes only, the EIR will analyze how the Project's light, glare, and shading will affect the Project area. If appropriate, Project design features (PDFs) addressing light and glare will be incorporated into the Project and detailed in the EIR.

II. Agricultural and Forest Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

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

No Impact. The Project Site is located in an urbanized area and currently includes a five-story parking structure and a temporary construction staging area in a portion of the site previously developed as a surface parking lot (where Metro's future 2nd Street/Broadway station portal is currently being constructed). No agricultural uses or operations occur on-site. In addition, the Project Site and surrounding area are not

mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.[4] As such, the Project would not convert farmland to non-agricultural use. No impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is not zoned for agricultural use under the Los Angeles Municipal Code (LAMC). Furthermore, no agricultural zoning is present in the surrounding area. The Project Site and surrounding area are not enrolled under a Williamson Act Contract.[5] Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts to agricultural uses or a Williamson Act Contract would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is located in an urbanized area and does not include any forest or timberland.[6] Further, the Project Site is currently zoned for commercial land uses and is not zoned for timberland or forest land. Therefore, the Project would not rezone forest land or timberland as defined by the Public Resources Code. No impacts to forest land or timberland would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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[4] *California Department of Conservation, California Important Farmland Finder, http://maps.conservation.ca.gov/ciff/ciff.html, accessed October 11, 2016.*

[5] *California Department of Conservation, Los Angeles County Williamson Act FY 2015/2016, ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf, accessed October 11, 2016.*

[6] *California Department of Forestry and Fire Protection, Fire and Resources Assessment Program, Land Cover Map, Multi-Source Data Compiled in 2006, http://frap.fire.ca.gov/data/frapgismaps/pdfs/fvegwhr13b_map.pdf, accessed October 11, 2016.*

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

No Impact. As mentioned above, the Project Site is located in an urbanized area and does not include any forest land or timberland. Therefore, the Project would not result in the loss or conversion of forest land. No impacts to forest land would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

No Impact. As described above, the Project Site is located within an urbanized area. The Project Site and surrounding area are not mapped as farmland or zoned for farmland or agricultural use and do not contain any agricultural uses. As such, the Project would not result in the conversion of farmland to non-agricultural use. No impacts to farmland would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

III. Air Quality

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

a. Conflict with or obstruct implementation of the South Coast Air Quality Management District (SCAQMD) Plan or Congestion Management Plan?

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than ten microns in size (PM_{10}), particulate matter less than 2.5 microns in size ($PM_{2.5}$), and lead).[7,8] As such, the Project would be subject to the SCAQMD's 2012 Air Quality Management Plan (AQMP).[9] The AQMP contains a

[7] *A redesignation request to Attainment for the 24-hour PM_{10} standard is pending with the United States Environmental Protection Agency (USEPA).*

[8] *Lead has a Partial Nonattainment designation for the Los Angeles County portion of the Basin only.*

[9] *A Revised Draft 2016 AQMP was published in October 2016; however, the 2012 AQMP remains in effect at this time.*

comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development, and the environment.[10] With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area.

Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, Project development could have an adverse effect on the SCAQMD's implementation of the AQMP. Therefore, further analysis of this topic in the EIR is required to determine the Project's consistency with the SCAQMD's AQMP.

With regard to the Project's consistency with the Congestion Management Program (CMP) administered by the Los Angeles County Metropolitan Transportation Authority (Metro), see Response to Checklist Question XVI.b, below.

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

Potentially Significant Impact. The Project would result in increased air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sources of construction-related pollutants would include construction worker vehicle trips, the operation of construction equipment, site grading and preparation activities, and the application of architectural coatings. During Project operation, air pollutants would be emitted on a daily basis from motor vehicle travel, energy consumption, and other on-site activities. Construction and operation of the Project has the potential to result in the violation of air quality standards or contribute to an existing or projected air quality violation. Therefore, further analysis of this topic in the EIR is required to determine the Project's impacts related to construction and operational air pollutant emissions.

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

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard?

Potentially Significant Impact. As discussed above, Project construction and operation would emit air pollutants in the Basin, which is currently in non-attainment of federal and state air quality standards for ozone, PM_{10}, $PM_{2.5}$, and lead. Therefore, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact when combined with other existing and future emission sources in the Project area. As such, further analysis of this topic in the EIR is required to determine the Project's potential to result in cumulatively considerable impacts from criteria pollutants.

d. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. As discussed above, the Project would result in increased air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors located in the vicinity of the Project Site include residential uses, which may be exposed to substantial pollutant concentrations. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential to result in exposure of sensitive receptors to substantial pollutant concentrations.

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

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Project construction would use conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402.[11]

According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. While on-site trash receptacles introduced on-site would have the potential to create odors, trash receptacles

[11] *SCAQMD Rule 402: A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.*

would be located, contained, and maintained in a manner that promotes odor control. Thus, no substantially adverse odor impacts are anticipated. Thus, impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

IV. Biological Resources

Would the project:

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

Less Than Significant Impact. The Project Site is located in an urbanized area and includes a five-story parking structure and a temporary construction staging area in a portion of the site previously developed as a surface parking lot (where Metro's future 2nd Street/Broadway station portal is currently being constructed). The Project Site includes limited ornamental landscaping, including non-protected tree species, in a narrow landscaped parkway, as well as several street trees. Due to the developed nature of the Project area, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Thus, the Project would not 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 Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). Impacts to these species would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is located in an urbanized area and includes a five-story parking structure and a temporary construction staging area in a portion of the site previously developed as a surface parking lot (where Metro's future 2nd Street/Broadway station portal is currently being constructed). No riparian or other sensitive natural community exists on the Project Site or in the immediate area. Thus, the Project would not have an effect on any riparian habitat or other sensitive natural community, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is located in an urbanized area and includes a five-story parking structure and a temporary construction staging area in a portion of the site previously developed as a surface parking lot (where Metro's future 2nd Street/Broadway station portal is currently being constructed). No water bodies or federally protected wetlands, as defined by Section 404 of the Clean Water Act, exist on the Project Site or in the vicinity. As such, the Project would not have any effect on federally protected wetlands, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

Less Than Significant With Mitigation Incorporated. As discussed above, the Project Site is located in an urbanized area and includes a five-story parking structure and a temporary construction staging area in a portion of the site previously developed as a surface parking lot (where Metro's future 2nd Street/Broadway station portal is currently being constructed). There are no established native resident or migratory wildlife corridors on the Project Site or in the vicinity. Accordingly, development of the Project would not impact any regional wildlife corridors or native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity.

According to the Tree Inventory Report prepared for the Project and included as Appendix IS-1 of this Initial Study, there are no native or protected trees located on-site or within the street parkway. Trees in these areas include: 19 on-site trees that meet the City's minimum size threshold for regulation as non-protected trees (i.e., trees with a trunk diameter at breast height (dbh) greater than 8 inches); 12 on-site palm trees that also meet the City's minimum size threshold for regulation; and six street trees along Broadway and Spring Street, none of which meet the definition of a protected tree as defined in the City's Municipal Code, although all are at least 8 inches dbh.[12,13] The landscaped parkway also includes shrubs and limited areas of turf.

[12] *Palms often are not considered trees because they lack a vascular cambium, which causes tree trunk diameters to expand over time. Palms are not specifically addressed in City requirements. Additionally,* *(Footnote continued on next page)*

Although unlikely given the urbanized nature of the Project area, the on-site trees and adjacent street trees (all of which are proposed for removal) could potentially provide temporary suitable habitat for nesting migratory birds, which are protected under the federal Migratory Bird Treaty Act (MBTA), as well as Sections 3503, 3503.5, 3511, and 3513 of the California Fish and Game Code. Together, these existing federal and state regulations protect all native migratory birds and their nests and make it unlawful to "take" (e.g., hunt, pursue, kill, harm, harass) any migratory bird and its active nest(s). To ensure the Project complies with these federal and state regulations, the following mitigation measure is proposed:

Mitigation Measure IS-1: To the extent feasible, Project tree removal activities shall be scheduled outside the nesting season for migratory birds (typically from February 15 to August 31). However, to the extent that Project tree removal activities must occur during the nesting season, all suitable habitat shall be thoroughly surveyed by a qualified biologist for the presence of nesting birds prior to removal. If any active nests are detected, the area shall be flagged, along with a minimum 50-foot buffer (this buffer may range between 50 and 300 feet, as determined by the monitoring biologist), and shall be avoided until the nesting cycle has completed or the monitoring biologist determines that the nest has failed. The results of the survey(s) shall be reported to the City of Los Angeles (i.e., the lead agency) to document compliance with applicable state and federal laws pertaining to the protection of nesting birds.

With implementation of the mitigation measure identified above, impacts would be less than significant. No further analysis of this topic in the EIR is required.

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)?

Less Than Significant Impact. The City of Los Angeles Protected Tree Ordinance (LAMC Chapter IV, Article 6) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least 4 inches in diameter at breast height. These tree species are defined as protected by the City. Trees that have been planted as part of a

southern live oaks are not protected by the City's tree ordinance, as this species is not indigenous to California.

[13] *Psomas, Tree Inventory Report for the Tribune—South Parcel Project Site at 213 South Spring Street in the City of Los Angeles, California, Revised September 9, 2016; see Appendix IS-1 of this Initial Study.*

tree planting program are exempt from this Ordinance and are not considered protected. The Ordinance prohibits, without a permit, the removal of any regulated protected tree, including "acts which inflict damage upon root systems or other parts of the tree..." and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety.

As discussed above, landscaping within the Project Site is limited, and no native or protected trees are located within the Project Site. Trees within the Project Site include:[14]

- Nineteen on-site trees that meet the City's minimum size threshold for regulation as non-protected trees (i.e., trees with a trunk diameter at breast height (dbh) greater than 8 inches)—these trees include 13 Canary Island pines (*Pinus canariensis*), five sweetgums (*Liquidambar styraciflua*), and one tree-of-heaven (*Ailanthus altissima*).

- Twelve on-site palm trees that also meet the City's minimum size threshold for regulation—these palm trees include three king palms (*Archontophoenix alexandrae*) and nine Mexican fan palms (*Washingtonia robusta*).[15]

- Six street trees along Broadway and Spring Street, all of which are at least 8 inches dbh—these street trees include two fern pines (*Podocarpus gracilior*), one Indian laurel fig (*Ficus microcarpa*), and three southern live oaks (*Quercus virginiana*).

None of these trees meet the definition of a protected tree as defined in the City's Municipal Code, although all are at least 8 inches dbh. The southern live oaks are not protected by the City's tree ordinance as this species is not indigenous to California. The Indian laurel fig will be removed by Metro during construction of the on-site 2nd Street/Broadway rail station (below grade) and station portal prior to Project construction.

All trees on the Project Site are proposed for removal. As mature trees with established root systems and palms with smaller fibrous root systems are unlikely to survive relocation and transplanting, relocation is not recommended for any of the trees. Pursuant to the requirements of the City of Los Angeles Urban Forestry Division, street trees would be replaced on a 2:1 basis. Furthermore, in accordance with LAMC requirements, an estimated 42 new trees would be planted within the Project Site. The

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[14] *Ibid.*

[15] *Palms often are not considered trees because they lack a vascular cambium, which causes tree trunk diameters to expand over time. Palms are not specifically addressed in City requirements. Additionally, southern live oaks are not protected by the City's tree ordinance, as this species is not indigenous to California.*

new tree species would be drought-tolerant and/or climate-adapted and would primarily require moist to dry soil conditions. In addition, smart irrigation systems with flow sensors and drip tubing delivery systems would be used. Thus, the planting of new tree species would be selected to enhance the pedestrian environment, convey a distinctive high quality visual streetscape, and complement trees in the surrounding area. Therefore, impacts related to any conflict with local policies or ordinances protecting biological resources would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is located in an urbanized area and includes a five-story parking structure and a temporary construction staging area in a portion of the site previously developed as a surface parking lot (where Metro's 2nd Street/Broadway station portal is currently being constructed). The Project Site includes limited ornamental landscaping in the form of a narrow landscaped parkway and several street trees. As such, the Project Site does not support any important habitat or natural communities. Furthermore, the USFWS database of conservation plans and agreements does not show any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans applicable to the Project Site.[16] Thus, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other related plan, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

V. Cultural Resources

Would the project:

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

Potentially Significant Impact. CEQA Guidelines Section 15064.5 defines a historic resource as a resource that is: (1) listed in or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Public Resources Code Section 5020.1(k)); or (3) identified as significant in an historical resources survey (meeting the criteria in Public

[16] *USFWS, Conservation Plan and Agreements Database, Region 8, http://ecos.fws.gov/conserv_plans/public.jsp, accessed October 13, 2016.*

Resources Code Section 5024.1(g)). Additionally, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be historically significant if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register. The local register of historical resources is managed by the Los Angeles Office of Historic Resources, which operates SurveyLA, a comprehensive program to identify potentially significant historic resources throughout the City.

The Project Site includes a five-story parking structure and a temporary construction staging area in a portion of the site previously developed as a surface parking lot. Although no historical resources have been identified on-site, the Project Site lies at the northern end of the Broadway Theater and Entertainment District Community Design Overlay (CDO) area and the associated Historic Broadway Sign Supplemental Use District (Broadway Sign District), within which a number of historic and potentially historic resources are located. Other historic and potentially historic buildings also exist outside of these districts in the Project vicinity. Given the proximity of several off-site historic or potentially historic buildings, further analysis in the EIR is required to determine the Project's potential impacts with regard to historic resources.

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

Potentially Significant Impact. CEQA Guidelines Section 15064.5(a)(3)(D) defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

The Project Site is located within a highly urbanized area and has been subject to grading and development in the past. Thus, surficial archaeological resources that may have existed at one time likely have been previously disturbed or, to the extent not previously disturbed, may be disturbed as part of Metro's ongoing construction of the 2nd Street/Broadway rail station on the northern portion of the Project Site. Nonetheless, the Project would require grading, excavation to a maximum depth of 25 feet, including in areas of the Project Site where Metro is not excavating as part of its construction of the 2nd Street/Broadway rail station, and other construction activities that could have the

potential to disturb existing but undiscovered archaeological resources. Therefore, the EIR will provide further analysis of the Project's potential impacts to archaeological resources.

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

Potentially Significant Impact. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Although the Project Site has been previously graded and developed, the Project would require grading; excavation to a maximum depth of 25 feet, including in areas of the Project Site where Metro is not excavating as part of its construction of the 2nd Street /Broadway station; and other construction activities that could have the potential to disturb existing but undiscovered paleontological artifacts. Therefore, the EIR will provide further analysis of the Project's potential impacts to paleontological resources.

d. Disturb any human remains, including those interred outside of dedicated cemeteries (see Public Resources Code, Ch. 1.75, §5097.98, and Health and Safety Code §7050.5(b))?

Less Than Significant Impact. As discussed above, the Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. While the uncovering of human remains is not anticipated, if human remains are discovered during construction, such resources would be treated in accordance with state law, including CEQA Guidelines Section 15064.5, Public Resources Code Section 5097.98, and California Health and Safety Code Section 7050.5. Specifically, if human remains are encountered, work on the relevant portion of the Project Site would be suspended, and the Los Angeles Department of Public Works (LADPW) as well as the County Coroner would be notified immediately. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) would be notified within 24 hours, and NAHC guidelines would be adhered to in the treatment and disposition of the remains. Compliance with these regulatory standards would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. Therefore, the Project's impact on human remains would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

VI. Geology and Soils

The following analysis is based, in part, on the *Soils and Geology Report to Support the Environmental Impact Report* (Soils and Geology Report) dated August 16, 2016, and revised November 3, 2016, prepared by Geotechnologies, Inc., unless otherwise noted. This report is included as Appendix IS-2 of this Initial Study. In addition, relevant information is provided in the following report, which is on file with the Department of City Planning (Case No. VTT-74320): *Preliminary Geotechnical Engineering Investigation to Satisfy the Requirements for Filing a Vesting Tentative Tract Map with the Department of City Planning* (Geotechnical Investigation) dated August 11, 2016 and prepared by Geotechnologies, Inc.

Would the project:

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

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

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch). Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, buried thrust faults are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

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

Based on the Soils and Geology Report and a review of the City of Los Angeles General Plan Safety Element, the Project Site is not located within an established Alquist–Priolo Earthquake Fault Zone, nor is it within a City-designated Fault Rupture Study Area.[17,18] No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. The nearest designated Earthquake Fault Zone is associated with the active Hollywood Fault, located approximately 4.5 miles north of the Project Site. In addition, the active Raymond Fault is located approximately 5 miles to the north. Furthermore, although the Los Angeles segment of the active Puente Hills blind thrust fault lies beneath Downtown Los Angeles, it is located at a depth of approximately 4 miles according to USGS data and has no surface trace; as such, its potential for ground surface rupture is considered remote. Therefore, the potential for surface rupture due to faulting occurring beneath the Project Site is considered low, and as such, impacts would be less than significant. No mitigation measures would be required, and no further analysis of this topic in the EIR is required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active faults in the region. As previously stated, the closest active faults are the Hollywood Fault and Raymond Fault, located approximately 4.5 and 5 miles north of the Project Site. However, the Project would be designed and constructed in accordance with the most current Los Angeles Building Code regulations, which specify structural requirements for different types of buildings in a seismically active area, as well as the California Building Code. The California Building Code regulates building construction such that structures can withstand minor earthquakes without damage and major earthquakes without collapse. Additionally, the Project would be designed and constructed in accordance with the recommendations of a design-level geotechnical investigation. Accordingly, impacts with respect to strong seismic ground shaking would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact With Mitigation. Liquefaction involves a sudden loss in strength of saturated, cohesionless soils that are subject to ground vibration and

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[17] *State of California, California Geological Survey, Special Studies Zones for Los Angeles Quadrangle, dated January 1, 1977, http://gmw.consrv.ca.gov/shmp/download/quad/LOS_ANGELES/maps/LOSANGELES.pdf, accessed October 14, 2016.*

[18] *Los Angeles General Plan Safety Element, Exhibit A, Alquist–Priolo Special Study Zones & Fault Rupture Study Areas, November 1996, p. 47).*

results in temporary transformation of the soil to a fluid mass. If the liquefying layer is near the surface, the effects are much like that of quicksand for any structure located on it. If the layer is deeper in the subsurface, it may provide a sliding surface for the material above it. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine- to medium-grained, primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must be of a sufficient level to induce liquefaction.

The State Seismic Hazards Maps indicate the Project Site is located within a liquefaction zone, as does the City's Zone Information and Map Access System (ZIMAS).[19,20] This determination is based on groundwater depth records, soil type, and distance to a fault capable of producing a substantial earthquake. However, the proposed building has been designed to be supported on Tertiary-age bedrock of the Fernando Formation, which was encountered in site borings at depths between 15 and 22 feet below ground surface. Given the density and long tectonic history of the Fernando Formation, this bedrock is not considered susceptible to liquefaction. Nevertheless, given the Project Site's location within a liquefaction zone, the following mitigation measure would be implemented to ensure the use of engineered foundation design techniques appropriate for areas subject to liquefaction:

Mitigation Measure IS-1: All foundations to support the proposed structure shall bear in competent unweathered Fernando Formation bedrock. In particular, the high-rise portion of the structure shall be supported by a mat foundation system, bearing in competent Fernando Formation bedrock. The podium portion of the structure that will be underlain by the subterranean level shall be supported by conventional foundations, deepened to bear in competent Fernando Formation bedrock. In addition, the podium portion of the structure that will be built at-grade shall be supported by end-bearing belled caissons, deepened to bear in competent Fernando Formation bedrock; excepting therefrom any portions of the podium structure that connect to Metro's 2nd Street/Broadway rail station facilities structure.

All foundation excavations shall be observed by a qualified geotechnical engineer to verify penetration into the recommended bearing materials. These observation(s) shall be performed prior to

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[19] *State of California, California Geological Survey, Seismic Hazard Zones, Los Angeles Quadrangle, dated March 25, 1999, http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_la.pdf, accessed October 14, 2016.*

[20] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org, accessed October 14, 2016.*

the placement of reinforcement. If necessary, foundations shall be further deepened to extend into satisfactory geologic materials.

Alternatively, the proposed structure's foundations may be designed based on the findings of a site-specific, design-level geologic and geotechnical investigation(s) approved by the City, including but not limited to the use of proven methods generally accepted by registered engineers to reduce the risk of seismic hazards to a less than significant level, provided such recommendations meet or exceed applicable regulatory requirements, including, but not limited to, the version of the California Building Code, as adopted and amended by the City, in effect at the time of the City's approval of the geotechnical investigation(s); relevant state, County, and City laws, ordinances, and Code requirements; and current standards of practice designed to minimize potential geologic and geotechnical impacts. The Project also shall comply with the conditions contained within the City Department of Building and Safety's Geology and Soils Report Approval Letter for the Project, as it may be subsequently amended or modified.

With implementation of the mitigation measure identified above, impacts would be less than significant. No further analysis of this topic in the EIR is required.

iv. Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and characterized by flat topography with minimally sloping terrain. More specifically, the site grade descends gently to the southeast, with an elevation relief of four feet. In addition, based on the State Seismic Hazards Map, the Project Site is not located in a landslide area, nor is it mapped in the City's landslide inventory.[21,22,23] Project development would not substantially alter the existing topography of the site. Accordingly, there would be no impact with respect to landslides, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

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[21] *State of California, California Geological Survey, Seismic Hazard Zones, Los Angeles Quadrangle, dated March 25, 1999, http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_la.pdf, accessed October 14, 2016.*

[22] *Los Angeles General Plan Safety Element, Exhibit C, Landslide Inventory & Hillside Areas, November 1996, p. 51.*

[23] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org, accessed October 14, 2016.*

Less Than Significant Impact. Project development would require grading, excavation, and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. However, construction activities would occur in accordance with erosion control requirements, including grading and dust control measures, imposed by the City pursuant to grading permit regulations. Specifically, Project construction would comply with the Los Angeles Building Code, which requires necessary permits, plans, plan checks, and inspections to ensure the reduction of sedimentation and erosion effects. In addition, as discussed below under Response to Checklist Question IX.a, the Project would be required to have an erosion control plan approved by the City of Los Angeles Department of Building and Safety (LADBS), as well as a Storm Water Pollution Prevention Plan (SWPPP) pursuant to the National Pollutant Discharge Elimination System (NPDES) permit requirements. As part of the SWPPP, Best Management Practices (BMPs) would be implemented during construction to reduce sedimentation and erosion levels to the maximum extent possible. In addition, Project construction contractors would be required to comply with City grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion. Compliance with these regulatory requirements, including the implementation of BMPs, would ensure impacts related to soil erosion would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact With Mitigation. As discussed above, while the Project Site would be subject to ground shaking during a seismic event, it is not considered susceptible to landslides. There are no slopes or free-face earth retaining walls near the Project Site, and, as such, lateral spreading is unlikely. Additionally, Mitigation Measure IS-1, detailed above, would adequately reduce potential impacts related to liquefaction, including lateral spreading and surface manifestation, by ensuring the use of engineered foundation design techniques appropriate for areas potentially subject to liquefaction. Some seismically-induced settlement may be expected as a result of strong ground shaking, but due to the uniform nature of the underlying geologic materials and the long tectonic history and density of the bedrock, excessive dynamic or differential settlements are not expected. Furthermore, according to the Soils and Geology Report, Project construction would not cause or increase the potential for any seismic-related ground failure on-site or adjacent to the Project Site. Similarly, the Project Site is not located within a zone of known subsidence.

However, during Project construction, excavation to a maximum depth of 25 feet could create the potential for temporary unstable slopes. Any required excavations would be properly sloped or shored in accordance with Building Code requirements and the conditions contained within the City Department of Building and Safety's Geology and Soils Report Approval Letter for the Project, as it may be subsequently amended or modified. Nevertheless, the following mitigation measure will be implemented to ensure shoring activities do not cause any potential for on- or off-site landslides:

Mitigation Measure IS-2: Any proposed vertical excavations shall be stabilized with the aid of a temporary shoring system, which shall be designed by a qualified shoring engineer in accordance with the provisions of the applicable version of the California Building Code and City of Los Angeles Building Code, as well as relevant recommendations provided by the geotechnical engineer. During the Plan Check process, the City of Los Angeles Department of Building and Safety and the geotechnical engineer of record shall review the shoring design to verify it conforms to the applicable building codes and geotechnical recommendations.

The temporary shoring system shall consist of steel soldier piles placed in drilled holes and backfilled with concrete. Depending on the depth of the shoring walls, the soldier piles may be designed as cantilevered, laterally braced utilizing tie-back anchors, or internally braced. Lagging timber boards shall be installed between the soldier piles throughout the entire depth of the shored excavation to prevent caving or raveling of the exposed soils.

Alternatively, shoring systems may be designed based on the findings of a site-specific, design-level geologic and geotechnical investigation(s) approved by the City, including but not limited to the use of proven methods generally accepted by registered engineers to reduce the risk of seismic hazards to a less than significant level, provided such recommendations meet or exceed applicable regulatory requirements, including, but not limited to the version of the California Building Code, as adopted and amended by the City, in effect at the time of the City's approval of the geotechnical investigation(s); relevant state, County, and City laws, ordinances, and Code requirements; and current standards of practice designed to minimize potential geologic and geotechnical impacts. The Project also shall comply with the conditions contained within the City Department of Building and Safety's Geology and Soils Report Approval Letter for the Project, as it may be subsequently amended or modified.

With implementation of the mitigation measure identified above, the Project would not result in any on- or off-site landslide potential. Therefore, impacts related to unstable

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

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

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The on-site geologic materials include fill materials and alluvial soils to a depth of approximately 15 to 22 feet, which consist of a mixture of sand, silt, and gravel and which were found to be in the very low expansion range. These materials are underlaid by bedrock of the Fernando Formation, which consists of siltstone and claystone and was found to be in the moderate expansion range. With adherence to state and City building requirements, along with the design-level geotechnical report, impacts related to expansive soils would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is located within a community served by existing sewer infrastructure. The Project's wastewater flows would be accommodated via connections to the existing wastewater system. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems and would not result in impacts related to the ability of soils to support septic tanks or alternative wastewater disposal systems. Therefore, no impacts related to the use of septic tanks would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

VII. Greenhouse Gas Emissions

Would the project:

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

Potentially Significant Impact. Gases that trap heat in the atmosphere are called greenhouse gases (GHG), since they have effects that are analogous to the way in which a greenhouse retains heat. GHGs are emitted by both natural processes and human activities. The accumulation of GHGs in the atmosphere regulates earth's temperature. The State of California has undertaken initiatives designed to address the effects of GHG emissions and to establish targets and emission reduction strategies for GHG emissions in California. The Project's construction and operational activities would generate GHG

emissions. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts related to GHG emissions.

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

Potentially Significant Impact. As the Project has the potential to emit GHG emissions, further analysis of this topic in the EIR is required. The analysis will identify Project-related emissions and associated emission reduction strategies to determine whether the Project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG (e.g., Assembly Bill 32, Senate Bill 32, City of Los Angeles Green Building Code).

VIII. Hazards and Hazardous Materials

Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Potentially Significant Impact. The types and amount of hazardous materials potentially used in connection with the Project would be typical of those used for residential, office, and commercial uses. Specifically, operation of the office and commercial uses would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. The proposed residential uses would involve the limited use of household cleaning solvents and pesticides for landscaping. Project construction also would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. Therefore, further analysis of this issue in the EIR is recommended.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Potentially Significant Impact. The Project Site was historically developed with a gas station, and a number of underground storage tanks (USTs) were located on-site. The gas station was removed in the early 1980s, prior to current environmental regulations, and there is a lack of information regarding the handling, storage, and disposal practices with respect to its hazardous wastes. In addition, while several former on-site USTs have been removed and received closure notice, construction activities may disturb residual contamination during construction. Moreover, given the long history of the surrounding area and the numerous listings related to USTs, brownfields, and other databases

suggestive of potential environmental concerns, there is a potential for impacts to the Project Site from properties in the surrounding area. As such, further analysis in the EIR is required to determine the Project's potential impacts with respect to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

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

Less Than Significant Impact. There are no school sites located within a 0.25-mile radius of the Project Site. The nearest schools include Ramon C. Cortines School of Visual and Performing Arts (Grand Arts High School), located at 450 North Grand Avenue approximately 0.5 mile to the north, and USC Hybrid High School, located at 350 South Figueroa Street approximately 0.4 mile to the west. As discussed above in Response to Checklist Question VIII.a, Project construction would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. Additionally, Project operation would involve the limited use of hazardous materials typically used in the maintenance of residential, office, and commercial uses (e.g., cleaning solutions, solvents, pesticides for landscaping, painting supplies, and petroleum products). However, all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' specifications and in compliance with applicable federal, state, and local regulations. As such, the use of such materials would not create a significant hazard to nearby schools. Therefore, impacts related to hazards to nearby schools would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

Potentially Significant Impact. Specific addresses within the Project Site are listed on the Underground Storage Tank database (CA UST), the Statewide Environmental Evaluation and Planning System database (CA SWEEPS UST), the database of toxics and criteria pollutant emissions data collected by the California Air Resources Board (CA EMI), and on the Historic Cleaner database. In addition, a number of properties in the surrounding area are listed on various environmental databases. Therefore, further evaluation of this issue in an EIR is required.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or

public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The Project Site is not located within 2 miles of an airport or within an airport planning area. The nearest airport is the Los Angeles International Airport located approximately 10.5 miles southwest of the Project Site. Therefore, no impacts related to airport use would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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?

No Impact. The Project Site is not located within 2 miles of a private airstrip. The closest private airstrip is the Los Alamitos Army Airfield, approximately 21 miles southeast of the Project Site. Therefore, no impacts related to safety hazards associated with a private airstrip would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. While it is expected that Project construction would be confined on-site, the Project's construction activities may have the potential to cause temporary and intermittent lane closures on adjacent off-site streets (i.e., Broadway, 2nd Street, and/or Spring Street) due to the installation or upgrading of utility infrastructure. However, in the event of lane closure, the remaining travel lanes would be maintained in accordance with standard construction management plans that would ensure adequate circulation and emergency access. Furthermore, none of adjacent streets are designated disaster routes.[24]

Project operation would generate traffic in the Project vicinity but would not result in any changes to site access. The Project would comply with Los Angeles Fire Department (LAFD) access requirements and would not impede emergency access in the Project vicinity. Therefore, the Project would not cause an impediment along the City's designated disaster routes or impair implementation of any City emergency response plan. Impacts related to emergency response and evacuation plans would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

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?

No Impact. The Project Site is located within Fire District No. 1, where additional developmental regulations are established to address fire hazards.[25] Such regulations address roof coverings; the use of certain building materials that have a minimum fire-resistance-rated construction of 1 hour; and other provisions detailed in Los Angeles Building Code. However, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone, and there are no wildlands located adjacent to the Project Site.[26] Additionally, the Project's design and construction would comply with all applicable LAFD and Code requirements. Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. No impacts related to wildland fires would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

IX. Hydrology and Water Quality

The following analysis is based, in part, on the *Water Resources Technical Report* (Hydrology Report) prepared by Psomas, dated November 10, 2016, unless otherwise noted. This report is included in Appendix IS-3 of this Initial Study.

Would the project:

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

Less Than Significant Impact. During Project construction, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into the municipal storm drain system. In addition, on-site watering activities to reduce airborne dust, as well as possible dewatering activities, could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel also could occur. Thus, Project-related construction activities may have the potential to result in adverse effects on water quality. However, as Project construction would disturb more than one acre of soil, the Project would be required to obtain coverage under the NPDES Construction General Permit (Order No. 2012-0006-DWQ) pursuant to NPDES requirements. In accordance with the permit requirements, a SWPPP would be developed and implemented during Project

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[25] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org, accessed October 14, 2016.*

[26] *Id.*

construction. The SWPPP would outline BMPs and other erosion control measures to minimize the discharge of pollutants in storm water runoff. The SWPPP would be subject to review by the City for compliance with the City of Los Angeles' *Best Management Practices Handbook*, *Part A Construction Activities* and would be carried out in compliance with State Water Resources Control Board (SWRCB) requirements. Additionally, Project construction activities would comply with grading permit regulations (LAMC Chapter IX, Division 70), including the preparation of an erosion control plan to reduce the effects of sedimentation and erosion. Prior to the issuance of a grading permit, the Applicant would be required to provide the City with evidence that a Notice of Intent has been filed with the SWRCB to comply with the Construction General Permit. Furthermore, erosion control and drainage devices would be provided in accordance with the Construction General Permit and SWPPP, as well as the City's Municipal Separate Storm Sewer System (MS4) Permit. Any dewatering activities during construction would incorporate BMPs targeting sediment-specific pollutants (e.g., sediment treatment, sediment basins, sediment traps, etc.). Based on compliance with these regulatory requirements, impacts to water quality during construction would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

Project operation could introduce stormwater pollutants that are typical of residential and commercial developments (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with vehicular parking and circulation). Specific pollutants of concern identified in the Hydrology Report include sediment/turbidity, nutrients, trash and debris, oxygen demanding substances, bacteria and viruses, oil and grease, and pesticides; of these, sediment, trash, bacteria, and viruses also are pollutants of concern for Los Angeles River Reach 2, to which the Project Site is tributary. Stormwater runoff from precipitation events could potentially carry such urban pollutants into the municipal storm drain system and affect downstream water quality. However, in accordance with the NPDES Municipal Permit, the Project would implement Standard Urban Stormwater Mitigation Plan (SUSMP) requirements during its operational life to reduce the discharge of polluted runoff from the Project Site. The Project also would be required to comply with the City's Low Impact Development (LID) Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and stormwater reuse. To this end, BMPs would be implemented to collect, detain, and treat runoff on-site before discharging into the municipal storm drain system. Specifically, as detailed in the Project's Hydrology Report, a stormwater capture and use system (i.e., harvesting system) is proposed on-site. This system would include a harvesting cistern with a pre-treatment settlement device to filter out trash and debris before water is used to irrigate the landscaped areas of the Project Site. The harvesting cistern capacity would exceed that required for an 85th percentile rainfall event (per LID requirements), thus providing 100 percent treatment. In addition, the proposed change in land use from a surface parking lot to a mixed-use residential and commercial development would result in a reduction in the potential types of pollutants generated on-site. With implementation of

required BMPs, as described in the Project's Hydrology Report, impacts to water quality during operation would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. According to the California Geological Survey, the historic high groundwater level beneath the Project Site is approximately 30 feet below the ground surface.[27] Soil borings conducted on-site observed water seepage at depths ranging between 13.5 and 17 feet below ground surface; however, this seepage is assumed to represent a perched condition due to the underlying siltstone bedrock and does not represent the static groundwater table. Project construction would involve excavation to a maximum depth of 25 feet for the proposed subterranean level and foundation elements and is anticipated to encounter water seepage. Accordingly, as discussed in the Soils and Geology Report, temporary dewatering may be implemented to collect and pump any water encountered. As this seepage is not considered part of the groundwater table, Project construction would not deplete groundwater supplies or interfere with groundwater recharge.

Project operation likewise would not interfere with groundwater recharge. The Project Site is currently developed and exhibits approximately 81 percent imperviousness. Following Project implementation, approximately 80 percent of the site would consist of impervious surfaces, with the remainder consisting of natural and landscaped areas. These natural areas would continue to allow infiltration during rainfall events, as under existing conditions. As such, Project construction and operation would not affect groundwater levels beneath the Project Site, nor would they deplete groundwater supplies or result in a substantial net deficit in the aquifer volume or lowering of the local groundwater table. Therefore, less than significant impacts on groundwater would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a

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[27] *Geotechnologies, Inc., Soils and Geology Report to Support the Environmental Impact Report, August 16, 2016 and revised November 3, 2016; see Appendix IS-2 of this Initial Study.*

manner which would result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. The Project Site does not include any water courses or rivers. The Project Site is currently developed and exhibits approximately 81 percent imperviousness. The Project Site is relatively flat, descending gently to the southeast with an elevation relief of four feet.[28] Under existing conditions, stormwater runoff from the site sheet flows to the adjacent streets and enters catch basins that connect to the municipal storm drain system.

As discussed above, following Project implementation, approximately 80 percent of the site would consist of impervious surfaces, with the remainder consisting of natural and landscaped areas. These natural areas would continue to allow infiltration during rainfall events, as under existing conditions. Further, permeable pavement would be used in certain hardscape areas to reduce stormwater runoff volumes. Additionally, the site's existing drainage patterns would be maintained. The Project would include the installation of catch basins, planter drains, and roof downspouts throughout the Project Site to collect site and roof runoff and direct stormwater away from the structures through a series of underground storm drain pipes. This on-site stormwater conveyance system would prevent on-site flooding and nuisance water within the Project Site. In addition, as detailed in the Project's Hydrology Report, a proposed stormwater capture and use system (i.e., harvesting system) would be introduced to irrigate the landscaped areas of the Project Site. This system's harvesting cistern would have high flow outlets that route to the same discharge points as under existing conditions. Overall, a net reduction in stormwater flow rates would occur with implementation of LID features, as shown in Table B-1 on page B-29. As such, the Project would not have an adverse effect on the capacity of the municipal storm drain system.

As also previously discussed, the Project would be required to have an erosion control plan approved by LADBS, as well as a SWPPP pursuant to NPDES permit requirements. As part of the SWPPP, BMPs would be implemented during construction to reduce sedimentation and erosion levels to the maximum extent possible. In addition, Project construction contractors would be required to comply with City grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion.

Based on the above, Project construction and operation would not substantially alter the existing drainage patterns on-site or in surrounding area such that substantial erosion

[28] *Ibid.*

Table B-1
Existing and Proposed Peak Runoff Flows

Storm Event	Existing Q_{Total} (cfs)	Proposed Q_{Total}[a] (cfs)	Percent Reduction
5-Year	1.13	0.95	16.0%
10-Year	1.50	1.32	12.0%
25-Year	1.98	1.79	9.6%
50-Year	2.42	2.24	7.4%
100-Year	2.84	2.65	6.7%

cfs = cubic feet per second

Q = Peak Flow

[a] *Includes reduction from LID implementation (subtracting the 85th Percentile storm flow).*

Source: Psomas, 2016.

or siltation would occur. Impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. See Response to Checklist Question IX.c, above. Based on that discussion, Project construction and operation would not substantially alter the existing drainage patterns on-site or in surrounding area such that substantial on- or off-site flooding would occur. Impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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?

Less Than Significant Impact. See Response to Checklist Questions IX.a and IX.c, above. Impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

f. Otherwise substantially degrade water quality?

Less Than Significant Impact. See Response to Checklist Question IX.a, above. Impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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?

No Impact. The Project Site is not located within a 100-year or 500-year floodplain as mapped by the Federal Emergency Management Agency (FEMA) or the City of Los Angeles, nor is it located within a potential inundation area as designated in the General Plan Safety Element.[29,30] Thus, the Project would not place housing within a 100-year floodplain. Therefore, no impacts related to flooding would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

h. Place within a 100-year flood plain structures which would impede or redirect flood flows?

No Impact. See Response to Checklist Question IX.g, above. No impact would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

No Impact. As discussed above, the Project Site is not located within a designated 100-year floodplain, nor is it located within a flood control basin or a potential inundation area as designated in the General Plan Safety Element.[31] Accordingly, no impacts related to flooding as a result of a levee or dam failure would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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[29] *According to FEMA, the Project Site is located in Zone X, Area of Minimal Flood Hazard.*

[30] *Los Angeles General Plan Safety Element, Exhibit F, 100-Year & 500-Year Flood Plain, p. 57, and Exhibit G, Inundation & Tsunami Hazard Areas, November 1996, p. 59.*

[31] *Los Angeles General Plan Safety Element, Exhibit F, 100-Year & 500-Year Flood Plain, p. 57, and Exhibit G, Inundation & Tsunami Hazard Areas, November 1996, p. 59.*

j. Inundation by seiche, tsunami, or mudflow?

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement associated with large, shallow earthquakes. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity.

There are no water bodies located on-site. The Project Site is approximately 14 miles east of the Pacific Ocean and thus it is not located in an area potentially impacted by a tsunami.[32] In addition, the Project Site is not located downslope from an area of potential mudflow. The nearest enclosed bodies of water are Echo Park Lake, located approximately 1.5 miles to the northwest, and MacArthur Park Lake, located approximately 1.8 miles to the west.[33] Given the distance, no seiche, tsunami, or mudflow events are expected to impact the Project Site. No impacts related to inundation by seiche, tsunami, or mudflow would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

X. Land Use and Planning

Would the project:

a. Physically divide an established community?

Less Than Significant Impact. The Project Site is located in a highly urbanized area. Surrounding uses in the Project vicinity include a mix of commercial office, government and civic office, retail, and residential uses contained in a range of low-rise to high-rise buildings, which are physically separated from the Project Site by modified Avenues (as defined in the City's General Plan Mobility Plan 2035). Immediately to the west is an existing surface parking lot and 10-story office building fronting Broadway. To the immediate north across 2nd Street is Los Angeles Times Square, which includes an 11-story office building and a six-level parking structure fronting 2nd Street. East of the Project Site across Spring Street are single-story commercial buildings and a six-level

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[32] *Ibid.*

[33] *Additionally, the currently drained Silver Lake Reservoir is located approximately three miles northwest of the Project Site; plans are underway to refill it in Spring 2017. It is a concrete-lined, off-stream reservoir, which is not held by a dam. Similarly, a water quality improvement project is underway at the currently drained Elysian Reservoir, located approximately two miles to the northeast; it is anticipated to become operational again in late 2017.*

parking structure. To the south is a surface parking lot and six-story apartment building (Hosfield Building) fronting Broadway, as well as a surface parking lot and five-story apartment building (Douglas Building Lofts) fronting Spring Street. The majority of the Central City community consists of commercial and industrial uses, with smaller pockets of open space and public facilities and an increasing number of multi-family residential buildings.

Currently, the Project Site is being used as a construction staging area for the Metro Regional Connector project. The Project would replace Metro's temporary construction staging area (in a portion of the site previously developed as a surface parking lot) with a 30-story mixed-use building consisting of 107 residential units, approximately 7,200 square feet of ground level commercial floor area, and 534,044 square feet of office uses. The Project Site would contain Metro's 2nd Street/Broadway rail station (below grade) and station portal (at grade) in the northwest corner of the site, both of which are currently under construction but are not a part of the Project.[34] In addition, the existing five-story parking structure located on the southern portion of the Project Site would remain and provide vehicle and long-term bicycle parking for the Project. The proposed uses are consistent with the types of land uses already present or proposed in the surrounding area. As development of the Project would occur entirely within the Project Site boundaries, the Project would not physically divide, disrupt, or isolate an established community. Rather, implementation of the Project would result in further infill of an already developed community with similar and compatible land uses. Impacts related to the physical division of an established community would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

b. Conflict with 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?

Potentially Significant Impact. As discussed in Attachment A, Project Description, the Project requests several discretionary approvals, including: a Vesting Zone Change to amend Ordinance No. 180,871 to eliminate or modify [Q] Condition No. 7 (regarding 30-percent minimum and 40-percent maximum lot coverage for the portion of buildings over 150 feet in height) to reflect the Project's proposed design (per LAMC Sections 12.32 G and 12.32 Q); Site Plan Review for a project with an increase of 50,000 square feet of

[34] *The environmental impacts of Metro's Regional Connector Transit Project, including construction and operation of the 2nd Street/Broadway station, were evaluated in the Regional Connector Transit Corridor EIS/EIR (SCH No. 2009031043), certified by Metro in 2012 in conjunction with approval of that project.*

non-residential floor area and 50 or more dwelling units (per LAMC Section 16.05); Design Overlay Plan Approval for a project in the Broadway CDO Zone (per LAMC Section 13.08 E); Vesting Tentative Tract Map No. 74320 for a 10-lot airspace subdivision for merger, resubdivision, and condominium purposes, with a request for haul route approval (per LAMC Section 17.01); and other discretionary and ministerial permits and approvals that may be deemed necessary. Accordingly, further analysis of this topic in the EIR is required to determine the Project's consistency with the LAMC and other applicable land use plans, policies, and regulations.

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

No Impact. The Project Site is located in an urbanized area and includes a five-story parking structure and a temporary construction staging area in a portion of the site previously developed as a surface parking lot. The Project Site includes limited ornamental landscaping in the form of a narrow landscaped parkway and several street trees. As such, the Project Site does not support any important habitat or natural communities. Additionally, as noted above in Response to Checklist Question IV.f, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan. No impacts related to any conservation plans would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

XI. Mineral Resources

Would the project:

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

No Impact. With respect to aggregate resources (i.e., sand, gravel, and crushed stone), which are used in cement, asphalt, and other building materials, the Project Site is located within the San Fernando Valley Production—Consumption region.[35] However, based on the Project Site's commercial land use and zoning designations, the City has determined there are no plans to utilize the site for long-term mineral extraction. As

[35] *State of California Department of Conservation, California Geological Survey, Generalized Mineral Land Classification Map of Los Angeles County—South Half, dated 1994, ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Plate1B.pdf, accessed October 14, 2016.*

previously indicated, the Project Site is located within an urbanized area and has been previously disturbed by development. No mineral extraction operations currently occur on-site. Furthermore, the Project Site is not located within Mineral Resource Zone (MRZ) 2, which designates areas where significant mineral deposits are present or likely, but rather is located within MRZ-3, where mineral deposits may occur but whose significance cannot be evaluated from available data.[36,37] As such, the potential for important mineral resources to occur on-site is low. Additionally, the Project Site is not located within an oil field or oil drilling area, nor are oil wells located on-site.[38,39] Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impacts related to mineral resources would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

No Impact. See Response to Checklist Question XI.a, above. No impact would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

XII. Noise

Would the project result in:

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?

Potentially Significant Impact. The Project Site is located within an urbanized area that contains various sources of noise. The predominant noise source in the immediate Project area is associated with traffic along local roadways. Existing on-site

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

[37] *State of California Department of Conservation, California Geological Survey, Generalized Mineral Land Classification Map of Los Angeles County—South Half, dated 1994, ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Plate1B.pdf, accessed October 14, 2016.*

[38] *Los Angeles General Plan Safety Element, Exhibit E, Oil Field & Oil Drilling Areas, November 1996, p. 55.*

[39] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org, accessed October 14, 2016.*

noise sources include construction activities associated with Metro's rail station and portal, as well as vehicle noise associated with operation of the on-site parking structure. During Project construction, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. Additionally, the Project's commercial and residential uses would generate noise from the operation of mechanical equipment, the loading area, and use of the ground level paseo and various amenity decks and terraces. Further, traffic attributable to the Project has the potential to increase noise levels along adjacent roadways, which may result in the exposure of persons to or generation of noise in level in excess of established standards. Therefore, further analysis of this topic in the EIR is required to determine the Project's noise impacts during construction and operation.

b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Project construction could generate groundborne noise and vibration in association with demolition, site grading and clearing activities, the installation of building footings, and construction truck travel. As such, the Project has the potential to generate and expose people to excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further analysis of this topic in the EIR is required to determine the Project's groundborne vibration and noise levels.

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

Potentially Significant Impact. As discussed above in Response to Checklist Question XII.a, Project-related traffic and operation of the residential and commercial uses have the potential to increase ambient noise levels above existing levels. Therefore, further analysis of this topic in the EIR is required.

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

Potentially Significant Impact. As discussed above in Response to Checklist Questions XII.a and XII.b, Project construction activities have the potential to temporarily or periodically increase ambient noise levels above existing levels. Therefore, further analysis of this topic in the EIR is required to determine the Project's noise impacts.

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

No Impact. The Project Site is not located within 2 miles of an airport or within an area subject to an airport land use plan. The nearest airport is the Los Angeles International Airport located approximately 10.5 miles southwest of the Project Site. Therefore, no impacts related to airport noise would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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. The Project Site is not located within the vicinity of a private airstrip. There are no private airstrips within the Central City community. The closest private airstrip is the Los Alamitos Army Airfield, which is approximately 21 miles southeast of the Project Site. Therefore, no noise impacts related to a private airstrip would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

XIII. Population and Housing

Would the project:

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

Potentially Significant Impact. The Project involves the construction of 107 new residential units. As such, the Project would increase the residential population in the Central City community. Additionally, the Project would generate permanent office and commercial jobs on-site, as well as temporary construction-related jobs. Therefore, further analysis in an EIR is required to determine the Project's impacts with respect to population, housing, and employment growth.

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

No Impact. As no housing currently exists on the Project Site, the Project would not displace any existing housing. Therefore, no impacts related to housing displacement would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

No Impact. As no housing currently exists on the Project Site, the development of the Project would not cause the displacement of any persons or require the construction of housing elsewhere. Therefore, no impacts related to population displacement would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

XIV. Public Services

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

a. Fire protection?

Potentially Significant Impact. As discussed above, the Project would increase both the residential and daytime populations in the Central City community through the construction of new residential, office, and commercial uses. Thus, the Project has the potential to result in an increased demand for fire protection services. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on fire protection services provided by LAFD.

b. Police protection?

Potentially Significant Impact. The residential population generated by the Project may result in an increased demand for police protection services provided by the Los Angeles Police Department (LAPD). Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on police protection services provided by LAPD.

c. Schools?

Potentially Significant Impact. The residential population generated by the Project may result in an increased demand for Los Angeles Unified School District (LAUSD) school facilities. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on school services and facilities provided by LAUSD.

d. Parks?

Potentially Significant Impact. The residential population generated by the Project may result in additional demand for parks and recreational services provided by the Los Angeles Department of Recreation and Parks (LADRP). Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on parks and recreational facilities provided by LADRP.

e. Other governmental services (including roads)?

Potentially Significant Impact. The residential population generated by the Project may result in additional demand for library services provided by the Los Angeles Public Library (LAPL). Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on library services provided by LAPL.

With respect to roadway maintenance, the Project would not generate substantial truck traffic or unusual circumstances necessitating maintenance beyond regularly scheduled services. No other public services would be notably impacted by the Project. Therefore, the Project would have less than significant impacts on other governmental services, including roadways, and no mitigation measures would be required. No further analysis of other governmental services in the EIR is required.

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?

Potentially Significant Impact. As discussed above in Response Checklist Question XIV.d, the new residential population associated with the Project could result in an increased demand for public parks and recreational facilities that serve the Project Site. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on parks and recreational facilities provided by LADRP.

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

Potentially Significant Impact. The Project includes several amenity decks offering a variety of social and community spaces, including landscaped terraces, rooftop gardens, gathering spaces including barbeque and outdoor dining areas, and a swimming pool. Indoor recreational spaces would include a fitness center, two common rooms, and a

lounge. Private balconies also would be provided on various levels for both residences and some of the office uses. A total of 27,765 square feet of useable common open space and 800 square feet of useable private open space would be provided for Project residents. The potential environmental impacts associated with construction of these facilities are analyzed throughout this Initial Study and will be further analyzed in the EIR for those topics where impacts could be potentially significant as part of the overall Project.

XVI. Transportation/Circulation

Would the project:

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

Potentially Significant Impact. The Project has the potential to result in an increase in daily and peak hour traffic within the Project vicinity. In addition, Project construction has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. Once construction is completed, the Project's residents, employees, and visitors would generate daily vehicle, pedestrian, bicycle, and public transit trips. The resulting increase in the use of the area's transportation facilities could exceed roadway and transit system capacities. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on the roadway and transit system. In addition, Project compliance with the City's General Plan Mobility Plan 2035 standards will be discussed further in the EIR. Furthermore, although not required under CEQA, the EIR will include an analysis of the adequacy of on-site parking.

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

Potentially Significant Impact. Metro administers the Congestion Management Program (CMP), a state-mandated program designed to address the impacts urban congestion has on local communities and the region as a whole. The CMP provides an analytical basis for the transportation decisions contained in the State Transportation Improvement Project. The CMP for Los Angeles County requires an analysis of any

Project that could add 50 or more trips to any CMP intersection or 150 or more trips to a CMP mainline freeway location in either direction during either the A.M. or P.M. weekday peak hours. Project implementation has the potential to generate additional vehicle trips, which could potentially add more than 50 trips to a CMP roadway intersection or more than 150 trips to a CMP freeway segment. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on CMP facilities.

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

Less Than Significant Impact. As previously discussed, the Project Site is not located in the vicinity of any public or private airport or planning boundary of any airport land use plan. The nearest airport is the Los Angeles International Airport located approximately 10.5 miles southwest of the Project Site. However, the proposed mixed-use building would extend more than 200 feet above existing grade. In accordance with Code of Federal Regulations Title 14, Section 77.13, the Applicant would be required to submit copies of Federal Aviation Administration (FAA) Form 7460-1 to the FAA Obstruction Evaluation Service (OES). The OES would then evaluate the Project, and any OES recommendations would be incorporated into the building's design, including protocols pertaining to building markings and lighting. Implementation of required design features and lighting would ensure that impacts associated with air traffic safety would be less than significant. No mitigation measures or further analysis of this topic in an EIR is required.

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

No Impact. The roadways adjacent to the Project Site are part of the local roadway network and contain no sharp curves or dangerous intersections. The Project does not include any proposed modifications to the street system or any dangerous design features. In addition, the Project would not result in incompatible uses, as the proposed uses are consistent with other commercial and residential uses in the Project vicinity. Thus, no impacts related to increased hazards due to a design feature or incompatible use would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

e. Result in inadequate emergency access?

Potentially Significant Impact. While it is expected that Project construction would be confined on-site, the Project's construction activities may have the potential to cause temporary and intermittent lane closures on adjacent off-site streets (i.e., Broadway, 2nd Street, and/or Spring Street) due to the installation or upgrading of utility infrastructure.

The Project also would generate construction traffic, particularly haul trucks, which may affect the capacity of adjacent streets and nearby freeways. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on emergency access.

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

Potentially Significant Impact. There are multiple public transportation opportunities in the immediate Project vicinity. The Project Site is located approximately 700 feet from the Civic Center/Grand Park Metro Purple and Red Line station (located at the southwest corner of 1st Street and Hill Street), and, as previously mentioned, a Metro Regional Connector portal and station are currently under construction on-site. The site is also served by Metro Bus Lines 2, 4, 30, 33, 35, 40, 45, 68, 83, 84, 92, 302, 330, 728, 733, 745, and Los Angeles Department of Transportation (LADOT) Dash Line D. Additionally, the Project would include short-term and long-term bicycle parking, as required. As Project operation has the potential to increase the demand for alternative transportation, further analysis in the EIR is required to determine the Project's potential to conflict with adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities.

XVII. Tribal Cultural Resources

Would the project:

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

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

provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As previously discussed, the Project would require grading, excavation to a maximum depth of 25 feet, including in areas of the Project Site where Metro is not excavating as part of its construction of the 2ndStreet/Broadway rail station and portal, and other construction activities that could have the potential to disturb existing but undiscovered tribal cultural resources. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will notify all applicable tribes, and the Project Applicant will participate in requested consultations. Further analysis of this topic in the EIR is required to determine the Project's potential impacts to tribal cultural resources.

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Potentially Significant Impact. See Response to Checklist Question XVII.a.i, above. This issue will be evaluated further in the EIR.

XVIII. Utilities

Would the project:

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

Potentially Significant Impact. The Los Angeles Regional Water Quality Control Board's (LARWQCB) Water Quality Control Plan for the Los Angeles Region (Basin Plan) establishes guidelines for all municipalities and other entities that use water and/or discharge into the Santa Monica Bay.[40] Wastewater reclamation and treatment in the City

[40] *Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, California Regional Water Quality Control Board Los Angeles Region (4) (adopted June 1994, amended December 2010).*

is provided by the LADPW Bureau of Sanitation, which operates two treatment plants and two water reclamation plants in accordance with LARWQCB treatment requirements and/or the Basin Plan's water reclamation requirements. The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which is designed to provide secondary treatment for 450 million gallons per day (mgd), with annual increases in wastewater flows limited to 5 mgd by City Ordinance No. 166,060. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LARWQCB's discharge policies for Santa Monica Bay.

These proposed uses are anticipated to increase wastewater generation on-site, which would result in an increased demand for wastewater treatment facilities. Therefore, further analysis of this issue in an EIR is required to determine whether Project development would cause the HTP's wastewater treatment requirements to be exceeded.

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

Potentially Significant Impact. Water and wastewater systems consist of two components, the source of the water supply or place of sewage treatment and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site. Project development would result in increased water demand and wastewater generation on-site and may necessitate upgrades to water and wastewater conveyance systems. As such, further analysis of this issue in an EIR is required to determine whether adequate capacity is available to accommodate the domestic water demand, required fire flows, and wastewater flows generated by the Project.

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?

Less Than Significant Impact. As discussed in Response to Checklist Question IX.c, stormwater flows from the Project Site would not increase with implementation of the Project. As discussed above in Response to Checklist Question IX.a, the Project would be required to comply with the City's LID Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. To this end, BMPs would be implemented to collect, retain, and treat runoff on-site before discharging into the municipal storm drain system, and as a result, stormwater flows from the site would be reduced as compared to existing conditions. Accordingly, the Project would not require the construction of new off-site stormwater drainage facilities or

expansion of existing facilities. Impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

Potentially Significant Impact. The Los Angeles Department of Water and Power (LADWP) supplies water to the Project Site. As previously discussed, Project development would result in increased water demand. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on the water supply.

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?

Potentially Significant Impact. See Response to Checklist Question XVIII.a, above. This issue will be evaluated further in the EIR.

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

Potentially Significant Impact. Solid waste generated by the Project would result in an increased demand for landfill capacity compared to existing conditions. More specifically, the Project's proposed residential and commercial uses would generate solid waste on an ongoing basis, and construction activities would generate one-time construction waste that would need to be disposed. As such, further analysis of this topic in the EIR is recommended.

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

Less Than Significant Impact. It is expected that Project development would comply with federal, state, and local statutes and regulations related to solid waste. Resulting impacts would likely be less than significant. Nonetheless, because the EIR will study the Project's solid waste disposal needs, the EIR also will include an evaluation of the Project's compliance with statutes and regulations related to solid waste.

h. Other utilities and service systems?

Potentially Significant Impact. The Project would generate an increased demand for electricity and natural gas. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts related to energy use.

XIX. 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?

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project has the potential to result in significant impacts with regard to the following issues: Air Quality; Cultural Resources (Historic, Archeological, Paleontological and Tribal Cultural Resources); Greenhouse Gas Emissions/Sustainability; Hazards and Hazardous Materials; Land Use and Planning; Noise; Population, Housing, and Employment; Public Services (Fire Protection, Police Protection, Schools, Parks and Recreation, and Libraries); Transportation/Circulation; and Utilities (Water Supply, Wastewater, Solid Waste, and Energy). As such, the Project has the potential to degrade the quality of the environment. An EIR will be prepared to analyze and document these potentially significant impacts, and feasible mitigation measures will be recommended to reduce any identified significant impacts. As discussed above in the Responses to Checklist Questions IV.a through f, the Project would not substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal.

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).

Potentially Significant Impact. The potential for cumulative impacts occurs when the independent impacts of the Project are combined with impacts from other development projects to result in impacts that are greater than the impacts of the Project alone. Located within the Project vicinity are other current and reasonably foreseeable projects whose development, in conjunction with that of the Project, may contribute to

potential cumulative impacts. Project impacts on both an individual and cumulative basis will be addressed in the EIR for the following issues: Aesthetics (Aesthetics, Views, Light/Glare, and Shading); Air Quality; Cultural Resources (Historic, Archeological, Paleontological and Tribal Cultural Resources); Greenhouse Gas Emissions/Sustainability; Hazards and Hazardous Materials; Land Use and Planning; Noise; Population, Housing, and Employment; Public Services (Police Protection, Fire Protection, Schools, Parks and Recreation, and Libraries); Transportation/Circulation; and Utilities (Water Supply, Wastewater, Solid Waste, and Energy).

With respect to cumulative effects related to agricultural and forest resources and mineral resources, the Project would have no impact to these resources and, therefore, would not combine with other projects to result in cumulative impacts. With regard to biological resources, geology and soils, hydrology and water quality, and solid waste, the Project would not combine with related projects or other cumulative growth to result in significant cumulative impacts, as discussed further below.

As it relates specifically to biological resources, the Project Site is located in an urbanized area and, similar to the Project, other developments occurring in the Project vicinity would occur on previously disturbed land. The Project Site does not contain any sensitive biological resources, and there are no native or protected trees located on-site or within the street parkway. Like the Project, related projects involving tree removals would be required to comply with the MBTA, which regulates vegetation removal during the nesting season to ensure significant impacts to migratory birds do not occur. As such, the Project would not contribute to a cumulative effect.

Due to the site-specific nature of geological conditions (e.g., soils, geological features, seismic features, etc), geology impacts are typically assessed on a project-by-project basis, rather than on a cumulative basis. None of the Project Site's physical characteristics are unique or more likely to involve or induce geologic or geotechnical impacts than other physical features throughout the surrounding area. Nonetheless, cumulative growth would cumulatively expose a greater number people to seismic hazards. However, like the Project Applicant, the proponents of related projects and all other future development projects in the area would be required to comply with applicable local, regional, state, and federal regulations pertaining to geology and soils, including the California and Los Angeles Building Codes. As these regulatory requirements are intended to minimize risks associated with seismic and geotechnical hazards, with compliance, cumulative impacts with respect to geology and soils would be less than significant.

With respect to hydrology and water quality, related projects would be required to conduct site-specific technical analysis and mitigation, as necessary, in addition to compliance with regulatory requirements and the City's standard mitigation practices during

construction. Similar to the Project, related projects that disturb more than one acre of soil would be required to obtain coverage under the NPDES Construction General Permit (Order No. 99-08-DWQ) and implement a SWPPP pursuant to NPDES requirements. Additionally, SUSMP requirements would be met during the operational life of relevant developments to reduce the discharge of polluted runoff, in addition to compliance with the City's LID Ordinance. Furthermore, as previously discussed, as a result of LID compliance stormwater flows from the Project Site would be reduced as compared to existing conditions, and water quality would not be degraded. Accordingly, the Project would not contribute to cumulative impacts related to hydrology and water quality.

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

Potentially Significant Impact. As indicated by the analysis above, the Project could result in potentially significant impacts with regard to the following issues: Air Quality; Cultural Resources (Historic, Archeological, Paleontological and Tribal Cultural Resources); Greenhouse Gas Emissions/Sustainability; Hazards and Hazardous Materials; Land Use and Planning; Noise; Population, Housing, and Employment; Public Services (Police Protection, Fire Protection, Schools, Parks and Recreation, and Libraries); Transportation/Circulation; and Utilities (Water Supply, Wastewater, Solid Waste, and Energy). As a result, these potential effects will be analyzed further in the EIR.

Appendices

Appendix IS-1

Tree Inventory Report

June 10, 2016
Revised September 9, 2016

Carl Cade
Tribune Real Estate Holdings, LLC
202 West First Street
Los Angeles, California 90012

VIA E-MAIL
ccade@tribunemedia.com

Subject: Tree Inventory Report for the Tribune – South Parcel Project Site at 213 South Spring Street in the City of Los Angeles, California

Dear Mr. Cade:

Psomas is pleased to provide this Tree Inventory Report for the Tribune – South Parcel Project Site located at 213 South *Spring* Street in the City of Los Angeles. This property (hereinafter referred to as the "project site") is bordered by South Broadway to the northwest, West 2nd Street to the northeast, South Spring Street to the southeast, and a parking lot to the southwest (Exhibit 1).

Psomas Certified Arborist Trevor Bristle (International Society of Arboriculture Certificate No. WE-10233A) visited the project site on May 20, 2016, to document the type, quantity, and condition of trees that exist at the proposed project. Each tree was individually numbered and the trunk, branches, and foliage were carefully examined. During the site visit, the following data were recorded: tree species, number of trunks, trunk diameter at breast height (dbh), tree height, canopy diameter, and qualitative assessment ratings on aesthetics and health.

PROJECT DESCRIPTION

The project site is currently occupied by a multi-level parking structure and an adjacent parking area. The project proposes to retain the existing structure and develop the parking lot by constructing a 30-story, mixed-use development that will include 103 residential apartment units; office and commercial space; and a future regional rail connector station to be constructed by the Los Angeles County Metropolitan Transportation Authority (Metro).

REGULATORY AUTHORITY

As a condition of tentative tract map submittals, the City of Los Angeles (City) requires the submittal of a report that identifies the location of the following:

1. Trees that are designated as "protected trees" as defined by Section 17.02 of the Los Angeles Municipal Code (City of Los Angeles 2015). This category includes oak trees (*Quercus* spp.) that are indigenous to California, southern California black walnut trees (*Juglans californica*), western sycamore trees (*Platanus racemosa*), and California bay laurel trees (*Umbellularia californica*) that have a trunk dbh at least four inches.

2. Any non-protected trees that have a trunk dbh of at least eight inches (City of Los Angeles 2008).

225 South Lake Avenue
Suite 1000
Pasadena, CA 91101

Tel 626.351.2000
Fax 626.351.2030
www.Psomas.com

RESULTS

The proposed construction limits contain a total of 19 trees that meet the City's minimum size threshold for regulation as non-protected trees (i.e., trees with a trunk dbh greater than 8 inches). These trees include 13 Canary Island pines (*Pinus canariensis*), 5 sweetgums (*Liquidambar styraciflua*), and 1 tree-of-heaven (*Ailanthus altissima*). Additionally, a total of 12 palms[1] occur within the project construction limits that also meet the City's minimum size threshold for regulation. On-site palm trees include three king palms (*Archontophoenix alexandrae*) and nine Mexican fan palms (*Washingtonia robusta*). All of these palms are proposed for removal.

Street trees growing along South Broadway and South Spring Street are included in this report in the event that project implementation impacts these trees. These street trees include two fern pines (*Podocarpus gracilior*), one Indian laurel fig (*Ficus microcarpa*), and three southern live oaks (*Quercus virginiana*). None of the trees included in this report meet the definition of a "protected tree" as defined in the City's Municipal Code, though all are at least eight inches dbh. The southern live oaks mentioned above are not protected by the City's tree ordinance as this species is not indigenous to California. The Indian laurel fig will be removed by Metro for construction of a regional rail connector station prior to the initiation of construction activities for the project described above.

The condition of the trees included in this survey is described below, and collected data are summarized in Table 1. Tree locations are provided in Exhibit 2 and representative photographs of the trees are provided in Exhibits 3a and 3b.

TABLE 1
TREE DATA SUMMARY

Tree Number	Tree Species	dbh (in)	Tree Height (ft)	Canopy Width (ft)	Health Rating*	Aesthetic Rating*	Street Tree
1	Canary Island pine *Pinus canariensis*	17.8	45	15	3	3	
2	Canary Island pine *Pinus canariensis*	16.8	45	15	3	3	
3	Canary Island pine *Pinus canariensis*	15.1	40	12	3	3	
4	Canary Island pine *Pinus canariensis*	16.5	45	12	3	3	
5	Canary Island pine *Pinus canariensis*	18.5	55	25	4	3	
6	Canary Island pine *Pinus canariensis*	21.5	55	30	4	3	
7	Canary Island pine *Pinus canariensis*	13.0	55	15	3	3	
8	Canary Island pine *Pinus canariensis*	22.4	45	30	3	3	
9	Canary Island pine *Pinus canariensis*	14.3	50	20	3	3	

[1] Palms are often not considered trees because they lack a vascular cambium, which causes tree trunk diameters to expand over time. The age of palms is better correlated with tree height rather than trunk diameter. As a result, palms are discussed separately from traditional tree species in this report. Palms are not specifically discussed in City requirements.

TABLE 1
TREE DATA SUMMARY

Tree Number	Tree Species	dbh (in)	Tree Height (ft)	Canopy Width (ft)	Health Rating*	Aesthetic Rating*	Street Tree
10	Canary Island pine *Pinus canariensis*	23.0	50	20	3	3	
11	Canary Island pine *Pinus canariensis*	22.5	55	15	4	3	
12	Canary Island pine *Pinus canariensis*	20.3	55	12	4	3	
13	Canary Island pine *Pinus canariensis*	17.9	55	12	3	3	
14	fern pine *Podocarpus gracilior*	20.7	35	22	4	3	X
15	fern pine *Podocarpus gracilior*	18.4	30	12	4	4	X
16**	Indian laurel fig *Ficus microcarpa*	29.9	40	45	4	3	X
17	sweetgum *Liquidambar styraciflua*	10.3	40	30	4	3	
18	sweetgum *Liquidambar styraciflua*	10.2	45	20	4	4	
19	sweetgum *Liquidambar styraciflua*	8.4	35	18	4	3	
20	sweetgum *Liquidambar styraciflua*	9.3	35	15	3	3	
21	sweetgum *Liquidambar styraciflua*	8.6	30	20	4	3	
22	tree of heaven *Ailanthus altissima*	10.8	35	25	4	3	
23	southern live oak *Quercus virginiana*	13.4	25	20	3	3	X
24	southern live oak *Quercus virginiana*	10.3	25	18	3	3	X
25	southern live oak *Quercus virginiana*	13.3	15	15	3	3	X
26	king palm *Archontophoenix alexandrae*	16.8	30	18	3	3	
27	king palm *Archontophoenix alexandrae*	18.1	35	20	3	3	
28	king palm *Archontophoenix alexandrae*	10.3	25	12	4	3	
29	Mexican fan palm *Washingtonia robusta*	11.7	40	12	4	3	
30	Mexican fan palm *Washingtonia robusta*	13.0	50	10	3	3	
31	Mexican fan palm *Washingtonia robusta*	14.0	50	10	3	3	
32	Mexican fan palm *Washingtonia robusta*	13.2	45	12	3	3	

TABLE 1
TREE DATA SUMMARY

Tree Number	Tree Species	dbh (in)	Tree Height (ft)	Canopy Width (ft)	Health Rating*	Aesthetic Rating*	Street Tree
33	Mexican fan palm *Washingtonia robusta*	12.0	50	10	3	3	
34	Mexican fan palm *Washingtonia robusta*	15.7	35	12	4	3	
35	Mexican fan palm *Washingtonia robusta*	13.7	50	10	3	3	
36	Mexican fan palm *Washingtonia robusta*	11.6	45	10	3	3	
37	Mexican fan palm *Washingtonia robusta*	11.7	50	10	3	3	
dbh: diameter at breast height; in: inches; ft: feet.* Tree health and aesthetic quality were graded on a scale of 5 (excellent) to 1 (poor). ** Please note that Tree 16 was present at the time of the survey but will be removed by Metro prior to the initiation of the project described in this report.							

DISCUSSION

The following is a detailed summary of the trees included in this report:

- Trees 1 to 13 are Canary Island pines that are growing within fenced areas along the northwest, northeast, and southeast edges of the parking structure. These trees range from 13.0 to 23.0 inches dbh and from 40 to 55 feet in height. These trees appear to be in fair health with evidence of routine pruning. Trees 6 through 9 have exposed roots, likely the result of excessive irrigation and/or soil compaction due to foot traffic.
- Trees 14 and 15 are fern pines growing along South Broadway to the northwest of the project site. These trees are 20.7 and 18.4 inches dbh and 35 and 30 feet tall, respectively. These trees appear to be in good health with evidence of routine pruning. Moderate sidewalk damage consisting of lifted and cracked pavement is present at the base of both trees. The areas provided for the trees' root growth appear to be insufficient for their long-term health.
- Tree 16 is an Indian laurel fig growing along South Broadway to the northwest of the project site. This tree is 29.9 inches dbh and 40 feet tall. The tree appears to be in good health and has caused moderate sidewalk damage consisting of cracked pavement and root overgrowth. The area provided for the tree's root growth appears to be insufficient for its long-term health. It should be noted that Tree 16 was present at the time of the survey but will be removed by Metro for the construction of regional rail connector station prior to the initiation of construction activities of the project described in this report.
- Trees 17 through 21 are sweetgums growing within a fenced area to the northeast of the parking structure. These trees range from 8.4 to 10.3 inches dbh and 30 to 45 feet tall. These trees appear to be in good health with evidence of routine pruning. All of these trees have exposed roots, likely the result of excessive irrigation and/or soil compaction due to foot traffic.
- Tree 22 is a tree of heaven growing within a fenced area to the northeast of the parking structure. This tree is 10.8 inches dbh and 35 feet tall. The tree appears to be in good health. Exposed roots

are present, likely the result of excessive irrigation and/or soil compaction due to foot traffic. Additionally, this tree is considered to be a List B invasive species according to the California Invasive Plant Council (Cal-IPC 2016).

- Trees 23, 24, and 25 are southern live oaks growing along South Spring Street to the southeast of the project site. These trees range from 10.3 to 13.4 inches dbh and 15 to 25 feet tall. The trees appear to be in fair health with browning leaves, minor dieback, and abnormal leaf growth. Tree 24 has caused minor sidewalk damage consisting of lifting pavement. The areas provided for the trees' root growth appear to be insufficient for their long-term health.
- Trees 26, 27, and 28 are king palms growing within a fenced area to the northeast of the parking structure. These palms range from 10.3 to 18.1 inches dbh and 25 to 35 feet tall. The palms appear to be in fair health with browning and minor dieback evident.
- Trees 29 through 37 are Mexican fan palms growing within a fenced area to the northeast of the parking structure. These palms range from 11.6 to 15.7 inches dbh and 35 to 50 feet tall. These palms appear to be in fair health with browning and minor dieback evident.

The trees and palms observed on and adjacent to the proposed project are generally in good health with no conspicuous signs of stress or decay (e.g., trunk cavities, bleeding sap, signs of defoliation, or general lack of vigor). Evaluation of all trees and palms on or adjacent to the project site was based on a visual assessment from the ground. Because no significant indicators of stress were observed, no samples were taken from the trees, palms, or soil.

Most of the trees within the planting area to the northeast of the parking structure have exposed roots, likely the result of excessive irrigation and/or soil compaction from foot traffic.

The majority of the street trees that are adjacent to the project site have outgrown their original planting areas and have begun to impact the surrounding sidewalks and/or curbs. Impacts consist of significant cracking, lifting, and overgrowth onto the pavement. Removing or repairing the surrounding pavement of the trees or palms may impact their root stability or health.

All trees on the project site are proposed for removal, and no tree preservation is proposed. Mature trees with established root systems and palms with smaller fibrous root systems are likely to survive relocation and transplanting. Installing nursery stock would be a less expensive option for future landscaping. Therefore, relocation is not recommended for any of the trees in the survey area.

RECOMMENDATIONS

The following measures are recommended for tree establishment and maintenance on the project site:

1. The largest possible planting basin that the project site can accommodate should be provided for new trees. Larger planting basins are correlated with longer-lived trees, greater tree stability, and less sidewalk damage.
2. Once the new planting basins are constructed, soil samples should be collected from all planting locations and sent to a qualified soil laboratory for analysis. From each sampling location, 1 sample should be collected that represents the top 12 inches of the soil, along with a second sample that represents the soil from 12 to 24 inches deep. Any recommended soil amendments or treatments from the laboratory report should be implemented.

3. Newly planted trees should be allowed to develop as long as possible without pruning any of the branches (at least two years). Young trees need the energy provided by the leaves to help establish a healthy root system for successful establishment.
4. Once planted, a one- to two-inch layer of mulch should be placed within the planting basin of each new tree. Mulch should not be allowed to be placed in contact with the trunk of the tree as this can lead to rot.

Please call Trevor Bristle at (626) 351-2000 with any questions related to this report.

Sincerely,
P S O M A S

Melissa A. Howe
Vice President, Resource Management

Trevor Bristle
Certified Arborist
International Society of Arboriculture
Certificate No. WE-10233A

Attachment A – Exhibits 1 through 3

cc: David Hughes, Psomas (david.t.hughes@psomas.com)

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REFERENCES

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Los Angeles, City of. 2015 (December, last amended). *City of Los Angeles Municipal Code.* Cincinnati, OH: American Legal Publishing for the City. http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc.

———. 2008 (July). City of Los Angeles Department of City Planning Instructions for Filing Tentative Tract Maps. Los Angeles, CA: the City. http://planning.lacity.org/Forms_Procedures/6110.pdf.

ATTACHMENT A

EXHIBITS 1 THROUGH 3

Aerial Source: LAR-IAC 2014

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Project Location

Exhibit 1

Tree Inventory Report for the Tribune – South Parcel Project Site, City of Los Angeles

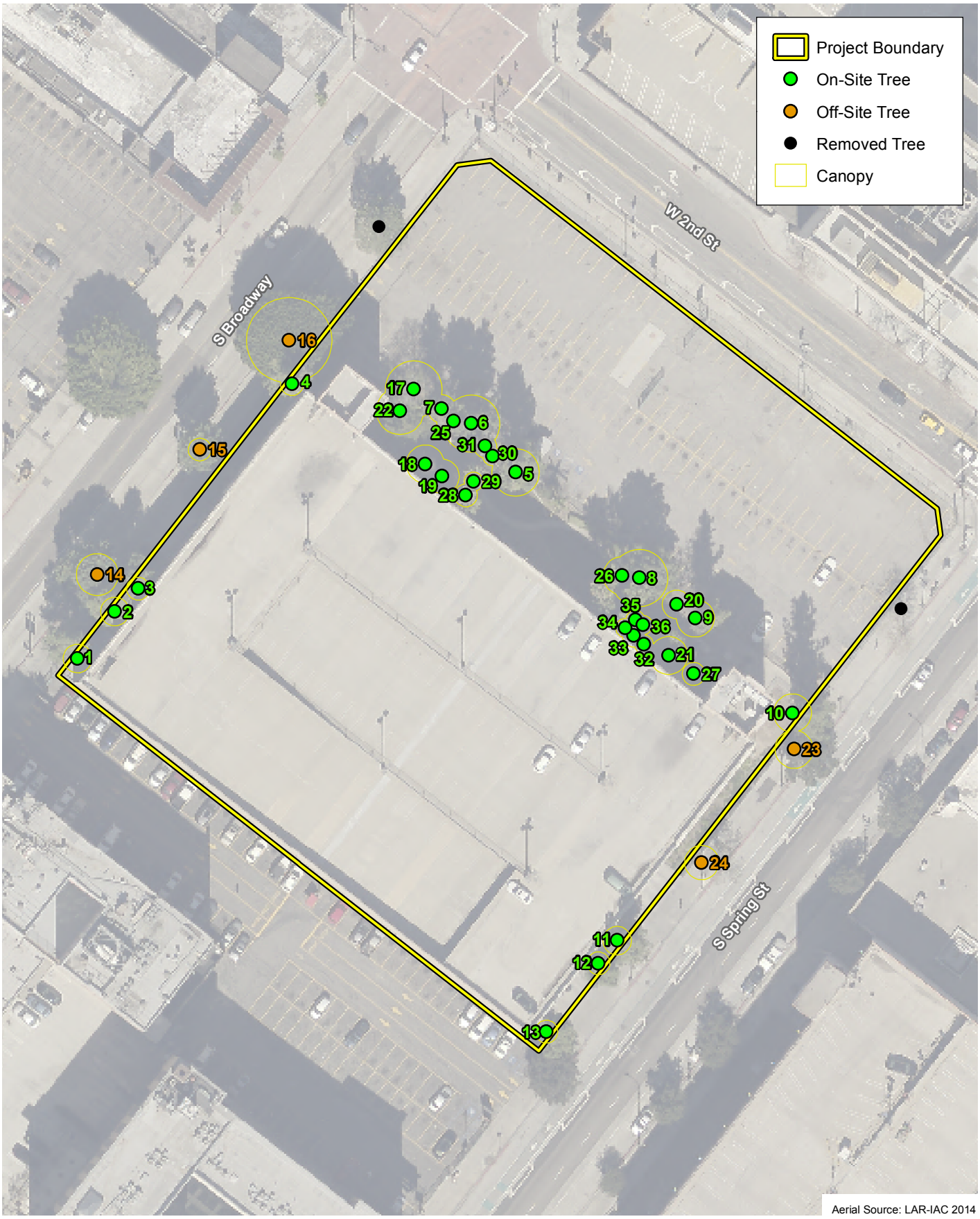
N
W E
S

200 100 0 200

Feet

BonTerra PSOMAS

(Rev: 06/08/2016 JAZ) H:\Projects\1TRI\1802\Graphics\TreeReport\ex1_RL_LV_20160603.pdf



Aerial Source: LAR-IAC 2014

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Tree Locations

Exhibit 2

Tree Inventory Report for the Tribune – South Parcel Project Site, City of Los Angeles

N
W E
S

70 35 0 70

Feet

BonTerra PSOMAS

(Rev: 06/27/2016 JAZ) H:\Projects\1TRI\1802\Graphics\TreeReport\ex2_TreeLocations_20160627.pdf

May 20, 2016. Representative photo of trees planted within fenced areas.

May 20, 2016. Representative photo of street trees around the project site.

Site Photographs

Exhibit 3a

Tree Inventory Report for the Tribune – South Parcel Project Site, City of Los Angeles

BonTerra PSOMAS

May 20, 2016. Example of exposed roots within fenced areas.

May 20, 2016. Example of street tree sidewalk damage.

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Site Photographs

Exhibit 3b

Tree Inventory Report for the Tribune – South Parcel Project Site, City of Los Angeles

BonTerra PSOMAS

Appendix IS-2

Soils and Geology Report

Geotechnologies, Inc.
Consulting Geotechnical Engineers
439 Western Avenue
Glendale, California 91201-2837
818.240.9600 • Fax 818.240.9675

August 16, 2016
Revised November 3, 2016
File No. 21257

Tribune Real Estate Holdings, LLC
202 West 1st Street
Los Angeles, California 90012

Attention: Murray McQueen

Subject: Soils and Geology Report to Support the Environmental Impact Report
Proposed Mixed-Use Development
213 South Spring Street, 200-210 South Broadway and 232-238 West 2nd Street
Los Angeles, California

Reference: *Report by Geotechnologies, Inc.:*
Preliminary Geotechnical Engineering Investigation, dated August 11, 2016.

Dear Mr. McQueen:

1.0 INTRODUCTION

This document is intended to discuss potential soil and geological issues for the proposed development, as required by Appendix G of the California Environmental Quality Act (CEQA) Guidelines. This document has been prepared subsequent to review of available geotechnical engineering documents, and review of the referenced preliminary geotechnical engineering investigation, prepared recently by this firm for the proposed development.

2.0 SITE CONDITIONS

The site is located at 213 South Spring Street, 200-210 South Broadway and 232-238 West 2nd Street, in the Downtown area of the City of Los Angeles, California. The site is rectangular in shape, and approximately one acre in area. The site is bounded by Second Street to the north, Spring Street to the east, a six-story parking structure to the south, and Broadway to the west. The site is shown relative to nearby topographic features in the enclosed Vicinity Map.

The site is currently developed with a paved parking lot. The site grade descends gently to the southeast, with an elevation relief on the order of 4 feet. Vegetation at the site is limited, and consists of a few mature trees located along the southern property line. Drainage across the site appears to be by sheetflow to the city streets to the east.

3.0 PROJECT SCOPE

Preliminary information concerning the proposed development was furnished by the client, and by the office of Nabih Youssef and Associates. In addition, the Architectural Plans prepared by Gensler, dated May 20, 2016, were reviewed. The proposed development consists of the construction of a mixed-use structure. The proposed structure will consist of a 7-story podium, and a 30-story high-rise tower. The high-rise tower will be built within the eastern portion of the podium. The location and alignment of the proposed structure is shown in the enclosed Geologic Plan.

The eastern portion of the proposed structure will be underlain by a subterranean level. The finished floor elevation of the subterranean level will extend 14 feet in depth below the proposed ground level. Within the southwestern corner, the proposed 7-story podium will not be underlain by a subterranean level, and will be built at-grade. Grading is expected to consist of excavations on the order of 20 to 25 feet in depth for construction of the proposed subterranean level and foundation elements.

The majority of the western portion of the structure will be underlain by a future Metropolitan Transportation Authority (MTA) underground station. The proposed location and alignment of this underground station is shown relative to the proposed mixed-use structure on the enclosed Geologic Plan and Cross Section A-A'. It is anticipated that the finished floor elevation of this station will be elevation 225.95 feet, which corresponds to an approximate depth of 62 feet below the existing site grade. It is the understanding of this firm that the MTA station has been designed, and will be built prior to construction of the proposed mixed-use structure, addressed herein. It is further understood that the MTA station has been designed to support the loads anticipated from the proposed mixed-use structure, addressed herein. This firm was not involved in the design of the future MTA station.

The proposed structure will be designed in accordance with the provisions of the applicable City of Los Angeles Building Code. The referenced preliminary geotechnical engineering investigation has been prepared to satisfy the requirements for filing a Vesting Tentative Tract Map Application with the Department of City Planning. In addition to addressing the geologic hazards anticipated at the site, the investigation also provides preliminary design recommendations and parameters to aid in the design of the proposed structure. A final geotechnical investigation will be prepared once the project achieves better definition.

4.0 FIELD EXPLORATION

Geotechnologies, Inc. has recently conducted subsurface exploration at the subject site for the preparation of the referenced preliminary geotechnical engineering investigation. The site was explored on June 20 and 21, and July 18, 2016, by excavating two exploratory borings.

One of the borings was drilled to a depth of 170 feet below the existing grade with the aid of a truck-mounted drilling machine using 8-inch diameter hollowstem augers. The second boring was excavated to a depth of 11 feet with the aid of a 4-inch diameter hand auger. The exploration locations are shown on the enclosed plot plans, and the geologic materials encountered are logged on the enclosed Plates A-1 and A-2.

5.0 RESEARCH

The following geotechnical investigations have been conducted in the subject site, and its immediate vicinity. Copies of the first two investigations listed below were obtained by this firm from the City of Los Angeles, Department of Building and Safety, Data and Records Department. A copy of the third investigation was provided to this firm by the client.

1. ***LeRoy Crandall and Associates, August 20, 1985, Report of Foundation Investigation, Proposed Pedway, Spring and Second Street, Los Angeles, California, Job Number A-85253.***
   Two geotechnical borings were excavated within the eastern portion of the subject site for the preparation of this investigation. The borings, labeled 1 and 2, were excavated to a depth of 40 and 32 feet, respectively, with the aid of a 24-inch diameter bucket auger. The location of these borings is shown in the enclosed Plot Plan, and the individual logs may be found in the Appendix of this report.

2. ***LeRoy Crandall and Associates, May 27, 1987, Report of Supplementary Foundation Investigation, Proposed Parking Structure, Broadway South of Second Street, Los Angeles, California, Job Number A-85091-B.***
   Three geotechnical borings were excavated immediately to the south of the subject site as part of this investigation. The borings, labeled 9, 10 and 11, were excavated to depths ranging between 49 and 51 feet with the aid of a 24-inch diameter bucket auger. The location of these borings is shown in the enclosed Plot Plan, and the individual logs may be found in the Appendix of this report.

3. ***Earth Mechanics, Inc., February 3, 2016, Final Geotechnical Data Report for Regional Transit Corridor Project, Project Number 14-121.***
   Two geotechnical borings and one groundwater monitoring well were excavated within the southern portion of the subject site as part of this investigation. The borings, labeled BH6 and BH7, were excavated to a depth of 200 and 122 feet, respectively, with the aid of an 8-inch diameter hollowstem auger. The groundwater monitoring well installed is labeled BH6-A, and is reported to extend to a depth of 86 feet. The location of the borings and groundwater monitoring well is shown in the enclosed Plot Plan, and the individual logs may be found in the Appendix of this report.

6.0 GEOLOGIC MATERIALS

Fill:
Fill materials were encountered to depths ranging between 5 and 15 feet below the existing grade in the exploratory excavations performed on the site by this firm, as well as previous geotechnical consultants. The fill consists of gravelly silty sands, silty sands and sands, which range from light brown to dark grayish brown in color, and are dry to moist, medium dense to very dense, and fine to coarse grained, with occasional cobbles and construction debris.

It is the opinion of this firm that the deep fill may be related to the backfill of former basements located at the site.

Alluvium:
In the majority of the exploratory excavations, the fill materials were observed to be underlain by native alluvial soils, consisting of interlayered mixtures of sand, silt and clay. The native alluvial soils range from yellowish to dark brown in color, and are slightly moist to moist, medium dense to very dense, or stiff to very stiff, and fine to medium grained, with gravel and cobbles.

Bedrock (Fernando Formation):
Bedrock corresponding to the Fernando Formation was encountered in the exploratory excavations, underlying the existing fill and alluvium. The bedrock was observed at depths ranging between 15 and 22 feet below the existing grade.

The Fernando Formation consists of siltstone and claystone, which is grayish brown to dark gray in color, slightly moist to moist, and firm to hard in consistency. The upper portion of the bedrock was observed to be weathered.

The Fernando Formation is typically massive to poorly bedded. No bedding was encountered during the exploration prosecuted by this office. Bedding within the Fernando Formation has been mapped north of the site by Lamar, 1970. The closest bedding mapped dips south between about 75 and 83 degrees.

More detailed descriptions of the earth materials encountered may be obtained from individual logs of the subsurface excavations.

7.0 GROUNDWATER

The historically highest groundwater level was established by review of the Los Angeles 7½ Minute Quadrangle Seismic Hazard Evaluation Report, Plate 1.2, Historically Highest Ground Water Contours (CDMG, 2006). Review of this plate indicates that the historically highest groundwater level for the site was on the order of 30 feet below the existing grade.

Water seepage was observed in one of the borings excavated by this firm, as well as several of the borings excavated by previous geotechnical consultants. Copies of the boring logs prepared by the previous geotechnical consultants may be found in the Appendix of this report. In the opinion of this firm, this water seepage would not represent the static groundwater table, and most likely represents a perched condition due to the underlying siltstone bedrock. The following table summarizes the water seepage levels observed at the site and its immediate vicinity:

Boring No.	Geotechnical Consultant	Drilling Date	Depth to Water Seepage Below G.S. (feet)
B1	Geotechnologies, Inc.	06/20/2016	13.5
BH6-A	Earth Mechanics, Inc.	03/12/2015	15.5
9	LeRoy Crandall & Assoc.	05/02/1987	14.0
10	LeRoy Crandall & Assoc.	05/02/1987	17.0
11	LeRoy Crandall & Assoc.	05/03/1987	16.5

8.0 LOCAL GEOLOGY

The site is located in the Elysian Hills, which are a low, rolling group of hills that trend in a northwest to southeast direction. The Elysian Hills expose the Puente Formation, a well bedded assemblage of siltstone and sandstone and the Fernando Formation a younger, poorly bedded claystone. The upper facies of the Puente Formation, and the overlying Fernando Formation, are comprised of diatomaceous siltstone (Lamar, D. L., 1970). Relict alluvial sediments from an ancient Los Angeles River alignment are found in the Elysian Hills and cap some of the higher elevations of the Bunker Hill area of downtown Los Angeles. The geology of the site vicinity is shown on the attached Local Geologic Map.

The major faults of the area are the Hollywood Fault which forms the northeast border of the Elysian Park Hills with the Hollywood Hills, and the Puente Hills blind thrust fault, which underlies the site at a depth of several miles (Shaw and Suppe, 1996, and Shaw and Shearer, 1999).

9.0 REGIONAL GEOLOGIC SETTINGS

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

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

10.0 SOIL AND GEOLOGY ISSUES

a) Regional Faulting

Based on criteria established by the California Division of Mines and Geology (CDMG) now called California Geologic Survey (CGS), faults may be categorized as active, potentially active, or inactive. Active faults are those which show evidence of surface displacement within the last 11,000 years (Holocene-age). Potentially-active faults are those that show evidence of most recent surface displacement within the last 1.6 million years (Quaternary-age). Faults showing no evidence of surface displacement within the last 1.6 million years are considered inactive for most purposes, with the exception of design of some critical structures.

Buried thrust faults are faults without a surface expression but are a significant source of seismic activity. They are typically broadly defined based on the analysis of seismic wave recordings of hundreds of small and large earthquakes in the Southern California area. Due to the buried nature of these thrust faults, their existence is usually not known until they produce an earthquake. The risk for surface rupture potential of these buried thrust faults is inferred to be low (Leighton, 1990). However, the seismic risk of these buried structures in terms of recurrence and maximum potential magnitude is not well established. Therefore, the potential for surface rupture on these surface-verging splays at magnitudes higher than 6.0 cannot be precluded.

A list of faults located within 60 miles (100 kilometers) from the project sites has been provided in the enclosed table titled: Seismic Source Summary Table. A Southern California Fault Map has also been enclosed. The following sections describe some of the regional active faults, potentially active faults, and blind thrust faults.

i) Active Faults

Hollywood Fault

The Hollywood fault is part of the Transverse Ranges Southern Boundary fault system. The Hollywood fault is located approximately 4.51 miles northwest of the site. This fault trends east-west along the base of the Santa Monica Mountains from the West Beverly Hills Lineament in the West Hollywood–Beverly Hills area to the Los Feliz area of Los Angeles. The Hollywood fault is the eastern segment of the reverse oblique Santa Monica–Hollywood fault. Based on geomorphic evidence, stratigraphic correlation between exploratory borings, and fault trenching studies, this fault is classified as active.

Until recently, the approximately 9.3-mile long Hollywood fault was considered to be expressed as a series of linear ground-surface geomorphic expressions and south-facing ridges along the south margin of the eastern Santa Monica Mountains and the Hollywood Hills. Multiple recent fault rupture hazard investigations have shown that the Hollywood fault is located south of the ridges and bedrock outcroppings along portions of Sunset Boulevard. The Hollywood fault has not produced any damaging earthquakes during the historical period and has had relatively minor micro-seismic activity. It is estimated that the Hollywood fault is capable of producing a maximum 6.7 magnitude earthquake. In 2014, the California Geological Survey established an Earthquake Fault Zone for the Hollywood Fault.

Raymond Fault

The Raymond fault is located approximately 4.99 miles to the north of the site. The Raymond fault is an effective groundwater barrier which divides the San Gabriel Valley into groundwater sub-basins. Much of the geomorphic evidence for the Raymond fault has been obliterated by urbanization of the San Gabriel Valley. However, a discontinuous escarpment can be traced from Monrovia to the Arroyo Seco in South Pasadena. The very bold, “knife edge” escarpment in Monrovia parallel to Scenic Drive is believed to be a fault scarp of the Raymond fault. Trenching of the Raymond fault is reported to have revealed Holocene movement (Weaver and Dolan, 1997).

The recurrence interval for the Raymond fault is probably slightly less than 3,000 years, with the most recent documented event occurring approximately 1,600 years ago (Crook, et al, 1978). However, historical accounts of an earthquake that occurred in July 1855 as reported by Toppozada and others, 1981, places the epicenter of a Richter Magnitude 6 earthquake within the Raymond fault. It is believed that the Raymond fault is capable of producing a 6.8 magnitude earthquake. The Raymond Fault is considered active by the California Geological Survey.

Verdugo Fault

The Verdugo Fault is located approximately 7.19 miles to the north of the site. The Verdugo Fault runs along the southwest edge of the Verdugo Mountains. The fault displays a reverse motion. According to Weber, et. al., (1980) 2 to 3 meter high scarps were identified in alluvial fan deposits in the Burbank and Glendale areas. Further to the northeast, in Sun Valley, a fault was reportedly identified at a depth of 40 feet in a sand and gravel pit. Although considered active by the County of Los Angeles, Department of Public Works (Leighton, 1990), and the United States Geological Survey, the fault is not designated with an Earthquake Fault Zone by the California Geological Survey. It is estimated that the Verdugo Fault is capable of producing a maximum 6.9 magnitude earthquake.

Newport-Inglewood Fault System

The Newport-Inglewood fault system is located 7.50 miles to the southwest of the site. The Newport-Inglewood fault zone is a broad zone of discontinuous north to northwestern echelon faults and northwest to west trending folds. The fault zone extends southeastward from West Los Angeles, across the Los Angeles Basin, to Newport Beach and possibly offshore beyond San Diego (Barrows, 1974; Weber, 1982; Ziony, 1985).

The onshore segment of the Newport-Inglewood fault zone extends for about 37 miles from the Santa Ana River to the Santa Monica Mountains. Here it is overridden by, or merges with, the east-west trending Santa Monica zone of reverse faults.

The surface expression of the Newport-Inglewood fault zone is made up of a strikingly linear alignment of domal hills and mesas that rise on the order of 400 feet above the surrounding plains. From the northern end to its southernmost onshore expression, the Newport-Inglewood fault zone is made up of: Cheviot Hills, Baldwin Hills, Rosecrans Hills, Dominguez Hills, Signal Hill-Reservoir Hill, Alamitos Heights, Landing Hill, Bolsa Chica Mesa, Huntington Beach Mesa, and Newport Mesa. Several single and multiple fault strands, arranged in a roughly left stepping en echelon arrangement, make up the fault zone and account for the uplifted mesas.

The most significant earthquake associated with the Newport-Inglewood fault system was the Long Beach earthquake of 1933 with a magnitude of 6.3 on the Richter scale. It is believed that the Newport-Inglewood fault zone is capable of producing a 7.5 magnitude earthquake.

Sierra Madre Fault System

The Sierra Madre fault alone forms the southern tectonic boundary of the San Gabriel Mountains in the northern San Fernando Valley. It consists of a system of faults approximately 75 miles in length. The individual segments of the Sierra Madre fault system range up to 16 miles in length and display a reverse sense of displacement and dip to the north. The most recently active portions of the zone include the Mission Hills, Sylmar and Lakeview segments, which produced an earthquake in 1971 of magnitude 6.4. Tectonic rupture along the Lakeview Segment during the San Fernando Earthquake of 1971 produced displacements of approximately 2½ to 4 feet upward and southwestward.

It is believed that the Sierra Madre fault zone is capable of producing an earthquake of magnitude 7.3. The closest trace of the fault is located approximately 11.43 miles northeast of the site.

Whittier-Elsinore Fault System

The Whittier fault is located approximately 11.99 miles to the southeast of the site. The Whittier fault together with the Chino fault comprises the northernmost extension of the northwest trending Elsinore fault system. The mapped surface of the Whittier fault extends in a west-northwest direction for a distance of 20 miles from the Santa Ana River to the terminus of the Puente Hills. The Whittier fault is essentially a strike-slip, northeast dipping fault zone which also exhibits evidence of reverse movement along with en echelon[a] fault segments, en echelon folds and anatomizing (braided) fault segments. Right lateral offsets of stream drainages of up to 8800 feet (Durham and Yerkes, 1964) and vertical separation of the basement complex of 6,000 to 12,000 feet (Yerkes, 1972), have been documented. It is believed that the Whittier fault is capable of producing a 7.8 magnitude earthquake.

The Whittier Narrows earthquakes of October 1, 1987, and October 4, 1987, occurred in the area between the westernmost terminus of the mapped trace of the Whittier fault and the frontal fault system. The main 5.9 magnitude shock of October 1, 1987 was not caused by slip on the Whittier fault. The quake ruptured a gently dipping thrust fault with an east-west strike (Haukson, Jones, Davis and others, 1988). In contrast, the earthquake of October 4, 1987, is assumed to have occurred on the Whittier fault as focal mechanisms show mostly strike-slip movement with a small reverse component on a steeply dipping northwest striking plane (Haukson, Jones, Davis and others, 1988).

[a] *En echelon refers to closely-spaced, parallel or subparallel, overlapping or step-like minor structural features*

Malibu Coast Fault

The Malibu Coast fault is part of the Transverse Ranges Southern Boundary fault system, a west-trending system of reverse, oblique-slip, and strike-slip faults that extends for more than approximately 124 miles along the southern edge of the Transverse Ranges and includes the Hollywood, Raymond, Anacapa–Dume, Malibu Coast, Santa Cruz Island, and Santa Rosa Island faults.

The Malibu Coast fault zone runs in an east-west orientation onshore subparallel to and along the shoreline for a linear distance of about 17 miles through the Malibu City limits, but also extends offshore to the east and west for a total length of approximately 37.5 miles. The onshore Malibu Coast fault zone involves a broad, wide zone of faulting and shearing as much as 1 mile in width. While the Malibu Coast Fault Zone has not been officially designated as an active fault zone by the State of California and no Special Studies Zones have been delineated along any part of the fault zone under the Alquist-Priolo Act of 1972, evidence for Holocene activity (movement in the last 11,000 years) has been established in several locations along individual fault splays within the fault zone. Due to such evidence, several fault splays within the onshore portion of the fault zone are identified as active.[b]

Large historic earthquakes along the Malibu Coast fault include the 1979, 5.2 magnitude earthquake and the 1989, 5.0 magnitude earthquake.[c] The Malibu Coast fault zone is approximately 16.12 miles west of the site and is believed to be capable of producing a maximum 7.0 magnitude earthquake.

Palos Verdes Fault

Studies indicate that there are several active on-shore extensions of the strike-slip Palos Verdes fault, which is located approximately 17.08 miles southwest of the site. Geophysical data also indicate the off-shore extensions of the fault are active, offsetting Holocene age deposits. No historic large magnitude earthquakes are associated with this fault. However, the fault is considered active by the California Geological Survey. It is estimated that the Palos Verdes fault is capable of producing a maximum 7.7 magnitude earthquake.

San Gabriel Fault System

The San Gabriel fault system is located approximately 18.45 miles north of the site. The San Gabriel fault system comprises a series of subparallel, steeply north-dipping faults trending approximately north 40 degrees west with a right-

[b] *City of Malibu Planning Department, Malibu General Plan, Chapter 5.0, Safety and Health Element, http://qcode.us/codes/malibu-general-plan/; accessed October 25, 2012.*
[c] *California Institute of Technology, Southern California Data Center. Chronological Earthquake Index, www.data.scec.org/significant/malibu1979.html; accessed October 25, 2012.*

lateral sense of displacement. There is also a small component of vertical dip-slip separation. The fault system exhibits a strong topographic expression and extends approximately 90 miles from San Antonio Canyon on the southeast to Frazier Mountain on the northwest. The estimated right lateral displacement on the fault varies from 34 miles (Crowell, 1982) to 40 miles (Ehlig, 1986), to 10 miles (Weber, 1982). Most scholars accept the larger displacement values and place the majority of activity between the Late Miocene and Late Pliocene Epochs of the Tertiary Era (65 to 1.8 million years before present).

Portions of the San Gabriel fault system are considered active by California Geological Survey. Recent seismic exploration in the Valencia area (Cotton and others, 1983; Cotton, 1985) has established Holocene offset. Radiocarbon data acquired by Cotton (1985) indicate that faulting in the Valencia area occurred between 3,500 and 1,500 years before present.

It is hypothesized by Ehlig (1986) and Stitt (1986) that the Holocene offset on the San Gabriel fault system is due to sympathetic (passive) movement as a result of north-south compression of the upper Santa Susana thrust sheet. Seismic evidence indicates that the San Gabriel fault system is truncated at depth by the younger, north-dipping Santa Susana-Sierra Madre faults (Oakeshott, 1975; Namson and Davis, 1988).

Santa Susana Fault

The Santa Susana fault extends approximately 17 miles west-northwest from the northwest edge of the San Fernando Valley into Ventura County and is at the surface high on the south flank of the Santa Susana Mountains. The fault ends near the point where it overrides the south-side-up South strand of the Oak Ridge fault. The Santa Susana fault strikes northeast at the Fernando lateral ramp and turns east at the northern margin of the Sylmar Basin to become the Sierra Madre fault. This fault is exposed near the base of the San Gabriel Mountains for approximately 46 miles from the San Fernando Pass at the Fernando lateral ramp east to its intersection with the San Antonio Canyon fault in the eastern San Gabriel Mountains, east of which the range front is formed by the Cucamonga fault. The Santa Susana fault has not experienced any recent major ruptures except for a slight rupture during the 6.5 magnitude 1971 Sylmar earthquake.[d] The Santa Susana Fault is considered to be active by the County of Los Angeles. It is believed that the Santa Susana fault has the potential to produce a 6.9 magnitude earthquake. The closest trace of the fault is located approximately 23.6 miles north of the site.

[d] *California Institute of Technology, Southern California Data Center. Chronological Earthquake Index, www.data.scec.org/significant/santasusana.html; accessed May 24, 2012.*

San Andreas Fault System

The San Andreas Fault system forms a major plate tectonic boundary along the western portion of North America. The system is predominantly a series of northwest trending faults characterized by a predominant right lateral sense of movement. At its closest point the San Andreas Fault system is located approximately 34.23 miles to the northeast of the site.

The San Andreas and associated faults have had a long history of inferred and historic earthquakes. Cumulative displacement along the system exceeds 150 miles in the past 25 million years (Jahns, 1973). Large historic earthquakes have occurred at Fort Tejon in 1857, at Point Reyes in 1906, and at Loma Prieta in 1989. Based on single-event rupture length, the maximum Richter magnitude earthquake is expected to be approximately 8.25 (Allen, 1968). The recurrence interval for large earthquakes on the southern portion of the fault system is on the order of 100 to 200 years.

ii) Potentially Active Faults

Santa Monica Fault

The Santa Monica fault, located approximately 4.54 miles to the northwest of the sites, is also part of the Transverse Ranges Southern Boundary fault system. The Santa Monica fault extends east from the coastline in Pacific Palisades through Santa Monica and West Los Angeles and merges with the Hollywood fault at the West Beverly Hills Lineament in Beverly Hills where its strike is northeast. It is believed that at least six surface ruptures have occurred in the past 50 thousand years. In addition, a well-documented surface rupture occurred between 10 and 17 thousand years ago, although a more recent earthquake probably occurred 1 to 3 thousand years ago. This leads to an average earthquake recurrence interval of 7 to 8 thousand years.[e] It is thought that the Santa Monica fault system may produce earthquakes with a maximum magnitude of 7.4.

Anacapa-Dume Fault

The Anacapa–Dume fault, located approximately 17.72 miles to the northwest of the site, is a near-vertical offshore escarpment exceeding 600 meters locally, with a total length exceeding 62 miles. This fault is also part of the Transverse Ranges Southern Boundary fault system. It occurs as close as 3.6 miles offshore south of Malibu at its western end, but trends northeast where it merges with the offshore segments of the Santa Monica Fault Zone. It is believed that the Anacapa–Dume fault is responsible for generating the historic 1930 magnitude 5.2 Santa Monica

[e] *Southern California Earthquake Center, a National Science Foundation and U.S. Geological Survey Center. Active Faults in the Los Angeles Metropolitan Region, www.scec.org/research/special/SCEC001activefaultsLA.pdf; accessed May 24, 2012.*

earthquake, the 1973 magnitude 5.3 Point Mugu earthquake, and the 1979 and 1989 Malibu earthquakes, each of which possessed a magnitude of 5.0.[f] The Anacapa–Dume fault is thought to be capable of producing a maximum magnitude 7.2 earthquake.

iii) Blind Thrusts Faults

Blind or buried thrust faults are faults without a surface expression but are a significant source of seismic activity. By definition, these faults have no surface trace, therefore the potential for ground surface rupture is considered remote. They are typically broadly defined based on the analysis of seismic wave recordings of hundreds of small and large earthquakes in the Southern California area. Due to the buried nature of these thrust faults, their existence is sometimes not known until they produce an earthquake. Two blind thrust faults in the Los Angeles metropolitan area are the Puente Hills blind thrust and the Elysian Park blind thrust. Another blind thrust fault of note is the Northridge fault located in the northwestern portion of the San Fernando Valley.

The Elysian Park anticline is thought to overlie the Elysian Park blind thrust. This fault has been estimated to cause an earthquake every 500 to 1,300 years in the magnitude range 6.2 to 6.7. The Elysian Park anticline is approximately 1.25 miles to the north of the site.

The Puente Hills blind thrust fault extends eastward from Downtown Los Angeles to the City of Brea in northern Orange County. The Puente Hills blind thrust fault includes three north-dipping segments, named from east to west as the Coyote Hills segment, the Santa Fe Springs segment, and the Los Angeles segment. These segments are overlain by folds expressed at the surface as the Coyote Hills, Santa Fe Springs Anticline, and the Montebello Hills.

The Los Angeles segment of the Puente Hills blind thrust fault lies directly beneath Downtown Los Angeles, and therefore beneath the site. According to the USGS, the surface of the Puente Hills Thrust is located approximately 3.94 miles beneath the site.

The Santa Fe Springs segment of the Puente Hills blind thrust fault is believed to be the cause of the October 1, 1987, Whittier Narrows Earthquake. Based on deformation of late Quaternary age sediments above this fault system and the occurrence of the Whittier Narrows earthquake, the Puente Hills blind thrust fault is considered an active fault capable of generating future earthquakes beneath the

[f] *City of Malibu Planning Department. Malibu General Plan, Chapter 5.0, Safety and Health Element, http://qcode.us/codes/malibu-general-plan/; accessed May 24, 2012.*

Los Angeles Basin. A maximum moment magnitude of 7.0 is estimated by researchers for the Puente Hills blind thrust fault.

The Mw 6.7 Northridge earthquake was caused by the sudden rupture of a previously unknown, blind thrust fault. This fault has since been named the Northridge Thrust, however it is also known in some of the literature as the Pico Thrust. It has been assigned a maximum magnitude of 6.9 and a 1,500 to 1,800 year recurrence interval. The Northridge thrust is located 19.33 miles to the northwest of the site.

b) Surface Ground Rupture

In 1972, the Alquist-Priolo Special Studies Zones Act (now known as the Alquist-Priolo Earthquake Fault Zoning Act) was passed into law. The Act defines "active" and "potentially active" faults utilizing the same aging criteria as that used by California Geological Survey (CGS). However, established state policy has been to zone only those faults which have direct evidence of movement within the last 11,000 years. It is this recency of fault movement that the CGS considers as a characteristic for faults that have a relatively high potential for ground rupture in the future.

CGS policy is to delineate a boundary from 200 to 500 feet wide on each side of the known fault trace based on the location precision, the complexity, or the regional significance of the fault. If a site lies within an Earthquake Fault Zone, a geologic fault rupture investigation must be performed that demonstrates that the proposed building site is not threatened by surface displacement from the fault before development permits may be issued.

Surface rupture is defined as surface displacement which occurs along the surface trace of the causative fault during an earthquake. Based on research of available literature, no known active or potentially active faults, capable of surface rupture, underlie the subject site. The nearest Earthquake Fault Zone is located approximately 4½ miles to the north of the site, for the Hollywood Fault.

As explained before, the Puente Hills blind thrust is located directly beneath the site, at an approximate depth of 3.94 mile. However, the potential for surface ground rupture on this thrust fault is remote.

Based on the above considerations, the potential for surface ground rupture at the subject site is considered low.

c) Seismicity

As with all of Southern California, the project sites are subject to potential strong ground motion, should a moderate to strong earthquake occur on a local or regional fault. Design of any proposed structures on the sites in accordance with the provisions of the applicable City of Los Angeles Building Code will mitigate the potential effects of strong ground shaking.

d) Seismic Velocity Measurement

Downhole seismic velocity measurements were performed by GeoPentech within Boring Number 1, which was excavated to a depth of 170 feet below the existing site grade. The following table summarizes the V_{S30} calculated within Boring 1:

Depth Range (ft, below ground surface)	**V_{S30}** (ft/sec)
0 to 100	1,090
10 to 110	1,160
20 to 120	1,240
30 to 130	1,260
40 to 140	1,340
50 to 150	1,400
60 to 160	1,440
70 to 170	1,480

e) Deaggregated Seismic Source Parameters

The peak ground acceleration (PGA) and modal magnitude for the sites were obtained from the USGS Probabilistic Seismic Hazard Deaggregation program (USGS, 2008). The parameters are based on a 2 percent in 50 years ground motion (2475 year return period). A shear wave velocity (Vs30) of 332 meters per second (or 1,090 feet per second) was utilized, and was based on the downhole seismic velocity analysis performed by GeoPentech. The deaggregation program indicates a PGA of 0.91g and a modal magnitude of 6.6 for the site.

f) 2013 California Building Code Seismic Parameters

Based on information derived from the subsurface investigation, and the downhole velocity measurement performed by GeoPentech, the subject site is classified as Site Class D, which corresponds to a "Stiff Soil" Profile, according to Table 20.3-1 of ASCE 7-10. This information and the site coordinates were input into the USGS U.S. Seismic Design Maps tool (Version 3.1.0) to calculate the ground motions for the sites.

2013 CALIFORNIA BUILDING CODE SEISMIC PARAMETERS	
Site Class	D
Mapped Spectral Acceleration at Short Periods (S_S)	2.424g
Site Coefficient (F_a)	1.0
Maximum Considered Earthquake Spectral Response for Short Periods (S_{MS})	2.424g
Five-Percent Damped Design Spectral Response Acceleration at Short Periods (S_{DS})	1.616g
Mapped Spectral Acceleration at One-Second Period (S_1)	0.850g
Site Coefficient (F_v)	1.5
Maximum Considered Earthquake Spectral Response for One-Second Period (S_{M1})	1.276g
Five-Percent Damped Design Spectral Response Acceleration for One-Second Period (S_{D1})	0.850g

g) Liquefaction

The Seismic Hazards Maps of the State of California (CDMG, 1999), classify the site as part of the potentially "Liquefiable" area. This determination is based on groundwater depth records, soil type and distance to a fault capable of producing a substantial earthquake. A copy of this map has been enclosed.

Tertiary-age bedrock of Fernando Formation was encountered at the site between depths of 15 and 22 feet below the site grade. Due to its long tectonic history and density, this bedrock is not considered to be susceptible to liquefaction. It is anticipated that the foundations to support the proposed structure will bear in the Fernando Formation bedrock. Therefore, the proposed structure would not be considered susceptible to liquefaction. Furthermore, the structure would not be considered susceptible to liquefaction effects, such as lateral spreading and surface manifestation.

h) Dynamic Settlement

It is anticipated that the foundations to support the proposed structure will bear in Fernando Formation bedrock. Due to its long tectonic history and density, this bedrock is not considered to be susceptible to significant seismically-induced settlement. Therefore, it is anticipated that the proposed structure will not be subject to significant seismically-induced settlement.

i) Regional Subsidience

The site is not located within a zone on known subsidence due to oil or other fluid withdrawal.

j) Landsliding

The probability of seismically-induced landslides occurring on the site is considered to be negligible due to the general lack of substantive elevation difference across or adjacent to the site. Therefore, potential impacts related to landsliding would be less than significant.

k) Collapsible Soils

The Fernando Formation Bedrock, in which the structure will bear, is not considered prone to hydroconsolidation.

l) Tsunamis, Seiches and Flooding

Tsunamis are large ocean waves generated by sudden water displacement caused by a submarine earthquake, landslide, or volcanic eruption. The site is high enough and far enough from the ocean to preclude being prone to hazards of a tsunami.

Seiches are large waves generated in enclosed bodies of water in response to ground shaking. No major water-retaining structures are located immediately up gradient from the site. Therefore, the risk of flooding from a seismically-induced seiche is considered to be remote.

Review of the County of Los Angeles Flood and Inundation Hazards Map, Leighton (1990), indicates the site does not lie within mapped inundation boundaries due to a breached upgradient reservoir.

Review of the applicable Flood Insurance Rate Map indicates the site lies outside the 0.2% annual chance floodplain area. A copy of this map is enclosed.

m) City of Los Angeles Methane Zone

Based on review of the NavigateLA Website, developed by the City of Los Angeles, Bureau of Engineering, Department of Public Works, the subject site is not located within the limits of a City of Los Angeles Methane Zone or Methane Buffer Zone. A copy of this map has been enclosed.

n) Oil Wells

Based on review of the California State Division of Oil, Gas and Geothermal Resources (DOGGR) On-line Mapping System, the site is not located within the limits of an oil field, and no oil or gas wells were drilled on the site.

o) Temporary Excavations

All required excavations are expected to be sloped, or properly shored, in accordance with the provisions of the applicable City of Los Angeles Building Code. Therefore, the project would not result in any on-site or off-site landslide. Shoring systems may include soldier piles with rakers and/or tiebacks. Tiebacks would extend below adjacent properties and public right of ways. Appropriate notifications and agreements will be obtained by the development team prior to tieback installations.

p) Ground Failure

The proposed construction will not cause, or increase the potential for any seismic related ground failure on the project site or adjacent sites.

q) Expansive Soils

The upper site soils consist of fill materials and alluvial soils to an approximate depth of 15 to 22 feet below grade. These soils consist of a mixture of sand, silt, and gravel. These soils are underlain by bedrock of the Fernando Formation.

This firm tested a bulk sample representative of the upper fill and alluvial soils, as well as bulk sample representative of the bedrock. The upper fill and alluvial soils were observed to be on the very low expansion range, while the bedrock was on the moderate expansion range. Design of the proposed structure in accordance with the provisions of the applicable City of Los Angeles Building Code will fully mitigate the potential effects of moderately expansive soils.

r) Sedimentation and Erosion

Grading, excavation and other earth moving activities could potentially result in erosion and sedimentation. For any grading proposed in the site from November to April (generally considered the rainy season) an erosion control plan consistent with the City of Los Angeles requirements would need to be prepared. Compliance with minimum code requirements will render project impacts related to sedimentation and erosion less than significant.

s) Landform Alterations

There are no significant hills, canyons, ravines, outcrops or other geologic or topographic features on the site. Therefore, any proposed project would not adversely affect any prominent geologic or topographic features.

t) Septic Tanks

It is the understanding of this firm that sewers are available at the site for wastewater disposal. No septic tanks or alternative disposal systems are necessary or anticipated for any future site projects.

The conditions identified in this document are typical of sites within this area of Los Angeles, and of a type that are routinely addressed through regulatory measures. Geotechnologies, Inc. appreciates the opportunity to provide our services on this project. Should you have any questions please contact this office.

Respectfully submitted,
GEOTECHNOLOGIES, INC.

GREGORIO VARELA
R.C.E. 81201

EDWARD F. HIL
G.E. 2126/C.E.G. 1403

GV/EFH:km

Enclosures: References
Vicinity Map
Geologic Plan
Local Geologic Map
Historically Highest Groundwater Levels Plate
Seismic Source Summary Table
Southern California Fault Map
Seismic Hazard Zone Map
Methane Zone Risk Map
Flood Insurance Rate Map
Plates A-1 and A-2
Boring Logs by Earth Mechanics, Inc. (12 pages)
Boring Logs by LeRoy Crandall & Associates (8 pages)

E-mail to: [Winston.Stromberg@lw.com]

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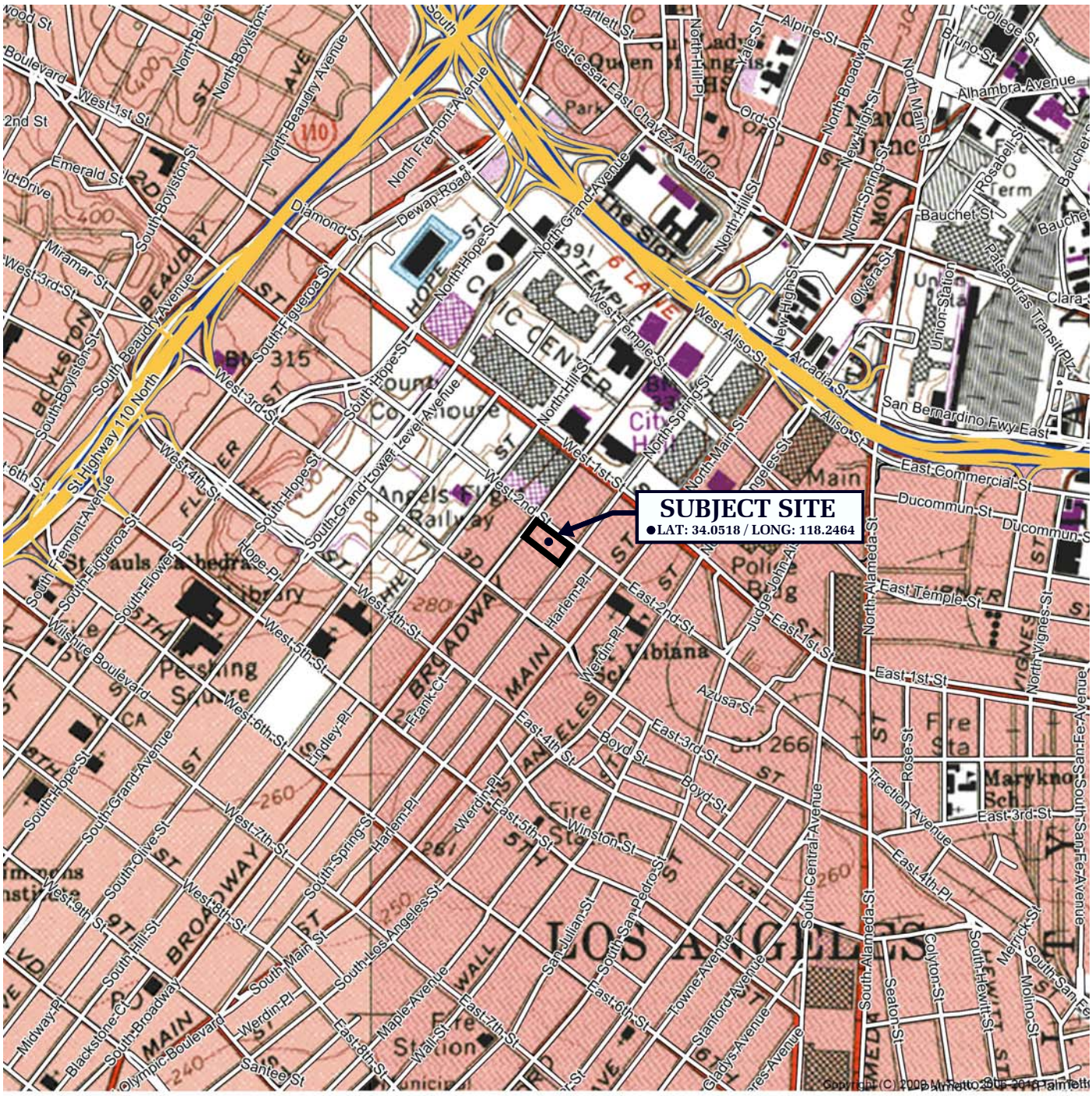


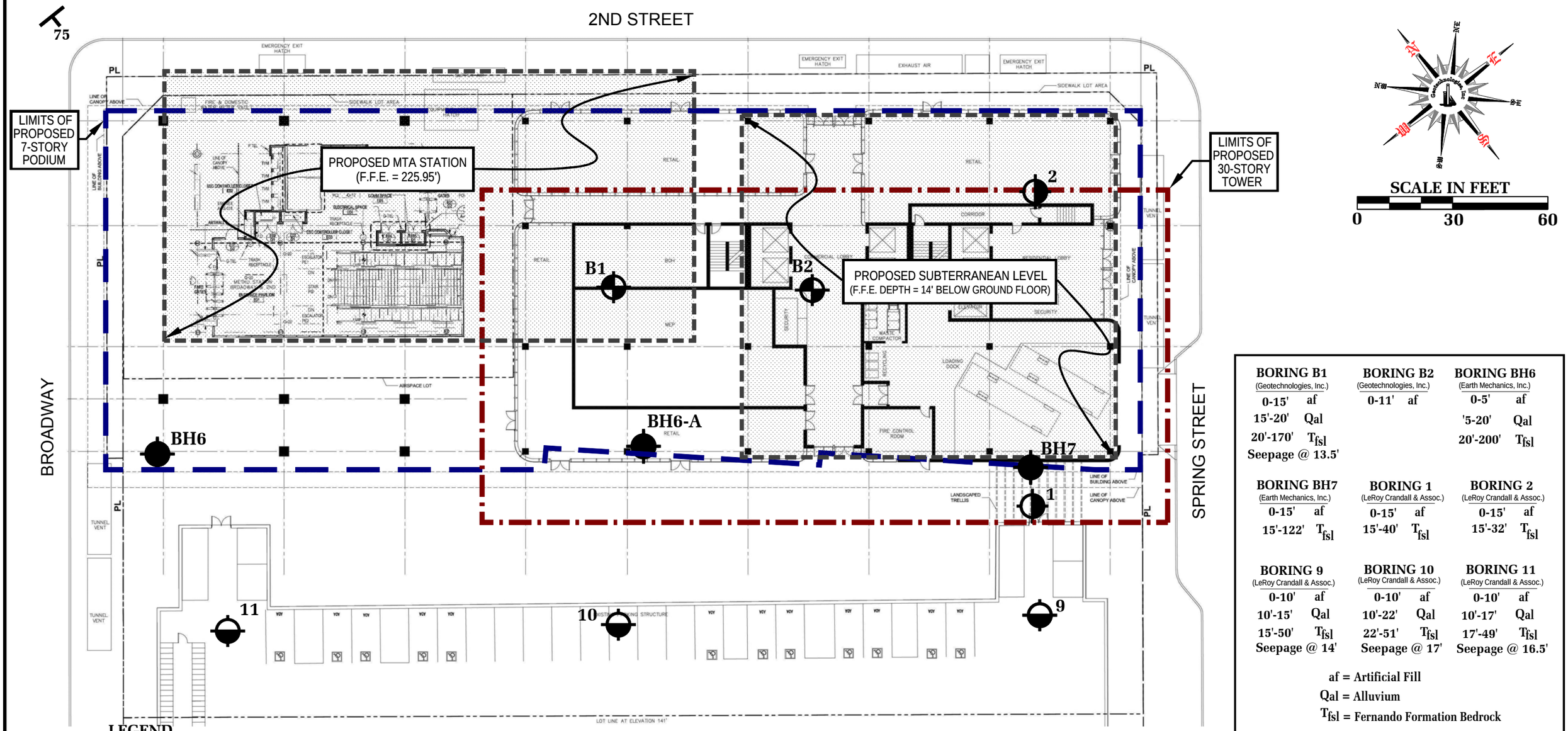
REFERENCE: U.S.G.S. TOPOGRAPHIC MAPS, 7.5 MINUTE SERIES, LOS ANGELES, CA QUADRANGLE

VICINITY MAP

Geotechnologies, Inc.
Consulting Geotechnical Engineers

TRIBUNE REAL ESTATE HOLDINGS, LLC

FILE NO. 21257



SCALE IN FEET

0 30 60

BORING B1 (Geotechnologies, Inc.)		BORING B2 (Geotechnologies, Inc.)		BORING BH6 (Earth Mechanics, Inc.)	
0-15'	af	0-11'	af	0-5'	af
15'-20'	Qal			'5-20'	Qal
20'-170'	T_{fsl}			20'-200'	T_{fsl}
Seepage @ 13.5'					

BORING BH7 (Earth Mechanics, Inc.)		BORING 1 (LeRoy Crandall & Assoc.)		BORING 2 (LeRoy Crandall & Assoc.)	
0-15'	af	0-15'	af	0-15'	af
15'-122'	T_{fsl}	15'-40'	T_{fsl}	15'-32'	T_{fsl}

BORING 9 (LeRoy Crandall & Assoc.)		BORING 10 (LeRoy Crandall & Assoc.)		BORING 11 (LeRoy Crandall & Assoc.)	
0-10'	af	0-10'	af	0-10'	af
10'-15'	Qal	10'-22'	Qal	10'-17'	Qal
15'-50'	T_{fsl}	22'-51'	T_{fsl}	17'-49'	T_{fsl}
Seepage @ 14'		Seepage @ 17'		Seepage @ 16.5'	

af = Artificial Fill
Qal = Alluvium
T_{fsl} = Fernando Formation Bedrock

LEGEND

- B2 — LOCATION & NUMBER OF BORING (This Investigation)
- BH7 — APPROXIMATE LOCATION & NUMBER OF BORING (Previous Investigation by Earth Mechanics, Inc., dated Frebruary 3, 2016)
- 11 — APPROXIMATE LOCATION & NUMBER OF BORING (Previous Investigation by LeRoy Crandall & Associates, dated May 27, 1987)
- 2 — APPROXIMATE LOCATION & NUMBER OF BORING (Previous Investigation by LeRoy Crandall & Associates., dated August 20, 1985)
- BH6-A — APPROXIMATE LOCATION OF GROUNDWATER MONITORING WELL (Previous Investigation by Earth Mechanics, Inc., dated Frebruary 3, 2016)
- 75 — CLOSEST BEDDING AND ORIENTATION SHOWN BY LAMAR (1970) FOR FERNANDO FORMATION BEDROCK

REFERENCE: GROUND FLOOR PLAN BY GENSLER DATED MAY 20, 2016

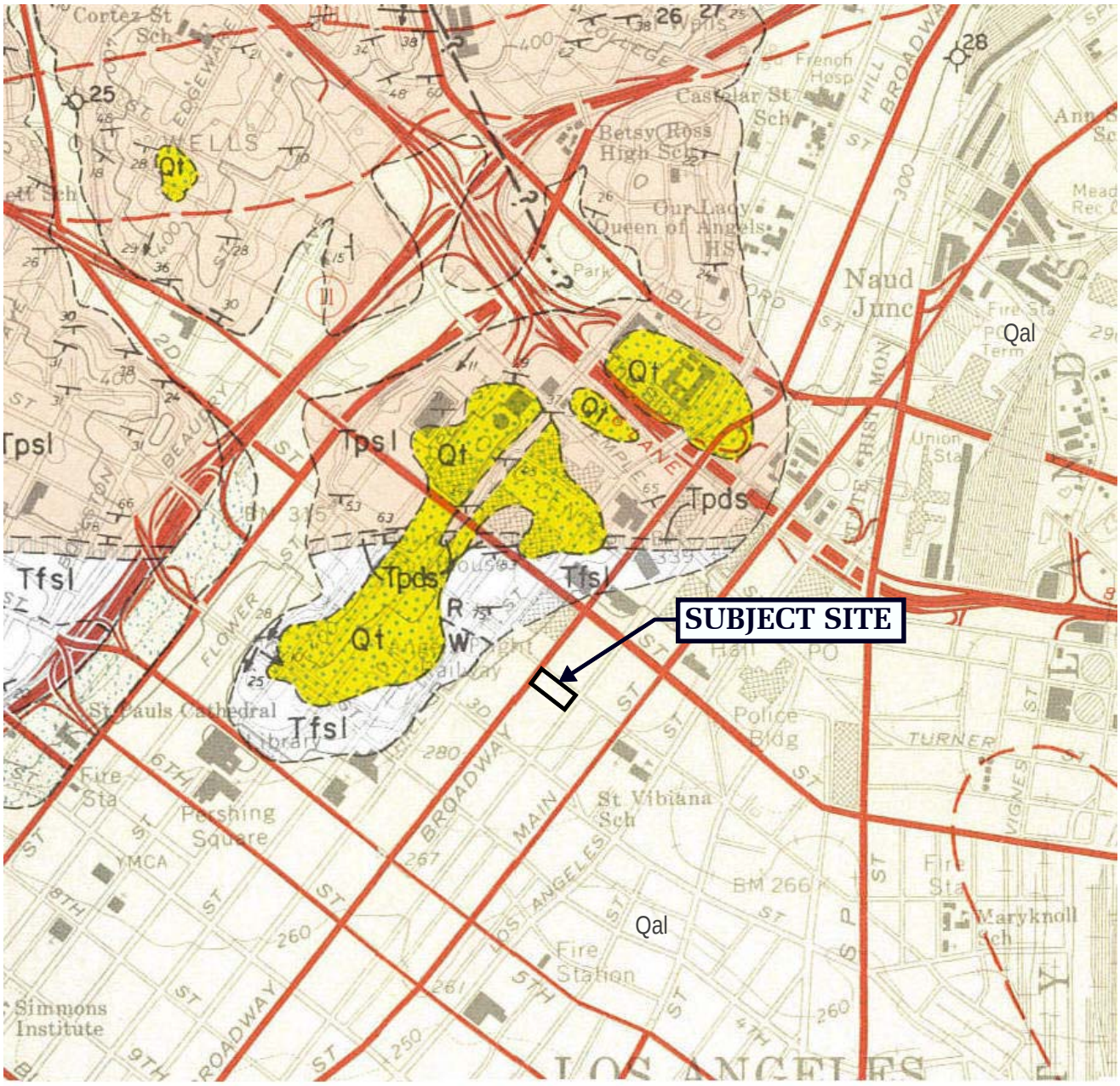
GEOLOGIC PLAN

Geotechnologies, Inc.
Consulting Geotechnical Engineers

TRIBUNE REAL ESTATE HOLDINGS, LLC

FILE No. 21257

DATE: August '16



LEGEND

Qal: Alluvium - Silt, sand and gravel

Qt: Terrace Deposits - Silt, sand and gravel forming alluvial terrace and dissected alluvila plain deposits

Tfsl: Fernando Formation - Siltstone, massive, light gray; R/W Repettian - Wheelerian Stage Boundary

Tpds: Puente Formation - Diatomaceous shale, punky, dull white

Tpsl: Puente Formation- Siltstone, well bedded, light brown and light gray

Tpss: Puente Formation- Sandstone, well bedded, medium-to coarse grained, light brown to gray

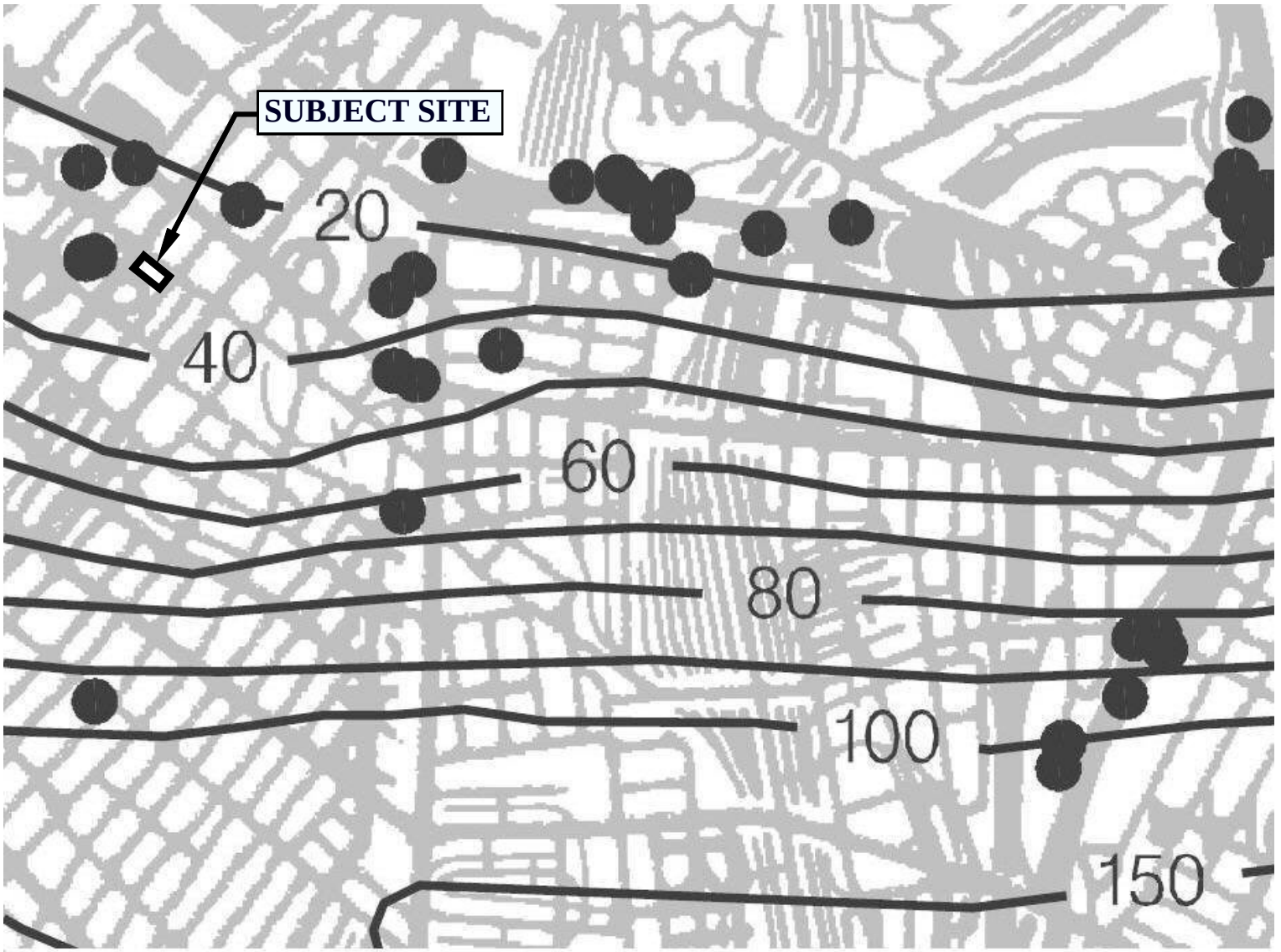
REFERENCE: LAMAR, GEOLOGIC MAP OF THE ELYSIAN PARK - REPETTO HILLS AREA, 1970, CDMG SR101

LOCAL GEOLOGIC MAP

Geotechnologies, Inc.
Consulting Geotechnical Engineers

TRIBUNE REAL ESTATE HOLDINGS, LLC

FILE NO. 21257



ONE MILE

SCALE

N

20 Depth to groundwater in feet

REFERENCE: CDMG, SEISMIC HAZARD EVALUATION REPORT 029
7.5 MINUTE QUADRANGLES, LOS ANGELES, CA QUADRANGLE (1998, Revised 2006)

HISTORICALLY HIGHEST GROUNDWATER LEVELS

Geotechnologies, Inc.
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TRIBUNE REAL ESTATE HOLDINGS, LLC

FILE No. 21257

SEISMIC SOURCE SUMMARY TABLE

Geotechnologies, Inc.
Tribune Real Estate Holdings, LLC
File No.: 21257

Based on USGS 2008 National Seismic Hazard Maps

Fault Name	Distance (Miles)	Preferred Dip (degrees)	Dip Direction	Slip Sense	Activity	Reference
Elysian Park (Upper)	1.25	50	NE	reverse	-	1
Puente Hills (LA)	3.94	27	N	thrust	-	1
Hollywood	4.51	70	N	strike slip	A (EFZ)	2
Santa Monica	4.54	44		strike slip	PA	2
Raymond	4.99	79	N	strike slip	A (EFZ)	2
Verdugo	7.19	55	NE	reverse	A	1,3
Newport-Inglewood	7.50	88		strike slip	A (EFZ)	2
Sierra Madre	11.43	53	N	reverse	A	3
Elsinore (Whittier)	11.99	81	NE	strike slip	A (EFZ)	2
Sierra Madre (San Fernando)	15.87	45	N	reverse	A (EFZ)	2
Malibu Coast	16.12	75	N	strike slip	A (EFZ)	2
Clamshell-Sawpit	16.58	50	NW	reverse	PA	3
Palos Verdes	17.08	90	V	strike slip	A	2
Anacapa-Dume	17.72	41	N	thrust	PA	3
San Gabriel	18.45	61	N	strike slip	A (EFZ)	2
Northridge	19.33	35	S	thrust	A	3
San Jose	21.05	74	NW	strike slip	-	1
Santa Susana	23.60	55	N	reverse	A	3
Chino	28.72	65	SW	strike slip		2
Cucamonga	30.06	45	N	reverse	A (EFZ)	2
San Joaquin Hills	30.45	23	SW	thrust	-	1
Holser	30.58	58	S	reverse	-	1
Simi-Santa Rosa	31.11	60		strike slip	A (EFZ)	2
San Andreas	34.23	90	V	strike slip	A (EFZ)	2
Oak Ridge	36.27	53		reverse	-	1
San Cayetano	39.70	42	N	thrust	A (EFZ)	2
San Jacinto	42.40	90	V	strike slip	-	1
Gleghorn	48.19	90	V	Strike Slip	-	1
Santa Ynez	52.27	70		strike slip	A	2
Ventura-Pitas Point	55.09	64	N	reverse	A (EFZ)	2
Pitas Point	55.09	55		reverse	A (EFZ)	2
Coronado Bank	56.47	90	V	Strike Slip	A	2
Channel Islands Thrust	58.41	20	N	thrust	-	1
Santa Cruz Island	58.42	90	V	strike slip	A	2
North Frontal	58.85	49	S	Reverse	A (EFZ)	2

Reference:

1 = United States Geological Survey

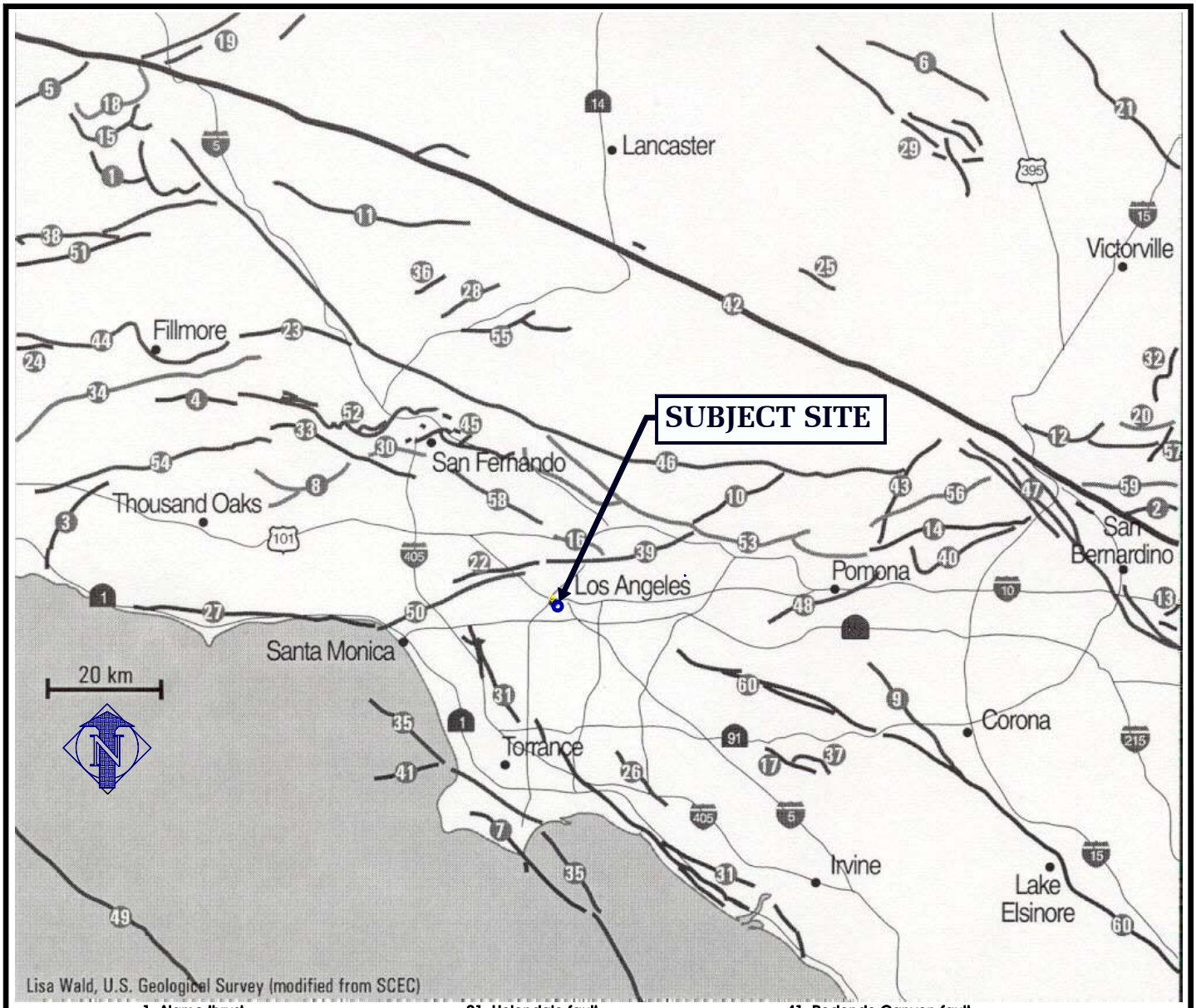
2 = California Geological Survey

3 = County of Los Angeles, Dept. of Public Works, 1990

A = Active

PA = Potentially Active

A (EFZ) = Active (Earthquake Fault Zone)



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

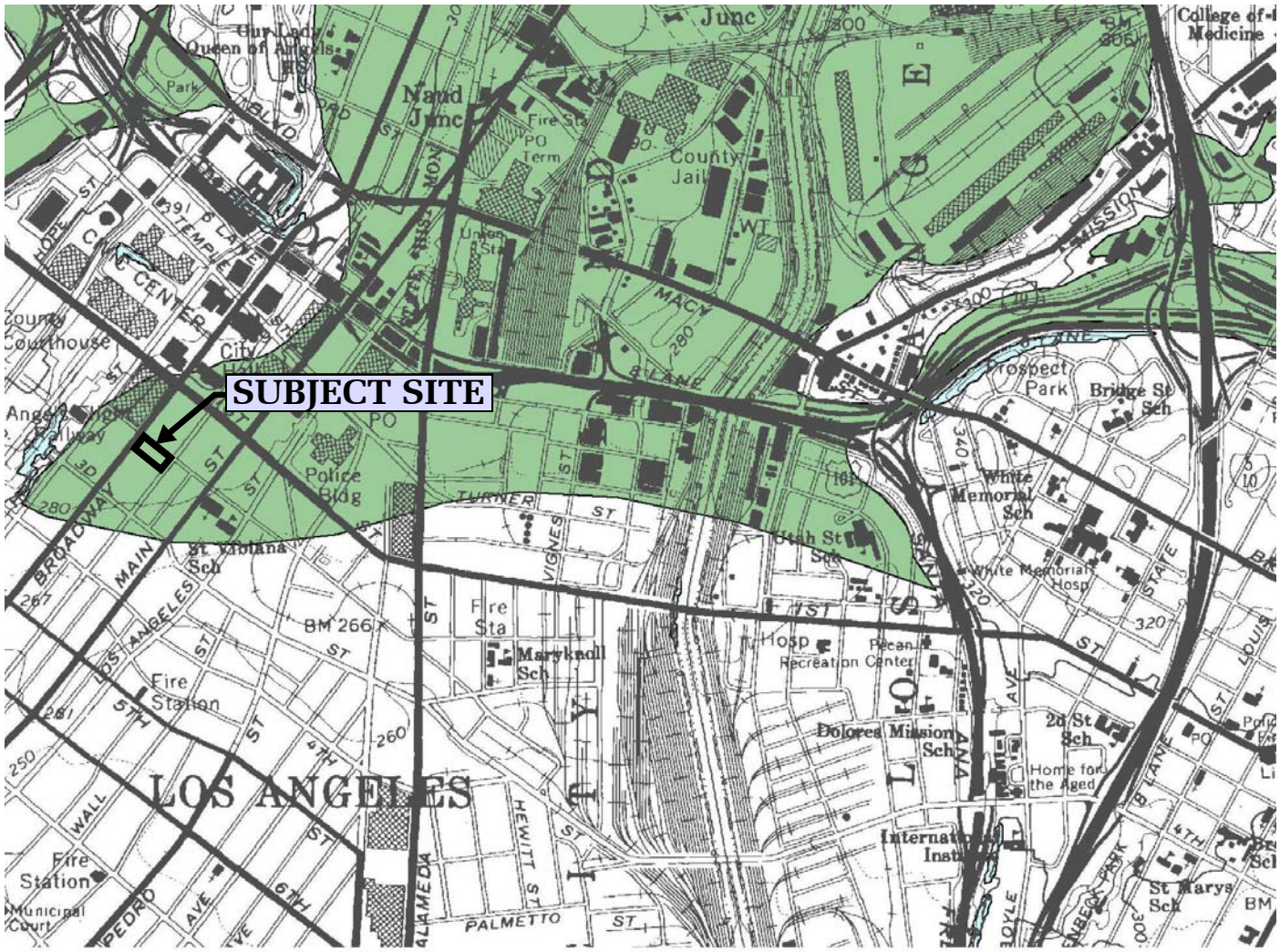
REFERENCE: http://pasadena.wr.usgs.gov/info/images/LA%20Faults.pdf

SOUTHERN CALIFORNIA FAULT MAP

Geotechnologies, Inc.
Consulting Geotechnical Engineers

TRIBUNE REAL ESTATE HOLDINGS, LLC

FILE NO. 21257



LIQUEFACTION AREA

N

Geotechnologies, Inc

REFERENCE: SEISMIC HAZARD ZONES
LOS ANGELES QUADRANGLES OFFICIAL MAPS (CDMG, 1999)

SEISMIC HAZARD ZONE MAP

Geotechnologies, Inc.
Consulting Geotechnical Engineers

TRIBUNE REAL ESTATE HOLDINGS, LLC

FILE NO. 21257

Methane Zone

Methane Buffer Zone

N

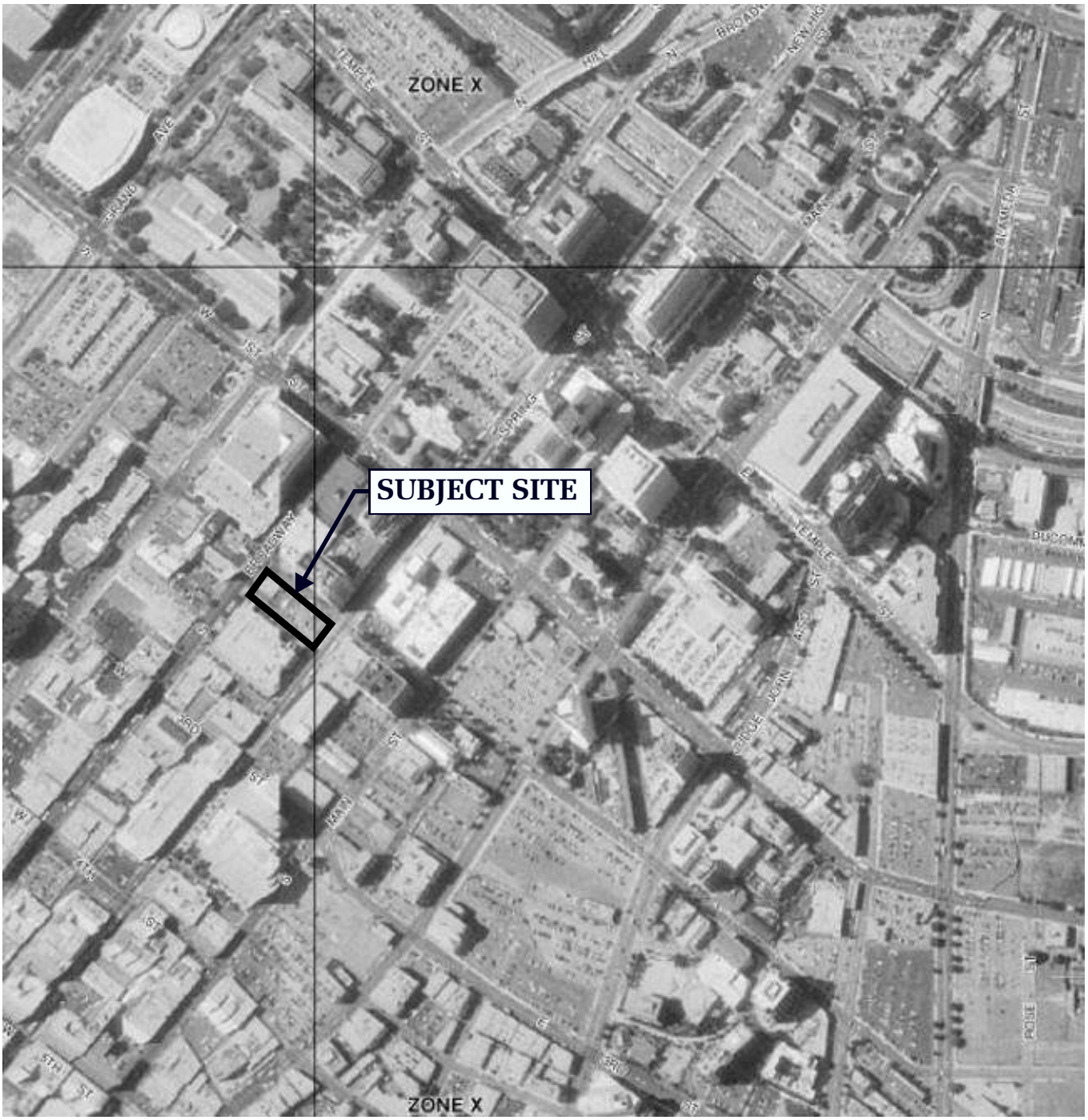
REFERENCE: http://navigatela.lacity.org/navigatela/

METHANE ZONE RISK MAP

Geotechnologies, Inc.
Consulting Geotechnical Engineers

TRIBUNE REAL ESTATE HOLDINGS, LLC

FILE NO. 21257



LEGEND

	OTHER AREAS
ZONE X	Areas determined to be outside the 0.2% annual chance floodplain.

REFERENCE: F.I.R.M. 06037C1636F
DATED 9/26/08

FLOOD INSURANCE RATE MAP

Geotechnologies, Inc.
Consulting Geotechnical Engineers

TRIBUNE REAL ESTATE HOLDINGS, LLC

FILE No. 21257

BORING LOG NUMBER 1

Tribune Real Estate Holdings, LLC **Date: 06/20/16** **Approximate Elevation: 287'**

File No. 21257 **Method: 8-inch Diameter Hollow Stem Auger**

ae

Sample Depth ft.	Blows per ft.	Moisture content %	Dry Density p.c.f.	Depth in feet	USCS Class.	Description Surface Conditions: Asphalt
				0 --		4-inch Asphalt over 7-inch Base
				-		
				1 --		
				-		FILL: Gravelly Silty Sand, brown, slightly moist to moist, medium dense, fine to coarse grained
				2 --		
2.5	23	2.7	109.7	-		
				3 --		
				-		
				4 --		
				-		
5	18	2.0	SPT	5 --		
				-		
				6 --		
				-		
				7 --		
7.5	24			-		
				8 --		
				-		
				9 --		
				-		
10	27			10 --		
				-		
				11 --		
				-		
				12 --		
				-		
				13 --		
				-		
				14 --		
				-		
15	33	8.2	SPT	15 --		
				-	SW	ALLUVIUM: Sand, gray, wet, medium dense, fine to coarse grained, abundant gravel
				16 --		
				-		
				17 --		
17.5	100/11"	4.8	140.4	-		
				18 --		very dense
				-		
				19 --		
				-		
20	28	12.8	SPT	20 --		
				-		BEDROCK (FERNANDO FORMATION): Siltstone, grayish brown, moist, firm, massive, weathered
				21 --		
				-		
22	50/5"			22 --		
				-		moderately hard, slightly moist, unweathered
				23 --		
				-		
				24 --		
				-		
25	54	27.2	SPT	25 --		
				-		

BORING LOG NUMBER 1

Tribune Real Estate Holdings, LLC

File No. 21257

ae

Sample Depth ft.	Blows per ft.	Moisture content %	Dry Density p.c.f.	Depth in feet	USCS Class.	Description
				26		
				27		
27.5	58			28		
				29		
30	31	28.5	SPT	30		dark grayish brown
				31		
				32		
32.5	50/5"	25.7	99.2	33		
				34		
35	34	24.4	SPT	35		
				36		
				37		
37.5	50/4"	25.3	100.7	38		
				39		
40	36	27.4	SPT	40		
				41		
				42		
42.5	70	26.1	102.3	43		
				44		
45	39	29.5	SPT	45		
				46		
				47		
47.5	100/7"	29.0	95.4	48		
				49		
50	38	27.7	SPT	50		

BORING LOG NUMBER 1

Tribune Real Estate Holdings, LLC

File No. 21257

ae

Sample Depth ft.	Blows per ft.	Moisture content %	Dry Density p.c.f.	Depth in feet	USCS Class.	Description
				51		
				52		
52.5	100/10"	25.2	99.6	53		
				54		
55	40	27.1	SPT	55		
				56		
				57		
57.5	100/8"	26.2	97.7	58		
				59		
60	36	25.3	SPT	60		
				61		
				62		
62.5	100/6"	26.8	98.4	63		
				64		
65	45	26.8	SPT	65		
				66		
				67		
67.5	50/55"	24.9	98.6	68		
				69		
70	43	23.9	SPT	70		
				71		
				72		
72.5	85	28.0	92.0	73		Claystone to Siltstone, hard
				74		
75	50	26.0	SPT	75		

BORING LOG NUMBER 1

Tribune Real Estate Holdings, LLC

File No. 21257

ae

Sample Depth ft.	Blows per ft.	Moisture content %	Dry Density p.c.f.	Depth in feet	USCS Class.	Description
				76		
				77		
77.5	50/3"	26.1	96.4	78		
				79		
80	47	26.0	SPT	80		Siltstone
				81		
82.5	100/9"	25.2	103.9	82		
				83		
				84		
85	56	26.1	SPT	85		
				86		
87.5	100/6"	28.7	93.4	87		
				88		
				89		
90	49	26.9	SPT	90		
				91		
92.5	100/7"	25.0	98.1	92		
				93		
				94		
95	45	25.2	SPT	95		
				96		
97.5	100/7"	24.6	98.1	97		
				98		
				99		
100	51	27.6	SPT	100		Siltstone to Claystone

BORING LOG NUMBER 1

Tribune Real Estate Holdings, LLC

File No. 21257

ae

Sample Depth ft.	Blows per ft.	Moisture content %	Dry Density p.c.f.	Depth in feet	USCS Class.	Description
				101		
				102		
102.5	50/3"	24.8	98.8	103		
				104		
105	50/5"	25.8	SPT	105		Claystone
				106		
				107		
107.5	100/7"	27.5	98.1	108		
				109		
110	61	25.2	SPT	110		Siltstone
				111		
				112		
112.5	60/6"			113		
				114		
115	67	25.0	SPT	115		
				116		
				117		
117.5	50/4"			118		
				119		
120	100/4"	25.9	97.3	120		
				121		
				122		
				123		
				124		
				125		

BORING LOG NUMBER 1

Tribune Real Estate Holdings, LLC

File No. 21257

ae

Sample Depth ft.	Blows per ft.	Moisture content %	Dry Density p.c.f.	Depth in feet	USCS Class.	Description
				- 126 -- - 127 -- - 128 -- - 129 -- -		
130	100/11"	26.4	106.3	130 -- - 131 -- - 132 -- - 133 -- - 134 -- - 135 -- - 136 -- - 137 -- - 138 -- - 139 -- -		Claystone
140	100	22.1	103.2	140 -- - 141 -- - 142 -- - 143 -- - 144 -- - 145 -- - 146 -- - 147 -- - 148 -- - 149 -- -		
150	100	24.5	100.7	150 -- -		Siltstone

BORING LOG NUMBER 1

Tribune Real Estate Holdings, LLC

File No. 21257

ae

Sample Depth ft.	Blows per ft.	Moisture content %	Dry Density p.c.f.	Depth in feet	USCS Class.	Description
				- 151 -- - 152 -- - 153 -- - 154 -- - 155 -- - 156 -- - 157 -- - 158 -- - 159 --		
160	100/9"	30.9	90.3	- 160 -- - 161 -- - 162 -- - 163 -- - 164 -- - 165 -- - 166 -- - 167 -- - 168 -- - 169 --		
170	50/2"	24.7	97.8	- 170 -- - 171 -- - 172-- - 173 -- - 174 -- - 175 -- -		**Total Depth 170 feet** **Water Seepage at 13.5 feet** **Fill to 15 feet** **NOTE: The stratification lines represent the approximate boundary between earth types; the transition may be gradual.** **Used 8-inch diameter Hollow-Stem Auger** **140-lb. Automatic Hammer, 30-inch drop** **Modified California Sampler used unless otherwise noted** **SPT=Standard Penetration Test**

BORING LOG NUMBER 2

Tribune Real Estate Holdings, LLC **Date: 07/18/16** **Approximate Elevation: 286'**

File No. 21257 **Method: 4-inch Diameter Hand Auger**

ae

Sample Depth ft.	Moisture content %	Dry Density p.c.f.	Depth in feet	USCS Class.	Description Surface Conditions: Asphalt
			0 --		3-inches Asphalt, No Base
			-		FILL: Silty Sand, grayish brown, moist, medium dense, fine
1	8.8	126.3	1 --		grained with fine gravel and cobbles
			-		
			2 --		
			-		light brown, pieces of brick
3	6.2	126.9	3 --		
			-		
			4 --		
			-		
5	4.0	115.9	5 --		
			-		
			6 --		
			-		
7	4.2	119.1	7 --		
			-		
			8 --		
			-		
			9 --		
			-		
10	3.4	111.7	10 --		
			-		large brick piece
			11 --		
			-		Refusal at 11 feet
			12 --		Fill to 11 feet
			-		No Water
			13 --		
			-		
			14 --		NOTE: The stratification lines represent the approximate
			-		boundary between earth types; the transition may be gradual.
			15 --		
			-		Used 4-inch diameter Hand-Augering Equipment; Hand Sampler
			16 --		
			-		
			17 --		
			-		
			18 --		
			-		
			19 --		
			-		
			20 --		
			-		
			21 --		
			-		
			22 --		
			-		
			23 --		
			-		
			24 --		
			-		
			25 --		
			-		

BORING LOGS BH6 AND BH7

BY EARTH MECHANICS, INC.

(12 pages)

LOGGED BY	BEGIN DATE	COMPLETION DATE	BOREHOLE LOCATION (Lat/Long or North/East and Datum)	HOLE ID
M. Hoshiyama	**10-21-14**	**10-24-14**	**N 1,841,381 E 6,486,917**	**BH-6**
DRILLING CONTRACTOR				SURFACE ELEVATION
Cascade				**288.0 ft**
DRILLING METHOD			DRILL RIG	BOREHOLE DIAMETER
Hollow-Stem Auger			**CME 75**	**8" (HSA), 4" (Coring)**
SAMPLER TYPE(S) AND SIZE(S) (ID)			SPT HAMMER TYPE	HAMMER EFFICIENCY, ERi
Mod Cal (2"), SPT (1.4")			**Auto-trip safety hammer - 140 lbs 30 in Drop**	**72%**
BOREHOLE BACKFILL AND COMPLETION			GROUNDWATER READINGS DURING DRILLING / AFTER DRILLING (DATE)	TOTAL DEPTH OF BORING
Cement Bentonite Slurry			**NE** / **NE**	**200.0 ft**

ELEVATION (ft)	DEPTH (ft)	Material Graphics	DESCRIPTION	Sample Location	Sample Number	Blows per 6 in.	Blows per foot	Recovery (%)	RQD (%)	Moisture Content (%)	Dry Unit Weight (pcf)	Shear Strength (tsf)	Drilling Method	Casing Depth	Remarks
	0		ASPHALT CONCRETE.												
	1		**ARTIFICIAL FILL (Af).** SILTY SAND (SM); brown; dry; few subrounded GRAVEL, max. 3/4 in. dia.; medium to fine SAND; little nonplastic fines; weak cementation.		0										
286.01	2														
	3														
284.01	4														
	5		SANDY lean CLAY (CL); very stiff to hard; dark brown; dry; few GRAVEL, max. 1/4 in. dia.; some fine SAND; nonplastic fines; cobbles fragments.		1	6 11 12	23	28							Rig chatter CR, PI
282.01	6														
	7														
280.01	8														
	9														
278.01	10		Poorly graded SAND with GRAVEL (SP); very dense; dark brown; dry; some angular GRAVEL, max. 2 in. dia.; medium to fine SAND; about 11% nonplastic fines; weak cementation; cobbles fragments.		2	47 50/3"		89							PA
	11														
276.01	12														
	13														
274.01	14														
	15		Well-graded GRAVEL with CLAY and SAND (GW-GC); very dense; brown and gray; moist; subangular GRAVEL, max. 3 in. dia.; little coarse to fine SAND; little nonplastic fines; weak cementation.		3	40 45 45	90	67							PA
272.01	16														
	17														
270.01	18														
	19														
268.01	20		**FERNANDO FORMATION (Tf).** SEDIMENTARY ROCK, (CLAYEY SILTSTONE), massive, moderately weathered, soft, poorly indurated. Olive gray; moist; trace fine SAND; about 4% low plasticity fines.		4	17 30 50	80	100							PP>4.5 tsf PA
	21														
266.01	22														
	23														
264.01	24														
	25														

(continued)

ELEVATION (ft)	DEPTH (ft)	Material Graphics	DESCRIPTION	Sample Location	Sample Number	Blows per 6 in.	Blows per foot	Recovery (%)	RQD (%)	Moisture Content (%)	Dry Unit Weight (pcf)	Shear Strength (tsf)	Drilling Method	Casing Depth	Remarks
	25		SEDIMENTARY ROCK, (CLAYEY SILTSTONE to SILTY CLAYSTONE), olive gray, moderately weathered, soft, poorly indurated, (moist).		5	7 17 23	40	100							PI
262.01	26														
	27														
260.01	28														
	29														
258.01	30				6	14 40 50	90	100							PP>4.5 tsf
	31														
256.01	32														
	33									25	98				PM
254.01	34														
	35				7	10 22 33	55	100							
252.01	36														
	37														
250.01	38														
	39														
248.01	40		Slightly weathered, soft to moderately soft.		8	17 40 50/4"		88							TV
	41														
246.01	42														
	43														
244.01	44														
	45				9	12 20 30	50	100							
242.01	46														
	47														
240.01	48														
	49														
238.01	50				10	22 50		100		26	98				
	51														
236.01	52														
	53														
234.01	54														
	55														

(continued)

Earth Mechanics, Inc.
Geotechnical and Earthquake Engineering

REPORT TITLE		HOLE ID
BORING RECORD		**BH-6**
PROJECT NAME		
Regional Connector Transit Corridor		
PREPARED BY	DATE	SHEET
DL/KT	**9-2-15**	**2 of 7**

ELEVATION (ft)	DEPTH (ft)	Material Graphics	DESCRIPTION	Sample Location	Sample Number	Blows per 6 in.	Blows per foot	Recovery (%)	RQD (%)	Moisture Content (%)	Dry Unit Weight (pcf)	Shear Strength (tsf)	Drilling Method	Casing Depth	Remarks
	55														
232.01	56		SEDIMENTARY ROCK, (CLAYEY SILTSTONE to SILTY CLAYSTONE), olive gray, slightly weathered, soft to moderately soft, poorly indurated, (moist).		11	12 21 30	51	100							
	57														
230.01	58														
	59														
228.01	60				12	27 50 50	100	100		24	102	3.80			UC
	61														
226.01	62														
	63														PM
224.01	64														
	65				13	22 50 80/6"		100							
222.01	66														
	67														
220.01	68														PM
	69														
218.01	70														No recovery
	71														
216.01	72		SEDIMENTARY ROCK, (CLAYEY SILTSTONE to SILTY CLAYSTONE), massive, dark gray, fresh, moderately soft, poorly indurated, unfractured from 72 ft to 77 ft (moist; low plasticity fines).		1			100	98	23	103	4.17			UC Start coring. Slough from 72 ft to 72.9 ft
	73														
214.01	74														
	75														
212.01	76														
	77		SEDIMENTARY ROCK, (Cemented SILTSTONE), massive, gray, hard, well indurated, cemented zone.		2			100	0						Hard drilling 77.0 ft to 77.5 ft. No Recovery from 77.0 ft to 79.4 ft
210.01	78		SEDIMENTARY ROCK.		3			13	0	23	100				
	79														
208.01	80		SEDIMENTARY ROCK, (CLAYEY SILTSTONE), massive, dark gray, fresh, moderately soft, poorly indurated, (moist; low plasticity fines).		4			34	32						CUTX CR
	81														Multiple attempts to retrieve sample
206.01	82														No recovery from 81.8 ft to 85 ft
	83														
204.01	84														
	85														

(continued)

Earth Mechanics, Inc.
Geotechnical and Earthquake Engineering

REPORT TITLE		HOLE ID
BORING RECORD		**BH-6**
PROJECT NAME		
Regional Connector Transit Corridor		
PREPARED BY	DATE	SHEET
DL/KT	**9-2-15**	**3 of 7**

ELEVATION (ft)	DEPTH (ft)	Material Graphics	DESCRIPTION	Sample Location	Sample Number	Blows per 6 in.	Blows per foot	Recovery (%)	RQD (%)	Moisture Content (%)	Dry Unit Weight (pcf)	Shear Strength (tsf)	Drilling Method	Casing Depth	Remarks
	85		SEDIMENTARY ROCK, (CLAYEY SILTSTONE), massive, dark gray, fresh, moderately soft, poorly indurated, (moist; low plasticity fines).		5			18	0						No recovery from 85 ft to 90 ft
202.01	86														
	87														
200.01	88														Limited Recovery. Multiple attempts to retrieve sample.Sample deformed
	89														
198.01	90														Drilled out fro pressuremeter test. No recovery from 90 ft to 95 ft
	91														
196.01	92														
	93														
194.01	94				6			0	0						
	95				7			60	0						No recovery from 95 ft to 96 ft
192.01	96														
	97									27	101				Sample deformed. Rock fragments in core sample
190.01	98														
	99														
188.01	100		SEDIMENTARY ROCK, (Cemented SILTSTONE), massive, gray, hard, moderately to intensely fractured, well indurated, cemented zone.		8			100	0						
	101														
186.01	102														
	103														
184.01	104				9			38	0						
	105														
182.01	106		SEDIMENTARY ROCK, (CLAYEY SILTSTONE), massive, dark gray, fresh, moderately soft, poorly indurated, (low plasticity fines). Slightly fractured from 107 ft to 110 ft.		10			75	25						No recovery from 106 ft to 107 ft
	107														
180.01	108														
	109														
178.01	110									28	96	2.70			UC
					11			0	0						No recovery from 110 ft to 115 ft. Multiple attempts to retrieve sample failed.
	111														
176.01	112														
	113														
174.01	114														
	115														

(continued)

Earth Mechanics, Inc.
Geotechnical and Earthquake Engineering

REPORT TITLE		HOLE ID
BORING RECORD		**BH-6**
PROJECT NAME		
Regional Connector Transit Corridor		
PREPARED BY	DATE	SHEET
DL/KT	**9-2-15**	**4 of 7**

ELEVATION (ft)	DEPTH (ft)	Material Graphics	DESCRIPTION	Sample Location	Sample Number	Blows per 6 in.	Blows per foot	Recovery (%)	RQD (%)	Moisture Content (%)	Dry Unit Weight (pcf)	Shear Strength (tsf)	Drilling Method	Casing Depth	Remarks
	115		SEDIMENTARY ROCK, (CLAYEY SILTSTONE).		12			0	0						No recovery from 115 ft to 125 ft. Multiple attempts to retrieve sample failed.
172.01	116														
	117														
170.01	118														
	119														
168.01	120				13			0	0						
	121														
166.01	122														
	123														
164.01	124														
	125		(CLAYEY SILTSTONE), massive, dark gray, fresh, moderately soft to moderately hard, poorly to moderately indurated, (moist; low plasticity fines).		14			70	0						No recovery from 125' to 126 ft.
162.01	126														Sample deformed from 126 ft to 130 ft. Deformation due to sloughed cemented SILTSTONE fragments in borehole
	127									27	101				
160.01	128														
	129														
158.01	130				15			100	0						Sample deformed from 130 ft to 135 ft
	131														
156.01	132														
	133														
154.01	134														
	135				16			54	0						No recovery from 135 ft to 137.2 ft
152.01	136														
	137														Sample deformed from 137.2 ft to 140 ft
150.01	138														
	139														
148.01	140				17			16	0						No recovery from 140 ft to 144.2 ft
	141														
146.01	142														
	143														
144.01	144									29	95				Sample deformed from 144.2 ft to 145 ft
	145														

(continued)

Earth Mechanics, Inc.
Geotechnical and Earthquake Engineering

REPORT TITLE: **BORING RECORD**

HOLE ID: **BH-6**

PROJECT NAME: **Regional Connector Transit Corridor**

PREPARED BY: **DL/KT**

DATE: **9-2-15**

SHEET: **5 of 7**

ELEVATION (ft)	DEPTH (ft)	Material Graphics	DESCRIPTION	Sample Location	Sample Number	Blows per 6 in.	Blows per foot	Recovery (%)	RQD (%)	Moisture Content (%)	Dry Unit Weight (pcf)	Shear Strength (tsf)	Drilling Method	Casing Depth	Remarks
	145		SEDIMENTARY ROCK, (CLAYEY SILTSTONE), massive, dark gray, fresh, moderately soft to moderately hard, poorly indurated, (high plasticity fines).		18			30	0						No recovery from 145 ft to 147 ft
142.01	146														
	147														Consolidation tests at 147 ft to 148.5 ft
140.01	148														Sample deformed from 149 ft to 150 ft
	149														
138.01	150		Moderately hard, unfractured from 150 ft to 155 ft, moderately indurated.		19			100	95	25	100	2.68			UC
	151														
136.01	152														
	153														
134.01	154														
	155				20			94	94						
132.01	156		Unfractured from 155.3 ft to 156 ft.												
	157														
130.01	158														
	159														
128.01	160		Unfractured from 160 ft to 164 ft.		21			100	100						
	161														
126.01	162														
	163														
124.01	164		Slightly fractured from 164 ft to 165 ft.												
	165		Unfractured from 165 ft to 170 ft.		22			100	100						
122.01	166														
	167														
120.01	168														
	169														
118.01	170		Unfractured from 170 ft to 175 ft.		23			100	100	26	97				
	171														
116.01	172														
	173														
114.01	174														
	175														

(continued)

Earth Mechanics, Inc.
Geotechnical and Earthquake Engineering

REPORT TITLE		HOLE ID
BORING RECORD		**BH-6**
PROJECT NAME		
Regional Connector Transit Corridor		
PREPARED BY	DATE	SHEET
DL/KT	**9-2-15**	**6 of 7**

ELEVATION (ft)	DEPTH (ft)	Material Graphics	DESCRIPTION	Sample Location	Sample Number	Blows per 6 in.	Blows per foot	Recovery (%)	RQD (%)	Moisture Content (%)	Dry Unit Weight (pcf)	Shear Strength (tsf)	Drilling Method	Casing Depth	Remarks
	175		SEDIMENTARY ROCK, (CLAYEY SILTSTONE), massive, dark gray, fresh, moderately hard, moderately fractured, unfractured from 175 ft to 180 ft, poorly indurated, (moist; low plasticity fines).		24			100	100	27	95	1.96			UC
112.01	176														
	177														
110.01	178														
	179														
108.01	180				25			73	73						No recovery from 180 ft to 181.3 ft.
	181		Unfractured from 181.3 ft to 185 ft.												
106.01	182														
	183		Unfractured from 183.3 ft to 185 ft.												
104.01	184														
	185		Unfractured from 185 ft to 190 ft.		26			100	100						
102.01	186														
	187														
100.01	188														
	189														
98.01	190		Unfractured from 190 ft to 195 ft.		27			100	100						
	191														
96.01	192														
	193														
94.01	194														
	195		Unfractured from 195 ft to 200 ft.		28			100	100	26	97	3.32			UC
92.01	196														
	197														
90.01	198														
	199														
88.01	200		Bottom of borehole at 200.0 ft bgs No groundwater encountered during drilling.												
	201														
86.01	202														
	203														
84.01	204														
	205														

Earth Mechanics, Inc.
Geotechnical and Earthquake Engineering

REPORT TITLE		HOLE ID
BORING RECORD		**BH-6**
PROJECT NAME		
Regional Connector Transit Corridor		
PREPARED BY	DATE	SHEET
DL/KT	**9-2-15**	**7 of 7**

LOGGED BY	BEGIN DATE	COMPLETION DATE	BOREHOLE LOCATION (Lat/Long or North/East and Datum)	HOLE ID
Chavin	**10-15-14**	**10-20-14**	**N 1,841,221 E 6,487,122**	**BH-7**
DRILLING CONTRACTOR				SURFACE ELEVATION
Cascade				**285.4 ft**
DRILLING METHOD		DRILL RIG		BOREHOLE DIAMETER
Hollow-Stem Auger		**CME 75**		**8" (HSA), 4" (Coring)**
SAMPLER TYPE(S) AND SIZE(S) (ID)		SPT HAMMER TYPE		HAMMER EFFICIENCY, ERi
Bulk, Mod Cal (2"), SPT (1.4")		**Auto-trip safety hammer - 140 lbs 30 in Drop**		**72%**
BOREHOLE BACKFILL AND COMPLETION		GROUNDWATER READINGS DURING DRILLING	AFTER DRILLING (DATE)	TOTAL DEPTH OF BORING
Cement Bentonite Slurry		**NE**	**NE**	**122.0 ft**

ELEVATION (ft)	DEPTH (ft)	Material Graphics	DESCRIPTION	Sample Location	Sample Number	Blows per 6 in.	Blows per foot	Recovery (%)	RQD (%)	Moisture Content (%)	Dry Unit Weight (pcf)	Shear Strength (tsf)	Drilling Method	Casing Depth	Remarks
	0		ASPHALT CONCRETE 4" Approx. No base.		0										CR, PA
	1		**ARTIFICIAL FILL (Af).** SILTY SAND (SM); yellowish brown; moist; about 2% GRAVEL, max. 3/4 in. dia.; about 81% medium to fine SAND; about 17% nonplastic fines; weak cementation.												
283.37	2														
	3														
281.37	4														
	5		Very dense; some nonplastic fines.		1	3 18 35	53	100							PA
279.37	6														
	7														
277.37	8														
	9														
275.37	10		Medium dense; trace lean CLAY.		2	5 16 12	28	100		8	113				DS
	11														
273.37	12														
	13														
271.37	14														
	15		**FERNANDO FORMATION (Tf).** SEDIMENTARY ROCK, (CLAYEY SILTSTONE to Silty CLAYSTONE), massive, olive gray, intensely to moderately weathered, very soft to soft, poorly indurated. Moist; trace fine SAND; nonplastic to low plasticity fines.		3	4 7 13	20	100							
269.37	16														
	17														
267.37	18														
	19														
265.37	20		Moderately weathered, soft.		4	17 50/3"		100		20	101	1.84			TV=1.05 tsf UC
	21														
263.37	22														
	23														
261.37	24														
	25														

(continued)

Earth Mechanics, Inc.
Geotechnical and Earthquake Engineering

REPORT TITLE		HOLE ID
BORING RECORD		**BH-7**
PROJECT NAME		
Regional Connector Transit Corridor		
PREPARED BY	DATE	SHEET
DL/KT	**9-2-15**	**1 of 5**

ELEVATION (ft)	DEPTH (ft)	Material Graphics	DESCRIPTION	Sample Location	Sample Number	Blows per 6 in.	Blows per foot	Recovery (%)	RQD (%)	Moisture Content (%)	Dry Unit Weight (pcf)	Shear Strength (tsf)	Drilling Method	Casing Depth	Remarks
	25		Moist; trace fine SAND; nonplastic to low plasticity fines.		5	14 20 30	50	100							PA, PI
259.37	26														
	27														
257.37	28														
	29														
255.37	30				6	12 30 43	73	100		25	104				TV=0.82 tsf TV Pressuremeter test was performed.
	31														
253.37	32														
	33														
251.37	34														
	35				7	6 18 47	65	100							PI
249.37	36														
	37														
247.37	38														
	39														
245.37	40				8	16 46 50	96	100		38	79	4.48			UC
	41														
243.37	42		(CLAYEY SILTSTONE), massive, olive gray, slightly weathered, soft to moderately soft, slightly fractured from 41.5 ft to 45 ft, poorly indurated, (moist, low plasticity fines).		1			100	86						
	43														
241.37	44														
	45		Unfractured from 45 ft to 50 ft.		2			100	100						
239.37	46														
	47														
237.37	48														
	49														
235.37	50		Slightly fractured from 50.3 ft to 55 ft.		3			95	83						No recovery from 50 ft to 50.3 ft
	51														
233.37	52														
	53														
231.37	54														
	55														

(continued)

Earth Mechanics, Inc.
Geotechnical and Earthquake Engineering

REPORT TITLE: **BORING RECORD**

HOLE ID: **BH-7**

PROJECT NAME: **Regional Connector Transit Corridor**

PREPARED BY: **DL/KT**

DATE: **9-2-15**

SHEET: **2 of 5**

ELEVATION (ft)	DEPTH (ft)	Material Graphics	DESCRIPTION	Sample Location	Sample Number	Blows per 6 in.	Blows per foot	Recovery (%)	RQD (%)	Moisture Content (%)	Dry Unit Weight (pcf)	Shear Strength (tsf)	Drilling Method	Casing Depth	Remarks
	55		SEDIMENTARY ROCK, (CLAYEY SILTSTONE), massive, olive gray, slightly weathered to fresh, soft to moderately soft, slightly unfractured from 55 ft to 59.2 ft, poorly indurated.		4			84	68						
229.37	56														
	57														
227.37	58														
	59														No recovery from 59.2 ft to 60 ft
225.37	60							0	0						PM Modified California Sampler driven from 60 ft to 64 ft for pressurementer test
	61														
223.37	62														No recovery
	63														
221.37	64							100	100						
	65		Very slightly fractured from 65 ft to 70 ft.		5			100	95						
219.37	66														
	67														
217.37	68														
	69														
215.37	70				6			100	94						
	71														
213.37	72		SEDIMENTARY ROCK, (Cemented SILTSTONE), gray, hard, well indurated, cemented zone.									1.03			UC
	73		SEDIMENTARY ROCK.												
211.37	74									26	96				
	75		SEDIMENTARY ROCK, (CLAYEY SILTSTONE), massive, dark gray, fresh, moderately soft, unfractured from 75 ft to 80 ft, poorly indurated.		7			100	100						Sample recovery required multiple attempts.
209.37	76														
	77														
207.37	78														
	79														
205.37	80		Unfractured from 80 ft to 85 ft.		8			100	100						
	81														
203.37	82														
	83														
201.37	84														
	85														

(continued)

Earth Mechanics, Inc.
Geotechnical and Earthquake Engineering

REPORT TITLE			HOLE ID
BORING RECORD			**BH-7**
PROJECT NAME			
Regional Connector Transit Corridor			
PREPARED BY	DATE		SHEET
DL/KT	**9-2-15**		**3 of 5**

ELEVATION (ft)	DEPTH (ft)	Material Graphics	DESCRIPTION	Sample Location	Sample Number	Blows per 6 in.	Blows per foot	Recovery (%)	RQD (%)	Moisture Content (%)	Dry Unit Weight (pcf)	Shear Strength (tsf)	Drilling Method	Casing Depth	Remarks
	85		SEDIMENTARY ROCK, (CLAYEY SILTSTONE), massive, dark gray, fresh, moderately soft, poorly indurated, unfractured from 85 ft to 90 ft, (moist; trace fine SAND; nonplastic to low plasticity fines).		9			100	100						
199.37	86														
	87														
197.37	88														
	89														CUTX, CR at 89 ft to 90 ft
195.37	90									26	99				
	91							0	0						PM Drilled out from 90.5 ft to 95 ft Pressuremeter test
193.37	92														
	93														
191.37	94														
	95		Unfractured from 95 ft to 98 ft.		10			0	60						
189.37	96														
	97														
187.37	98														No recovery from 95 ft to 100 ft
	99														
185.37	100		Unfractured from 100 ft to 105 ft.		11			100	100						
	101														
183.37	102														
	103														
181.37	104														
	105		Unfractured from 105 ft to 110 ft.		12A			100	100						Multiple attempts to retrieve sample
179.37	106														
	107														
177.37	108														
	109														
175.37	110		Moderately fractured from 110 ft to 111 ft.		12B			100	0						
	111		Unfractured from 111 ft to 114.8 ft.		13A			96	96						
173.37	112														
	113														
171.37	114														
	115														

(continued)

Earth Mechanics, Inc.
Geotechnical and Earthquake Engineering

REPORT TITLE: **BORING RECORD**

HOLE ID: **BH-7**

PROJECT NAME: **Regional Connector Transit Corridor**

PREPARED BY: **DL/KT**

DATE: **9-2-15**

SHEET: **4 of 5**

ELEVATION (ft)	DEPTH (ft)	Material Graphics	DESCRIPTION	Sample Location	Sample Number	Blows per 6 in.	Blows per foot	Recovery (%)	RQD (%)	Moisture Content (%)	Dry Unit Weight (pcf)	Shear Strength (tsf)	Drilling Method	Casing Depth	Remarks
	115														
169.37	116		SEDIMENTARY ROCK, (CLAYEY SILTSTONE), massive, olive gray, fresh, moderately soft, poorly indurated. Unfractured from 115 ft to 116.6 ft.		13B			83	83						No recovery from 114.8 ft to 115 ft
	117		Unfractured from 117 ft to 122 ft.		14			100	100						No recovery from 116.6 ft to 117 ft Consolidation test at 117 ft to 118.5 ft
167.37	118														
	119														
165.37	120														
	121														
163.37	122		Bottom of borehole at 122.0 ft bgs No groundwater encountered during drilling.												
	123														
161.37	124														
	125														
159.37	126														
	127														
157.37	128														
	129														
155.37	130														
	131														
153.37	132														
	133														
151.37	134														
	135														
149.37	136														
	137														
147.37	138														
	139														
145.37	140														
	141														
143.37	142														
	143														
141.37	144														
	145														

Earth Mechanics, Inc.
Geotechnical and Earthquake Engineering

REPORT TITLE		HOLE ID
BORING RECORD		**BH-7**
PROJECT NAME		
Regional Connector Transit Corridor		
PREPARED BY	DATE	SHEET
DL/KT	**9-2-15**	**5 of 5**

BORING LOGS 1, 2, 9, 10 AND 11

BY LEROY CRANDALL & ASSOCIATES

(8 pages)

BORING 1

DATE DRILLED: July 13 & 15, 1985

EQUIPMENT USED: 24"-Diameter Bucket

ELEVATION 283.3*

ELEVATION (ft.)	DEPTH (ft.)	"N" VALUE STD. PEN. TEST	MOISTURE (% of dry wt.)	DRY DENSITY (lbs./cu. ft.)	DRIVE ENERGY (ft.-kips/ft.)	SAMPLE LOC.	
280	0		30.9	85	2	SM	3" Asphaltic Paving - 4" Base Course FILL - SILTY SAND - fine to medium, pieces of brick, pipe, and metal, light brown
	5		14.2	97	2		Layer of brick Light grey
275	10		6.7	133	26	SM	SILTY SAND - fine to medium, some gravel, brown (POSSIBLY FILL) Petroleum odor
270	15		32.1	89	6		SILTSTONE - weathered, greyish-brown
265	20		27.6	96	15		SILTSTONE - dark grey
260	25		25.3	98	6		
255	30		24.8	101	11		
250	35		26.0	98	13		
245	40		25.7	99	11		

NOTE: Water not encountered. Heavy caving from 2' to 10' (to 7' in diameter).

*Elevations refer to datum of reference survey; see Plate 1.

NOTE: THE LOG OF SUBSURFACE CONDITIONS SHOWN HEREON APPLIES ONLY AT THE SPECIFIC BORING LOCATION AND AT THE DATE INDICATED. IT IS NOT WARRANTED TO BE REPRESENTATIVE OF SUBSURFACE CONDITIONS AT OTHER LOCATIONS AND TIMES.

2340-03-JO485

LOG OF BORING

LeROY CRANDALL AND ASSOCIATES

PLATE A-1.1

BORING 2

DATE DRILLED: July 13, 1985

EQUIPMENT USED: 24"-Diameter Bucket

ELEVATION 283.3

ELEVATION (ft.)	DEPTH (ft.)	"N" VALUE STD. PEN. TEST	MOISTURE (% of dry wt.)	DRY DENSITY (lbs./cu. ft.)	DRIVE ENERGY (ft.-kips/ft.)	SAMPLE LOC.
280	0		7.6	107	5	SM
	5		8.5	112	5	
275			6.6	109	5	
	10		12.8	99	13	SM
270			6.7	127	36	
	15		31.7	87	5	
265						
	20		26.3	99	4	
260						
	25		24.6	99	4	
255						
	30		25.9	98	8	
250						
	35					

3" Asphaltic Paving

FILL - SILTY SAND - fine to medium, some gravel, pieces of brick and wire, greyish-brown

Pieces of concrete and asphaltic paving

Some plaster

SILTY SAND - fine to coarse, some gravel and cobbles, dark greyish-brown (POSSIBLY FILL)

(USED GAD, CHOPPING BUCKET, AND ROCK BUCKET AT 10')

Petroleum odor

SILTSTONE - dark grey

Shell

Cemented layer

(BORING TERMINATED DUE TO HARD LAYER)

NOTE: Water not encountered. Raveling from 0' to 15'.

NOTE: THE LOG OF SUBSURFACE CONDITIONS SHOWN HEREON APPLIES ONLY AT THE SPECIFIC BORING LOCATION AND AT THE DATE INDICATED. IT IS NOT WARRANTED TO BE REPRESENTATIVE OF SUBSURFACE CONDITIONS AT OTHER LOCATIONS AND TIMES.

LOG OF BORING

LeROY CRANDALL AND ASSOCIATES

PLATE A-1.2

BORING 9

DATE DRILLED: May 2, 1987
EQUIPMENT USED: 24"-Diameter Bucket 0' to 14-1/2'
20"-Diameter Bucket below 14-1/2'
ELEVATION 282 *

JOB A-85091-B DATE 5/12/87 F.T. TC DR. dmh O.E. MD W.P. dmh CHKD

Note : The log of subsurface conditions shown hereon applies only at the specific boring location and at the date indicated. It is not warranted to be representative of subsurface conditions at other locations and times.

ELEVATION (ft.)	DEPTH (ft.)	MOISTURE (% of dry wt.)	DRY DENSITY (lbs./cu. ft.)	DRIVE ENERGY (ft.-kips/ft.)	SAMPLE LOC.	
280						5" Asphaltic Paving - 4" Base Course
		16.0	110	2		ML FILL - SANDY SILT - some Gravel with Cobbles and Boulders, pieces of concrete and brick, brown
	5					
		30.2	77	< 1		Patches of Clayey Silt
275						Large amount of brick
	10					4" concrete slab
		5.1	138	23		SW GRAVELLY SAND - well graded, some fines, about 20% Gravel with Cobbles (to 8" in size), brown
270						
	15	29.3	96	8		SILTSTONE - bedded, weathered, light brown
265		27.0	97	8		SILTSTONE - dark grey
	20	27.1	95	8		
260						
		26.2	100	10		
	25					
255		25.7	99	7		
	30	26.1	101	7		
250						
	35	29.2	94	9		
245						
	40	26.4	98	8		

* Elevations refer to datum of reference survey; see Plate 1.

(CONTINUED ON FOLLOWING PLATE)

LOG OF BORING

LeROY CRANDALL AND ASSOCIATES

PLATE A - 1.9a

JOB A-85091-8 DATE 5/12/87 F.T. TC DR. dmh O.E. MD W.P. dmh CHKD MS

Note: The log of subsurface conditions shown hereon applies only at the specific boring location and at the date indicated. It is not warranted to be representative of subsurface conditions at other locations and times.

BORING 9 (Continued)

DATE DRILLED: May 2, 1987
EQUIPMENT USED: 24"-Diameter Bucket 0' to 14-1/2'
20"-Diameter Bucket below 14-1/2'

ELEVATION (ft.)	DEPTH (ft.)		MOISTURE (% of dry wt.)	DRY DENSITY (lbs./cu. ft.)	DRIVE ENERGY (ft.-kips/ft.)	SAMPLE LOC.
240						
	45		27.7	96	7	
235						
	50		22.5	101	13	
230						
	55					

NOTE: Slight water seepage encountered at a depth of 14'.
Raveling from 0' to 10'.

LOG OF BORING

LeROY CRANDALL AND ASSOCIATES

PLATE A-1.9b

BORING 10

DATE DRILLED: May 2, 1987
EQUIPMENT USED: 24"-Diameter Bucket 0' to 24'
20"-Diameter Bucket below 24'
ELEVATION 286

ELEVATION (ft.)	DEPTH (ft.)	MOISTURE (% of dry wt.)	DRY DENSITY (lbs /cu. ft.)	DRIVE ENERGY (ft.-kips/ft.)	SAMPLE LOC.		
285							5" Asphaltic Paving FILL - DEBRIS - mostly brick with Silt and Clay, brown
		23.1	103	< 1		SM CL	FILL - SILTY SAND and SILTY CLAY - reddish brown
280	5	19.2	109	5		CL	SANDY CLAY (POSSIBLY FILL) - dark grey
		6.8	125	6		SM	SILTY SAND (POSSIBLY FILL) - fine, some Clay, brown
275	10	7.5	125	26		SW	GRAVELLY SAND - well graded, about 15% Gravel with Cobbles (to 8" in size), some fines, brown
270	15	9.8	115	30			Strong petroleum odor
		9.7	129	30			About 20% Gravel
265	20	29.2	96	20			SILTSTONE - bedded, weathered, brown
		24.8	99	12			SILTSTONE - dark brown
260	25	25.7	95	12			
255	30	25.6	98	10			
250	35	25.8	100	9			Cemented layer
	40	25.9	96	8			

Note : The log of subsurface conditions shown hereon applies only at the specific boring location and at the date indicated. It is not warranted to be representative of subsurface conditions at other locations and times.

JOB A-85091-B DATE 5/12/87 F.T. TC DR. dmh O.E. MD W.P. dmh CHKD

(CONTINUED ON FOLLOWING PLATE)

LOG OF BORING

LeROY CRANDALL AND ASSOCIATES

PLATE A - 1.10a

JOB A-85091-B DATE 5/12/87 F.T. TC DR. dmh O.E. WD 24 W.P. dmh CHKD

Note : The log of subsurface conditions shown hereon applies only at the specific boring location and at the date indicated. It is not warranted to be representative of subsurface conditions at other locations and times.

BORING 10 (Continued)

DATE DRILLED: May 2, 1987
EQUIPMENT USED: 24"-Diameter Bucket 0' to 24'
20"-Diameter Bucket below 24'

ELEVATION (ft.)	DEPTH (ft.)	MOISTURE (% of dry wt.)	DRY DENSITY (lbs./cu. ft.)	DRIVE ENERGY (ft.-kips/ft.)	SAMPLE LOC.
245					
	45				
240		26.4	98	10	
	50				
235		26.3	98	9	
	55				

NOTE: Water seepage encountered at a depth of 17'. Sloughing from 17' to 21'.

LOG OF BORING

LeROY CRANDALL AND ASSOCIATES

PLATE A - 1.10b

JOB A-85091-8 DATE 5/12/87 F.T. TC DR. dmh O.E. MD W.P. dmh CHKD

Note: The log of subsurface conditions shown hereon applies only at the specific boring location and at the date indicated. It is not warranted to be representative of subsurface conditions at other locations and times.

BORING 11

DATE DRILLED: May 3, 1987
EQUIPMENT USED: 24"-Diameter Bucket 0' to 19-1/2'
20"-Diameter Bucket below 19-1/2'
ELEVATION 285

ELEVATION (ft.)	DEPTH (ft.)	MOISTURE (% of dry wt.)	DRY DENSITY (lbs./cu. ft.)	DRIVE ENERGY (ft.-kips/ft.)	SAMPLE LOC.
		10.2	104	8	
280	5				
275	10	5.2	132	26	SW
		11.0	123	20	
270	15				
		30.1	92	20	
265	20	26.5	101	6	
		25.2	101	6	
260	25				
		26.9	98	10	
		25.4	100	12	
255	30				
250	35	26.1	97	10	
245	40	25.3	98	12	

2" Asphaltic Paving
FILL - DEBRIS - pieces of brick with Sand, Silt and Clay, some Gravel, brown

1/2" diameter metal pipe

(ROCK BUCKET USED)
Pieces of concrete
3" concrete slab
GRAVELLY SAND - well graded, about 15% Gravel and Cobbles (to 8" in size), brown

Some Clay

SILTSTONE - dark grey

(CONTINUED ON FOLLOWING PLATE)

LOG OF BORING

LeROY CRANDALL AND ASSOCIATES

PLATE A-1.11a

JOB A-85091-B DATE 5/12/87 F.T. TC DR. dmh O.E. MD W.P. dmh CHKD

BORING 11 (Continued)

DATE DRILLED: May 3, 1987
EQUIPMENT USED: 24"-Diameter Bucket 0' to 19-1/2'
20"-Diameter Bucket below 19-1/2'

ELEVATION (ft.)	DEPTH (ft.)	MOISTURE (% of dry wt.)	DRY DENSITY (lbs./cu. ft.)	DRIVE ENERGY (ft.-kips/ft.)	SAMPLE LOC.
240	45	25.7	99	12	
235	50	24.9	98	14	
230	55				

NOTE: Water seepage encountered at a depth of 16-1/2'. Heavy raveling from 0' to 10' and slight raveling from 10' to 17'.

Note : The log of subsurface conditions shown hereon applies only at the specific boring location and at the date indicated. It is not warranted to be representative of subsurface conditions at other locations and times.

LOG OF BORING

LeROY CRANDALL AND ASSOCIATES

PLATE A - 1.11b

Appendix IS-3

Water Resources Technical Report

PSOMAS

222 West 2nd Street Project
Water Resources Technical Report

November 10, 2016

Prepared by:

David J. Curtis, P.E., ENV SP
PSOMAS
555 South Flower Street, Suite 4300
Los Angeles, California 90071
(213) 223-1400
(213) 223-1444 Fax

Prepared for:

Tribune Real Estate Holdings, LLC

TABLE OF CONTENTS

1.0 Introduction

1.1 Project Description

The 222 West 2nd Street Project involves the development of a 30-story mixed-use building consisting of 107 residential condominium units, approximately 534,044 square feet of office uses, and approximately 7,200 square feet of ground level commercial retail floor area on a 2.71-acre site that currently includes a surface parking lot and a five-story parking structure. The Project Site, which is bounded by Broadway on the west, 2nd Street on the north, and Spring Street on the east, will also house a Regional Connector Metro rail station on the northwest corner of the site (2nd Street and Broadway), which is currently under construction.

The existing five-level parking structure on the southern portion of the Project Site will remain and provide the required vehicular and long-term bicycle parking for the proposed uses. The parking structure also will continue to provide parking for the nearby L.A. Times buildings located on the north side of 2nd Street, as well as for other uses in the area. Access to the parking structure will occur via one existing driveway on Broadway and two existing driveways on Spring Street. In addition, one new driveway on Spring Street is proposed to access the loading area for the new building.

1.2 Scope of Work

This report provides a description of the surface water hydrology and surface water quality at the Project Site and an analysis of the Project's potential significance related to the impact on surface water hydrology and surface water quality.

2.0 Surface Water Hydrology

2.1 General Approach

The watershed of the project was identified and characterized for the proposed condition. Computer modeling was used to estimate the runoff flow rate for the 85th % storm (SUSMP/LID), 5-,10-, 25-, 50-, and 100-year storm events.

2.2 Data Sources

The primary sources of data are the *LACDPW Hydrology / Sedimentation Manual and Appendices* (LACDPW 2006), and the Los Angeles County *Standard Urban Stormwater Mitigation Plan* (September 2002).

Rainfall and soil characteristics for the Project Site are given in Isohyetal Map Figure LACDPW 1-HI.19 (Section 4). A copy of the map is provided in Section 6.0. The 50-year (24-hour) rainfall isohyet nearest the project area is approximately 5.95-inches. The isohyets for all of the storm events, based on factors from the LA County Hydrology Manual in Table 5.3.1, are as listed:

- 5-Year 24-Hour: 3.47-inches
- 10-Year 24-Hour: 4.25-inches
- 25-Year 24-Hour: 5.22-inches
- 50-Year 24-Hour: 5.95-inches
- 100-Year 24-Hour: 6.68-inches

As shown on the Isohyetal Map, the soil classification of the project site falls predominantly into Soil Type 006. The project area to be disturbed is approximately 1.27 acres.

2.3 Existing Site Conditions

The existing Project Site is comprised of a 5-story parking garage and an at grade parking lot totaling approximately 2.71 acres with an average imperviousness of 81%. The site is bounded by 2nd Street to the north, Spring Street to the east, Broadway to the west, and private property to the south.

The existing site drainage flows either west to Broadway, north to 2nd St or east to Spring St via sheet flow. All runoff leaving the Project Site ultimately enters a catch basin via the street gutter located at either the northwest corner of Spring St and 3rd St or the northeast corner of Broadway and 3rd St.

2.4 Proposed Project Site Conditions

The proposed project will consist of a 30-story tower that tiers down to multiple podium levels. The average imperviousness of the proposed Project Site will be approximately 80% and will continue to drain to either Broadway, 2nd St, or Spring Street, as to not change the existing drainage pattern.

2.5 Hydrology Results

Table below summarizes the hydrology results:

Table 1. Existing and Proposed Peak Runoff Flows

	Existing	Proposed*	
Storm Event	**Q_{Total} [cfs]**	**Q_{Total} [cfs]**	**% Reduction**
5-Yr	1.13	0.95	**16%**
10-Yr	1.50	1.32	**12%**
25-Yr	1.98	1.79	**9.6%**
50-Yr	2.42	2.24	**7.4%**
100-Yr	2.84	2.65	**6.7%**

* Includes reduction from LID implementation (subtracting the 85th Percentile storm flow)

The Project Site behaves in a similar manner as paved or impervious surfaces. Thus, while existing paved areas of the existing parking lot would be replaced by new impervious surfaces, from a hydrological perspective, these areas would be considered to have the same properties as existing pervious surfaces during an intense rain event.

As discussed above, based on the drainage patterns and flow paths of stormwater that are tributary to a common point or area within the Project Site, the boundaries of the drainage areas would remain as under existing conditions (see grading plan in section 7.0 for more information on the proposed runoff pattern).Therefore, the flow patterns and discharge points under existing conditions would be maintained with the Project.

Expected peak runoff flows for the 5-, 10-, 25-, 50- and 100-year storm events for the Project are shown in Table 1. This table also contains a comparison of the existing and proposed peak runoff flows at the discharge points from the Project Site to the public right-of-way. The proposed runoff reduction takes into account the Project's compliance with the Low Impact Development (LID) requirements which will manage post construction stormwater runoff. The Project would include the installation of catch basins, planter drains, and roof downspouts throughout the Project Site to collect roof and site runoff, and direct stormwater away from the structures through a series of underground storm drain pipes. This onsite stormwater conveyance system would serve to prevent onsite flooding and nuisance water on the Project Site. In addition, with implementation of a stormwater capture and use system (i.e. harvesting system for on-site irrigation use), the volume of water leaving the Project Site would be further reduced compared to the existing conditions. Additionally, the Project Site is not located within a FEMA or City of Los Angeles designation 100- or 500- year flood plain, nor is it located within a potential inundation area as designed by the City of Los Angeles General Plan Safety Element.

3.0 Surface Water Quality

3.1 General Approach

The project falls under the jurisdiction of the City of Los Angeles Department of Public Works, which follows the 2009 Low Impact Development (LID) Manual design guidelines. The purpose of this surface water quality report is:

- To meet City of Los Angeles Department of Public Works requirements;
- To document that the Los Angeles County LID requirements will be met;
- To determine the proposed development's impact on existing hydrologic conditions;
- To identify the pollutants of concern and provide BMPs that will mitigate those pollutants of concern; and
- To provide sufficient detailed information to support detailed hydraulic design of stormwater treatment systems.

3.2 Site Characterization for Water Quality Review

Current Property Use: At grade parking lot and open space, and parking structure (in the southern portion of the site), which will remain. The parking lot is currently being used as a temporary construction staging area for the Los Angeles County Metropolitan Transportation Authority's Regional Connector project.

Proposed Property Use: Mixed-use: residential, office and commercial development.

Soils: The soil of the watershed is classified as Type 006, as shown in the Hydrology Map from the Los Angeles County Department of Public Works (LACDPW) website (see section 6.0 for map).

Receiving Waters: The Project Site is tributary to the Los Angeles River Reach 2.

The Los Angeles River Reach 2 is listed on the 2012 CWA Section 303(d) list (approved by SWRCB June 30, 2015) as impaired due to the prevalence of the pollutants shown in Table 2, which is excerpted from the State Water Resources Control Board, "Quality Limited Segments" article dated June 9, 2016. Currently, this waterway's existing beneficial uses include ground water recharge, warm freshwater habitat, water contact recreation, and non-contact water recreation; potential uses include municipal and domestic supply, industrial service supply, and wildlife habitat.

Table 2: Receiving Waters for Urban Runoff from Site[1]

Receiving Waters	303(d) List Impairments[2]	Designated Beneficial Uses	Proximity to RARE Uses
Los Angeles River Reach 2	Ammonia, Coliform Bacteria, Copper, Lead, Nutrients (Algae), Oil, Trash	Existing/Intermittent: GWR, WARM Potential: MUN, IND, WILD	No

3.3 Pollutants of Concern

Table 3 lists the pollutants anticipated to be generated by the Project's proposed land uses. Because the Project falls under the category of commercial development, the following pollutants could potentially be generated: sediment/turbidity, nutrients, trash and debris, oxygen demanding substances, bacteria and viruses, oil and grease and pesticides.

Table 3: Potential Pollutants Generated by Land Use Type[3]

Type of Development (Land Use)	Sediment /Turbidity	Nutrients	Organic Compounds	Trash & Debris	Oxygen Demanding Substances	Bacteria & Viruses	Oil & Grease	Pesticides	Metals
Commercial Development	P(1)	P(1)	P(4)	P	P(4)	P(3)	P	P(1)	N
Residential	P	P	N	P	P(1)	P	P(2)	P	N

Abbreviations: P=Potential N=Not expected

Notes:

(1) A potential pollutant if landscaping or open area exists on the Project site
(2) A potential pollutant if land use involves animal waste
(3) Specifically, petroleum hydrocarbons
(4) Bacterial indicators are routinely detected in pavement runoff.

A comparison of the pollutants existing in the Los Angeles River Reach 2 based on the State 303(d) list and pollutants associated with the planned land use activities on the Project Site show an overlap of **sediment**, **trash, and bacteria & viruses** as pollutants. These common pollutants are considered the pollutants of concern. Stormwater best management practices (BMP) proposed for the Project will be designed to address these pollutants of concern. Table 4 summarizes the efficiency of general categories of BMPs in treating different types of pollutants.

The City of Los Angeles requires LID compliance for this Project. As noted above, the LID concept for this project is a stormwater capture and use system. The runoff within the cistern will be pumped up for irrigation of the landscape around the Project Site. High flow outlets for the rainwater harvesting cistern will be routed to discharge as per proposed conditions, as described in section 2.4.

[1] State Water Resources Control Board, Los Angeles Region. *Water Quality Control Plan Los Angeles Region*. June 13, 1994.

[2] Los Angeles Regional Water Quality Control Board. 2010 CWA Section 303(d*) List of Water Quality Limited Segments*. October 11, 2011.

[3] Riverside County Flood Control and Conservation District, Riverside County Water Quality Management Plan for Urban Runoff, July 24, 2006. Note: This source is utilized because the Los Angeles County Flood Control District has not established a table that outlines pollutants of concern.

Table 4: Treatment Control BMP Selection Matrix[4]

Los Angeles River Pollutant of Concern (Yes/No)	Treatment Control BMP Categories							
	Veg. Swale /Veg. Filter Strips	Detention Basins	**Planter Box / Harvesting /Infiltration Basins & Trenches**	Wet Ponds or Wetlands	Sand Filter or Filtration	**Water Quality Inlets**	Hydro-dynamic Separator Systems	Manufactured / Proprietary Devices
Sediment/Turbidity	H/M	M	H/M	H/M	H/M	L	H/M (L for turbidity)	U
Yes			✓			✓		
Nutrients	L	M	H/M	H/M	L/M	L	L	U
No								
Organic Compounds	U	U	U	U	H/M	L	L	U
No								
Trash & Debris	L	M	U	U	H/M	M	H/M	U
Yes			✓			✓		
Oxygen Demanding Substances	L	M	H/M	H/M	H/M	L	L	U
No								
Bacteria & Viruses	U	U	H/M	U	H/M	L	L	U
Yes			✓			✓		
Oils & Grease	H/M	M	U	U	H/M	M	L/M	U
No								
Pesticides (non-soil bound)	U	U	U	U	U	L	L	U
No								
Metals	H/M	M	H	H	H	L	L	U
No								

Abbreviations:
L: Low removal efficiency H/M: High or medium removal efficiency U: Unknown removal efficiency

[4] Riverside County Flood Control and Conservation District, Riverside County Water Quality Management Plan for Urban Runoff, July 24, 2006. Note: This table is utilized because the Los Angeles County Flood Control District has not established a table that summarizes each BMP's efficiency for treating pollutants of concern.

3.4 Best Management Practices

Source and Treatment Control Best Management Practices (BMPs) are required for this Project under the LA County Standard Urban Stormwater Mitigation Plan (SUSMP) and City of Los Angeles Low Impact Development (LID) Standards Manual.

3.4.1 Site Design BMPs

3.4.1.1 Minimize Stormwater Pollutants of Concern

The Project will minimize pollutants of concern by maximizing the reduction of pollutant loadings to the Maximum Extent Practicable. The pollutants of concern – namely, sediment, trash, and bacteria & viruses– will be addressed through a pre-treatment settlement device connected to the cistern within the Project Site. Building roof run-off, which comprises of the majority of the site, will be collected via roof drains and routed internally through the building and plumbed into the harvesting tank. Prior to connection to the harvesting tank, downspout filters will be installed to remove any debris that enters the on-site piping system. In addition, permeable pavement is proposed on-site to reduce the overall stormwater runoff. All other stormwater run-off will be collected via catch basins or trench drains fitted with an insert to collect debris and sediment and routed to the stormwater tank.

3.4.1.2 Conserve Natural Areas

The existing Project Site consist of a parking structure and an at-grade parking lot. There is minimal existing landscape along the parking structure adjacent to the parking lot. The existing parking structure will remain. The proposed development within the existing at-grade parking lot includes additional landscape features including permeable pavement and a landscaped paseo. The proposed development will modify a portion of the site but will provide water quality treatment not previously provided in the existing condition as well as an increase of landscape area.

3.4.2 Source Control BMPs

3.4.2.1 Protect Slopes and Channels

There are no unprotected slopes or unlined channels onsite. The entire area to be developed will be either vegetated or hardscaped.

3.4.2.2 Provide Storm Drain System Stenciling and Signage

Stenciling will be provided for public storm drains near the vicinity of the project.

3.4.2 Treatment Control BMPs

3.4.3.1 Mitigation Design (Volumetric or Flow based)

Volume-based or flow-based design standards may be used separately or in combination. Volume-based criteria are used in the sizing of the cistern. The LID requirements, approved by the Regional Water Quality Control Board, call for the treatment of the peak mitigation flow rate or volume of runoff produced either by a 0.75” 24-hr or the 85th percentile rainfall event, whichever is greater. The rainfall intensity of the 85th percentile rainfall is 1 inch, therefore the 85th percentile rainfall event governs.

The LID calculation methodology was used to calculate the required treatment volumes for each of the discharge points from the site. LID Calculations are provided in section 6.0. The results are summarized in the tables below.

Table 5. Proposed Condition SUSMP Results

Project Site Area [ac]	BMP Type	85th percentile
		*V_M [ft^3]
1.27	Stormwater Capture and Use	3,405

*The total volume (Vm) of stormwater runoff to be mitigated was calculated by analyzing the project area as one area. Using this Vm and the appropriate BMP calculation from the City of LA LID manual, Table 6 shows the requirements for the area.

Table 6. Summary SUSMP / LID Mitigation BMPs

Area	Area [ac]	Impervious Area [ac]	Required Storage Tank V_M [ft^3]	BMP Type	Provided Treatment V_M [ft^3]	% Treated	Impervious Area Untreated [ac]
1[5]	1.27	0.75	3,405	Storage Tank	3,410	100	0
Total Percent Treatment						**100%**	

The proposed BMP in place is able provide 100% treatment. The selected BMP for the site has the capacity to capture and reuse more than the required baseline volume of 3,405 ft^3. The total provided treatment volume is 3,410 ft^3.

4.0 Significance Thresholds

4.1 Surface Water Hydrology

The City of Los Angeles CEQA Thresholds Guide states that a project would normally have a significant impact on surface water hydrology if it would:

- Cause flooding during the projected 50-year developed storm event, which would have the potential to harm people or damage property or sensitive biological resources;
- Substantially reduce or increase the amount of surface water in a water body; or
- Result in permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

4.2 Surface Water Quality

The City of Los Angeles CEQA Thresholds Guide states that a project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination or nuisance, as defined in Section 13050 of the California Water Code (CWC) or that

[5] BMP required calculation based on City of LA LID manual.

cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. The CEQA Thresholds Guide and CWC include the following definitions:

"Pollution" means an alteration of the quality of waters of the state to a degree which unreasonably affects either the following: 1) the waters for beneficial uses or 2) facilities which serve these beneficial uses. "Pollution" may include "Contamination".

"Contamination" means an impairment of the quality of the waters of the state by waste to a degree, which creates a hazard to the public health through poisoning or through the spread of disease. "Contamination" includes any equivalent effect resulting from the disposal of waste, whether or not waters of the state are affected.

"Nuisance" means anything which meets all of the following requirements: 1) is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property; 2) affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extend of the annoyance or damage inflicted upon individuals may be unequal; and 3) occurs during, or as a result of the treatment or disposal of wastes. [6]

5.0 Construction Activities

5.1 Construction General Permit

In 2003, the California State Water Resources Control board (SWRCB) adopted the General Construction Activity Stormwater Permit (CGP)[7], which is "…required for all storm water discharges associated with construction activity where clearing, grading, and excavation results in a land disturbance of one or more acres." Under the CGP, the following Permit Registration Documents must be submitted to SWRCB through the SMARTS website: a Notice of Intent (NOI), a Storm Water Pollution Prevention Plan (SWPPP), and other compliance related documents required by this CGP and mail the appropriate permit fee to the SWRCB. Because the land disturbance for the Project Site is over one acre, the requirements mentioned above will need to be implemented.

The CGP requires all SWPPPs be written, amended, and certified by a Qualified SWPPP Developer, emphasizing BMPs, which are defined as "schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the United States." The SWPPP has two major objectives:

- to help identify the sources of sediment and other pollutants that affect the quality of stormwater discharges; and
- to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in storm water and non-storm water discharges. The SWPPP must include BMPs that address source control, BMPs that address pollutant control, and BMPs that address treatment control.

Furthermore, the CGP requires that a project are enrolled for more than one continuous three-month period to submit information and annually certify that their site is in compliance with these requirements. The primary purpose of this requirement is to provide information needed for overall program evaluation and pubic information. The CGP requires that key personnel (e.g., Qualified SWPPP Developers, inspectors, etc.) have specific training or certifications to ensure their level of knowledge and skills are

[6] City of Los Angeles. LA CEQA Thresholds Guides. 2006

[7] Construction General Permit Water Quality Order 2009-0009-DWQ, Fact Sheet, website: http://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/constpermits/wqo_2009_0009_complete.pdf, accessed October 25, 2016.

adequate to ensure their ability to design and evaluate project specifications that will comply with CGP requirements. Erosion control and drainage devices are required to be provided in accordance with the CGP and SWPPP as well as the MS4 Permit. Dewatering activities during construction will need to be implemented through BMPs targeting sediment specific pollutants such as Sediment Treatment, Sediment Basin, Sediment Trap, and other BMPs listed on CASQA's NS-2 Dewatering Operations[8].

6.0 Level of Significance

6.1 Significance Summary – Surface Water Hydrology

Based on the above, the Project would not result in an incremental impact for flooding on either on-site or off-site areas during a 50-year storm event, it would not substantially increase the amount of surface water in a water body, and it will not result in a permanent adverse change to the movement of surface water that would result in an incremental effect on the capacity of the existing storm drain system. Therefore, the development of the Project would result in less than significant impact on surface water hydrology.

6.2 Significance Summary – Surface Water Quality

Due to the nature of the proposed development to change the land use from an existing parking lot to a mixed-use residential and commercial development, the Project will result in a reduction of potential types of pollutants. As detailed in Section 3.0, a comparison between the potential pollutant based on land use and the 303(d) list for Los Angeles River Reach 2 indicates that the pollutants of concern are **sediment**, **trash, and bacteria & viruses.** These three pollutants of concern will be addressed through the proposed stormwater BMPs in order to comply with Los Angeles County's Standard Urban Stormwater Mitigation Plan (SUSMP) and City of Los Angeles' Low Impact Development Ordinance. These BMPs include elements such as permeable pavement, rainwater harvesting, and an increase of landscape area. During construction of the project, a SWPPP written by a Qualified SWPPP Developer will be prepared to implement temporary control measures throughout the construction phase. Based on the analysis contained in this report, there are no significant impacts for surface water quality as a result of the Project. With compliance under the SWPPP, SUSMP, and the City's LID Ordinance, construction and operational water quality impacts would be less than significant.

[8] California Stormwater BMP Handbook Construction, Fact Sheet NS-2 Dewatering Operations, July 2012.

7.0 Calculations and Site Plan

Project No 1TRI80200
222 West 2nd St.
Los Angeles, CA 90012

Tribune Volume Calculations:

Givens:

Areas = Building A

Breakdown	sqft	acre
Area Total	55,115	1.266
Impervious, Ai	44,147	1.014
Pervious, Ap	10,968	0.252
Undeveloped Area, Au	0	0
Exempt Area	0	0
TOTAL	**55,115**	**1.266**
Landscaped Areas Counted Towards Mitigation Volume*		
Landscaped Area Ground Level		0
Landscaped Area Level 8		0
Landscaped Area Level 15		0
Landscaped Area Level 27		0
TOTAL Pervious	**10,968**	**0.252**
Landscaped Areas Counted Towards ETWU**		
Additional Landscaped Area	1,098	0.026
TOTAL Additional Pervious	**1,098**	**0.026**
Exempt Area***		
Misc Areas	0	0
TOTAL Exempt	**0**	**0.00**

***Note these are landscaped areas exposed to the sky.**

****Note these are additional landscaped areas NOT EXPOSED to the sky.**

1066

*****Note these are water features exposed to the sky.**

Soil media infiltration rate:	2.5	in/hr	(Table 4.5)
T_{Fill} =	3	hrs	(Table 4.5)
Drawdown time, T (hr) =	48	hrs	(Table 4.5)
$K_{Sat,Design}$ Factor of Safety, FS =	2		
$V_{design\ Planter}$ Factor of Safety =	1.5		
Design Storm =	85th Percentile		(Per City of LA requirement)
Design Storm Intensity =	1	in	(Per LA County Hydrology GIS)
Planting Factor =	0.5		(Per Landscape Architect)
7 Month Evapotranspiration, ET_7	21.7		(Per City of LA Irrigation Guidelines, App C)

i. Determine the Mitigation Volume (V_M):

V_M (ft^3) = 85th Percentile Intensity (in) * Catchment Area (acres) * (3630 cuft/1ac-in)

where Catchment Area (acres) = (Impervious Area * 0.9) + [(Pervious area + Undeveloped area) * 0.1]

V_M (ft^3) = 1*[(1.014*0.9)+[(0.252+0)*0.1]] * 3630 ft^3

V_M (ft^3) = 3405 ft^3 or 25,500 Gallons

The design will be a rainwater harvesting system, therefore,

V_M (ft^3) =	**3405**	**ft^3**	**or**	**25,500**	**Gallons**

ii. Determine planting area (ft^2):

Planting Area (ft^2) = 10968 + 1098 ft^2

Planting Area (ft^2) = 12,066 ft^2

iii. Determine Planter Factor, PF, (ft^2)

Planter Factor (ft^2) = Planting Factor x Planting Area

Planter Factor (ft^2) = 0.5 x 12066 ft2

Planter Factor (ft^2) =	**6033** **ft^2**

iv. Determine the 7-month (Oct 1-April 30) Estimated Total Water Use (ETWU):

$ETWU_{(7\text{-month})}$ = ET_7 x 0.62 x PF

$ETWU_{(7\text{-month})}$ = 21.7 x 0.62 x 6033

$ETWU_{(7\text{-month})}$ =	**81168** **gal**

v. Verify $ETWU_{(7\text{-month})}$ is greater than or equal to V_{WQDV}:

$ETWU_{(7\text{-month})}$	≥	***$V_{(Design)}$ (gal)***
81,168	≥	***25,500***

CAPTURE AND USE IS FEASIABLE

Peak Flow Hydrologic Analysis

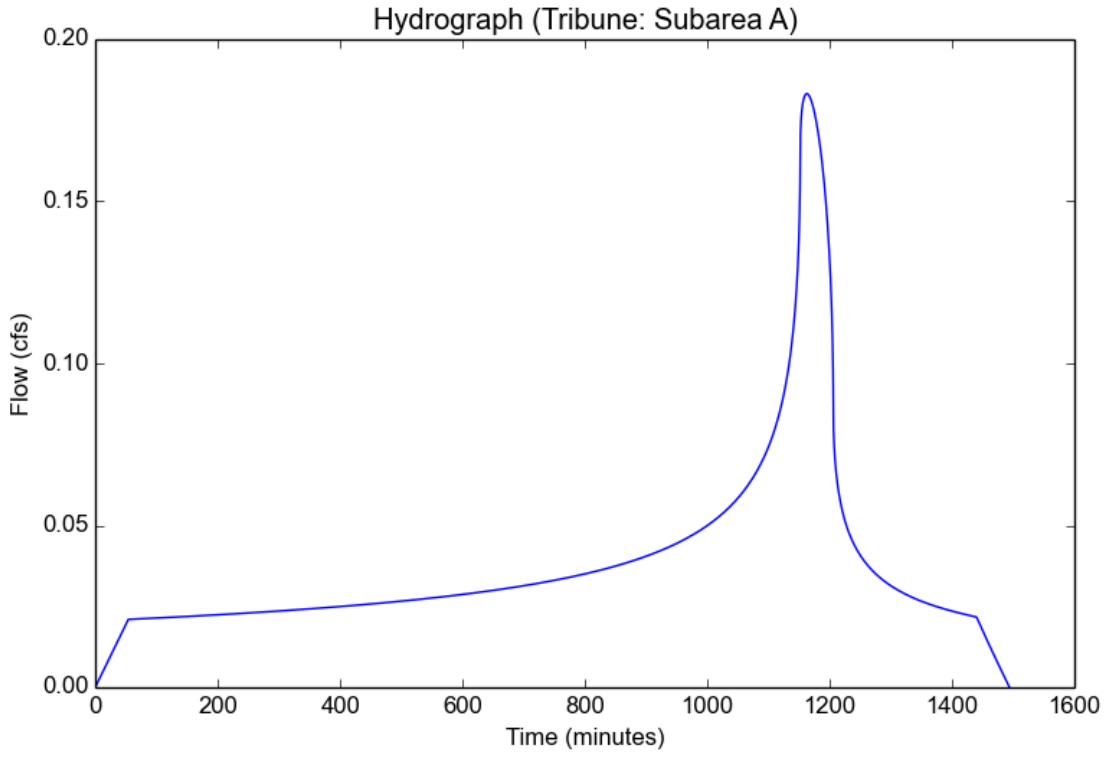
File location: W:/1TRI180200/ENGR/DOCS/EIR Hydrology Report/Hydro Calc/Tribune - Prop 85th.pdf
Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Tribune
Subarea ID	Subarea A
Area (ac)	1.27
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.01
85th Percentile Rainfall Depth (in)	1.0
Percent Impervious	0.8
Soil Type	6
Design Storm Frequency	85th percentile storm
Fire Factor	0
LID	True

Output Results

Modeled (85th percentile storm) Rainfall Depth (in)	1.0
Peak Intensity (in/hr)	0.195
Undeveloped Runoff Coefficient (Cu)	0.1
Developed Runoff Coefficient (Cd)	0.74
Time of Concentration (min)	54.0
Clear Peak Flow Rate (cfs)	0.1832
Burned Peak Flow Rate (cfs)	0.1832
24-Hr Clear Runoff Volume (ac-ft)	0.0777
24-Hr Clear Runoff Volume (cu-ft)	3383.4079



Peak Flow Hydrologic Analysis

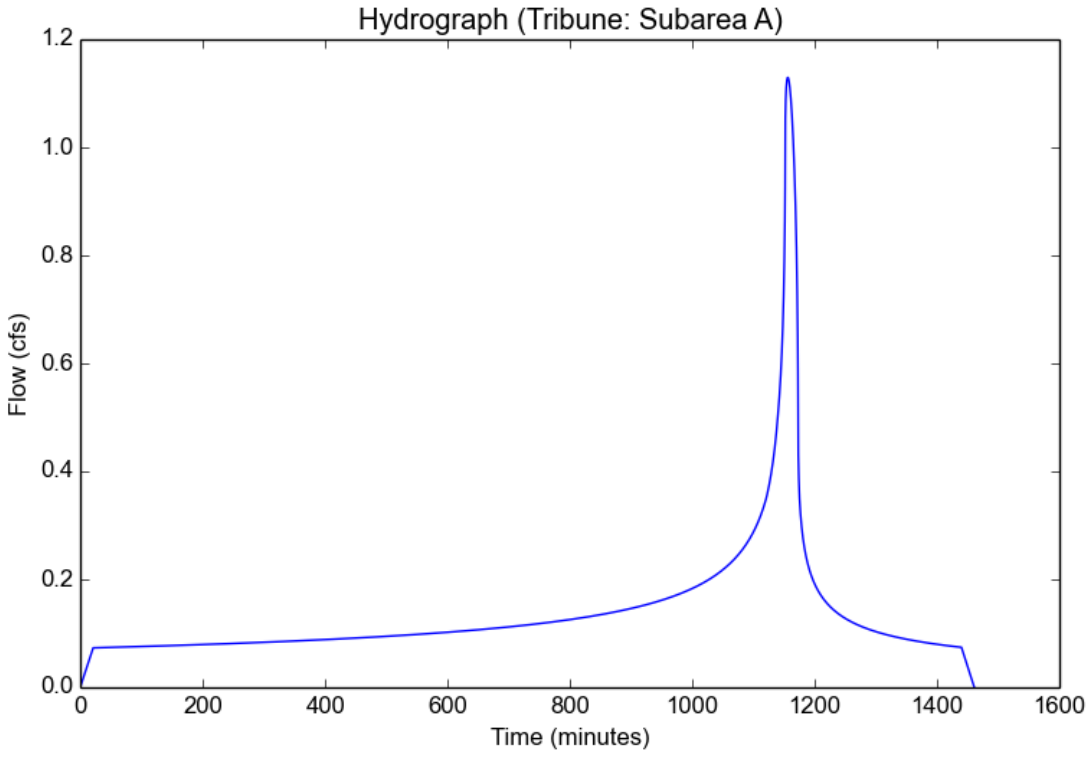
File location: W:/1TRI180200/ENGR/DOCS/EIR Hydrology Report/Hydro Calc/Tribune - Existing 5 Yr.pdf
Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Tribune
Subarea ID	Subarea A
Area (ac)	1.27
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.01
50-yr Rainfall Depth (in)	5.95
Percent Impervious	0.81
Soil Type	6
Design Storm Frequency	5-yr
Fire Factor	0
LID	False

Output Results

Modeled (5-yr) Rainfall Depth (in)	3.4748
Peak Intensity (in/hr)	1.0561
Undeveloped Runoff Coefficient (Cu)	0.5955
Developed Runoff Coefficient (Cd)	0.8422
Time of Concentration (min)	21.0
Clear Peak Flow Rate (cfs)	1.1295
Burned Peak Flow Rate (cfs)	1.1295
24-Hr Clear Runoff Volume (ac-ft)	0.277
24-Hr Clear Runoff Volume (cu-ft)	12064.2954



Peak Flow Hydrologic Analysis

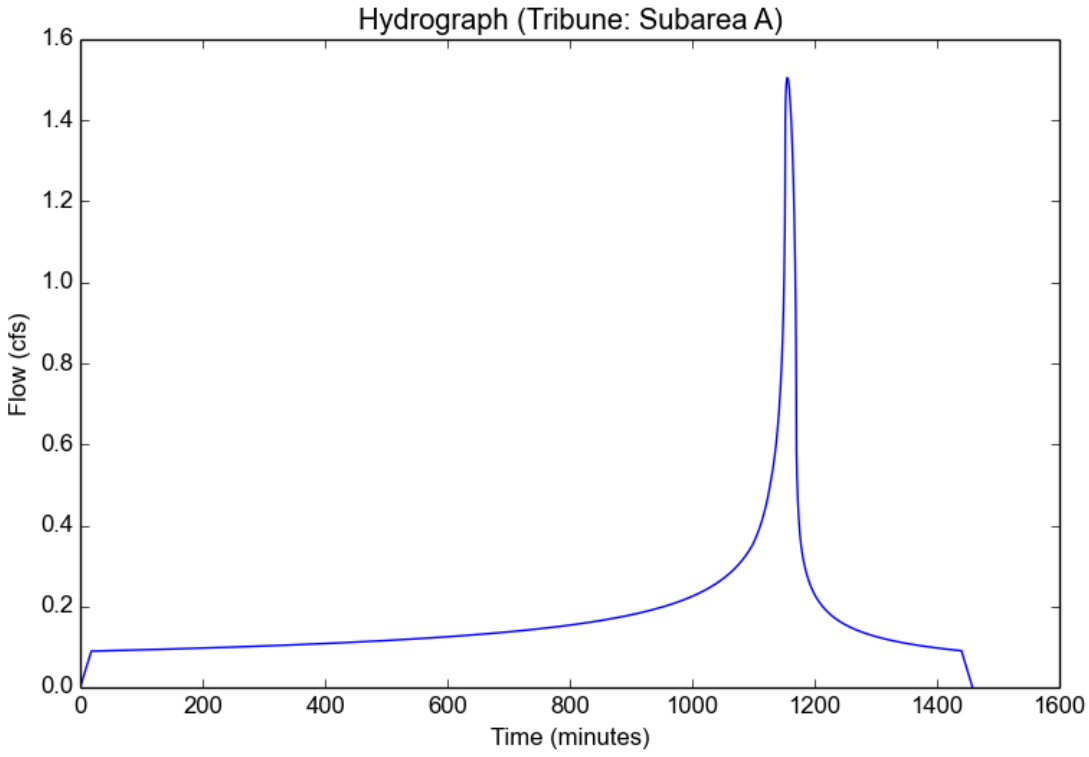
File location: W:/1TRI180200/ENGR/DOCS/EIR Hydrology Report/Hydro Calc/Tribune - Existing 10 Yr.pdf
Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Tribune
Subarea ID	Subarea A
Area (ac)	1.27
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.01
50-yr Rainfall Depth (in)	5.95
Percent Impervious	0.81
Soil Type	6
Design Storm Frequency	10-yr
Fire Factor	0
LID	False

Output Results

Modeled (10-yr) Rainfall Depth (in)	4.2483
Peak Intensity (in/hr)	1.3882
Undeveloped Runoff Coefficient (Cu)	0.6568
Developed Runoff Coefficient (Cd)	0.8538
Time of Concentration (min)	18.0
Clear Peak Flow Rate (cfs)	1.5053
Burned Peak Flow Rate (cfs)	1.5053
24-Hr Clear Runoff Volume (ac-ft)	0.34
24-Hr Clear Runoff Volume (cu-ft)	14808.9661



Peak Flow Hydrologic Analysis

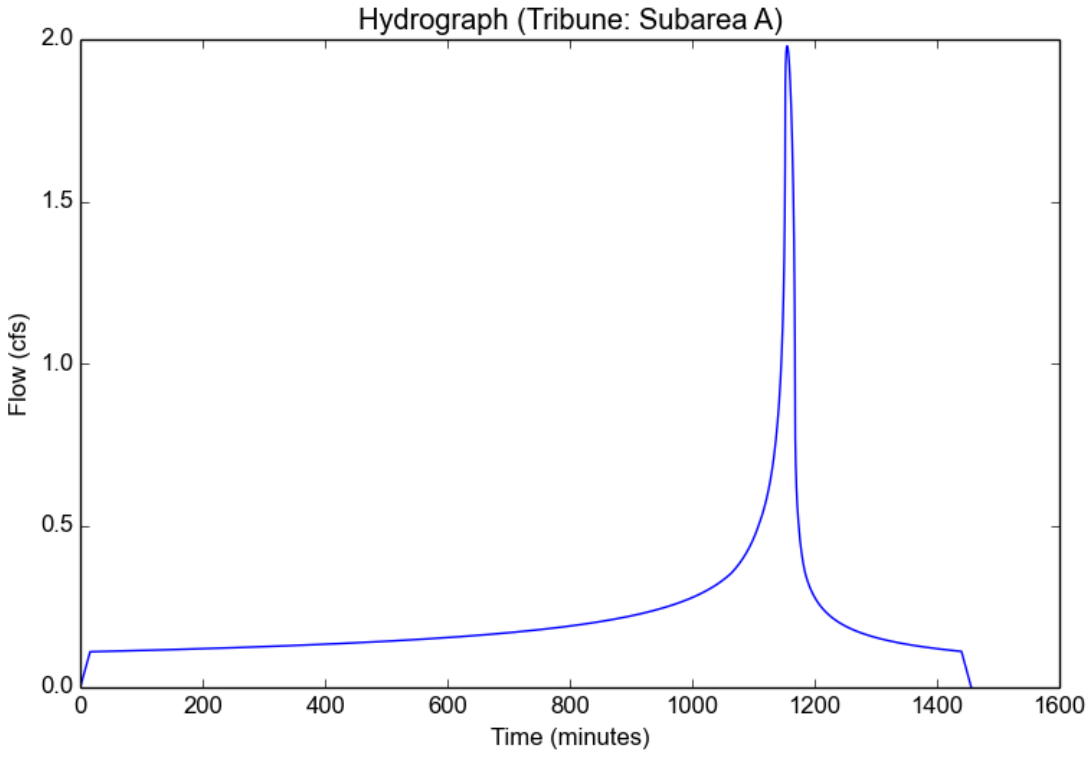
File location: W:/1TRI180200/ENGR/DOCS/EIR Hydrology Report/Hydro Calc/Tribune - Existing 25 Yr.pdf
Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Tribune
Subarea ID	Subarea A
Area (ac)	1.27
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.01
50-yr Rainfall Depth (in)	5.95
Percent Impervious	0.81
Soil Type	6
Design Storm Frequency	25-yr
Fire Factor	0
LID	False

Output Results

Modeled (25-yr) Rainfall Depth (in)	5.2241
Peak Intensity (in/hr)	1.8042
Undeveloped Runoff Coefficient (Cu)	0.7108
Developed Runoff Coefficient (Cd)	0.8641
Time of Concentration (min)	16.0
Clear Peak Flow Rate (cfs)	1.9799
Burned Peak Flow Rate (cfs)	1.9799
24-Hr Clear Runoff Volume (ac-ft)	0.4202
24-Hr Clear Runoff Volume (cu-ft)	18305.7467



Peak Flow Hydrologic Analysis

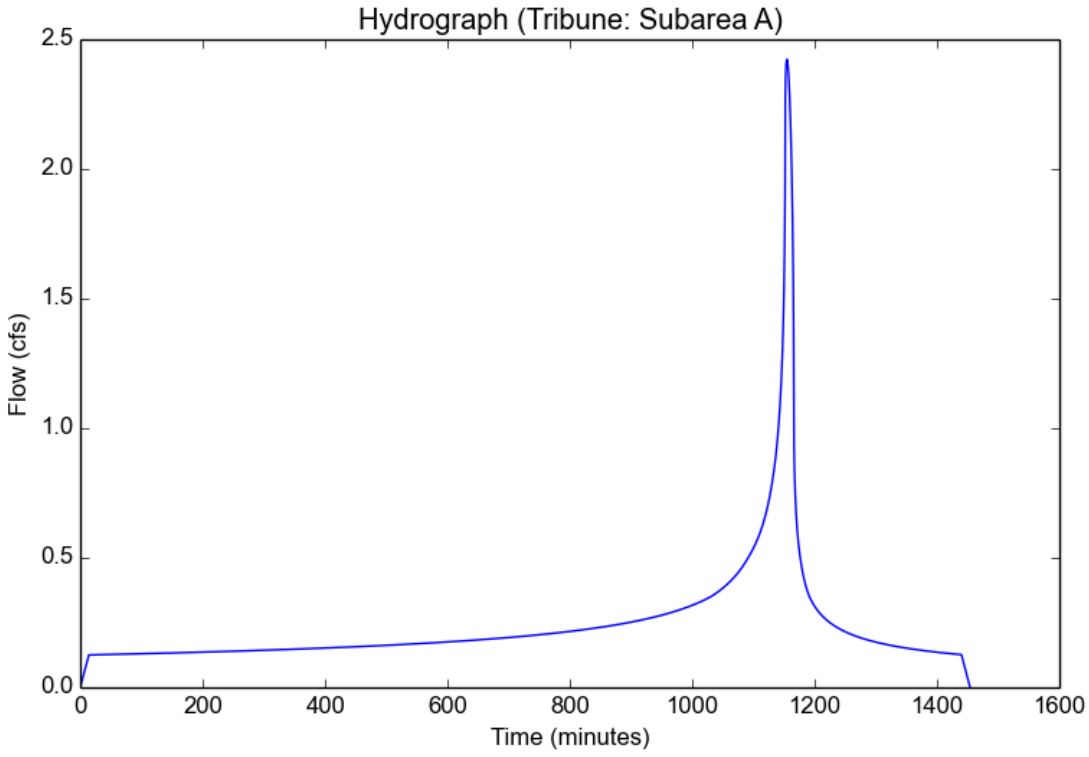
File location: W:/1TRI180200/ENGR/DOCS/EIR Hydrology Report/Hydro Calc/Tribune - Existing 50 Yr.pdf
Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Tribune
Subarea ID	Subarea A
Area (ac)	1.27
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.01
50-yr Rainfall Depth (in)	5.95
Percent Impervious	0.81
Soil Type	6
Design Storm Frequency	50-yr
Fire Factor	0
LID	False

Output Results

Modeled (50-yr) Rainfall Depth (in)	5.95
Peak Intensity (in/hr)	2.188
Undeveloped Runoff Coefficient (Cu)	0.7529
Developed Runoff Coefficient (Cd)	0.8721
Time of Concentration (min)	14.0
Clear Peak Flow Rate (cfs)	2.4233
Burned Peak Flow Rate (cfs)	2.4233
24-Hr Clear Runoff Volume (ac-ft)	0.4806
24-Hr Clear Runoff Volume (cu-ft)	20933.2947



Peak Flow Hydrologic Analysis

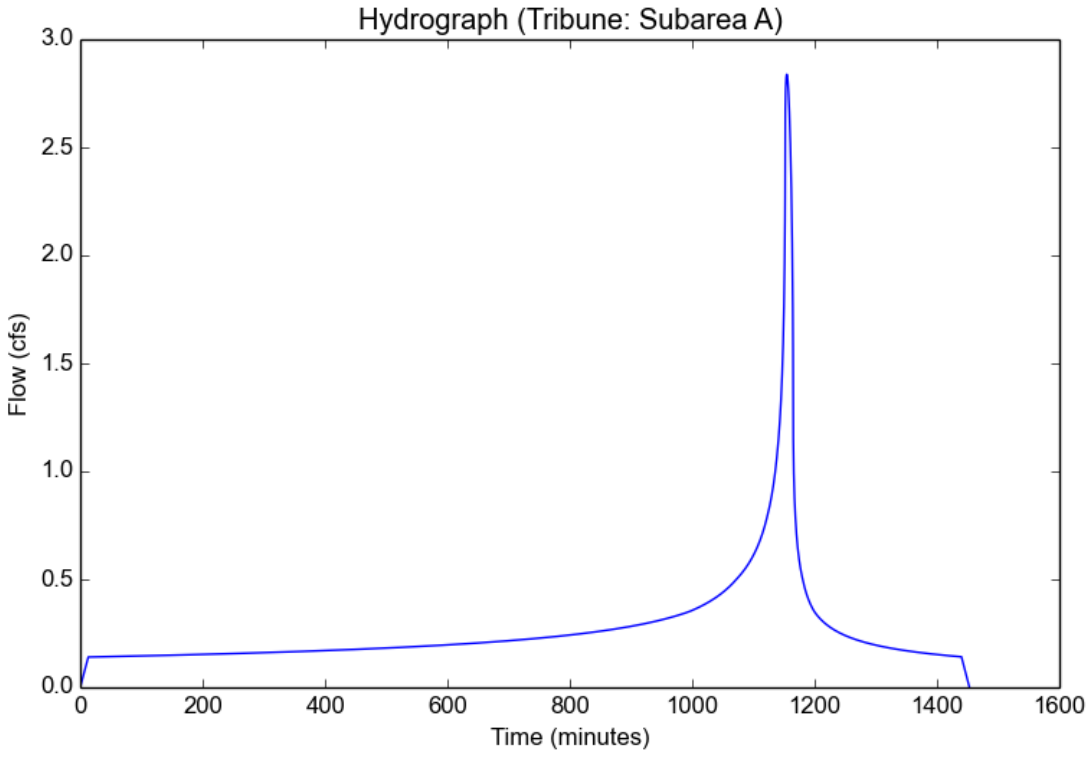
File location: W:/1TRI180200/ENGR/DOCS/EIR Hydrology Report/Hydro Calc/Tribune - Existing 100 Yr.pdf
Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Tribune
Subarea ID	Subarea A
Area (ac)	1.27
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.01
50-yr Rainfall Depth (in)	5.95
Percent Impervious	0.81
Soil Type	6
Design Storm Frequency	100-yr
Fire Factor	0
LID	False

Output Results

Modeled (100-yr) Rainfall Depth (in)	6.6759
Peak Intensity (in/hr)	2.542
Undeveloped Runoff Coefficient (Cu)	0.7901
Developed Runoff Coefficient (Cd)	0.8791
Time of Concentration (min)	13.0
Clear Peak Flow Rate (cfs)	2.8381
Burned Peak Flow Rate (cfs)	2.8381
24-Hr Clear Runoff Volume (ac-ft)	0.5414
24-Hr Clear Runoff Volume (cu-ft)	23584.514



Peak Flow Hydrologic Analysis

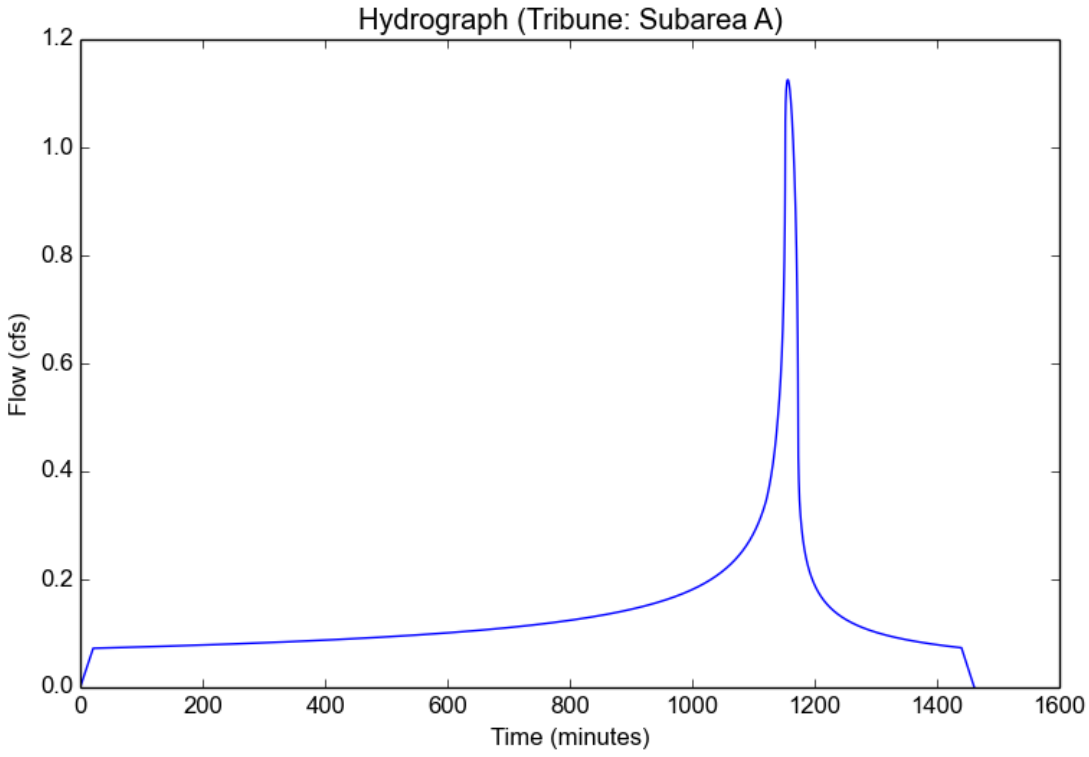
File location: W:/1TRI180200/ENGR/DOCS/EIR Hydrology Report/Hydro Calc/Tribune - Prop 5 Yr.pdf
Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Tribune
Subarea ID	Subarea A
Area (ac)	1.27
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.01
50-yr Rainfall Depth (in)	5.95
Percent Impervious	0.8
Soil Type	6
Design Storm Frequency	5-yr
Fire Factor	0
LID	False

Output Results

Modeled (5-yr) Rainfall Depth (in)	3.4748
Peak Intensity (in/hr)	1.0561
Undeveloped Runoff Coefficient (Cu)	0.5955
Developed Runoff Coefficient (Cd)	0.8391
Time of Concentration (min)	21.0
Clear Peak Flow Rate (cfs)	1.1255
Burned Peak Flow Rate (cfs)	1.1255
24-Hr Clear Runoff Volume (ac-ft)	0.2743
24-Hr Clear Runoff Volume (cu-ft)	11946.7221



Peak Flow Hydrologic Analysis

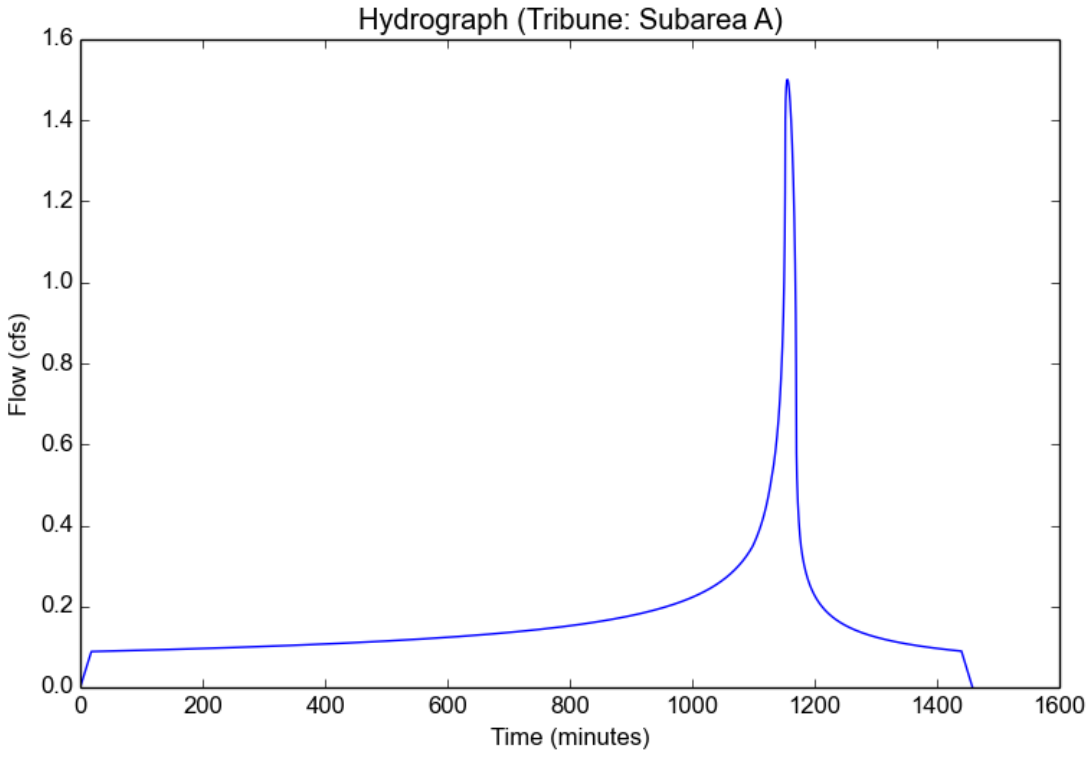
File location: W:/1TRI180200/ENGR/DOCS/EIR Hydrology Report/Hydro Calc/Tribune - Prop 10 Yr.pdf
Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Tribune
Subarea ID	Subarea A
Area (ac)	1.27
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.01
50-yr Rainfall Depth (in)	5.95
Percent Impervious	0.8
Soil Type	6
Design Storm Frequency	10-yr
Fire Factor	0
LID	False

Output Results

Modeled (10-yr) Rainfall Depth (in)	4.2483
Peak Intensity (in/hr)	1.3882
Undeveloped Runoff Coefficient (Cu)	0.6568
Developed Runoff Coefficient (Cd)	0.8514
Time of Concentration (min)	18.0
Clear Peak Flow Rate (cfs)	1.501
Burned Peak Flow Rate (cfs)	1.501
24-Hr Clear Runoff Volume (ac-ft)	0.3367
24-Hr Clear Runoff Volume (cu-ft)	14668.334



Peak Flow Hydrologic Analysis

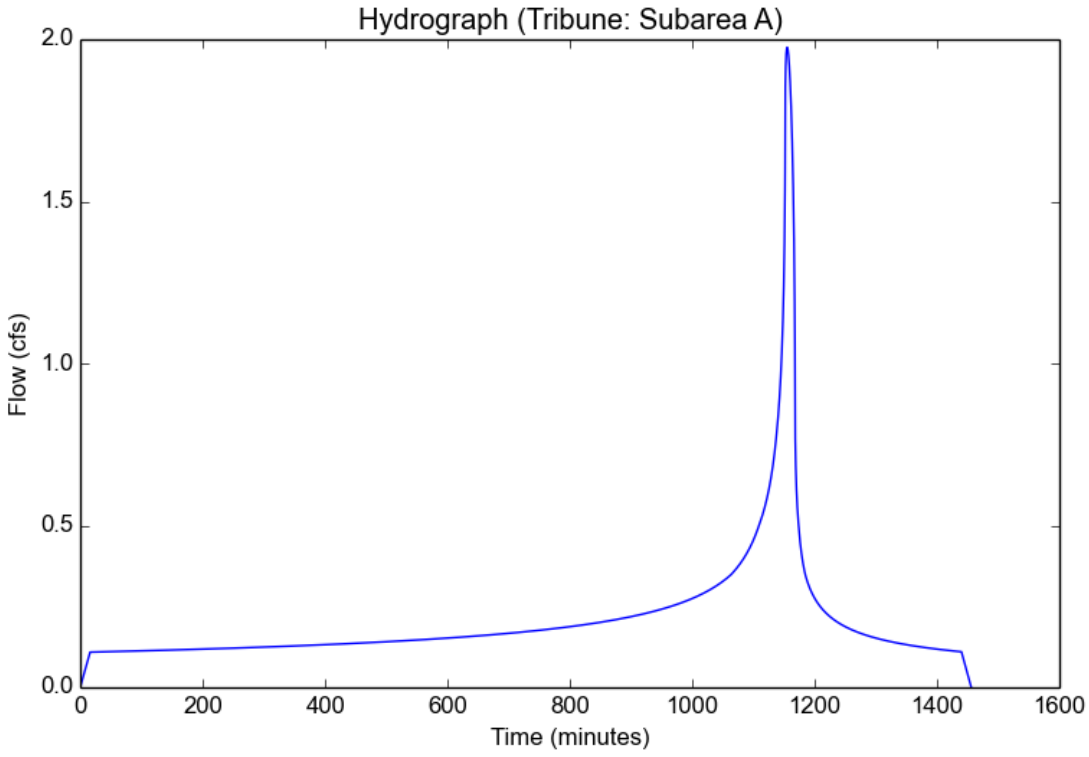
File location: W:/1TRI180200/ENGR/DOCS/EIR Hydrology Report/Hydro Calc/Tribune - Prop 25 Yr.pdf
Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Tribune
Subarea ID	Subarea A
Area (ac)	1.27
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.01
50-yr Rainfall Depth (in)	5.95
Percent Impervious	0.8
Soil Type	6
Design Storm Frequency	25-yr
Fire Factor	0
LID	False

Output Results

Modeled (25-yr) Rainfall Depth (in)	5.2241
Peak Intensity (in/hr)	1.8042
Undeveloped Runoff Coefficient (Cu)	0.7108
Developed Runoff Coefficient (Cd)	0.8622
Time of Concentration (min)	16.0
Clear Peak Flow Rate (cfs)	1.9755
Burned Peak Flow Rate (cfs)	1.9755
24-Hr Clear Runoff Volume (ac-ft)	0.4164
24-Hr Clear Runoff Volume (cu-ft)	18137.8283



Peak Flow Hydrologic Analysis

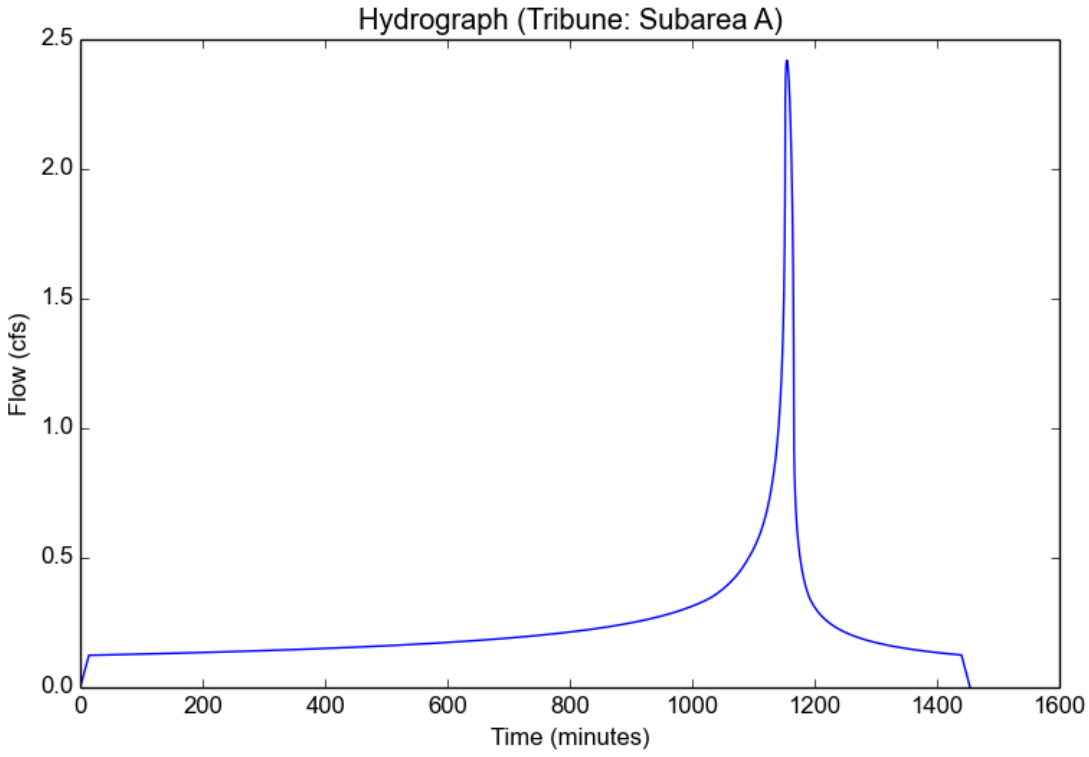
File location: W:/1TRI180200/ENGR/DOCS/EIR Hydrology Report/Hydro Calc/Tribune - Prop 50 Yr.pdf
Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Tribune
Subarea ID	Subarea A
Area (ac)	1.27
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.01
50-yr Rainfall Depth (in)	5.95
Percent Impervious	0.8
Soil Type	6
Design Storm Frequency	50-yr
Fire Factor	0
LID	False

Output Results

Modeled (50-yr) Rainfall Depth (in)	5.95
Peak Intensity (in/hr)	2.188
Undeveloped Runoff Coefficient (Cu)	0.7529
Developed Runoff Coefficient (Cd)	0.8706
Time of Concentration (min)	14.0
Clear Peak Flow Rate (cfs)	2.4192
Burned Peak Flow Rate (cfs)	2.4192
24-Hr Clear Runoff Volume (ac-ft)	0.4763
24-Hr Clear Runoff Volume (cu-ft)	20746.4618



Peak Flow Hydrologic Analysis

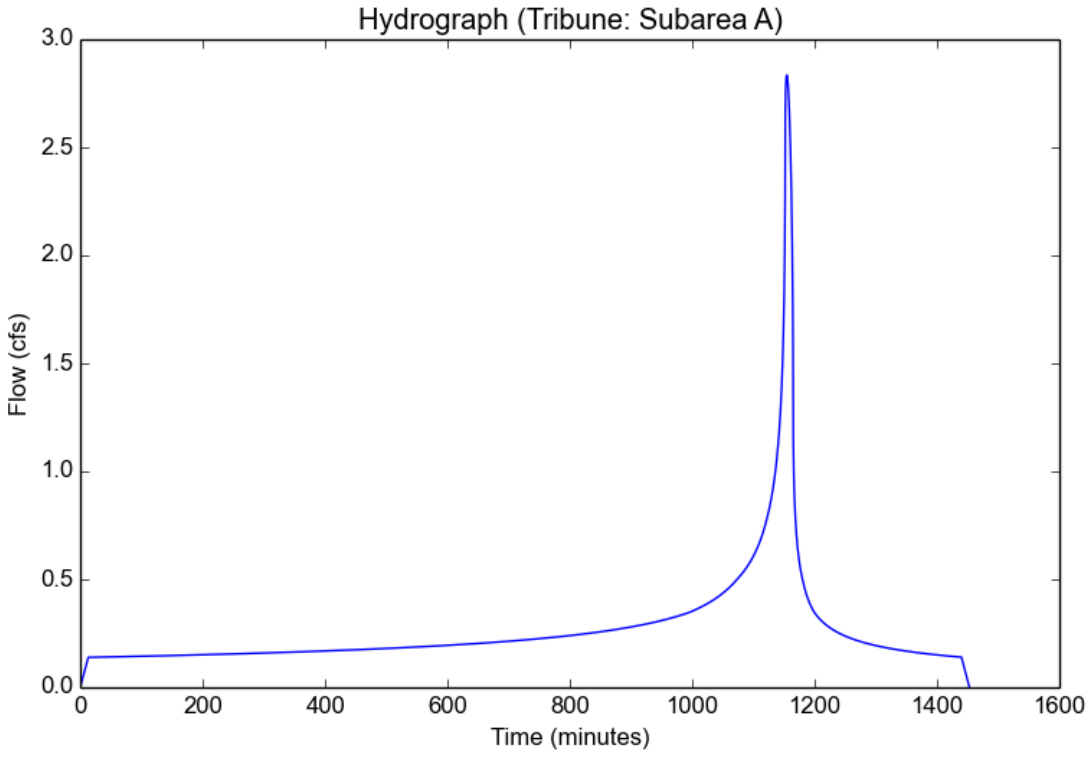
File location: W:/1TRI180200/ENGR/DOCS/EIR Hydrology Report/Hydro Calc/Tribune - Prop 100 Yr.pdf
Version: HydroCalc 0.3.0-beta

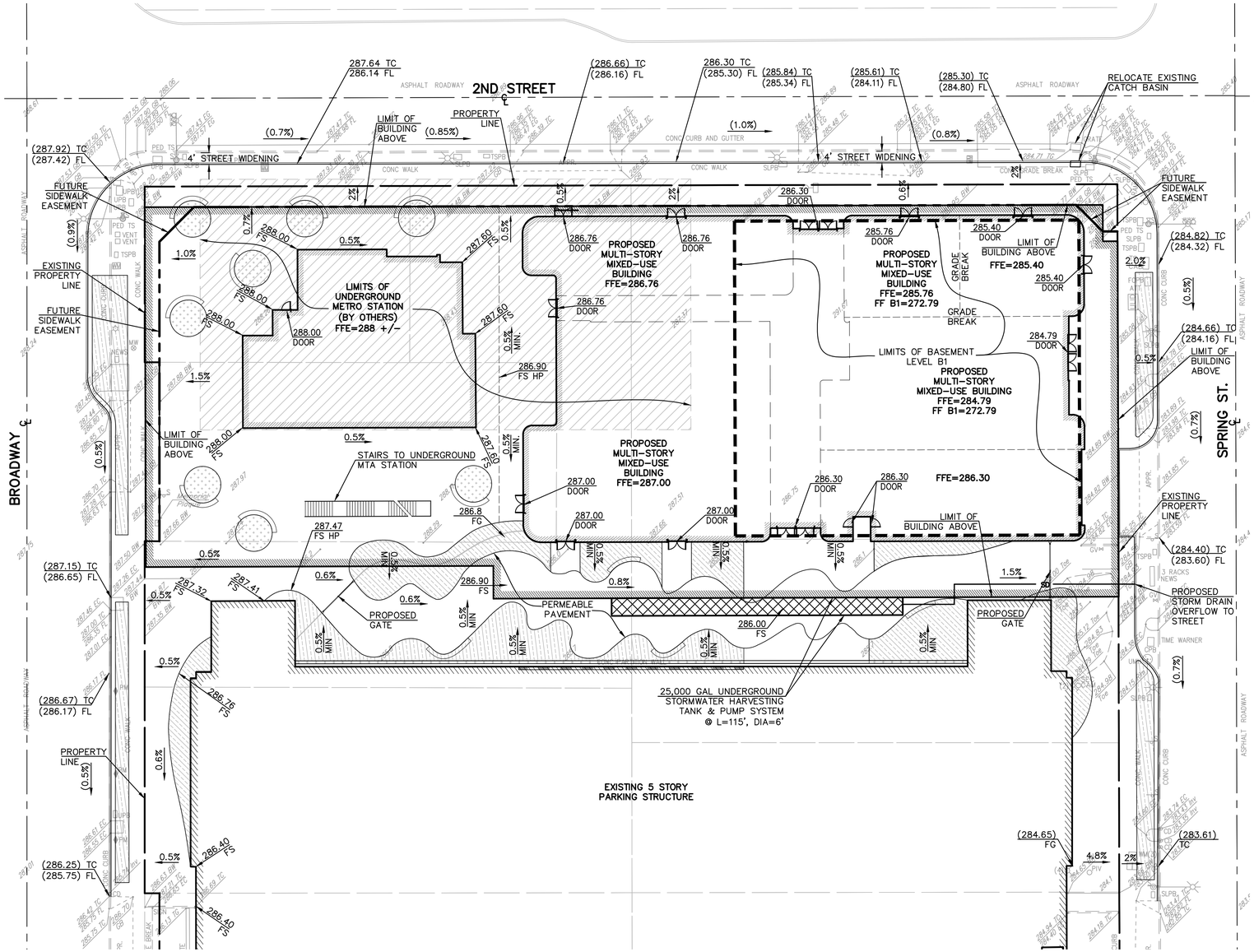
Input Parameters

Project Name	Tribune
Subarea ID	Subarea A
Area (ac)	1.27
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.01
50-yr Rainfall Depth (in)	5.95
Percent Impervious	0.8
Soil Type	6
Design Storm Frequency	100-yr
Fire Factor	0
LID	False

Output Results

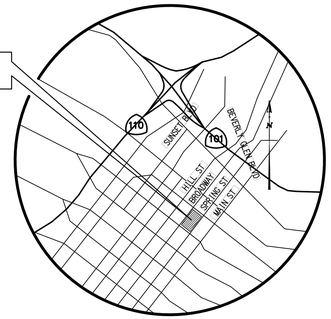
Modeled (100-yr) Rainfall Depth (in)	6.6759
Peak Intensity (in/hr)	2.542
Undeveloped Runoff Coefficient (Cu)	0.7901
Developed Runoff Coefficient (Cd)	0.878
Time of Concentration (min)	13.0
Clear Peak Flow Rate (cfs)	2.8346
Burned Peak Flow Rate (cfs)	2.8346
24-Hr Clear Runoff Volume (ac-ft)	0.5367
24-Hr Clear Runoff Volume (cu-ft)	23380.012





ABBREVIATIONS:

AC	–	ASPHALTIC CONCRETE
APN	–	ASSESSORS PARCEL NUMBER
BK.	–	BOOK
BW	–	BACK OF WALK
CD	–	CULVERT DRAIN
CONC	–	CONCRETE
℄	–	CENTER LINE
DRWY	–	DRIVEWAY
E.	–	EAST
EC	–	EDGE OF CONCRETE
EG	–	EDGE OF GUTTER
FFE	–	FINISHED FLOOR ELEVATION
FG	–	FINISHED GRADE
FL.	–	FLOW LINE
FS	–	FINISHED SURFACE
FT.	–	FOOT
HP	–	HIGH POINT
INV.	–	INVERT
N.	–	NORTH
NE.	–	NORTHEAST
NO.	–	NUMBER
NW.	–	NORTHWEST
PA	–	PLANTER AREA
PG.	–	PAGE
P.M.	–	PARCEL MAPS
PS	–	PARKING STALL
R	–	RADIUS
REF.	–	REFERENCE
RET	–	RETAINING
S.	–	SOUTH
S	–	SIGN
SE.	–	SOUTHEAST
S.F.	–	SQUARE FEET
SLPB	–	STREET LIGHT PULL BOX
SQ.	–	SQUARE
SW.	–	SOUTHWEST
TC.	–	TOP OF CURB
TG.	–	TOP OF GRATE
UP	–	UTILITY POLE
VLT	–	VAULT
W/	–	WITH
W.	–	WEST
WM	–	WATER METER



VICINITY MAP

NOT TO SCALE

LEGEND:

- EXISTING RIGHT-OF-WAY LINE
- LANDSCAPE AREA
- FLOW DIRECTION
- UNDERGROUND METRO STATION
- PROPOSED PROPERTY LINE
- EXISTING RIGHT-OF-WAY
- EXISTING BUILDING OUTLINE
- STREET CENTER LINE
- EXISTING EASEMENT LINE
- EXISTING CURB
- PROPOSED STORM DRAIN

PROJECT CONTACT INFORMATION

JOB ADDRESS:
213 S. SPRING STREET
LOS ANGELES, CA 90012

OWNER
CA-LATS SOUTH, LLC
202 WEST 1ST STREET
LOS ANGELES, CA 90012

ARCHITECT:
GENSLER
500 S FIGUEROA ST.
LOS ANGELES, CA 90071
PHONE: (213) 327-3600

CIVIL ENGINEER:
PSOMAS
555 S. FLOWER STREET, SUITE 4300
LOS ANGELES, CA 90071
PHONE: (213) 223-1400
CONTACT: DAVID J. CURTIS, P.E.

GENERAL NOTES:

1. PLUMBING SYSTEM TO ROUTE STORMWATER RUNOFF TO TANKS. RUNOFF TO BE PUMPED TO LANDSCAPED AREAS PER LANDSCAPE AND PLUMBING PLANS. CONNECTIONS FROM TANKS TO RAINWATER HARVESTING SYSTEM COMPONENTS AND LANDSCAPE PER PLUMBING AND LANDSCAPE PLANS.

ESTIMATED EARTHWORK QUANTITIES:

CUT 7000 CY. FILL 0 CY. EXPORT 7000 CY
OVEREXCAVATION AND RECOMPACTION @ 1' 472 CY.

THE ABOVE LISTED QUANTITIES REFLECT THE ENGINEER'S ESTIMATE OF THE EARTHWORK VOLUMES. 10% BULKING IS ASSUMED

THESE QUANTITIES ARE FOR INTERNAL DESIGN AND BIDDING PURPOSES ONLY, AND NOT FOR CONTRACT PURPOSES.

THE CONTRACTOR IS RESPONSIBLE FOR COMPUTING HIS OWN QUANTITIES.

PLAN
SCALE: 1" = 20'

20' 10' 0' 10' 20'
GRAPHIC SCALE

Gensler
500 S FIGUEROA ST
LOS ANGELES, CA 90071
T: 213.327.3600 F: 213.327.3601

CONSULTANT:
PSOMAS
555 Flower Street, Ste 4300
Los Angeles, CA 90071
t +213.223.1400
www.psomas.com

DATE 07/01/2016

SITE PLAN EXHIBIT

PROJECT NAME : TRIBUNE SOUTH PARCEL
PROJECT NUMBER
DESCRIPTION : MIXED USE
SCALE PER PLAN

C1.0

Appendix A.2

Notice of Preparation (NOP)

DEPARTMENT OF
CITY PLANNING

CITY PLANNING COMMISSION

DAVID H. J. AMBROZ
PRESIDENT

RENEE DAKE WILSON
VICE-PRESIDENT

ROBERT L. AHN
CAROLINE CHOE
RICHARD KATZ
JOHN W. MACK
SAMANTHA MILLMAN
VERONICA PADILLA-CAMPOS
DANA M. PERLMAN

ROCKY WILES
COMMISSION OFFICE MANAGER
(213) 978-1300

CITY OF LOS ANGELES
CALIFORNIA

ERIC GARCETTI
MAYOR

EXECUTIVE OFFICES
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801

VINCENT P. BERTONI, AICP
DIRECTOR
(213) 978-1271

KEVIN J. KELLER, AICP
DEPUTY DIRECTOR
(213) 978-1272

LISA M. WEBBER, AICP
DEPUTY DIRECTOR
(213) 978-1274

JAN ZATORSKI
DEPUTY DIRECTOR
(213) 978-1273

http://planning.lacity.org

January 25, 2017

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING

CASE NO.: ENV-2016-3809-EIR
PROJECT NAME: 222 West 2nd Project
PROJECT APPLICANT: CA-LATS South, LLC
PROJECT ADDRESS: 213 South Spring Street, 200–210 South Broadway, and 232–238 West 2nd Street, Los Angeles, CA 90012
COMMUNITY PLANNING AREA: Central City
COUNCIL DISTRICT: 14—José Huizar
DUE DATE FOR PUBLIC COMMENTS: 4:00 P.M. on February 24, 2017

Pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15082, once the Lead Agency decides an Environmental Impact Report (EIR) is required for a project, a Notice of Preparation (NOP) describing the project and its potential environmental effects shall be prepared. You are being notified of the intent of the City of Los Angeles, as Lead Agency, to prepare an EIR for the 222 West 2nd Project, which is located in an area of interest to you and/or the organization or agency you represent. The EIR will be prepared by outside consultants and submitted to the Department of City Planning, Major Projects Section, for independent review and certification.

The Department of City Planning requests your comments as to the scope and content of the EIR. Comments must be submitted in writing pursuant to directions below. If you represent an agency, the City is seeking comments as to the scope and content of the environmental information in the document which is germane to your agency's statutory responsibilities in connection with the Project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the Project.

A Scoping Meeting will be held on February 9, 2017, as detailed below. The Scoping Meeting will be in an open house format. **The Scoping Meeting is NOT the required public hearing for Municipal Code entitlement requests**; that hearing will be scheduled after completion of the EIR.

The environmental file for the Project is available for review at the Department of City Planning, 200 North Spring Street, Room 750, Los Angeles, CA 90012, during regular office hours, Monday–Friday from 8:00 A.M.–4:00 P.M. A copy of the Initial Study

prepared for the Project is not attached but may be viewed online at http://planning.lacity.org by clicking on the "Environmental Review" tab, then "Notice of Preparation & Public Scoping Meetings."

PROJECT LOCATION: The 2.71-acre Project Site is located in the Central City Community Plan area, more specifically in the Civic Center South area of Downtown Los Angeles, and is bounded by South Broadway on the west, West 2nd Street on the north, and South Spring Street on the east.

PROJECT DESCRIPTION: The Project involves the development of a 30-story mixed-use building consisting of 107 residential units (137,347 square feet), approximately 7,200 square feet of ground level commercial uses, and 534,044 square feet of office uses in Downtown Los Angeles. The Project Site also is the future site of the Los Angeles County Metropolitan Transportation Authority (Metro) Regional Connector 2nd Street/Broadway rail station (below grade) and an associated portal (at grade) located at the northwest corner of the site at 2nd Street and Broadway. The Metro station and portal are currently under construction. Overall, the Project's improvements (plus the Metro portal) would comprise a total of 688,401 square feet of floor area and would replace an existing surface parking lot located on the northern portion of the Project Site. An existing five-story parking structure is located on the southern portion of the Project Site and would provide automobile and long-term bicycle parking for the Project.

The proposed commercial spaces would be located on the ground level fronting 2nd and Spring Streets, as well as the interior of the site (i.e., facing the Metro portal and a pedestrian paseo), with a residential lobby and loading area located along Spring Street. Office space would be provided on levels 2 through 22, while the residential uses would be on levels 23 through 30. In accordance with Los Angeles Municipal Code (LAMC) Section 12.21.A4(p), parking within the existing parking structure would be reconfigured to provide 601 tenant vehicular parking spaces, and 0.25 space per residential unit of guest parking pursuant to Advisory Agency Parking Policy 2006-2, plus 218 long-term bicycle parking spaces for the Project, with substantial surplus parking remaining available for other nearby businesses and uses. An additional 68 short-term bicycle parking spaces would be provided elsewhere on-site.

A plaza surrounding the Metro portal would be integrated with a landscaped paseo located between the new building and the existing parking structure to the south, thus forming a large, public plaza at Broadway and 2nd Street that extends across the center of the site to Spring Street. In addition, amenity decks offering a variety of social and community spaces would be provided on various levels of the new building and would include landscaped terraces, rooftop gardens, and gathering spaces. Indoor and outdoor recreational spaces as well as private balconies also would be provided.

Project construction is expected to occur in one primary phase, with no overlap with construction of the Metro station and portal on-site. As the Metro Regional Connector line is forecasted to open in 2021, Project construction is anticipated to begin in 2022 and be complete by 2025. Construction activities would require approximately 7,000 cubic yards of grading, all of which would be exported off-site.

REQUESTED PERMITS/APPROVALS: The Applicant is requesting the following approvals from the City of Los Angeles:

- Vesting Zone Change to amend Ordinance No. 180,871 to eliminate or modify [Q] Condition No. 7 (regarding 30 percent minimum and 40 percent maximum lot coverage for the portion of buildings over 150 feet in height) to reflect the Project's proposed design (per LAMC Sections 12.32 G and 12.32 Q);
- Site Plan Review for a project with an increase of 50,000 square feet of non-residential floor area and 50 or more dwelling units (per LAMC Section 16.05);
- Design Overlay Plan Approval for a project in the Broadway CDO Zone (per LAMC Section 13.08 E);
- Vesting Tentative Tract Map No. 74320 for a 10-lot airspace subdivision for merger, resubdivision, and condominium purposes, with a request for haul route approval (per LAMC Section 17.01 and 17.15);
- Building Line Removal of 120 feet along the east side of Broadway, established by Ordinance No. 75,667 on October 16, 1935 (per LAMC Section 12.32 R); and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including but not limited to temporary street closure permits, grading permits, excavation permits, foundation permits, and building permits.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: Air Quality; Cultural Resources (historical, archaeological, and paleontological resources); Greenhouse Gas Emissions; Hazards and Hazardous Materials; Land Use and Planning; Noise; Population and Housing; Public Services (fire protection, police protection, schools, parks/recreation, and libraries); Transportation/Traffic; Tribal Cultural Resources; and Utilities (water, wastewater, solid waste, and energy). In addition, although impacts are anticipated to be less than significant, the EIR will analyze the following for informational purposes: Aesthetics (visual quality, views, light/glare, and shading). Other environmental areas addressed in the Initial Study and determined to result in no impacts, less than significant impacts, or less than significant impacts with mitigation measures imposed, will not be analyzed further in the EIR.

PUBLIC SCOPING MEETING DATE AND LOCATION: The Scoping Meeting will be held in an open house format on February 9, 2017, from 5:00 P.M. to 7:00 P.M. at Señor Fish (restaurant), located at 155 South Main Street, Los Angeles, CA 90012. The purpose of the Scoping Meeting is to solicit public comments regarding issues to be addressed in the Draft EIR. The Scoping Meeting will provide information regarding the Project and the anticipated scope of analyses to be contained in the Draft EIR. City staff, environmental consultants, and Project representatives will be available, but no formal presentation is scheduled. You may stop by at any time between 5:00 P.M. and

7:00 P.M. to view materials, ask questions, and provide written comments. The Department of City Planning encourages all interested individuals and organizations to attend this meeting. There will be no verbal comments or public testimony taken at the Scoping Meeting. Written comments may be submitted at the Scoping Meeting.

Date: **February 9, 2017**
Time: **5:00 P.M.–7:00 P.M.**
(Arrive any time between 5:00 P.M.–7:00 P.M.)
Location: **Señor Fish (restaurant)**
155 South Main Street
Los Angeles, CA 90012
(See attached map)
Free and ADA compliant parking will be available to Scoping Meeting attendees within the parking structure located at 213 South Spring Street.

The Department of City Planning welcomes all comments regarding the environmental impacts of the Project and the issues to be addressed in the EIR. All comments will be considered in the preparation of the EIR. **Written comments** must be submitted to this office by February 24, 2017. Written comments also will be accepted at the Scoping Meeting described above.

Please direct your comments to:

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

ACCOMMODATIONS: As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability. The Scoping Meeting location and associated parking are wheelchair accessible. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or services may be provided upon request. Other services, such as translation between English and other languages, also may be provided upon written request submitted a minimum of seven (7) working days in advance to: per.planning@lacity.org. Be sure to identify the language you need English to be translated to and indicate if the request is for oral or written translation services. If translation of a written document is requested, please include the document to be translated as an attachment to your email.

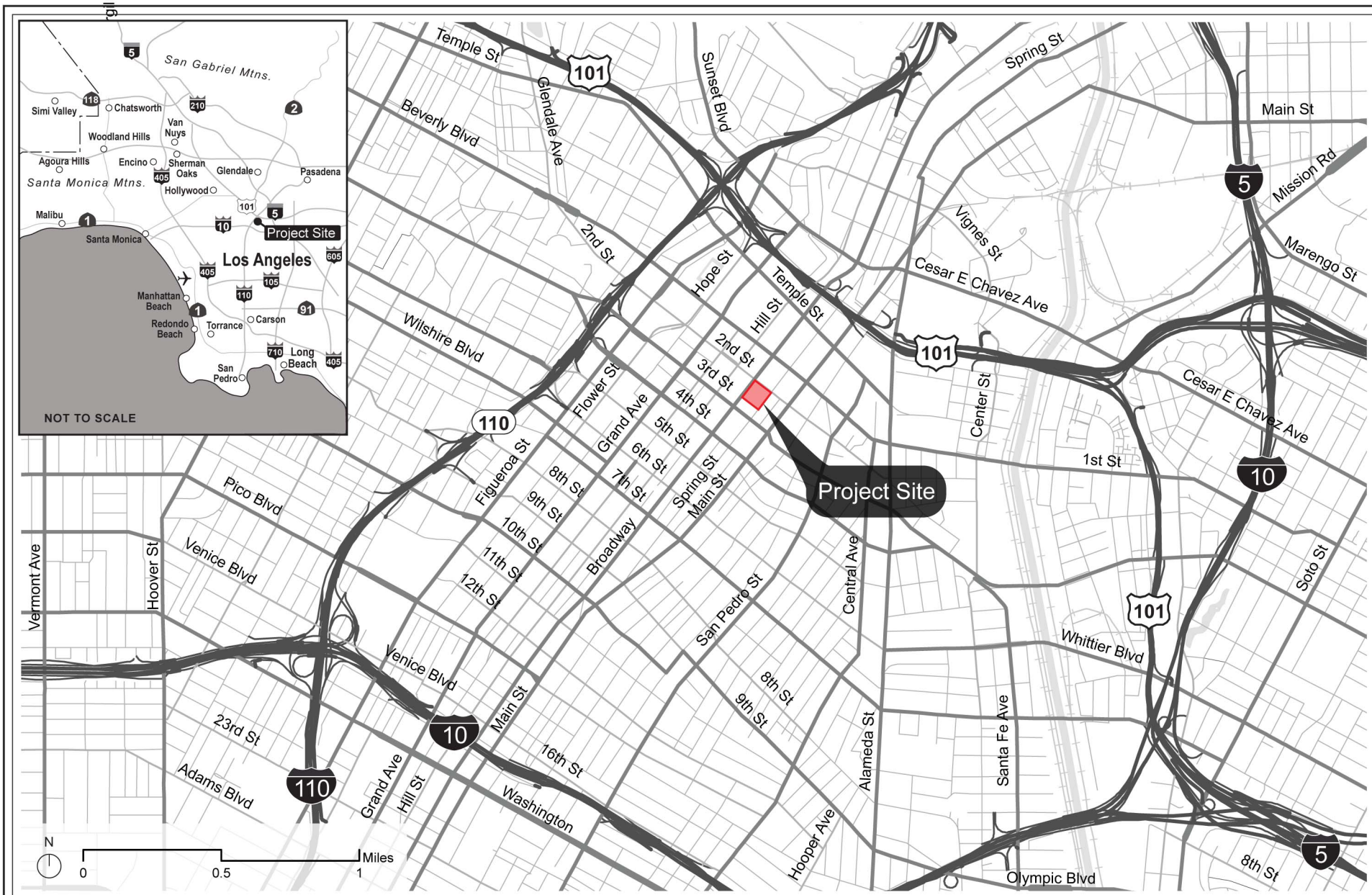
Como entidad cubierta bajo el Título II del Acto de los Americanos con Desabilidades, la Ciudad de Los Angeles no discrimina. La facilidad donde la junta se llevará a cabo y su estacionamiento es accesibles para sillas de ruedas. Traductores de Lengua de Muestra, dispositivos de oído, u otras ayudas auxiliaries se pueden hacer disponibles si usted las pide en avanzado. Otros servicios, como traducción de inglés a otros idiomas, también pueden hacerse disponibles si usted los pide por escrito con un mínimo de

siete (7) días en avanzado, por correo electrónico a: per.planning@lacity.org. Este seguro de identificar el idioma que usted necesite. Por favor indique si necesita servicios de traducción oral o en escrito. Si es traducción de un documento en escrito, por favor de incluir el documento que necesita ser traducido adjunto al correo electrónico. Si necesita información sobre este proceso, por favor llame a Darlene Navarrete al número (213) 978-1332.

Vincent P. Bertoni, AICP
Director of Planning

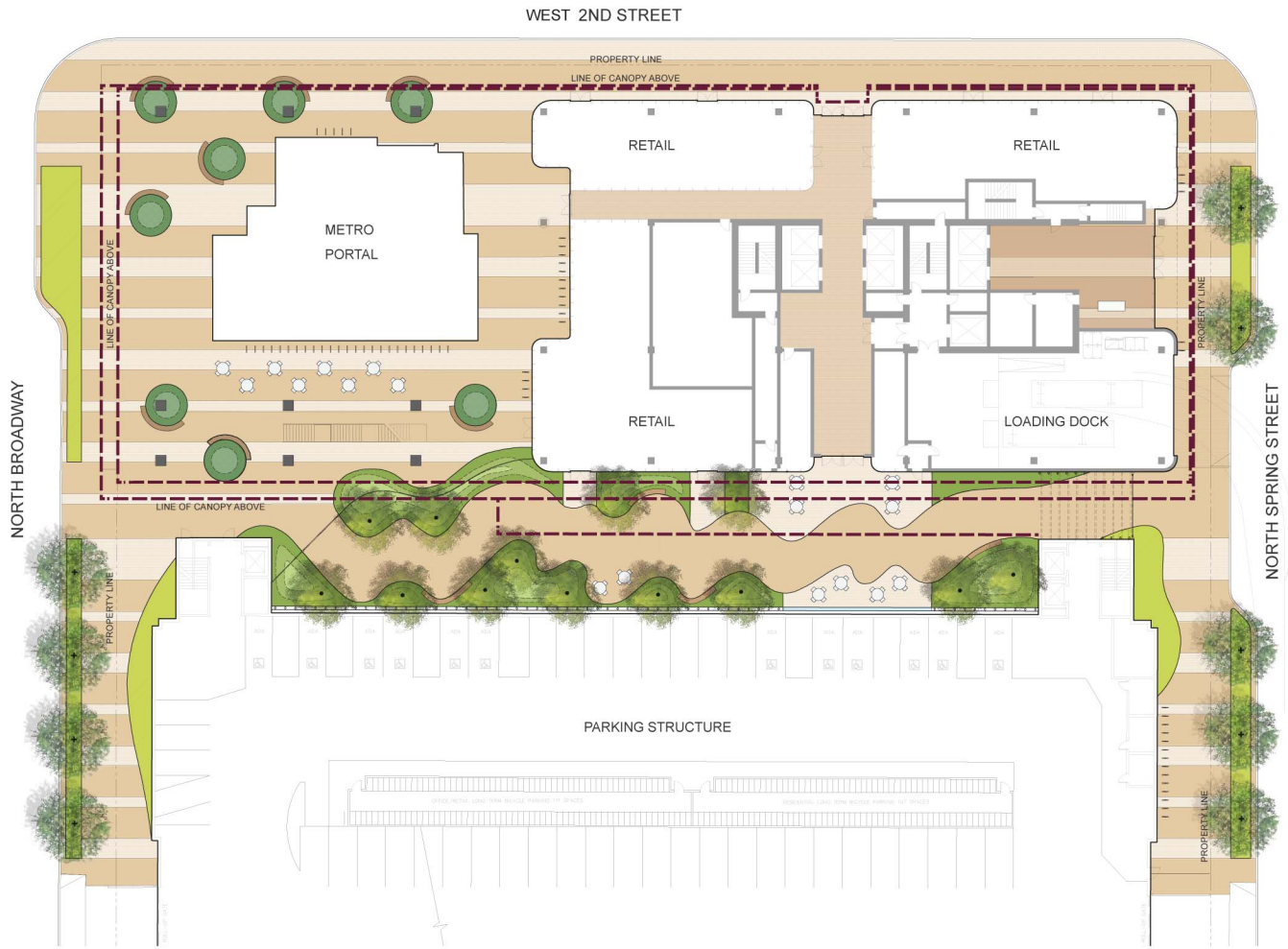
Kathleen King
City of Los Angeles Department of City Planning

Attachments:
Project Location Map
Ground-Level Conceptual Site Plan
500-Foot Radius Map
Scoping Meeting Location Map



Project Location Map

Source: LA GIS, 2016; Eyestone Environmental, 2016.



Building Canopy Lines

NO RT H

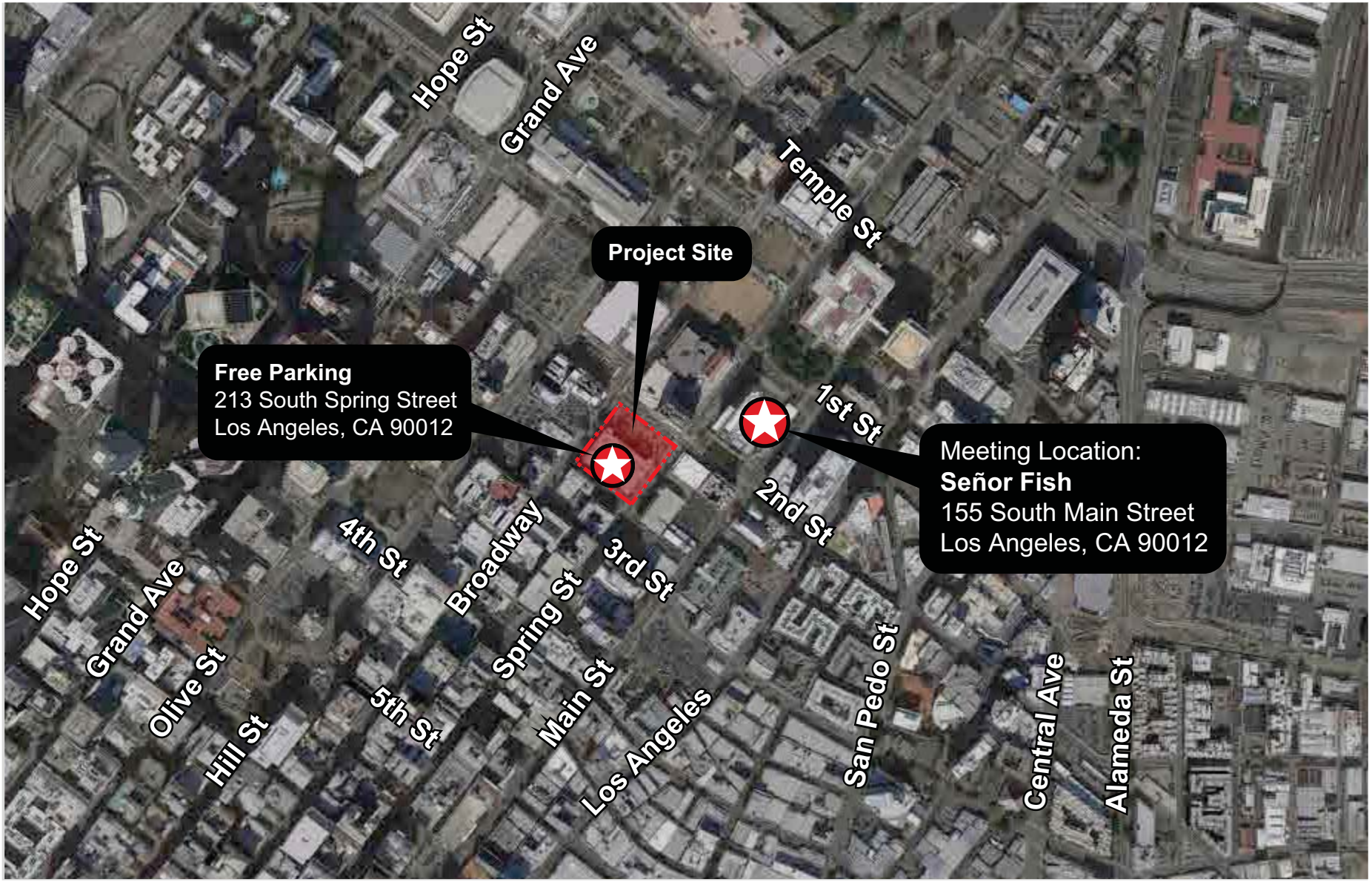
0' 16' 32' 64' 128'

Ground-Level Conceptual Site Plan

Source: Gensler, 2016.

500-Foot Radius Map

Source: GC Mapping Serivce, Inc., 2016.



Scoping Meeting Location Map

Source: Google Earth, 2016.

Appendix A.3

NOP Comment Letters

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

Notice of Preparation

January 25, 2017

To: Reviewing Agencies

Re: 222 West 2nd Project
SCH# 2017011062

Attached for your review and comment is the Notice of Preparation (NOP) for the 222 West 2nd Project draft Environmental Impact Report (EIR).

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

Please direct your comments to:

Kathleen King
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

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

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

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2017011062
Project Title 222 West 2nd Project
Lead Agency Los Angeles, City of

Type NOP Notice of Preparation

Description CA-LATS South, LLC proposes the 222 West 2nd Project, which involves the development of a 30-story mixed use building consisting of 107 residential units, approximately 7,200 sf of ground level commercial floor uses, and 534,044 sf of office uses in Downtown LA. The 2.71 acre project site, which is bounded by South Broadway on the west, West 2nd St on the north, and South Spring St on the east, also is the future site of the LA County Metro Regional Connector 2nd St/Broadway rail station. The 2nd St/Broadway rail station will be below grade, with a station portal at the northwest corner of the site at 2nd St and Broadway. The Metro station and portal are currently under construction. Overall, the project's improvements would comprise a total of 688,401 sf of floor area and would replace an existing surface parking lot on the northern portion of the project site. An existing five-story parking structure is located on the southern portion of the project site and would provide auto and long term bicycle parking for the project. The project also includes a plaza surrounding the Metro portal, which would be integrated with a landscaped paseo located between the new building and the existing parking structure to the south. In addition, amenity decks offering a variety of social and community spaces would be provided on various levels of the new building and would include landscaped, rooftop gardens, and gathering spaces. Indoor and outdoor recreational spaces as well as private balconies also would be provided.

Lead Agency Contact

Name Kathleen King
Agency City of Los Angeles
Phone (213) 978-1195 **Fax**
email
Address 200 N. Spring Street, Room 750
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Cross Streets West 2nd St and Broadway/West 2nd St and South Spring St
Lat / Long 34° 03' 06.6" N / 118° 14' 47.1" W
Parcel No. 5149-008-029, 087, 088, 089, 907, 908
Township 1S **Range** 13W **Section** 9 **Base**

Proximity to:

Highways US 101, SR 110, I 10
Airports
Railways Metro purple, red, expo, blue, g
Waterways LA River
Schools Various
Land Use Surface & structured parking/[Q]C2-4D-CDO-SN/Regional center commercial

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Drainage/Absorption; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects; Other Issues

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

Document Details Report
State Clearinghouse Data Base

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

Date Received 01/25/2017 ***Start of Review*** 01/25/2017 ***End of Review*** 02/23/2017

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

Appendix C

2017011062

Notice of Completion & Environmental Document Transmittal

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

SCH #

Project Title: 222 West 2nd Project

Lead Agency: City of Los Angeles Department of City Planning
Contact Person: Kathleen King, Planning Assistant
Mailing Address: 200 N. Spring Street, Room 750
Phone: (213) 978-1195
City: Los Angeles Zip: 90012
County: Los Angeles

Project Location: County: Los Angeles City/Nearest Community: Los Angeles/Central City
Cross Streets: West 2nd Street and Broadway / West 2nd Street and South Spring Street Zip Code: 90012
Longitude/Latitude (degrees, minutes and seconds): 34 ° 03 ′ 06.6 ″ N / 118 ° 14 ′ 47.1 ″ W Total Acres: 2.71
Assessor's Parcel No.: 5149-008-029, -087, -088, -089, -907, -908 Section: 9 Twp.: 1S Range: 13W Base:
Within 2 Miles: State Hwy #: US-101, SR-110, I-10 Waterways: Los Angeles River
Airports: Railways: Metro Purple, Red, Expo, Blue & Gold Lines; Metrolink; Amtrak Schools: Grand Arts HS, USC Hybrid HS, Central LA HS #9, CA Academy for Liberal Studies HS, Contreras ES, Downtown Bus. Magnet HS, Roybal Learning Ctr, Castelar ES, etc.

Document Type:

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

Governor's Office of Planning & Research
JAN 25 2017
STATE CLEARINGHOUSE

Local Action Type:

☐ General Plan Update ☐ General Plan Amendment ☐ General Plan Element ☐ Community Plan
☐ Specific Plan ☐ Master Plan ☐ Planned Unit Development ☒ Site Plan
☒ Rezone ☐ Prezone ☐ Use Permit ☒ Land Division (Subdivision, etc.)
☐ Annexation ☐ Redevelopment ☐ Coastal Permit ☒ Other: Design Overlay, Bldg. Line Removal

Development Type:

☒ Residential: Units 107 Acres
☒ Office: Sq.ft. 534,044 Acres Employees
☒ Commercial: Sq.ft. 7,200 Acres Employees
☐ Industrial: Sq.ft. Acres Employees
☐ Educational:
☐ Recreational:
☐ Water Facilities: Type MGD
☐ Transportation: Type
☐ Mining: Mineral
☐ Power: Type MW
☐ Waste Treatment: Type MGD
☐ Hazardous Waste: Type
☐ Other:

Project Issues Discussed in Document:

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

Present Land Use/Zoning/General Plan Designation:

Surface & Structured Parking / [Q]C2-4D-CDO-SN / Regional Center Commercial

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

CA-LATS South, LLC (Applicant) proposes the 222 West 2nd Project (Project), which involves the development of a 30-story mixed-use building consisting of 107 residential units (137,347 square feet), approximately 7,200 square feet of ground level commercial floor uses, and 534,044 square feet of office uses in Downtown Los Angeles. The 2.71-acre Project Site, which is bounded by South Broadway on the west, West 2nd Street on the north, and South Spring Street on the east, also is the future site of the Los Angeles County Metropolitan Transportation Authority (Metro) Regional Connector 2nd Street/Broadway rail station. The 2nd Street/Broadway rail station will be below grade, with a station portal at the northwest corner of the site at 2nd Street and Broadway. The Metro station and portal are currently under construction. Overall, the Project's improvements (plus the Metro portal) would comprise a total of 688,401 square feet of floor area and would replace an existing surface parking lot on the northern portion of the Project Site. An existing five-story parking structure is located on the southern portion of the Project Site and would provide automobile and long-term bicycle parking for the Project. The Project also includes a plaza surrounding the Metro portal, which would be integrated with a landscaped paseo located between the new building and the existing parking structure to the south. In addition, amenity decks offering a variety of social and community spaces would be provided on various levels of the new building and would include landscaped terraces, rooftop gardens, and gathering spaces. Indoor and outdoor recreational spaces as well as private balconies also would be provided.

NOP Distribution List

SB

County: Los Angeles

SCH# 2017011063

Resources Agency

- [x] **Resources Agency**
  Nadell Gayou
- [ ] **Dept. of Boating & Waterways**
  Denise Peterson
- [ ] **California Coastal Commission**
  Elizabeth A. Fuchs
- [ ] **Colorado River Board**
  Lisa Johansen
- [ ] **Dept. of Conservation**
  Crina Chan
- [ ] **California Energy Commission**
  Eric Knight
- [ ] **Cal Fire**
  Dan Foster
- [ ] **Central Valley Flood Protection Board**
  James Herota
- [x] **Office of Historic Preservation**
  Ron Parsons
- [x] **Dept of Parks & Recreation**
  Environmental Stewardship Section
- [ ] **California Department of Resources, Recycling & Recovery**
  Sue O'Leary
- [ ] **S.F. Bay Conservation & Dev't. Comm.**
  Steve Goldbeck
- [x] **Dept. of Water Resources**
  Resources Agency
  Nadell Gayou

Fish and Game

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

Other Departments

- [ ] **Food & Agriculture**
  Sandra Schubert
  Dept. of Food and Agriculture
- [ ] **Dept. of General Services**
  Cathy Buck
  Environmental Services Section
- [ ] **Delta Stewardship Council**
  Kevan Samsam
- [x] **Housing & Comm. Dev.**
  CEQA Coordinator
  Housing Policy Division

Independent Commissions,Boards

- [ ] **Delta Protection Commission**
  Erik Vink
- [ ] **OES (Office of Emergency Services)**
  Monique Wilber
- [x] **Native American Heritage Comm.**
  Debbie Treadway
- [x] **Public Utilities Commission**
  Supervisor
- [ ] **Santa Monica Bay Restoration**
  Guangyu Wang
- [ ] **State Lands Commission**
  Jennifer Deleong
- [ ] **Tahoe Regional Planning Agency (TRPA)**
  Cherry Jacques

Cal State Transportation Agency CalSTA

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

Dept. of Transportation

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

Cal EPA

Air Resources Board

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

Regional Water Quality Control Board (RWQCB)

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

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

Last Updated 1/17/17

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-6536
FAX (213) 897-1337
www.dot.ca.gov

Serious drought.
Help save water!

February 24, 2017

Ms. Kathleen King
City of Los Angeles
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

RE: 222 West 2nd Project
Vic. LA-101/PM 1.101
GTS# 07-LA-2017-00572ME NOP

Dear Ms. King:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project consists of the development of a 30-story mixed-use building consisting of 107 residential units, approximately 7,200 square feet of ground level commercial floor uses, and 534,044 square feet of office uses in Downtown Los Angeles.

Please refer to the Freeway Impact Analysis Screening Criteria Agreement, between the City of Los Angeles and Caltrans District 7, dated October 1, 2013 and Amendment dated December 15, 2015, to determine if a traffic impact analysis is necessary. If it is determined that this project is not required to conduct additional analysis of the freeway mainline and off ramps based on the screening criteria, a cumulative traffic analysis should still be conducted to determine if there will be a significant cumulative traffic impact on State Facilities when all future development projects are considered. Currently the freeway condition is operating near or at capacity.

However, if a traffic analysis is deemed necessary, it should be prepared prior to preparing the Draft Environmental Impact Report (DEIR). Please include the following components in your traffic analysis to assist us in evaluating the impacts of this project to State Transportation Facilities:

1. State highway facilities in the vicinity of this proposed project include US 101 and Interstate 110. Please analyze on/off ramps as well as main-line freeway segments within the project vicinity.

2. Traffic volume counts which include anticipated AM and PM peak-hour volumes.

3. Level of service (LOS) before, during construction, and after development.

4. Future conditions, which include both, project and project plus cumulative traffic generated up to General Plan build out year.

5. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts, including sharing of mitigation costs.

Caltrans would like to work with the City in an effort to evaluate traffic impacts, identify potential improvements, and establish a funding mechanism that helps mitigate cumulative transportation impacts in the project vicinity. Fair share funding contributions towards future improvements of State facilities will be accepted so long as it can be shown that such improvements are reasonably expected to be implemented in a reasonable time frame.

If you have any questions, please feel free to contact Miya Edmonson the project coordinator at (213) 897-6536 and refer to IGR/CEQA No. LA-2017-00572.

Sincerely,

DIANNA WATSON
Branch Chief
Community Planning & LD / IGR Review

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

March 10, 2017

Kathleen King, Planning Assistant
City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

RE: 222 West 2nd Project – Notice of Preparation of an Environmental Impact Report

Dear Ms. King,

Thank you for the opportunity to comment on the proposed 222 West 2nd development located at 213 South Spring Street, 200-210 South Broadway, and 232-238 West 2nd Street in the City of Los Angeles (Project). This letter conveys comments from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed Project.

Metro is committed to working with stakeholders across the County to support the development of transit oriented communities (TOCs). TOCs are built by considering transit within a broader community and creating vibrant, compact, walkable, and bikeable places centered around transit stations and hubs with the goal of encouraging the use of transit and other alternatives to driving. Metro collaborates with local municipalities, developers, and other stakeholders in land use planning and development efforts, and to find partnerships that support TOCs across Los Angeles County.

Project Description

The Project involves the development of a 30-story mixed-use building consisting of 107 residential units (137,347 square feet), approximately 7,200 square feet of ground level commercial uses, and 534,044 square feet of office uses. The Project site is also the future site of the below grade Metro Regional Connector Historic Broadway rail station (formerly 2nd/Broadway station) and an associated at grade portal located at the northwest corner of the site at 2nd Street and Broadway. Overall, the Project's improvements (plus the Metro portal) would comprise a total of 688,401 square feet of floor area and would replace an existing surface parking lot located on the northern portion of the Project Site. An existing five-story parking structure is located on the southern portion of the Project site and would provide automobile and long-term bicycle parking for the Project.

Metro Comments

Regional Connector Adjacency

It is noted that the Project site is in close proximity to the Metro Regional Connector subway tunnels and partially overlaps the Historic Broadway subway station. The tunnels and station are currently being constructed by Metro's contractor, Regional Connector Constructors (RCC). While Metro

strongly supports development near transit connections, the following concerns related to the Project's proximity to the subway tunnels and station should be addressed:

1. Metro entered into the following agreements with the Project sponsor to facilitate the construction of the subway station and tunnels: "Acquisition Agreement Regarding 2nd/Broadway Station Portal" (executed May 29, 2014), and "Construction Agreement and Right of Entry for Construction Purposed" (executed February 27, 2015). Metro expects that the Project sponsor will continue to comply with the terms of these agreements as well as the recorded Grant Deed (recorded March 3, 2015, Instrument No. 20150227042), collectively referred to as the "Agreements," including:

    a. The Project sponsor will accommodate Metro's station facilities including, but not limited to, exhaust, intake, and emergency ventilation/blast relief grates, hatches, exit hatches, water vaults and related infrastructure, and sidewalks;

    b. The sponsor's Project must be designed, constructed, and operated in such a way that ensures Metro and its patrons have clear, unobstructed sight lines and physical access to the station at all times;

    c. The Project sponsor shall at all times provide appropriate safety measures and protection to Metro's patrons from construction activities associated with the proposed Project;

    d. Project sponsor will not connect to Metro's station support walls or any part of station, portal, or plaza facilities without express written consent and approval by Metro of the Project sponsor's submitted architectural and engineering drawings;

    e. The columns from the Project sponsor's structure(s) will connect to the stem walls on Metro's station portal structure in a manner that does not restrict passenger circulation or access to fare gates, elevators, or escalators, unless Metro consents in writing to different locations for such columns;

    f. Beams supporting the Project sponsor's structure over Metro's station shall not be located within the airspace lot defined in the agreements, unless Metro otherwise consents in writing;

    g. The Project sponsor will be responsible for removing Metro's station canopy structures and any associated communication and electrical elements, including but not limited to cameras, public address speakers, electronic signage, static signage, and light fixtures. Plans for this removal and reinstallation must be approved by Metro, and the removal and any reinstallation must be overseen by the appropriate Metro personnel. Any equipment not required to be reinstalled shall be given to Metro.

        All station entrance and entrance canopy architectural elements and operational equipment that are altered or removed must be appropriately rationalized functionally and aesthetically with new or remaining elements, structures or features to Metro's satisfaction, and all affected architectural finishes must be restored or repaired in a manner acceptable to Metro. It is noted that artworks at the station portal glass walls are illuminated by lighting affixed to the station canopy outriggers. Emergency and normal lighting for the plaza and stairs/escalators is also integrated into canopy design. If canopy and associated lighting elements are removed, then new lighting design and fixture installation will be required as a result of this new development to ensure illumination levels at the plaza and stairs/escalators fulfill Metro's standards. If

vertical columns supporting the glass canopy are removed, remediation plans in keeping with Metro's standard station architectural materials and finishes will be required prior to commencement of this work. Remediation plans must be coordinated and approved by Metro. If columns remain, design for the integration of the remaining canopy columns into the structure above Metro's station must be coordinated and approved by Metro; and

h. The Project sponsor will provide Metro an exclusive construction right of entry and construction permit to facilitate the construction of subway station and tunnels for the durations defined in the Agreements.

2. The Project sponsor should be advised that the Metro Regional Connector subway may operate peak service as often as every four minutes in both directions and that trains may operate, in and out of revenue service, 24 hours a day, seven days a week, in the station and tunnels below and adjacent to the proposed Project.
3. The construction and operation of the proposed Project must not disrupt the operation and maintenance activities of the Metro Regional Connector Line or the structural and systems integrity of Metro's subway tunnels or station facilities.
4. Considering the proximity of the proposed Project to Metro's subway tunnels and station facilities, it is expected that rail operations may produce noise and vibration. A recorded Noise Easement Deed in favor of Metro is required prior to the completion and/or occupancy of the Project, a form of which is attached. In addition, any noise mitigation required for the Project must be borne by the developers of the Project and not Metro. The easement recorded in the Noise Easement Deed will extend to successors and tenants, as well.
5. Access to the station entry portal and the Metro station identifier shall not be obstructed or be in competition with vendor kiosks, advertising displays, pop-up stores, trees, landscaping or other such elements. Given the proposed location of the northwest most column on the plaza as well as the prominence of the new building's structure and height above the entry portal and plaza area, it will be necessary to relocate the Metro station identifier closer to the edge of the property line at 2nd Street and North Broadway on the Historic Broadway Station construction drawings with accompanying electric connection.
6. Consistent with ZI No. 1117, prior to the City issuing a building permit within 100 feet of Metro Rail, clearance shall be obtained from Metro. Metro must review construction plans and operations prior to any permits being issued. Metro will need to review the geotechnical report, structural foundation plans, sections, shoring plan sections and calculations. Please refer to the attached Metro "Design Criteria and Standards, Volume III - Adjacent Construction Design Manual" for more details regarding submitting drawings and calculations to Metro for review. Please note that Metro requires an Engineering Review Fee for evaluation of any impacts based on adjacency and relationship of the proposed building to the Metro existing structures.
7. Metro staff shall be permitted to monitor construction activity to ascertain any impact to the subway tunnels and station facilities.
8. The Project sponsor should be advised that Metro may request reimbursement for costs incurred as a result of Project construction/operation issues that cause delay or harm to Metro service delivery or infrastructure.

9. The Project sponsor will be required to notify Metro of any changes to the construction/ building plans that may or may not impact the subway tunnel and station facilities.
10. Metro Regional Connector Project Engineering should be contacted regarding the Project's potential impacts on the subway station structures and tunnels. Regional Connector Project Engineering can be reached at 213.893.7163 or by email at HarringtonM@metro.net.

Bus Stop Adjacency

Several Metro bus lines operate on S. Spring Street, W. 2nd Street, and S. Broadway Street, adjacent to the proposed Project. One Metro bus stop, on S. Spring Street between 2nd and 3rd Streets, is directly adjacent to the proposed Project. The following comments relate to bus operations and the bus stop:

1. Although the Project is not expected to result in any long-term impacts on bus operations, the developer should be aware of the bus facilities and services that are present. The existing Metro bus stop must be maintained as part of the final Project. During construction, the stop must be maintained or relocated consistent with the needs of Metro Bus Operations.

2. Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 regarding construction activities that may impact Metro bus lines at least 30 days in advance of initiating construction activities. For closures that last more than six months, Metro's Stops and Zones Department will also need to be notified at 213-922-5190 30 days in advance of initiating construction activities. Other municipal buses may also be impacted and should be included in construction outreach efforts.

3. Metro encourages the installation of bus shelters with benches, wayfinding signage, enhanced crosswalks with ADA-compliant ramps, as well as pedestrian lighting and shade trees in paths of travel to access transit stops and other amenities that improve safety and comfort for transit riders. The City should consider requesting the installation of such amenities as part of the development of the site.

4. Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.

Final design of the bus stop and surrounding sidewalk area must be compliant with the Americans with Disabilities Act (ADA) and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.

Transit Oriented Development

Considering the proximity of the Project to the future Historic Broadway station and numerous Metro bus lines, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of the developments. Metro encourages the City and Project sponsor to be mindful of the Project's intimate relationship with the Historic Broadway station, including orienting pedestrian

pathways toward the station and maintaining visibility of Metro artworks slated for the south and east glass portal station walls.

2. Metro would like to inform the Project sponsor of Metro's employer transit pass programs including the Annual Transit Access Pass (A-TAP) and Business Transit Access Pass (B-TAP) programs which offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. For more information on these programs, contact Devon Deming at 213-922-7957 or DemingD@metro.net.

3. The Environmental Impact Report should address first-last mile connections to transit, encouraging development that is transit accessible with bicycle and pedestrian-oriented street design connecting stations with housing and employment concentrations. For reference, we would like to direct City staff to view the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on line at: https://media.metro.net/docs/sustainability_path_design_guidelines.pdf

4. Metro encourages the Project sponsor to consider coordinating with Metro Bike Share program for potential Bike Share station at this development. Additionally, to ensure safe and convenient connections to/from the Project site for pedestrians and people riding bicycles, the sponsor should ensure that wayfinding signage for pedestrians, people riding bicycles, and transit users provides information such as nearby destinations, transit stops, bike facilities, etc.

5. Metro encourages the installation of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access the nearby bus stops and subway station. The City should consider requesting the installation of such amenities as part of the development of the site.

Congestion Management Program

Beyond impacts to Metro facilities and operations, Metro must also notify the applicant of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County," Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed Project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).

2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed Project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.

3. Mainline freeway-monitoring locations where the Project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.

4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions regarding this response, please contact Eddi Zepeda at 213-922-7658 or by email at DevReview@metro.net. Metro looks forward to reviewing the Draft EIR. Please send it to the following address:

Metro Development Review
One Gateway Plaza MS 99-23-4
Los Angeles, CA 90012-2952

Sincerely,

Nick Saponara
Senior Director, Joint Development

Attachments: Adjacent Construction Design Manual
CMP Appendix D: Guidelines for CMP Transportation Impact Analysis
Noise Easement Deed

ADJACENT CONSTRUCTION DESIGN MANUAL

1.0 INTRODUCTION

1.1 Parties planning construction over, under or adjacent to a Metropolitan Transportation Authority (MTA) facility or structure are advised to submit for review seven (7) copies of their drawings and four (4) copies of their calculations showing the relationship between their project and the MTA facilities, for MTA review. The purpose of the MTA review is to reduce the chance of conflict, damage, and unnecessary remedial measures for both MTA and the parties. Parties are defined as developers, agencies, municipalities, property owners or similar organizations proposing to perform or sponsor construction work near MTA facilities.

1.2 Sufficient drawings and details shall be submitted at each level of completion such as Preliminary, In-Progress, Pre-final and Final, etc. to facilitate the review of the effects that the proposed project may or may not have on the MTA facilities. An MTA review requires internal circulation of the construction drawings to concerned departments (usually includes Construction, Operations, Maintenance, and Real Estate). Parties shall be responsible for all costs related to drawing reviews by MTA. MTA costs shall be based upon the actual hours taken for review at the hourly rate of pay plus overhead charges. Drawings normally required for review are:

A. Site Plan

B. Drainage Area Maps and Drainage Calculations

C. Architectural drawings

D. Structural drawings and calculations

E. Civil Drawings

F. Utility Drawings

G. Sections showing Foundations and MTA Structures

H. Column Load Tables

I. Pertinent Drawings and calculations detailing an impact on MTA facilities

J. A copy of the Geotechnical Report.

K. Construction zone traffic safety and detour plans: Provide and regulate positive traffic guidance and definition for vehicular and pedestrian traffic adjacent to the construction site to ensure traffic safety and reduce adverse traffic circulation impact.

L. Drawings and calculations should be sent to:

MTA Third Party Administration (Permits Administration)
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, California 90012

1.3 If uncertainty exists on the possible impacts a project may have on the MTA facilities, and before submitting a formal letter requesting a review of a construction project adjacent to the Metro System, the party or his agent may contact the MTA Third Party Administrator (Permits). The Party shall review the complexity of the project, and receive an informal evaluation of the amount of detail required for the MTA review. In those cases, whereby it appears the project will present no risk to MTA, the Third Party Administrator (Permits) shall immediately route the design documents to Construction, Operations, Maintenance, and Real Estate departments for a preliminary evaluation. If it is then confirmed that MTA risk is not present, the Administrator shall process an approval letter to the party.

1.4 A period of 30 working days should be allowed for review of the drawings and calculations. Thirty (30) work days should be allowed for each successive review as required. It is noted that preliminary evaluations are usually produced within 5 working days.

1.5 The party shall reimburse the MTA for any technical review or support services costs incurred that are associated with his/her request for access to the Metro Rail System

1.6 The following items must be completed before starting any construction:

A. Each part of the project's design may be reviewed and approved by the MTA. The prime concern of the MTA is to determine the effect of the project on the MTA structure and its transit operations. A few of the other parts of a project to be considered are overhead protection, dust protection, dewatering, and temporary use of public space for construction activities.

B. Once the Party has received written acceptance of the design of a given project then the Party must notify MTA prior to the start of construction, in accordance with the terms of acceptance.

1.7 Qualified Seismic, Structural and Geotechnical Oversight

The design documents shall note the name of the responsible Structural Engineer and Geotechnical Engineer, licensed in the State of California.

2.0 REVIEW PROCEDURE

2.1 All portions of any proposed design that will have a direct impact on an MTA facility or structure will be reviewed to assure that the MTA facility or structure is not placed in risk at any time, and that the design meets all applicable codes and criteria. Any portion of the proposed design that is to form part of an MTA controlled area shall be designed to meet the MTA Design Criteria and Standards.

2.2 Permits, where required by the local jurisdiction, shall be the responsibility of the party. City of L.A. Dept. of Bldg. and Safety and the Bureau of Engineering permit review shall remain in effect. Party shall refer to MTA Third Party Administration policies and procedures, THD5 for additional information.

2.3 Monitoring of the temporary support of excavation structures for adjacent construction shall be required in all cases for excavations within the geotechnical zone of influence of MTA structures. The extent of the monitoring will vary from case to case.

2.4 Monitoring of the inside of MTA tunnels and structures shall be required when the adjacent

excavation will unload or load the MTA structure or tunnel. Monitoring of vertical and horizontal distortions will include use of extensometers, inclinometers, settlement reference points, tiltmeters, groundwater observation wells, tape extensometer anchor points and load cells, as appropriately required. Acceptable limits of movement will depend on groundwater conditions, soil types and also the length of service the stations and tunnels have gone through. Escorts will be required for the survey parties entering the Metro operating system in accordance with MTA Operating Rules and Procedures. An MTA account number will be established and the costs for the escort monitoring and surveying service will be billed directly to the party or his agent as in section 1.2.

2.5 The calculations submitted for review shall include the following:

A. A concise statement of the problem and the purpose of the calculation.

B. Input data, applicable criteria, clearly stated assumptions and justifying rationale.

C. References to articles, manuals and source material shall be furnished with the calculations.

D. Reference to pertinent codes and standards.

E. Sufficient sketches or drawing references for the work to be easily understood by an independent reviewer. Diagrams indicating data (such as loads and dimensions) shall be included along with adequate sketches of all details not considered standard by MTA.

F. The source or derivation of all equations shall be shown where they are introduced into the calculations.

G. Numerical calculations shall clearly indicate type of measurement unit used.

H. Identify results and conclusions.

I. Calculations shall be neat, orderly, and legible.

2.6 When computer programs are used to perform calculations, the following information shall accompany the calculation, including the following:

A. Program Name.

B. Program Abstract.

C. Program Purpose and Applications.

D. Complete descriptions of assumptions, capabilities and limitations.

E. Instructions for preparing problem data.

F. Instructions for problem execution.

G. List (and explanation) of program acronyms and error messages.

H. Description of deficiencies or uncorrected errors.

I. Description of output options and interpretations.

J. Sample problem(s), illustrating all input and output options and hardware execution statements. Typically, these problems shall be verified problems.

K. Computer printout of all supporting calculations.

L. The "User's Manual" shall also include a certification section. The certification section shall describe the methods and how they cover the permitted options and uses of the program.

2.7 Drawings shall be drawn, to scale, showing the location and relationship of proposed adjacent construction to existing MTA structures at various stages of construction along the entire adjacent alignment. The stresses and deflections induced in the existing MTA structures should be provided.

2.8 The short-term and long-term effects of the new loading due to the adjacent construction on the MTA structures shall be provided. The soil parameters and other pertinent geotechnical criteria contained in existing contract documents for the affected structure, plus any additional conditions shall be used to analyze the existing MTA structures.

2.9 MTA structures shall be analyzed for differential pressure loadings transferred from the adjacent construction site.

3.0 MECHANICAL CRITERIA

3.1 Existing services to MTA facilities, including chilled water and condenser water piping, potable and fire water, storm and sanitary sewer, piping, are not to be used, interrupted nor disturbed without written approval of MTA.

3.2 Surface openings of ventilation shafts, emergency exits serving MTA underground facilities, and ventilation system openings of surface and elevated facilities are not to be blocked or restricted in any manner. Construction dust shall be prevented from entering MTA facilities.

3.3 Hot or foul air, fumes, smoke, steam, etc., from adjacent new or temporary facilities are not to be discharged within 40 feet of existing MTA ventilation system intake shafts, station entrances or portals. Tunnel ventilation shafts are both intake and discharge structures.

3.4 Clear access for the fire department to the MTA fire department connections shall be maintained at all times. Construction signs shall be provided to identify the location of MTA fire department connections. No interruption to fire protection water service will be permitted at any time.

3.5 Modifications to existing MTA mechanical systems and equipment, including ventilation shafts, required by new connections into the MTA System, shall only be permitted with prior review and approval by MTA. If changes are made to MTA property as built drawings shall be provided reflecting these changes.

At the option of MTA, the adjacent construction party shall be required to perform the field tests necessary to verify the adequacy of the modified system and the equipment performance. This verification shall be performed within an agreed time period jointly determined by MTA and the Party on a case by case basis. Where a modification is approved, the party shall be held responsible to maintain original operating capacity of the equipment and the system impacted by the modification.

4.0 OPERATIONAL REQUIREMENTS

4.1 GENERAL

A. Normal construction practices must be augmented to insure adequate safety for the general public entering Metro Stations and riding on Metro Trains and Buses. Design of a building, structure, or facility shall take into account the special safety considerations required for the construction of the facility next to or around an operating transit system.

B. Projects which require working over or adjacent to MTA station entrances shall develop their construction procedures and sequences of work to meet the following minimum requirements:

1. Construction operations shall be planned, scheduled and carried out in a way that will afford the Metro patrons and the general public a clean, safe and orderly access and egress to the station entrance during revenue hours.

2. Construction activities which involve swinging a crane and suspended loads over pedestrian areas, MTA station entrances and escalators, tracks or Metro bus passenger areas shall not be performed during revenue hours. Specific periods or hours shall be granted on a case-by-case basis.

3. All cranes must be stored and secured facing away from energized tracks, when appropriate.

4. All activity must be coordinated through the MTA Track Allocation process in advance of work activity.

4.2 OVERHEAD PROTECTION - Station Entrances

A. Overhead protection from falling objects shall be provided over MTA facilities whenever there is possibility, due to the nature of a construction operation, that an object could fall in or around MTA station entrances, bus stops, elevators, or areas designed for public access to MTA facilities. Erection of the overhead protection for these areas shall be done during MTA non-revenue hours.

1. The design live load for all overhead protection shall be 150 pounds per square foot minimum. The design wind load on the temporary structures shall be 20 pounds per square foot, on the windward and leeward sides of the structure.

2. The overhead protection shall be constructed of fire rated materials. Materials and equipment shall not be stored on the completed shield. The roof of the shield shall be constructed and maintained watertight.

B. Lighting in public areas and around affected MTA facilities shall be provided under the overhead protection to maintain a minimum level of twenty-five (25) footcandles at the escalator treads or at the walking surface. The temporary lighting shall be maintained by the Party.

C. Wooden construction fencing shall be installed at the boundary of the areas with public access. The fencing shall be at least eight-feet high, and shall meet all applicable code requirements.

D. An unrestricted public access path shall be provided at the upper landing of the entrance escalator-way in accordance with the following:

1. A vertical clearance between the walking surface and the lowest projection of the shield shall be 8'-0".

2. A clear pedestrian runoff area extending beyond the escalator newel shall be provided, the least dimension of which shall be twenty (20) feet.

3. A fifteen (15) foot wide strip (other than the sidewalk) shall be maintained on the side of the escalator for circulation when the escalator is pointed away from a street corner.

4. A clear path from any MTA emergency exit to the public street shall be maintained at all times.

E. Temporary sidewalks or pedestrian ways, which will be in use more than 10 days, shall be7constructed of four (4") inch thick Portland cement concrete or four(4") inches of asphaltic concrete placed and finished by a machine.

4.3 OVERHEAD PROTECTION - Operating Right-of-Way Trackage

A. MTA Rail Operations Control Center shall be informed of any intent to work above, on, or under the MTA right-of-way. Crews shall be trained and special flagging operations shall be directed by MTA Rail Operations Control Center. The party shall provide competent persons to serve as Flaggers. These Flaggers shall be trained and certified by MTA Rail Operations prior to any work commencing. All costs incurred by MTA shall be paid by the party.

B. A construction project that will require work over, under or adjacent to the at grade and aerial MTA right-of-way should be aware that the operation of machinery, construction of scaffolding or any operation hazardous to the operation of the MTA facility shall require that the work be done during non-revenue hours and authorized through the MTA Track Allocation process.

C. MTA flagmen or inspectors from MTA Operations shall observe all augering, pile driving or other work that is judged to be hazardous. Costs associated with the flagman or inspector shall be borne by the Party.

D. The party shall request access rights or track rights to perform work during non-revenue hours. The request shall be made through the MTA Track Allocation process.-

4.4 OTHER METRO FACILITIES

A. Access and egress from the public streets to fan shafts, vent shafts and emergency exits must be maintained at all times. The shafts shall be protected from dust and debris. See

Exhibit A for details.

B. Any excavation in the vicinity of MTA power lines feeding the Metro System shall be through hand excavation and only after authorization has been obtained through the MTA Track Allocation process. MTA Rail Operations Control Center shall be informed before any operations commences near the MTA power system.

C. Flammable liquids shall not to be stored over or within 25 feet horizontally of MTA underground facilities. If installed within 25 to 100 feet horizontally of the structure, protective encasement of the tanks shall be required in accordance with NFPA STD 130. Existing underground tanks located within 100 feet horizontally of MTA facilities and scheduled to be abandoned are to be disposed of in accordance with Appendix C of NFPA STD 130. NFPA STD 130 shall also be applied to the construction of new fuel tanks.

D. Isolation of MTA Facilities from Blast

Subsurface areas of new adjacent private buildings where the public has access or that cannot be guaranteed as a secure area, such as parking garages and commercial storage and warehousing, will be treated as areas of potential explosion. NFPA 130, Standard for Fixed Guideway Transit Systems, life safety separation criteria will be applied that assumes such spaces contain Class I flammable, or Class II or Class III Combustible liquids. For structural and other considerations, isolation for blast will be treated the same as seismic separation, and the more restrictive shall be applied.

E. Any proposed facility that is located within 20 feet radius of an existing Metro facility will require a blast and explosion study and recommendations to be conducted by a specialist who is specialized in the area of blast force attenuation. This study must assess the effect that an explosion in the proposed non-Metro facility will have on the adjacent Metro facility and provide recommendations to prevent any catastrophic damage to the existing Metro facility. Metro must approve the qualifications of the proposed specialist prior to commencement of any work on this specialized study.

4.5 SAFETY REGULATIONS

A. Comply with Cal/OSHA Compressed Air Safety Orders Title 8, Division 1, Chapter 4, Subchapter 3. Comply with California Code of Regulations Title 8, Title 29 Code of Federal Regulations; and/or the Construction Safety and Health Manual (Part F) of the contract whichever is most stringent in regulating the safety conditions to be maintained in the work environment as determined by the Authority. The Party recognizes that government promulgated safety regulations are minimum standards and that additional safeguards may be required

B. Comply with the requirements of Chemical Hazards Safety and Health Plan, (per 29 CFR 1910.120 entitled, (Hazardous Waste Operations and Emergency Response) with respect to the handling of hazardous or contaminated wastes and mandated specialty raining and health screening.

C. Party and contractor personnel while within the operating MTA right-of-way shall

coordinate all safety rules and procedures with MTA Rail Operations Control Center.

D. When support functions and electrical power outages are required, the approval MUST be obtained through the MTA Track Allocation procedure. Approval of the support functions and power outages must be obtained in writing prior to shutdown.

5.0 CORROSION

5.1 STRAY CURRENT PROTECTION

A. Because stray currents may be present in the area of the project, the Party shall investigate the site for stray currents and provide the means for mitigation when warranted.

B. Installers of facilities that will require a Cathodic Protection (CP) system must coordinate their CP proposals with MTA. Inquiries shall be routed to the Manager, Third Party Administration.

C. The Party is responsible for damage caused by its contractors to MTA corrosion test facilities in public right-of-way.

End of Section

APPENDIX

D

GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."

D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).

D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

D.5.2 Selection of Horizon Year and Background Traffic Growth. Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

D.6 PROPOSED PROJECT TRAFFIC GENERATION

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

D.8.1 Intersection Level of Service Analysis. The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

D.8.3 Freeway Segment (Mainline) Analysis. For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

D.8.4 Transit Impact Review. CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- ❑ Evidence that affected transit operators received the Notice of Preparation.
- ❑ A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- ❑ Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both "peak hour" and "daily" refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- ❑ Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
  - ➢ Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
  - ➢ For each time period, multiply the result by one of the following factors:

    3.5% of Total Person Trips Generated for most cases, except:

    10% primarily Residential within 1/4 mile of a CMP transit center
    15% primarily Commercial within 1/4 mile of a CMP transit center
    7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
    9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
    5% primarily Residential within 1/4 mile of a CMP transit corridor
    7% primarily Commercial within 1/4 mile of a CMP transit corridor
    0% if no fixed route transit services operate within one mile of the project

  To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- ❑ Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction's TDM Ordinance measures, but other project specific measures.

- Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

D.9.1 Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$). The lead agency may apply a more stringent criteria if desired.

D.9.2 Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

D.9.3 Project Contribution to Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- Any project contribution to the improvement, and
- The means by which trips generated at the site will access the regional facility.

D.9.4 Transportation Demand Management (TDM). If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

D.10 REFERENCES

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.

RECORDING REQUESTED BY
AND WHEN RECORDED MAIL TO:

LOS ANGELES COUNTY METROPOLITAN
TRANSPORTATION AUTHORITY
Real Estate Department
Deputy Executive Officer - Real Estate
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Los Angeles, CA 90012-2932

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Public Agency - No Tax Statement

NOISE EASEMENT DEED

For valuable consideration, receipt of which is hereby acknowledged, **(Name of Owner)**, a _____ , for themselves, their heirs, administrators, executors, successors, assigns, tenants, and lessees do hereby grant, bargain, sell, and convey to the **LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY,** a public agency existing under the authority of the laws of the State of California ("Grantee"), its successors and assigns, for the use and benefit of the public and its employees, a perpetual, assignable easement in that certain real property in the City of Los Angeles, County of Los Angeles, State of California described in Exhibit "A" attached hereto and incorporated herein by this reference,

Said easement shall encompass and cover the entirety of the Grantors' Property having the same boundaries as the described Property and extending from the sub-surface upwards to the limits of the atmosphere of the earth, the right to cause in said easement area such noise, vibrations, fumes, dust, fuel particles, light, sonic disturbances, and all other effects that may be caused or may have been caused by the operation of public transit vehicles traveling along the Project right of way.

Grantor hereby waives all rights to protest, object to, make a claim or bring suit or action of any purpose, including or not limited to, property damage or personal injuries, against Grantee, its successors and assigns, for any necessary operating and maintenance activities and changes related to the Project which may conflict with Grantors' use of Grantors' property for residential and other purposes, and Grantors hereby grants an easement to the Grantee for such activities.

The granting of said Easement shall also establish the Grantors' right to further modify or develop the Property for any permitted use. However, Grantor's rights of development shall not interfere with the continued operation of Grantee's Project.

It is understood and agreed that these covenants and agreements shall be permanent, perpetual, will run with the land and that notice shall be made to and shall be binding upon all heirs, administrators, executors, successors, assigns, tenants and lessees of the Grantor. The Grantee is hereby expressly granted the right of third party enforcement of this easement.

IN WITNESS WHEREOF, the undersigned has caused its/their signature to be affixed this day of _____, 20___

By: _____
Name

By: _____
Name

(ATTACH NOTARY SEAL AND CERTIFICATE HERE.)

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT **CIVIL CODE § 1189**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)

County of _____)

On _____ before me, _____,

Date *Here Insert Name and Title of the Officer*

personally appeared _____

Name(s) of Signer(s)

_____,

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____

Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: _____ Document Date: _____

Number of Pages: _____ Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

☐ Corporate Officer — Title(s): _____

☐ Partner — ☐ Limited ☐ General

☐ Individual ☐ Attorney in Fact

☐ Trustee ☐ Guardian or Conservator

☐ Other: _____

Signer Is Representing: _____

Signer's Name: _____

☐ Corporate Officer — Title(s): _____

☐ Partner — ☐ Limited ☐ General

☐ Individual ☐ Attorney in Fact

☐ Trustee ☐ Guardian or Conservator

☐ Other: _____

Signer Is Representing: _____

CERTIFICATE OF ACCEPTANCE

This is to certify that the interest in the real property conveyed by the foregoing Grant Deed from **_____**, a **California Limited Partnership**, ("Grantor") to **LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY,** a public agency existing under the authority of the laws of the State of California ("LACMTA"), is hereby accepted by the undersigned on behalf of the LACMTA pursuant to authority conferred by resolution of the Board of Directors of the LACMTA, and the Grantee hereby consents to the recordation of this Deed by its duly authorized officer.

Dated this ____ day of _____, 20__

By: _____
Velma C. Marshall
Deputy Executive Officer - Real Estate

STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710
Fax (916) 373-5471
Email: nahc@nahc.ca.gov
Website: http://www.nahc.ca.gov
Twitter: @CA_NAHC

January 27, 2016

Kathleen King
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

sent via e-mail:
kathleen.king@lacity.org

RE: SCH# 2017011062; 222 West 2nd Project, Notice of Preparation for Draft Environmental Impact Report, Los Angeles County, California

Dear Ms. King:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a **separate category of cultural resources**, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (Pub. Resources Code § 21084.2). Please reference California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements**. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends **lead agencies consult with all California Native American tribes** that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws**.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
    a. A brief description of the project.
    b. The lead agency contact information.
    c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).

d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
   a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
   a. Alternatives to the project.
   b. Recommended mitigation measures.
   c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
   a. Type of environmental review necessary.
   b. Significance of the tribal cultural resources.
   c. Significance of the project's impacts on tribal cultural resources.
   d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
   a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
   b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
   a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
   b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:
    I. Planning and construction to avoid the resources and protect the cultural and natural context.
    II. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    I. Protecting the cultural character and integrity of the resource.
    II. Protecting the traditional use of the resource.
    III. Protecting the confidentiality of the resource.
c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
    a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
    b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
    c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

    This process should be documented in the Cultural Resources section of your environmental document.

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires **local governments** to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason,

we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have been already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
    a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
    b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
    a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
    b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
    c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

Please contact me if you need any additional information at gayle.totton@nahc.ca.gov.

Sincerely,

Gayle Totton, M.A., PhD.
Associate Governmental Program Analyst

cc: State Clearinghouse

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

January 27, 2017

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

Notice of Preparation of a CEQA Document for the
222 West 2nd Project

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

Air Quality Analysis

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

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

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

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

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at the following internet address: http://www.arb.ca.gov/ch/handbook.pdf. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Finally, should the proposed project include equipment that generates or controls air contaminants, a permit may be required and the SCAQMD should be listed as a responsible agency and consulted. The assumptions in the submitted Draft EIR would also be the basis for permit conditions and limits. Permit questions can be directed to the SCAQMD Permit Services staff at (909) 396-3385, who can provide further assistance.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Mitigation Measure resources are available on the SCAQMD CEQA Air Quality Handbook website: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook

Data Sources

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

The SCAQMD staff is available to work with the lead agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact Jack Cheng, Air Quality Specialist by e-mail at jcheng@aqmd.gov or by phone at (909) 396-2448.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Planning and Rules Manager
Planning, Rule Development & Area Sources

JC:JW
LAC170125-01
Control Number

FORM GEN. 160 (Rev. 8-12)

CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

DATE: February 6, 2017

TO: Vincent P. Bertoni, Director of Planning
Department of City Planning

Attn: Kathleen King, Planning Assistant
Department of City Planning

FROM: Ali Poosti, Division Manager
Wastewater Engineering Services Division
LA Sanitation

SUBJECT: **222 WEST 2ND PROJECT- NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT**

This is in response to your January 25, 2017 letter requesting a review of your proposed mixed-use project located at 213 S Spring St, 200-210 S Broadway, and 232-238 W 2nd St, Los Angeles, CA 90012. LA Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

WASTEWATER REQUIREMENT

LA Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvement projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
Proposed			
Residential: Studio	75 GPD	12 DU	900
Residential: 1-BDRM	110 GPD	42 DU	4,620
Residential: 2-BDRMS	150 GPD	40 DU	6,000
Residential: 3-BDRMS	190 GPD	13 DU	2,470
Commercial Use	50 GPD/1000 SQ.FT	7,200 SQ.FT	360
Office	120 GPD/1000 SQ.FT	534,044 SQ.FT	64,085
Total			**78,435**

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 8-inch line on Broadway. The sewage from the existing 8-inch line feeds into a 21-inch line on Main St. The flow from the 21-inch line on Main St feeds into a 24-inch line on Los Angeles St before discharging into a 24-inch sewer line on Maple Ave. Figure 1 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 8-inch line cannot be determined at this time without additional gauging.

The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	Broadway	*	177,633 GPD
21	Main St.	18	3.43 MGD
24	Los Angeles St.	21	4.70 MGD
24	Maple Ave.	35	4.13 MGD
24	Maple Ave.	15	4.07 MGD

* No gauging available

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the project.

If you have any questions, please call Eduardo Perez of my staff at (323) 342-6207.

STORMWATER REQUIREMENTS

LA Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

The project requires implementation of stormwater mitigation measures. These requirements are based on Stormwater Low Impact Development (LID) requirements. The projects that are subject to LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled "*Development Best Management Practices Handbook – Part B: Planning Activities*". Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lastormwater.org. It is advised that input regarding LID requirements be received in the early phases of the project from WPD's plan-checking staff.

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-away to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the LID requirements.

CONSTRUCTION REQUIREMENTS

The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturb more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction.

If there are questions regarding the stormwater requirements, please call Kosta Kaporis at (213) 485-0586, or WPD's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3rd Floor, Station 18.

GROUNDWATER DEWATERING REUSE OPTIONS

The Los Angeles Department of Water and Power (LADWP) is charged with the task of supplying water and power to the residents and businesses in the City of Los Angeles. One of the sources of water includes groundwater. The majority of groundwater in the City of Los Angeles is adjudicated, and the rights of which are owned and managed by various parties. Extraction of groundwater within the City from any depth by law requires metering and regular reporting to the appropriate Court-appointed Watermaster. LADWP facilitates this reporting process, and may assess and collect associated fees for the usage of the City's water rights. The party performing the dewatering should inform the property owners about the reporting requirement and associated usage fees.

On April 22, 2016 the City of Los Angeles Council passed Ordinance 184248 amending the City of Los Angeles Building Code, requiring developers to consider beneficial reuse of groundwater as a conservation measure and alternative to the common practice of discharging groundwater to the storm drain (SEC. 99.04.305.4). It reads as follows: "Where groundwater is being extracted

and discharged, a system for onsite reuse of the groundwater, shall be developed and constructed. Alternatively, the groundwater may be discharged to the sewer."

Groundwater may be beneficially used as landscape irrigation, cooling tower make-up, and construction (dust control, concrete mixing, soil compaction, etc.). Different applications may require various levels of treatment ranging from chemical additives to filtration systems. When onsite reuse is not available the groundwater may be discharged to the sewer system. This allows the water to be potentially reused as recycled water once it has been treated at a water reclamation plant. If groundwater is discharged into the storm drain it offers no potential for reuse. The onsite beneficial reuse of groundwater can reduce or eliminate costs associated with sewer and storm drain permitting and monitoring. Opting for onsite reuse or discharge to the sewer system are the preferred methods for disposing of groundwater.

To help offset costs of water conservation and reuse systems, LADWP offers the Technical Assistance Program (TAP), which provides engineering and technical assistance for qualified projects. Financial incentives are also available. Currently, LADWP provides an incentive of $1.75 for every 1,000 gallons of water saved during the first two years of a five-year conservation project. Conservation projects that last 10 years are eligible to receive the incentive during the first four years. Other water conservation assistance programs may be available from Metropolitan Water District of Southern California. To learn more about available water conservation assistance programs, please contact LADWP Rebate Programs 1-888-376-3314 and LADWP TAP 1-800-544-4498, selection "3".

For more information related to beneficial reuse of groundwater, please contact Greg Reed, Manager of Water Rights and Groundwater Management, at (213)367-2117 or greg.reed@ladwp.com.

SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Daniel Hackney of the Special Project Division at (213)485-3684.

EP/AP:as

Attachment: Figure 1 – Sewer Map

c: Kosta Kaporis, LASAN
Daniel Hackney, LASAN
Eduardo Perez, LASAN

Wastewater Engineering Services Division
LA Sanitation
City of Los Angeles

Figure 1
222 West 2nd Project
Sewer Map

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0 205 410 820 1,230 1,640
Feet

LOZEAU DRURY LLP

T 510.836.4200
F 510.836.4205

410 12th Street, Suite 250
Oakland, Ca 94607

www.lozeaudrury.com
richard@lozeaudrury.com

Via Email and U.S. Mail

March 8, 2017

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

Lisa M. Webber, AICP Deputy Director of Planning
City of Los Angeles
200 N. Spring Street, Room 525
Los Angeles, CA 90012-4801
lisa.webber@lacity.org

Planning Commission Secretary
Planning Commission
200 N. Spring Street, Room 532
Los Angeles, CA 90012-4801
cpc@lacity.org

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

Re: CEQA and Land Use Notice Request for the 222 West 2nd Street Project, SCH2017011062

Dear Ms. King, Ms. Webber, Ms. Wolcott, and Planning Commission Secretary:

I am writing on behalf of the Laborers International Union of North America, Local Union 300 and its members living in Los Angeles County and the City of Los Angeles ("LiUNA"), regarding the 222 West 2nd Street Project, (aka SCH2017011062 and Case No. ENV-2016-3809-EIR) including all actions related or referring to the development of a 30 story mixed use building consisting of 107 residential units, approximately 7,200 sf of ground level commercial floor uses, and 534,044 sf of office uses in Downtown LA on a 2.71 acre project site, bounded by South Broadway on the west, West 2nd St on the north, and South Spring St on the east, on APN's 5149-008-029, 087, 088, 089, 907, 908 ("Project").

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

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.

- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act ("CEQA"), including, but not limited to:

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

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

Please send notice by electronic mail or U.S. Mail to:

Richard Drury
Theresa Rettinghouse
Lozeau Drury LLP
410 12th Street, Suite 250
Oakland, CA 94607
510 836-4200
richard@lozeaudrury.com
theresa@lozeaudrury.com

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

Sincerely,

Theresa Rettinghouse
Paralegal
Lozeau | Drury LLP

Kathleen King <kathleen.king@lacity.org>

ENV-2016-3809-EIR 222 W. 2nd Street

1 message

Joan Beal <joan@joanbeal.net> Mon, Feb 27, 2017 at 11:39 AM
To: kathleen.king@lacity.org

Dear Ms. King—

I'm hoping to convey my husband and my concerns about the above referenced property to you, although I realize we are a bit late in our submission, due to our travels.

Composer Jeff Beal and I live in the historic 10 story Higgins building, overlooking this beautiful neighborhood.
We love the fact that the LA Times Building, City Hall and other neighborhood buildings have a very similar height and sensibility. It's what makes the historic district unique and different from the financial district.
In looking at the current rendering of the 30 story building which is being proposed for our immediate neighborhood, we are very concerned with how much taller this structure would be than its surroundings.

We certainly don't mind the blending of old and new architecture. Disney Hall is a perfect example of how modernist design can co-exist with historical buildings.
The Vibiano Lofts constructed next to the Cathedral are modernist, but their height makes them feel part of the surroundings.
The new metro station on the corner of Spring and 2nd will have a very similar height profile.

To place a 30 story building on this particular block feels absurd and extreme and out of character. It will affect the skyline and draw attention to itself, and away from the buildings in its area.
I hope that logic, aesthetics and sensibility will prevail, and this gigantic building will be brought done to size.

Thanks for your consideration. LA is growing and being revitalized, and we understand that noise, construction and changes are part of this process.
But future generations will appreciate how we protect our city's history, skyline and aesthetic.

Sincerely,

Joan and Jeff Beal
108 w. 2nd Street #1013
Los Angeles, CA
www.jeffbeal.com
(818) 317-0312

Kathleen King <kathleen.king@lacity.org>

re: case number ENV-2016-3809-EIR, project name: 222 West 2nd Street

1 message

Henry Chan <henschan@gmail.com> Fri, Feb 24, 2017 at 3:44 PM
To: kathleen.king@lacity.org
Cc: harrisyounger@aol.com

Hi Ms. Planning Assistant,

I have been an owner of a Higgins Building unit since 2009. I congratulate on all the construction work around in the area that has been completed over the years, greatly improving the environment and the quality of living in the neighborhood. However, I must speak against the proposal of the above project because of the many negativity impacts they have on the residents of this part of the city, and the City of Los Angeles as a whole.

From looking at the picture of the building, I feel it belongs not to the area, but somewhere with buildings that are more contemporary looking. The Higgins building is over 100 years old.There are reasons why this is a historic building and we just elected to pay a special assessment (over $20,000 for our share) to maintain it as such. Why so if we don't care about what will be done to the neighborhood, anything but keeping the historic charms of the area (historic core?). I will not talk for the City Hall and the old court house. Someone like yourself working there should know how everyone here feel about the proposal's impact to the view from all direction.

The Higgins Building does not have parking for most residents. They depend on the parking facilities in the area like the LA Times to park their vehicles.We are losing this facility as a result. Is the City planning for similar parking elsewhere as a result of the new building for residents like us and many others the project will attract?

I believe this project will take many more years to complete. Living next to this site and many other nearby projects in the pasts years is not the kind of living I want to experience. The project will further prolong the inconvenience to us all here. At my senior age, I am not sure if I live to see the end of it. Anything you can do to cut short the project will be much appreciated.

I have much more to talk about, but I do not want to dilute the points I just made here. Please advise us at Higgins what we can do to help. The notice this time is too short to co-ordinate our effort. I hope this is not intentional in favor of the builder.

Thank you.

Henry Chan
Unit 901, Higgins Building, W 2nd Street

February 9, 2017 500PM – 7:00PM

Public Scoping Meeting - Senor Fish

155 South Main Street LA CA 90012

I am a downtown loft owner.

I am an owner of a property management company. We manage Residential & Commercial properties.

I am the founder of Los Angeles Arts Alliance, a 501 C 3 organization that raises money to promote Art & Culture for students and artists in Los Angeles.

Regarding the 222 West 2nd Project (between Broadway & Spring Street)

CASE # ENV-2016-3809-EIR

As a loft owner with an eye view of the proposed project, that will inevitably alter my seven year view as my loft faces the proposed site I am in favor of it. Looking at the renderings I believe it will be a great addition to the current skyline. It is dramatic and different and pushes conformity.

As an owner of a property management company I as all of us are aware of the Downtown LA transformation. We need to bring architecture into the future while blending with the architecture of the old historic buildings.

As the Founder of Los Angeles Arts Alliance I am very excited for this property while viewing the colored renderings. About five years ago we did a photo essay of downtown Los Angeles with a group of high school students. The project was to show how old architecture of downtown and the current architecture would impact the future architecture of downtown Los Angeles. I tell young students to, ”define who you are do not be defined.” This rendering is not only an architecture masterpiece but it is inspiration to all architects. Think out of the box. I believe this building will be on the walking tours of downtown Lod Angeles. This project will inspire all of us to go after one’s dreams. The future is here and tis project needs approval.

Thank you, Peter Drivas 949/285-9919.

to

Color

February 6, 2017

Ms. Kathleen King, Planning Assistant
City of Los Angeles
Department of City Planning
200 N Spring Street, Room 750
Los Angeles, CA

David Fencl
257 S. Spring Street, Unit 3H
Los Angeles, CA 90012

Subject: 222 West 2nd Project

Dear Ms. King:

The subject 222 West 2nd Project should be required to provide all necessary parking within the footprint of the new development.

Additional podium floors should be designed into the project to meet all of the project's parking requirements.

The existing 5-story parking structure located at 213 S Spring Street is already at capacity.

Further, this structure is utilized by residents of nearby properties (Higgins, Douglas, Continental, El Dorado, Rowan, etc.) who would likely be impacted or displaced by this project.

In reference to the 213 S Spring Street structure, it's unclear what is meant in the Notice of Preparation of an EIR by "re-configured to provide 601 tenant vehicular parking spaces." The existing parking configuration is already very tight. Spaces are narrow. It's hard to imagine more spaces being shoehorned in and the layout becoming even more constrained.

There seems to be a notion among developers that new projects can be under-parked (or in this case "zero parked" on the subject site) based on emerging trends such as ride sharing and Millennial's perceived ambivalence toward driving and/or vehicle ownership. This is a misplaced and frankly unproven hypothesis, yet Planning Departments seem to be acquiescing to it.

In reality, parking in Downtown is growing scarce and increasingly expensive each year. Every new project compounds the problem. A car is a necessity in Los Angeles and this includes Downtown.

The developers of the proposed project need to create parking within the footprint of their project and not rely on the 213 S Spring structure. There will be resistance on the developer's part since parking generates far less revenue than office/retail/residential. Nevertheless, the LA City Planning Department should take a stand.

Sincerely,

David Fencl

Kathleen King <kathleen.king@lacity.org>

222 West 2nd Street

1 message

Marisa Garcia <marisa@marisagarcia.net> Fri, Feb 24, 2017 at 2:29 PM
To: kathleen.king@lacity.org
Cc: Marisa Garcia <marisa@marisagarcia.net>

Re: case number is ENV-2016-3809-EIR | 222 West 2nd Street

Good Afternoon Ms. King,
My name is Marisa Garcia and I am a resident at the Higgins Building located at 108 W. 2nd Street, located on the block next to the 222 W 2nd Street project.

I am writing to express some concerns I have with the size of the proposed project.

I am quite happy to hear to hear abut proposed development in our neighborhood, but take issue with the number of floors included in the building proposal. The historic City Hall is only one block north of this project and I believe should remain the stand-out focal point of this part of the city. A building of this size would set precedent allowing for future projects that may contribute to further obscure the sight line to our city's icon.

Apart from this, I am concerned with the general construction nuisances from surrounding projects. I live directly across the street from the project located beside Vibiana. Construction begins at 7am, 6 days a week, recently going until 7pm at night. This would is noisy, dusty and generally exhausting. The larger the building, I would imagine, the longer the length of the project and subjection to these elements.

I appreciate you taking the time to receive my correspondence.

Sincerely,
--
Marisa Garcia
626-383-1061
108 W 2nd Street
#907
Los Angeles, CA 90012
marisa@marisagarcia.net

Kathleen King <kathleen.king@lacity.org>

RE: 222 West 2nd Street

1 message

Kristopher Gee <kristophergee.filmmusik@gmail.com> Fri, Feb 24, 2017 at 11:47 AM
To: kathleen.king@lacity.org, David Moore <davidenochmoore@gmail.com>

To Ms. King,

After reviewing the talking points from the Higgins NIC concerning the proposed building project at 222 West 2nd Street, and from my, and my family's, own experience living in the neighbourhood as property owners in the Higgins building, I strongly oppose the project.

We are, and have been for years and years, constantly bombarded by noise, traffic, pollution and street closures from the constant construction surrounding us. The proposed project will only stress the neighbourhood more for those of us who live, work and pay taxes here.

The building design is aesthetically tone deaf and not in keeping with the scale and character of the historic core and it's construction will block many people's view permanently.

Oppose.

Thank you.

Kristopher Gee (Higgins Building Owner Unit #209)

ALLAN M. HARRIS Attorney at Law

108 West 2nd Street 1002 Los Angeles, CA 90012

Admitted New York and New Jersey

p | 212.966.4035 e | cheryl.younger@yahoo.com

Kathleen King, Planning Assistant
City of Los Angeles Department of City Planning
200 N. Spring street, Room 750
Los Angeles, CA 90012

Re: Case No., ENV-2016-3809-EIR
Project Name: 222 West 2nd Project **February 24, 2017**

Dear Ms. King,

I am a resident of the Higgins Building at 108 West 2nd Street, a block east of the subject premises. In accordance with the request of the Department of City Planning for comments relating to the preparation of an environmental impact statement, the following are my comments:

!. Parking

There is a serious lack of parking in the area. Residents of the area already have difficulty find a place to park. Given the construction of the Metro Station at 2nd and Broadway, there will be an increased local need for adequate parking.

The project utilizes the existing 5 story parking structure south of it to satisfy its parking requirements. This garage already provides the neighborhood with 1436 parking spaces. The project is estimated to take 601 of these spaces leaving reduced number of 835 available. The construction of the Metro Station at 2nd and Broadway has has already eliminated an approximately 250 parking spaces to build the station. The completion of the project will create a serious parking problem. The developers should be required to provide more public parking.

2. Aesthetics

The proposed building is a radically modern building out of scale with its surrounding neighborhood. There is no building in the near vicinity which mirrors its size and design. The overlay of large boxes is jarring to the senses. At 30 stories it will stick out like a sore thumb.

An initial study by the Department of City Planning describes the neighborhood as follows:

The Project Site is surrounded by a mix of commercial office, government and civic office, retail, and residential uses contained in a range of low-rise to high-rise buildings, which are physically separated from the Project Site by local roadways. Immediately to the west is an existing surface parking lot and 10-story office building fronting Broadway. To the immediate north across 2nd Street is Los Angeles Times Square, which includes an 11-story office building and a six-level parking structure fronting 2nd Street. East of the Project Site across Spring Street are single-story commercial buildings and a six-level parking structure. To the south is a surface parking lot and six-story apartment building (Hosfield Building) fronting Broadway, as well as a surface parking lot and five-story apartment building (Douglas Building Lofts) fronting Spring Street.

The Project Site lies at the northern end of the Broadway Theater and Entertainment District Community Design Overlay (CDO) area, where development is encouraged to reflect the overall vision of a cohesive, pedestrian-friendly, and vibrant entertainment, commercial, and mixed-use district. The immediate area is defined by several iconic buildings, both old and new, including the Bradbury Building to the south, the Los Angeles Times buildings and City Hall to the north, the new 11-story U.S. federal courthouse on Broadway between 1st and 2nd Streets, the 10-story Los Angeles Police Department (LAPD) Headquarters, and the 15-story Caltrans buildings to the north and east, respectively. Residential uses in the Project vicinity include the 50-unit Douglas Building Lofts at 257 South Spring Street, the 135-unit Higgins Building Lofts at 108West 2nd Street, and the seven-story, 40-unit Pan American Lofts at 253 South Broadway.

It should be noted that the Higgins Building is a 10 story building.

It is clear from a review of the surrounding area that the 30 story is out of scale with the surrounding area and will substantially degrade its existing visual character and quality of its site.

Standard 1C of the Broadway Theater District requires "scale, massing and proportions" that characterize the historic district. There is no such building in the surrounding area that matches the project in size or design. Standard 6D requires the tower above 150 feet have lot coverage of no less than 30% or more than 40%. This is admittedly not compliant and the proponent requires a variance. Variances are no excuse for aesthetic and size planning.

If one views the area running East to the Los Angeles River, you encounter Little Tokyo and the Arts District, growing and evolving neighborhoods that are harmonious, attractive and of lower scale.

Downtown is sufficiently built up that each section of the downtown has its own scale and character as noted. Out of scale buildings that destroy the character of individual sections as this project should be avoided.

Additionally, the effect of large and tall buildings on air quality, air flow and future climate temperature increase should be considered.

3. Aesthetic detriment to City Hall as an Architectural Monument.

Recent proposals in the area of City Hall of buildings far in excess of the height of City Hall, 28 stories, are troubling. The City Hall is a wonderful aesthetic feature of Los Angeles. Not only just in many movies, but in reality it stands perpetually as a splendid example of our city and its architectural beauty. Restrictions against buildings of the size that would mar its majesty in our skyline should be prohibited. Otherwise its incomparable majesty as an architectural masterpiece will be destroyed by a mish mash of tall barbaric monstrosities.

4. Denigration of the views of Historic Buildings.

As a corollary to the objection as to the destruction of the significance of City Hall in our skyline, is the further denigration of the ability of residents East of the project to view Disney Hall. Disney Hall is in tandem with City Hall as the two most prominent architectural achievements in Los Angeles. The integrity and visual contributions of historic buildings should be preserved and protected.

5. Excessive Intrusion of Noise and Poor Air Quality.

The residents of the Higgins Building have already been subjected to excessive noise and poor air quality from the construction by Metro of the Broadway and Second Street Metro Station. This will continue for another estimated five years, on top of which the residents will be subjected to another three years of construction of the proposed project with the same poor environmental effect of excessive noise and poor air quality. This is an unreasonable social result and should not be permitted.

Respectfully submitted,

Allan M. Harris, Esq.

The undersigned is a licensed attorney of the States of New York and New Jersey. He is a retired Municipal Court Judge (Fair Lawn N.J.), and former counsel to the Paterson New Jersey Zoning Board of Adjustment.

Kathleen King <kathleen.king@lacity.org>

ENV-2016-3809-EIR, 222 West 2nd Street

1 message

Ling Hung <ling.hung@gmail.com> Fri, Feb 24, 2017 at 12:25 PM
To: kathleen.king@lacity.org

Hi,

I'm a fourteen year resident at the Higgins Building. While I'm all for growth and general downtown growth, I think it needs to be thought out more carefully.

1. Parking. Loss of 601 spaces from 1436 in the LA times lot. As it is, parking is a HUGE issue, as residents of the higgins, we dont have any contracts in place with the local parking lots (including LA Times) and we are already unable to secure long-term parking. Even parking for guests is a HUGE issue. There is a major parking scarcity issue as it is, and existing parking is just being taken away with this new building/more residents. This new building needs to provide enough parking without taking away existing parking that is already scarce.

2. Excessive intrusion of noise and poor air quality. (5 years of Metro construction and 3 years of building the project.) With all the current construction going on, it's been proven that there has been poor management of these issues.

Best,
Ling Hung

Kathleen King <kathleen.king@lacity.org>

222 west 2nd St Building

1 message

KimMinah <minahchan@icloud.com> Fri, Feb 24, 2017 at 10:29 AM
To: kathleen.king@lacity.org

Dear , Mis, Katharine
I know this time you are busy time how ever give me a time very important of my life time .
My name is Minah Kim.
Oh my good nes !
No thank you !
We do not need that one !
Please do not build !
My respond is NO!

Dear . Kathleen
This morning I find this matter!
I'm living Higgins bldg. 12 years .
Oh NO!
I'm not good writing English letter but please under standing my heart
What I want say .
Do not build Ugly , Denigration of views of Historic Buildings
(City Hall Disney Hall and more)
Thank you ! Your truly .
God bless you

iPadから送信

Kathleen King, Planning Assistant
City of Los Angeles Department of City Planning
200 N. Spring street, Room 750
Los Angeles, CA 90012

Re: Case No., ENV-2016-3809-EIR
Project Name: 222 West 2nd Project February 23, 2017

Dear Ms. King,

My husband and I live in the Higgins building next door to the proposed 30 story building at 222 West 2nd St. We are very concerned about the proposed project, and I have listed our concerns for the neighborhood, quality of life, air quality, and historic integrity of the neighborhood. I appreciate your consideration of our concerns. I don't think that the proposed building is good for the neighborhood, but a different design that includes adequate parking for the new building and includes parking for Higgins and LA Times would help the situation. If the new building was in line with the area, for example – no taller than 10 stories like the surrounding area, and closer in line with literally every historic building in the area, this project could be a success.

1. Parking
   We don't have dedicated parking for the Higgins building and must park in Joe's parking next door that is already packed with office workers and party-goers each day. Since this project is not adding parking, there will be an immediate shortage of parking for us. As a woman in downtown, I'm not interested in parking blocks away and walking alone to my unit every day for my own safety. A new parking lot must be added to the project to sustain the current parking for workers and residents.
2. Historical Integrity
   The proposed building will not fit in with the historic area and buildings in the neighborhood with the modern design and 30 stories. The area has mostly 5-10 story buildings and a new modern building that is 3-6x taller than everything else does not keep the integrity of the nearby historic neighborhoods and size thresholds. This includes City Hall and the Disney Concert Hall which are beautiful buildings that add character and attract tourists to the area. This building would block the city views of these famous buildings.
3. Noise and Air Quality
   I've lived in my condo for 2 ½ years, and the noise and air quality have severely lowered our quality of life for about 2 years of that. I bought an expensive air filter and cannot open my windows until the construction is done because I'm unable to breathe the bad air without having serious breathing issues. If this massive building project starts, I would not be able to have the air quality improved until 2020 at the earliest.

Thank you for your time and consideration,

Rachel and Lucas Magasweran

Kathleen King <kathleen.king@lacity.org>

222 West 2nd Street Proposed Building Construction

1 message

DVM <dvm7@twc.com> Thu, Feb 23, 2017 at 10:20 AM
To: kathleen.king@lacity.org

Dear Ms. King,

I am writing to voice my strong disapproval of the proposed construction of a 30-Story High Rise Tower (Case No. ENV-2016-3809-EIR) at 222 West 2nd Street. I have lived and worked in the Civic Center area for nine years, and although I am generally in favor of development in the downtown area, including the Civic Center neighborhood, the proposal at issue here is completely out of line with the history, character, aesthetics, and charm of the Civic Center. A skyscraper in the heart of the government sector will obscure views of City Hall looking in, and Disney Concert Hall and the rest of the L.A. Skyline, looking out. Furthermore, the project will detrimentally affect parking in the area and increase congestion. What's more, it will add years to the exhausting construction already underway to complete the Metro Station. Such a proposal will certainly cause undue hardship on the residents who have had very little peace and quiet for a long time, and who have been patiently enduring the loud and disruptive ongoing construction.

What troubles me the most, I am currently traveling out of the country, and had I not heard today about this deadline through a friend, my voice and many other stakeholders' voices would not be heard by this Friday. Did the Department of City Planning give sufficient notice to all area stakeholders and provide forums for feedback? The day I was leaving, almost two weeks ago, I heard one person mention a meeting on this subject to be held that day, which I couldn't attend due to my international flight. I saw no signs, got no mail or email, and received no information on this subject from the developers, or more importantly, from the city department responsible for representing the concerns of the citizens of the neighborhood impacted by this massive development. If this project is imposed on us without due notice, dialogue, and respect from the developers and the city, I will be sorely disappointed as I expect more from our city leaders.

Many have invested much time, money, and effort over the last decade to make the Civic Center a great downtown neighborhood. Please give us an opportunity to be heard on this matter, and contribute to the decision-making process. My cell phone number is listed below, and I can also be reached at this email address. Please let me know if I can provide you with any more information, or if there are any opportunities for me to be heard further on this issue.

Sincerely,

Dayan Mathai
Higgins Building
562-547-2166 (cell)

Kathleen King <kathleen.king@lacity.org>

30 story building on 2nd street

1 message

Joel Miller <joelmillermd@gmail.com> Fri, Feb 24, 2017 at 9:23 AM
To: kathleen.king@lacity.org

Good day Ms. King, I am writing as a resident of the Higgins Building and as a downtown resident for fourteen years in opposition to project 222 West 2nd Street, a monstrosity of a building, a disregard to the design of the neighborhood, and poor planning by the developer.

This is a too-large, too tall building for the surround neighborhood, and overshadows our historic City Hall and LA Times Building. The intersections surround the building are already heavily congested and will produce a major traffic concern, particularly as City Hall and Grand Park are frequently used and only a block away.

Parking is a major concern as 601 parking spaces are planned to be demolished from the LA Times parking structure.

The LA Times Building is planned for a mixed-use building and will create even more congestion and need for parking spaces. No significant green space is included.

Thank you for the attention given my concerns.
Joel Miller MD

Kathleen King <kathleen.king@lacity.org>

Strongly Oppose 222 West 2nd Street

1 message

David Enoch Moore <davidenochmoore@gmail.com> Fri, Feb 24, 2017 at 12:34 PM
To: kathleen.king@lacity.org
Cc: Kristopher Gee <kristophergee.filmmusik@gmail.com>

Hi Kathleen,

Thank you for all your hard work at the Department of City Planning.

Upon review of the proposed 222 West 2nd Street project at the Higgins NIC community meeting, without doubt I add my name to the many people strongly opposing the project.

There is nothing this project would do to benefit the neighborhood - it is a nightmare of a project. Second Street is the borderline between the Historic Core and the Civic Center of Downtown Los Angeles, it is not a playground for mediocre design/architecture firms trying to lay ground in DTLA's community development and reimagination. The scale, design, aesthetics, color are all out of line with the area and neighborhood. It would be a disservice to those of us tax-paying citizens living in the Historic Core if the project were completed. Send this project away, or at least to LA Live where it belongs.

As a DTLA Historic Core small business owner and resident, I strongly oppose.

Thank you ever so much.

David Enoch Moore (Higgins Building Unit #209)

Kathleen King <kathleen.king@lacity.org>

Case No.: ENV-2016-3809-EIR

1 message

Phil Orona <porona@earthlink.net> Fri, Feb 24, 2017 at 3:32 PM
Reply-To: Phil Orona <porona@earthlink.net>
To: kathleen.king@lacity.org

Kathleen King, Planning Assistant
City of Los Angeles Department of City Planning
200 N. Spring street, Room 750
Los Angeles, CA 90012

Re: Case No.: ENV-2016-3809-EIR

Dear Kathleen,

I am writing to express my concern regarding the proposed new project at:
222 West 2nd Street
Located in downtown Los Angeles

My concerns with this project include:

1. Scope and Size
The proposal is for a 30-story building, which I feel is totally out of proportion with the surrounding area. A building of this size would rival that of our landmark and historic City Hall, which is just a block away. There are no other buildings close to 30-stories in the nearby area, and this new proposed building would greatly distract from City Hall, as well as become the most obtrusive building in this historic district. I feel that new building projects in the area should respect the zone they are in, and the heights of other buildings around them.

2. Aesthetics
Besides the sheer size of this new building project, it also does not fit in at all with the historic nature of the area. With many other landmark buildings around it, including the Douglas Building, the Bradbury Building, and the Higgins Building, this new project would dwarf all of those, and become the new focal of the existing historic area. The look and feel of it does not match the historic area it is proposed to be in.

3. Traffic
As a long-time resident in the area, I can attest to the fact that traffic has become progressively worse each year as the population density in the area increases. This new building would add to that exponentially, due to the sheer size of it. It has become hard to get in and out of the downtown area now in the morning and evenings, as our rather narrow streets do not support the new density. A building of this size with all of its tenants and occupants would only make that much worse.

4. Parking
We already have major parking issues, which have become worse each year as more people live and work in downtown. This new project would cause many local residents and other commuters who park there now to have to find other parking, as well as create a huge demand for additional parking as the existing parking structure is used up by the new businesses, residents, and their visitors. The existing parking structure there has a waiting list which I have signed up for over a month ago, and am still waiting for a call. I can imagine how much worse the situation would be with 30 stories of new businesses and residents on that relatively small space of land.

In short, I feel that this area of land, which is already designated for the new metro station, would better serve our community as extra space in the area, or a building project that at most is the same size as the buildings around it. We really need help from the city to keep our area from becoming so congested that our quality living and working degrades to the point of becoming a nightmare. We also hope that the city planners will consider the historic nature of the area, and fight hard to help preserve it.

Thank you.

Best Regards,

Phil Orona
108 W. 2nd St. #406
Los Angeles, CA, 90012

Kathleen King <kathleen.king@lacity.org>

Case #: Env-2016-3809-EIR | 222 West 2nd St.

1 message

Dana Reid <danajreid@gmail.com> Thu, Feb 23, 2017 at 11:27 PM
To: kathleen.king@lacity.org

Hello Ms. King,

My name is Dana Reid and I am a resident of the Higgins Building for 12 years now. My unit, 709, looks directly down onto the Metro Construction site. I write this letter this evening to communicate the exponential degradation of my quality of life over the past 5 years and how the Metro construction has directly effected reduced the options available to my wife and I.

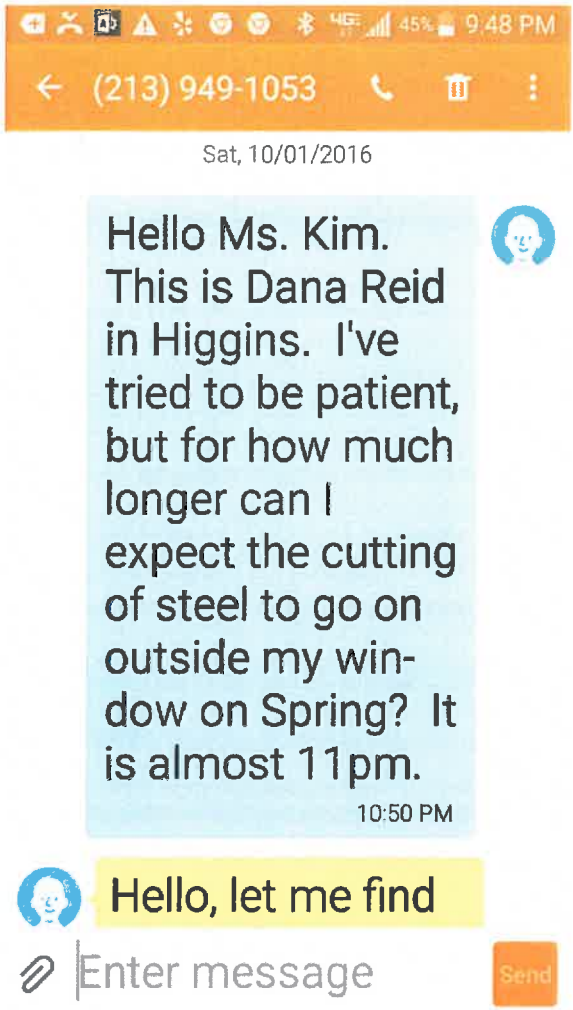
Should the city approve the development of a 30 story tower over Metro, the city will be directly responsible for "imprisoning" my wife and I in our condo for 8 years or more. Can we sell, no not at the value we should get for the unit, due to the construction site right outside. Can we rent, who wants to rent with consistent construction noise. Can we tolerate it, well we can no longer work from home, which our jobs afforded us the opportunity to do.

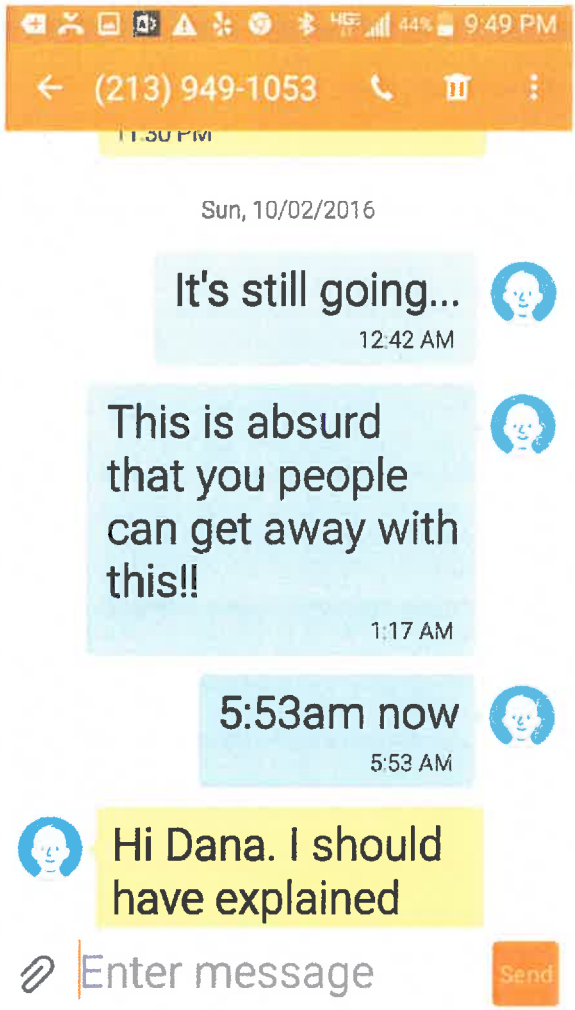
2-3 years of Metro construction followed by another 5 years of construction for 222 West 2nd St, this is not about my view, this is not about my distaste of the architectural design, this is about how you can prevent me from selling or renting my place for proper value for 8 years, while simultaneously forcing me to live through the noise and filth of a two major construction developments outside my window.

METRO

- In short, we have endured the consistent construction of 2 -3 shift crews outside our window for 2 years now. For 7 days a week we are unable to open our windows converse quietly, read a book or watch TV without the sounds of excavators, drills, chop saws, etc. going 7 days a week. Even as a I write this now at 11:30pm, I am listening, through closed windows, to the constant running of a motor from construction crane, generator and an excavator. This has been my life for a year and will be my life for another year, probably two. Please find two recent night and day pictures from my window to provide a visual reference below.

- Mind you, these are just not whining complaints, we are talking Saturday Nights, Friday nights, Sunday Mornings, all week... never is there a moment to unwind from a bad day. Here is an example of just one texting session screen with Metro Community Relations Contact, Young-gi Kim





- On a rare occasion when we can endure the construction noise and open a window, the dirt and dust flows right in. Downtown dirt and soot is one thing, but compiled with the construction soot, it is a constant practice of wiping down our table tops and window sills.

DTLA Quality of Life

As I stated, I have lived in Higgins fro 12 years. Downtown life works for me. I work 2 blocks away on 4th and Spring. However, at some point we need our city to recognize that we came to DTLA with the promise of Live, Work, Play. Today I am telling you that the Live portion of that equation has sorely been lacking for some time.

- we've endured the old CALTrans demo and LAPD construction
- LAPD officers who consistently and continually occupy our loading zones after years of imploring them not to
- constant regular street closures for protests (you never know what streets you can take to get home)
- constant regular street closures for filming
- constant regular street closings for city endorsed events
- an increase in homelessness, marked by encampments at LAPD, CalTrans, outside Higgins, etc.
- an increase in mentally ill individuals, many schizophrenic and aggressive
- an increase in human excrement on our sidewalks
- increased parking meter fees and enforcement
- diminished capacities for public parking
- I am sure there is much more that I'm failing to mention

In sum, I ask you how much do you think a person can take? I am a New Yorker, I grew up in city living, but you are pushing even me, an extremely tolerant and patient person, to a point of no return. Unfortunately, the city has backed me into a corner whereby I don't even have the option to sell or rent at what should be my market value.

What you are intending on putting my wife and I though is cruel punishment and does nothing at all to support those early adopters who moved downtown to help start this community, who've paid 12 years of property taxes and believed in the promise of Live, Work, Play.

--
Dana J. Reid
danajreid.com

Kathleen King <kathleen.king@lacity.org>

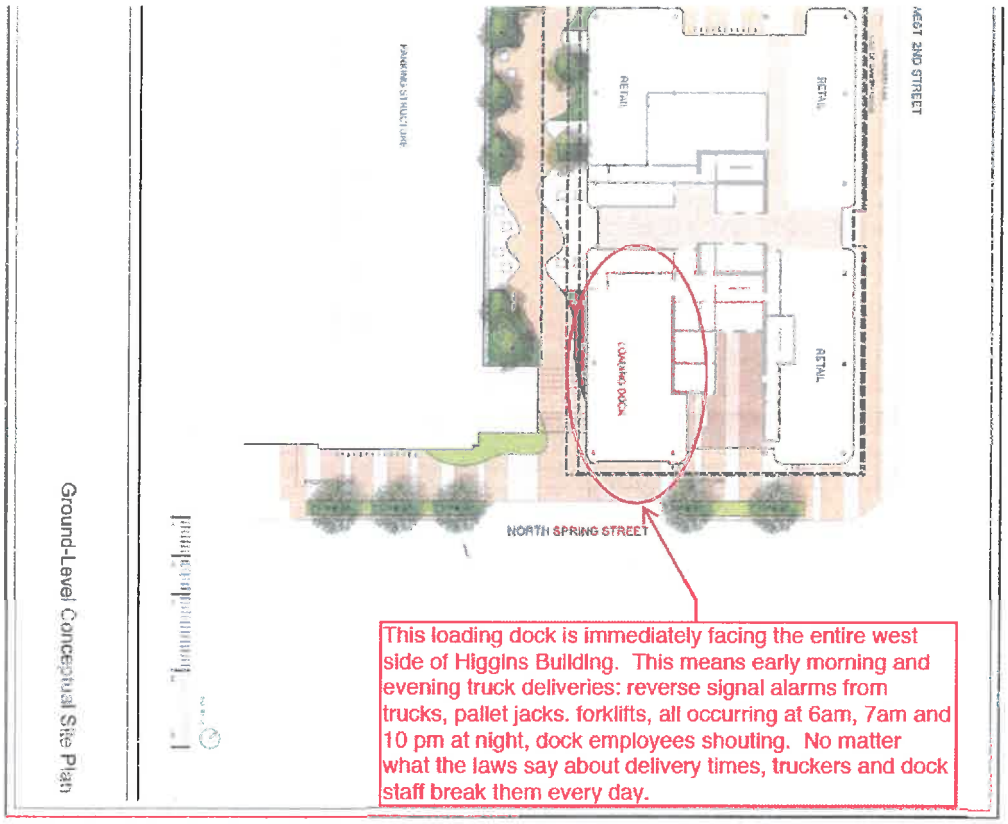
Case #: Env-2016-3809-EIR | 222 West 2nd St.

Dana Reid <danajreid@gmail.com> Fri, Feb 24, 2017 at 7:44 AM
To: Kathleen King <kathleen.king@lacity.org>

Dana Reid Addendum,

I failed to mention that your proposed Metro site plans show a loading dock for the retail spaces.

This loading dock is immediately facing the entire west side of Higgins Building. This means early morning and evening truck deliveries: reverse signal alarms from trucks, pallet jacks. forklifts, all occurring at 6am, 7am and 10 pm at night, dock employees shouting. No matter what the laws say about delivery times, truckers and dock staff break them every day.



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Kathleen King <kathleen.king@lacity.org>

ENV-2016-3809-EIR | 222 W. 2nd Street

1 message

Renee Wong <reneewwong@yahoo.com> Thu, Feb 23, 2017 at 10:42 AM
Reply-To: Renee Wong <reneewwong@yahoo.com>
To: "kathleen.king@lacity.org" <kathleen.king@lacity.org>

Hi Kathleen,

I am a concerned resident about the proposed plan to build a 30 story building at 222 W. 2nd Street. The current lot is invaluable as it supplies parking to so many residents when parking is already scarce. Also, the area is historic and gorgeous. Many (myself included) were drawn to the area because of the aesthetic and the existing vibe of the community. This modern 30 story building would disrupt the scale of the buildings in the surrounding neighborhood and be a detrimental addition to the DTLA skyline in its design. Our historic building is a small 10 story building. To tower over us is not just a denigration of our view but the views to monuments like City Hall and the Disney Hall for many other downtowners who have invested in real estate downtown. The noise and air quality will greatly affect not only the quality of life for residents, businesses and those who work nearby, but also GREATLY affect the property value and their ability to sell or rent at competitive rates in the future. Please leave the building alone as we want to keep the community happy.

I am not opposed to builds that bring value without sacrificing the integrity of the existing community, but the cons outweigh the pros on this proposal for us and I am **strongly** opposed to this build.

Thanks.
Renee

You cannot say 'the sky's the limit' when there are footsteps on the moon.

Kathleen King <kathleen.king@lacity.org>

ENV-2016-3809-EIR

1 message

Renee Wong <reneewwong@yahoo.com> Thu, Feb 23, 2017 at 4:30 PM
Reply-To: Renee Wong <reneewwong@yahoo.com>
To: "charlie.rausch@lacity.org" <charlie.rausch@lacity.org>, "kathleen.king@lacity.org" <kathleen.king@lacity.org>

I am a homeowner in the community and I OPPOSE case number ENV-2016-3809-EIR - the proposed plan to build a 30 story building at 222 W. 2nd Street. The current lot is invaluable as it supplies parking to so many residents when parking is already scarce. Also, the area is historic and gorgeous. Many are drawn to the area because of the aesthetic, the less crowded skyline, parks and the general existing environment of the community. This modern 30 story building would disrupt the scale of the buildings in the surrounding neighborhood and be a detrimental addition to the DTLA skyline in its design, causing more harmful pollution to the already potent air and sound quality of the city.

I reside in a historic buildings. To tower over my little building is not just a denigration of the view I paid for but the views to monuments like City Hall and the Disney Hall from other homeowners in buildings downtown. The compounded noise and the aggravated air quality will greatly affect not only the quality of life for residents, animals, businesses and those who work nearby, but also GREATLY affect our property value and our ability to sell or rent at a more competitive rate. Please leave the building alone as I want to keep the community happy, the views clear, and the environmental footprint less disturbed.

I am not opposed to builds that bring value without sacrificing the integrity of the existing community. Perhaps a build that scales to the existing building's height, but as is, I feel the cons far outweigh the pros on this proposal for the 30 story and are strongly opposed to this build. Please consider building to scale of the surrounding area which will eliminate unnecessary pollution, preserving as much environmental quality as possible to the community now and for generations to come.

Thank you for attending to the matter.

Renee Mytar
You cannot say 'the sky's the limit' when there are footsteps on the moon.

Kathleen King <kathleen.king@lacity.org>

RE: 222 Spring St. Project

1 message

cheryl younger/allan harris <cheryl.younger@yahoo.com> Wed, Feb 22, 2017 at 4:19 PM
Reply-To: cheryl younger/allan harris <cheryl.younger@yahoo.com>
To: "kathleen.king@lacity.org" <kathleen.king@lacity.org>

Kathleen King, Planning Assistant
City of Los Angeles Department of City Planning
220 N. Spring Street. Room 750
Los Angeles, CA 90012

Dear Ms. King,

I object to the proposed building, 222 W. 2nd Street Project because it offers **NOTHING** to the surrounding community and the City of Los Angeles.

It **TAKES** away 600 parking places.
It **TAKES** away the view from of our skyline, **DIMINISHES** our landmark buildings, and will stick up like a sore thumb.

Second Street has a possibility of being a beautiful wide street from the Disney Center and Broad Museum on down to Little Tokyo, if the 222 project is **NOT** built as proposed. The proposed Gehry Development on Grand, like the new Federal Court Building is set back and provides green space. Attention was paid in their design not to overwhelm the premiere center of our City–City Hall. This grand building built in 1928 by AC Martin still maintains it grandeur. The earlier built part of the LA Times Building is magnificent, as is the new Police Administration Building (again set back and providing green space to the area), the architectural interesting Caltrans (again set back and provides a green wall and trees to 2nd Street). The historic designated Higgins Building and St. Vibiana (again with green trees lining 2nd street). When you reach the Weller Center–the builders made a point to provide a breathtakingly magnificent view of the city hall all within a profile lower than the grand center of our city–City Hall, itself.

222 W. 2nd offers **NOTHING** but some apartments and office space.

They are asking for a variance for a taller building? This is not a high-rise area–take it to South Park. Come up with a plan that fits the lot and the area.

This building should be no taller that the apartments on Olive, that way it fits with the area and does not disrupt the skyline—it would not then stick up like a square, sore thumb.

The new building should also be moved back from Second Street and the subway station (which could provide a low-rise park like area), and reiterate the wide park-like character of 2nd Street. Build a lower rise 222 project over the parking lot area–then you would not need a variance and you have enhance the city for generations.

There are some crappy buildings and vacant lots in this area, but, there are many more fabulous buildings on Broadway–building their builders were proud to put their name on, and their money in. Higgins (with architects Haley and A.C. Martin) built the Higgins Building on 2nd Street to be the first steel reinforced concrete building on the WEST Coast. AC Martin went on build some 1500 buildings (including City Hall) contributing to the greatness of the city. The civic buildings in this area are incredible and something our city can be proud of. We need to get it right this time, because the opportunity to build on the shoulders of these great Architects, will not come again. And the crappy new buildings and sore thumbs we allow now, will stand long after their developers sell them off for cash and leave town to blight other cities in their greed.

Cordially,

Cheryl Younger
108 W. 2nd Street 1002
Los Angeles, CA 90012
212 203 9645

Cheryl Younger and Allan Harris

Cheryl's USA Cell (001) 1 (212) 203 9645 **Allan's** USA Cell (001) 1 (212) 966 4035 **Skype #** (646) 233 3270

cheryl.younger@yahoo.com

Home:

LA 108 W 2ND ST #1002
Los Angeles, CA 90012

NYC 35 Mercer Street 3A
New York, NY 10013