



DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

City Planning Commission

Date: January 27, 2022
Time: After 8:30 A.M.*
Place: In conformity with Government Code Section 54953 and due to concerns over COVID-19, the CPC meeting will be conducted entirely telephonically by Zoom [<https://zoom.us/>].

The meeting's telephone number and access code access number will be provided no later than 72 hours before the meeting on the meeting agenda published at <https://planning.lacity.org/about/commissionsboards-hearings> and/or by contacting cpc@lacity.org.

Public Hearing: Required
Appeal Status: General Plan Amendment is not appealable. Zone Change is appealable only by the applicant to the City Council if disapproved in whole or in part.
Expiration Date: January 27, 2022
Multiple Approval: No

PROJECT LOCATION: 2417-2455 North Thomas Street and 2428-2436 North Gates Street

PROPOSED PROJECT: The proposed project is a change of use from a school, daycare, convent, dormitories, playground, and chapel to storage, office and motion picture/television uses. The request includes a General Plan Amendment from Low Residential to Neighborhood Commercial and a Vesting Zone Change from [Q]R1-1D and [Q]R1-1D-HPOZ to [Q]C2-1D and [Q]C2-1D-HPOZ. As indicated below, the recommended zone change is to (T)(Q)C4-1D and (T)(Q)C4-1D-HPOZ. The proposed project also includes the potential development of an additional 10,000 square feet of office use on portions of the project site that are outside the current HPOZ boundaries. There is no demolition and no grading proposed at this time.

REQUESTED ACTIONS:

- 1) Pursuant to CEQA Guidelines Section 15074(b), Negative Declaration, Case No. ENV-2019-4984-ND ("Negative Declaration"), Errata dated January 18, 2022, the whole of the administrative record, and all comments received;
- 2) Pursuant to Los Angeles City Charter 555 and Los Angeles Municipal Code (LAMC) Section 11.5.6, a General Plan Amendment to the Northeast Los Angeles Community Plan to amend the Land Use designation from Low Residential to Neighborhood Commercial; and

Case No.: CPC-2019-4983-GPA-VZC
CEQA No.: ENV-2019-4984-ND
Related Cases: N/A
Council No.: 1 - Cedillo
Plan Area: Northeast Los Angeles
Specific Plan/Overlay: Northeast Los Angeles Hillside Ordinance
Certified NC: Lincoln Heights
Existing GPLU: Low Residential
Proposed GPLU: Neighborhood Commercial
Existing Zone: [Q]R1-1D / [Q]R1-1D-HPOZ
Proposed Zone: (T)(Q)C4-1D and (T)(Q)C4-1D-HPOZ
Applicant: Josh Oreck
Narrator, Inc.
Representative: Paul Garry
PSOMAS

- 3) Pursuant to LAMC Section 12.32 F and Q, a Vesting Zone Change to change the zone designation from [Q]R1-1D and [Q]R1-1D-HPOZ to [Q]C2-1D and [Q]C2-1D-HPOZ.

RECOMMENDED ACTIONS:

- 1) **Find**, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Negative Declaration, No. ENV-2019-4984-ND (“Negative Declaration”), Errata dated January 18, 2022, and all comments received, there is no substantial evidence that the project will have a significant effect on the environment; **FIND** the Negative Declaration reflects the independent judgment and analysis of the City; and **ADOPT** the Negative Declaration;
- 2) **Approve** and **Recommend** the City Council Approve a **General Plan Amendment** to the Northeast Los Angeles Community Plan for the project site from Low Residential to Neighborhood Commercial land use designation;
- 3) **Approve** and **Recommend** that the City Council adopt a **Vesting Zone Change** on the project site from [Q]R1-1D and [Q]R1-1D-HPOZ to (T)(Q)C4-1D and (T)(Q)C4-1D-HPOZ;
- 4) **Adopt** the attached Findings;
- 5) **Advise** the applicant that pursuant to State Fish and Wildlife Code Section 711.4, a Fish and Wildlife fee is now required to be submitted to the County Clerk prior to or concurrent with the Environmental Notice of Determination (NOD) filing.

VINCENT P. BERTONI, AICP
Director of Planning

Jane Choi

Jane Choi, AICP
Principal City Planner

Debbie Lawrence

Debbie Lawrence, AICP
Senior City Planner

Nicole Sanchez

Nicole Sánchez
City Planner

ADVICE TO PUBLIC: *The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Requirements for submission of materials can be found on the Department of City Planning website at <https://planning.lacity.org/about/virtual-commission-instructions>. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to these programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request not later than 72 working hours prior to the meeting by calling the Commission Secretariat at (213) 978-1295.

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PROJECT ANALYSIS

Project Summary

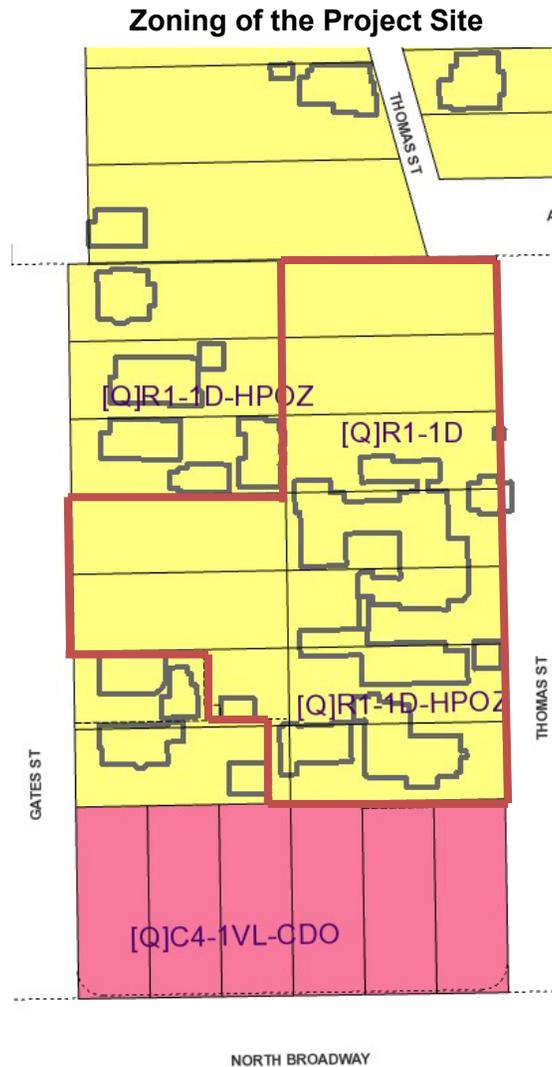
The project site is located within the Northeast Los Angeles Community Plan, within the Northeast Hillside Ordinance area, and partially within the Lincoln Heights Historic Preservation Overlay Zone (HPOZ). The proposed project is a change of use from a school, daycare, convent, dormitories, playground, and chapel to storage, office and motion picture/television uses. The request by the applicant includes a General Plan Amendment from Low Residential to Neighborhood Commercial and a Vesting Zone Change from [Q]R1-1D and [Q]R1-1D-HPOZ to [Q]C2-1D and [Q]C2-1D-HPOZ. The proposed project also includes the potential development of an additional 10,000 square feet of office and motion picture/television uses on portions of the project site that are outside the current HPOZ boundaries. There is no demolition and no grading proposed at this time.

Aerial View of the Project Site



Project Site

The site encompasses 11 lots, of which six (6) are located within the Lincoln Heights Historic Preservation Overlay Zone (HPOZ). The subject site has a street frontage along Thomas Street that measures approximately 420 feet; frontage along a portion of Altura Street that measures approximately 54 feet; and frontage along Gates Street that measures approximately 120 feet.



The project site is an irregular shape with a total site size of 93,340 square feet (2.14 acres). It is currently improved with a school, daycare, convent, dormitories, playground, chapel, and surface parking area. Existing structures were built in 1941, 1947 and 1954. All existing structures are currently vacant and unoccupied.

Previous Use Summary

Building	Size (refer to Architectural Plans)	Previous Use
A	8,928 sf	Chapel, Kitchen/Dining, Offices, Lounge, Convent
B	1,422 sf	Kindergarten
C	678 sf	Kindergarten
D	2,970 sf	Pre-K
E	1,794 sf	Nursery (infants/toddlers)
F	1,154 sf	Storage
G	372 sf	Storage

The campus in its entirety was identified in the Lincoln Heights Historic Resources Survey as a Contributing Element. However, only a portion of the site was included within the Lincoln Heights HPOZ boundaries. The structures on the campus are proposed to be preserved and maintained to allow for their adaptive reuse as office space.

Streets and Circulation

The subject site is located north of North Broadway in the eastern edge of the Lincoln Heights area of the Northeast Community Plan. It is located generally between Gates Street and Thomas Street. The project site is located 2.5 miles northeast of Downtown Los Angeles, approximately 0.75 miles east of the Golden State (I-5) Freeway and 1.25 miles north of the San Bernardino (I-10) Freeway. The project site is also located approximately 0.95 miles away from the Lincoln/Cypress Station of the Metro Gold Line. The subject site has three street frontages: Thomas Street, Altura Street, and Gates Street.

Thomas Street, a designated Local Street – Standard with a designated right-of-way width of 60 feet and designated roadway width of 36 feet.

Altura Street, a designated Local Street – Standard with a designated right-of-way width of 60 feet and designated roadway width of 36 feet.

Gates Street, a designated Local Street – Standard with a designated right-of-way width of 60 feet and designated roadway width of 36 feet.

Surrounding Properties

The subject site is surrounded on the north, east, and west by a mix of one- to two-story single and multi-family dwellings. There is an adjacent commercial strip mall located south of the project site. To the east is the Lincoln Senior High School and Pueblo High School. To the south is also the Gates Street Elementary School. The North Broadway corridor is designated for, and consists of neighborhood commercial uses, and serves as the connector to Downtown Los Angeles. Properties to the north are zoned [Q]R1-1D. Properties to the east are zoned [Q] R1-1D, [Q]OS-1XLD, and [Q]PF-1D. Properties to the south are zoned [Q]C4-1VL-CDO and properties to the west are zoned [Q]RD3-1D-HPOZ.

Considerations**General Plan Land Use Designation and Zoning**

The project site is located within the Northeast Los Angeles Community Plan and is currently designated for Low Residential land uses, with corresponding zones of RE9, RS, R1, RU, RD6,

and RD5. The Northeast Los Angeles Community Plan text identifies the site as being within the Lincoln Heights neighborhood, which is described in the text as containing the oldest traces of urban development in Northeast Los Angeles, dating from the 1870's.

The project application was submitted to the Department of City Planning on August 21, 2019 and includes a request for a General Plan Amendment and Vesting Zone Change which would result in allowing commercial and office uses where not previously allowed. The project application includes a request to amend the land use designation of the project site from Low Residential to Neighborhood Commercial. The amendment was initiated by the Director of City Planning on July 30, 2019. In conjunction with the requested amendment, the application includes a request for a Vesting Zone Change from [Q]R1-1D and [Q]R1-1D-HPOZ to [Q]C2-1D and [Q]C2-1D-HPOZ.

The request would allow the adaptive reuse of the existing structures previously used for a school, daycare, convent, dormitories, playground, chapel, and surface parking area into storage, office and motion picture/television uses. The applicant also requests up to 10,000 square feet of office and motion picture/television uses for potential future development. The potential future development will be located on three (3) of the lots that are currently located outside the boundaries of the HPOZ. The potential future development would be located towards the rear of the site and would be required to comply with the height and floor area requirements that also apply to the surrounding area.

As the site is zoned R1, storage, office and motion picture/television uses are currently not allowed without the requested amendment and zone change. While the previous uses at the site were also not residential, the existing structures were built and the former uses established prior to the last Community Plan and General Plan update. The re-zoning of the site for office uses would allow an appropriate adaptive reuse of a site which currently contains vacant structures that were used previously for a school, daycare, convent, dormitories, playground, chapel, and surface parking area.

Although the proposed use would be located within an area that is currently designated and zoned for Low Residential uses, the proposed use would be consistent and compatible with the existing development of the site and surrounding area. The proposed project would maintain the existing height district to further maintain consistent development scale with the surrounding residential and commercial properties.

Recommended Zoning

The Applicant requested a zone change to the [Q]C2-1D and [Q]C2-1D-HPOZ zones. Planning Staff recommends the proposed zones of (T)(Q)C4-1D and (T)(Q)C4-1D-HPOZ. The C4 Zone is being proposed in lieu of the C2 zone for consistency with the C4 zoned properties to the south of the subject site. Therefore, the proposed project would support a gradual transition and buffer in scale and character between the new commercial strip mall development and the surrounding historic residential uses on the north, east and west sides of the subject site. The (T) Conditions will ensure that dedications and public improvements, such as new curb and gutters along Gates Street where access is proposed to be taken most frequently, are provided, and compliance with ADA requirements are met. The (Q) Conditions will ensure that the site plan reflecting the existing buildings onsite will be maintained and that the allowed use be limited to only storage, office and motion picture/television uses. The (Q) Conditions will also ensure that the existing and contributing structures will not be altered so that they continue to contribute to the historic character of the surrounding community and the HPOZ. The D Limitations will carry over the height limit consistent with the Northeast Los Angeles Hillside Ordinance and limit the floor area to what is existing plus the potential for up to an additional 10,000 square feet of development.

Measure JJJ

On November 8, 2016, voters in the City of Los Angeles approved and passed Measure JJJ, the “Build Better LA Initiative”. Among other provisions, the ballot initiative imposed minimum affordable housing requirements and labor regulations on any development project that results in 10 or more residential dwelling units, and requires a General Plan Amendment, Zone Change, and/or Height District Change that results in increased allowable residential floor area, density, height, or allows a residential use where previously not allowed. Measure JJJ became effective on December 13, 2016, following the Council’s action to certify the election results. Additionally, pursuant to LAMC Section 11.5.11, developers seeking density incentives are no longer eligible for Zone Change, Height District Change or General Plan Amendments as part of their entitlement requests.

While the project involves a General Plan Amendment and a Vesting Zone Change, the project does not propose any residential uses. Therefore, the proposed project is not subject to Measure JJJ because it will not result in 10 or more residential dwelling units.

The requested zone would typically allow for residential uses on the subject site. However, the project solely proposes a change of use to storage, office and motion picture/television uses with no change to the existing structures. Furthermore, the Department of City Planning recommendation herewith includes a “Q” Qualified Condition (Page Q-1) that will prohibit any other use than what is currently being proposed through the subject change of use request. If housing is proposed on the site in the future, the site will need to go through a zone change process to allow for that use. The applicability of Measure JJJ would be freshly evaluated at the time such a request is made at a future date.

Project Design

The proposed project is a change of use from a school, daycare, convent, dormitories, playground, and chapel to storage, office and motion picture/television uses. The proposed project also includes the potential development of an additional 10,000 square feet of office and motion picture/television uses on portions of the project site that are outside the current HPOZ boundaries. There is no demolition and no grading proposed at this time.

Six of the 11 lots that compose the project site are included within the boundaries of the Lincoln Heights HPOZ. According to the Lincoln Heights Historic Resources Survey, “Contributing Structures” to the HPOZ are located on several lots, both inside and outside the current HPOZ boundary. These structures are categorized as being in the Lincoln Heights Early Modern (1900-1945) and Post World War II styles (1945-1965). In line with these periods of significance, the existing structures contain elements of Art Deco/Moderne style buildings and post-war masonry institutional buildings with long horizontal building lines and minimalistic design elements.

Minor improvements to the existing structures that are proposed to remain may be necessary to comply with current LAMC regulations as part of the change of use process. Any such improvements will be required to be in compliance with the applicable requirements of the HPOZ for those buildings within the HPOZ boundaries.

Open Space and Landscaping

The requested change of use does not require Open Space as part of the project. However, the proposed project includes maintaining the approximately 36,400 square feet of open space that exists on-site. This open space is composed of an outdoor terraced amphitheater, walkways, and a covered trellis area. The existing trees will be maintained. These areas will soften the visual

appearance of the site and the existing buildings, allowing it to be compatible with the character of the surrounding residential and commercial uses.

In order for the potential future development of 10,000 square feet to be built, the existing open space and landscaping areas will decrease. The proposal calls for this future development to be located where the existing open space is currently located. Therefore, there is potential that the existing open space and landscaping will decrease from 36,400 to about 29,745 square feet with the development of the additional floor area.

Access, Circulation, and Parking

The subject site has three street frontages: Thomas Street, Altura Street, and Gates Street. Access to on-site parking is provided through two (2) existing driveways, one on Gates Street and the other on Thomas Street. The Gates Street entrance on the west edge of the property serves as the primary entrance to the site. The second driveway is solely for emergency access and is not an entrance to the site.

There are 39 automobile parking spaces existing on-site. Based on the size of the proposed office use, a minimum of 35 automobile parking spaces are required for the project. By incorporating the Bicycle Parking Ordinance reductions available (LAMC Section 12.21 A.4), the required automobile parking requirement is reduced to 34 spaces. The project proposes 39 parking spaces on four (4) separate surface parking areas. No significant changes on-site are required in order to accommodate the parking spaces. The proposed project is providing five (5) bicycle parking spaces.

The potential additional floor area will require the provision of 16 automobile parking spaces and three (3) bicycle parking spaces (1 short term and 2 long-term).

Public Hearing

A public hearing was conducted by the Hearing Officer on behalf of the City Planning Commission on September 24, 2020. The Public Hearing on this matter was held telephonically via Zoom. The hearing was attended by a few community members, a representative of the Lincoln Heights Neighborhood Council, and a Council District 1 Representative. The applicant's representative gave a brief project and entitlement description and then the public comment period was opened. The Neighborhood Council Representative spoke in support of the request as did one community member. The Council District 1 Representative also spoke in support of the project stating it would be a welcome addition of community benefits and asked the Department of City Planning to consider doing further analysis into the Lincoln Heights HPOZ Survey. They also indicated a formal letter of support for the project would be forthcoming.

After the initial public hearing on September 24, 2020, the applicant changed the project description to include the potential for 10,000 square feet of additional floor area for office use. A public hearing is required at the CPC meeting to take testimony regarding the new project description.

Relevant Cases

Subject Property:

Ordinance No. 180,403 (Case No. CPC-2008-1182-ZC): On November 26, 2008, the City Council approved Zone Changes establishing [Q] Conditions and [D] Limitations related to hillside development.

Case No. CPC-2006-10393-MSC: On August 21, 2007, the City Planning Commission approved the Lincoln Heights Preservation Plan for the adopted Historic Preservation Overlay Zone (HPOZ).

Case No. CPC-2003-5342-HPOZ: On June 18, 2004, the City Planning Commission approved the Lincoln Heights HPOZ.

Case No. CPC-1986-826-GPC: The City Planning Commission approved various zone changes to existing Northeast Los Angeles zones.

Ordinance No. 129,279: On January 12, 1965, the City Council approved an Ordinance amending the definition of "Hillside Areas" of Subsection (h) of Section 91.0403 of the Los Angeles Municipal Code (LAMC).

Surrounding Properties:

There are no relevant cases on the surrounding properties.

Issues

Preservation of the Site

Portions of the project site are located outside of the Lincoln Heights HPOZ. This includes five (5) parcels, located at 2429, 2435, 2439, 2445 and 2455 N. Thomas Street. These parcels were surveyed during the HPOZ adoption process and identified, along with six (6) other parcels located within the district, as a Contributing Element, but were inadvertently left outside the final HPOZ boundaries. Taken together, these 11 parcels were home to a campus, which included a convent, chapel, school, and daycare, operated by the Carmelite Sisters. The campus in its entirety was identified as a Contributing Element to the Lincoln Heights HPOZ. All 11 lots are identified as having Contributing Elements to the HPOZ according to the Lincoln Heights Historic Resources Survey. However, only a portion of the site was included as part of the HPOZ boundaries. While only portions of the site are within the HPOZ boundaries today, the intent of the project is to maintain and preserve the buildings as they currently exist. These structures on the campus are proposed to be preserved and maintained to allow for their adaptive reuse as office space. The existing structures will not be altered, so that they can continue to contribute to the historic character of the surrounding community and the HPOZ. In order to achieve this goal, the project has been conditioned to maintain the existing structures and only allow for minor improvements in order to comply with current LAMC regulations as part of the change of use process. Any such improvements will be required to be in compliance with the applicable requirements of the HPOZ for those buildings within the HPOZ boundaries. Those lots that currently include an HPOZ designation in their zoning will retain that designation if the recommended zones are approved.

The applicant also requests up to 10,000 square feet of office and motion picture/television uses for a potential future development. The additional floor area will be in seven (7) one-and two-story buildings located in the northeast portion of the project site that is currently a landscaped garden area. This area is not within the boundary of the HPOZ and will not require HPOZ approval.

Northeast Hillside Ordinance (Northeast "Q's" and "D's")

The project site is currently within the boundary and subject to the [Q] Qualified Conditions and "D" Development Limitations of the Northeast Los Angeles Hillside Zone Change Ordinance (Ordinance No. 180,403). This Ordinance established regulations for properties in the adopted

Hillside area and regulates properties in the following zones: OS, A1, RE40, RE20, RE9, RS, R1, R2, RD6, RD5, RD4, RD3, RD2, RD1.5, C1, and PF. The regulations focus on size, height, retaining walls and grading limitations. While the subject site would currently be subject to these regulations because it is zoned [Q]R1-1D and [Q]R1-1D-HPOZ, changing the zone to the recommended C4 zone would not subject the site to this Ordinance because the ordinance does not have regulations for C4 zoned properties. In order to ensure that the best interests of the public are furthered, and the character of the hillside and neighborhood does not change with the introduction of the new use, the “D” limitation (Page D-1 below) has been recommended to limit height to a maximum of 30 feet and the floor area to what is currently on site, plus a potential future addition of 10,000 square feet. These limitations align with the regulations within the Northeast Hillside Ordinance and will ensure that while the Northeast Hillside Ordinance would no longer apply given the new zone on the site, the character of the development will remain unchanged, securing an appropriate development in harmony with the objectives of the General Plan.

Conclusion

Based on the information submitted to the record, staff recommends that the City Planning Commission recommend approval of the General Plan Amendment from Low Residential to Neighborhood Commercial and approval of the Vesting Zone Change from [Q]R1-1D and [Q]R1-1D-HPOZ to (T)(Q)C4-1D and (T)(Q)C4-1D-HPOZ. Staff also recommends that the City Planning Commission find that the project was assessed in Negative Declaration, No. ENV-2019-4984-ND, and Errata dated January 18, 2022; and pursuant to CEQA Guidelines Sections 15162 and 15164, no subsequent EIR, Negative Declaration, or Addendum is required for approval of the project. As proposed, the project site will be redeveloped with a new storage, office and motion picture/television development consisting of the existing 17,318 square feet plus an additional 10,000 square feet of office and motion picture/television uses.

CONDITIONS FOR EFFECTUATING (T) TENTATIVE CLASSIFICATION REMOVAL

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

1. Dedications and Improvements. Prior to the issuance of any building permits, public improvements and dedications for streets and other rights-of-way adjoining the subject property shall be guaranteed to the satisfaction of the Bureau of Engineering, Department of Transportation, Fire Department (and other responsible City, regional, and Federal government agencies as may be necessary).

A. Responsibilities/Guarantees.

1. As part of early consultation, plan review, and/or project permit review, the applicant/developer shall contact the responsible agencies to ensure that any necessary dedications and improvements are specifically acknowledged by the applicant/developer.
2. Prior to the issuance of sign-offs for final site plan approval and/or project permits by the Department of City Planning, the applicant/developer shall provide written verification to the Department of City Planning from the responsible agency acknowledging the agency's consultation with the applicant/developer. The required dedications and improvements may necessitate redesign of the project. Any changes to the project design required by a public agency shall be documented in writing and submitted for review by the Department of City Planning.

B. Dedication Required –

Thomas Street (Hillside Local Street) – A 10-foot by 10-foot cut corner or a 15-foot radius property line return at the intersection with Altura Street.

Altura Street (Hillside Local Street) – None.

Gates Street (Hillside Local Street) – None.

C. Improvement Required –

Gates Street – Construct new integral concrete curb and gutter along the property frontage. Repair and or replace all broken, off-grade or bad order concrete sidewalk and roadway pavement. Close all unused driveways and reconstruct all open driveways to comply with ADA requirements.

Note: Broken curb and/or gutter includes segments within existing score lines that are depressed or upraised by more than $\frac{1}{4}$ inch from the surrounding concrete work or are separated from the main body of the concrete piece by a crack through the entire vertical segment and greater than $\frac{1}{8}$ inch at the surface of the section.

Non- ADA compliant sidewalk shall include any sidewalk that has a cross slope that exceeds 2% and/or is depressed or upraised by more than $\frac{1}{4}$ inch from the

surrounding concrete work or has full concrete depth cracks that have separations greater than 1/8 inch at the surface. The sidewalk also includes that portion of the pedestrian path of travel across a driveway.

All new sidewalk curb and gutter shall conform to the Bureau of Engineering Standard Plans S410-2, S410-4, S442-5 and S444-0.

Install tree wells with root barriers and plant street trees satisfactory to the City Engineer and the Urban Forestry Division of the Bureau of Street Services. The applicant should contact the Urban Forestry Division for further information (213) 847-3077.

Notes: Street lighting will be required satisfactory to the Bureau of Street Lighting (213) 847-1551.

Department of Transportation may have additional requirements for dedication and improvements.

Refer to the Department of Water and Power regarding power pole (213) 367-2715.

Refer to the Fire Department regarding fire hydrants (213) 482-6543.

Contact the Department of Transportation regarding any conflicts with parking spaces, meters, traffic signs, colored curbs, or traffic control devices (213) 482-7024.

2. Roof drainage and surface run-off from the property shall be collected and treated at the site and drained to the streets through drain pipes constructed under the sidewalk or through curb drains connected to the catch basins.
3. Sewer lines exist in Thomas Street and Gates Street. Extension of the 6-inch house connection laterals to the new property line may be required. All Sewer Facilities Charges and Bonded Sewer Fees are to be paid prior to obtaining a building permit at (213) 482-7030.
4. An investigation by the Bureau of Engineering Central District Office Sewer Counter may be necessary to determine the capacity of the existing public sewers to accommodate the proposed development. Submit a request to the Central District Office of the Bureau of Engineering at (213) 482-7030.
5. Submit parking area and driveway plans to the Central District Office of the Bureau of Engineering and the Department of Transportation for review and approval.

Notice: If conditions dictate, connections to the public sewer system may be postponed until adequate capacity is available.

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

(Q) QUALIFIED CONDITION

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

1. **Site Development.** Site Plan. The use and development of the subject property shall be in substantial conformance with the site plan labeled Exhibit "A". Prior to the issuance of building permits, detailed development plans including a site plan illustrating elevations, facades, and architectural treatment, and a landscape/irrigation plan shall be submitted for review and approval by the Central Project Planning Division of the Department of City Planning. The plans shall comply with provisions of the Municipal Code, the subject conditions, and the intent of the subject permit authorization. No change to the plans shall be made without prior review by the Department of City Planning Central Project Planning Division, and written approval by the Director of Planning, with each change being identified and justified in writing. Minor deviations may be allowed in order to comply with provisions of the Municipal Code, the subject conditions, and the intent of the subject permit authorization.
2. **Use.** The subject site shall only contain storage, office and motion picture/television uses as allowed in the C4 Zone and shown in Exhibit A; or the site may be developed with residential uses allowed and in accordance with the density and all other development standards of the [Q]R1-1D zone (Ordinance No. 180,403).
 - a. The subject site shall only contain storage, office and motion picture/television uses as allowed in the C4 Zone.
 - b. A maximum of 15,792 square feet of office and motion picture/television uses and 1,526 square feet of storage use, for a total of 17,318 square feet shall be permitted.
 - c. A maximum additional 10,000 square feet of office and motion picture/television uses shall be permitted.
3. **Automobile Parking.** Automobile parking for the office use shall be provided consistent with LAMC Section 12.21 A.4. Based upon the size of the proposed office use, a minimum of 35 automobile parking spaces shall be required for project. Based upon the size of the additional future office use, 10 automobile parking spaces shall be required for the additional development.
4. **Bicycle Parking.** Bicycle parking for the additional 10,000 square feet of office use shall be provided consistent with LAMC Section 12.21 A.16. Based upon the size of the addition office development, a minimum of 53 bicycle parking spaces shall be required for the project.
5. **Electric Vehicle Parking.** All electric vehicle charging spaces (EV spaces) and electric vehicle charging stations (EVCS) shall comply with the regulations outlined in Sections 99.04.106 and 99.05.106 of Article 9, Chapter IX of the LAMC. Any parking spaces provided above LAMC requirements shall be provided with EV chargers to immediately accommodate electric vehicles within the parking areas.
6. **Solar.**
 - a. Solar and Electric Generator. Generators used during the construction process shall be electric or solar powered. Solar generator and electric generator equipment shall be located as far away from sensitive uses as feasible.

- b. **Solar-ready Buildings.** The project shall comply with the Los Angeles Municipal Green Building Code, Section 99.05.211, to the satisfaction of the Department of Building and Safety.

Administrative Conditions

7. **Approvals, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, reviews or approval, plans, etc, as may be required by the subject conditions, shall be provided to the Department of City Planning for placement in the subject file.
8. **Code Compliance.** All area, height and use regulations of the zone classification of the subject property shall be complied with, except wherein these conditions explicitly allow otherwise.
9. **Covenant.** Prior to the issuance of any permits relative to this matter, an agreement concerning all the information contained in these conditions shall be recorded in the County Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assign. The agreement must be submitted to the Department of City Planning for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Department of City Planning for attachment to the file.
10. **Definition.** Any agencies, public officials or legislation referenced in these conditions shall mean those agencies, public offices, legislation or their successors, designees or amendment to any legislation.
11. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning and any designated agency, or the agency's successor and in accordance with any stated laws or regulations, or any amendments thereto.
12. **Building Plans.** A copy of the first page of this grant and all Conditions and/or any subsequent appeal of this grant and its resultant Conditions and/or letters of clarification shall be printed on the building plans submitted to the Development Services Center and the Department of Building and Safety for purposes of having a building permit issued.
13. **Corrective Conditions.** The authorized use shall be conducted at all times with due regard for the character of the surrounding district, and the right is reserved to the City Planning Commission, or the Director pursuant to Section 12.27.1 of the Municipal Code, to impose additional corrective conditions, if, in the Commission's or Director's opinion, such conditions are proven necessary for the protection of persons in the neighborhood or occupants of adjacent property.
14. **INDEMNIFICATION AND REIMBURSEMENT OF LITIGATION COSTS.**

Applicant shall do all of the following:

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

- b. Reimburse the City for any and all costs incurred in defense of an action related to or arising out of the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.
- c. Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than \$50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
- d. Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
- e. If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

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

For purposes of this condition, the following definitions apply:

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

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

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

“D” DEVELOPMENT LIMITATIONS

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

1. **Floor Area.** The existing floor area shall be maintained and shall consist of a maximum of 15,792 square feet of office and motion picture/television uses and 1,526 square feet of storage use, for a total of 17,318 square feet, as conditioned.
 - a. The development of future office and motion picture/television uses shall be limited to an additional 10,000 square feet, as shown in Exhibit A.

2. **Height.** The height of the existing structures shall be maintained and shall not exceed a height of 30-feet.
 - a. The height of future office and motion picture/television buildings shall be limited to a maximum of 30-feet, as shown in Exhibit A.

FINDINGS

General Plan/Charter Findings

1. **General Plan Land Use Designation.** The project site, located at 2417-2455 N Thomas Street and 2428-2436 N Gates Street, is within the Northeast Los Angeles Community Plan, which was last updated by the City Council in 1999. The project site is an irregular shape, consisting of 11 lots with a total site size of 93,340 square feet. The Community Plan designates the site with a land use designation of Low Residential, which lists the RE9, RS, R1, RU, RD6, and RD5 Zones as corresponding zones. This designation and zone would not currently allow commercial uses.

As recommended, the subject amendment would re-designate the project site to the Neighborhood Commercial land use designation, which lists the following corresponding zones: C1, C1.5, C2, C4, and P. The recommended change to the zone (T)(Q)C4-1D and (T)(Q)C4-1D-HPOZ would be consistent with the adoption of the recommended Plan Amendment, would be in substantial conformance with the purpose, intent, and provisions of the General Plan as it is reflected within the Northeast Los Angeles Community Plan, and would be consistent with the C4 zoning of the surrounding properties along North Broadway.

2. **Charter Finding – City Charter Finding 555.** The General Plan may be amended in its entirety, by subject elements or parts of subject elements, or by geographic areas, provided that the part or area involved has significant social, economic, or physical identity.

The project site is located within the Northeast Los Angeles Community Plan area, north of North Broadway in the Lincoln Heights neighborhood, which is a commercial corridor. It is currently improved with a school, daycare, convent, dormitories, playground, chapel, and surface parking area. All existing structures are currently vacant and unoccupied. Of the total 11 lots that the project site comprises, six (6) of them are within the Lincoln Heights HPOZ, and all 11 are identified as having Contributing Elements to the HPOZ according to the Lincoln Heights Historic Resources Survey. Contributing structures on the property are proposed to be preserved and maintained to allow for their adaptive reuse as storage, office and motion picture/television space. Despite having been designated and zoned for low residential uses, the site has been occupied by these structures since 1941, prior to the enactment of the current General Plan Land Use Element.

The project proposes a change of use from a school, daycare, convent, dormitories, playground, and chapel to storage, office and motion picture/television uses. All existing structures will be adapted to either an office use or an ancillary storage use. Minor improvements to the existing structures that are proposed to remain may be necessary to comply with current codes as part of the change of use process. Any such improvements will be required to be in compliance with the applicable requirements of the HPOZ for those buildings within the HPOZ boundaries. The applicant also requests up to 10,000 square feet of office and motion picture/television uses for a potential future development that will be located on three (3) lots that are currently located outside the boundaries of the HPOZ.

As the site has historically been occupied by institutional uses, the recommended amendment to the Neighborhood Commercial designation would permit a mix of uses that is compatible with the proposed change of use and other similar uses in the vicinity and along this commercial corridor in the Lincoln Heights neighborhood. The subject site is surrounded on the north, east, and west by a mix of one- to two-story single and multi-family dwellings. There is an adjacent commercial strip mall located south of the project site. To

the east is the Lincoln Senior High School and Pueblo High School. To the south is also the Gates Street Elementary School. The North Broadway corridor is designated for, and consists of neighborhood commercial uses, and serves as the connector to Downtown Los Angeles. Properties to the north are zoned [Q]R1-1D. Properties to the east are zoned [Q]R1-1D, [Q]OS-1XLD, and [Q]PF-1D. Properties to the south are zoned [Q]C4-1VL-CDO and properties to the west are zoned [Q]RD3-1D-HPOZ.

The site is part of a geographic area that has a significant physical identity in Lincoln Heights. As previously mentioned, the project site is located within the Lincoln Heights neighborhood of the Northeast Los Angeles Community Plan. The Community Plan describes the Lincoln Heights and Montecito Heights neighborhoods as containing the oldest traces of urban development in Northeast Los Angeles, dating from the 1870's. It also describes the North Broadway commercial corridor as a challenging opportunity for revitalization efforts due to high vacancy rates and rapid turnover.

Additionally, the campus in its entirety was identified as a Contributing Element to the Lincoln Heights HPOZ, limiting demolition and physical changes to the existing buildings. The existing and contributing structures will not be altered so that they continue to contribute to the historic character of the surrounding community and the HPOZ.

Therefore, the requested amendment would permit the desired change to storage, office and motion picture/television uses while maintaining the existing height district limitations and making the development consistent with the surrounding neighborhood. The site has been part of the community for decades, and the change in the land use would allow for the preservation of the physical characteristics of the property that contribute to the identity of Lincoln Heights, with a new use that will sustain the preservation of the buildings onsite.

3. Charter Finding – City Charter Finding 556. The proposed Amendment is in substantial conformance with the purposes, intent, and provisions of the General Plan.

The project site is located within the Northeast Los Angeles Community Plan area, which is one of 35 community plans that the Land Use Element of the General Plan is comprised of. The Community Plan designates the site with a land use designation of Low Residential, which lists the following corresponding zones: RE9, RS, R1, RU, RD6, and RD5. The site is presently zoned [Q]R1-1D and [Q]R1-1D-HPOZ, which is consistent with the existing land use designation.

As recommended, the amendment would re-designate the project site from Low Residential to Neighborhood Commercial, connecting the land use on the site to the Neighborhood Commercial uses to the south of the property. The amendment of the land use designation, in conjunction with the recommended zone change to (T)(Q)C4-1D and (T)(Q)C4-1D-HPOZ, would allow the adaptive reuse and change of use of the site to storage, office and motion picture/television uses. The site is located on a site designated and zoned for low residential land uses but has continually been utilized for institutional uses. The ability to adaptively reuse the subject site without the recommended amendment and zone change is not possible as commercial uses are not permitted by-right in the existing land use designation and zone. Additionally, the subject site has been identified as containing contributing structures to the Lincoln Heights HPOZ according to the Lincoln Heights Historic Resources Survey, which potentially limits demolition and physical changes to the existing structures within the HPOZ. As further discussed in Finding Nos. 5-9 below, the amendment of the land use designation would be consistent with the purpose, intent, and provisions of the General Plan.

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

The recommended amendment to the Northeast Los Angeles Community Plan would re-designate the land use designation of the project site from Low Residential to Neighborhood Commercial. In conjunction with the recommended amendment, the recommended zone change from [Q]R1-1D and [Q]R1-1D-HPOZ to (T)(Q)C4-1D and (T)(Q)C4-1D-HPOZ would permit the requested change of use and adaptive reuse of historic structures.

Public Necessity, Convenience, and General Welfare

As recommended, the amendment would re-designate the project site from Low Residential to Neighborhood Commercial. The amendment of the land use designation, in conjunction with the recommended zone change to (T)(Q)C4-1D and (T)(Q)C4-1D-HPOZ, would allow the adaptive reuse, change of use of the site to storage, office and motion picture/television uses, and future addition of office space. The site is located on a site designated and zoned for Low Residential land uses but has continually been utilized for institutional uses. The ability to adaptively reuse the subject site without the recommended amendment and zone change is not possible as commercial uses are not permitted by-right in the existing land use designation and zone. Additionally, the subject site has been identified as containing contributing structures to the Lincoln Heights HPOZ according to the Lincoln Heights Historic Resources Survey, which potentially limits demolition and physical changes to the existing structures within the HPOZ.

By adaptively re-using the existing vacant structures and planning for additional office space, the proposed project is creating employment opportunities, accommodating a diverse professional/business entity not currently found in the surrounding community, and contributing to a major commercial corridor in the Lincoln Heights neighborhood. The proposed change of use will locate new commercial/office uses within walking distance to single and multi-family neighborhoods as well as multiple schools and institutions. The subject site is also within walking distance of nearby public transit lines which will allow the project to serve a greater public necessity.

Good Zoning Practice

The project site is designated by the Community Plan for Low Residential land uses and is zoned [Q]R1-1D and [Q]R1-1D-HPOZ. As currently zoned, it is consistent with the existing land use designation. However, the existing structures and previous uses utilized at the site do not conform to what the current designation and zone allow by-right. Additionally, the designation of some of the existing structures as part of the Lincoln Heights HPOZ, potentially limits how much the existing structures on the site can physically change. The recommended designation and zone would be compatible with both surrounding commercial designations as well as with the existing structures and previous uses. Due to the proposed project being limited to a change of use with no demolition or exterior construction, the proposed project will create a reasonable transition between the neighboring residences and commercial corridor along North Broadway. The potential future development would be located towards the rear of the site and would be required to comply with the height and floor area requirements that also apply to the surrounding area. Therefore, even the additional floor area will be compatible with surrounding commercial designations.

Introducing new office and motion picture/television uses within existing buildings in an area well served by local transit, complies with current laws and regulations that require project to contribute to reducing greenhouse gas emissions through integrated land use and

transportation planning. The proposed project promotes the use of infill and adaptive reuse opportunities which is among the top strategies to reduce such emissions.

5. **General Plan Text.** The Northeast Los Angeles Community Plan text includes the following relevant objectives, policies, and programs:

Objective 1-4: To preserve and enhance neighborhoods with a distinctive and significant historical or architectural character.

Policy 1-4.2: Protect and encourage reuse of historic resources in a manner that maintains and enhances the historic appearance of structures and neighborhoods.

Program: The Plan encourages adaptive reuse of historic buildings when the proposed uses are found to be compatible with existing residential uses.

Objective 2-2: To enhance the identity and appearance of commercial districts.

Policy 2-2.2: Require that projects in commercial areas be designed and developed to achieve a high level of quality, distinctive character, and compatibility with appropriate existing uses and development.

Program: The Plan Map designates land uses, zones, and height districts to achieve compatibility of uses and intensity between new and existing development in commercial areas and preserve viewsheds.

In addition to the above referenced objectives, policies, and programs, the Community Plan describes the North Broadway commercial corridor as a challenging opportunity for revitalization efforts due to high vacancy rates and rapid turnover. Allowing the General Plan Amendment and Zone Change will facilitate new investment into the North Broadway corridor while maintaining the character of the neighborhood through the preservation and reuse of the existing buildings.

The project site is located within the Lincoln Heights neighborhood of the Northeast Los Angeles Community Plan. This neighborhood is characterized by single and multi-family residential uses as well as low scale neighborhood commercial corridors. As recommended, the amendment would re-designate the project site from Low Residential to Neighborhood Commercial. The amendment of the land use designation, in conjunction with the recommended zone change to (T)(Q)C4-1D and (T)(Q)C4-1D-HPOZ, would allow the adaptive reuse and change of use of the site to storage, office and motion picture/television uses. The site is located on a site designated and zoned for low residential land uses but has continually been utilized for institutional uses. The ability to adaptively reuse the subject site without the recommended amendment and zone change is not possible as commercial uses are not permitted by-right in the existing land use designation and zone. Additionally, the subject site has been identified as containing contributing structures to the Lincoln Heights HPOZ according to the Lincoln Heights Historic Resources Survey, which potentially limits demolition and physical changes to the existing structures within the HPOZ.

6. **Framework Element.** The Framework Element for the General Plan (Framework Element) was adopted by the City of Los Angeles in December 1996 and re-adopted in August 2001. The Framework Element provides guidance regarding policy issues for the entire City of Los Angeles, including the project site. The Framework Element also sets forth a Citywide comprehensive long-range growth strategy and defines Citywide policies regarding such

issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services. The Framework Element includes the following provisions, objectives, and policies relevant to the instant request:

Economic Development

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

Objective 7.2.2: Establish a balance of land uses that provide for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.

Goal 7C: A City with thriving and expanding business.

Objective 7.3.2: Retain existing neighborhood commercial activities within walking distance of residential areas.

As described above, the Lincoln Heights area of the Community Plan consists of a long-standing commercial corridor with a mix of single and multi-family residential uses surrounding it. The proposed project would increase the job supply and commercial and professional services into the area. Because of the existing structures' age and architectural style, they are considered contributing structures to the Lincoln Heights HPOZ; therefore, their size, scale, and overall appearance are character defining features of the HPOZ and inherently related to the overall character of the surrounding neighborhood. Additionally, the adjacent commercial property to the south of the project site is zoned C4. Therefore, the proposed project would support a gradual transition and buffer in scale and character between the new commercial strip mall development and the surrounding historic residential uses on the north, east and west sides of the subject site. By enabling the proposed change of use and adaptive reuse of the existing school and institutional structures into commercial office use in close proximity to existing housing supply, the proposed amendment would be considered consistent with these goals and objectives of the Framework Element of the General Plan.

7. **Housing Element.** The Housing Element of the General Plan is not likely to be affected by the recommended action herein. The site is located on a site designated and zoned for low residential land uses but has continually been utilized for institutional uses. As currently zoned, it is consistent with the existing land use designation. However, the existing structures and previous uses utilized at the site do not conform to what the current designation and zone allow by-right. Additionally, the designation of the existing structures as historic, further limit how much they can physically change. The recommended designation and zone would be compatible with both surrounding commercial designations as well as with the existing structures and previous uses. Due to the proposed project being limited to a change of use with no demolition and a potential future development of additional office space, the proposed project will create a reasonable transition between the neighboring residences and commercial corridor along North Broadway.
8. **Mobility Element.** The Mobility Element of the General Plan is not likely to be affected by the recommended action herein. The proposed project will maintain the existing rights-of-way in support of pedestrian movement and connectivity between the surrounding residential and non-residential uses. The east side of the property is currently unimproved; however, the Applicant will be working with the Bureau of Engineering to comply with the

required improvements to accommodate for an increase in pedestrian connectivity between residential and commercial uses.

- 9. Health and Wellness Element and Air Quality Element.** Policy 5.1 and 5.7 of the Plan for a healthy LA, the Health and Wellness Element, and Policy 4.2.3 of the Air Quality Element are policy initiatives related to the reduction of air pollution and greenhouse gases. Introducing a new office use within existing buildings in an area well served by local transit, complies with stated policies that require projects to contribute to reducing greenhouse gas emissions through integrated land use and transportation planning.

Policy 2.2 of the Plan is a policy initiative related to the adaptive reuse of buildings for healthy living and working conditions. The proposed project would comply with applicable provisions of the CALGreen Code and the Los Angeles Green Building Code which will serve to reduce the project's energy use. Furthermore, as conditioned and in compliance with Code requirements, electric vehicle (EV) parking and solar/electric generators will be provided, and the existing buildings will be solar-ready as required by the Department of Building and Safety. Therefore, the project would promote healthy working conditions, reduce air pollution and promote land use policies that help to reduce greenhouse gas emissions.

10. Vesting Zone Change Findings.

The proposed zone change is in substantial conformance with the purposes, intent, and provisions of the General Plan and is in conformity with public necessity, convenience, general welfare and good zoning practice. The City of Los Angeles' General Plan consists of the Framework Element, seven required Elements that are mandated by State law, including the Land Use, Mobility, Housing, Conservation, Noise, Safety, and Open Space Elements along with optional Elements such as the Air Quality, Service Systems, and Plan for a Healthy Los Angeles. The Land Use Element is comprised of the 35 individual Community Plans of Los Angeles. This Element provides relevant goals, objectives, policies, and programs that are established in the General Plan that form the basis for staff's recommended actions for the proposed project.

- a. Pursuant to Section 12.32 C of the Municipal Code, and based on these findings, the recommended action is deemed consistent with public necessity, convenience, general welfare and good zoning practice.**

Public Necessity, Convenience, and General Welfare

As previously mentioned, the project site is located within the Lincoln Heights neighborhood of the Northeast Los Angeles Community Plan. The Community Plan describes the Lincoln Heights and Montecito Heights neighborhoods as containing the oldest traces of urban development in Northeast Los Angeles, dating from the 1870's. It also describes the North Broadway commercial corridor as a challenging opportunity for revitalization efforts due to high vacancy rates and rapid turnover. Additionally, several of the existing structures on the site are designated as "Contributing Structures" within the Lincoln Heights HPOZ, potentially limiting demolition and physical changes to the existing buildings within the HPOZ.

As the site has historically been occupied by institutional uses, the recommended amendment and zone change to the Neighborhood Commercial designation and (T)(Q)C4-1D and (T)(Q)C4-1D-HPOZ zone would not eliminate any existing residential uses. Instead, it would permit a mix of uses that is compatible with the proposed change of use and other similar uses in the vicinity and along this commercial corridor in the Lincoln Heights neighborhood. The amendment of the land use designation, in

conjunction with the recommended zone change would allow the adaptive reuse and change of use of the site to an office use. The site is located on a site designated and zoned for low residential land uses but has continually been utilized for institutional uses. The ability to adaptively reuse the subject site without the recommended amendment and zone change is not possible as commercial uses are not permitted by-right in the existing land use designation and zone.

The proposed project will not only create employment opportunities within the Northeast Los Angeles Community Plan area, but it will also accommodate a diverse professional/business entity not otherwise currently found in the surrounding community. The proposed project will locate new commercial uses within walking distance of existing single and multi-family residential uses as well as other commercial and institutional uses. The proposed project is also located near public transit such as the Metro Bus Lines 45 and 252 on North Broadway and the Lincoln Heights/Chinatown LADOT Dash Line on North Broadway one block (approximately 150-feet) to the south of the project site. Additionally, the project site is located approximately 0.95 miles away from the Lincoln/Cypress Station, providing service to the Metro Gold Line. As proposed, the project would be consistent with the public necessity, convenience, and general welfare of the surrounding area.

Good Zoning Practice

The Community Plan designates the site with a land use designation of Low Residential, which lists the RE9, RS, R1, RU, RD6, and RD5 Zones as corresponding zones. As recommended, the subject amendment would re-designate the project site to the Neighborhood Commercial land use designation, which lists the following corresponding zones: C1, C1.5, C2, C4, and P. The recommended change to the zone (T)(Q)C4-1D and (T)(Q)C4-1D-HPOZ would be consistent with the adoption of the recommended Plan Amendment and would be in substantial conformance with the purpose, intent, and provisions of the General Plan as it is reflected within the Northeast Los Angeles Community Plan. The existing land use designation and zone would not currently allow commercial uses. The amendment of the land use designation, in conjunction with the recommended zone change to (T)(Q)C4-1D and (T)(Q)C4-1D-HPOZ would allow the adaptive reuse, change of use of the site to storage, office and motion picture/television uses, and future addition. The project is located on a site designated and zoned for low residential land uses but that has continually been utilized for institutional uses. The ability to adaptively reuse the subject site without the recommended amendment and zone change is not possible as commercial uses are not permitted by-right in the existing land use designation and zone.

- b. **Pursuant to Section 12.32 G and Q of the Municipal Code “T” and “Q” Classification Findings.** The current action, as recommended, has been made contingent upon compliance with new “T” and “Q” conditions of approval imposed herein for the proposed project. As recommended, the Zone Change has been placed in temporary “T” and “Q” Classification in order to ensure that necessary public improvements and dedications for future right of way improvements are provided as part of this legislative action. The “T” Conditions are necessary to ensure the identified dedications, improvements, and actions are undertaken to meet the public’s needs, convenience, and general welfare served by the actions required. These actions and improvements will provide the necessary infrastructure to serve the proposed community at this site, including sidewalk improvements along Gates Street. The “Q” Conditions limit the use of the site to office only and ensures that the current buildings on site are retained. These conditions are necessary to ensure that the scale and scope

of future development on the site remain as they exist today and to protect the best interests of and to assure a development more compatible with surrounding properties and the overall pattern of development in the community, to secure an appropriate development in harmony with the General Plan, and to prevent or mitigate the potential adverse environmental effects of the subject recommended action.

- c. **Pursuant to Section 12.32-G and Q of the Municipal Code “D” Limitation Findings. The Council shall find that any or all the limitations are necessary: (1) to protect the best interests of and assure a development more compatible with the surrounding property or neighborhood, and (2) to secure an appropriate development in harmony with the objectives of the General Plan, or (3) to prevent or mitigate potentially adverse environmental effects of the Height District establishment or change.**

The project site is located within the Northeast Hillside Qualified [Q] Conditions and Development [D] Limitations (Ordinance No. 180,403), also known as NEHO. The NEHO area was established in 2008 to place development controls on residential development in the sensitive hillside areas of Northeast Los Angeles. Limitations include grading, floor area, height, landscaping and building design, among others. The NEHO mainly applies to OS, A, single family and low density R and the C1.5 Zones. The NEHO limitations are denoted by the permanent Q and D limitation symbols on the site’s zoning. The site is currently limited by the NEHO as it is zoned R1. The site would not be subject to the regulations of the NEHO as the only commercial zone that the NEHO regulates is the C1.5 Zone. Therefore, in order to ensure that the best interests of the public are furthered, and the character of the hillside and neighborhood does not change with the introduction of the new use, the D Limitation to limit height and floor area to be compatible with the surrounding area is necessary. These limitations will ensure that while the NEHO would no longer apply given the new zone on the site, the scale and character of the development will remain unchanged, securing an appropriate development in harmony with the objectives of the General Plan.

Environmental Findings

- 11. Environmental Finding.** A Negative Declaration (ND) (ENV-2019-4984-ND) and Errata, dated January 18, 2022, were prepared for the proposed project in compliance with the California Environmental Quality Act (CEQA). On the basis of the whole of the record before the lead agency including any comments received, the lead agency finds that, there is no substantial evidence that the proposed project will have a significant effect on the environment. The attached Negative Declaration reflects the lead agency’s independent judgment and analysis. The records upon which this decision is based are with the Environmental Review Section of the City Planning Department, 221 N. Figueroa Street, Suite 1350, Los Angeles, CA 90021.
- 12. Flood Insurance.** The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have been reviewed and it has been determined that this project is located in Zone X, outside of a flood zone.

PUBLIC HEARING AND COMMUNICATIONS

Summary of Public Hearing Testimony and Communications Received

The Public Hearing on this matter was held telephonically via Zoom, on September 24, 2020 which was conducted by the Hearing Officer on behalf of the City Planning Commission related to Case No. CPC-2019-4983-GPA-VZC. The hearing was attended by a few community members, a representative of the Lincoln Heights Neighborhood Council, and a Council District 1 Representative.

Communications

Planning staff has received communications regarding the proposed project from the Neighborhood Council, Council Office, and the Los Angeles Planning Alliance. The communications are summarized below:

The Lincoln Heights Neighborhood Council submitted a letter dated September 29, 2019 stating support of the proposed project and requested entitlements.

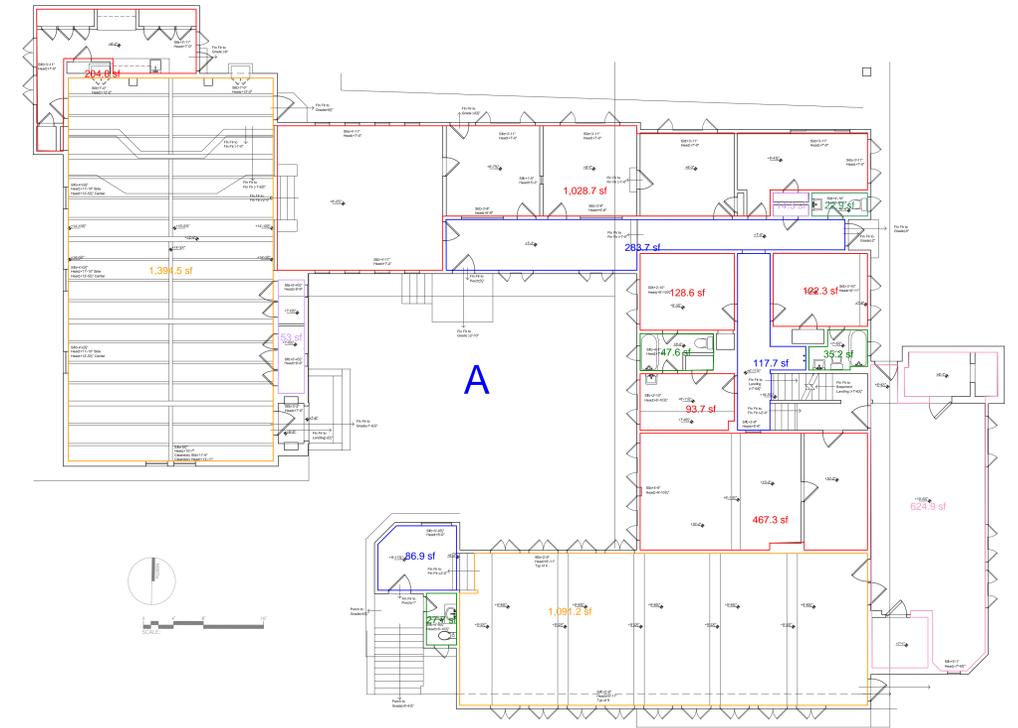
Council District 1 submitted a letter dated September 24, 2020, stating support of the proposed project, and requested entitlements. They stated support of a limited expansion of the HPOZ boundary for the purposes of including the original chapel building as a contributing structure to the HPOZ, as well as support for improvement waivers along Thomas and Altura Street.

After the initial public hearing on September 24, 2020, the applicant changed the project description to include the potential for 10,000 square feet of additional floor area for office and motion picture/television uses. A public hearing is required at the CPC meeting to take testimony regarding the new project description.

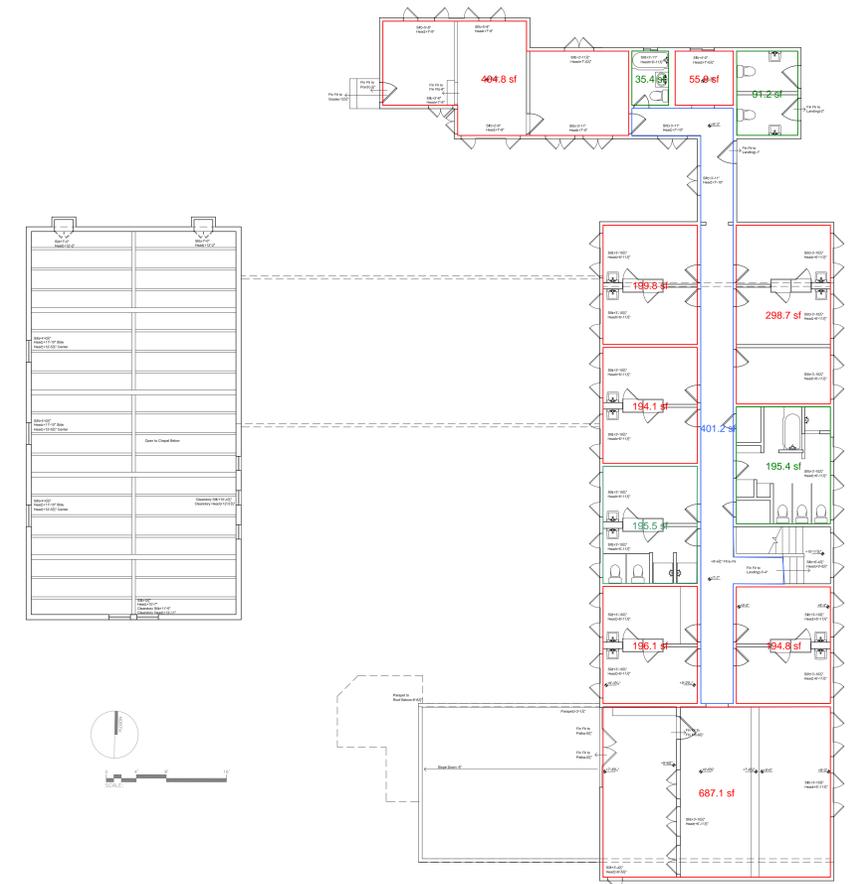
The LA Planning Alliance submitted a letter dated January 11, 2022 stating support of the proposed project and entitlements including the potential future development of 10,000 square feet.

BUILDING A: 2436 Gates Street As-built Floor Plan (no changes)

Building	Building SF	Previous Use	Proposed Use
A	8,928 SF	Chapel, Kitchen/Dining, Offices, Lounge, Convent	Office
B	1,422 SF	Kindergarten	Office
C	678 SF	Kindergarten	Office
D	2,970 SF	Pre-K Building	Office
E	1,794 SF	Nursery (infants/toddlers)	Office
F	1,154 SF	Storage	Storage
G	372 SF	Storage	Storage
TOTAL	17,318 SF		



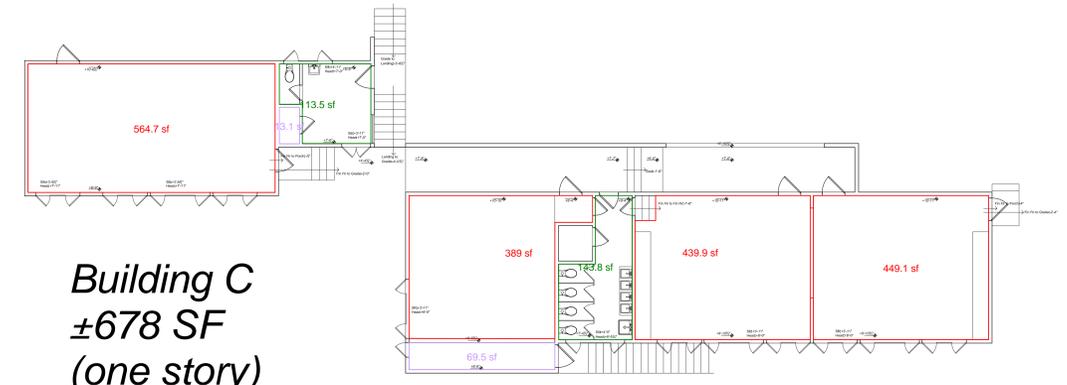
Building A Floor 1 = ±5,778 SF



Building A Floor 2 = ±3,150 SF

BUILDING B & C: 2436 Gates Street
As-built Floor Plan (no changes)

Building	Building SF	Previous Use	Proposed Use
A	8,928 SF	Chapel, Kitchen/Dining, Offices, Lounge, Convent	Office
B	1,422 SF	Kindergarten	Office
C	678 SF	Kindergarten	Office
D	2,970 SF	Pre-K Building	Office
E	1,794 SF	Nursery (infants/toddlers)	Office
F	1,154 SF	Storage	Storage
G	372 SF	Storage	Storage
TOTAL	17,318 SF		



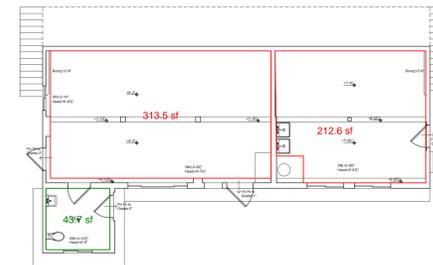
Building C
±678 SF
(one story)

Building B
±1,422 SF
(one story)

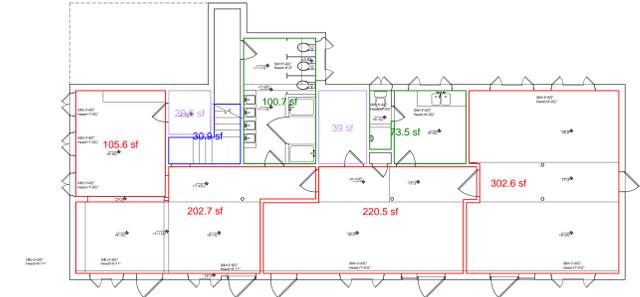
BUILDING D & E: 2436 Gates Street

As-built Floor Plan (no changes)

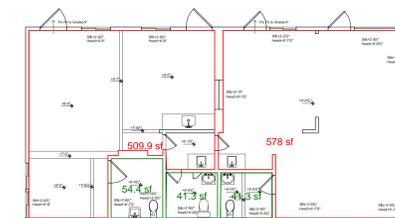
Building	Building SF	Previous Use	Proposed Use
A	8,928 SF	Chapel, Kitchen/Dining, Offices, Lounge, Convent	Office
B	1,422 SF	Kindergarten	Office
C	678 SF	Kindergarten	Office
D	2,970 SF	Pre-K Building	Office
E	1,794 SF	Nursery (infants/toddlers)	Office
F	1,154 SF	Storage	Storage
G	372 SF	Storage	Storage
TOTAL	17,318 SF		



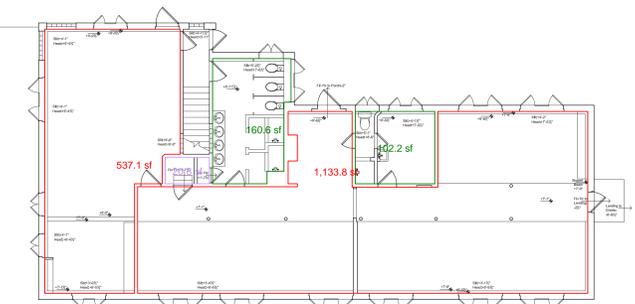
Building E Floor 1
±570 SF



Building D Floor 1
±1,037 SF

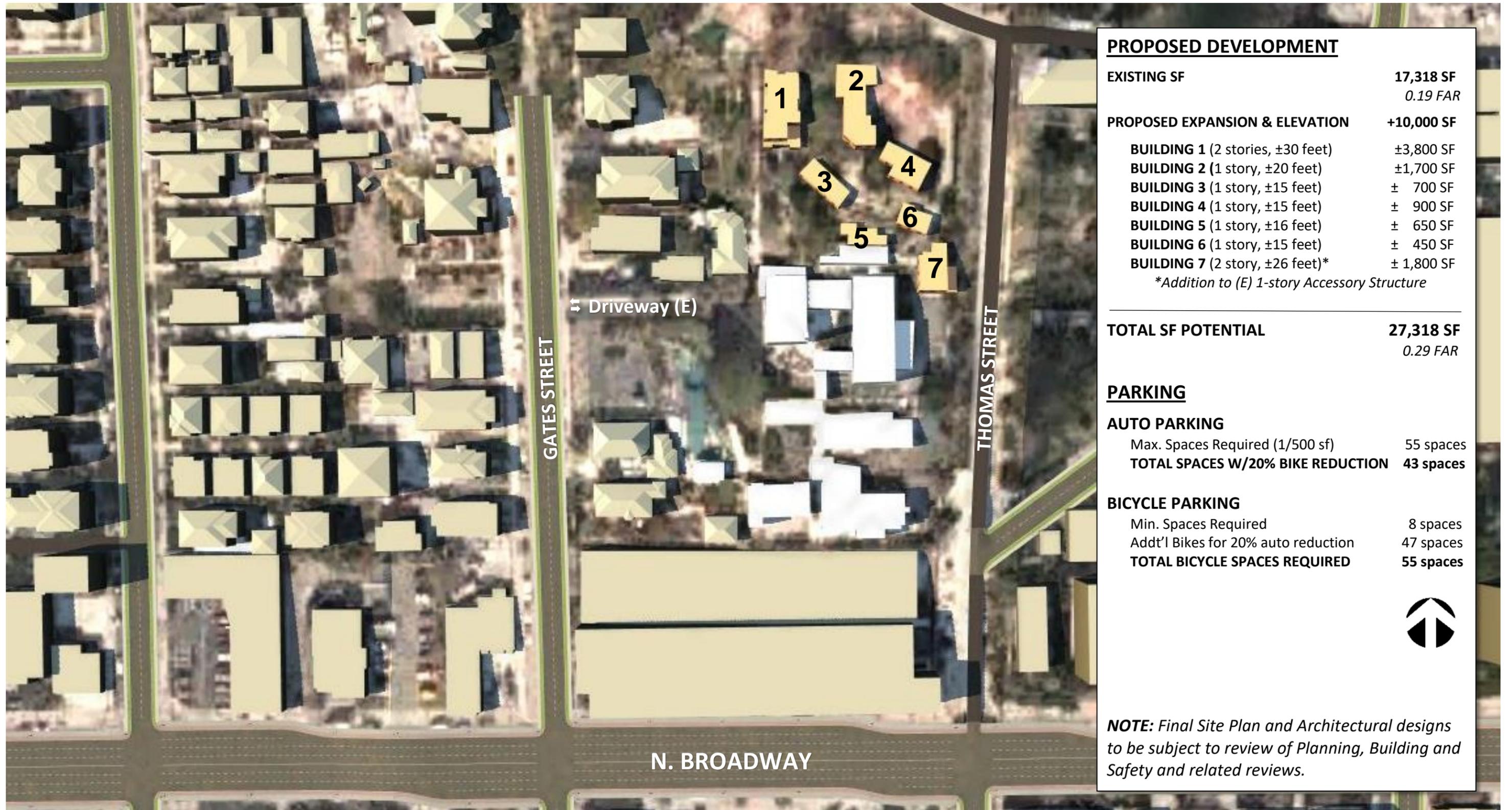


Building E Floor 1
±1,225 SF



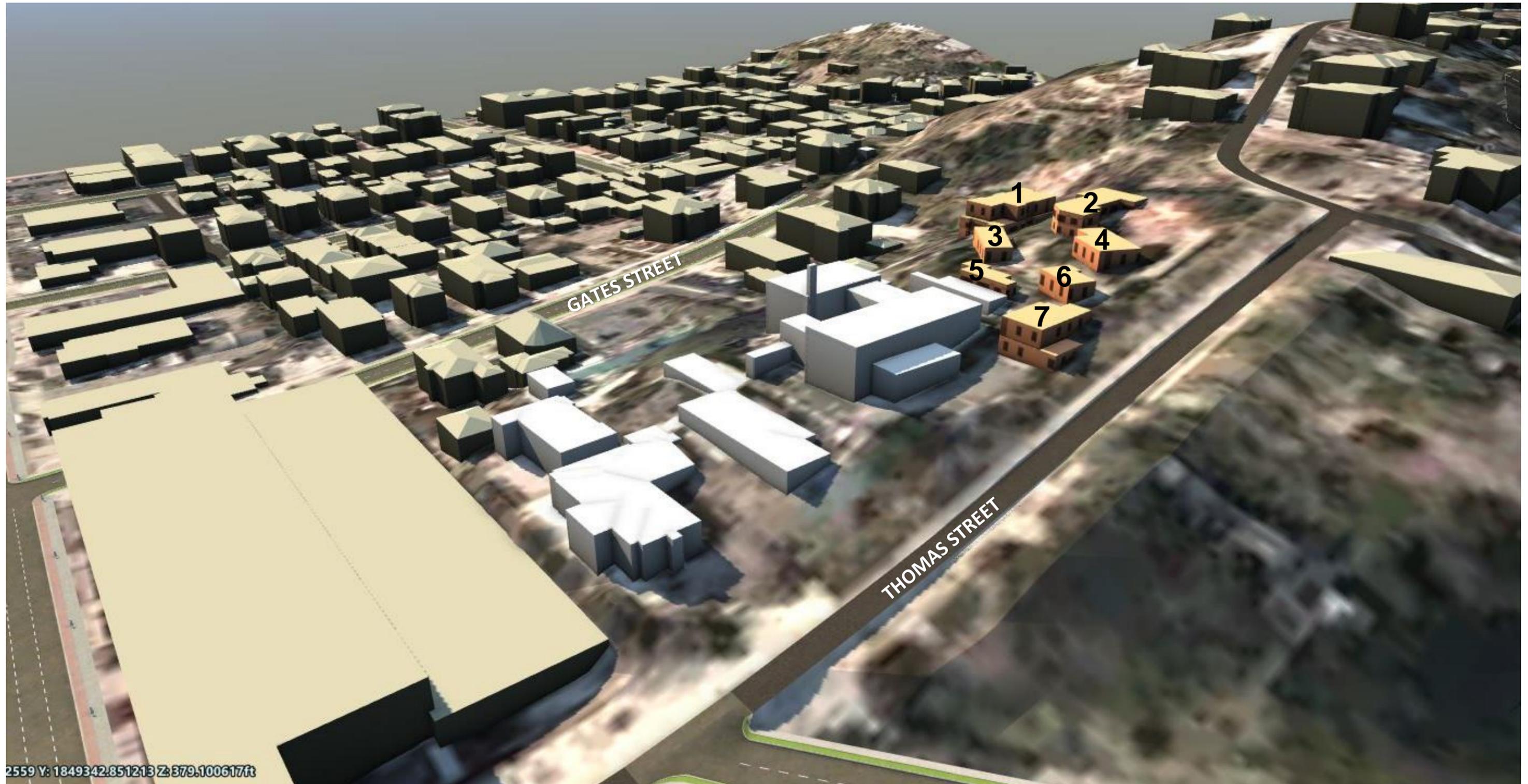
Building D Floor 2
±1,934 SF

2436 N. GATES | DEVELOPMENT POTENTIAL CONCEPTUAL AERIAL (REVISED AUGUST 31, 2021)

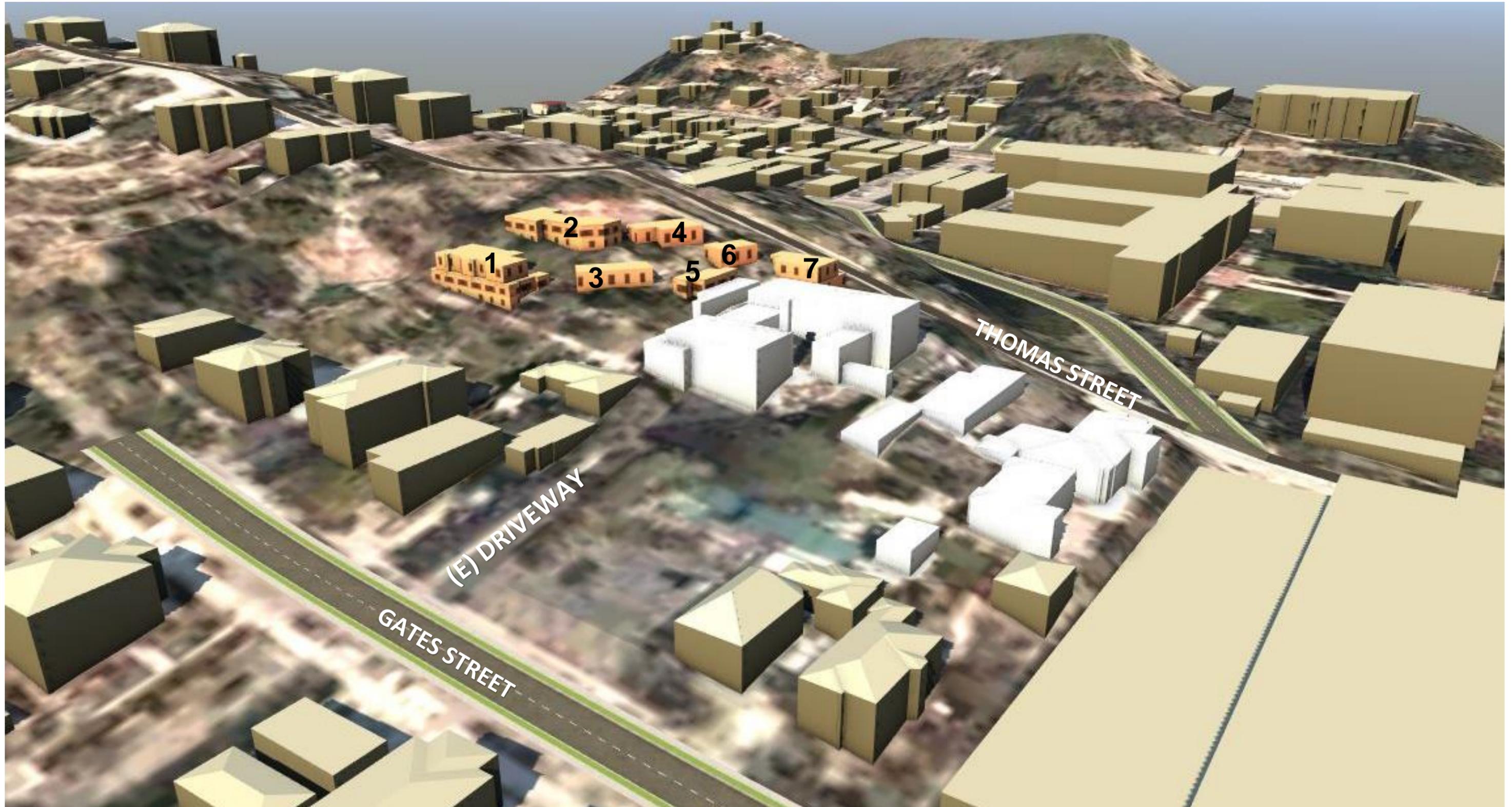


PROPOSED DEVELOPMENT	
EXISTING SF	17,318 SF 0.19 FAR
PROPOSED EXPANSION & ELEVATION	+10,000 SF
BUILDING 1 (2 stories, ±30 feet)	±3,800 SF
BUILDING 2 (1 story, ±20 feet)	±1,700 SF
BUILDING 3 (1 story, ±15 feet)	± 700 SF
BUILDING 4 (1 story, ±15 feet)	± 900 SF
BUILDING 5 (1 story, ±16 feet)	± 650 SF
BUILDING 6 (1 story, ±15 feet)	± 450 SF
BUILDING 7 (2 story, ±26 feet)*	± 1,800 SF
<i>*Addition to (E) 1-story Accessory Structure</i>	
TOTAL SF POTENTIAL	27,318 SF 0.29 FAR
PARKING	
AUTO PARKING	
Max. Spaces Required (1/500 sf)	55 spaces
TOTAL SPACES W/20% BIKE REDUCTION	43 spaces
BICYCLE PARKING	
Min. Spaces Required	8 spaces
Add'l Bikes for 20% auto reduction	47 spaces
TOTAL BICYCLE SPACES REQUIRED	55 spaces
	
NOTE: Final Site Plan and Architectural designs to be subject to review of Planning, Building and Safety and related reviews.	

CONCEPTUAL MASSING
AXIO AERIAL - FACING NORTHWEST



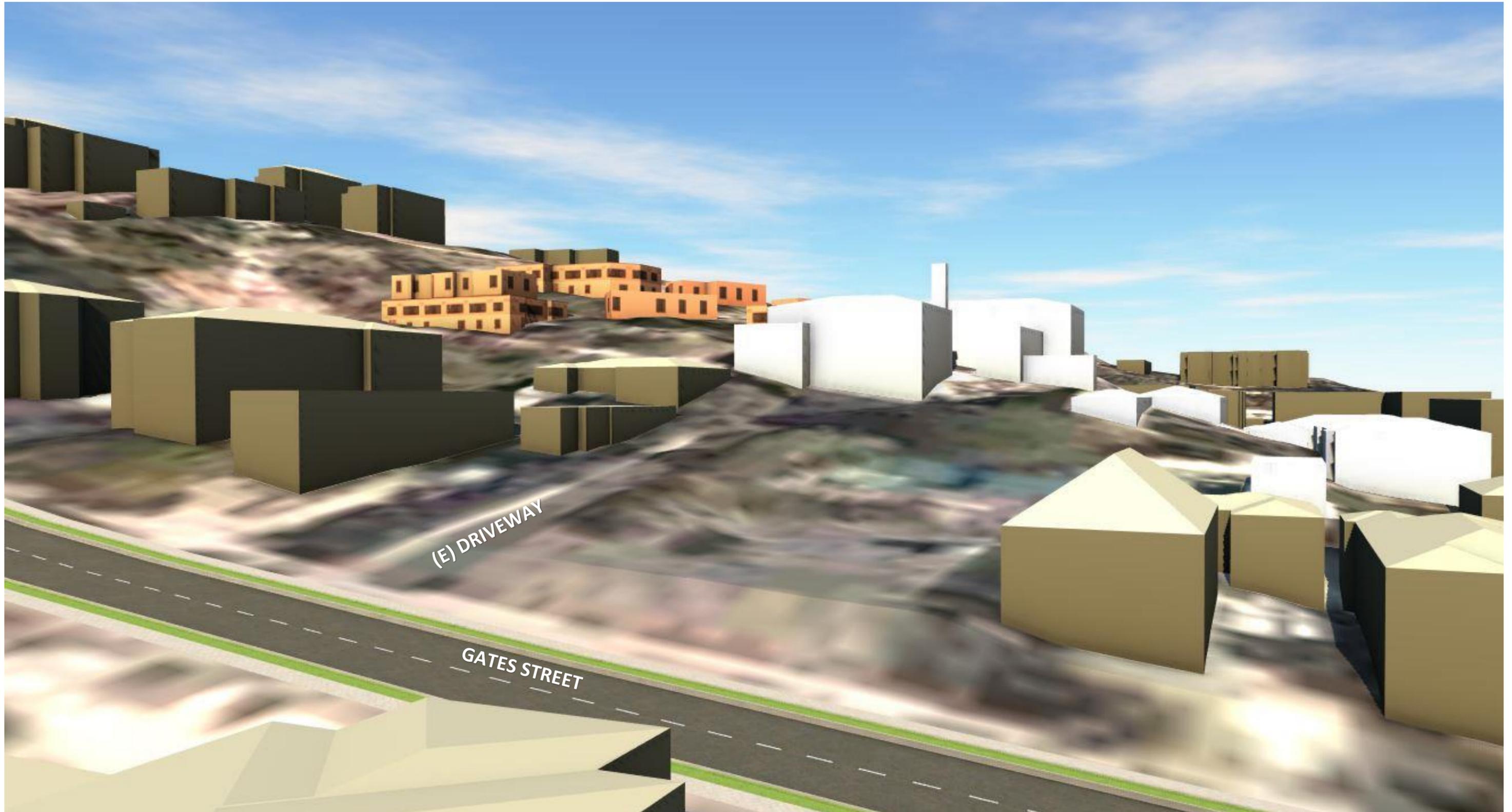
CONCEPTUAL MASSING
AXIO AERIAL - FACING NORTHEAST



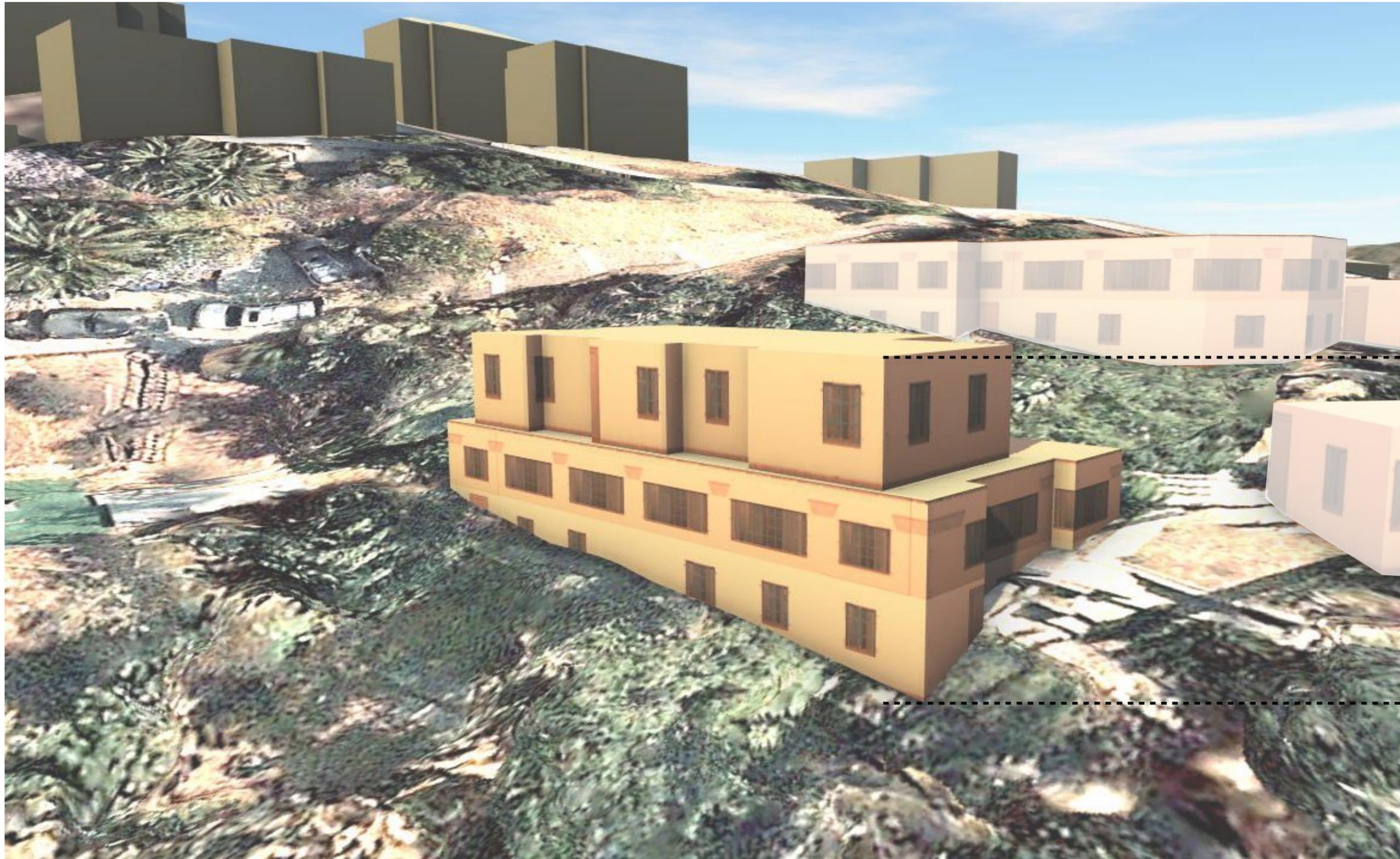
CONCEPTUAL MASSING
FACING NORTH



CONCEPTUAL MASSING
FACING NORTHEAST FROM GATES



PERSPECTIVE ELEVATION
BUILDING 1 – FACING NORTHEAST



..... BUILDING 1
..... 30 FEET

PERSPECTIVE ELEVATION
BUILDING 2 – FACING NORTHEAST



BUILDING 2
20 FEET

PERSPECTIVE ELEVATION
BUILDING 3 – FACING NORTHEAST



BUILDING 3
15 FEET

Z: 461.589731ft

PERSPECTIVE ELEVATION
BUILDING 4 – FACING NORTHEAST



BUILDING 4
15 FEET

PERSPECTIVE ELEVATION
BUILDING 5 – FACING NORTHEAST



BUILDING 5
16 FEET

PERSPECTIVE ELEVATION
BUILDING 6 – FACING NORTHEAST

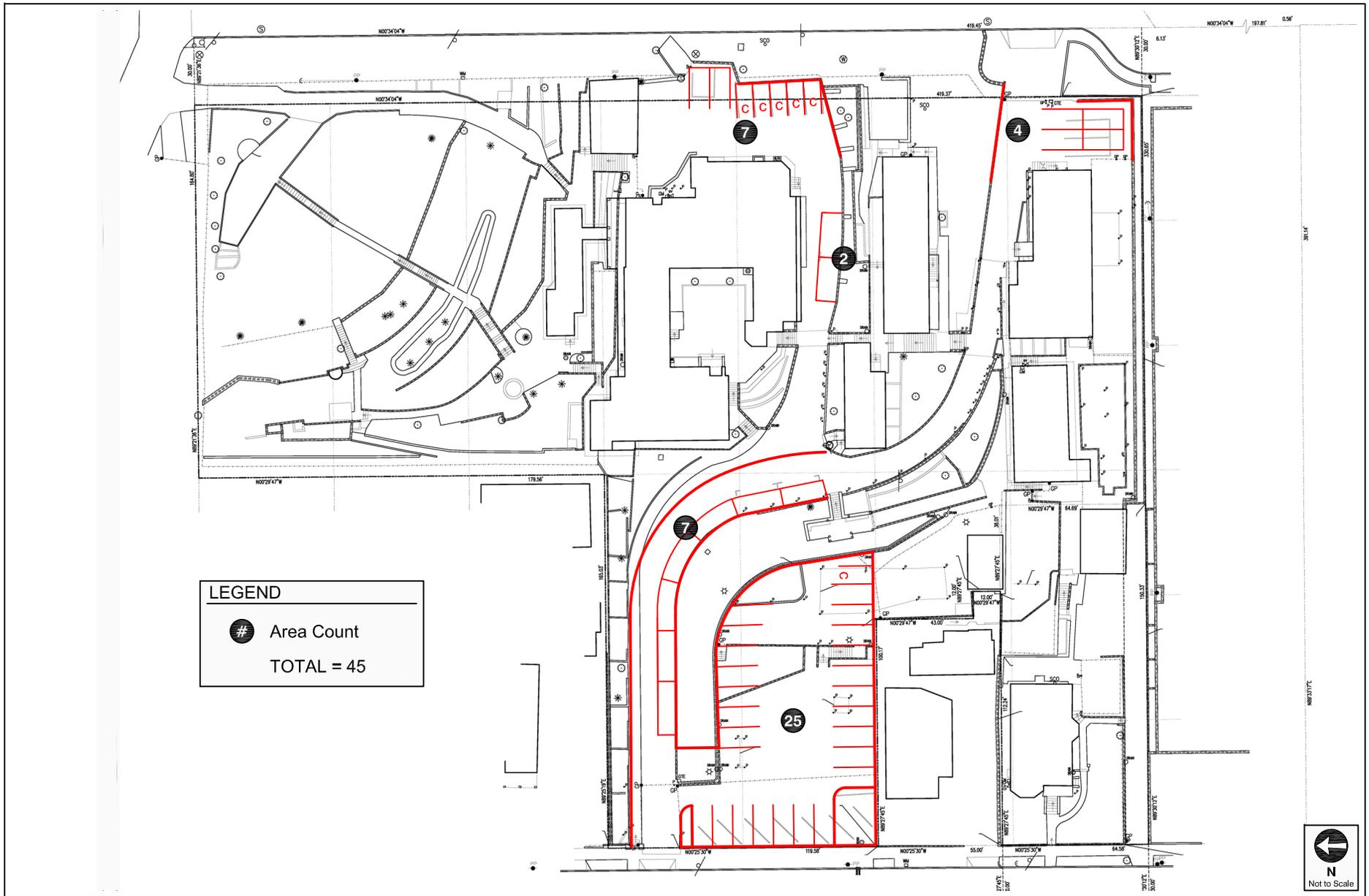


BUILDING 6
15 FEET

PERSPECTIVE ELEVATION
BUILDING 7 – FACING NORTHWEST



--- BUILDING 7 ---
26 FEET

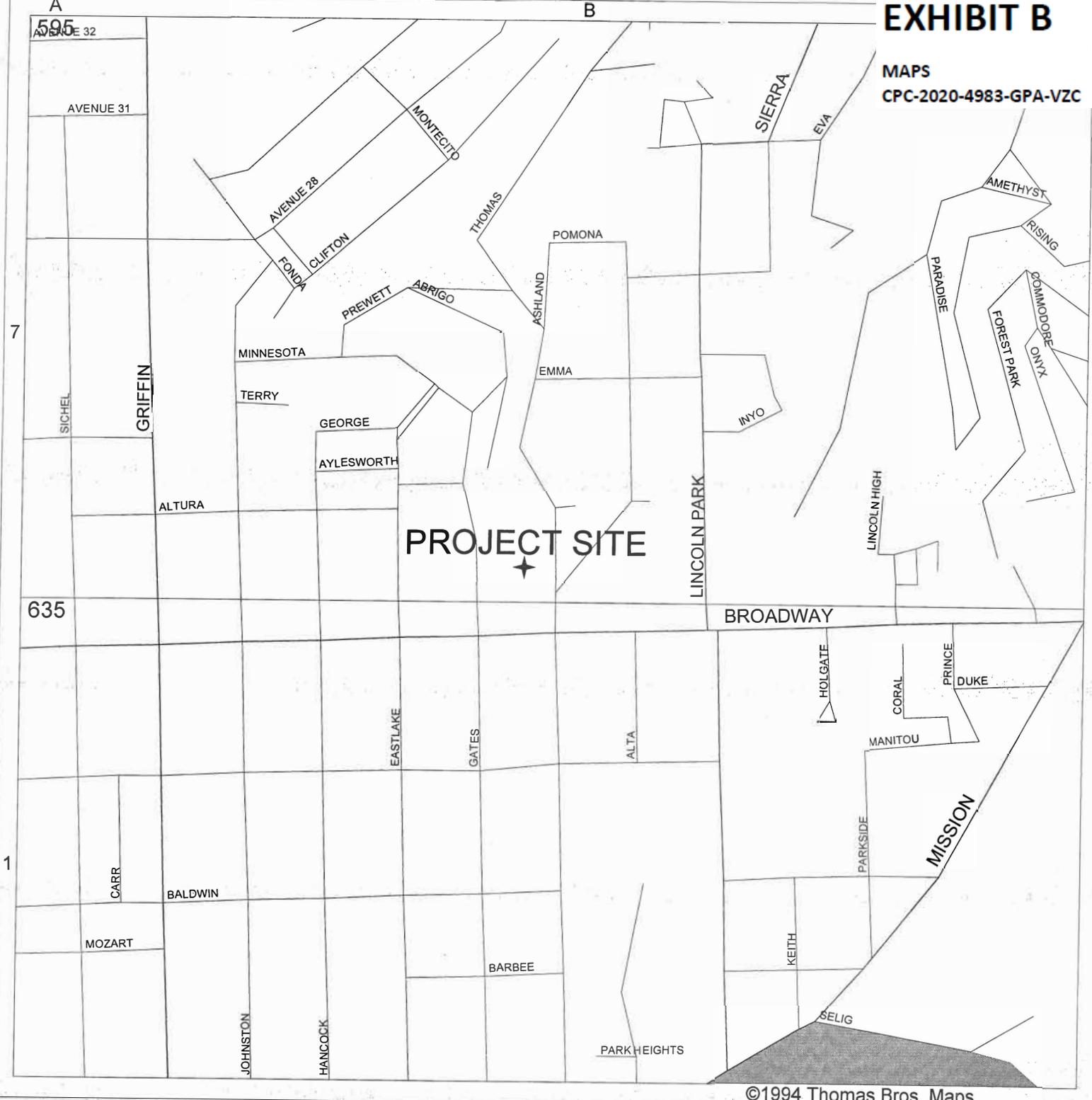


CONCEPTUAL PARKING AREAS

FIGURE
1

EXHIBIT B

MAPS
CPC-2020-4983-GPA-VZC



©1994 Thomas Bros. Maps

VICINITY MAP

SITE : 2417-2455 N. THOMAS STREET / 2428-2436 N. GATES STREET

GC MAPPING SERVICE, INC.

3055 WEST VALLEY BOULEVARD
ALHAMBRA CA 91803
(626) 441-1080, FAX (626) 441-8850
GCMAPPING@RADIUSMAPS.COM



EXISTING - NORTH EAST L.A. COMMUNITY PLAN

-  LO RESIDENTIAL - RE9,RS,R1,RD6,RD
-  LO MEDIUM I RESIDENTIAL - R2,RD3,RD4,R3,R4,R
-  LO MEDIUM II RESIDENTIAL - RD1,RD2,R2,R2
-  NEIGHBORHOOD COMMERCIAL - C1,C1P,C2,C4,RAS3
-  OPEN SPACE - OS,A1
-  PUBLIC FACILITIES - PF

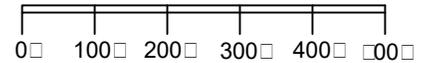


NOT A PART OF THIS APPLICATION.

CASE NO.

DATE: 08-12-2019

SCALE:



GC MAPPING SERVICE

3000 EST VALLEY BOULEVARD
 ALHAMBRA CA 91803
 (626) 441-1000, (626) 441-0000
 www.gcmapping.com



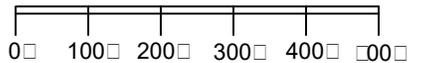
REQUESTED - NORTH EAST L.A. COMMUNITY PLAN

-  LOW DENSITY RESIDENTIAL - RE9,RS,R1,R2,RD6,RD7
-  LOW DENSITY MEDIUM I RESIDENTIAL - R2,RD3,RD4,R3,R4,R5
-  LOW DENSITY MEDIUM II RESIDENTIAL - RD1,RD2,R2,R2.1
-  NEIGHBORHOOD COMMERCIAL - C1,C1.1,P,C2,C4,RAS3
-  OPEN SPACE - OS,A1
-  PUBLIC FACILITIES - PF

 NOT A PART OF THIS APPLICATION.

CASE NO.

DATE: 08-12-2019

SCALE: 

GC MAPPING SERVICE

3000 EST VALLEY BOULEVARD
 ALHAMBRA CA 91803
 (626) 441-1000, (626) 441-0000
 www.gcmapping.com

EXHIBIT C

CITY OF LOS ANGELES CALIFORNIA



ERIC GARCETTI
MAYOR

ENVIRONMENTAL CLEARANCE ENV-2019-4987-ND

DIRECTOR

SHANA M.M. BONSTIN
DEPUTY DIRECTOR

ARTHI L. VARMA, AICP
DEPUTY DIRECTOR

LISA M. WEBBER, AICP
DEPUTY DIRECTOR

DEPARTMENT OF CITY PLANNING

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

SAMANTHA MILLMAN
PRESIDENT

CAROLINE CHOE
VICE-PRESIDENT

HELEN CAMPBELL
JENNA HORNSTOCK
HELEN LEUNG

YVETTE LOPEZ-LEDESMA
KAREN MACK
DANA M. PERLMAN
RENEE DAKE WILSON

2436 N Gates Street Project

Case Number: ENV-2019-4984-ND

Project Location: 2417-2455 N Thomas Street and 2428-2436 N Gates Street, Los Angeles, California, 90031

Community Plan Area: Northeast Los Angeles

Council District: 1—Cedillo

Project Description: The proposed project is a change of use from a school, daycare, convent, dormitories, playground, and chapel to office. The request includes a General Plan Amendment from Low Residential to Neighborhood Commercial and a Vesting Zone Change from [Q]R1-1D and [Q]R1-1D-HPOZ to [Q]C2-1D-HPOZ. The proposed project also includes the potential development of an additional 10,000 square feet of office use on portions of the project site that are outside the current HPOZ boundaries. There is no demolition and no grading proposed at this time.

PREPARED BY:

The City of Los Angeles
Department of City Planning

APPLICANT:

Josh Oreck/Christina Carter
Narrator Inc.

December 2021

INITIAL STUDY

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INITIAL STUDY

1 INTRODUCTION

This Initial Study (IS) document evaluates potential environmental effects resulting from operation of the proposed Project (“Project”). The proposed Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). Therefore, this document has been prepared in compliance with the relevant provisions of CEQA and the State CEQA Guidelines as implemented by the City of Los Angeles (City). Based on the analysis provided within this Initial Study, the City has concluded that the Project will not result in significant impacts on the environment. This Initial Study and Negative Declaration are intended as informational documents, and are ultimately required to be adopted by the decision maker prior to project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project’s approval even if significant environmental effects are anticipated.

An application for the proposed project has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the project is subject to CEQA, and the preparation of an Initial Study is required.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report should be prepared; otherwise the Lead Agency may adopt a Negative Declaration or a Mitigated Negative Declaration.

This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006).

1.2. ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into four sections as follows:

1 INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	2436 N GATES STREET
ENVIRONMENTAL CASE NO.	ENV-2019-4984-ND
RELATED CASES	CPC-2019-4983-GPA-ZC

PROJECT LOCATION	2417-2455 N Thomas Street and 2428-2436 N Gates Street
COMMUNITY PLAN AREA	NORTHEAST LOS ANGELES
GENERAL PLAN DESIGNATION	LOW RESIDENTIAL
ZONING	[Q]R1-1D AND [Q]R1-1D-HPOZ
COUNCIL DISTRICT	1 - CEDILLO

LEAD AGENCY	City of Los Angeles
STAFF CONTACT	NICOLE SÁNCHEZ
ADDRESS	CITY HALL, LOS ANGELES, CA 90012
PHONE NUMBER	213-978-3034
EMAIL	NICOLE.SANCHEZ@LACITY.ORG

APPLICANT	JOSH ORECK/CHRISTINA CARTER NARRATOR, INC.
ADDRESS	2343 VALLEY VIEW DRIVE, LOS ANGELES, CA 90026
PHONE NUMBER	323-666-5250

PROJECT DESCRIPTION

The proposed project is a change of use from a school, daycare, convent, dormitories, playground, and chapel to office. The request includes a General Plan Amendment from Low Residential to Neighborhood Commercial and a Vesting Zone Change from [Q]R1-1D and [Q]R1-1D-HPOZ to [Q]C2-1D-HPOZ. The proposed project also includes the potential development of an additional 10,000 square feet of office use on portions of the project site that are outside the current HPOZ boundaries. There is no demolition and no grading proposed at this time.

(For additional detail, see “Section 3. PROJECT DESCRIPTION”).

ENVIRONMENTAL SETTING

The subject property consists of 11 lots, with street frontages along Thomas Street, Altura Street and Gates Street. The frontage along Thomas Street measures approximately 420 feet; the frontage along a portion of Altura Street measures approximately 54 feet; and the frontage along Gates Street measures approximately 120 feet. The project site is an irregular shape with a total site size of 93,340 square feet. The project site is located within the Northeast Los Angeles Community Plan, within the Northeast Hillside Ordinance (NEHO) area, and partially (six lots) within the Lincoln Heights Historic Preservation Overlay Zone (HPOZ). The site is zoned [Q]R1-1D and [Q]R1-1D-HPOZ, designated for Low Residential land uses and is currently improved with a school, daycare, convent, dormitories, playground, and chapel. All existing structures are currently vacant and unoccupied. There are no trees within the public right-of-way next to the subject site that will be removed as part of the project scope and there are three (3) on-site palm trees that are proposed for removal as part of the proposed project.

(For additional detail, see “Section 3. PROJECT DESCRIPTION”).

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

(e.g. permits, financing approval, or participation agreement)

None.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities / Service Systems |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Geology / Soils | <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions 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.

Nicole Sánchez PRINTED NAME	City Planner TITLE
 SIGNATURE	12/10/21 DATE

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Mitigated Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

- a) The significance criteria or threshold, if any, used to evaluate each question; and
- b) The mitigation measure identified, if any, to reduce the impact to less than significance.

INITIAL STUDY

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The proposed project is a change of use from a school, daycare, convent, dormitories, playground, and chapel to office. The request includes a General Plan Amendment from Low Residential to Neighborhood Commercial and a Vesting Zone Change from [Q]R1-1D and [Q]R1-1D-HPOZ to [Q]C2-1D-HPOZ. The proposed project also includes the potential development of an additional 10,000 square feet of office use on portions of the project site that are outside the current HPOZ boundaries. There is no demolition and no grading proposed at this time.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The subject site (2417-2455 N Thomas Street / 2428-2436 N Gates Street) has a street frontage along Thomas Street that measures approximately 420 feet; frontage along a portion of Altura Street that measures approximately 54 feet; and frontage along Gates - Street that measures approximately 120 feet. The project site is located within the Northeast Los Angeles Community Plan, within the Northeast Hillside Ordinance area, and partially (six lots) within the Lincoln Heights Historic Preservation Overlay Zone (HPOZ).

3.2.2 Existing Conditions

The project site is an irregular shape with a total site size of 93,340 square feet. It is currently improved with a school, daycare, convent, dormitories, playground, chapel, and surface parking area. All existing structures are currently vacant and unoccupied. The site is zoned [Q]R1-1D and [Q]R1-1D-HPOZ and is designated for Low Residential land uses. The subject site is located 0.56 kilometers from the Upper Elysian Park Fault Zone and is located within the Special Grading Area (BOE Basic grid Map A-13372). The site is within a designated Hillside area, the Urban Agricultural Incentive Zone, and a Very High Fire Severity Zone. The site is not within a designated airport hazard, coastal zone, farmland, hazardous waste site, landslide, liquefaction, fault rupture, or tsunami inundation zone. There are three (3) on-site palm trees and no trees within the public right-of-way adjacent to the subject site that are proposed for removal.

Of the total 11 lots that the project site comprises, six (6) of them are within the Lincoln Heights HPOZ. The campus in its entirety was identified as a Contributing Element to the Lincoln Heights HPOZ.. The structures on the campus are proposed to be preserved and maintained to allow for their adaptive reuse as office space.

3.2.3 Surrounding Land Uses

The subject site is located north of North Broadway in the eastern edge of the Lincoln Heights area of the Northeast Community Plan. It is located generally between Gates Street and Thomas Street. The project site is located 2.5 miles northeast of Downtown Los Angeles, approximately 0.75 miles east of the Golden State (I-5) Freeway and 1.25 miles north of the San Bernardino (I-10) Freeway. The project site is also located approximately 0.95 miles away from the Lincoln/Cypress Station of the Metro Gold Line. The subject site has three street frontages: Thomas Street, Altura Street, and Gates Street. Thomas Street is designated a Local Street – Standard with a designated right-of-way width of 60 feet and designated roadway width of 36 feet; Altura Street is designated a Local Street – Standard with a designated right-of-way width of 60 feet and designated roadway width of 36 feet; and Gates Street is designated a Local Street – Standard with a designated right-of-way width of 60 feet and designated roadway width of 36 feet

The subject site is surrounded on the north, east, and west by a mix of one- to two-story single and multi-family dwellings. There is an adjacent commercial strip mall (currently under construction) located south of the project site. To the east is the Lincoln Senior High School and Pueblo High School. To the south is also the Gates Street elementary School. The North Broadway corridor is designated for, and consists of neighborhood commercial uses, and serves as the connector to Downtown Los Angeles. Properties to the north are zoned [Q]R1-1D. Properties to the east are zoned [Q] R1-1D, [Q]OS-1XLD, and [Q]PF-1D. Properties to the south are zoned [Q]C4-1VL-CDO and properties to the west are zoned [Q]RD3-1D-HPOZ.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The proposed project is a change of use from a school, daycare, convent, and chapel to office. There is no demolition, and no grading is proposed at this time. There are three (3) palm trees on-site and no trees within the public right-of-way that will be removed as part of the proposed scope. The existing structures, which are proposed to remain, measure approximately 17,318 square feet, with a maximum of 29.12 feet in height, and include approximately 36,395 square feet of open space and landscaping, 39 automobile parking spaces, and five (5) bicycle parking spaces (2 short-term and 3 long-term). Minor improvements to the existing structures that are proposed to remain may be necessary to comply with current codes as part of the change of use process. Any such improvements will be required to be in compliance with the applicable requirements of the HPOZ for those buildings within the HPOZ boundaries.

The applicant also requests up to 10,000 square feet of office use for a potential future development. The additional floor area will be in seven (7) one-and two-story buildings located in the northeast portion of the project site that is currently a landscaped garden area. If developed in the future, the open space would be reduced to approximately 29,745 square feet. The additional floor area will require the provision of 16 automobile parking spaces and three (3) bicycle parking spaces (1 short term and 2 long-term). The potential future development will be located on three (3) lots that are currently located outside the

boundaries of the HPOZ.

Of the 11 total lots that comprise the project site, six (6) of them are within the Lincoln Heights HPOZ. The campus in its entirety was identified as a Contributing Element to the Lincoln Heights HPOZ. These structures on the campus are proposed to be preserved and maintained to allow for their adaptive reuse as office space. The existing and contributing structures will not be altered so that they continue to contribute to the historic character of the surrounding community and the HPOZ.

The requested entitlements include a General Plan Amendment from Low Residential to Neighborhood Commercial; and a Vesting Zone Change from [Q]R1-1D and [Q]R1-1D-HPOZ to [Q]C2-1D-HPOZ.

3.3.2 Design and Architecture

The proposed project is a change of use from a school, daycare, convent, and chapel to office. There is no demolition, and no grading is proposed at this time. The applicant also requests up to 10,000 square feet of office use for a potential future development.

Six of the 11 lots that compose of the project site are included within the boundaries of the Lincoln Heights HPOZ. The campus in its entirety was identified as a Contributing Element to the Lincoln Heights HPOZ. These structures are categorized as contributing to the historic architectural qualities or historic associations for which a property is significant because it was present during the period of significance and possesses historic integrity reflecting its character at that time. The structures on site reflect Early Modern (1900-1945) and Post World War II styles (1945-1965). In line with these styles, the existing structures are simple masonry institutional buildings with long horizontal building lines and minimalistic design elements.

3.3.3 Open Space and Landscaping

The proposed project includes about 36,400 square feet of open space (29,745 sf of open space if the potential development is constructed in the future) and landscaping scattered throughout the site but concentrated to the north of the site. This open space is and will be composed of an outdoor terraced amphitheater, walkways, and a covered trellis area. Three (3) of the existing palm trees will be removed if the potential development is to be constructed.

3.3.4 Access, Circulation, and Parking

The subject site has three street frontages: Thomas Street, Altura Street, and Gates Street. Access to the site is provided through two (2) existing driveways, one on Gates Street and the other on Thomas Street. The Gates Street entrance on the west edge of the property serves as the primary entrance to the site. The second driveway is solely for emergency access and is not an entrance to the site.

There are 39 automobile parking spaces existing on-site. Based on the size of the proposed office use, a minimum of 35 automobile parking spaces are required for the

project. By incorporating the Bicycle Parking Ordinance reductions available (LAMC Section 12.21 A.4), the required automobile parking requirement is reduced to 28 spaces.

The potential development of an additional 10,000 square feet of office use would require a minimum of 16 additional automobile spaces, after applying the Bicycle Parking Ordinance reductions. Thus, a total of a minimum of 44 automobile parking spaces would be required for the project if the additional 10,000 square feet of office use is developed. The project proposes 45 automobile parking spaces on four (4) separate surface parking areas. No significant changes on-site are required in order to accommodate the additional parking spaces. The proposed project would provide 53 bicycle parking spaces upon full build out.

3.3.5 Sustainability Features

The project will be required to meet the latest in California/Uniform building codes, Title 24, and Cal-Green.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Negative Declaration will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to Los Angeles City Charter Section 556 and LAMC Section 11.5.6, a **General Plan Amendment** from Low Residential to Neighborhood Commercial.
- Pursuant to LAMC Section 12.32 F, a **Zone Change** from [Q]R1-1D and [Q]R1-1D-HPOZ to [Q]C2-1D-HPOZ.
- 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, building permits, and sign permits.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Except as provided in Public Resources Code Section 21099 would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

No Impact. A significant impact would occur if the proposed project would have a substantial adverse effect on a scenic vista. A scenic vista refers to views of focal points or panoramic views of broader geographic areas that have visual interest. A focal point view would consist of a view of a notable object, building, or setting. An impact on a scenic vista would occur if the bulk or design of a building or development contrasts enough with a visually interesting view, so that the quality of the view is permanently affected. The project site is located 2.5 miles northeast of Downtown Los Angeles, approximately 0.75 miles east of the Golden State (I-5) Freeway and 1.25 miles north of the San Bernardino (I-10) Freeway. The project site is also located

approximately 0.95 miles away from the Lincoln/Cypress Station of the Metro Gold Line. The subject site has three street frontages: Thomas Street, Altura Street, and Gates Street. The subject site is surrounded on the north, east, and west by a mix of one- to two-story single and multi-family dwellings. There is an adjacent commercial strip mall (currently under construction) located south of the project site. To the east is the Lincoln Senior High School and Pueblo High School. To the south is also the Gates Street elementary School. The North Broadway corridor is designated for, and consists of neighborhood commercial uses, and serves as the connector to Downtown Los Angeles. The proposed project is a change of use from a former private primary school, daycare and convent/chapel to a professional/business office. The proposed project also includes the potential development of an additional 10,000 square feet of office use on portions of the project site that are outside the current HPOZ boundaries. No demolition and no grading is proposed at this time. Due to existing topography and urban development, views from within the vicinity of the Project Sites are limited to short- and mid-range views of existing structures; no scenic vistas are present from and/or near the Project Sites. Therefore, the project will not have an adverse effect on a scenic vista.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

No Impact. A significant impact would occur if the proposed project would substantially damage scenic resources within a State Scenic Highway. The City of Los Angeles' General Plan Mobility Element (Citywide General Plan Circulation System Maps) as well as the CalTrans website at http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/langeles.htm indicates that no State-designated scenic highways are located near the project site. Therefore, no impacts related to a State scenic highways would occur.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. A significant impact would occur if the proposed project would substantially degrade the existing visual character or quality of the site and its surroundings. The surrounding project area is developed with a mix of one- to two-story single and multi-family dwellings. There is an adjacent commercial strip mall (currently under construction) located south of the project site. To the east is the Lincoln Senior High School and Pueblo High School. To the south is also the Gates Street elementary School. In addition, potential for degradation to the visual character and quality of the site and surrounding area would be further reduced with the following applicable Regulatory Compliance Measures (RCM), RC-AE-3 which, pursuant to Los Angeles Municipal Code Section 91.8104, requires that every building shall be maintained in a safe and sanitary condition and good repair, and free from debris, rubbish, garbage, trash, overgrown vegetation, or other similar material; and LAMC Section 91.8014.15, which requires that the exterior to all building and fences shall be free from graffiti when such graffiti is visible from a street or alley. Therefore, through the implementation of the above regulations and RCM, impacts to the existing visual character or quality of the site and its surroundings would be less than significant. Refer to Response to Checklist Question I (a) above.

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

Less Than Significant Impact. A significant impact would occur if light and glare substantially altered the character of off-site areas surrounding the site or interfered with the performance of an off-site activity. Light impacts are typically associated with the use of artificial light during the evening and night-time hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions. Due to the urbanized nature of the area, a moderate level of ambient nighttime light already exists. Nighttime lighting sources include street lights, vehicle headlights, and interior and exterior building illumination. The proposed project could include nighttime security lighting primarily along the perimeter of the project site. However, the security lighting would be night-friendly LEDs and would not substantially change existing ambient nighttime lighting conditions. The proposed project does not include any elements or features that would create substantial new sources of glare. Therefore, light and glare impacts would be less than significant. Refer to Response to Checklist Question I (a) above.

II. AGRICULTURE AND FORESTRY RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. A significant impact would occur if the proposed project would convert valued farmland to non-agricultural uses. The project site consists of 11 lots containing a school, daycare, convent, dormitories, playground, chapel, and surface parking area. No Farmland, agricultural uses, or related operations are present within the project site or surrounding area. Due to its urban setting, the project site and surrounding area are not included in the Farmland Mapping and Monitoring Program of the California Resources Agency. In addition, the proposed project would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. Therefore, no impact would occur.

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

No Impact. A significant impact would occur if the proposed project conflicted with existing agricultural zoning or agricultural parcels enrolled under the Williamson Act. The project site is not zoned for agricultural use or under a Williamson Contract. As the project site and surrounding area do not contain farmland of any type, the proposed project would not conflict with a Williamson Contract. Therefore, no impact would occur.

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. A significant impact would occur if the proposed project conflicted with existing zoning or caused rezoning of forest land or timberland, or resulted in the loss of forest land or in the conversion of forest land to non-forest use. The project site and the surrounding area are not zoned for forest land or timberland. Accordingly, the proposed project would not conflict with forest land or timberland zoning or result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact would occur.

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

No Impact. A significant impact would occur if the proposed project conflicted with existing zoning or caused rezoning of forest land or timberland, or resulted in the loss of forest land or in the conversion of forest land to non-forest use. The project site and the surrounding area are not zoned for forest land or timberland. Accordingly, the proposed project would not conflict with forest land or timberland zoning or result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact would occur.

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?

No Impact. A significant impact would occur if the proposed project caused the conversion of farmland to non-agricultural use. The project site does not contain farmland, forestland, or timberland. Therefore, no impact would occur.

III. AIR QUALITY

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Conflict with or obstruct implementation of the applicable air quality plan?

No Impact. The South Coast Air Quality Management District (SCAQMD) is the agency primarily responsible for comprehensive air pollution control in the South Coast Air Basin and reducing emissions from area and point stationary, mobile, and indirect sources. SCAQMD prepared the 2016 Air Quality Management Plan (AQMP) to meet federal and state ambient air quality standards. A significant air quality impact may occur if a project is inconsistent with the AQMP or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The proposed project is not expected to conflict with or obstruct the implementation of the AQMP and SCAQMD rules. The proposed project is also subject to the City’s Green Building Program Ordinance (Ord. No. 179,890), which was adopted to reduce the use of natural resources, create healthier living environments, and minimize the negative impacts of development on local, regional and global ecosystems. Therefore, no impact would occur.

b) 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?

Less than Significant Impact. A significant impact would occur if the proposed project would violate any air quality standard or contribute substantially to an existing or projected air quality violation. At this time, there is no demolition, construction, or grading proposed as part of the proposed project, solely a change of use with minor interior and exterior alterations of existing buildings. However, the proposed project also includes a future potential development of 10, 000 square feet. The proposed project would not exceed the regional SCAQMD significance thresholds for emissions of Carbon Monoxide (CO), Reactive Organic Compounds (ROG), Nitrogen Oxides (NOx), Particulate Matter (PM10 and PM2.5), and Sulfur Dioxide (SOx). Motor vehicles that access the project site would be the predominant source of long-term project operations emissions. Additional emissions would be generated by area sources, such as energy use and landscape maintenance activities. The project would be subject to regulatory compliance measures, which reduce the impacts of operational and construction regional emissions. As such, the proposed project would result in a less than significant impact.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, childcare centers, and athletic facilities. The subject site is surrounded on the north, east, and west by a mix of one- to two-story single and multi-family dwellings. There is an adjacent commercial strip mall located south of the project site. To the east is the Lincoln Senior High School and Pueblo High School. To the south is also the Gates Street elementary School. The SCAQMD has developed localized significance thresholds (LSTs) that are based on the amount of maximum daily-localized construction emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These apply to projects that are less than or equal to five acres in size and are only applicable to Repairable Particulate Matter (PM10 and PM2.5), Carbon Monoxide (CO), and Nitrogen Oxides (NOx). The California Air Resources Board (CARB) has published guidance for locating new sensitive receptors (e.g., residences) away from nearby sources of air pollution. Relevant recommendations include avoiding siting new sensitive land uses within 500 feet of a freeway or 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). The location of the proposed project would be consistent with the CARB recommendations for locating new sensitive receptors. Therefore, the proposed project would result in a less than significant impact.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

No Impact. Potential sources that may emit odors during construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the immediate area surrounding the project site. At this time, there is no demolition, construction, or grading proposed as part of the proposed project, solely a change of use with minor interior and exterior alterations of existing buildings. However, the proposed project also includes a future potential development of 10, 000 square feet. Therefore, any potential odors created through typical construction techniques would be temporary in nature, if any at all. There would be no construction odor nuisances either. According to the SCAQMD CEQA Air Quality Handbook, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The proposed land uses would not result in activities that create objectionable odors. Therefore, the proposed project would not result in an impact related to objectionable odors.

IV. BIOLOGICAL RESOURCES

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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?

No Impact. A project would have a significant biological impact through the loss or destruction of individuals of a species or through the degradation of sensitive habitat. The project site is located in a highly urbanized area, just north of North Broadway, a commercial corridor in the Lincoln Heights neighborhood. At this time, there is no demolition, construction, or grading proposed as part of the proposed project, solely a change of use with minor interior and exterior alterations of existing buildings. However, the proposed project also includes a future potential development of 10,000 square feet. There are three (3) existing palm trees and no trees within the public right-of-way proposed to be removed. The existing palm trees proposed for removal are not Protected Trees pursuant to the Protected Tree Ordinance (No. 186,873). Nesting birds are protected under the Federal Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code. Thus, the project applicant shall comply with the regulatory compliance measures to ensure that no significant impacts to nesting birds or sensitive biological species or habitat would occur. Therefore, no impact would occur.

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

No Impact. A significant impact would occur if any riparian habitat or natural community would be lost or destroyed as a result of urban development. The project site does not contain any riparian habitat and does not contain any streams or water courses necessary to support riparian habitat. Therefore, the proposed project would not have any effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife (CDFW) or the United States Fish and Wildlife Services (USFWS), and no impacts would occur.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. A significant impact would occur if federally protected wetlands would be modified or removed by a project. The project site does not contain any federally protected wetlands, wetland resources, or other waters of the United States as defined by Section 404 of the Clean Water Act. The project site is located in a highly urbanized area and developed in an area surrounded by residential, commercial, and institutional uses. Therefore, the proposed project would not have any 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, and no impacts would occur.

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?

No Impact. A significant impact would occur if the proposed project would interfere with, or remove access to, a migratory wildlife corridor or impede use of native wildlife nursery sites. Due to the highly urbanized nature of the project site and surrounding area, the lack of a major water body, and the limited number of trees, the project site does not support habitat for native resident or migratory species or contain native nurseries. Therefore, the proposed project would not interfere with wildlife movement or impede the use of native wildlife nursery sites, and no impact would occur

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

No Impact. A significant impact would occur if the proposed project would be inconsistent with local regulations pertaining to biological resources. The proposed project would not conflict with any policies or ordinances protecting biological resources, such as the City of Los Angeles Protected Tree Ordinance (No. 177,404). At this time, there is no demolition, construction, or grading proposed as part of the proposed project, solely a change of use with minor interior and exterior alterations of existing buildings. However, the proposed project also includes a future potential development of 10, 000 square feet. There are three (3) existing palm trees and no trees within the public right-of-way proposed to be removed. The existing palm trees proposed for removal are not Protected Trees pursuant to the Protected Tree Ordinance (No. 186,873). The tree removals will be required to comply with the provisions of the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFGC). Both the MBTA and CDFW protects migratory birds that may use trees on or adjacent to the project site for nesting and may be disturbed during construction of the proposed project. Therefore, the proposed project would not 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), and no impacts would occur.

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 and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. The project site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, the proposed project would not conflict with the provisions of any adopted conservation plan, and no impacts would occur.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less than Significant Impact. A significant impact would occur if the proposed project would cause a substantial adverse change in the significance of an identified historical resource. Six of the 11 lots that compose the project site are included within the boundaries of the Lincoln Heights HPOZ. Any future exterior alterations or additions/new construction on this portion of the Project Site would be subject to the HPOZ Ordinance (LAMC 12.20.3) and procedures. Additionally, prior to demolition of any buildings on the site identified in the original Historic Resource Survey for the Lincoln Heights Historic Preservation Overlay Zone (HPOZ), the property owner shall comply with the demolition requirements of the HPOZ Ordinance (LAMC Section 12.20.3) for contributing buildings, even if the buildings are not located within the current boundaries of the Lincoln Heights HPOZ. The Project will not cause a substantial adverse change to the significance of a historical resource, including the Lincoln Heights HPOZ, and therefore, impacts to a historical resource would be less than significant.

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

Less than Significant Impact. A significant impact would occur if a known or unknown archaeological resource would be removed, altered, or destroyed as a result of the proposed development. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources or resources that constitute unique archaeological resources. A project-related significant impact could occur if a project would significantly affect archaeological resources that fall under either of these categories. If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in

accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Per regulatory compliance measures, personnel of the proposed project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the project site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Therefore, impacts would be less than significant.

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

Less than Significant Impact. A significant impact would occur if previously interred human remains would be disturbed during excavation of the project site. Human remains could be encountered during excavation and grading activities associated with the proposed project. While no formal cemeteries, other places of human interment, or burial grounds or sites are known to occur within the project area, there is always a possibility that human remains can be encountered during construction. If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. If human remains of Native American origin are discovered during project construction, compliance with state laws, which fall within the jurisdiction of the Native American Heritage Commission (NAHC) (Public Resource Code Section 5097), relating to the disposition of Native American burials will be adhered to. Therefore, impacts would be less than significant.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact. A significant impact would occur if the project would substantially increase demand for energy resources, which exceeds the available supply.

Short-Term Construction Impacts

At this time, there is no demolition, construction, or grading proposed as part of the proposed project, solely a change of use with minor interior and exterior alterations of existing buildings. However, the proposed project also includes a future potential development of 10, 000 square feet. Any future development may increase demand for energy resources, however, not to an extent that would exceed any available supply. The future potential development would be for a use that is allowed within the zone and therefore, would not substantially increase a demand for energy resources.

Long-Term Operational Impacts

The proposed project would require electricity, natural gas, and petroleum during operations. For the reasons discussed below, the proposed project does not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources.

Electricity

The Los Angeles Department of Water and Power (LADWP) provides electrical service throughout the City of Los Angeles and many areas of the Owens Valley, serving approximately 4 million people within a service area of approximately 465 square miles, excluding the Owens Valley.

Electrical service provided by the LADWP is divided into two planning districts: Valley and Metropolitan. The Valley Planning District includes the LADWP service area north of Mulholland Drive, and the Metropolitan Planning District includes the LADWP service area south of Mulholland Drive. The Project site is located within LADWP's Metropolitan Planning District. According to LADWP's 2017 Power Strategic Long-Term Resource Plan, the LADWP has a generation capacity greater than 7,880 MW. In 2017, the LADWP power system experienced an instantaneous peak demand of 6,502 MW (LADWP 2017). Approximately 29 percent of LADWP's 2016 electricity purchases were from renewable sources, which is similar to the 25 percent statewide percentage of electricity purchases from renewable sources (CEC 2018).

Upon completion, the project's operational phase would require electricity for building operation (appliances, lighting, etc.). The project would also be required to comply with the 2016 Title 24 standards or the most recent standards at the time of building issuance. The energy-using fixtures within the project would likely be newer technologies, utilizing less electricity power. In addition, LADWP is required to procure at least 33 percent of their energy portfolio from renewable sources by 2020. The current sources procured by LADWP include wind, solar, and geothermal sources. These sources account for 29 percent of LADWP's overall energy mix in 2016, the most recent year for which data are available (CEC 2018). Therefore, the project would not result in a wasteful use of electricity. Therefore, impacts would be less than significant.

Natural Gas

Natural gas is provided to the project site by the Southern California Gas Company (SoCal Gas). SoCal Gas is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCal Gas serves approximately 21.8 million customers in more than 500 communities encompassing approximately 24,000 square miles throughout Central and Southern California, from the City of Visalia to the Mexican border (SoCalGas 2018). The traditional, southwestern United States sources of natural gas will continue to supply most of SoCal Gas' natural gas demand. The Rocky Mountain supply is available but is used as an alternative supplementary supply source, and the use of Canadian sources provide only a small share of SoCal Gas supplies due to the high cost of transport (California Gas and Electric Utilities 2018). Additionally, the California Public Utilities Commission (CPUC) regulates California natural gas rates and natural gas services, including in-state transportation over transmission and distribution pipeline systems, storage, procurement, metering, and billing. Most of the natural gas used in California comes from out-of-state natural gas basins (CPUC 2017).

Although the project would require natural gas for building heating, the project would comply with 2016 Title 24 building energy efficiency standards, reducing energy used in the state. Based on compliance with Title 24 and CPUC regulations, therefore, natural gas consumption impacts would be less than significant.

Petroleum

According to the California Energy Commission (CEC), transportation accounts for 38.5% of California's total energy consumption in 2015 (CEC 2018). In 2017, California consumed 15.6 billion gallons of gasoline and 2.82 billion gallons of diesel fuel (California Board of Equalization 2018). However, the State is now working on developing flexible strategies to reduce petroleum use. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce Vehicle Miles Traveled (VMT). Accordingly, gasoline consumption in California has declined. The CEC predicts that the demand for gasoline will continue to decline over the next 10 years, and there will be an increase in the use of alternative fuels (CEC 2016).

During operation of the project, the majority of fuel consumption would involve the use of motor vehicles traveling to and from the Project site. Over the lifetime of the Project, the fuel efficiency of vehicles being used by residents is expected to increase. As such, the amount of petroleum consumed as a result of vehicle trips to and from the Project site is expected to decrease during the lifetime of the Project. In addition, as discussed in more detail in Section 17, Transportation, the Project would not result in a substantial VMT, and thus, would not result in the inefficient or wasteful use of petroleum. Therefore, impacts would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. The project would be designed to comply with all applicable state and local codes, including the City's Green Building Ordinance and the California Green Building Standards Code. Design features that could be implemented would include, but not be limited to, use of efficient lighting technology; energy efficient heating, ventilation and cooling equipment; and Energy Star rated products and appliances.

Overall, the project would be designed and constructed in accordance with applicable state and local green building standards that would serve to reduce the energy demand of the project. In addition, based on the above, the project's energy demand would be within the existing and planned electricity and natural gas capacities of LADWP and SoCalGas, respectively. Use of petroleum-based fuels during construction and operation would also be minimized. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and no impact would occur.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Directly or indirectly cause 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. A significant impact would occur if the proposed project would cause personal injury or death or result in property damage as a result of a fault rupture occurring on the project site and if the project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. The subject site is not within an Alquist-Priolo Earthquake Fault Zone or other designated fault zone. The nearest Active Fault Near-Source Zone, Upper Elysian Park, is located approximately 0.5 km from the project site. Thus, the potential for fault rupture at the project site would be considered low. At this time, there is no demolition, construction, or grading proposed as part of the proposed project, solely a change of use with minor interior and exterior alterations of existing buildings. However, the proposed project also includes a future potential development of 10, 000 square feet. The proposed use is an allowed use under the proposed new zone and no proposed uses would have the potential to directly or indirectly exacerbate existing potential for fault rupture. Therefore, impacts would be less than significant.

ii) Strong seismic ground shaking?

Less than Significant Impact. A significant impact would occur if the proposed project would cause personal injury or death or resulted in property damage as a result of seismic ground shaking. The entire Southern California region is susceptible to strong ground shaking from severe earthquakes. Consequently, development of the proposed project could expose people and structures to strong seismic ground shaking. However, the proposed project would be designed in accordance with State and local Building Codes to reduce the potential for exposure of people or structures to seismic risks to the maximum extent possible. The proposed project would be required to comply with the California Department of Conservation, Division of Mines and Geology (CDMG), which provides guidance for the evaluation and mitigation of earthquake-related hazards, and with the seismic safety requirements in the Uniform Building Code (UBC) and the LAMC. Compliance with such requirements would reduce seismic ground shaking impacts to the maximum extent practicable with current engineering practices. Therefore, impacts related to strong seismic ground shaking would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact. A significant impact may occur if a proposed project site is located within a liquefaction zone. Liquefaction is the loss of soil strength or stiffness due to a buildup of pore-water pressure during severe ground shaking. While the subject site is not located within a Liquefaction Zone, specific RCMs in the City of Los Angeles regulate the grading and construction of projects in these particular types of locations and will reduce any potential impacts to less than significant. RCMs include the Uniform Building Code Chapter 18, Division 1, Section 1804.5: Liquefaction Potential and Soil Strength Loss. These RCMs have been historically proven to work to the satisfaction of the City Engineer to reduce any impacts from the specific environment the project is located. Therefore, impacts related to

seismic-related ground failure, including liquefaction, would be less than significant.

iv) Landslides?

No Impact. A significant impact would occur if the proposed project would be implemented on a site that would be located in a hillside area with unstable geological conditions or soil types that would be susceptible to failure when saturated. According to the California Department of Conservation, Division of Mines and Geology, the Seismic Hazard Zones Map for this area shows the project site is not located within a landslide hazard zone. The project site and surrounding area are relatively flat, except for the northern edge of the site. Therefore, the proposed project would not expose people or structures to potential effects resulting from landslides, and no impacts would occur.

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

No Impact. A significant impact would occur if construction activities or future uses would result in substantial soil erosion or loss of topsoil. At this time, there is no demolition, construction, or grading proposed as part of the proposed project, solely a change of use with minor interior and exterior alterations of existing buildings. However, the proposed project also includes a future potential development of 10, 000 square feet which may require minimal grading activity in the future. Any construction activities would be performed in accordance with the requirements of the Los Angeles Building Code and the Los Angeles Regional Water Quality Control Board (LARWQCB) through the City's Stormwater Management Division. In addition, the proposed project would be required to develop a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would require implementation of an erosion control plan to reduce the potential for wind or waterborne erosion during the construction process. In addition, all onsite grading and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC. Therefore, since there is no demolition and minimal potential future construction proposed as part of the project, there would be no impact with respect to erosion or 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?

Less than Significant Impact. A significant impact would occur if any unstable geological conditions would result in any type of geological failure, including lateral spreading, off-site landslides, liquefaction, or collapse. Development of the proposed project would not have the potential to expose people and structures to seismic-related ground failure, including liquefaction and landslide; see Response to Checklist Question VII a-b for these issues. Subsidence and ground collapse generally occur in areas with active groundwater withdrawal or petroleum production. The extraction of groundwater or petroleum from sedimentary source rocks can cause the permanent collapse of the pore space previously occupied by the removed fluid. According to the Safety Element of the City of Los Angeles General Plan Safety Element of the Los Angeles City General Plan, Critical Facilities and Lifeline Systems, Exhibit E and/or the Environmental and Public Facilities Map (1996), the project site is not identified as being located in an oil field or within an oil drilling district. Construction will be required by the Department of Building and Safety to comply with the City of Los Angeles Uniform Building

Code (UBC), which is designed to assure safe construction and includes building foundation requirements appropriate to site conditions. Therefore, the potential for landslide lateral spreading, subsidence, liquefaction or collapse would be less than significant.

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

No Impact. A significant impact would occur if the proposed project would be built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus, posing a hazard to life and property. Expansive soils have relatively high clay mineral and expand with the addition of water and shrink when dried, which can cause damage to overlying structures. However, the proposed project would be required to comply with the requirements of the UBC, LAMC, and other applicable building codes. Compliance with such requirements would reduce impacts related to expansive soils, and impacts would be less than significant.

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

No Impact. A project would cause a significant impact if adequate wastewater disposal is not available. The project site is located in a highly urbanized area, where wastewater infrastructure is currently in place. The proposed project would connect to existing sewer lines that serve the project site and would not use septic tanks or alternative wastewater disposal systems. In a letter dated September 5, 2019, the Bureau of Sanitation reviewed the sewer/storm drains serving the subject tracts and found no potential problems. Therefore, there would be no impact.

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

Less than Significant Impact. A significant impact would occur if excavation or construction activities associated with the proposed project would disturb paleontological or unique geological features. If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Therefore, impacts would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less than Significant Impact. Greenhouse gases (GHG) are those gaseous constituents of the atmosphere, both natural and human generated, that absorb and emit radiation at specific wavelengths within the spectrum of terrestrial radiation emitted by the earth's surface, the atmosphere itself, and by clouds. The City has adopted the LA Green Plan to provide a citywide plan for achieving the City's GHG emissions targets, for both existing and future generation of GHG emissions. In order to implement the goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current Los Angeles Green Building Code (LAGBC) (Ordinance No. 181,480). The LAGBC requires projects to achieve a 20 percent reduction in potable water use and wastewater generation. Through required implementation of the LAGBC, the proposed project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs. Therefore, the proposed project's generation of GHG emissions would not make a cumulatively considerable contribution to emissions and impacts would be less than significant.

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

Less than Significant Impact. A significant impact would occur if the proposed project conflicted with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases (GHG). The California legislature passed Senate Bill (SB) 375 to connect regional transportation planning to land use decisions made at a local level. SB 375 requires the metropolitan planning organizations to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plans to achieve the per capita GHG reduction targets. For the SCAG region, the SCS is contained in the 2016-2040 Regional Transportation Plan/Sustainable

Communities Strategy (RTP/SCS). The 2016-2040 RTP/SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas on existing main streets, in downtowns, and commercial corridors, resulting in more opportunity for transit-oriented development. In addition, SB 743, adopted September 27, 2013, encourages land use and transportation planning decisions that reduce vehicle miles traveled, which contribute to GHG emissions, as required by AB 32. The project would provide infill development proximate to a major transportation corridor (i.e., Pico Boulevard) and would not interfere with SCAG's ability to implement the regional strategies outlined in the 2016-2040 RTP/SCS. The proposed project, therefore, would be consistent with statewide, regional and local goals and policies aimed at reducing GHG emissions and would result in a less than significant impact related to plans that target the reduction of GHG emissions.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less than Significant Impact. A significant impact would occur if the proposed project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. At this time, there is no demolition, construction, or grading proposed as part of the proposed project, solely a change of use with minor interior and exterior alterations of existing buildings. However, the proposed project also includes a future potential development of 10, 000 square feet. Any potential future construction activities associated with the project would use a limited amount of hazardous materials during the operation of heavy equipment operation for things like grading and excavation. Any potential use of hazardous chemicals would be limited and would have to chow compliance with existing local and state regulations. Additionally, the proposed change of use to office and those uses related to office do not typically involve the transport, use or disposal of hazardous materials. Operation of the project would involve the limited use and storage of common hazardous substances typical of those used in office developments, including lubricants, paints, solvents, custodial products (e.g., cleaning supplies), pesticides and other landscaping supplies, and vehicle fuels, oils, and transmission fluids. No uses or activities are proposed that would result in the use or discharge of unregulated hazardous materials and/or substances, or create a public hazard through transport, use, or disposal. Significant hazards are not anticipated as long as residents and maintenance staff store, use, and dispose of hazardous materials in accordance with manufacturers' instructions and handle in compliance with applicable federal, State, and local regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. Thus, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, impacts would be less than significant.

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?

Less than Significant Impact. A significant impact would occur if the proposed project created a significant hazard to the public or environment due to a reasonably foreseeable release of hazardous materials. The existing structures on the project site were built in 1941, 1947, and 1954, and may contain asbestos-containing materials (ACMs) and lead-based paint (LBP). Although no demolition of these buildings is proposed, demolition of these buildings would have the potential to release asbestos fibers into the atmosphere if such materials exist and they are not properly stabilized or removed prior to demolition activities. The removal of asbestos is regulated by SCAQMD Rule 1403; therefore, any asbestos found on-site would be required to be removed in accordance with applicable regulations prior to demolition. Similarly, it is likely that lead-based paint is present in buildings constructed prior to 1979. Compliance with existing State laws regarding removal would be required, resulting in a less than significant impact.

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. Construction activities have the potential to result in the release, emission, handling, and disposal of hazardous materials within one-quarter mile of an existing school. There is one existing school located within one-quarter mile of the project site. Within 0.2

miles of the project site is the Pueblo High School. Additionally, there are two other schools located 0.3 miles from the project site (Abraham Lincoln Senior High School and Gates Street Elementary School). The proposed project is change of use from a former private primary school, daycare and convent/chapel to a professional/business office. The project requests approval of a potential phased development of 10,000 square feet of office floor area. No demolition is proposed and no grading is proposed at this time. Operation of the project would involve the limited use and storage of common hazardous substances typical of those used in office developments, including lubricants, paints, solvents, custodial products (e.g., cleaning supplies), pesticides and other landscaping supplies, and vehicle fuels, oils, and transmission fluids. All hazardous materials within the project site would be acquired, handled, used, stored, transported, and disposed of in accordance with all applicable federal, State, and local requirements. With this compliance, the proposed project would result in a less than significant impact.

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?

No Impact. A significant impact would occur if the project site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would create a significant hazard to the public or the environment. The California Department of Toxic Substances Control (DTSC) maintains a database (EnviroStor) that provides access to detailed information on hazardous waste permitted sites and corrective action facilities, as well as existing site cleanup information. EnviroStor also provides information on investigation, cleanup, permitting, and/or corrective actions that are planned, being conducted, or have been completed under DTSC's oversight. A review of EnviroStor on July 10, 2020, did not identify any records of hazardous waste facilities on the project site. Therefore, the proposed project would not be located on a site that is included on a list of hazardous materials sites or create a significant hazard to the public or the environment, and no impact would occur.

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 or excessive noise for people residing or working in the project area?

No Impact. A significant impact may occur if a project is located within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard. The project site is not located in an airport land use plan area, or within two miles of any public or public use airports, or private airstrips. Therefore, the proposed project would not result in a safety hazard for people residing or working in the project area, and no impacts would occur.

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

No Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. The nearest emergency route is North Broadway, which is approximately 150 feet to the south of the project site (City of Los Angeles, Safety Element of the Los Angeles City General Plan, Critical Facilities

and Lifeline Systems, Exhibit H, November 1996). The proposed project would not require the closure of any public or private streets and would not impede emergency vehicle access to the project site or surrounding area. Additionally, emergency access to and from the project site would be provided in accordance with requirements of the Los Angeles Fire Department (LAFD). Therefore, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and no impact would occur.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. A significant impact would occur if the proposed project exposed people and structures to high risk of wildfire. The project site is located in a highly urbanized area of the City and the area surrounding the project site is completely developed. The project site is located within a Very High Fire Hazard Severity Zone, but is not located within a wildland fire hazard area. The project, however, proposes change of use from a former private primary school, daycare and convent/chapel to a professional/business office. The project also requests approval of a potential phased development of 10,000 square feet of office floor area. No demolition and no grading is proposed at this time. Therefore, the project would not directly or indirectly expose people or structures to a significant risk of loss, injury, death as a result of exposure to wildland fires. As such, impacts related to wildland fires would be less than significant.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. Result in substantial erosion or siltation on- or off-site;				
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;				
iii. 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; or				
iv. Impede or redirect flood flows?				
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than Significant Impact. A significant impact would occur if the proposed project discharges water that does not meet the quality standards of agencies which regulate surface water quality and water discharge into storm water drainage systems, or does not comply with all applicable regulations as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB). Stormwater runoff from the proposed project has the potential to introduce small amounts of pollutants into the stormwater system. Pollutants would be associated with runoff from landscaped areas (pesticides and fertilizers) and paved surfaces (ordinary household cleaners). Thus, the proposed project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) standards and the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the project site are minimized for downstream receiving waters. The ordinances contain requirements for construction activities and operation of projects to integrate low impact development practices and standards for stormwater pollution mitigation, and maximize open, green and pervious space on all projects consistent with the City's landscape ordinance and other related requirements in the City's Development Best Management Practices (BMPs) Handbook. Conformance would be ensured during the City's building plan review and approval process. Therefore, the proposed project would result in less than significant impacts.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less than Significant Impact. A significant impact would occur if the proposed project would substantially deplete groundwater or interferes with groundwater recharge. The proposed project would not require the use of groundwater at the project site. Potable water would be supplied by the Los Angeles Department of Water and Power (LADWP), which draws its water supplies from distant sources for which it conducts its own assessment and mitigation of potential environmental impacts. Given the project does not propose subterranean levels, excavation to accommodate subterranean levels is not proposed at a depth that would result in the interception of existing aquifers or penetration of the existing water table. Therefore, the project would not require direct additions or withdrawals of groundwater. Therefore, the impact on groundwater supplies or groundwater recharge would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;

Less than Significant Impact. A significant impact would occur if the proposed project would substantially alter the drainage pattern of an existing stream or river such that flooding would result. There are no streams or rivers located in the project vicinity. During project operation, storm water or any runoff irrigation waters would be directed into existing storm drains that are currently receiving surface water runoff under existing conditions.

Impermeable surfaces resulting from the development of the project would not substantially change the volume of stormwater runoff in a manner that would result in flooding on- or off-site. Accordingly, significant alterations to existing drainage patterns within the site and surrounding area would not occur. The existing site is improved with impermeable surface. As such, the new development would not substantially change existing drainage patterns. Therefore, the proposed project would result in less than significant impacts related to the alteration of drainage patterns and on- or off-site flooding.

ii. 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. A significant impact would occur if the proposed project would substantially alter the drainage pattern of an existing stream or river such that flooding would result. There are no streams or rivers located in the project vicinity. During project operation, storm water or any runoff irrigation waters would be directed into existing storm drains that are currently receiving surface water runoff under existing conditions. Impermeable surfaces resulting from the project would not substantially change the volume of stormwater runoff in a manner that would result in flooding on- or off-site. Accordingly, significant alterations to existing drainage patterns within the site and surrounding area would not occur. As such, the change of use of existing buildings and the potential new development would not substantially change existing drainage patterns. Therefore, the proposed project would result in less than significant impacts related to the alteration of drainage patterns and on- or off-site flooding.

iii. 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; or

Less than Significant Impact. A significant impact would occur if runoff water would exceed the capacity of existing or planned storm drain systems serving the project site, or if the proposed project would substantially increase the probability that polluted runoff would reach the storm drain system. Site-generated surface water runoff would continue to flow to the City's storm drain system. Any project that creates, adds, or replaces 500 square feet of impervious surface must comply with the Low impact Development (LID) Ordinance or alternatively, the City's Standard Urban Stormwater Mitigation Plan (SUSMP), as an LAMC requirement to address water runoff and storm water pollution. As such, the change of use of existing buildings and the potential new development would not substantially change existing drainage patterns. Therefore, the proposed project would result in less than significant impacts related to existing storm drain capacities or water quality.

iv. Impede or redirect flood flows?

No Impact. A significant impact would occur if the proposed project would be located within a 100-year or 500-year floodplain or would impede or redirect flood flows. According to the Safety Element of the City of Los Angeles General Plan Safety Element of the Los Angeles City General Plan, Critical Facilities and Lifeline Systems, Exhibit F and NavigateLA, the project site is not located within a 100-year or 500-year floodplain. Therefore, the proposed project would not be located in such areas, and no impact related to flood zones would occur.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. A significant impact would occur if the proposed project would be located within an area susceptible to inundation by seiche, tsunami, or mudflow. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, or lake. A tsunami is a great sea wave produced by a significant undersea disturbance. Mudflows result from the down slope movement of soil and/or rock under the influence of gravity. The project site and the surrounding areas are not located near a water body to be inundated by seiche. Similarly, the project site and the surrounding areas are located approximately 13 miles east of the Pacific Ocean. Therefore, the project would have no impact related to inundation by seiche, tsunami, or mudflow.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. Potential pollutants generated by the project would be typical of commercial land uses and may include sediment, nutrients, pesticides, pathogens, trash and debris, oil, grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Implementation of the LID measures on the project site would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the project would not conflict with or obstruct any water quality control plans for the Los Angeles River. With compliance with existing regulatory requirements and implementation of LID BMPs, the project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Physically divide an established community?

Less than Significant Impact. A significant impact would occur if the proposed project would be sufficiently large or configured in such a way so as to create a physical barrier within an established community. A physical division of an established community is caused by an impediment to through travel or a physical barrier, such as a new freeway with limited access between neighborhoods on either side of the freeway, or major street closures. The proposed project would not involve any street vacation or closure or result in development of new thoroughfares or highways. The proposed project is a change of use from a former private primary school, daycare and convent/chapel to a professional/business office. The project requests approval of a potential future development of 10,000 square feet of office floor area. No demolition and no grading is proposed at this time. The site is in an urbanized area in Los Angeles. It would not divide an established community. Therefore, the impact would be less than significant.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the project site, and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. The site is located within the Northeast Los Angeles Community Plan Area. The site is zoned [Q]R1-1D and [Q]R1-1D-HPOZ, with a General Plan land use designation of Low Residential. The proposed project is a change of use from a former private primary school, daycare and convent/chapel to a professional/business office. The project requests approval of a potential future development of 10,000 square feet of office floor area. No demolition and no grading is proposed at this time. All existing structures will remain. Therefore, the impact would be less than significant.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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. A significant impact would occur if the proposed project would result in the loss of availability of known mineral resources of regional value or locally-important mineral resource recovery site. According to the Conservation Element of the City of Los Angeles General Plan, Mineral Resources, Exhibit A, the project site is not classified by the City as containing significant mineral deposits nor is it designated for mineral extraction land use. Therefore, the proposed project would not result in the loss of availability of any known, regionally- or locally-valuable mineral resource, and no impact would occur.

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. A significant impact would occur if the proposed project would result in the loss of availability of known mineral resources of regional value or locally-important mineral resource recovery site. According to the Conservation Element of the City of Los Angeles General Plan, Mineral Resources, Exhibit A, the project site is not classified by the City as containing significant mineral deposits nor is it designated for mineral extraction land use. Therefore, the proposed project would not result in the loss of availability of any known, regionally- or locally-valuable mineral resource, and no impact would occur.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant Impact. A significant impact would occur if exposure of persons to or generation of noise levels are in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise-sensitive land uses. The proposed project is a change of use from a former private primary school, daycare and convent/chapel to a professional/business office. The project requests approval of a potential future development of 10,000 square feet of office floor area. No demolition and no grading is proposed at this time. Any possible construction noise in the future may cause a temporary increase in the ambient noise levels but would be subject to the LAMC Sections 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools) and 41.40 (Noise Due to Construction, Excavation Work – When Prohibited) regarding construction hours and construction equipment noise thresholds. The potential for excessive noise would be further reduced by complying with the City of Los Angeles Noise Ordinance No. 161,574, and any subsequent ordinances which prohibits the emission of creation of noise beyond certain levels at adjacent uses unless technically infeasible. Therefore, with implementation of the referenced regulatory compliance measure and other applicable regulatory compliance measures, potentially significant impacts would be less than significant.

b) Generation of, excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact. The proposed project is a change of use from a former private primary school, daycare and convent/chapel to a professional/business office. The project requests approval of a potential future development of 10,000 square feet of office floor area. No demolition and no grading is proposed at this time. Any future development may include construction activities that generate varying degrees of vibration as well as generation of construction equipment vibrations. Unless heavy construction activities are conducted extremely close (within a few feet) to the neighboring structures, vibrations from construction activities rarely reach the levels that damage structures. Any future construction would be subject to the LAMC Sections 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools) and 41.40 (Noise Due to Construction, Excavation Work – When Prohibited) regarding construction hours and construction equipment noise thresholds. The potential for impacts related to construction vibration would be further reduced by complying with the City of Los Angeles Noise Ordinance No. 161,574, and any subsequent ordinances which prohibits the emission of creation of noise beyond certain levels at adjacent uses unless technically infeasible. Therefore, with implementation of the referenced regulatory compliance measure and other applicable regulatory compliance measures, potentially significant impacts would be less than significant.

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

No Impact. A significant impact would occur if the proposed project would expose people residing or working in the project area to excessive noise levels from a public airport or public use airport. The proposed project is not located within two miles of a public airport or public use airport. The project site is outside of the Los Angeles International Airport Land Use Plan. Accordingly, the proposed project would not expose people working or residing in the project area to excessive noise levels from a public airport or public use airport. Therefore, no impact would occur.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Less than Significant Impact. A potentially significant impact would occur if the proposed project would induce substantial population growth that would not have otherwise occurred as rapidly or in as great a magnitude. The proposed project is a change of use from a school, daycare, convent, dormitories, playground, and chapel to office. There are no residential units proposed as part of the proposed project. Therefore, there would not be a substantial anticipated population growth for the Northeast Los Angeles Community Plan area and is within the SCAG 2020 population projections for the City in their 2020-2045 Regional Transportation Plan. Operation of the proposed project would not induce substantial population growth in the project area, either directly or indirectly. The physical secondary or indirect impacts of population growth such as increased traffic or noise have been adequately lessened in other portions of this document. Therefore, the impact would be less than significant.

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

No Impact. A potentially significant impact would occur if the proposed project would displace a substantial quantity of existing residences or a substantial number of people. The proposed project is a change of use from a school, daycare, convent, dormitories, playground, chapel, and surface parking area to office. There are no existing housing units on-site. Therefore, there would be no impact on displacement.

XV. 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:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Fire protection?

Less than Significant Impact. A significant impact would occur if the Los Angeles Fire Department (LAFD) could not adequately serve the proposed project, necessitating a new or physically altered station. The project site and the surrounding area are currently served by Fire Station 1, located at 2230 Pasadena Avenue (approximately one mile west of the project site). The proposed project is a change of use from a school, daycare, convent, dormitories, playground, and chapel to office. The project also includes a potential future development of 10,000 square feet of office use. The existing structures have been vacant for at least three years, which could increase the number of emergency calls and demand for LAFD fire and emergency services. To maintain the level of fire protection and emergency services, the LAFD may require additional fire personnel and equipment. However, given that there are existing fire stations in close proximity to the project site, it is not anticipated that there would be a need to build a new or expand an existing fire station to serve the proposed project and maintain acceptable service ratios, response times, or other performance objectives for fire protection. By analyzing data from previous years and continuously monitoring current data regarding response times, types of incidents, and call frequencies, LAFD can shift resources to meet local demands for fire protection and emergency services. The proposed project would neither create capacity or service level problems nor result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios,

response times or other performance objectives for fire protection. Therefore, the proposed project would result in a less than significant impact.

b) Police protection?

Less than Significant Impact. A significant impact would occur if the Los Angeles Police Department (LAPD) could not adequately serve the proposed project, necessitating a new or physically altered station. The proposed project is a change of use from a school, daycare, convent, dormitories, playground, and chapel to office. The project also includes a potential future development of 10,000 square feet of office use. The existing structures have been vacant for at least three years and could increase demand for police service. The project site and the surrounding area are currently served by LAPD's Hollenbeck Community Police Station, located at 2111 E. 1st Street (approximately 2 miles south of the project site). However, given that there are existing police stations in close proximity to the project site, it is not anticipated that there would be a need to build a new or expand an existing fire station to serve the proposed project and maintain acceptable service ratios, response times, or other performance objectives for fire protection. Therefore, the proposed project would result in a less than significant impact.

c) Schools?

Less than Significant Impact. A significant impact would occur if the proposed project would include substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the school district. The proposed project is a change of use from a school, daycare, convent, dormitories, playground, and chapel to office. The project also includes a potential future development of 10,000 square feet of office use. The proposed project would not result in an increase of residential units or commercial space, which would not exponentially increase enrollment at schools that serve the area. Therefore, the proposed project would result in a less than significant impact to public schools.

d) Parks?

Less than Significant Impact. A significant impact would occur if the proposed project would exceed the capacity or capability of the local park system to serve the proposed project. The City of Los Angeles Department of Recreation and Parks (RAP) is responsible for the provision, maintenance, and operation of public recreational and park facilities and services in the City. The proposed project is a change of use from a school, daycare, convent, dormitories, playground, and chapel to office. The project also includes a potential future development of 10,000 square feet of office use. The proposed project would not result in an increase of residential units. While the proposed use can have the potential to increase demand for parks and recreation facilities, the increase will not be substantial. Moreover, the project is providing approximately 36,400 square feet of open space (29,745 square feet of usable open space if the potential future development is constructed) and landscaping. This usable open space on the subject site would

help alleviate the City's existing park system. Therefore, the proposed project would not create capacity or service level problems or result in substantial physical impacts associated with the provision of new or altered parks facilities. Accordingly, the proposed project would result in a less than significant impact on park facilities.

e) Other public facilities?

Less than Significant Impact. A significant impact would occur if the proposed project would result in substantial employment or population growth that could generate a demand for other public facilities, including libraries, which exceed the capacity available to serve the project site, necessitating new or physically altered public facilities, the construction of which would cause significant environmental impacts. The proposed project would not result in an increase of residential units. While the proposed use can have the potential to increase demand for library services and resources of the Los Angeles Public Library System, the increase will not be substantial. The proposed project would not create substantial capacity or service level problems that would require the provision of new or expanded public facilities in order to maintain an acceptable level of service for libraries and other public facilities. Therefore, the proposed project would result in a less than significant impact on other public facilities.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less than Significant Impact. Refer to Response to Checklist Question XV (d) above.

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

Less than Significant Impact. Refer to Response to Checklist Question XV (d) above.

XVII. TRANSPORTATION¹

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. A significant impact may occur if the project conflicts with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The project does not exceed the threshold criteria established by the Los Angeles Department of Transportation (LADOT) for preparing a traffic study as a change of use project for 17,318 square feet of office use. The construction of 10,000 square feet of additional floor area also does not exceed the threshold for preparing a traffic study. Moreover, the City of Los Angeles Vehicle Miles Traveled (VMT) Calculator resulted in the proposed change of use of 17,318 square feet from school to office not having a net increase of VMT, according to the DOT Referral Form dated November 26, 2019. Additionally, based on the supplemental Trip Generation and VMT Sensitivity Review for 2436 Gates Street, prepared by Gibson Transportation Consulting, Inc, on November 17, 2020, an additional 19,400 square feet of office development would also result in a net zero change in trip generation. This studied amount, which is larger than the proposed 10,000 square feet of potential future development, would also be

¹ While the new VMT Transportation Thresholds have been adopted, this is in place as an option until July 1, 2020.

below the VMT screening threshold and thus a traffic study would not have been required for an additional 19,400 square feet of additional construction. Additional traffic analysis is therefore not required for the lesser 10,000 square feet of potential development. As a result, the project will not have any significant impacts to traffic. Based on LADOT traffic impact criteria, the proposed project is not expected to generate significant traffic impacts. Therefore, impacts would be less than significant.

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?

Less Than Significant Impact. A significant impact may occur if the proposed project individually or cumulatively exceeded the service standards of the Los Angeles County Metropolitan Transportation Authority (Metro) Congestion Management Program (CMP). This program was created Statewide as a result of Proposition 111 and has been implemented locally by Metro. The CMP for Los Angeles County requires that the traffic impacts of individual development projects of potential regional significance be analyzed. Specific arterial roadways and all State highways comprise the CMP system, and a total of 164 intersections are identified for monitoring throughout Los Angeles County. The local CMP requires that all CMP monitoring intersections be analyzed where a project would likely add more than 50 trips during either the a.m. or p.m. peak hours. The change of use portion of the project does not exceed the threshold criteria established by the Los Angeles Department of Transportation (LADOT) for preparing a traffic study. Moreover, the City of Los Angeles Vehicle Miles Traveled (VMT) Calculator resulted in the proposed project not having a net increase of VMT, according to the DOT Referral Form dated November 26, 2019. After this Referral Form, Gibson Transportation Consulting, Inc. prepared a Technical Memorandum: Trip Generation and VMT Sensitivity Review dated November 17, 2020, to analyze the addition of the potential phased development of 10,000 square feet. The Memorandum found that up to 19,400 square feet of building area could be added to the project site with a net-zero increase in vehicular trip generation rates and less than significant VMT without triggering additional traffic studies or mitigation measures. The project is not expected to add more than 50 trips during both the a.m. or p.m. peak hours. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. A significant impact would occur if the proposed project would substantially increase an existing hazardous design feature or introduce incompatible uses to the existing traffic pattern. The proposed project would not include unusual or hazardous design features and the proposed project is compatible with existing uses. The project proposes a land use that complements the surrounding urban development and utilizes the existing roadway network. Access to on-site parking areas is provided through two existing driveways. The one located on Gates Street serves as the properties primary entrance. The second, along Thomas Street, is for emergency access only. The project will maintain the two existing driveways which conform to the City's design standards and would provide adequate sight distance, sidewalks, and pedestrian movement controls meeting the City's requirements to protect pedestrian safety. Therefore, impacts would be less than significant.

d) Result in inadequate emergency access?

No Impact. A significant impact may occur if the project design threatened the ability of emergency vehicles to access and serve the project site or adjacent uses. The nearest emergency route is North Broadway, which is approximately 150 feet to the south of the project site (City of Los Angeles, Safety Element of the Los Angeles City General Plan, Critical Facilities and Lifeline Systems, Exhibit H, November 1996). The proposed project would not require the closure of any public or private streets and would not impede emergency vehicle access to the project site or surrounding area. Additionally, emergency access to and from the project site would be provided in accordance with requirements of the Los Angeles Fire Department (LAFD). Therefore, the proposed project would not result in inadequate emergency access, and no impact would occur.

XVIII. TRIBAL CULTURAL RESOURCES

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:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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: 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)?

Less Than Significant Impact. Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. The Tribe must respond in writing within 30 days of the City's AB 52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in and near the

project site. An informational letter was mailed to a total of 11 Tribes known to have resources in this area, on February 26, 2020, describing the project and requesting any information regarding resources that may exist on or near the project site. On March 16, 2020, one tribal response was received from the Gabrieleno Band of Mission Indians – Kizh Nation who stated that the project location was within their Ancestral Tribal Territory, therefore they requested a formal request for tribal consultation under the provisions of CEQA for the mitigation of potential impacts to tribal cultural resources. In this correspondence, the Tribe also attached a map of said territory. On June 9, 2020, the Gabrieleño Band of Mission Indians – Kizh Nation provided input that if there will be no grading proposed as part of the proposed project then a consultation was not necessary. They further indicated that if any grading was proposed in the future, the tribes should be notified.

Due to a change in the project description to include a potential development of 10,000 square feet and possible grading in the future, a second informational letter was mailed to the same 11 Tribes known to have resources in this area. The second letter was mailed on September 7, 2021, describing the project and requesting any information regarding resources that may exist on or near the project site. The City received no request for a second consultation from any of the Tribes.

Thus, in the absence of any known cultural resources, adherence to the Regulatory Compliance Measures for archeological resources, paleontological resources, and human remains would ensure impacts associated with the accidental discovery of any archaeological resources or human remains, including Native American resources would be avoided or reduced to less-than-significant levels. The required compliance would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in to PRC Section 21083.2. Therefore, impacts would be less than significant, and no mitigation measures are required.

b) 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: 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?

Less Than Significant Impact. Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. The Tribe must respond in writing within 30 days of the City's AB 52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who might have

knowledge of the religious and/or cultural significance of resources that may be in and near the project site. An informational letter was mailed to a total of 11 Tribes known to have resources in this area, on February 26, 2020, describing the project and requesting any information regarding resources that may exist on or near the project site. On March 16, 2020, one tribal response was received from the Gabrieleno Band of Mission Indians – Kizh Nation who stated that the project location was within their Ancestral Tribal Territory, therefore they requested a formal request for tribal consultation under the provisions of CEQA for the mitigation of potential impacts to tribal cultural resources. In this correspondence, the Tribe also attached a map of said territory. On June 9, 2020, the Gabrieleño Band of Mission Indians – Kizh Nation provided input that if there will be no grading proposed as part of the proposed project then a consultation was not necessary. They further indicated that if any grading was proposed in the future, the tribes should be notified.

Due to a change in the project description to include a potential development of 10,000 square feet and possible grading in the future, a second informational letter was mailed to the same 11 Tribes known to have resources in this area. The second letter was mailed on September 7, 2021, describing the project and requesting any information regarding resources that may exist on or near the project site. The City received no request for a second consultation from any of the Tribes.

Because the project site has been subject to ground disturbance activities in the past and is not known to be associated with any cultural or sacred sites, the probability for the discovery of a known site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe is considered low. Thus, in the absence of any known cultural resources, adherence to the Regulatory Compliance Measures for archeological resources, paleontological resources, and human remains would ensure impacts associated with the accidental discovery of any archaeological resources or human remains, including Native American resources would be avoided or reduced to less than significant levels. The required compliance would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in to PRC Section 21083.2. Therefore, impacts would be less than significant, and no mitigation measures are required.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact would occur if the proposed project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded. The Los Angeles Department of Water and Power (LADWP) conducts water planning based on forecast population growth. There is no increase in residential density proposed as part of the project scope. The proposed project would be consistent with Citywide growth, and, therefore, the project demand for water is not

anticipated to require new water supply entitlements and/or require the expansion of existing or construction of new water treatment facilities beyond those already considered in the LADWP 2015 Urban Water Management Plan (UWMP). Prior to any construction activities, the project applicant would be required to coordinate with the City of Los Angeles Bureau of Sanitation (BOS) to determine the exact wastewater conveyance requirements of the proposed project, and any upgrades to the wastewater lines in the vicinity of the project site that are needed to adequately serve the proposed project would be undertaken as part of the project. Therefore, the proposed project would have a less than significant impact related to water or wastewater infrastructure.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Refer to Response to Checklist Question XIX (a).

c) 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?

Refer to Response to Checklist Question XIX (a).

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. A significant impact would occur if the proposed project's solid waste generation exceeded the capacity of permitted landfills. The Los Angeles Bureau of Sanitation (BOS) and private waste management companies are responsible for the collection, disposal, and recycling of solid waste within the City, including the project site. Solid waste during the operation of the proposed project is anticipated to be collected by the BOS and private waste haulers, respectively. As the City's own landfills have all been closed and are non-operational, the destinations are private landfills. In compliance with Assembly Bill (AB) 939, the project applicant would be required to implement a Solid Waste Diversion Program and divert at least 50 percent of the solid waste generated by the project from the applicable landfill site. The proposed project would also comply with all federal, State, and local regulations related to solid waste. Therefore, the proposed project would have a less than significant impact related to solid waste.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Refer to Response to Checklist Question XIX (d).

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact (Response to Checklist Questions XX.a through XX.d). As discussed above, in Response to Checklist Question IX.f, the project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. Impacts related to the implementation of the City's emergency response plan would be less than

significant, and no mitigation measures are required. In addition, pursuant to Public Resources Code Section 21083.01(a), analysis of the impacts related to wildfire are related to the development of projects located on a site which is classified as state responsibility areas, as defined in Section 4102, and on very high fire hazard severity zones, as defined in subdivision (i) of Section 51177 of the Government Code. While the project is in a very high fire hazard severity zone, the project site is also located within an urbanized area of the Northeast Los Angeles Community Plan area and is not designated as state responsibility area as defined in Section 4102. The project is also not located within a City-designated fire buffer zone. Furthermore, as discussed in Response to Checklist Question VII.a.iv, the project site is not located in a landslide area as mapped by the state or the City of Los Angeles. As such, the project would not substantially impair an emergency response plan or emergency evacuation plan, would not expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire, would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk, or expose people or structure to significant risks, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. Therefore, no impacts would occur, and no mitigation measures are required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially 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, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Does the project have the potential to substantially 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, substantially 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?

Less Than Significant Impact. Based on the analysis in this Initial Study, the proposed project would not 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, or reduce the number or restrict the range of a rare or endangered plant or animal. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if the proposed project, in conjunction with the related projects, would result in impacts that are less than significant when viewed separately but significant when viewed together. The following projects were or are filed with the Department of City Planning within the last 10 years and within a 500-foot radius:

PROJECTS WITHIN A 500-FOOT RADIUS OF THE SUBJECT SITE			
Address	Case Number	Date Filed	Scope of Work
3303 North Broadway	ZA-2012-1879-CU-ZV-ZAD-SPR	7/13/2012	New 5-story medical office and retail building with a parking garage.
3230 East Altura Walk	ZA-2019-1932-ZAD	4/2/2019	An addition to an existing single-family dwelling.

Per the table above, there were no other projects that solely included a change of use. Therefore, the projects above along with the proposed would not result in cumulative impact related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, and utilities and service systems. Although projects may be constructed in the project vicinity, the cumulative impacts to which the proposed project would contribute would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if the proposed project has the potential to result in significant impacts, as discussed in the preceding sections. All potential impacts of the proposed project have been identified, and RCMs have been identified, where applicable, to reduce all potential impacts to less than significant levels. Upon implementation of the RCMs identified and compliance with existing regulations, the proposed project would not have the potential to result in substantial adverse impacts on human beings either directly or indirectly. Therefore, impacts would be less than significant.

5 PREPARERS AND PERSONS CONSULTED

Lead Agency

City of Los Angeles
Department of City Planning
200 North Spring Street, Room 621
Los Angeles, CA 90012
Nicole Sánchez, City Planner

Project Applicant

Josh Oreck/Christina Carter
Narrator, Inc.
2343 Valley View Drive
Los Angeles, CA 90026

Project Representative

Paul Garry
Psomas
555 South Flower Street, Suite 4300
Los Angeles, CA 90071



January 18, 2022

Applicant/Owner

Josh Oreck/Christina Carter
Narrator Inc.
2343 Valley View Drive
Los Angeles, CA 90026

Representative

Paul Garry
PSOMAS
555 South Flower Street, Unit 4300
Los Angeles, CA 90071

RE: ENV-2019-4984-ND Errata for 2417-2455 North Thomas Street and 2428-2436 North Gates Street, Northeast Los Angeles

On December 16, 2021, the Department of City Planning re-published Negative Declaration ENV-2019-4984-ND (ND) with the following project description:

The proposed project is a change of use from a school, daycare, convent, dormitories, playground, and chapel to office. The request includes a General Plan Amendment from Low Residential to Neighborhood Commercial and a Vesting Zone Change from [Q]R1-1D and [Q]R1-1D-HPOZ to [Q]C2-1D-HPOZ. The proposed project also includes the potential development of an additional 10,000 square feet of office use on portions of the project site that are outside the current HPOZ boundaries. There is no demolition and no grading proposed at this time.

The requested entitlements include a General Plan Amendment from Low Residential to Neighborhood Commercial and a Vesting Zone Change from [Q]R1-1D and [Q]R1-1D-HPOZ to [Q]C2-1D-HPOZ.

Subsequent to the publication of ENV-2019-4984-ND, but prior to its adoption, the Department of City Planning is issuing this Errata to address minor technical corrections. These corrections are not a “substantial revision” of the ND, since the changes do not affect the project’s level of environmental impact and do not change the conclusions of the ND. Below are the corrections to ENV-2019-4984-ND, since the conclusion of the public comment period. Additions are illustrated with underline and removals are illustrated with ~~strikethrough~~.

The proposed project is a change of use from a school, daycare, convent, dormitories, playground, and chapel to office. The request includes a General Plan Amendment from Low Residential to Neighborhood Commercial and a Vesting Zone Change from [Q]R1-1D and [Q]R1-1D-HPOZ to [Q]C2-1D and [Q]C2-1D-HPOZ. The proposed project also includes the potential development of an additional 10,000 square feet of office use on portions of the project site that are outside the current HPOZ boundaries. There is no demolition and no grading proposed at this time.

The requested entitlements include a General Plan Amendment from Low Residential to Neighborhood Commercial and a Vesting Zone Change from [Q]R1-1D and [Q]R1-1D-HPOZ to [Q]C2-1D and [Q]C2-1D-HPOZ.

Conclusion

Because the document was not substantially revised per CEQA Guidelines Section 15073.5 and no new mitigation measures or project revisions must be added to reduce any impacts to less than significant levels, a public circulation period is not required. The additional evidence substantiates that the project, with proposed mitigation measures, will continue to reduce potential environmental impacts to less than significant levels.

Sincerely,

Nicole Sanchez

Nicole Sánchez
City Planner
Department of City Planning



Lincoln Heights Neighborhood Council
3516 North Broadway
Los Angeles, CA 90031
FACEBOOK: "www.facebook.com/LHNCLA31"
WEB: "www.LincolnHeightsNC.org"

GILBERT AREVALO, President; BEN WADSWORTH, Vice President;
YVETTE ANCIRA-LUCIO, Secretary; MARIA PALACIO, Treasurer

EXHIBIT E

PUBLIC COMMENT
CPC-2020-4983-GPA-VZC



September 29, 2019

Nicole Sanchez, City Planner
Department of City Planning
City of Los Angeles
200 N. Spring Street, Room 621
Los Angeles, CA 90012

RE: CPC-2019-4983-GPA-ZC-ZAD
ENV-2019-4984-EAF

Dear Ms Sanchez,

The Lincoln Heights Neighborhood Council (LHNC) at its duly noticed and scheduled General Board meeting on September 19, 2019, considered on its agenda item 6.e.iii, approval for a General Plan Amendment from Low Residential to Neighborhood Commercial, a vesting zone change from a private primary school to a professional business office at this address:

2436 North Gates Street

The LHNC Board voted on the Motion/Resolution to support CPC-2019-4983-GPA-ZC-ZAD, a request pursuant to LAMC 11.5.6, Zoning Administrator Determination Request for change of land use from low residential to neighborhood commercial, and for relief from improvements on Thomas and Altura Streets for existing buildings and frontages on substandard hillside limited streets. We recognize that no new construction, demolition, grading or changes to the existing structures are proposed.

Motion passed.

Sincerely,

Richard Larsen, Chair, Planning and Land Use Committee, Lincoln Heights Neighborhood Council

BOARD MEMBERS: BUSINESS REPRESENTATIVES: William Rodriguez Morrison, Mario Marrufo, (vacant);
COMMUNITY BASED ORGANIZATIONS REPRESENTATIVES: Selena Ortega, Benny Madera, Martha Sevin Riley,
YOUTH REPRESENTATIVES: Brittney Rivera, Hugo Hernandez; AREA REPRESENTATIVES: Richard William Larsen, Theresa Vasquez,
Martin S. Gomez, Vicente Gonzalez-Reyes Jr., Armida Marrufo, Maribel Hernandez, Vince Rosiles, Michelle Rubio, Tameka Flowers, David Myers,
(vacant), Amanda Coolong, Victoria Montes, Maria Palacio.



LA Planning Alliance

Planning for and by communities

January 11, 2022

Nicole Sanchez, City Planner
Department of City Planning
City of Los Angeles
200 N. Spring Street, Room 62
Los Angeles, CA 90012

**RE: CPC-2019-4983-GPA-ZC-ZAD
ENV-2019-4984-EAF**

Dear Ms Sanchez,

I am writing in support of the proposed General Plan Amendment and Zone Change for the Narrator project located at 2436 North Gates Street. The Lincoln Heights Neighborhood Council (LHNC) at its duly noticed and scheduled General Board meeting on September 19, 2019, considered on its agenda item 6.e.iii, approval for a General Plan Amendment from Low Residential to Neighborhood Commercial, a vesting zone change from a private primary school to a professional business office at this address:

2436 North Gates Street

The LHNC Board voted and approved a Motion/Resolution to support CPC-2019-4983-GPA-ZC-ZAD, a request pursuant to LAMC 11.5.6, Zoning Administrator Determination Request for change of land use from low residential to neighborhood commercial, and for relief from improvements on Thomas and Altura Streets for existing buildings and frontages on substandard hillside limited streets.

I understand that the project now includes the potential future development of up to 10,000 square feet of one- and two-story buildings on the northeast portion of the site, that is not located within the Lincoln Heights Historic Preservation Ordinance Zone. The project is worthy and continues to have my support. I am thrilled that Narrator will be a moving their business to our community. The jobs and the catalytic impact of the use of the site for professional business offices will reverberate throughout the community.

LA Planning Alliance

2684 Lacy Street
Unit 212
Los Angeles, CA 90031

RWLarsen.LAPA@gmail.com
www.laplanningalliance.org
@LAPA

Sincerely,

A handwritten signature in black ink that reads 'Richard William Larsen'.

Richard William Larsen
LA Planning Alliance

If you would like to view the content from the event, please visit our website

www.laplanningalliance.org