



City of Los Angeles

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



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

The Alexan Project

ENV-2006-6302-MND-REC 1 (Case No. ZA-2006-6350-YV-ZAA-SPR and VTT-66505)

**THIS DOCUMENT COMPRISES THE ADDENDUM TO A PREVIOUSLY APPROVED
MITIGATED NEGATIVE DECLARATION [ENV-2006-6302-MND] AS REQUIRED
UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT**

Project Location: 840 - 856 S. Hill Street; and 217 - 225 W. 9th Street, Los Angeles 90014

Council District: 14

Project Description: In 2007, a mixed-use high-rise project containing 167 residential condominium units and 7,107 square feet of lobby/retail space within 190,902 square feet of floor area was analyzed in the adopted Mitigated Negative Declaration (ENV-2006-6302-MND). The Project granted entitlements for 158 residential condominium units and 5,780 square feet of ground floor commercial uses in case numbers ZA-2006-6350-YV-ZAA-SPR and VTT-66505 (“Approved Project”). The Approved Project would achieve a maximum height of 246 feet, or 21-stories with 2 subterranean parking levels. A total of 245 parking spaces were approved, with no bicycle parking. Access to parking would be provided off of Hill Street and 9th Street. The Approved Project would also provide a total of 17,625 square feet of open space.

The Applicant proposes to modify the Approved Project to construct a 27-story (320 feet in height above grade) mixed-use project comprised of approximately 257,569 square feet of floor area, with up to 305 residential dwelling units, 3,500 square feet of restaurant uses and 2,671 square feet of retail uses (“Modified Project”). The Modified Project’s proposed floor area ratio (“FAR”) is 7.45:1. The allowable FAR for the Project Site is 6:1 and increases to 13:1 through a Transfer of Floor Area (“TFAR”). A total of 336 vehicle parking spaces would be provided on-site. Parking would be provided within one subterranean level, partially at grade and in levels two through five. Level five would support additional parking behind habitable space fronting Hill Street and 9th Street. Vehicular access to the parking structure would be provided via a two-way driveway located along Hill Street and a two-way driveway located along 9th Street. The Modified Project would provide a total of 308 long-term and 34 short-term bicycle parking spaces on-site. The Modified Project would provide approximately 32,225 square feet of open space and amenity areas.

The Applicant is requesting the approval of the following discretionary actions from the Los Angeles Department of City Planning: 1) A Transfer of Floor Area Rights of less than 50,000 square feet; and 2) Site Plan Review. The Applicant is also requesting the CRA/LA, a designated local authority, successor agency to the Community Redevelopment Agency of the City of Los Angeles: 1) Approve the TFAR of less than 50,000 square feet, pursuant to the City Center Redevelopment Plan; and 2) Make findings pursuant to the City Center Redevelopment Plan. The Applicant would also request approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities including, but not limited to, the following: excavation, shoring, grading, foundation, haul route (for the export of approximately 500 cy of asphalt debris and approximately 30,752 cy of soil), and building and tenant improvements for the Project Site, and the Board of Public Works, Urban Forestry Division, for removal and replacement of street trees.

APPLICANT:

Maple Multi-Family Land CA, L.P.

PREPARED BY:

Parker Environmental Consultants

ON BEHALF OF:

The City of Los Angeles
Department of City Planning
Environmental Review Section

April 22, 2016

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APPENDICES

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APPENDIX B: GEOTECHNICAL REPORT

- B-1. GEOCON West, Inc., Proposed Alexan South Broadway High-Rise Development 850 South Hill Street, Los Angeles, California, dated January 5, 2016.
- B-2. City of Los Angeles Department of Building and Safety, Geology and Soils Correction Letter, dated February 3, 2016.
- B-3. GEOCON West, Inc., Discussion Of City Of Los Angeles Correction Letter, Proposed Alexan South Broadway High-Rise Development 850 South Hill Street, Los Angeles, California, dated March 2, 2016.

APPENDIX C: GREENHOUSE GAS EMISSIONS CALCULATIONS WORKSHEETS

APPENDIX D: ENVIRONMENTAL SITE ASSESSMENT

FREY Environmental, Inc., Phase I Environmental Site Assessment 850 South Hill Street, Los Angeles, California (APN 5144-017-037), dated February 27, 2015.

APPENDIX E: NOISE STUDY

- E-1. Noise Monitoring Data And Calculation Worksheets
- E-2. Construction Noise and Distance Attenuation
- E-3. Swinerton Builders, Working Hours on the Alexan Project, dated April 8, 2016

APPENDIX F: TRAFFIC STUDY

- F-1. The Mobility Group, Alexan South Broadway Project Traffic Study, dated August 3, 2015.
- F-2. The Mobility Group, Supplemental Traffic Review Memorandum for 850. S. Hill Street Project Traffic Memo, dated January 22, 2016.

- F-3. City of Los Angeles, Department of Transportation, Supplemental Traffic Assessment for the Proposed Revised Development At 850 South Hill Street, dated February 3, 2016.

APPENDIX G: DUE DILIGENCE REPORT

PSOMAS, 850 South Hill Street Preliminary Due Diligence Report of Existing Infrastructure, dated February 11, 2015.

APPENDIX H: HISTORIC ASSESSMENT

Historic Resources Group, Historic Assessment 850 South Hill Street, dated January 29, 2016.

APPENDIX I: VIBRATION STUDY

ATS Consulting, Vibration Study for the Proposed Residential Tower on 9th Street and Hill, Downtown Los Angeles, dated April 26, 2006.

APPENDIX J: SCHOOL CAPACITY REPORT

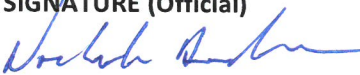
Los Angeles Unified School District, Facilities Services Division, LAUSD Schools Enrollments and Capacities Report, dated November 18, 2015.

CITY OF LOS ANGELES

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

CALIFORNIA ENVIRONMENTAL QUALITY ACT

ADDENDUM TO THE ADOPTED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY: City of Los Angeles		COUNCIL DISTRICT: 14 – Jose Huizar
PROJECT TITLE: The Alexan Project	ENVIRONMENTAL CASE: ENV-2006-6302-MND-REC1	CASE NO. ZA-2006-6350-YV-ZAA-SPR and VTT-66505
PROJECT LOCATION 840 - 856 S. Hill Street; and 217 - 225 W. 9th Street, Los Angeles 90014		
PROJECT DESCRIPTION: In 2007, a mixed-use high-rise project containing 167 residential condominium units and 7,107 square feet of lobby/retail space within 190,902 square feet of floor area was analyzed in the adopted Mitigated Negative Declaration (ENV-2006-6302-MND). The Project was approved for 158 residential condominium units and 5,780 square feet of ground floor commercial uses in case numbers ZA-2006-6350-YV-ZAA-SPR and VTT-66505 ("Approved Project"). The Approved Project would achieve a maximum height of 246 feet, or 21-stories with 2 subterranean parking levels. A total of 245 parking spaces were approved, with no bicycle parking. Access to parking would be provided off of Hill Street and 9 th Street. The Approved Project would also provide a total of 17,625 square feet of open space. The Applicant proposes to modify the Approved Project to construct a 27-story (320 feet in height above grade) mixed-use project comprised of approximately 257,569 square feet of floor area, with up to 305 residential dwelling units, 3,500 square feet of restaurant uses and 2,671 square feet of retail uses ("Modified Project"). The Modified Project's proposed floor area ratio ("FAR") is 7.45:1. The allowable FAR for the Project Site is 6:1 and increases to 13:1 through a Transfer of Floor Area ("TFAR"). A total of 336 parking spaces would be provided on-site. Parking would be provided in one subterranean level, at grade and levels two through five. Level five would support additional parking behind habitable space fronting Hill Street and 9 th Street. Vehicular access to the parking structure would be provided via a two-way driveway located along Hill Street and a two-way driveway located along 9 th Street. The Modified Project would provide a total of 308 long-term and 34 short-term bicycle parking spaces on-site. The Modified Project would provide approximately 32,225 square feet of open space and amenity areas. The Applicant is requesting the approval of the following discretionary actions from the Los Angeles Department of City Planning: 1) A Transfer of Floor Area Rights (TFAR) of less than 50,000 square feet; and 2) Site Plan Review (SPR). The Applicant is also requesting the CRA/LA, a designated local authority, successor agency to the Community Redevelopment Agency of the City of Los Angeles: 1) Approve the TFAR of less than 50,000 square feet, pursuant to the City Center Redevelopment Plan; and 2) Make findings pursuant to the City Center Redevelopment Plan. The Applicant would also request approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities including, but not limited to, the following: excavation, shoring, grading, foundation, haul route (for the export of approximately 500 cy of asphalt debris and approximately 30,752 cy of soil), and building and tenant improvements for the Project Site, and the Board of Public Works, Urban Forestry Division, for removal and replacement of street trees.		
NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY Maple Multi-Family Land CA, L.P. 5790 Fleet Street, Suite 140 Carlsbad, CA 92008		
FINDING: The Department of City Planning of the City of Los Angeles has proposed that an Addendum to the previously adopted mitigated negative declaration be prepared for this project. The mitigation measures outlined in the adopted MND, and as referenced on the attached pages will reduce any potentially significant adverse effects to a level of insignificance.		
SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED		
The Addendum to the Initial Study prepared for the Modified Project is attached.		
NAME OF PERSON PREPARING FORM Nicholas Hendricks	TITLE Senior City Planner	TELEPHONE NUMBER (213) 978-1377
ADDRESS 200 North Spring Street, 7 th Floor Los Angeles, CA 90012	SIGNATURE (Official) 	DATE April 22, 2016

CITY OF LOS ANGELES

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

CALIFORNIA ENVIRONMENTAL QUALITY ACT


INITIAL STUDY and CHECKLIST (CEQA Guidelines Section 15063)

LEAD CITY AGENCY: City of Los Angeles		COUNCIL DISTRICT: CD 14		DATE: April 22, 2016	
RESPONSIBLE AGENCIES: Department of City Planning					
ENVIRONMENTAL CASE: ENV-2006-6302-MND-REC 1			RELATED CASES: ZA-2006-6350-YV-ZAA-SPR and VTT-66505		
PREVIOUS ACTIONS CASE NO. ENV-2006-6302-MND, ZA-2006-6350-YV-ZAA-SPR and VTT-66505			<input type="checkbox"/> DOES have significant changes from previous actions. <input checked="" type="checkbox"/> DOES NOT have significant changes from previous actions.		
<p>PROJECT DESCRIPTION: In 2007, a mixed-use high-rise project containing 167 residential condominium units and 7,107 square feet of lobby/retail space within 190,902 square feet of floor area was analyzed in the adopted Mitigated Negative Declaration (ENV-2006-6302-MND). The Approved Project was approved for 158 residential condominium units and 5,780 square feet of ground floor commercial uses in case numbers ZA-2006-6350-YV-ZAA-SPR and VTT-66505 ("Approved Project"). The Approved Project would achieve a maximum height of 246 feet, or 21-stories with 2 subterranean parking levels. A total of 245 parking spaces were approved, with no bicycle parking. Access to parking would be provided off of Hill Street and 9th Street. The Approved Project would also provide a total of 17,625 square feet of open space. The Applicant proposes to modify the Approved Project to construct a 27-story (320 feet in height above grade) mixed-use project comprised of approximately 257,569 square feet of floor area, with up to 305 residential dwelling units, 3,500 square feet of restaurant uses and 2,671 square feet of retail uses ("Modified Project"). The Modified Project's proposed floor area ratio ("FAR") is 7.45:1. The allowable FAR for the Project Site is 6:1 and increases to 13:1 through a Transfer of Floor Area ("TFAR"). A total of 336 vehicle parking spaces would be provided on-site. Parking would be provided within one subterranean level, at grade and levels two through five. Level five would support additional parking behind habitable space fronting Hill Street and 9th Street. Vehicular access to the parking structure would be provided via a two-way driveway located along Hill Street and a two-way driveway located along 9th Street. The Modified Project would provide a total of 308 long-term and 34 short-term bicycle parking spaces on-site. The Modified Project would provide approximately 32,225 square feet of open space and amenity areas. The Applicant is requesting the approval of the following discretionary actions from the Los Angeles Department of City Planning: 1) A Transfer of Floor Area Rights (TFAR) of less than 50,000 square feet; and 2) Site Plan Review (SPR). The Applicant is also requesting the CRA/LA, a designated local authority, successor agency to the Community Redevelopment Agency of the City of Los Angeles: 1) Approve the TFAR of less than 50,000 square feet, pursuant to the City Center Redevelopment Plan; and 2) Make findings pursuant to the City Center Redevelopment Plan. The Applicant would also request approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities including, but not limited to, the following: excavation, shoring, grading, foundation, haul route (for the export of approximately 500 cy of asphalt debris and approximately 30,752 cy of soil), and building and tenant improvements for the Project Site, and the Board of Public Works, Urban Forestry Division, for removal and replacement of street trees.</p>					
<p>ENVIRONMENTAL SETTING: The Project Site includes five parcels (Assessor Parcel No. 5144-017-037) that includes 34,595 square feet of lot area (0.79 acres). The Project Site is currently occupied by surface parking. The surrounding properties are developed with multi-family housing, office, commercial land uses, and surface parking lots. Further details are provided in the expanded Addendum to the IS/MND (attached).</p>					
PROJECT LOCATION: 850 S. Hill Street, Los Angeles, CA 90014					
COMMUNITY PLAN AREA: Central City STATUS: <input type="checkbox"/> Preliminary <input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Adopted (2003)			<input checked="" type="checkbox"/> Does Conform to Plan <input type="checkbox"/> Does NOT Conform to Plan		AREA PLANNING COMMISSION: Central CERTIFIED NEIGHBORHOOD COUNCIL: Downtown Los Angeles
EXISTING ZONING: C5-4D		MAX DENSITY ZONING: 6:1, or 13:1 with TFAR			LA River Adjacent: No
GENERAL PLAN LAND USE: Regional Center Commercial		MAX. DENSITY PLAN: 6:1, or 13:1 with TFAR		PROPOSED PROJECT DENSITY: 7.45:1	

Determination (To be completed by Lead Agency)

On the basis of this initial evaluation:

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

	City Planner	(213) 978-1377
Signature	Title	Phone

Evaluation of Environmental Impacts:

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

explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross referenced).

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

Environmental Factors Potentially Affected:

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

<input checked="" type="checkbox"/> AESTHETICS <input type="checkbox"/> AGRICULTURE AND FOREST RESOURCES <input checked="" type="checkbox"/> AIR QUALITY <input type="checkbox"/> BIOLOGICAL RESOURCES <input checked="" type="checkbox"/> CULTURAL RESOURCES <input checked="" type="checkbox"/> GEOLOGY AND SOILS	<input type="checkbox"/> GREENHOUSE GAS EMISSIONS <input checked="" type="checkbox"/> HAZARDS AND HAZARDOUS MATERIALS <input checked="" type="checkbox"/> HYDROLOGY AND WATER QUALITY <input checked="" type="checkbox"/> LAND USE AND PLANNING <input type="checkbox"/> MINERAL RESOURCES <input checked="" type="checkbox"/> NOISE	<input type="checkbox"/> POPULATION AND HOUSING <input checked="" type="checkbox"/> PUBLIC SERVICES <input type="checkbox"/> RECREATION <input type="checkbox"/> TRANSPORTATION/CIRCULATION <input type="checkbox"/> UTILITIES <input type="checkbox"/> MANDATORY FINDINGS OF SIGNIFICANCE
<p>INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)</p> <p>PROPONENT NAME: Maple Multi-Family Land CA, L.P. PHONE NUMBER: (760) 444-5206</p> <p>APPLICANTS ADDRESSES: 5790 Fleet Street, Suite 140 Carlsbad, CA 92008</p> <p>AGENCY REQUIRING CHECKLIST: City of Los Angeles DATE SUBMITTED: April 22, 2016 Department of City Planning</p> <p>PROPOSAL NAME (If Applicable): The Alexan Project</p>		

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<p>PLEASE NOTE THAT EACH AND EVERY RESPONSE IN THE CITY OF LOS ANGELES INITIAL STUDY AND CHECKLIST IS SUMMARIZED FROM AND BASED UPON THE ENVIRONMENTAL ANALYSIS CONTAINED IN ATTACHMENT B, EXPLANATION OF CHECKLIST DETERMINATIONS. PLEASE REFER TO THE APPLICABLE RESPONSE IN ATTACHMENT B FOR A DETAILED DISCUSSION OF CHECKLIST DETERMINATIONS.</p>					
I. AESTHETICS					
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SCENIC VISTA?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	SUBSTANTIALLY DAMAGE SCENIC RESOURCES, INCLUDING, BUT NOT LIMITED TO, TREES, ROCK OUTCROPPINGS, AND HISTORIC BUILDINGS, OR OTHER LOCALLY RECOGNIZED DESIRABLE AESTHETIC NATURAL FEATURE WITHIN A CITY-DESIGNATED SCENIC HIGHWAY?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	SUBSTANTIALLY DEGRADE THE EXISTING VISUAL CHARACTER OR QUALITY OF THE SITE AND ITS SURROUNDINGS?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	CREATE A NEW SOURCE OF SUBSTANTIAL LIGHT OR GLARE WHICH WOULD ADVERSELY AFFECT DAY OR NIGHTTIME VIEWS IN THE AREA?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
II. AGRICULTURE AND FOREST RESOURCES					
a.	CONVERT PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE, AS SHOWN ON THE MAPS PREPARED PURSUANT TO THE FARMLAND MAPPING AND MONITORING PROGRAM OF THE CALIFORNIA RESOURCES AGENCY, TO NON-AGRICULTURAL USE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	CONFLICT WITH EXISTING ZONING FOR AGRICULTURAL USE, OR A WILLIAMSON ACT CONTRACT?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	CONFLICT WITH EXISTING ZONING FOR, OR CAUSE REZONING OF, FOREST LAND (AS DEFINED IN PUBLIC RESOURCES CODE SECTION 1220(G)), TIMBERLAND (AS DEFINED BY PUBLIC RESOURCES CODE SECTION 4526), OR TIMBERLAND ZONED TIMBERLAND PRODUCTION (AS DEFINED BY GOVERNMENT CODE SECTION 51104(G))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	RESULT IN THE LOSS OF FOREST LAND OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	INVOLVE OTHER CHANGES IN THE EXISTING ENVIRONMENT WHICH, DUE TO THEIR LOCATION OR NATURE, COULD RESULT IN CONVERSION OF FARMLAND, TO NON-AGRICULTURAL USE OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
III. AIR QUALITY					
a.	CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE SCAQMD AIR QUALITY MANAGEMENT PLAN OR CONGESTION MANAGEMENT PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	VIOLATE ANY AIR QUALITY STANDARD OR CONTRIBUTE SUBSTANTIALLY TO AN EXISTING OR PROJECTED AIR QUALITY VIOLATION?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE AIR BASIN IS NON-ATTAINMENT (OZONE, CARBON MONOXIDE, & PM 10) UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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e.	CREATE OBJECTIONABLE ODORS AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IV. BIOLOGICAL RESOURCES					
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT, EITHER DIRECTLY OR THROUGH HABITAT MODIFICATION, ON ANY SPECIES IDENTIFIED AS A CANDIDATE, SENSITIVE, OR SPECIAL STATUS SPECIES IN LOCAL OR REGIONAL PLANS, POLICIES, OR REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE ?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON ANY RIPARIAN HABITAT OR OTHER SENSITIVE NATURAL COMMUNITY IDENTIFIED IN THE CITY OR REGIONAL PLANS, POLICIES, REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON FEDERALLY PROTECTED WETLANDS AS DEFINED BY SECTION 404 OF THE CLEAN WATER ACT (INCLUDING, BUT NOT LIMITED TO, MARSH VERNAL POOL, COASTAL, ETC.) THROUGH DIRECT REMOVAL, FILLING, HYDROLOGICAL INTERRUPTION, OR OTHER MEANS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	INTERFERE SUBSTANTIALLY WITH THE MOVEMENT OF ANY NATIVE RESIDENT OR MIGRATORY FISH OR WILDLIFE SPECIES OR WITH ESTABLISHED NATIVE RESIDENT OR MIGRATORY WILDLIFE CORRIDORS, OR IMPEDE THE USE OF NATIVE WILDLIFE NURSERY SITES?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	CONFLICT WITH ANY LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES, SUCH AS TREE PRESERVATION POLICY OR ORDINANCE (E.G., OAK TREES OR CALIFORNIA WALNUT WOODLANDS)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	CONFLICT WITH THE PROVISIONS OF AN ADOPTED HABITAT CONSERVATION PLAN, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
V. CULTURAL RESOURCES					
a.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF A HISTORICAL RESOURCE AS DEFINED IN STATE CEQA SECTION 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO STATE CEQA SECTION 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	DIRECTLY OR INDIRECTLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE OR SITE OR UNIQUE GEOLOGIC FEATURE?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	DISTURB ANY HUMAN REMAINS, INCLUDING THOSE INTERRED OUTSIDE OF FORMAL CEMETERIES?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VI. GEOLOGY AND SOILS					
a.	EXPOSURE OF PEOPLE OR STRUCTURES TO POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY OR DEATH INVOLVING: 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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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OR BASED ON OTHER SUBSTANTIAL EVIDENCE OF A KNOWN FAULT? REFER TO DIVISION OF MINES AND GEOLOGY SPECIAL PUBLICATION 42.				
b. STRONG SEISMIC GROUND SHAKING?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. SEISMIC-RELATED GROUND FAILURE, INCLUDING LIQUEFACTION?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. LANDSLIDES?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. BE LOCATED ON A GEOLOGIC UNIT OR SOIL THAT IS UNSTABLE, OR THAT WOULD BECOME UNSTABLE AS A RESULT OF THE PROJECT, AND POTENTIAL RESULT IN ON- OR OFF-SITE LANDSLIDE, LATERAL SPREADING, SUBSIDENCE, LIQUEFACTION, OR COLLAPSE?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. BE LOCATED ON EXPANSIVE SOIL, AS DEFINED IN TABLE 18-1-B OF THE UNIFORM BUILDING CODE (1994), CREATING SUBSTANTIAL RISKS TO LIFE OR PROPERTY?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. HAVE SOILS INCAPABLE OF ADEQUATELY SUPPORTING THE USE OF SEPTIC TANKS OR ALTERNATIVE WASTE WATER DISPOSAL SYSTEMS WHERE SEWERS ARE NOT AVAILABLE FOR THE DISPOSAL OF WASTE WATER?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VII. GREENHOUSE GAS EMISSIONS				
a. GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT?	<input 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"/>
VIII. HAZARDS AND HAZARDOUS MATERIALS				
a. CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. EMIT HAZARDOUS EMISSIONS OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL?	<input 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 IT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT RESULT IN A SAFETY HAZARD FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT RESULT IN A SAFETY HAZARD FOR THE PEOPLE RESIDING	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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	OR WORKING IN THE AREA?				
g.	IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h.	EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY OR DEATH INVOLVING WILDLAND FIRES, INCLUDING WHERE WILDLANDS ARE ADJACENT TO URBANIZED AREAS OR WHERE RESIDENCES ARE INTERMIXED WITH WILDLANDS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IX. HYDROLOGY AND WATER QUALITY					
a.	VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	SUBSTANTIALLY DEplete GROUNDWATER SUPPLIES OR INTERFERE WITH GROUNDWATER RECHARGE SUCH THAT THERE WOULD BE A NET DEFICIT IN AQUIFER VOLUME OR A LOWERING OF THE LOCAL GROUNDWATER TABLE LEVEL (E.G., THE PRODUCTION RATE OF PRE-EXISTING NEARBY WELLS WOULD DROP TO A LEVEL WHICH WOULD NOT SUPPORT EXISTING LAND USES OR PLANNED LAND USES FOR WHICH PERMITS HAVE BEEN GRANTED)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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, IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON- OR OFF-SITE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, OR SUBSTANTIALLY INCREASE THE RATE OR AMOUNT OF SURFACE RUNOFF IN AN MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFF SITE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	CREATE OR CONTRIBUTE RUNOFF WATER WHICH WOULD EXCEED THE CAPACITY OF EXISTING OR PLANNED STORMWATER DRAINAGE SYSTEMS OR PROVIDE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	OTHERWISE SUBSTANTIALLY DEGRADE WATER QUALITY?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g.	PLACE HOUSING WITHIN A 100-YEAR FLOOD PLAIN AS MAPPED ON FEDERAL FLOOD HAZARD BOUNDARY OR FLOOD INSURANCE RATE MAP OR OTHER FLOOD HAZARD DELINEATION MAP?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h.	PLACE WITHIN A 100-YEAR FLOOD PLAIN STRUCTURES WHICH WOULD IMPEDE OR REDIRECT FLOOD FLOWS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i.	EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INQUIRY OR DEATH INVOLVING FLOODING, INCLUDING FLOODING AS A RESULT OF THE FAILURE OF A LEVEE OR DAM?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j.	INUNDATION BY SEICHE, TSUNAMI, OR MUDFLOW?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
X. LAND USE AND PLANNING					
a.	PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	CONFLICT WITH APPLICABLE LAND USE PLAN, POLICY OR REGULATION OF AN AGENCY WITH JURISDICTION OVER THE PROJECT (INCLUDING	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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	BUT NOT LIMITED TO THE GENERAL PLAN, SPECIFIC PLAN, COASTAL PROGRAM, OR ZONING ORDINANCE) ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT?				
c.	CONFLICT WITH ANY APPLICABLE HABITAT CONSERVATION PLAN OR NATURAL COMMUNITY CONSERVATION PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XI. MINERAL RESOURCES					
a.	RESULT IN THE LOSS OF AVAILABILITY OF A KNOWN MINERAL RESOURCE THAT WOULD BE OF VALUE TO THE REGION AND THE RESIDENTS OF THE STATE?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>
XII. NOISE					
a.	EXPOSURE OF PERSONS TO OR GENERATION OF NOISE IN LEVEL IN EXCESS OF STANDARDS ESTABLISHED IN THE LOCAL GENERAL PLAN OR NOISE ORDINANCE, OR APPLICABLE STANDARDS OF OTHER AGENCIES?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	EXPOSURE OF PEOPLE TO OR GENERATION OF EXCESSIVE GROUND BORNE VIBRATION OR GROUND BORNE NOISE LEVELS?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	A SUBSTANTIAL PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	A SUBSTANTIAL TEMPORARY OR PERIODIC INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XIII. POPULATION AND HOUSING					
a.	INDUCE SUBSTANTIAL POPULATION GROWTH IN AN AREA EITHER DIRECTLY (FOR EXAMPLE, BY PROPOSING NEW HOMES AND BUSINESSES) OR INDIRECTLY (FOR EXAMPLE, THROUGH EXTENSION OF ROADS OR OTHER INFRASTRUCTURE)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	DISPLACE SUBSTANTIAL NUMBERS OF EXISTING HOUSING NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	DISPLACE SUBSTANTIAL NUMBERS OF PEOPLE NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XIV. PUBLIC SERVICES					
a.	FIRE PROTECTION?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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b.	POLICE PROTECTION?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	SCHOOLS?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	PARKS?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e.	OTHER PUBLIC FACILITIES?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XV. RECREATION					
a.	WOULD THE PROJECT INCREASE THE USE OF EXISTING NEIGHBORHOOD AND REGIONAL PARKS OR OTHER RECREATIONAL FACILITIES SUCH THAT SUBSTANTIAL PHYSICAL DETERIORATION OF THE FACILITY WOULD OCCUR OR BE ACCELERATED?	<input 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"/>
XVI. TRANSPORTATION/CIRCULATION					
a.	CONFLICT WITH AN APPLICABLE PLAN, ORDINANCE OR POLICY ESTABLISHING MEASURES OF EFFECTIVENESS FOR THE PERFORMANCE OF THE CIRCULATION SYSTEM, TAKING INTO ACCOUNT ALL MODES OF TRANSPORTATION INCLUDING MASS TRANSIT AND NON-MOTORIZED TRAVEL AND RELEVANT COMPONENTS OF THE CIRCULATION SYSTEM, INCLUDING BUT NOT LIMITED TO INTERSECTIONS, STREETS, HIGHWAYS AND FREEWAYS, PEDESTRIAN AND BICYCLE PATHS AND MASS TRANSIT?	<input 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.	RESULT IN A CHANGE IN AIR TRAFFIC PATTERNS, INCLUDING EITHER AN INCREASE IN TRAFFIC LEVELS OR A CHANGE IN LOCATION THAT RESULTS IN SUBSTANTIAL SAFETY RISKS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	SUBSTANTIALLY INCREASE HAZARDS TO A DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	RESULT IN INADEQUATE EMERGENCY ACCESS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	RESULT IN INADEQUATE PARKING CAPACITY?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g.	CONFLICT WITH ADOPTED POLICIES, PLANS OR PROGRAMS REGARDING PUBLIC TRANSIT, BICYCLE, OR PEDESTRIAN FACILITIES, OR OTHERWISE DECREASE THE PERFORMANCE OR SAFETY OF SUCH FACILITIES?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XVII. UTILITIES					
a.	EXCEED WASTEWATER TREATMENT REQUIREMENTS OF THE APPLICABLE REGIONAL WATER QUALITY CONTROL BOARD?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

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

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

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

The Modified Project as identified in the project description may cause potentially significant impacts on the environment without mitigation. The Addendum to the environmental analysis (ENV-2006-6302-MND) concludes that none of the proposed changes to the Project would generate or result in any new significant environmental impacts and the mitigation measures identified in the adopted Mitigated Negative Declaration shall be readopted for the purposes of avoiding and mitigating all potential adverse impacts on the environment in association with the associated case(s): ZA-2006-6350-YV-ZAA-SPR and VTT-66505. Finally, based on the fact that these impacts can be feasibly mitigated to less than significant, and based on the findings and thresholds for Mandatory Findings of Significance as described in the California Environmental Quality Act, section 15065, the overall project impacts(s) on the environment (after mitigation) **will not**:

- Substantially degrade environmental quality.
- Substantially reduce fish or wildlife habitat.
- Cause a fish or wildlife habitat to drop below self-sustaining levels.
- Threaten to eliminate a plant or animal community.
- Reduce number, or restrict range of a rare, threatened, or endangered species.
- Eliminate important examples of major periods of California history or prehistory.
- Achieve short-term goals to the disadvantage of long-term goals.
- Result in environmental effects that are individually limited but cumulatively considerable.
- Result in environmental effects that will cause substantial adverse effects on human beings.

ADDITIONAL INFORMATION:

All supporting documents and references are contained in the Environmental Case File referenced above and may be viewed in the EIR Unit, Room 763, City Hall.

For City information, addresses, and phone numbers: visit the City’s website at <http://www.lacity.org>; City Planning- and Zoning Information Mapping Automated System (ZIMAS) cityplanning.lacity.org/ or EIR Unit, City Hall, 200 N Spring Street, Room 763. Seismic Hazard Maps – <http://gmw.consrv.ca.gov/shmp/> Engineering/Infrastructure/Topographic Maps/Parcel Information – <http://boemaps.eng.ci.la.ca.us/index0.1htm> or City’s main website under the heading “Navigate LA.”

PREPARED BY: Jenna Monterrosa	TITLE: City Planner	TELEPHONE NO.: (213) 978-1377	DATE: April 22, 2016
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APPENDIX A: ENVIRONMENTAL IMPACTS EXPLANATION TABLE

	Impact	Explanation	Mitigation Measures
I. AESTHETICS			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	Mitigation Measure 1.
d.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
II. AGRICULTURAL RESOURCES			
a.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
III. AIR QUALITY			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	Mitigation Measures 2, 3, 4, 5, 6, 7, 8, and 9.
c.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
IV. BIOLOGICAL RESOURCES			
a.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact	See expanded environmental analysis (attached).	Mitigation Measure 10.
f.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
V. CULTURAL RESOURCES			
a.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	Mitigation Measures 11, 12, 13, 14, 15, 16, and 17.
b.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	Mitigation Measures 17 and 18.
c.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	Mitigation Measures 19 and 20.
d.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	Mitigation Measures 21 and 22.
VI. GEOLOGY AND SOILS			
a.	Less Than Significant Impact	See expanded environmental analysis (attached).	No mitigation measures are required
b.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	Mitigation Measures 23, 24, 25, 26 and 27.
c.	Less Than Significant Impact	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.

	Impact	Explanation	Mitigation Measures
e.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	Mitigation Measures 28, 29, 30, 31, and 32.
f.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	Mitigation Measure 33.
g.	Less Than Significant Impact	See expanded environmental analysis (attached).	No mitigation measures are required.
h.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
VII. GREENHOUSE GAS EMISSIONS			
a.	Less Than Significant Impact	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact	See expanded environmental analysis (attached).	No mitigation measures are required.
VIII. HAZARDS AND HAZARDOUS MATERIALS			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	Mitigation Measures 34, 35, 36, and 37.
c.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
f.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
g.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	Mitigation Measures 38 and 39.
h.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
IX. HYDROLOGY AND WATER QUALITY			
a.	Potentially Significant Impact Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	Mitigation Measures 40, 41, 42, 43, 44 and 45.
b.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	No Impact..	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
f.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
g.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
h.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
i.	Less Than Significant Level.	See expanded environmental analysis (attached).	No mitigation measures are required.
j.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
X. LAND USE AND PLANNING			
a.	Less Than Significant Level.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Potentially Significant Impact Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	Mitigation Measures 46 and 47.
c.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XI. MINERAL RESOURCES			
a.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XII. NOISE			
a.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	Mitigation Measures 48, 49, 50, 51, 52, 53, and 54.
b.	Potentially Significant Unless	See expanded environmental analysis (attached).	Mitigation Measures 11, 12, 13, and

	Impact	Explanation	Mitigation Measures
	Mitigation Incorporated.		14.
c.	Less than Significant Impact	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
f.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XIII. POPULATION AND HOUSING			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XIV. PUBLIC SERVICES			
a.i	Potentially Significant Impact Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	Mitigation Measures 38, 39, 55, 56, 57, 58, 59, 60, 61, 62, 63, and 64.
a.ii	Potentially Significant Impact Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	Mitigation Measures 65, 66, 67, 68 and 69.
a.iii	Potentially Significant Impact Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	Mitigation Measure 70.
a.iv.	Potentially Significant Impact Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	Mitigation Measure 71.
a.v.	Potentially Significant Impact Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	Mitigation Measure 72.
XV. RECREATION			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XVI. TRANSPORTATION/CIRCULATION			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact.	See expanded environmental analysis (attached).	Mitigation Measures 38, 39, 59, 60 and 65.
f.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
g.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XVII. UTILITIES AND SERVICE SYSTEMS			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	Mitigation Measures 73 and 74
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	Mitigation Measures 38, 39 and 75.
c.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See expanded environmental analysis (attached).	Mitigation Measures 76, 77, 78, 79 and 80.
e.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
f.	Less Than Significant Impact.	See expanded environmental analysis (attached).	Mitigation Measures 81, 82, 83, 84, 85, 86 and 87.
g.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.

	Impact	Explanation	Mitigation Measures
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	Less Than Significant Impact.	See expanded environmental analysis (attached).	See mitigation measures above.

SUMMARY OF MITIGATION MEASURES

AESTHETICS

1. The Applicant shall ensure, through appropriate postings and daily visual inspections, that no graffiti and unauthorized materials are posted on any temporary construction barriers, pedestrian walkways, or other structures, and that any such temporary barriers and walkways shall be maintained in a visually attractive manner throughout the construction period.

AGRICULTURE AND FORESTRY RESOURCES

No mitigation measures are required.

AIR QUALITY

2. Water or a stabilizing agent shall be applied to exposed surfaces in sufficient quantity to prevent generation of dust plumes.
3. Track-out shall not extend 25 feet or more from an active operation, and track-out shall be removed at the conclusion of each workday.
4. A wheel washing system shall be installed and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site.
5. All haul trucks hauling soil, sand, and other loose materials shall maintain at least six inches of freeboard in accordance with California Vehicle Code Section 23114.
6. All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).
7. Traffic speeds on unpaved roads shall be limited to 15 miles per hour.
8. Operations on unpaved surfaces shall be suspended when winds exceed 25 miles per hour.
9. Heavy-equipment operations shall be suspended during first and second stage smog alerts.

BIOLOGICAL RESOURCES

10. The proposed landscaping plan shall meet all the general goals of the Landscaping Ordinance, including a tree planning scheme that will provide sufficient shade to reduce heat attenuation around buildings. Drip irrigation will be used wherever appropriate, and highly durable, drought tolerant species will be used to the maximum extent feasible.

CULTURAL RESOURCES

11. Prior to commencement of construction of the new building, a qualified structural engineer shall survey the existing foundations and other structural aspects of immediately adjacent historic buildings and provide a shoring design to protect the Eastern Columbia and May Company buildings from potential damage. Pot holing or other destructive testing of the below grade conditions on the project site and immediately adjacent historic buildings may be necessary to establish baseline conditions and prepare the shoring design. If feasible, project, and in particular shoring, design shall avoid pile driving within 25 feet of the existing immediately adjacent historic buildings. The shoring design shall specify threshold limits for vibration causing activities consistent with the ATS report.
12. The qualified structural engineer shall hold a valid license to practice structural engineering in the State of California and have a minimum of 10 years specific experience rehabilitating historic buildings and applying the Secretary's Standards to such projects. The qualified structural engineer shall submit a pre-construction survey letter establishing baseline conditions to be monitored during construction to the lead agency and to the mitigation monitor prior to issuance of any foundation only or building permit for the proposed project.
13. The qualified structural engineer shall monitor vibration during the pile driving or other vibration-causing construction activities to ensure that the impact threshold established in the ATS report and shoring design is not exceeded. If feasible, alternative means of setting piles such as predrilled holes or hydraulic pile driving shall be employed to avoid exceeding the impact threshold established in the ATS report.
14. At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-on letter describing damage, if any, to immediately adjacent historic buildings and recommendations for any repair, as may be necessary, in conformance with the Secretary's Standards. Repairs to immediately adjacent historic buildings shall be undertaken, or performance bonds securing the same, and completed in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24) prior to issuance of any temporary or permanent certificate of occupancy for the new building.
15. To ensure compatibility, designs for the proposed new building adjacent to historical resources shall be reviewed, commented on and approved for conformance with Secretary's Standards by a preservation architect meeting the Secretary of the Interior's Professional Qualifications Standards in historic architecture. Modifications recommended by the preservation architect shall be incorporated in the design prior to issuance of building permits for the new building adjacent to historical resources.
16. The qualified preservation architect shall hold a valid license to practice architecture in the State of California and have a minimum of 10 years specific experience rehabilitating historic buildings and applying the Secretary's Standards to such projects. The qualified preservation architect will assess design of the proposed

new building for its compatibility in mass, materials, relationship of solids to voids, scale and color with immediately adjacent identified historical resources and with the character of its surroundings. "The relationship of buildings to each other, setbacks... views, driveways and walkways and street trees together create the character of a district or neighborhood." Without imitating the features of historic buildings, the design for adjacent contemporary buildings should: use similar or complimentary materials, repeat and/or respect the heights of floors, rhythms and depths of bays, use compatible window/door openings and types, and correspond to roof heights and shapes, all of which will help maintain the existing character of the area. A letter summarizing the qualified preservation architect's findings shall be submitted to the lead agency to establish the proposed project's conformance with the Secretary's Standards and compatibility with historical resources prior to issuance of any building permit for the proposed project.

17. During excavation and grading, if archaeological resources are uncovered, all work in that area shall cease and be diverted so as to allow for a determination of the value of the resource. Construction activities in that area may commence once the uncovered resources are collected by an archaeologist and properly processed. Any archaeological remains and/or reports and surveys shall be submitted to the ~~UCLA Archaeological Information Center~~ South Central Coastal Information Center, California State University, Fullerton.
18. The Applicant shall sign a covenant and agreement with the City to allow suspension of construction activities for the recovery or recordation of all archaeological resources prior to the issuance of a building permit.
19. During excavation and grading, if paleontological resources are uncovered, all work in that area shall cease and be diverted so as to allow for a determination of the value of the resource. Construction activities in that area may commence once the uncovered resources are collected by a paleontologist and properly processed. Any paleontological remains and/or reports and surveys shall be submitted to the Los Angeles County Natural History Museum.
20. The Applicant shall sign a covenant and agreement with the City to allow the suspension of construction activities for the recovery or recordation of all paleontological resources prior to the issuance of a building permit.
21. If human remains are discovered within either development parcel, work at the specific construction site shall be suspended, and the City Department of Building and Safety and County Coroner shall be notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (HAHC) shall be notified within 24 hours and the guidelines of the NAHC shall be implemented in the treatment and disposition of the remains.
22. The Applicant shall sign a covenant and agreement with the City to allow suspension of construction activities for the recovery of all human remains prior to the issuance of a building permit.

GEOLOGY AND SOILS

23. Unless otherwise so specified by the City of Los Angeles, the propose project shall demonstrate compliance with specific recommendations of the geotechnical engineering report prepared by ~~Geotechnologies, Inc. dated May 2, 2006, and contained herein as Appendix C~~ Geocon West, Inc., dated January 5, 2016, and

- contained herein as Appendix B, to the satisfaction of the City of Los Angeles Department of Building and Safety, as conditions to issuance of any grading and building permits.
24. The project shall conform to applicable criteria set forth in the Recommended Lateral Force Requirements and Commentary by the Structural Engineers Association of California.
 25. Seismic design for structures and foundations shall comply with the parameters outlined in the ~~1997 Uniform Building Code~~ 2013 California Building Code as designated for site-specific soil conditions.
 26. The project shall be designed to conform to the City of Los Angeles Seismic Safety Plan, and additional seismic safety requirements not encompassed by compliance with the Building Code and Grading Ordinance as may be identified by the Department of Building and Safety prior to Plan Check approval.
 27. The structural design of the project shall comply with the seismic standards of the ~~Uniform Building Code~~ California Building Code according to the seismic zone and construction type (S_c based on Table 16-J of the UBC).
 28. During inclement periods of the year, when rain is threatening ~~(between November 1 and April 15, per the Los Angeles Building Code, Sec. 7002.)~~ (between October 1 and April 15 per Chapter IX, Division 70 of the Los Angeles Municipal Code) an erosion control plan that identifies BMPs shall be implemented to the satisfaction of the City of Los Angeles Department of Building and Safety to minimize potential erosion during construction. The erosion control plan shall be a condition to issuance of any grading permit.
 29. To the extent feasible, grading shall be scheduled for completion prior to the start of the rainy season ~~(between November 1 and April 15, per the Los Angeles Building Code, Sec. 7002.)~~ (between October 1 and April 15 per Chapter IX, Division 70 of the Los Angeles Municipal Code) or detailed temporary erosion control plans shall be implemented in a manner satisfactory to the City of Los Angeles Department of Public Works.
 30. Appropriate erosion control and drainage devices shall be incorporated to the satisfaction of the Department of Building and Safety. Such measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, as well as planting fast-growing annual and perennial grasses in areas where construction is not immediately planned. These will shield and bind the soil.
 31. If temporary excavation slopes are to be maintained during the rainy season, it will be necessary to direct all drainage away from the top of the slope. No water shall be allowed to flow uncontrolled over the face of any temporary or permanent slope.
 32. Provisions shall be made for adequate surface drainage away from the areas of excavation as well as protection of excavated areas from flooding. The grading contractor shall control surface water and the transportation of silt and sediment.
 33. The project shall comply with the following Department of Building and Safety requirements (if not already covered by 23), prior to issuance of a grading permit for the project:

- Prior to the issuance of a grading permit by the Department of Building and Safety, the consulting geologist and soils engineer shall review and approve project grading plans. This approval shall be conferred by signature on the plans which clearly indicate the geologist and/or soils engineer have reviewed the plans prepared by the design engineer and that the plans include the recommendations contained in the report.
- Prior to the commencement of grading activities, a qualified geotechnical engineer and engineering geologist shall be employed for the purpose of observing earthwork procedures and testing fills for conformance to the recommendations of the City Engineer, approved grading plans, applicable grading codes, and the geotechnical report approved to the satisfaction of the Department of Building and Safety.
- During construction, Grading shall be observed, and reported by the project engineer. Grading shall be performed under the supervision of a licensed engineering geologist and/or soils engineer in accordance with applicable provisions of the Building Code and to the satisfaction of the City Engineer and the Superintendent of Building and Safety.
- Any recommendations prepared by the consulting geologist and/or soils engineer for correction of geologic hazards, if any, encountered during grading shall be submitted to the Department of Building and Safety for approval prior to issuance of a Certificate of Occupancy for the project.
- Grading and excavation activities shall be undertaken in compliance with all relevant requirements of the California Division of Industrial safety, the Occupational Safety and Health Act of 1970 and the Construction Safety Act.

GREENHOUSE GAS EMISSIONS

No mitigation measures are required.

HAZARDS AND HAZARDOUS MATERIALS

34. Sub-slab Vent System. A series of perforated vent lines and an associated 2-inch thick gravel blanket must be installed beneath the floor slab of the proposed structure. The perforated vent lines must be connected to solid vent piping that extends through the walls or pipe chases of the building to outlets above the roof line. A permanent dewatering system must be installed if the design high groundwater level for the project is not at least one foot below the lowest vent piping elevation. Groundwater was not encountered during the current site investigation to the maximum depth explored (i.e., 40 feet). The project soils engineer should identify the design groundwater elevation in accordance with LADBS criteria.
35. Impervious Membrane. A continuous gas membrane is required below the floor slab of the building. This membrane must be sealed against footing, pilings and utilities to form a gas-tight barrier beneath the building.
36. Utility Trench Dams. A section of impervious backfill consisting of compacted native soil or sand/cement slurry must be installed in utility trenches that extend beneath the perimeter of the building in order to prevent gas from migrating through sand or backfill.
37. Conduit Seals. Gas tight seals must be installed on all conduits (e.g., electrical, cable, T.V., telephone, etc.) that extend to the interior of the structure. The purpose of these seals is to prevent methane gas from

entering the subsurface cracks or discontinuities in the conduits and subsequently migrating to the interior of the building.

38. The ~~Homeowners Association~~ Applicant shall develop and implement an Emergency Procedures Plan, which includes notification to the City of Los Angeles EOO, the Central Division of the Los Angeles Police Department, Los Angeles Fire Department Central Division Headquarters, and Fire Station No. 10 (first call station) of any full or partial lane closures, movement of heavy construction equipment, construction within the 9th Street or Hill Street right-of-ways, or any use of the adjacent right-of-ways.
39. The Emergency Procedures Plan shall specify a process by which any activities in the adjacent right-of-ways shall be coordinated with the emergency requirements of the EOO and the Police and Fire Departments.

HYDROLOGY AND WATER QUALITY

40. The project shall comply with the requirements of the NPDES permit for stormwater discharge and with all applicable requirements of the RWQCB, USEPA and local agencies regarding water quality.
41. The project shall implement stormwater BMPs to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard shall be provided.
42. All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as "NO DUMPING-DRAINS TO OCEAN") and/or graphical icons to discourage illegal dumping.
43. The legibility of signs and stencils discouraging illegal dumping shall be maintained.
44. Materials used on site with the potential to contaminate stormwater shall be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs.
45. The ~~Homeowners Association~~ Applicant shall prepare and execute a covenant and agreement (Department of City Planning General form (CP-6770)) satisfactory to the Department of City Planning binding the owners to post-construction maintenance of all structural BMPs in accordance with the SUSMP.

LAND USE AND PLANNING

46. ~~Prior to recordation of the final tract map for the proposed project, Zoning Administrator Case No. 66505 shall be approved~~ Prior to the issuance of the Modified Project's building permits, the Modified Project shall demonstrate to the satisfaction of the Planning Department ~~as needed to assure~~ consistency with the goals and objectives of the City of Los Angeles General Plan, the Central City Community Plan and the requirements of the City of Los Angeles Zoning and Municipal Codes.
47. ~~Prior to recordation of the final tract map, the proposed project~~ Prior to issuance of the Modified Project's building permits, the Modified Project shall demonstrate that it fully meets the requirements of the

Community Redevelopment Agency as needed to assure consistency with the goals and objectives City Center Redevelopment Plan.

MINERAL RESOURCES

No mitigation measures are required.

NOISE

48. Construction contracts shall specify that all construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.
49. Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).
50. Equipment staging areas shall be located on the western portion of the project site as far as possible from the Eastern Columbia residential tower to the east.
51. Construction activity involving structural framing and the application of the exterior skin shall be limited to the hours of ~~9:00 a.m. to 3:00 p.m.~~ 8:00 a.m. to 6:00 p.m.
52. During construction activity, the applicant shall periodically conduct 24-hour noise monitoring within Eastern Columbia residential tower dwelling units facing the project site or along the western façade of the Eastern Columbia residential tower. Additional mitigation shall be implemented for residential units if exterior noise levels exceed 71 dBA CNEL or interior noise levels exceed 45 dBA CNEL. These mitigation measures may include, but are not limited to, installation of temporary vertical sheeting at sensitive points to provide greater noise attenuation and further limitations to the construction schedule.
53. All residential units located within ~~2,000~~ 500 feet of the construction site shall be sent a notice regarding the construction schedule of the proposed project. A sign, legible at a distance of 50 feet shall also be posted at the construction site. All notices and the signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.
54. A "noise disturbance coordinator" shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and would be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within ~~1,000~~ 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.

POPULATION AND HOUSING

No Mitigation Measures are required.

PUBLIC SERVICES

55. Project building plans shall include the submittal of a plot plan for approval by the Los Angeles Fire Department either prior to the recordation of the final map or the approval of a building permit. All structures shall be within 300 feet of an approved fire hydrant.
56. The Applicant shall consult with the Fire Department and incorporate fire prevention and suppression features appropriate to the design of the project.
57. Definitive plans and specifications shall be submitted to the Fire Department and requirements for necessary permits satisfied prior to commencement of any portion of the project.
58. Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.
59. Plot plans indicating access driveways and roads and turning areas shall be reviewed and approved by the Fire Department, prior to the issuance of a building permit.
60. During the construction phase, emergency access shall remain clear and unobstructed.
61. The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles (C.P.C. 19708).
62. All access roads, including fire lanes, shall be maintained in an unobstructed manner, removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code.
63. Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot, unless otherwise approved.
64. The project shall comply with all applicable State and local Codes and Ordinances found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles.
65. During the project's construction phase, the Applicant shall ensure adequate through access and emergency access to adjacent uses.

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66. The Applicant shall consult with the Police Department and comply with recommended security features for the construction site(s), including security fencing, locked entrances, lighting, and the use of a 7-day, 24-hour security patrol.
67. Upon completion of the project, the Applicant shall provide the Central Division Commanding Officer with a diagram of each portion of the property including access routes and other information that might facilitate police response, as requested by the LAPD.
68. The applicant shall provide project plans to the LAPD Crime Prevention Unit, to determine any additional crime prevention and security features appropriate to the design of the project. Any additional design features identified by the LAPD Crime Prevention Unit shall be incorporated into the project's final design and to the satisfaction of LAPD, prior to issuance of a Certificate of Occupancy for the project.
69. The project shall incorporate design guidelines relative to security, semi-public and private spaces, which may include, but not be limited to, access control to buildings, secured parking facilities, walls/fences with key systems, well illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas and provision of security guard patrol throughout the project site if needed. The applicant is referred to Design Out Crime Guidelines: Crime Prevention Through Environmental Design (CPTED) published by the Los Angeles Police Department's Crime Prevention Section (~~located at Parker Center, 50 North Los Angeles Street, Room 818, Los Angeles, (213) 485-3134~~ located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000). The CPTED operates on three key concepts:
- Natural surveillance: The placement of physical features, activities, and people in a way that maximizes visibility.
 - Natural access control: Restricting or encouraging people to come into a space through the placement of entrances, exits, fencing, landscaping, and lighting.
 - Territorial reinforcement: The use of physical attributes to define ownership and separate public and private space.
70. The Applicant shall pay fees related to capital acquisitions and improvements in effect at the time of building permit issuance in accordance with California Government Code Section 65995.
71. The project Applicant shall carry out one or more of the following: (1) dedicate additional parkland such that the project would provide a total of three acres per 1,000 project residents; (2) pay in-lieu fees for any land dedication requirement shortfall; or (3) provide onsite improvements equivalent in value to said in-lieu fees.
72. The applicant shall pay per capita mitigation fees in accordance with the requirements of the Los Angeles Department of Public Libraries.

RECREATION

No Mitigation Measures are required.

TRANSPORTATION AND TRAFFIC

No Mitigation Measures are required.

UTILITIES AND SERVICE SYSTEMS

73. The Applicant shall comply with City ordinances limiting connections to the City sewer system, in accordance with City Bureau of Sanitation procedures.
74. The Applicant shall install low-flow water fixtures and further encourage reduction of water consumption to minimize wastewater flow to the sewer system, in accordance with City water conservation requirements.
75. Any required connections or mains shall be designed by a registered civil engineer and approved by the Los Angeles Department of Public Works, Bureau of Engineering. Any construction within the public right-of-way shall be approved by the Los Angeles Department of Transportation.
76. Prior to the issuance of a building permit, the applicant shall consult with LADWP to identify feasible and reasonable measures that reduce water consumption per City adopted ~~UBC~~ California Building Code requirements.
77. The project shall incorporate Phase I of the City of Los Angeles Emergency Water Conservation Plan.
78. The project shall comply with any additional mandatory water use restrictions imposed as a result of drought conditions.
79. Automatic sprinkler systems shall be installed to irrigate landscaping during morning hours or during the evening to reduce water losses from evaporation. Sprinklers shall be reset to water less often in cooler months and during the rainfall season, so that water is not wasted in excessive landscape irrigation.
80. Prior to issuance of building permits, the Applicant shall pay any appropriate fees imposed by the Building and Safety Department. A percentage of building permit fees is contributed to the fire hydrant fund, which provides for citywide fire protection improvements.
81. The Applicant shall implement a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction.
82. In order to reduce the deposition of construction materials at solid waste landfills serving the City of Los Angeles, the grading contractor shall identify suitable private sites that accept all fill and earth materials for re-use. Sites in the City currently accepting construction/demolition debris include Browning Ferris Industries Recycling and Transfer Station and Mission Road Recycling and Transfer Station. Documentation of which site(s) is used shall be provided to the Bureau of Engineering, prior to the issuance of haul route permits.
83. A Source Reduction and Recycling Plan (SRRP) shall be developed by the ~~Homeowners Association~~ Applicant to the satisfaction of the Bureau of Engineering and Department of Sanitation. This plan shall identify methods to promote recycling and re-use of materials, as well as safe disposal consistent with the policies

and programs contained in the City's Source Reduction and Recycling Element and the City's Solid Waste Management Policy Plan. The SRRP shall provide tenants and occupants with the means to recycle and compost materials in a manner that is practical and accessible. Specifically, the SRRP shall include a statement describing the methods by which the designated recyclables shall be separated from the waste stream, collected, and stored to facilitate transportation of these materials to a recycler or hauler providing such services. The SRRP shall identify an adequate storage area for collection and removal of recyclable materials within the project and establish standards for collection/storage of recyclable, and green waste (if applicable), materials.

84. The proposed residential buildings shall be designed to be permanently equipped with clearly marked, durable, source sorted recyclables bins to facilitate the separation and deposit of recyclable materials.
85. Primary collection bins shall be designed to facilitate mechanized collection of recyclable wastes for transport to on- or off-site recycling facilities.
86. The ~~Homeowners Association~~ Applicant shall coordinate with the City of Los Angeles to continuously maintain in good order for the convenience of residents clearly marked, durable and separate bins in the same location to facilitate the commingled recyclables and deposit of recyclable or commingled waste metal, cardboard, paper, glass, and plastic; to maintain accessibility to such bins at all times; and to require waste haulers to utilize local or regional material recovery facilities as feasible and appropriate.
87. The Applicant shall comply with the provisions of City of Los Angeles Ordinance No. 171687 with regard to all new structures constructed as part of the proposed project.

MANDATORY FINDINGS OF SIGNIFICANCE

See above mitigation measures.

I. INTRODUCTION

PROJECT INFORMATION

Project Title: The Alexan Project
ENV-2006-6302-MND-REC 1

Project Location: 850 S. Hill Street
Los Angeles, CA 90014

Project Applicant: Maple Multi-Family Land CA, L.P.
5790 Fleet Street, Suite 140
Carlsbad, CA 92008

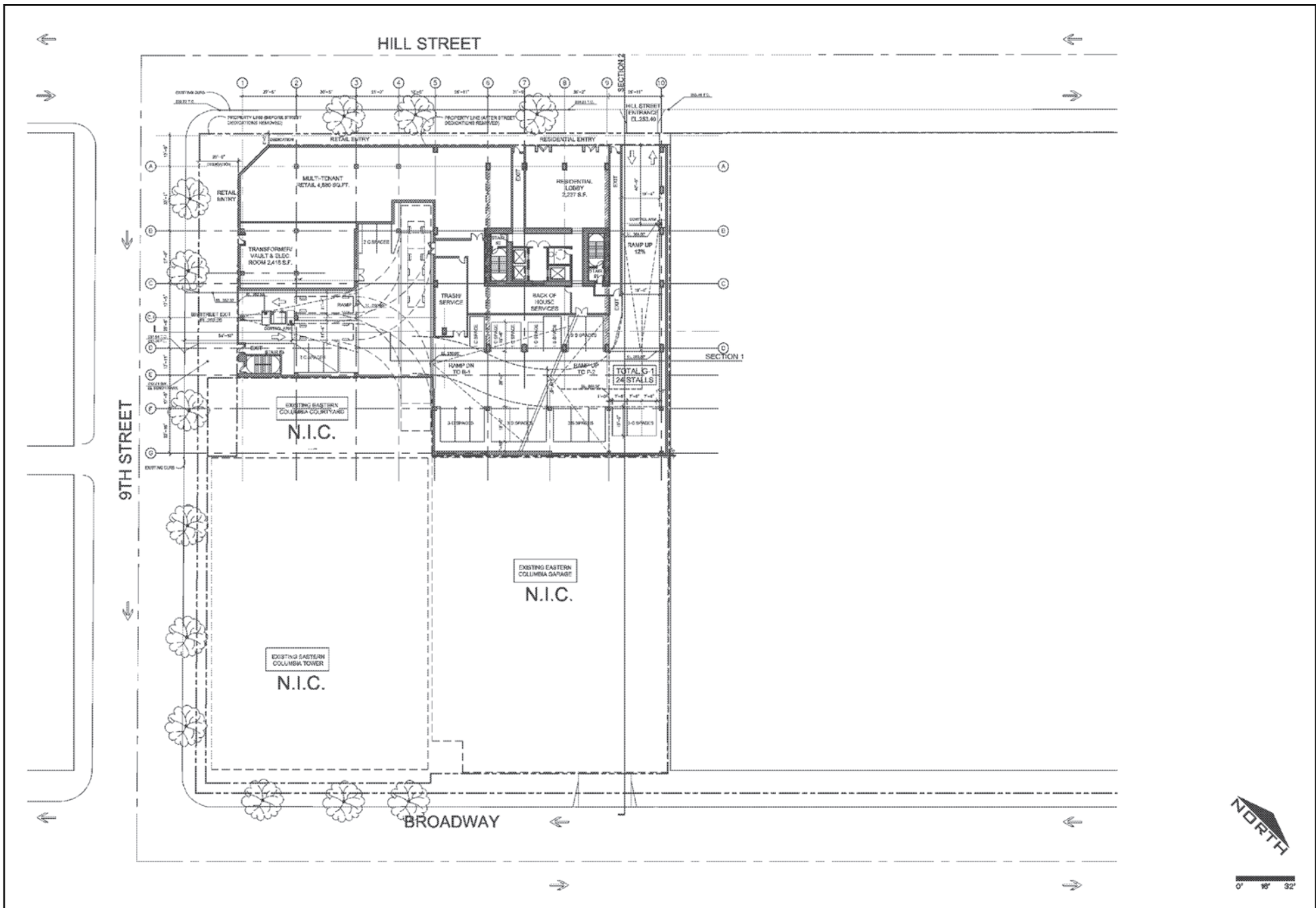
Lead Agency: City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 721
Los Angeles, CA 90012

PROJECT SUMMARY

In 2007, a mixed-use high-rise project containing 167 residential condominium units and 7,107 square feet of lobby/retail space within 190,902 square feet of floor area was analyzed in the adopted Initial Study/Mitigated Negative Declaration (ENV-2006-6302-MND) (“2007 IS/MND”). The Project was approved for 158 residential condominium units and 5,780 square feet of ground floor commercial uses in case numbers ZA-2006-6350-YV-ZAA-SPR and VTT-66505 (“Approved Project”). The Approved Project would achieve a maximum height of 246 feet, or 21-stories with 2 subterranean parking levels. A total of 245 parking spaces were approved, with no bicycle parking. Access to parking would be provided off of Hill Street and 9th Street. The Approved Project would also provide a total of 17,625 square feet of open space.

The analysis presented in this Addendum evaluates the environmental impacts associated with the modifications to the Project as analyzed in the 2007 IS/MND, which proposed 167 joint live/work condominium units in a 21-story structure (17 residential levels, three above ground parking levels and inclusive of one story of mechanical operations), two subterranean parking levels and 7 commercial condominium units with 4,880 square feet of ground floor retail. For purposes of the analysis presented in this Addendum, the Project that was analyzed in the 2007 IS/MND is referred to herein as the “Original Project.” The Original Project, as analyzed in the 2007 IS/MND, would include 259 parking spaces, including 9 for guests and none for the retail use. The ground level plan for the Original Project is depicted in Figure I-1. Elevations of for the 2007 IS/MND are depicted in Figure I-2 and I-3.

The Applicant proposes to modify the Approved Project to construct a 27-story (320 feet in height above grade) mixed-use project comprised of approximately 257,569 square feet of floor area, with up to 305



Source: ENV-2006-6302-MND, Figure I-5

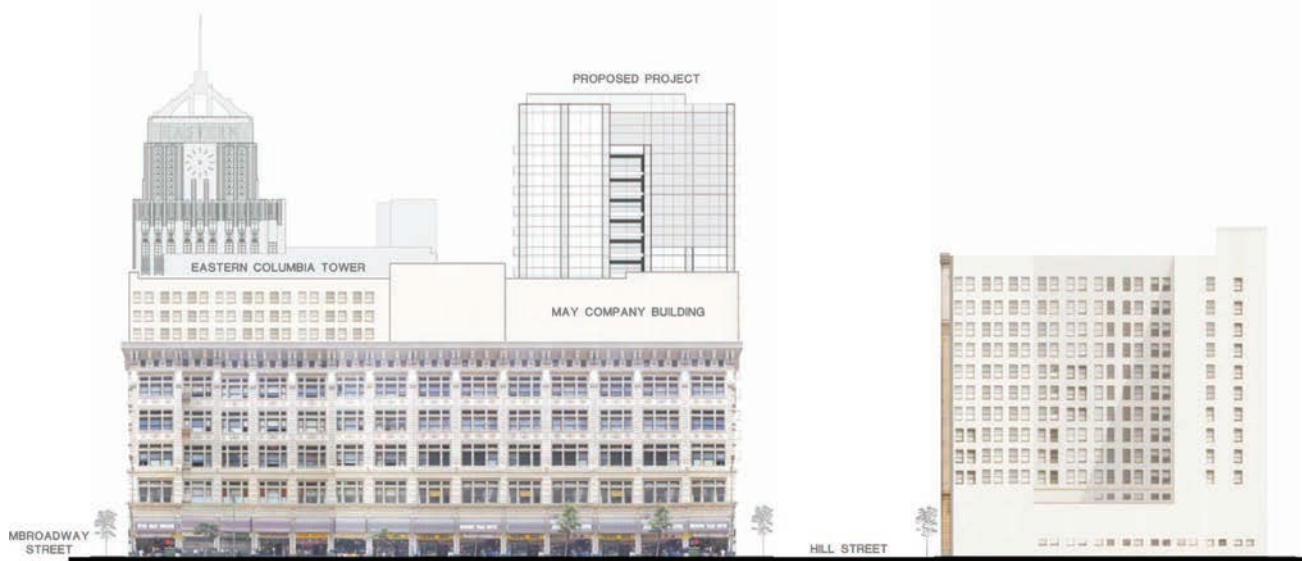


East Elevation



West Elevation

Source: ENV-2006-6302-MND, Figure I-9 and I-11



North Elevation



South Elevation

Source: ENV-2006-6302-MND, Figure I-10 and I-12

residential dwelling units, 3,500 square feet of restaurant uses and 2,671 square feet of retail uses (“Modified Project”). The Modified Project’s proposed floor area ratio (“FAR”) is 7.45:1. The allowable FAR for the Project Site is 6:1, and increases to 13:1 through a Transfer of Floor Area (“TFAR”). A total of 336 vehicle parking spaces would be provided on-site. Parking would be provided within one subterranean level, at grade and levels two through five. Level five would support additional parking behind habitable space fronting Hill Street and 9th Street. Vehicular access to the parking structure would be provided via a two-way driveway located along Hill Street and a two-way driveway located along 9th Street. The Modified Project would provide a total of 308 long-term and 34 short-term bicycle parking spaces on-site. The Modified Project would provide approximately 32,225 square feet of open space and amenity areas.

The Applicant is requesting the approval of the following discretionary actions from the Los Angeles Department of City Planning: 1) A Transfer of Floor Area Rights (TFAR) of less than 50,000 square feet; and 2) Site Plan Review (SPR). The Applicant is also requesting the CRA/LA, a designated local authority, successor agency to the Community Redevelopment Agency of the City of Los Angeles: 1) Approve the TFAR of less than 50,000 square feet, pursuant to the City Center Redevelopment Plan; and 2) Make findings pursuant to the City Center Redevelopment Plan. The Applicant would also request approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities including, but not limited to, the following: excavation, shoring, grading, foundation, haul route (for the export of approximately 500 cy of asphalt debris and approximately 30,752 cy of soil), and building and tenant improvements for the Project Site, and the Board of Public Works, Urban Forestry Division, for removal and replacement of street trees.

RATIONALE FOR PREPARING AN ADDENDUM TO THE MND

Section 15164 of the State CEQA Guidelines states that the lead or responsible agency shall prepare an Addendum to an adopted Negative Declaration if none of the conditions described in Section 15162 calling for preparation of a subsequent EIR or Negative Declaration has occurred or there are minor technical changes or additions. Pursuant to Section 15162, no subsequent EIR shall be prepared when a Negative Declaration has been adopted for a project, unless on the basis of substantial evidence, where one or more of the following occur:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The analysis presented in this Addendum evaluates the environmental impacts associated with the Modified Project and provides substantial evidence to demonstrate that any potential environmental impacts associated with the Modified Project would not cause new significant environmental impacts or an increase in the severity of previously significant impacts that were identified in the Adopted MND.¹ Based on the findings presented in the environmental analysis contained herein, there are no significant environmental impacts or an increase in the severity of previously identified significant impacts.

In addition to addressing the changes to the Modified Project, the Addendum addresses changes that have occurred with respect to the circumstances surrounding the Project. Due to the nine-years that have past since the City adopted the 2007 IS/MND, the environmental baseline conditions have changed. The baseline environmental conditions were evaluated to address whether there are substantial changes with respect to the circumstances under which the Modified Project would take place, or whether there is new information of substantial importance that could not have been known at the time of the City's approval of the Adopted MND. To this end, the traffic study was revised with new traffic counts and an updated related project list; ambient noise levels were monitored to address any changes to the ambient noise conditions in the project vicinity; new site photographs were taken to document any changes that may have occurred to the project site and surrounding properties over the past few years, and the cumulative related project list was updated to reflect the current status of related projects that have been recently approved, are proposed, or that are currently under construction. The analysis was also updated to reflect current environmental laws, regulations and planning documents and policies that have been adopted or amended since the City's approval of the 2007 IS/MND was adopted.

With respect to addressing changes to the regulatory environment it should be noted that recent amendments to the CEQA Guidelines have been adopted as it pertains to addressing parking and aesthetic impacts in a Transit Priority Area (TPA). In September 2013, Governor Brown signed Senate Bill 743 (Steinberg, 2013), which directed several changes to CEQA for projects located in TPA areas. Those

¹ *The 2007 IS/MND demonstrated no significant environmental impacts after mitigation.*

changes direct the Governor's Office of Planning and Research to develop a new approach for analyzing the transportation impacts under CEQA. Under these changes, aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. While SB 743 was not in effect at the time the 2007 IS/MND was adopted, it is now the law in California. The Modified Project is within a TPA, as there are at least two intersecting bus lines with headways of 15 minutes or less and also a fixed rail line station within ½ mile. As such, SB 743 codified in Public Resources Code Section 21099(d)(1), statutorily excludes aesthetic and parking impacts of the Modified Project from being considered significant impacts. Nevertheless, for informational purposes only, this Addendum includes an analysis of aesthetic impacts. The parking program is described and analyzed only to the extent it may have the potential to result in other associated impacts such as pedestrian safety and or traffic impacts.

ORGANIZATION OF THE INITIAL STUDY

This Addendum to the IS/MND is organized into six sections as follows:

Initial Study Checklist: This Section contains the completed IS Checklist showing the significance level under each environmental impact category.

Introduction: This Section provides introductory information such as the Modified Project title, the Project Applicant, and the lead agency for the Modified Project.

Project Description: This Section provides a detailed description of the Approved, Original and Modified Project including the environmental setting, project characteristics, related project information, and environmental clearance requirements.

Environmental Impact Analysis: This Section contains an assessment and discussion of impacts for each environmental issue identified in the Initial Study Checklist. Where the evaluation identifies potentially significant effects, mitigation measures are provided to reduce such impacts to less-than-significant levels.

Preparers of the Initial Study and Persons Consulted: This Section provides a list of consultant team members and governmental agencies that participated in the preparation of the IS/ MND Addendum.

References, Acronyms and Abbreviations: This Section includes various documents and information used and referenced during the preparation of the IS/MND Addendum, along with a list of commonly used acronyms.

II. PROJECT DESCRIPTION

A. PROJECT LOCATION

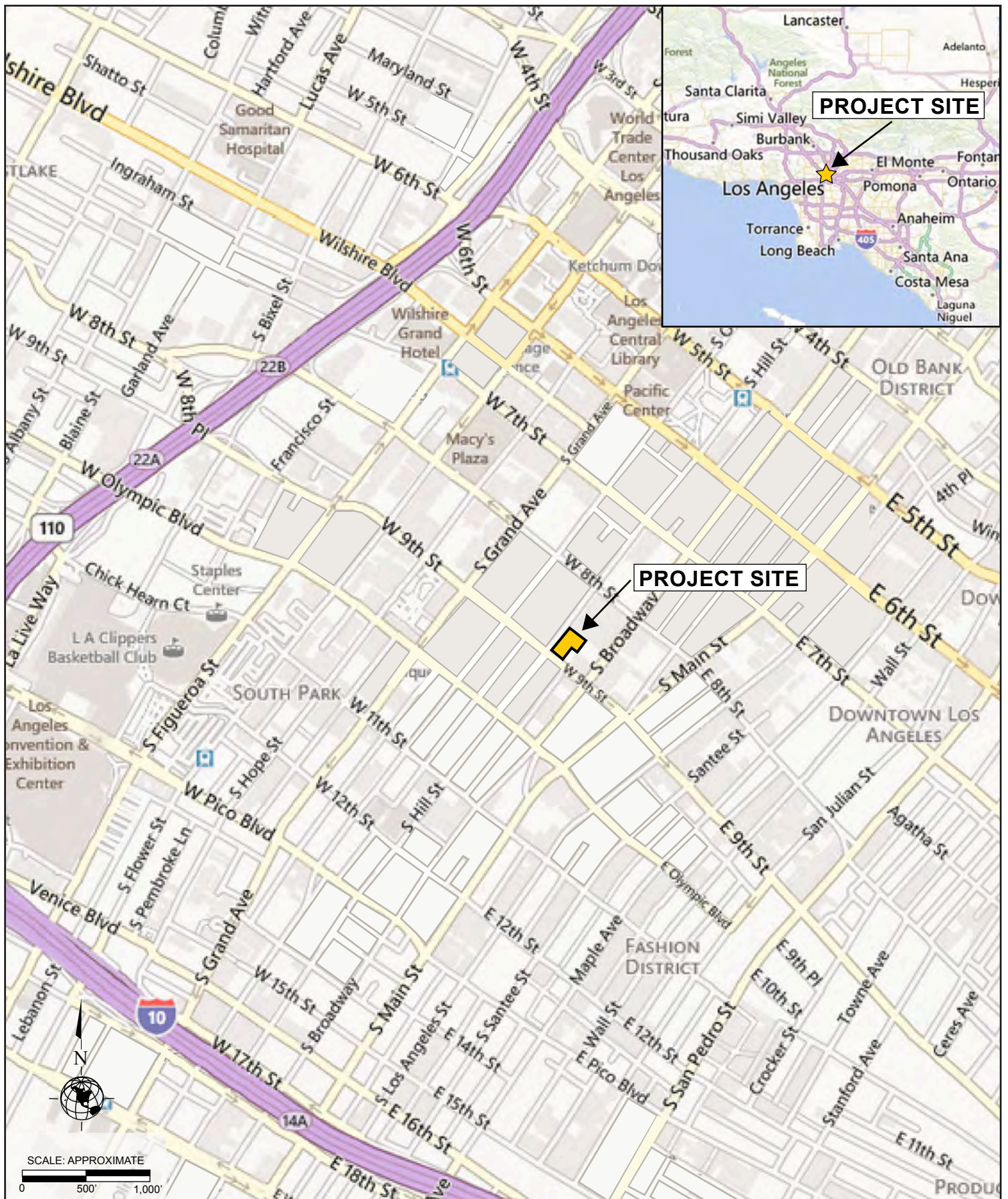
PROJECT LOCATION

The Project Site is located within the South Park and City Center/Historic Core neighborhoods of the Central City Community Plan area in Downtown Los Angeles. The Project Site includes the following addresses: 840, 844, 846, 848, 850, 852, 856 S. Hill Street; and 217, 219, 221, 223, 225 W. 9th Street, Los Angeles 90014. As shown in Figure II-1, Project Location Map, the Project Site includes five parcels and is approximately 34,595 square feet of buildable lot area (0.79 acres). The lot area post-dedication is 31,467 net square feet (0.72 acres). The Project Site's property Assessor's Parcel Number is 5144-017-037. The Project Site is generally bounded by S. Hill Street to the west; 9th Street to the south; a 13-story residential building (the Eastern Columbia building) and a 2½ story parking garage with ground floor commercial space to the east; and a 9-story commercial building (Broadway Trade Center) to the north.

REGIONAL AND LOCAL ACCESS

Primary regional access to the Project Site is provided by the Santa Monica freeway (I-10), the Harbor/Pasadena freeway (I-110/SR-110) and the Hollywood freeway (US-101). The Santa Monica freeway runs in an east-west direction south of the Project Site and the Hollywood freeway runs in an east-west direction north of the Project Site. The Harbor/Pasadena freeway runs in a north-south direction west of the Project Site. These three facilities also provide access to the Golden State (I-5) freeway to the north, to the San Bernardino (I-10) and Pomona (SR-60) freeways to the east, and to the Santa Ana (I-5) freeway to the south.

Local street access is provided by the grid roadway system surrounding the Project Site. The City's Mobility Element of the General Plan classifies street designations in the project vicinity. Hill Street is a north-south street located immediately adjacent to the western edge of the Project Site. It is a two-way street providing two travel lanes in each direction in the vicinity of the Project Site and is classified as a Modified Avenue II in the City's Mobility Element. On-street meter parking is provided with some restrictions. Broadway is a north-south street located to the east of the Project Site. It is a two-way street providing two northbound travel lanes and one southbound travel lane in the vicinity of the Project Site and is classified as a Modified Avenue II in the City's Mobility Element. On-street parking is generally allowed on both sides of the street with some restrictions. 9th Street is located immediately adjacent to the southern edge of the Project Site. It is a one-way eastbound street providing three travel lanes in the vicinity of the Project Site and is classified as a Modified Avenue III in the City's Mobility Element. On-street metered parking is provided with some restrictions. 8th Street is a one-way westbound street located to the north of the Project Site. It provides three travel lanes in the vicinity of the Project Site and is classified as a Modified Avenue III in the City's Mobility Element. On-street metered parking is provided with some restrictions.



Source: Bing Maps, 2013



Figure II-1
Project Location Map

The Project Site is located in downtown Los Angeles, which is at the hub of the regional transit network in the Los Angeles area. The project area is currently served by a total of four local and inter-city transit operators. Located immediately west of the Project Site, Hill Street carries two Metro Rapid lines (728, 794) and eight Metro Local Bus lines (2, 4, 28, 81, 83, 90, 91, 94), one Montebello line (M 50) and one Commuter Express line (CE 419) in a north-south direction. Located immediately south of the Project Site, 9th Street carries three Metro Local Bus lines (10, 66, 81), and one Commuter Express line (CE 419) in an east direction. Located east of the Project Site, Broadway carries one Metro Rapid line (745) and eight Metro Local Bus lines (2, 4, 30, 35, 38, 40, 45, 330) in a north-south direction. Located west of the Project Site, Olive Street carries one Metro Rapid line (770) and eight Metro Local Bus lines (14, 70, 71, 76, 78, 79, 96, 378), one Foothill Transit line (FT SS), one Santa Monica Big Blue Bus line (BBB R10) and two Commuter Express lines (CE 431, 437) in a north direction.

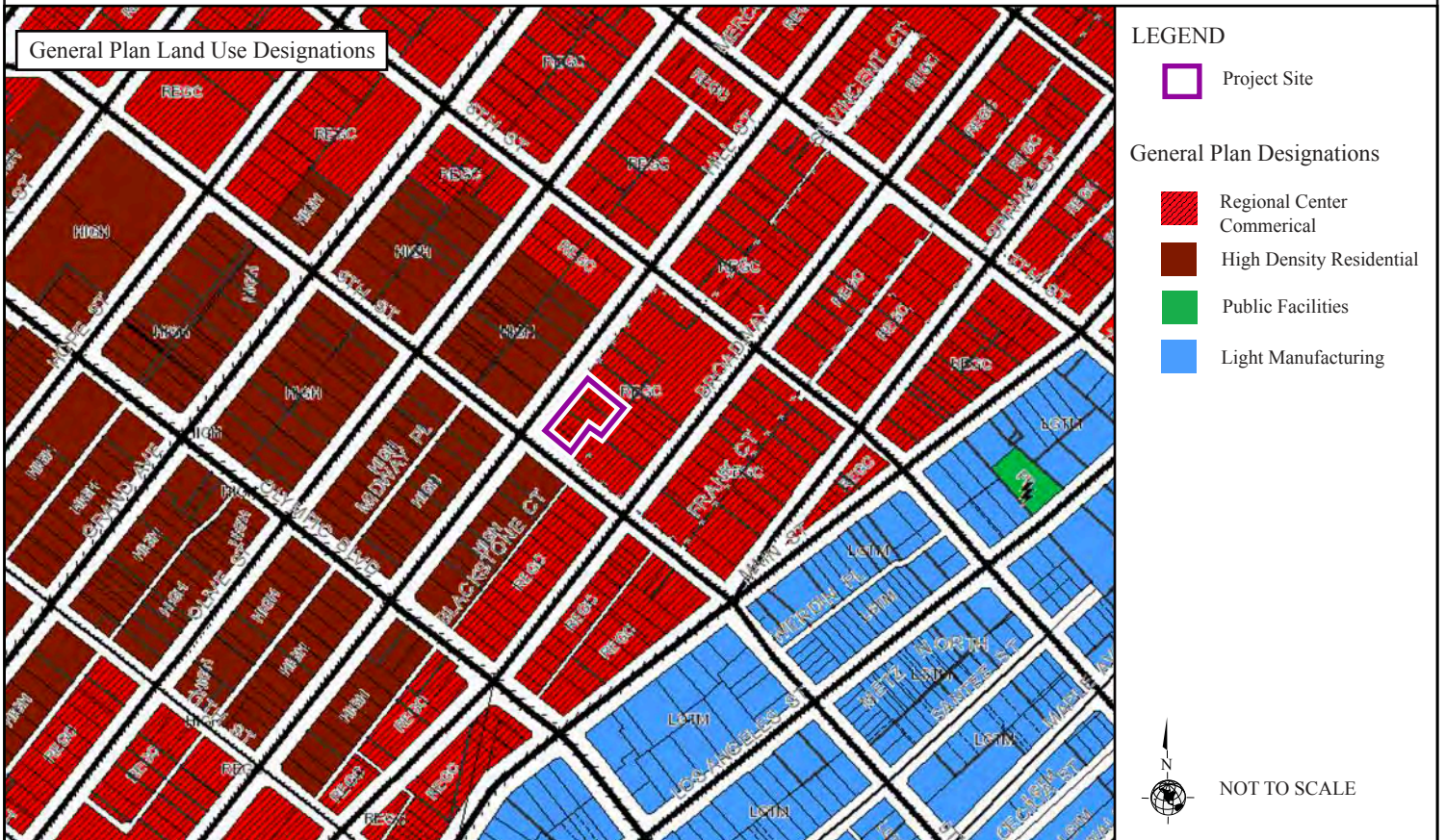
Additionally, the Project Site is approximately 0.5 mile (walking distance) southeast of the 7th Street/Metro Center Station, which provides subway and light rail services, and 0.5 mile (walking distance) south from the Pershing Square Station, which provides subway services. Subway lines from the 7th Street/Metro Center and Pershing Square Station include the Metro Purple Line and the Metro Red Line. Light rail services from the 7th Street/Metro Center Station include the Metro Blue Line and the Metro Expo Line. Both Metro stations are easily accessed by many bus lines. The Metro Purple Line provides service between Los Angeles (Wilshire/Western) and Downtown Los Angeles (Union Station). The Metro Red Line provides service between North Hollywood and Downtown Los Angeles (Union Station). The Metro Blue Line provides service between Downtown Los Angeles and Long Beach. The Metro Expo Line provides service between Downtown Los Angeles and Culver City. Due to its proximity to the 7th Street/Metro Center and Pershing Square Station, the Project Site is easily accessible and highly connected with the City of Los Angeles, the greater Los Angeles area, and Orange County.

ZONING AND LAND USE DESIGNATIONS

Central City Community Plan

The Project Site is zoned C5-4D with the land use designation of Regional Center Commercial. Height District No. 4 does not limit building height for a C5 Zone. Figure II-2, Zoning and General Plan Designations, shows the existing zoning and land use designation on the Project Site and in the surrounding area.

The Project Site is located within the Central City Community Plan (“Community Plan”) area of the City of Los Angeles. More specifically, the Community Plan identifies the Project Site as being located within the boundaries of the South Park area, which houses a mix of residential, medical, commercial, and retail uses, and within the City Center/Historic Core, which is identified as an area that “links together the Central City districts to the west that contain downtown’s mix of business, finance, cultural and sports/entertainment activities to the ‘Markets’ districts to the east that represent the large array of manufacturing, distribution, wholesale, industry-related retail, and social service



Source: Zimas, City of Los Angeles, Department of City Planning, 2015

activities; the Civic Center/Little Tokyo to the north; and South Park to the south.”¹ The Project Site is also located within several planning policy areas that have been adopted for the purposes of incentivizing development and/or providing specific development standards that are appropriate for the project area. Namely, these plans and policy areas include the following: the City Center Redevelopment project area, the Greater Downtown Housing Incentive Area, the Central City Parking Exception area, the Exception Downtown Business (Parking) District, the Central City Transfer of Floor Area Rights (TFAR) Area, the Downtown Adaptive Reuse Incentive Area, and an Enterprise Zone (the Employment and Economic Incentive Program Area).

City Center Redevelopment Plan

The Project Site is located within the City Center Redevelopment Project area. The City Center Redevelopment Plan, effective May 15, 2002, is valid until May 15, 2032.² As such, the Modified Project would need to be submitted to the Designated Local Authority (Successor Agency to the Community Redevelopment Agency of the City of Los Angeles) for review for compliance with the City Center Redevelopment Project. The purpose of the Redevelopment Plan is to implement the Community Plan’s goals for the revitalization of the Downtown Center. The Redevelopment Plan identifies overall objectives including the following: elimination of blight in the community, introduction of around-the-clock activities, creation of a Central City identity, and development of high density housing close to major employment centers.

The City Center Redevelopment Project Area identifies the Project Site as being located within the Historic Downtown Development Area. The Redevelopment Plan’s objective for the Historic Downtown Development Area is to achieve a mixed-use residential, commercial, office, cultural, recreational, entertainment, and institutional area primarily through the adaptive re-use of the large stock of structures of architectural and historic merit.³ The Modified Project is located within Height District No. 4D, which permits a base Floor Area Ratio (FAR) of 6 times the buildable area of the lot (6:1 FAR) with the ability to achieve a maximum of 13 times the buildable area of the lot through a Transfer of Floor Area (“TFAR”), per Ordinance 164307. Upon approval of this entitlement, the Modified Project would achieve a maximum FAR of 7.45:1 for a total of 257,569 square feet, which is substantially less than the 13:1, or approximately 645,723 square feet, permitted through a greater Transfer of Floor Area.

Downtown Design Guidelines

The Downtown Design Guide: City of Los Angeles (Design Guide) encourages Downtown Los Angeles to develop as a more sustainable and livable community. The focus of the Design Guide is on the relationship of buildings to the street, including sidewalk treatment, character of the building as it adjoins the sidewalk, and connections to transit. To achieve this harmony between buildings and public right-of-ways, the Design Guide provides design goals and specific requirements for the design of sidewalks and

¹ *City of Los Angeles Department of City Planning, Central City Community Plan (pg. I-7 and I-9).*

² *City of Los Angeles Community Redevelopment Agency – Los Angeles, City Center, website: http://www.crala.net/internet-site/Projects/City_Center/index.cfm, accessed March 2015.*

³ *City of Los Angeles Community Redevelopment Agency, Redevelopment Plan for the City Center Redevelopment Project, 2002.*

setbacks, ground floor treatment, parking and access, building massing and street wall, on-site open space, architectural detail, streetscape improvements, signage, and public art, and promote civic and cultural life. According to the Design Guide, the portion of W. 9th Street and S. Hill Street that border the Project Site are identified as retail streets. The design of the Modified Project is guided by the Downtown Design Guide and the Historic Downtown Los Angeles Design Guidelines. While the Historic Design Guidelines are not a City adopted plan, the Guidelines state that projects within the Historic Core should comply with the Historic Design Guidelines.

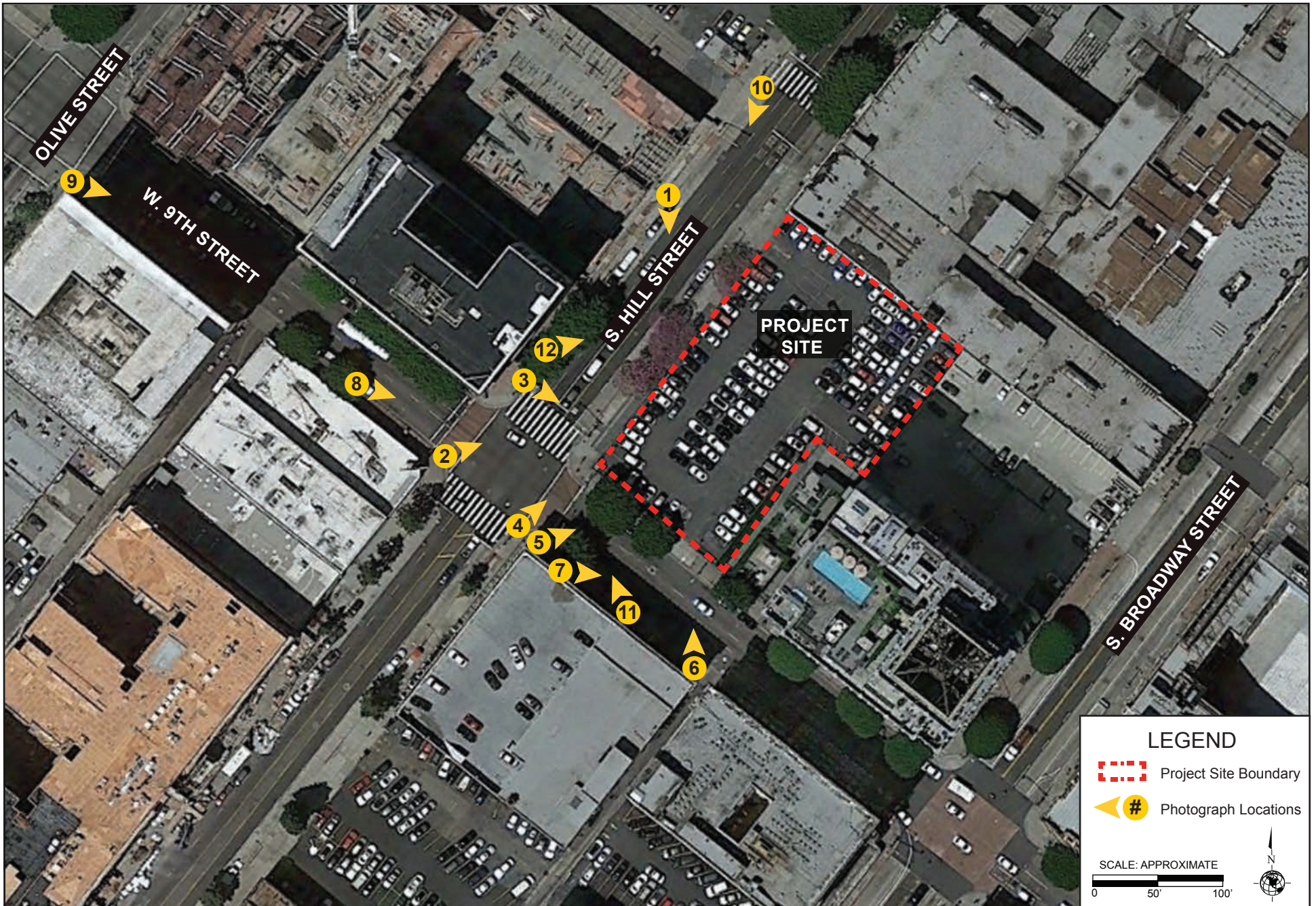
Historic Downtown Los Angeles Design Guidelines

The Historic Design Guidelines pertain to the area generally bound by the properties that front the north side of 3rd Street to the north, the properties that front the east side of Main Street to the east, the properties that front the south side of 9th Street to the south, and the properties that front the west side of Hill Street to the west. The Project Site is located on the southwestern edge of the Historic Design Guideline's defined area. The purpose of the Historical Downtown Los Angeles Design Guidelines (Historic Design Guidelines) is to aid all parties embarking upon effective preservation and adaptive reuse projects in Los Angeles' historic commercial center with design and development guidelines that help highlight and promote the historic character of the Historic Core. The Historic Design Guidelines serve as a tool to enhance economic activity and attract investment in the area by encouraging high quality, historically compatible design.

EXISTING CONDITIONS

Figure II-3, Aerial Photograph and Photograph Location Map, shows an aerial view of the Project Site, which includes a surface parking lot and identifies the location points for the site photographs shown in Figure II-4, Photographs of the Project Site, and Figure II-5, Photographs of Surrounding Land Uses. The Project Site currently includes a surface parking lot with approximately 110 striped parking spaces, as seen in Figure II-4, Photographs of the Project Site. The surface parking lot has two driveways, one located on Hill Street and one located on 9th Street. The Project Site is entirely devoid of any vegetation. There are five street trees located in the public right-of-way adjacent to the Project Site, including three mature trees (*jacaranda sp.*) on the east side of S. Hill Street and two mature street trees (*ficus sp.*) on the north side of 9th Street. The removal and placement of street trees would be subject to the review and approval of the Board of Public Works, Urban Forestry Division. Topographically, the Project Site is generally flat. The perimeter of the Project Site is secured with a metal fence and sliding gates across the driveways to limit access on-site during non-operational hours. As shown in Figure II-4, no substantial changes have occurred to the properties immediately surrounding the Project Site since the time the Project was approved.⁴ At the time the 2007 IS/MND was prepared, the Eastern Columbia building,

⁴ See ENV-2006-6302-MND, Figure I-2 through Figure I-4 for site photos of existing conditions at the time the 2006 IS/MND was prepared.



Source: Google Earth, Aerial View, 2015



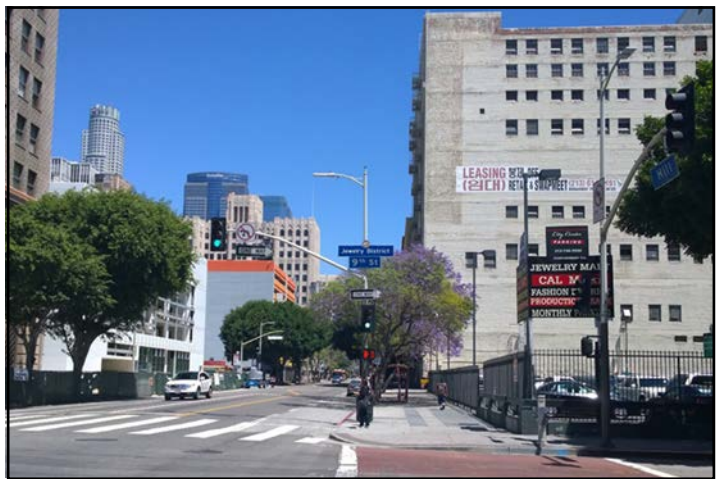
View 1: From the west side of S. Hill Street, looking south at the Project Site.



View 2: From the southwest corner of the intersection of S. Hill Street and W. 9th Street, looking northeast at the Project Site.



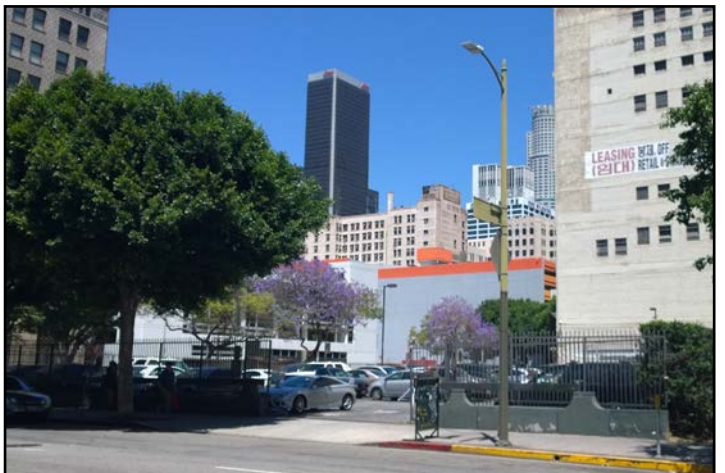
View 3: From the northwest corner of the intersection of S. Hill Street and W. 9th Street, looking southeast at the Project Site.



View 4: From the southeast corner of the intersection of S. Hill Street and W. 9th Street, looking northeast at the Project Site.



View 5: From the southeast corner of the intersection of S. Hill Street and W. 9th Street, looking northeast at the Project Site.



View 6: From the south side of W. 9th Street, looking north at the Project Site.

Sources: Parker Environmental Consultants, 2015



Figure II-4
Photographs of the Project Site
Views 1-6

located immediately to the east of the Project Site was undergoing construction to convert the building into 147 Joint Living and Work Quarters and seven commercial condominium units. Additionally, a 2½ level above ground/two level below ground parking structure, located on the north side of the Eastern Columbia building and immediately east of the Project Site, was under construction. As such, the Project Site was being utilized as a temporary construction staging area for those construction activities. As these related projects were anticipated and discussed in the prior 2007 IS/MND's cumulative impact analysis, the construction and operation of these related projects does not present a substantial change to the environment.

SURROUNDING LAND USES

The properties surrounding the Project Site include commercial/retail, offices, high-rise and high-density residential buildings and parking lots. Photographs of the land uses immediately surrounding the Project Site are provided in Figure II-5, Photographs of the Surrounding Land Uses. To the west of the Project Site, across S. Hill Street, is a 12-story commercial building, approximately 160 feet in height (the Coast Federal Savings building), and a 33-story mixed-use residential tower, approximately 375 in height feet, with a five level parking structure (the Level building) (See Figure II-5, Views 9, 10 and 11). Properties to the west are zoned [Q]R5-4D (Multiple Dwelling Zone). The General Plan land use designation is High Density Residential. To the east of the Project Site is a 13-story residential building, approximately 264 feet in height (the Eastern Columbia building), and a 2½ story parking structure with ground floor commercial space. (See Figure II-5, View 7, 8 and 9). Properties to the east are zoned [Q]C5-4D-CDO (Commercial Zone). The General Plan use designation is Regional Commercial. To the immediate north of the Project Site is a 9-story commercial building, approximately 155 feet in height (the Broadway Trade Center, see Figure II-5, View 12). Properties to the north are zoned C5-4D (Commercial Zone). The General Plan land use designation is Regional Commercial. To the south of the Project Site, across from W. 9th Street, is a four-story commercial and parking mixed-use building approximately 76 feet in height (the May Company garage) and a one story commercial building (See Figure II-5, View 8 and 10). Properties to the south are zoned [Q]R5-4D (Multiple Dwelling Zone). The General Plan land use designation is High Density Residential. Similar to the Project Site, properties immediately surrounding the Project Site are permitted a 6:1 FAR with the ability to achieve a Transfer of Floor Area, as allowed by the Los Angeles Municipal Code and the City Center Redevelopment Plan.

Since the preparation of the 2007 IS/MND, two recently constructed mixed-use residential developments have recently been built in the project area and are now operational. The Level building, located approximately one block directly west of the Project Site at 888 S. Olive Street includes a 33-story, 375-foot high residential tower with 303 condominium units, ground floor retail space, and an attached five-level parking structure (City Case No. ZA 2013-1013(MCUP)(ZV)(SPR)) (See related project No. 73 of Table II-5). The Hanover building, located approximately one block southwest of the Project Site at 301 W. Olympic Boulevard, is a seven-story wood framed stucco podium mixed-use project consisting of 263 residential apartment units and 14,500 square feet of ground floor commercial space (See related project No. 68 of Table II-5).

Additionally, it is relevant to note that one property located at 826 S. Olive Street, to the west across S. Hill Street, has been approved for a 50-story mixed-use residential building that would include up to 589 residential condominiums and 4,500 square feet of retail space (See related project No. 26 of Table II-5) and is currently undergoing site clearing. The Broadway Trade Center, immediately north of the Project Site, will be undergoing future renovations, which would consist of a net addition of floor area including a total of 147,267 square feet of leasable space, with 122,050 square feet to be used as office space and 25,217 square feet to be used as restaurant space (See related project No. 84 of Table II-5).



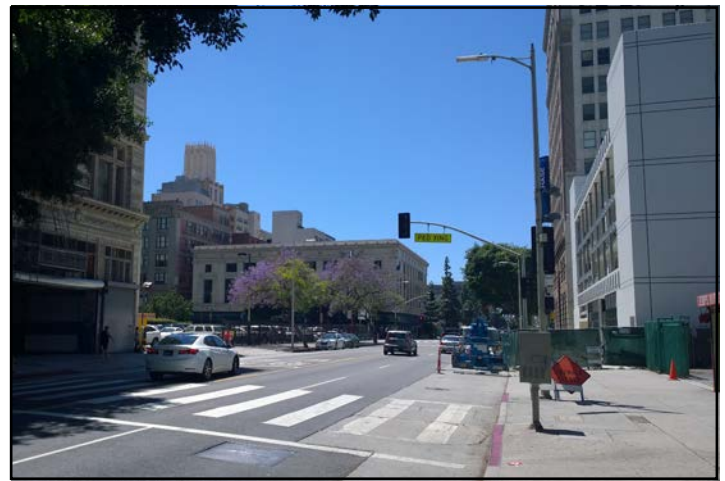
View 7: From the south side of W. 9th Street, looking east at the Eastern Columbia Building to the east of the Project Site.



View 8: From the south side of W. 9th Street, looking east of the Project Site.



View 9: From the southeast corner of Olive Street and W. 9th Street, looking east of the Project Site.



View 10: From the west side of S. Hill Street, looking south of the Project Site.



View 11: From the south side of W. 9th Street, looking northwest at the Coast Federal Savings Building to the west of the Project Site.



View 12: From the west side of S. Hill Street, looking northeast at the Broadway Trade Center to the north of the Project Site.

Source: Parker Environmental Consultants, 2015



Figure II-5
Photographs of the Surrounding Land Uses
Views 7-12

II. PROJECT DESCRIPTION

B. PROJECT CHARACTERISTICS

APPROVED PROJECT

Vesting Tentative Tract Map No. 66505 and ZA-2006-6350-YZ-ZAA-SPR

On January 2, 2007, the Deputy Advisory Agency conditionally approved Vesting Tentative Tract Map No. 66505 (“VTT-66505”)(Case No. ZA-2006-6350-YV-ZAA-SPR)⁵ to permit a merger and resubdivision into one lot for a new mixed-use development consisting of 158 joint live/work condominium units in a 21-story structure, with two subterranean parking level and 7 commercial condominium units with 5,780 square feet of ground floor retail as shown on revised map stamp-dated June 23, 2007 in the Central City Community Plan (“Approved Project”). The Approved Project would include 245 parking spaces, including 8 for guests and none for the retail use. On February 22, 2004 the Office of Zoning Administration conditionally approved Case No. ZA-2006-6350-YV-ZAA-SPR, for an adjustment from Section 12.17-C and 12.17-C.2 of the Los Angeles Municipal Code to permit zero rear and side yards for levels one through three of the structure in lieu of the required 20-foot rear yard and 16-foot side-yard; and Site Plan Review. A summary of the project features under the Approved Project is provided in Table II-1.

ORIGINAL PROJECT

ENV-2006-6302-MND

The analysis presented in this Addendum evaluates the environmental impacts associated with the modifications to the Original Project, as analyzed in the adopted ENV-2006-6302-MND (“2007 IS/MND”), which proposed 167 Joint Live/Work condominium units in a 21-story structure (17 residential levels, three above ground parking levels and inclusive of one story of mechanical operations), two subterranean parking levels and 7 commercial condominium units with 4,880 square feet of ground floor retail. The Original Project would achieve a maximum height of 246 feet above grade. For purposes of the analysis presented in this Addendum, the Project that was analyzed in the 2007 IS/MND is referred to herein as the “Original Project.” The Original Project, as analyzed in the 2007 IS/MND, would include 259 parking spaces, including 9 for guests and none for the retail use. The podium and tower of the Original Project would closely abut the full height of the south façade of the Broadway Trade Center building to the north. The podium of the Original Project would abut the two-story Eastern Columbia garage and the northwest corner of the Eastern Columbia building, located to the east. The podium and tower of the Original Project would be set back from the west façade of the Eastern Columbia building by approximately 45 feet. The tower of the Original Project would be set back approximately 90 feet from the south façade of the podium. Figure II-5 and Figures II-9 through II-12 of the 2007 IS/MND depict the ground level and elevations of the Original Project, respectively. A summary of the project features for the Original Project is provided in Table III-1.

⁵ *CPC approved VTT-66505 on January 31, 2015. The ZA approved ZA-2006-6350(YV)(ZAA)(SPR) on February 22, 2007.*

**Table II-1
Summary of Project Changes**

Project Features	Approved Project (VTT 66505 and ZA-2006-6350-YV-ZAA-SPR)	Original Project (ENV-2006-6302-MND)	Modified Project	Net Change ^[a]
Floor Area				
Residential	182,895 sf	186,022 sf	251,398 sf	+65,376 sf
Commercial/Retail	5,780sf	4,880 sf	6,171 sf	+1,291 sf
Total	190,902 sf	190,902 sf	257,569 sf	+66,667 sf
FAR	6:1 ^[b]	6:1 ^[c]	7.45:1 ^[f]	+1.45 sf
Dwelling Units				
Studio	--	--	59 du	+59 du
1 Bedroom	--	100 du	183 du	+83 du
2 Bedroom	--	67 du	60 du	-7 du
3 Bedroom	--	--	3 du	+3 du
Total du	158 du	167 du	305 du	+138 du
Open Space	17,625	Proposed Open Space Not Specified	32,225 sf	+14,600 sf ^[d]
Parking				
Residential	245 stalls	259 stalls	336 stalls	+77 stalls
Commercial	--	--	--	--
Total	245 stalls	259 stalls	336 stalls	+77 stalls
Height				
Stories	21 stories	21 stories	27 stories	+6 stories
Feet Above Grade	246 ft	246 ft	320 ft	+74 ft
Level				
TFAR Request	None	None	49,999 sf	+49,999 sf
<i>Notes: du = dwelling units; sf = square feet</i> ^[a] Net change based on the difference between the Modified Project and Original Project as analyzed in the adopted 2007 IS/MND. ^[b] Based on a lot area of 31,817 square feet after dedication. ^[c] Based on a lot are of 34,595 square feet before dedication. ^[d] Net change for open space based on the difference between the Approved Project and Modified Project, as the proposed open space for the Original Project was not specified in the 2007 IS/MND. Sources: Case No. ENV-2006-6302-MND (VTT-66505, ZA-2006-6350-YV-ZAA-SPR) and RTKL, February 18, 2016.				

MODIFIED PROJECT

The Applicant proposes to modify the Original Project to construct a 27-story mixed-use development (320 feet in height above grade) with ground floor retail (“Modified Project”). Parking would be provided in one subterranean level, at grade and levels two through five. Level five would support additional parking behind habitable space fronting Hill Street and 9th Street. As shown in Table II-1, Summary of Project Changes, the Modified Project would include 305 residential units totaling approximately 251,398 square feet of residential floor area. Residential apartments would include a mix of 59 studios, 183 1-bedrooms, and 63 2-bedrooms. The Modified Project includes neighborhood serving ground-floor retail which totals up to 6,171 square feet of floor area and includes 3,500 square feet of restaurant uses and 2,671 square feet of retail uses. The commercial uses would be located on the ground floor fronting both Hill Street and 9th Street. The plot plan and ground floor plan are depicted in Figure II-6 and II-8,

respectively. The basement level and levels 2, 3-4, 5, 6, 7, 27 and the roof plan are depicted in Figures II-7 and II-9 through II-15, respectively.

A summary of the differences between the Modified Project, the Original Project, and the Approved is provided in Table II-1. As shown in Table II-1, the Modified Project, as compared to the Original Project, results in a net increase of 138 dwelling units, a net increase of 1,291 square feet of retail floor area, and 77 additional parking spaces. The Modified Project would include a TFAR request of 49,999 square feet. The Modified Project would include an increase of 66,667 square feet of floor area and an increase of 6 stories in building height (approximately 74 feet). Similar to the Original Project, the Modified Project would include two ingress/egress driveways; one located on 9th Street and one located on S. Hill Street.

FLOOR AREA

The Project Site occupies 34,595 square feet (0.79 acres) of lot area. The lot area post-dedication is 31,467 net square feet (0.72 acres). The Modified Project is located within Height District No. 4D, which permits a 6:1 FAR with the ability to achieve a maximum of 13 times the buildable area of the lot through a Transfer of Floor Area (TFAR) per Ordinance 164307. Upon approval of this entitlement, the Modified Project would achieve a maximum FAR of 7.45:1 for a total of 257,569 square feet, which is substantially less than the 13:1, or approximately 645,723 square feet, permitted through a greater TFAR. Pursuant to the LAMC Sec. 14.5.3 the floor area of a building is divided by the lot area of the lot (prior to any dedications) upon which it is located.

RESIDENTIAL DENSITY & UNIT COUNT

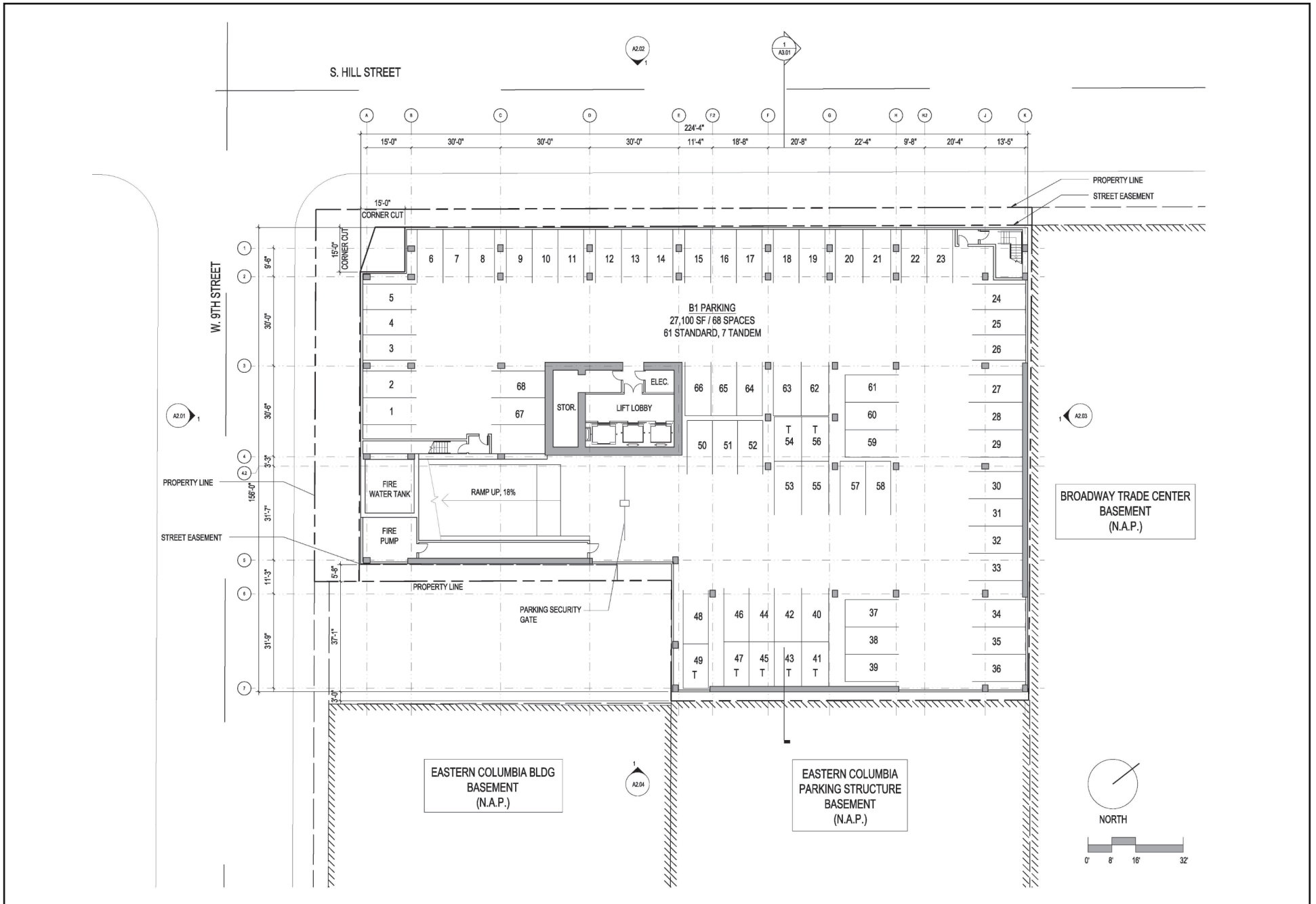
Pursuant to 12.22 C.3 Incentives to Produce Housing in the Greater Downtown Housing Incentive Area, there is no residential density limitation at the Project Site, unlike areas outside of Downtown. The Project proposes 305 units of varied sizes and habitable room count.

BUILDING HEIGHT

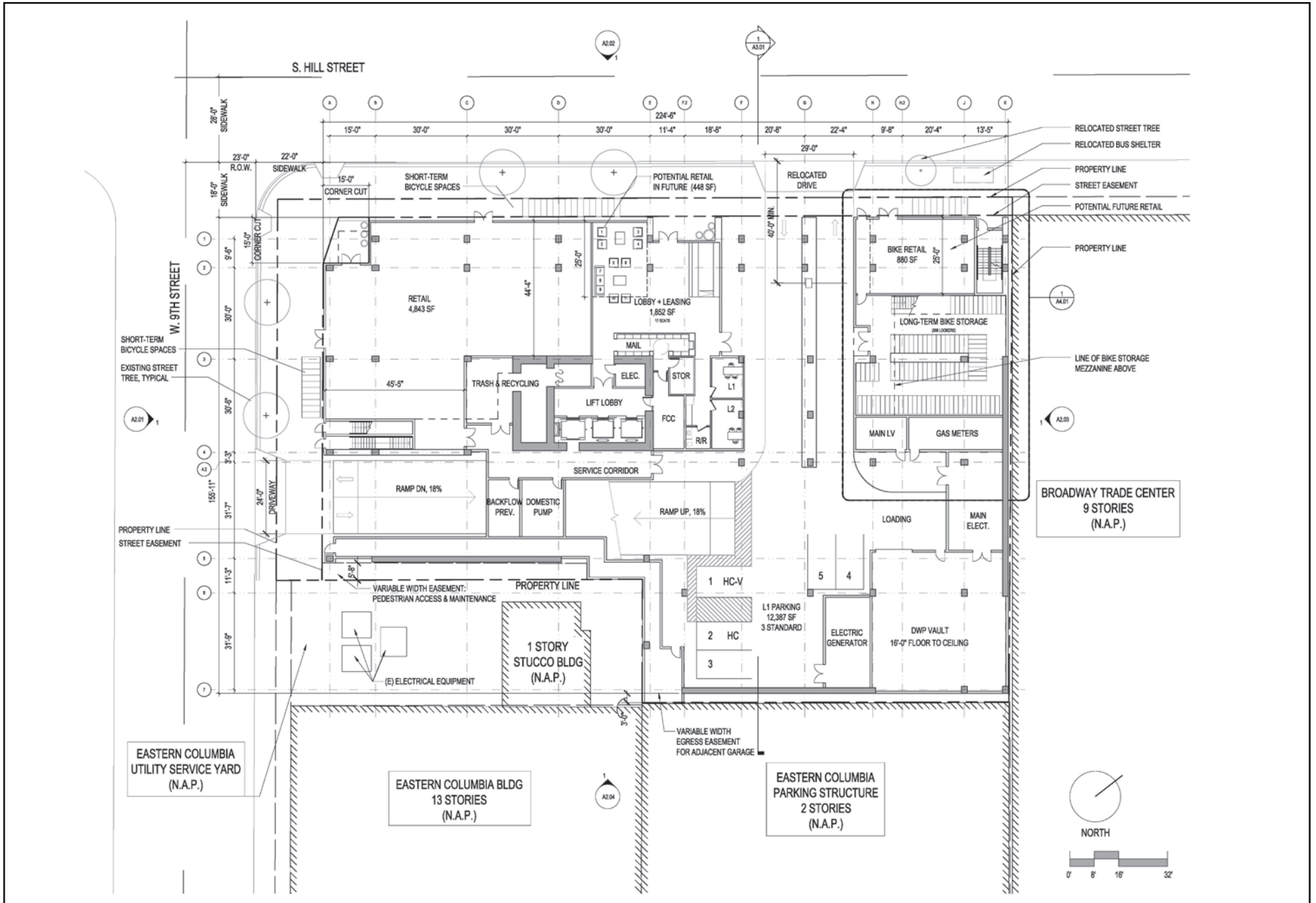
There is no height restriction for the Project Site. The height is limited by the FAR as discussed above. The proposed 27-story building is planned for a maximum roof height of approximately 320 feet above grade at the tower and 76 feet at the 7th level. Elevations depicting the scale and massing of the proposed structure are depicted in Figure II-16 through Figure II-19. Contextual elevations of the Modified Project are depicted in Figure II-20 and II-21. A building section of the Modified Project is depicted in Figure II-22.

ARCHITECTURAL FEATURES

The Modified Project consists of a 27-story building with multi-family housing provided in levels five through 27. The Modified Project is contemporary in design and utilizes modern materials including concrete, glass, aluminum panels, and perforated metal. Parking would be provided in one subterranean level, at grade and levels two through five. Level five would support additional parking behind habitable



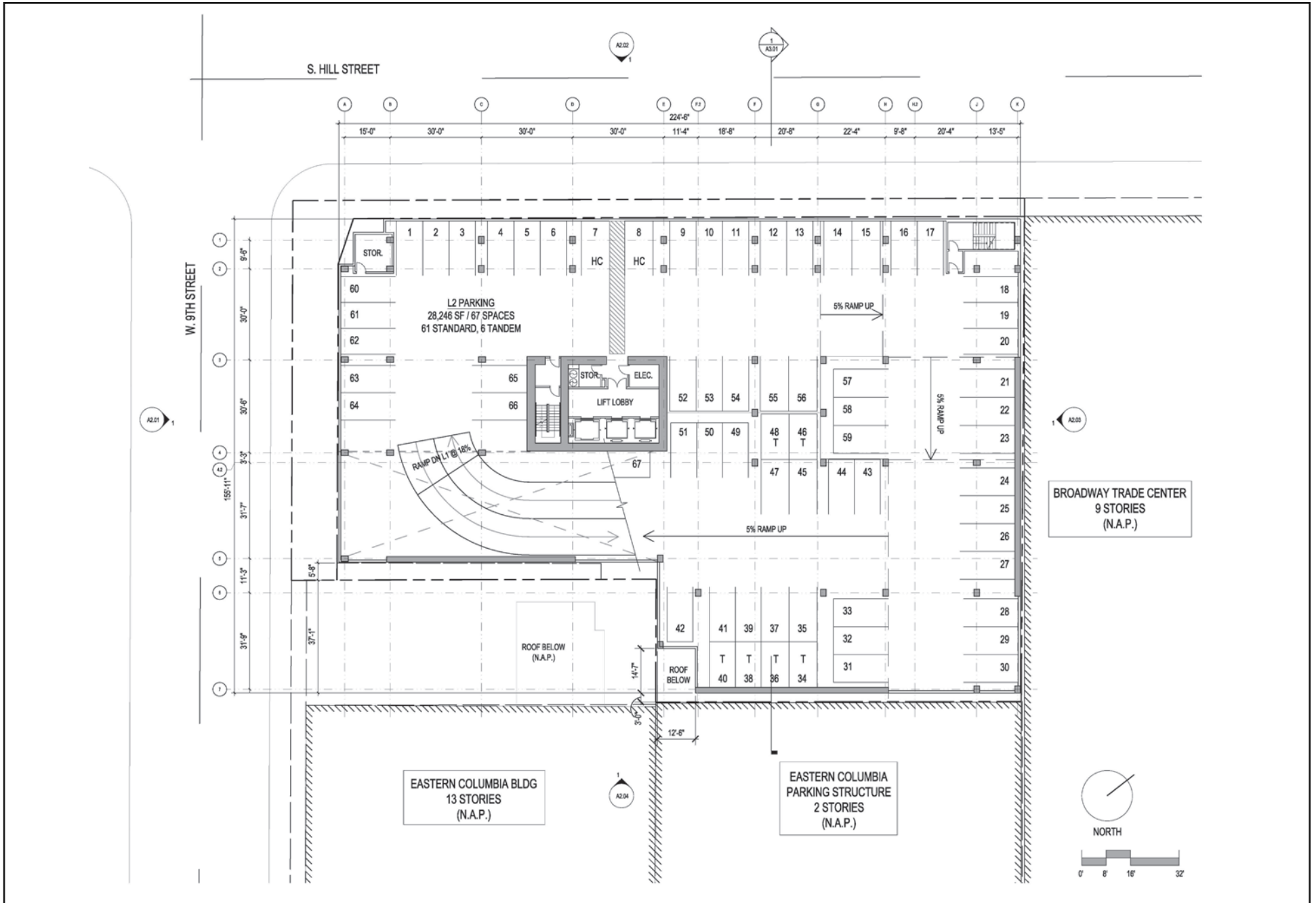
Source: RTKL, February 18, 2016



Source: RTKL, February 18, 2016



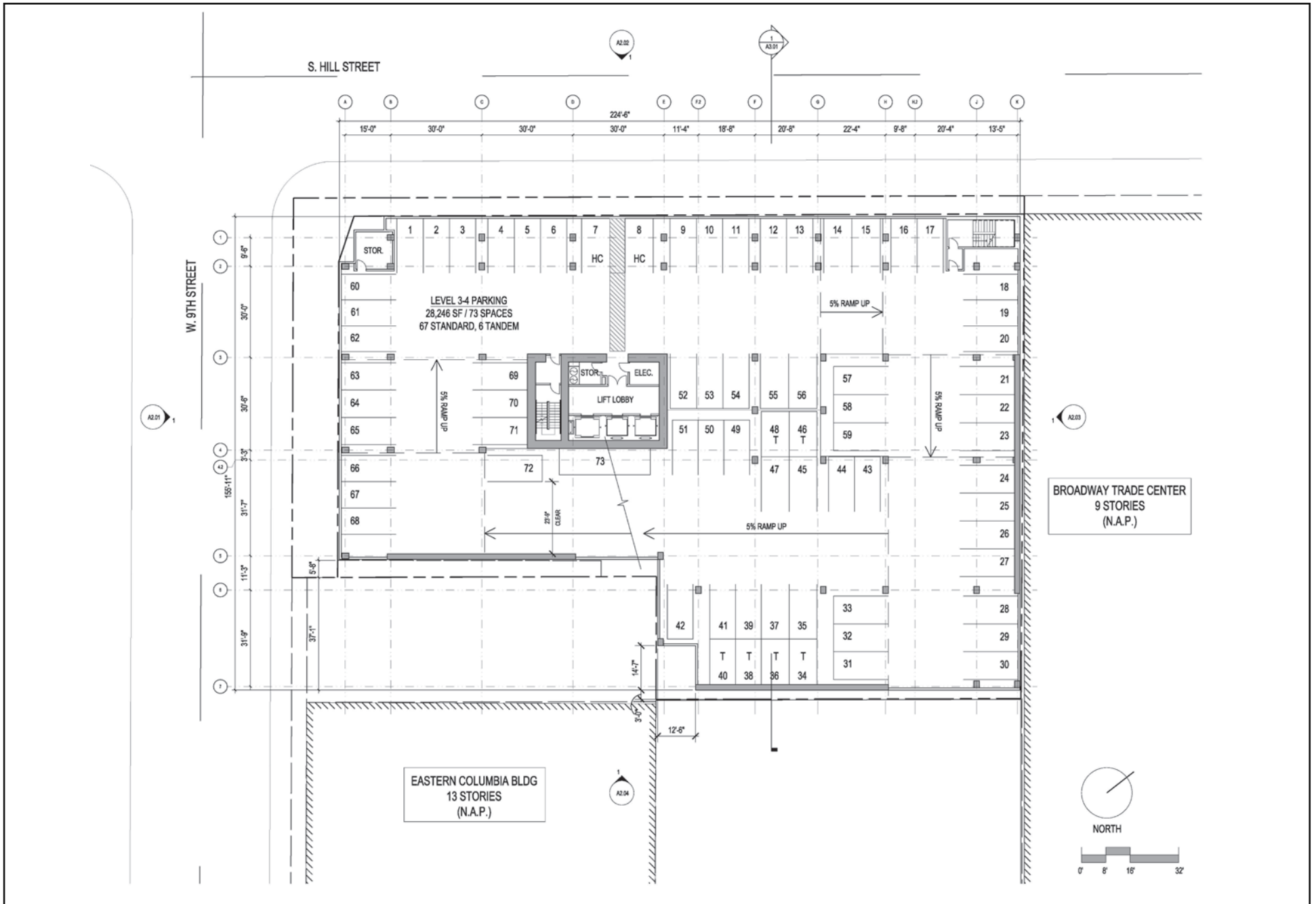
Figure II-8
Ground Floor Plan



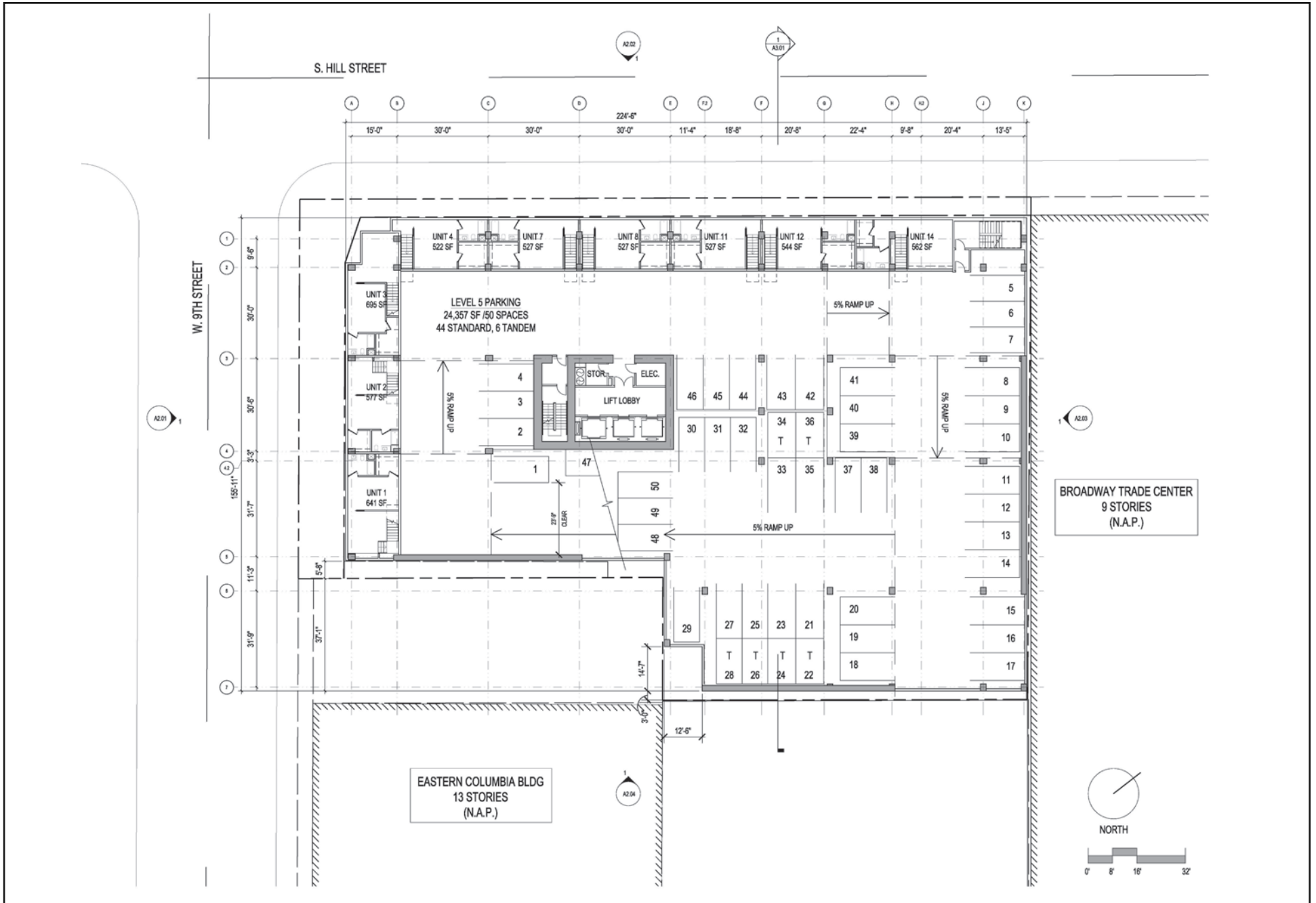
Source: RTKL, February 18, 2016



Figure II-9
Level 2 Plan

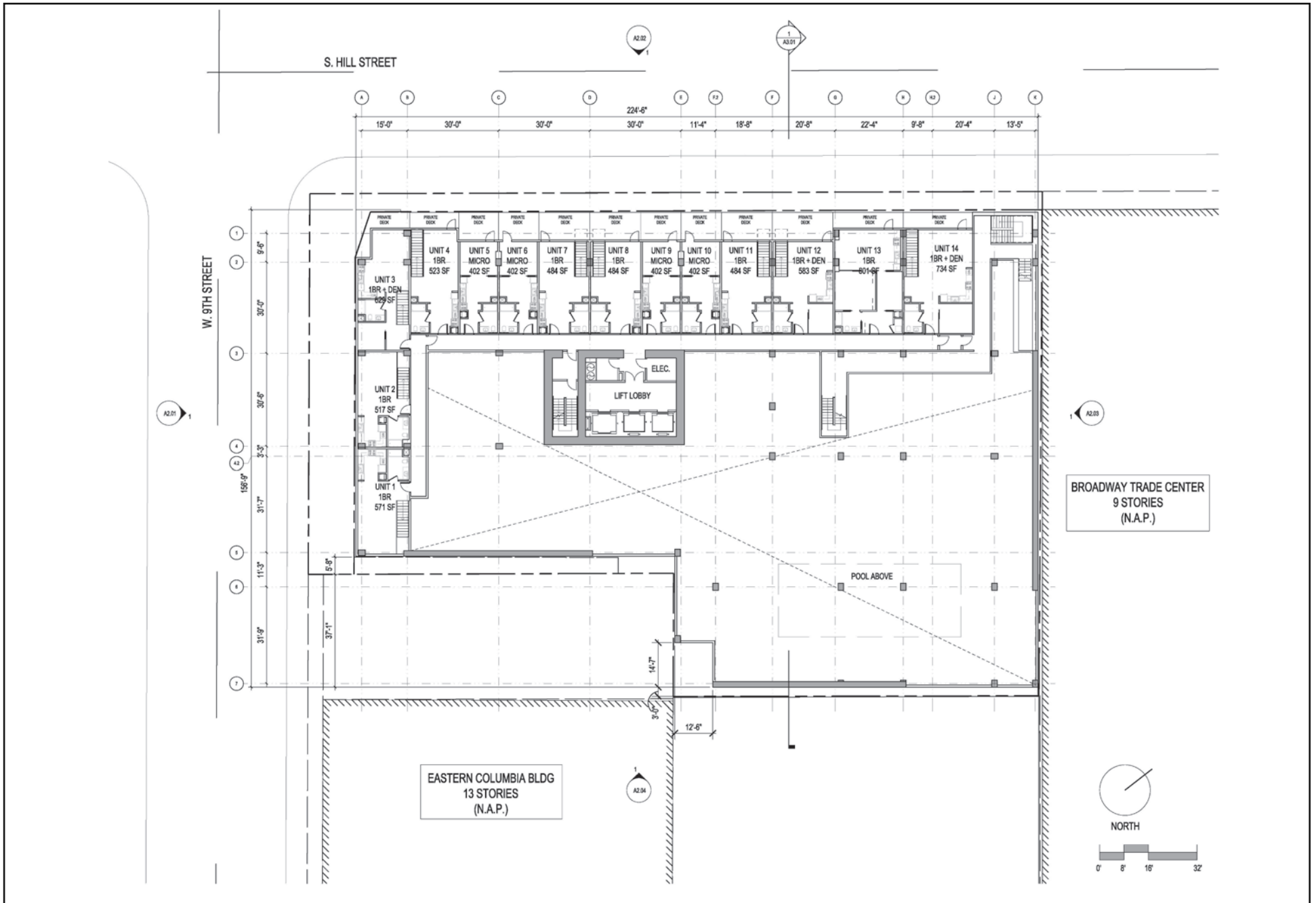


Source: RTKL, February 18, 2016



Source: RTKL, February 18, 2016

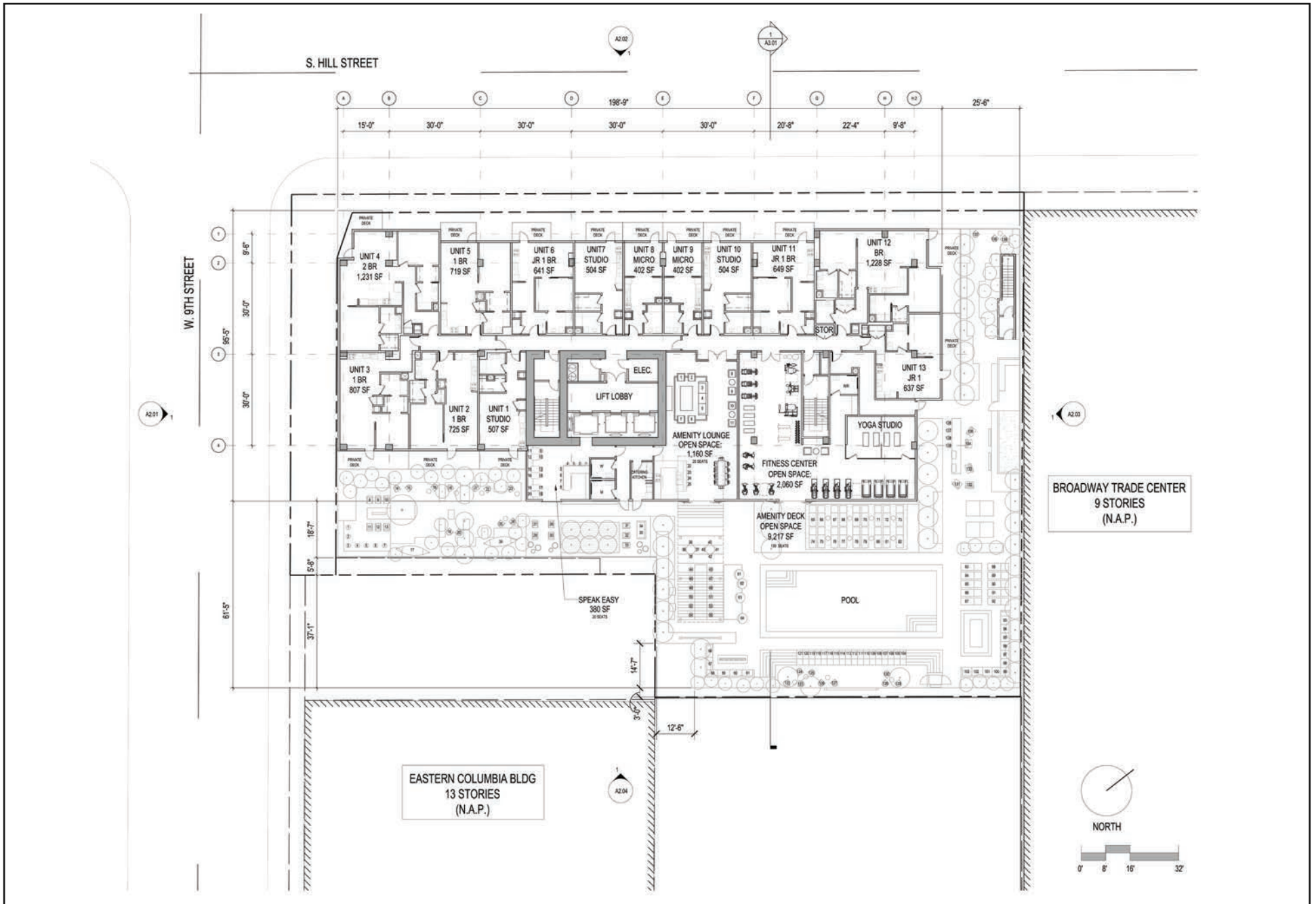
Figure II-11
Level 5 Plan



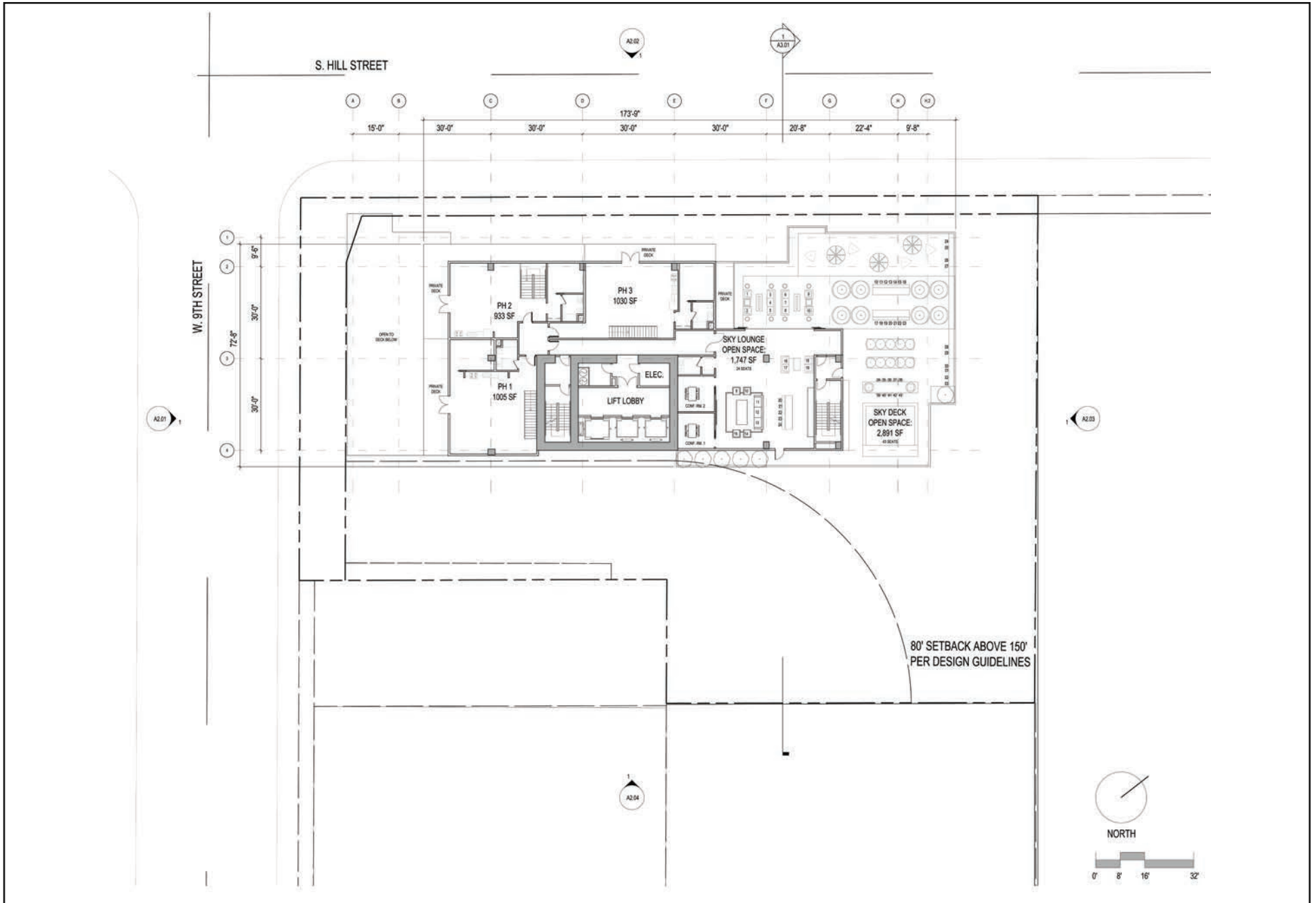
Source: RTKL, February 18, 2016



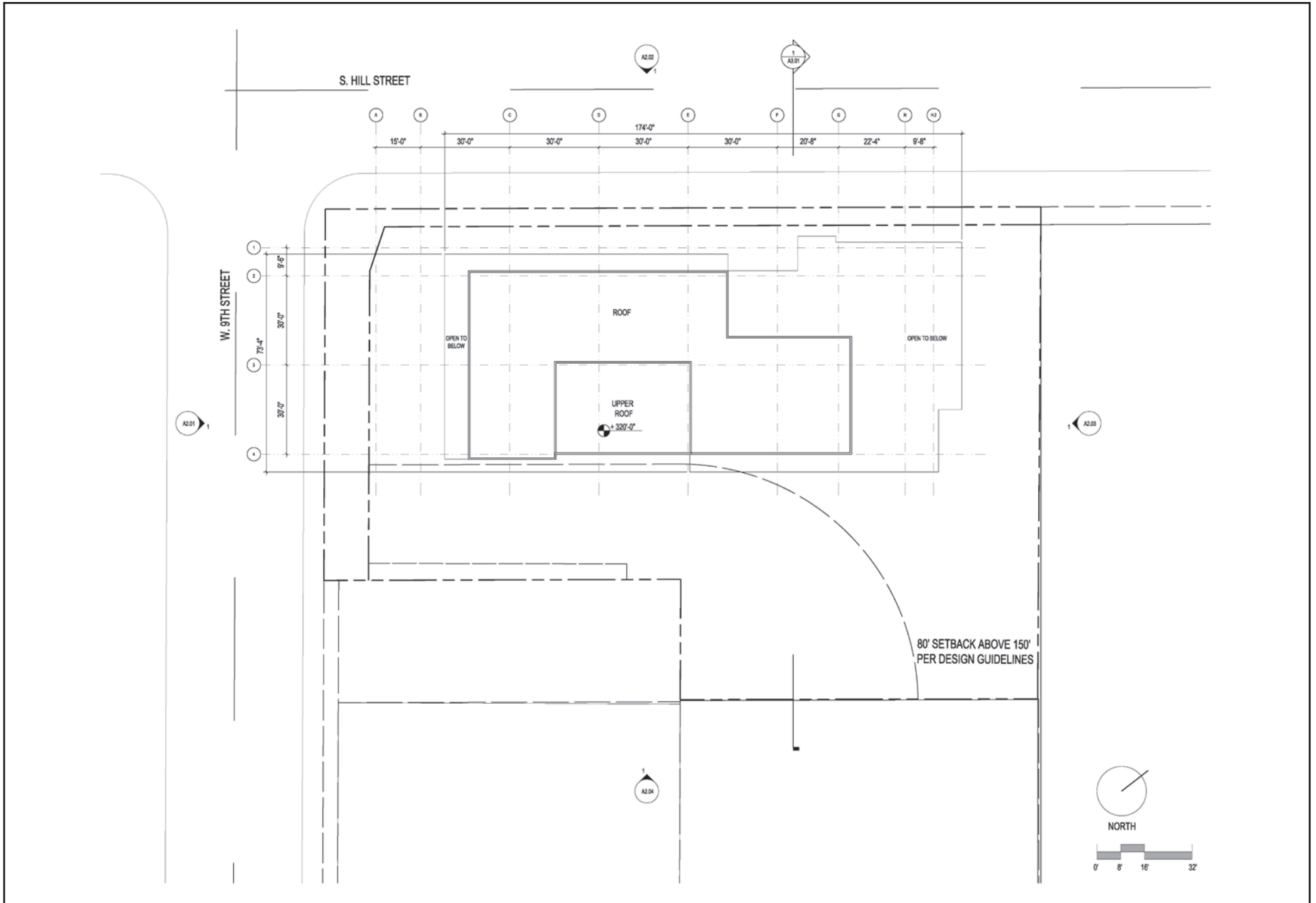
Figure II-12
Level 6 Plan



Source: RTKL, February 18, 2016



Source: RTKL, February 18, 2016



Source: RTKL, February 18, 2016

space fronting Hill Street and 9th Street. The Modified Project would include a comprehensive podium screening program that would incorporate precast concrete framing metal panels and vertical louvers along 9th Street and Hill Street to integrate the parking levels with the habitable space above. The design of these levels would also carry the scale and rhythm of the adjacent Broadway Trade Center building through the block. As shown in Figure II-23, Enlarged Podium and Screening Diagram and Wall Sections, the Modified Project would enclose the eastern portion of the podium directly facing the adjacent Eastern Columbia building and approximately 63.5 feet of the portion of the podium facing the adjacent parking garage. Design features of the Modified Project are further illustrated in Figure II-24, Basis of Design, and in Figure II-25, Design Guidelines Diagram.

OPEN SPACE AND LANDSCAPING

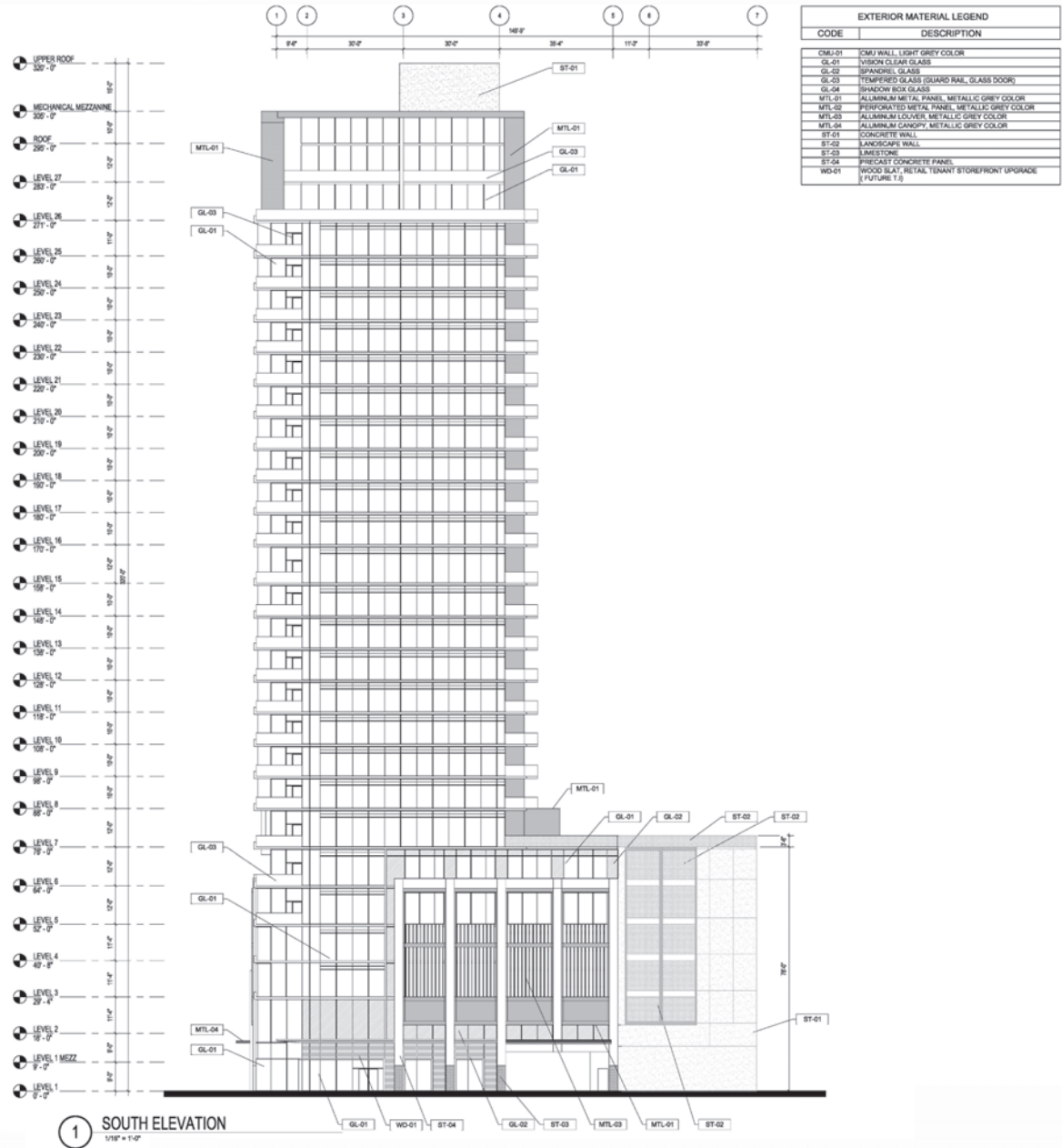
Amenities proposed within the residential common open space areas include an amenity lounge and fitness room on the 7th level and a sky lounge and deck on the 27th level. The open space requirements and amount of open space proposed for the Modified Project are summarized in Table II-2, Summary of Required and Proposed Open Space Areas. The Modified Project would include a total of approximately 32,225 square feet of common and private open space areas incorporated throughout the Project Site.

The 7th floor would include approximately 12,437 square feet of common open space with a 9,217 square foot landscaped roof deck, including a swimming pool, and 3,220 square feet of indoor amenities. Indoor amenities on the 7th floor are proposed to include a lounge and a fitness center. The 27th level would feature a sky deck and an indoor sky lounge. The Modified Project also includes approximately 15,150 square feet of private open space within balconies and terraces.

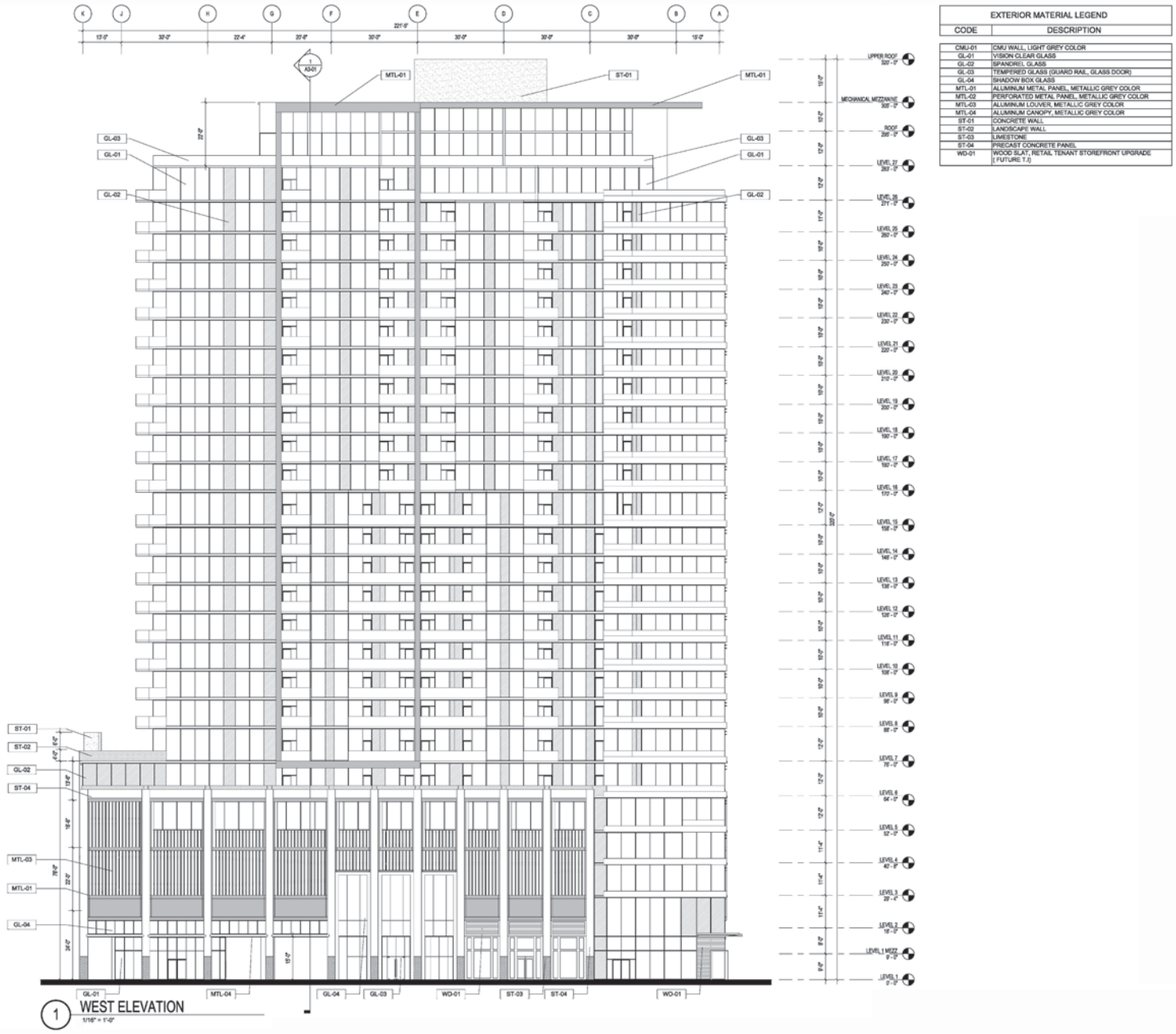
Existing street trees adjacent to the property along S. Hill Street and 9th Street would remain in place, with the exception of one street tree (*jacaranda sp.*) along Hill Street. This street tree would be replaced in consultation with the City of Los Angeles Division of Urban Forestry and approved by the Board of Public Works. Pursuant to the LAMC Sec. 12.21.G. 2(a)(3), and consistent with the Downtown Design Guide, the Project would also provide one tree per four units for a total of 76 trees on-site. Figure II-26 through Figure II-28 depicts the street level, 7th level and 27th level landscape plans, respectively.

Table II-2
Summary of Required and Proposed Open Space Areas

LAMC Open Space Requirements	Dwelling Units	Open Space (square feet)
Less than 3 Habitable Rooms (100 sf/du)	242	24,200
3 Habitable Rooms (125 sf/du)	60	7,500
More than 3 Habitable Rooms (175 sf/du)	3	525
Total	305	32,225
<i>Source: Los Angeles Municipal Code, Section 12.21.G.2.</i>		
Proposed Open Space	Open Space (square feet)	
Private Balconies	15,150	
Amenity Deck (Level 7)	12,437	
Amenity Deck (Level 27)	4,638	
Total	32,225	
<i>Notes: du = dwelling unit; sq = square feet</i>		
<i>Source: RTKL, February 18, 2016.</i>		

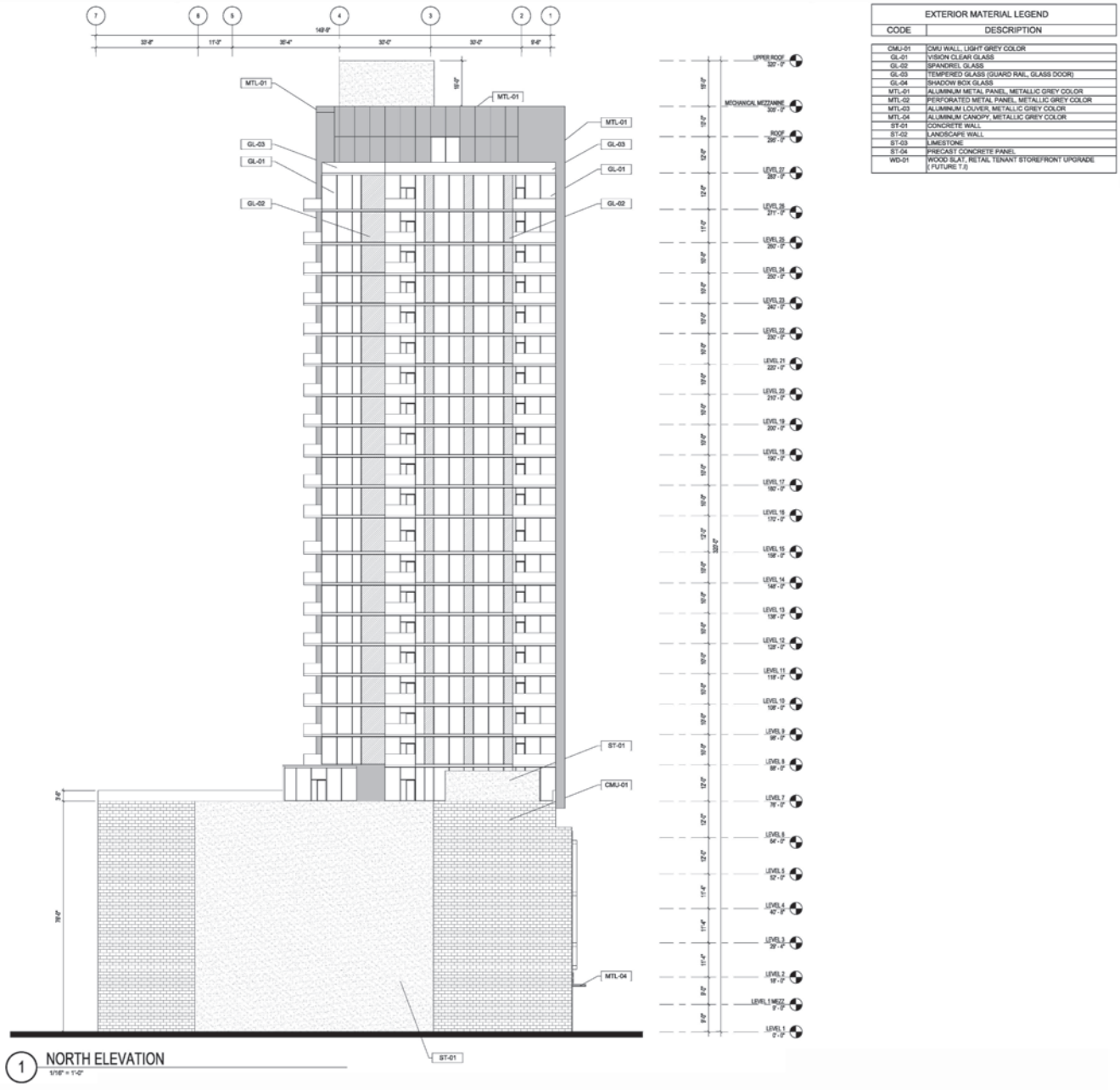


Source: RTKL, February 18, 2016

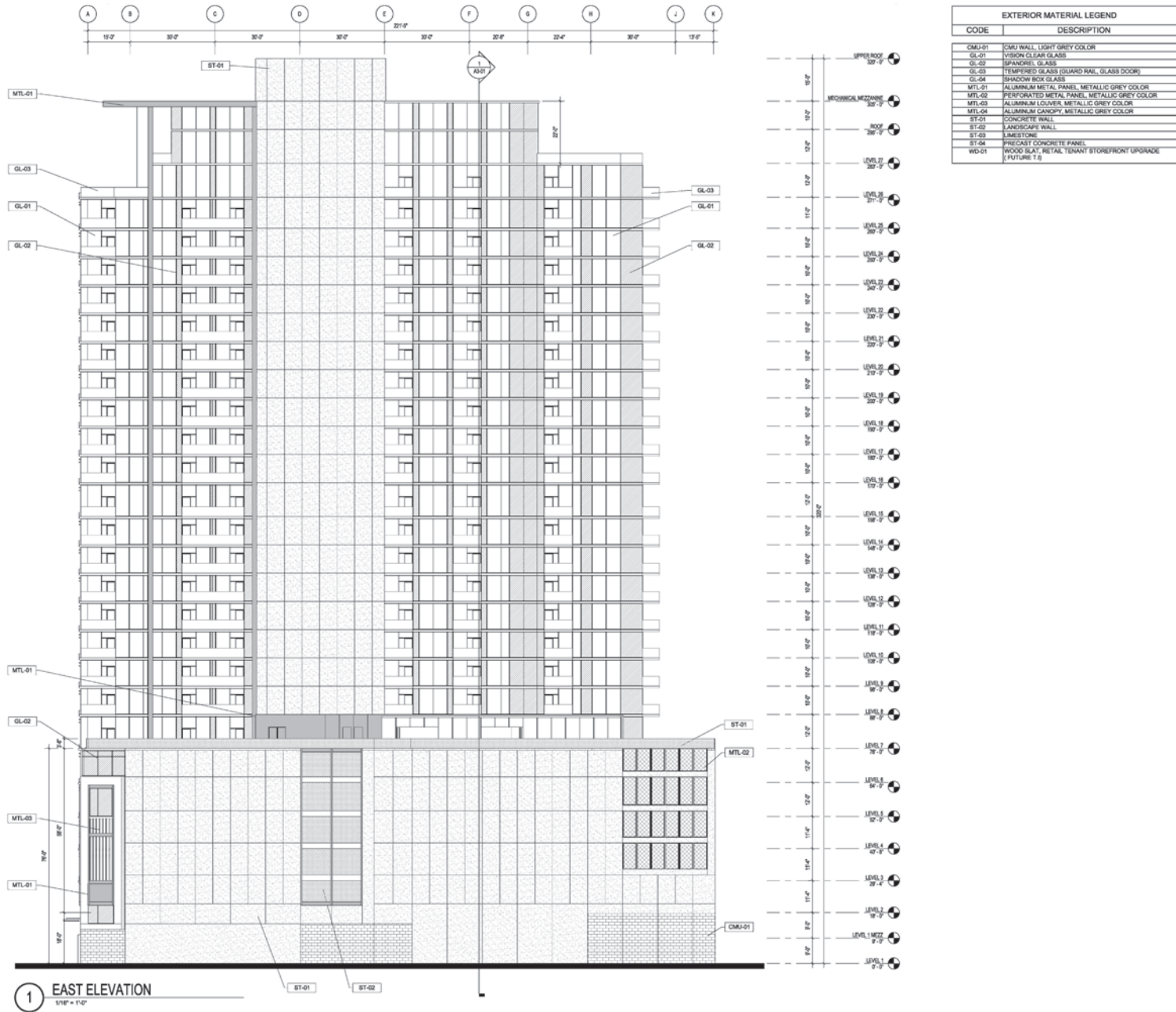


Source: RTKL, February 18, 2016

Figure II-17
West Elevation



Source: RTKL, February 18, 2016



Source: RTKL, February 18, 2016



1 SOUTH ELEVATION - 9TH ST ELEVATION
1" = 30'-0"

NOT FOR CONSTRUCTION

Source: RTKL, February 18, 2016

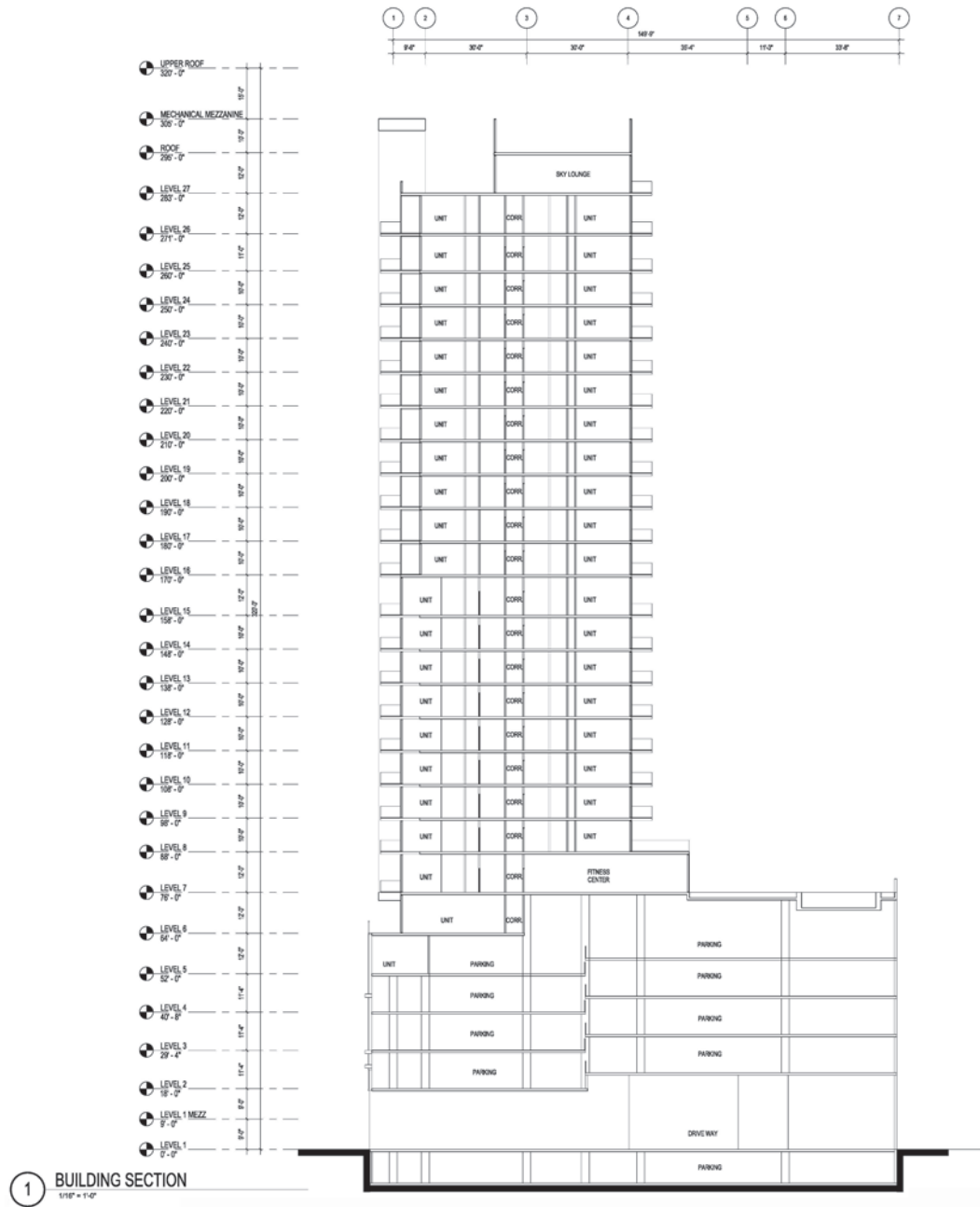


Figure II-20
9th Street Contextual Elevation

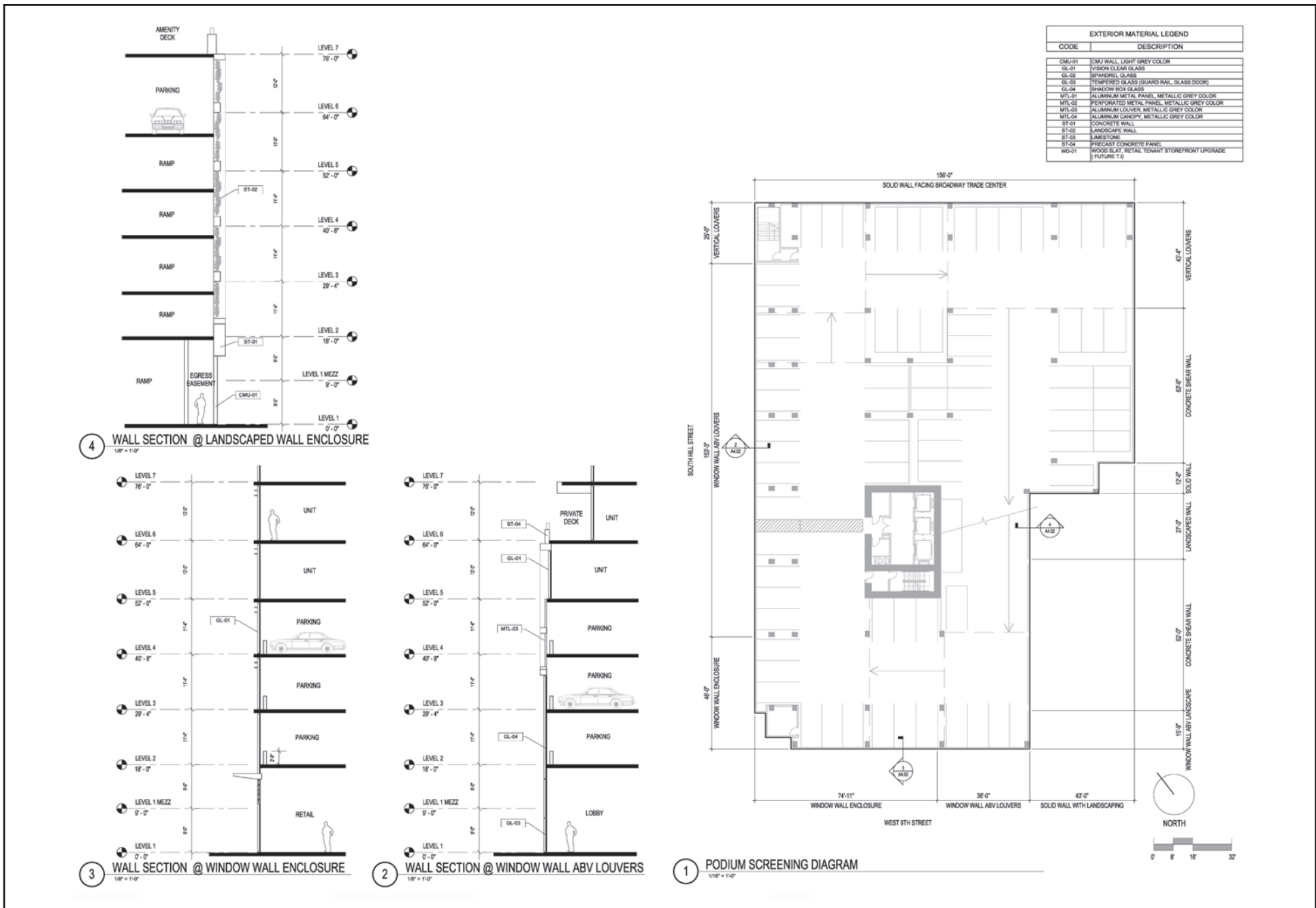


1 WEST ELEVATION - HILL ST ELEVATION
1" = 30'-0"

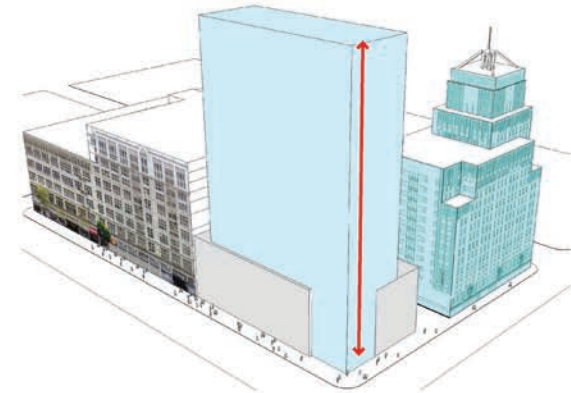
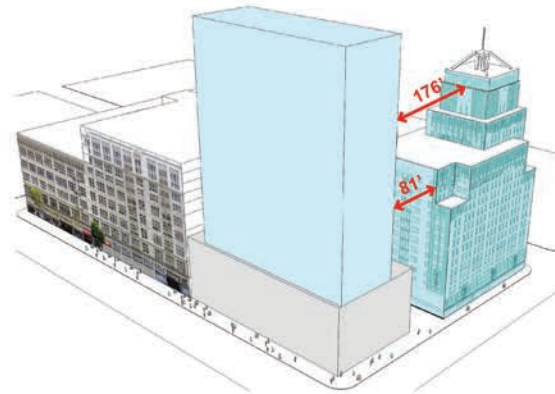
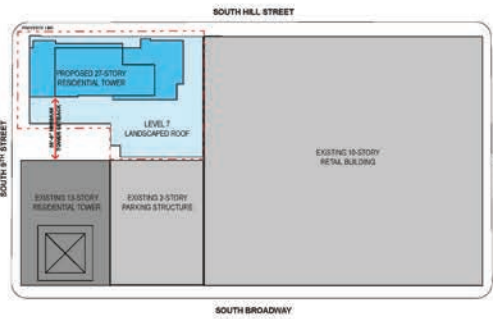
Source: RTKL, February 18, 2016



Source: RTKL, February 18, 2016



Source: RTKL, February 18, 2016

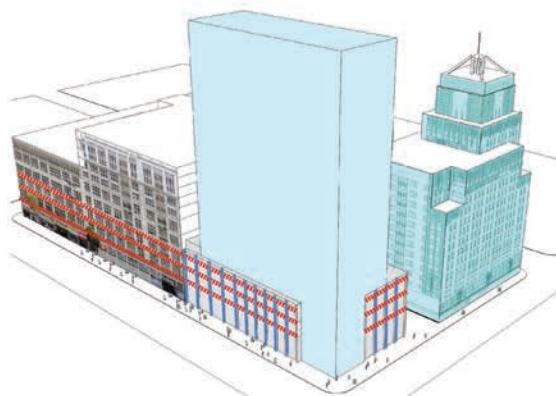


1 SITE - TOWER SPACING & LOCATION

PROJECT IS LOCATED AT 850 SOUTH HILL STREET, AND IS ADJACENT TWO HISTORICAL BUILDINGS: THE BROADWAY TRADE CENTER & THE EASTERN COLUMBIA BUILDING. PROPOSED TOWER IS POSITIONED TO PROVIDE A MINIMUM 80'-0" SEPARATION FROM THE EASTERN COLUMBIA BUILDING AND MORE THAN 175'-0" FROM ITS CLOCK TOWER.

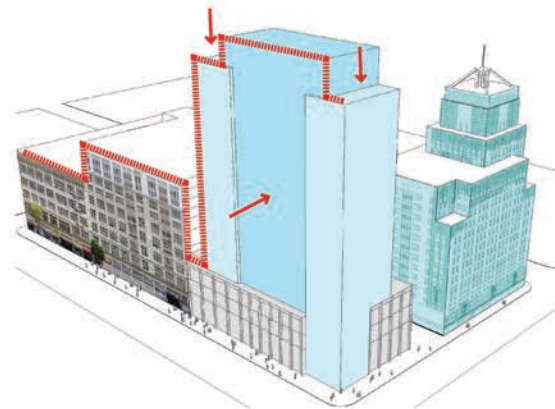
2 GROUND THE TOWER

TOWER MASSING EXTENDS TO THE GROUND AT THE CORNER TO ANCHOR THE STREET INTERSECTION.



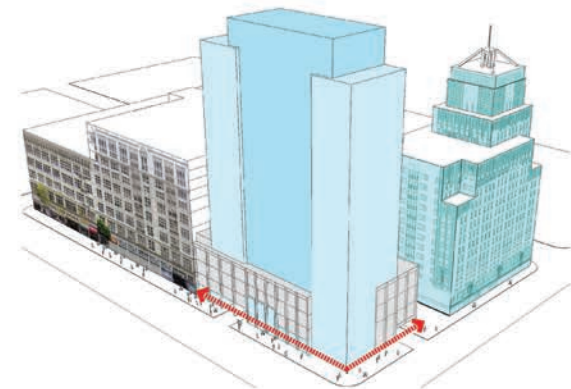
3 HISTORIC CONTEXT

PROPOSED PODIUM IS BROKEN DOWN VERTICALLY TO MAINTAIN A STEADY RHYTHM WITH THE ADJACENT EXISTING HISTORIC BUILDINGS ALONG THE STREET EDGES. PROPOSED PODIUM'S HORIZONTAL PROPORTIONS ALSO ALIGN WITH THE BROADWAY TRADE CENTER'S BASE PROPORTIONS AND CORNICE LINES.



4 STREETScape RHYTHM

PROPOSED MASSING IS BROKEN DOWN TO VISUALLY SLENDERIZE THE TOWER AND CONNECT WITH THE EXISTING CONTEXT AND STREETScape RHYTHM.

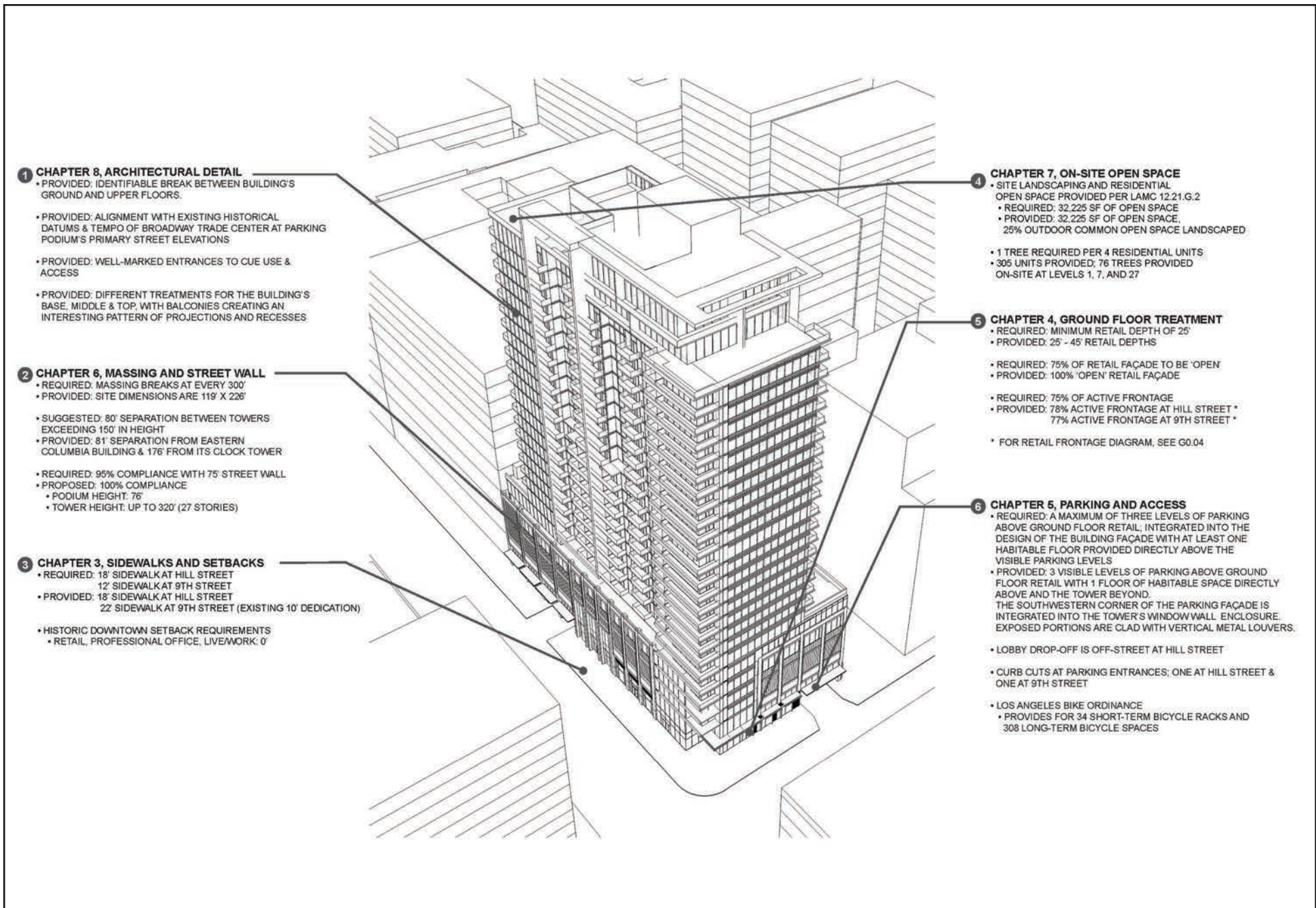


5 ACTIVATE THE STREETScape

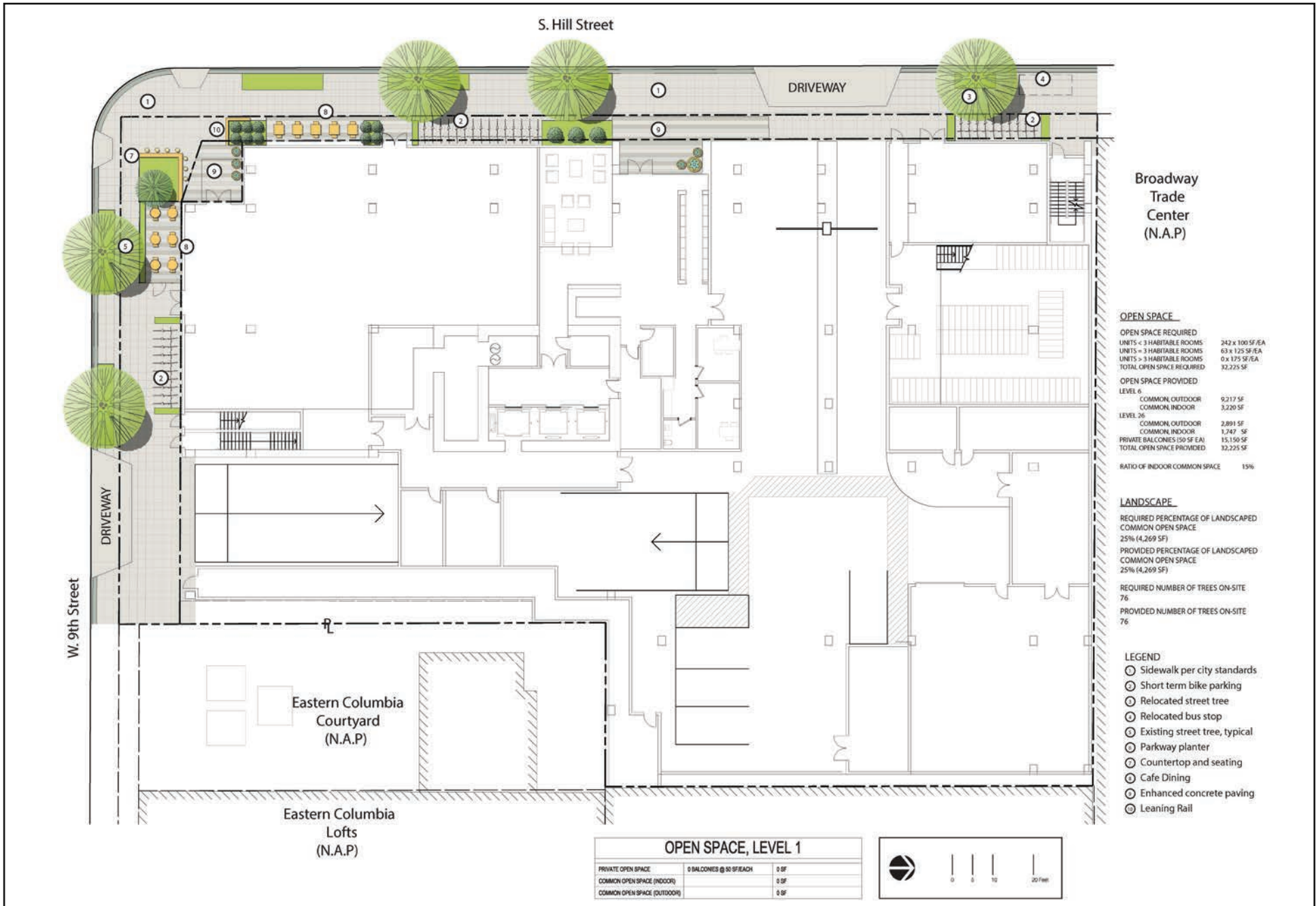
RETAIL AND THE MAIN RESIDENTIAL ENTRY PROVIDE ACTIVE GROUND FLOOR USES ALONG THE STREET FRONTAGE, CONNECTING THE RETAIL ALONG BOTH 9TH AND HILL STREETS.

NOT FOR CONSTRUCTION

Source: RTKL, February 18, 2016



Source: RTKL, February 18, 2016



Broadway Trade Center (N.A.P.)

OPEN SPACE

OPEN SPACE REQUIRED

UNITS < 3 HABITABLE ROOMS	242 x 100 SF/EA
UNITS = 3 HABITABLE ROOMS	63 x 125 SF/EA
UNITS > 3 HABITABLE ROOMS	0 x 175 SF/EA
TOTAL OPEN SPACE REQUIRED	32,225 SF

OPEN SPACE PROVIDED

LEVEL 6	
COMMON, OUTDOOR	9,217 SF
COMMON, INDOOR	3,220 SF
LEVEL 26	
COMMON, OUTDOOR	2,891 SF
COMMON, INDOOR	1,247 SF
PRIVATE BALCONIES (50 SF EA)	15,150 SF
TOTAL OPEN SPACE PROVIDED	32,225 SF

RATIO OF INDOOR COMMON SPACE 15%

LANDSCAPE

REQUIRED PERCENTAGE OF LANDSCAPED COMMON OPEN SPACE
25% (4,269 SF)

PROVIDED PERCENTAGE OF LANDSCAPED COMMON OPEN SPACE
25% (4,269 SF)

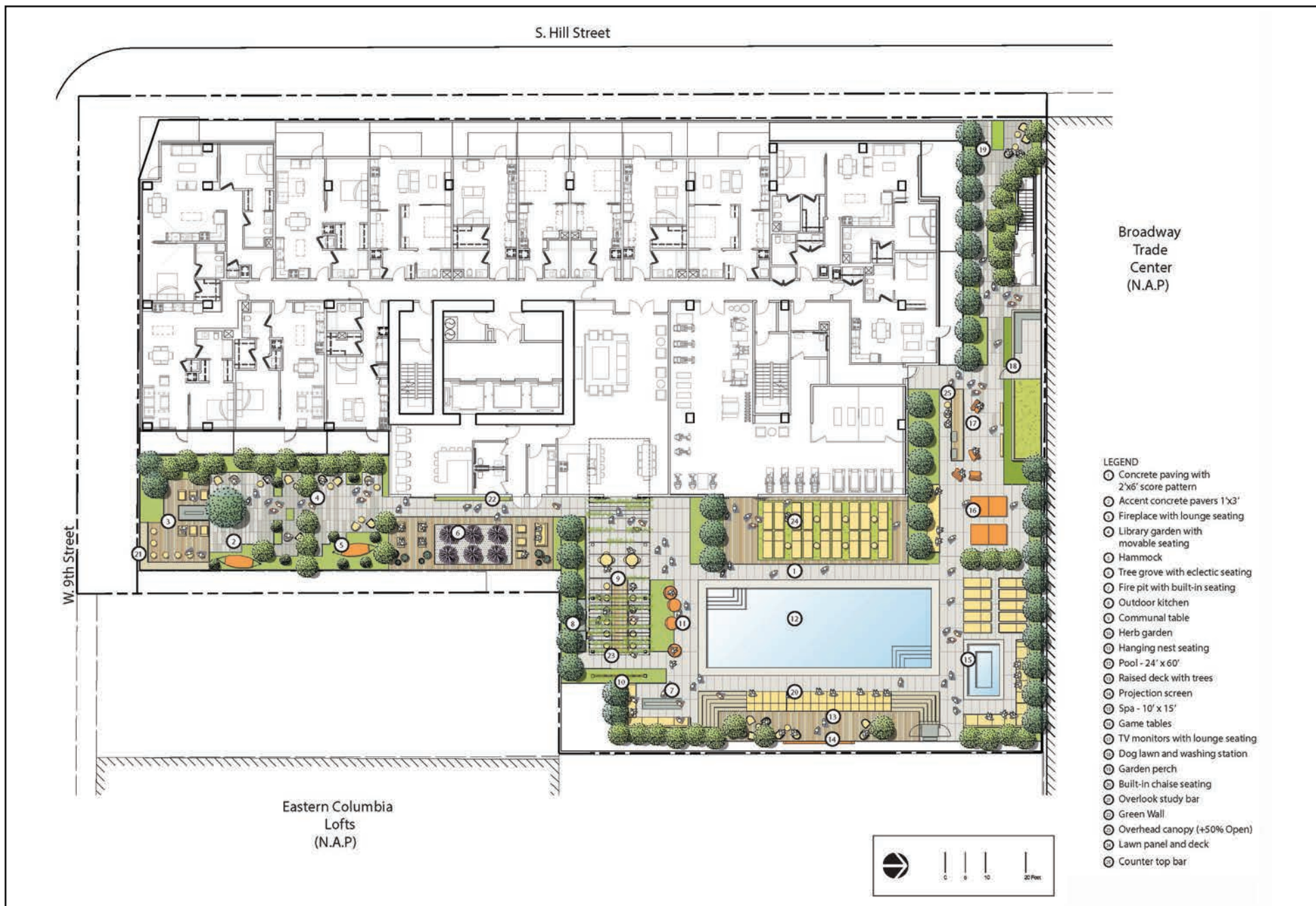
REQUIRED NUMBER OF TREES ON-SITE
76

PROVIDED NUMBER OF TREES ON-SITE
76

Source: RTKL, February 18, 2016



Figure II-26
Ground Level Landscape Plan



S. Hill Street

W. 9th Street

Eastern Columbia
Lofts
(N.A.P)

Broadway
Trade
Center
(N.A.P)

LEGEND

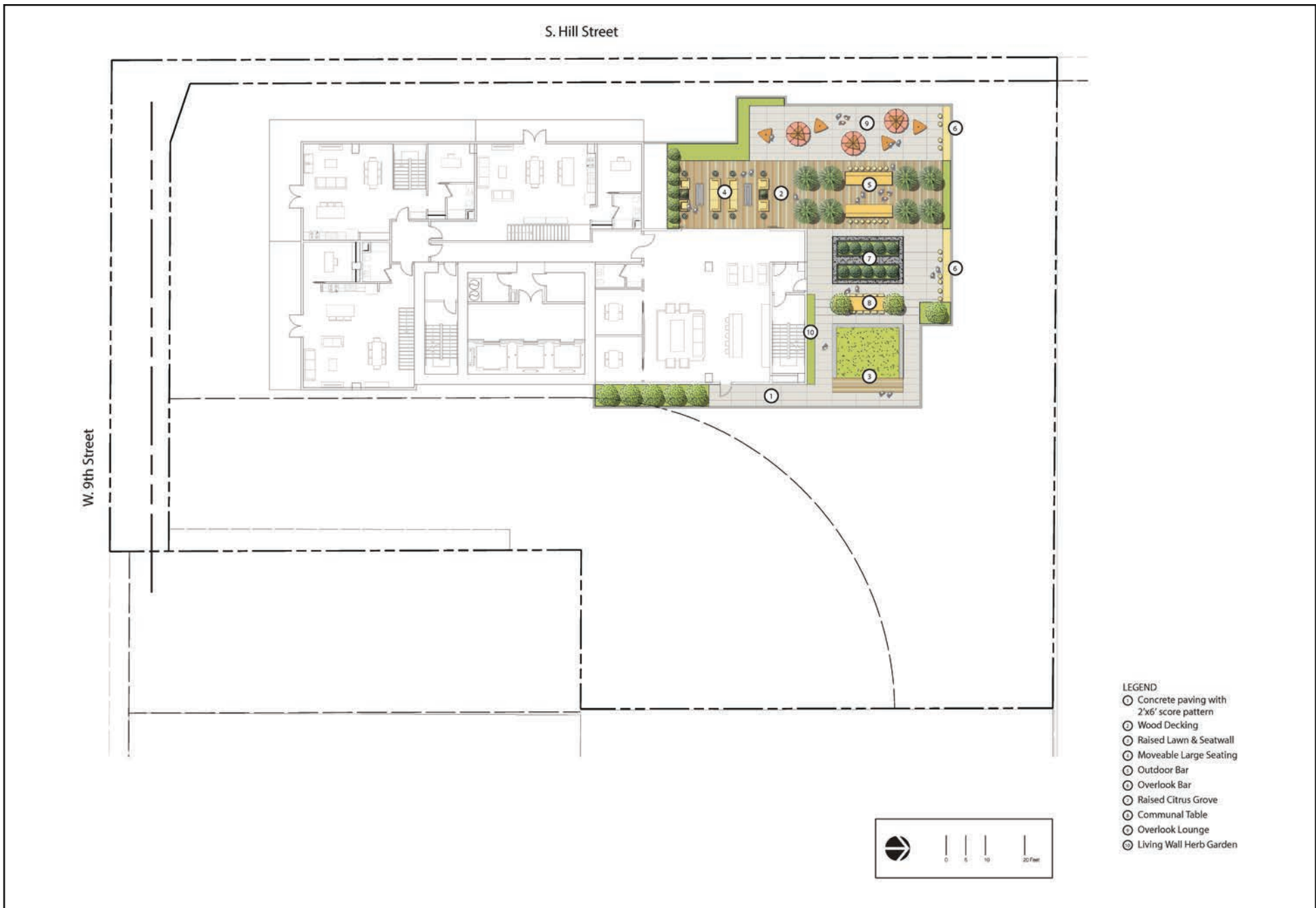
- ① Concrete paving with 2'x6' score pattern
- ② Accent concrete pavers 1'x3'
- ③ Fireplace with lounge seating
- ④ Library garden with movable seating
- ⑤ Hammock
- ⑥ Tree grove with eclectic seating
- ⑦ Fire pit with built-in seating
- ⑧ Outdoor kitchen
- ⑨ Communal table
- ⑩ Herb garden
- ⑪ Hanging nest seating
- ⑫ Pool - 24' x 60'
- ⑬ Raised deck with trees
- ⑭ Projection screen
- ⑮ Spa - 10' x 15'
- ⑯ Game tables
- ⑰ TV monitors with lounge seating
- ⑱ Dog lawn and washing station
- ⑲ Garden perch
- ⑳ Built-in chaise seating
- ㉑ Overlook study bar
- ㉒ Green Wall
- ㉓ Overhead canopy (+50% Open)
- ㉔ Lawn panel and deck
- ㉕ Counter top bar



Source: RTKL, February 18, 2016



Figure II-27
7th Level Landscape Plan



Source: RTKL, February 18, 2016

SETBACKS

The Approved Project received a Zoning Administrator's Adjustment from the side yard requirements of LAMC 12.17.C.1 and 2, which required a 20-foot rear yard and side yards of 16 feet. However, per the Greater Downtown Housing Incentive Area, LAMC Section 12.22 C.3(a), no yard requirements apply for lots in the C5 Zone in the Greater Downtown Housing Incentive Area. The Urban Design Standards for the Downtown area encourages variations in setbacks along street frontages. The Project Site is located on a "Retail Street," as defined in Figure 3-1 of the Downtown Design Guide. Project setbacks are required to match the prevailing setback of the area. As further described in the Historic Downtown Los Angeles Design Guidelines, much of Historic Downtown is characterized by no setbacks.

The Original Project proposed zero yards for levels one through three of the parking structure. The podium and tower of the Original Project would closely abut the full height of the south façade of the Broadway Trade Center building to the north. The podium of the Original Project would abut the two-story Eastern Columbia garage and the northwest corner of the Eastern Columbia building, located to the east. The podium and tower of the Original Project would be set back from the west façade of the Eastern Columbia building by approximately 45 feet. The tower of the Original Project would be set back approximately 90 feet from the south façade of the podium. The podium component of the Modified Project would be constructed abutting the Broadway Trade Center building to the north (18 inches from the property line) and set back from the Eastern Columbia building by approximately 46 feet to the east. The tower component of the Modified Project would be separated by a 25-foot six-inch setback from the Broadway Trade Center to the north⁶. As shown in Figure II-6, Plot Plan, the tower component of the Modified Project would be separated by an 81-foot setback from the Eastern-Columbia Building to the east and separated by a 176-foot setback from the Eastern-Columbia Building's clock tower. Additionally, the Modified Project would be set back three feet from the Eastern Columbia's two-story parking garage, located to the east. The corner of the proposed podium that is directly north of the Eastern Columbia building would be set back from the Eastern Columbia building by approximately 17-feet seven inches to the west and 12-feet six inches to the north. The Modified Project would not provide setbacks from the public right-of-ways along S. Hill Street and W. 9th Street.

PARKING AND ACCESS

Parking for the retail and residential uses on-site would be provided in one subterranean level, at grade and levels two through five. Level five would support additional parking behind habitable space fronting Hill Street and 9th Street. Vehicular access to the Project Site would be provided via two ingress/egress driveways with one located on S. Hill Street and one located on W. 9th Street. The Project Site is located within the Central City Parking Exception area (LAMC Section 12.21 A 4 (p)), which permits one (1) space for each dwelling unit, except where there are more than six (6) dwelling units of more than three (3) habitable rooms per unit on any lot, the ratio of parking spaces required for all of such units shall be at least one and one-quarter (1¼) parking spaces for each dwelling unit of more than three (3) habitable

⁶ *Distance from the Broadway Trade Center to the face of the proposed new building would be approximately 25 feet six inches. There would be an approximate 25-foot setback from the Broadway Trade Center to the face of the proposed building's northwest balcony and a 20 setback to the face of the northeast balcony.*

rooms. Additionally, no parking is required for retail spaces less than 7,500 square feet. As summarized in Table II-3, and discussed in further detail below, the Modified Project would be consistent with the applicable parking requirements of the LAMC. The Modified Project would require a total of 321 residential parking spaces. A total of 336 parking spaces would be provided. The Modified Project would additionally provide on-site bicycle parking in bicycle storage spaces located on the first level. As summarized in Table II-4, below, the Modified Project would be consistent with the applicable parking requirements of the LAMC for bicycle parking spaces.

**Table II-3
Summary of Required and Proposed Vehicle Parking Spaces**

Description	Quantity	Parking Required ^[a]		Parking Provided
		Rate	Spaces	
Residential				
Units with 3 or less Habitable Rooms	242	1.00/du	242	--
Units with more than 3 Habitable Rooms	63	1.25/du	79	--
<i>Subtotal Residential</i>	305 du		321	336
Commercial				
Retail	6,171 sf	1.00/1,000 sf > 7,500	0	0
<i>Subtotal Retail</i>	6,171 sf		0	0
TOTAL			321	336
<i>Notes:</i> du = dwelling unit, sf = square feet ^[a] LAMC 12.21 A.4.(p)(1). Exception for Central City Area. 1 space per du, except 1.25 spaces per du for du's of more than 3 habitable rooms where there are more than 6 units of more than 3 habitable rooms. Source: RTKL, February 18, 2016.				

**Table II-4
Summary of Required and Proposed Bicycle Parking Spaces**

Description	Quantity	Parking Required ^[a]		Total Spaces Required	Total Spaces Provided
		Short Term	Long Term		
Residential					
		(1 per 10 DUs)	(1 per DU)		
Dwelling Units	305 du	31	305	336	336
Commercial					
		(1 per 2,000 sf)	(1 per 2,000 sf)		
Retail	6,999 sf	3	3	6	6
TOTAL		34	308	342	343
<i>Notes:</i> du = dwelling unit, sf = square feet ^[a] LAMC 12.21 A.16. Bicycle Parking and Shower Facilities. Source: RTKL, February 18, 2016.					

CONSTRUCTION

Construction Schedule/Phasing

For purposes of analyzing impacts associated with air quality, this analysis assumes a Project construction schedule of approximately 24 months, with final buildout occurring in 2018. Construction activities associated with the Project would be undertaken in the following sequential stages: (1) site clearing, (2) excavation, grading and foundations, (3) building construction, (4) architectural finishing) and (5), paving. It is anticipated that the site clearing phase would necessitate the removal of approximately 500 cubic yards of asphalt and debris. Preparation of the proposed building footings and structural foundation would require the excavation and export of up to 500 cy of asphalt debris and approximately 30,752 cy of soil.

Construction activities would necessitate temporary lane closures on streets adjacent to the Project Site on an intermittent basis for utility relocations/hook-ups, delivery of materials, and other construction activities as may be required. However, site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on-site to mitigate any temporary impacts to the neighborhood and surrounding traffic. Construction equipment would be staged on-site for the duration of construction activities. Traffic lane and right-of-way closures, if required, would be properly permitted by the City agencies and would conform to City standards.

As discussed further in Section XVI. Transportation and Traffic (See Project Design Feature PDF-TRAFFIC-1) the Modified Project would require a Construction Management Plan, which shall be submitted to DOT for review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties, and if applicable, the location of off-site staging areas for haul trucks and construction vehicles. All construction related traffic shall be restricted to off-peak hours. With respect to pedestrian access in the project area during construction of the Modified Project, implementation of Project Design Feature PDF-TRAFFIC-2 would ensure adequate and safe pedestrian circulation during construction.

Unless stated otherwise, all construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 a.m. to 9:00 p.m. Monday through Friday, and between 8:00 a.m. and 6:00 p.m. on any Saturday or national holiday. The Department of City Planning further restricts the hours of construction in residential areas to 6:00 p.m. on weekdays. No construction activities are permitted on Sundays. The Modified Project would comply with these restrictions.

Haul Route

All construction and demolition debris would be recycled, but demolition debris and soil materials from the Project Site that cannot be recycled or diverted would be hauled to the Sunshine Canyon or Chiquita Canyon landfills, which accept construction and demolition debris and inert waste from areas within the

City of Los Angeles. The Sunshine Canyon Landfill is approximately 27 miles north of the Project Site (approx. 54 miles round trip). The Chiquita Canyon landfill is approximately 41 miles to the north of the Project Site (approx. 82 miles round trip). For recycling efforts, the Central L.A. Recycling Center and Transfer Station (Browning Ferris Industries) accepts construction waste for recycling and is located approximately 2.3 miles from the Project Site (approx. 4.6 miles round trip).

For purposes of analyzing the construction-related impacts, it is anticipated that the excavation and soil export would involve 18-wheel bottom-dump trucks with a 20 cubic yard hauling capacity (i.e., 30 tons maximum gross weight). All truck staging would either occur on-site or at designated off-site locations and radioed into the site to be filled. The local haul route from the 110 Freeway would utilize 9th Street and S. Hill Street. Both are designated as Modified Secondary Highways. Traveling from the Project Site to the 110 Freeway, the haul route would utilize 8th Street, a one-way westbound street, which is designated as a Secondary Highway. The haul route specified above may be modified in compliance with applicable City policies, provided DOT and/or Street Services approves any such modification.

RELATED PROJECTS

In accordance with CEQA Guidelines Section 15064(h), this IS/MND includes an evaluation of the Project's cumulative impacts. The guidance provided under CEQA Guidelines Section 15064 (h) is as follows:

“(1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. “Cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

(2) A lead agency may determine in an initial study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.

(3) A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction

over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.

(4) The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable."

In light of the guidance summarized above, an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B)). To present a more conservative analysis, the lead agency utilizes the "list" approach and supplements with the "plan" approach to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Project, were identified for evaluation.

The related projects identified are included in Table II-5, Related Projects List, below. A total of 83 related projects were identified within the affected Project area. An analysis of the cumulative impacts associated with these related projects and the Project are provided under each individual environmental impact category in Section III of this IS/MND. The locations of the related projects are shown in Figure II-29, Related Projects Location Map.

**Table II-5
Related Projects List**

Project Number	Project Name	Location/Address	Project Description	Number	Units
1	Mixed-Use Project	662 S. Lucas Avenue	Condominiums Retail	130 7,037	du sf
2	400 S. Broadway Mixed-Use Project	400-416 Broadway	Apartments Retail	450 7,500	du sf
3	1133 Hope Street Project	1133 Hope Street	Apartments Retail	208 5,029	du sf
4	Restaurant and Bar	220 W 9 th St	Restaurant/Bar	23,000	sf
5	8 th and Grand Mixed-Use Project	710 S. Grand	Condominiums Retail Restaurant	700 27,000 5,000	du sf sf
6	L.A. Trade Tech College – 5-Year Master Plan	400 Washington Boulevard	5-Year Master Plan Project	6,300	student
7	Mixed-Use	1148 S. Broadway	Apartments Retail	94 2,500	du sf
8	Mixed-Use (Herald Examiner)	146 W. 11 th Street	Apartments Office Retail	391 39,720 40,000	du sf sf
9	SOLA	Block bounded by Washington Blvd, Main Street, 23 rd St, Hill St.	Condominiums Apartments Hotel Retail/Commercial Office Gallery/Museum Gym	900 550 210 143,100 180,000 17,600 8,000	du du room sf sf sf sf
10	Hotel	633 S. Spring	Hotel Amphitheater Bar/Lounge Restaurant	160 101 3,132 4,096	room seat sf sf
11	LASED Entertainment District	Figueroa Street / 11 th Street	Residential Educational Retail Restaurants Health Club Sport Bar Hotel Office Production Studio Convention Center Expansion	1,620 95,706 174,769 70,052 15,670 1,980 222 367,300 298,500 250,000	du sf sf sf sf sf room sf sf sf
12	Metropolis Mixed-Use	851 S. Francisco Street	Hotel Condominiums Office Retail	480 836 988,225 46,000	room du sf sf
13	Mixed-Use Development	745 S. Spring	Condominiums	247	du

Project Number	Project Name	Location/Address	Project Description	Number	Units
			Retail	10,675	sf
14	Little Tokyo Block 8 Project	200 S. Los Angeles Street	Condominiums Apartments Retail	510 280 50,000	du du sf
15	Mixed-Use Residential, Retail, and Restaurant	1150 S. Grand Avenue	Condominiums Retail Restaurant	374 9,844 7,600	du sf sf
16	Mixed-Use	1050 S. Grand Avenue	Condominiums Retail Restaurant	128 3,472 2,200	du sf sf
17	Mixed-Use Residential, Retail, and Restaurant	609 W. 8th	Condominiums Hotel Retail Restaurant	225 200 30,000 32,000	du room sf sf
18	Mixed-Use Residential and Retail	1115 S. Hill Street	Condominiums Retail	172 6,850	du sf
19	Mixed-Use Development	610 S. Main Street	Restaurant Retail Pool / Event	13,921 726 726	sf sf sf
20	Mixed-Use	1329 W. 7 th Street	Apartments Retail	94 2,000	du sf
21	1212 Flower	1212 Flower	Apartments Retail/Restaurant Office	730 10,500 70,465	du sf sf
22	Park/Fifth Project	427 W. 5 th Street	Apartments Restaurant	615 16,310	du sf
23	Kawada Tower	240 S. Hill Street	Condominiums Retail	330 12,000	du sf
24	Bunker Hill Design and Development	Block bounded by 3 rd Street, Olive Street, Hill Street, and 4 th Street	Office Retail	960,000 100,000	sf sf
25	Grand Avenue Project	Parcel Q and Parcel W – bounded b 1 st Street, Grand Avenue, Hill Street, and Upper 2 nd Street. Parcel L/M-2 – Bounded by GTK Way, Hope Street, and Upper 2 nd Street.	Condominiums Apartments County Office Building Super Market Restaurant Retail Event Faculty Health Club Hotel	1,648 412 681,000 53,000 67,000 225,250 250 50,000 275	du du sf sf sf sf seat sf room
26	Mixed Use	820 S. Olive Street	Apartments Retail	589 4,500	du sf
27	City Corp Plaza Phase III	755 S. Figueroa Street	Office	792,000	sf
28	Mixed-Use Development	1027 W. Wilshire Project	Condominiums Retail	407 7,472	du sf
29	Mixed-Use	1135 W. 7 th Street	Condominiums Retail	130 7,000	du sf
30	Restaurant Project	1036 S. Grand Avenue	Restaurant	7,149	sf
31	1001 S. Olive	1001 S. Olive Street	Apartments Restaurant	225 5,000	du sf
32	Apartments	1247 S. Grand Avenue	Apartments	118	du

Project Number	Project Name	Location/Address	Project Description	Number	Units
			Retail	5,125	sf
33	Residential Project	1500 S. Figueroa Street	Apartments Retail	190 10,922	du sf
34	Witmer Project	1247 W. 7 th Street	Condominiums Retail	186 6,200	du sf
35	1400 S. Figueroa Residential Project	1400 S. Figueroa Street	Apartments Retail / Restaurant	106 4,834	du sf
36	Olive / Olympic Project	NE corner of Olive and Olympic	Apartments Restaurant	263 14,500	du sf
37	Condominiums	221 S. Los Angeles Street	Condominiums Retail	300 3,400	du sf
38	801 S. Olive Street Project	801 S. Olive Street	Apartments Retail Restaurant	363 2,500 7,500	du sf sf
39	Retail Project	810 E. Pico Boulevard	Retail	181,620	sf
40	Variety Arts Project	940 S. Figueroa Street	Office Bar / Lounge Entertainment / Performing Arts Event During Daytime	3,295 2,080 30 15	sf sf employee employee
41	Hellman / Banco Building	354 S. Spring Street	Apartments	212	du
42	Mixed-Use Building	233 W. Washington Boulevard	Apartments Retail	160 24,000	du sf
43	Good Samaritan Mixed-Use Project	1136 W. 6 th Street	Apartments Retail	725 39,999	du sf
44	Residential Project	534 S. Main Street	Apartments Retail Restaurant	160 180,000 3,500	du sf sf
45	Condominiums	1340 S. Olive Street	Condominiums	150	du
46	Hill Mixed	920 S. Hill	Apartments Retail	216 3,900	du sf
47	Broadway Mixed	955 S. Broadway	Apartments Retail	201 6,000	du sf
48	Office	1130 W. Wilshire Boulevard	Office Day Care High Turnover Restaurant Quality Restaurant	88,224 20 248 5,375	sf student sf sf
49	Embassy Tower	848 S. Grand Avenue	Hi-rise Condominiums Market	420 38,500	du sf
50	Mixed-Use	1234 W. 3 rd Street	Apartments Retail	363 7,740	du sf
51	ISAF	201 S. Broadway	Restaurant, Retail, Office, and Bar	27,675	sf
52	Wilshire Grand Redevelopment Project	900 W. Wilshire Boulevard	Hotel Residential Unites Office Fitness Facility Retail / Restaurant	560 100 1,500,000 20,000 50,000	room du sf sf sf

Project Number	Project Name	Location/Address	Project Description	Number	Units
53	Washington Bl Opportunity MU	220 E. Washington Boulevard	Residential Units	230	du
			Renovate Residential Units	32	du
			Specialty Retail / Restaurant	19,000	sf
54	Mixed-Use	2100 S. Figueroa	Condominiums	291	du
			Retail	7,134	sf
55	DTLA South Park – Site 1	1120 S. Grand Avenue	High-rise Apartment	461	du
			Hotel	300	room
			Retail	8,700	sf
56	DTLA South Park – Site 4	1230 S. Olive Street	Apartments	362	du
			Retail	4,000	sf
57	Sports Museum	1900 S. Main Street	Museum	32,000	sf
58	New Medical Office Building	Wilshire Boulevard / Witmer Street	Imaging Center, Pharmacy, Surgical Suites, and Physician Offices	150,000	sf
59	Federal Courthouse	Southwest corner of 1 st Street and Broadway	Courthouse	600,000	sf
60	Los Angeles Street Civic Center Project	150 N. Los Angeles Street	Government Office	712,500	sf
			Retail	35,000	sf
			Child Care Facility	2,500	sf
61	Mixed-Use	1111 W. Wilshire Boulevard	Condominiums	420	du
			Hotel	140	room
62	Mixed-Use	340 S. Hill Street	Apartments	428	du
			Retail	6,700	sf
63	Mixed-Use	732 S. Spring Street	Apartments	400	du
			Pharmacy / Drug Store	1,500	sf
64	Case Hotel	1106 S. Broadway	Hotel	151	room
65	Apartment	2455 Figueroa Street	Apartments	145	du
66	Sparkle Factory	908 S. Broadway	Office	11,900	sf
			Retail	11,900	sf
67	1000 Grand Project	1000 Grand Avenue	Apartments	274	du
			Restaurant	12,000	sf
68	Olympic / Hill Project	Northwest corner of Olympic / Hill	Apartments	300	du
			Retail	14,500	sf
			Restaurant	8,500	sf
69	Residential Project	1360 S. Figueroa Street	Apartments	443	du
			Retail	11,000	sf
70	Sprint Street Garage and Apartments	Spring Street south of 5 th Street	Apartment	120	du
71	Mixed-Use	737 S. Spring	Apartments	320	du
			Pharmacy	25,000	sf
72	SB OMEGA	601 S. Main Street	High-rise Condo	350	du
			Retail	32,000	sf
73	9 th / Olive Project	840/888 S. Olive Street	Apartments	303	du
			Retail	9,680	sf
			Restaurant	1,500	sf
74	Residential Project	1340 S. Figueroa	Apartments	252	du
			Restaurant	11,000	sf
75	Clark Hotel	426 S. Hill Street	Hotel	347	room
76	Flower/23 rd Mixed-Use	2300 S. Flower Street	Apartments	1,500	du

Project Number	Project Name	Location/Address	Project Description	Number	Units
			Retail	40,000	sf
77	Onyx Apartment	Pico Boulevard between Flower and Grand	Apartments Retail Quality Restaurant Fast-Food Restaurant	419 29,200 6,400 6,400	du sf sf sf
78	Valencia Project	Northwest corner of Wilshire and Valencia	Apartments Retail Restaurant	218 6,000 1,500	du sf sf
79	City Market Project	San Pedro Street between 9 th Street and 12 th Street	University Shopping Center Cinema Apartments Hotel Office	1,400 176,733 744 945 210 294,641	student sf seat du room gsf
80	G12 Project	North of Pico between Grand and Olive	Apartments Retail Restaurant	640 30,000 10,000	du sf sf
81	Residential Project	1027 S. Olive Street	Apartments	100	du
82	Mixed-Use	928 S. Broadway	Apartments Retail Live/Work Office	662 47,000 11,000 34,824	du sf sf sf
83	Condominiums	456 S. Witmer	Condominiums	39	du
84	Broadway Trade Center	830 S Hill Street	Office Restaurant	122,050 25,217	sf sf
--	Restoration of Historic Streetcar Service ^[a]	--	--	--	--

Notes:

du = dwelling unit, sf = square feet; gsf = gross square feet

** Related project #5, #68 and #73 have recently been completed and are now operational. At the time the Traffic Study was completed for the Modified Project these project were in various phases and were considered in the base line data. As such, these projects are also reflected in the cumulative analyses in Section III of this Addendum to provide a more conservative analysis.*

^[a] Alternative routes for The Restoration of Historic Streetcar Service in Downtown Los Angeles have yet to be established and will be analyzed in the Draft Environmental Impact Report (Los Angeles County Metropolitan Transportation Authority, City of Los Angeles Downtown LA Streetcar, Fact Sheet, website: http://media.metro.net/projects_studies/historic-streetcar/images/streetcar_factsheet_2013_1101.pdf, accessed October 2015.)

Sources: The Mobility Group, Alexan South Broadway Project Traffic Study, August 3, 2015, and Supplemental Traffic Review Memorandum for 850. S. Hill Street Project, January 22, 2016.



Source: The Mobility Group, August 2015 and January 2016



Figure II-29
Related Project Location Map

II. PROJECT DESCRIPTION

C. ENTITLEMENT REQUESTS

The Applicant is requesting the approval of the following discretionary actions from the Los Angeles Department of City Planning:

1. A Transfer of Floor Area Rights of less than 50,000 square feet; and
2. Site Plan Review.

The Applicant is also requesting the CRA/LA, a designated local authority, successor agency to the Community Redevelopment Agency of the City of Los Angeles:

1. Approve the TFAR of less than 50,000 square feet, pursuant to the City Center Redevelopment Plan; and
2. Make findings pursuant to the City Center Redevelopment Plan.

The Applicant would also request approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities including, but not limited to, the following: excavation, shoring, grading, foundation, haul route (for the export of approximately 500 cy of asphalt debris and approximately 30,752 cy of soil), and building and tenant improvements for the Project Site, and the Board of Public Works, Urban Forestry Division, for removal and replacement of street trees.

III. ENVIRONMENTAL IMPACT ANALYSIS

INTRODUCTION

This section of the Initial Study contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines, C.C.R. Title 14, Chapter 3, 15000-15387). The analytical methodology and thresholds of significance are based on the *L.A. CEQA Thresholds Guide (2006)*, unless otherwise noted. As an Addendum to the previously adopted 2007 IS/MND, this analysis incorporates the findings and analysis of the prior IS/MND and the mitigation measures adopted in conjunction with the Project's prior approvals, as applicable. In addition, this Addendum addresses any changes that may have occurred with respect to the surrounding environmental conditions and identifies whether the Modified Project's environmental impacts would be the same, reduced or more severe than the impacts disclosed in the 2007 IS/MND for the Original Project. For purposes of the analysis below, the Project that was analyzed in the 2007 IS/MND is referred to herein as the "Original Project." For comparative purposes, all references to impact conclusions are based on the Original Project (i.e., what was previously analyzed in the 2007 IS/MND, which was adopted in conjunction with the prior Approvals). The differences, if any, between the prior environmental impacts identified for the Original Project and the change in impacts generated by the Modified Project are the focus of this Addendum.

ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

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

The City's CEQA thresholds provides that a significant impact may occur if the project includes a proposal to develop or allow development in an existing natural open space area, or has the potential to introduce features that would block or detract from the existing valued aesthetic quality of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest).

Original Project

Less Than Significant. The 2007 IS/MND concluded that views in the project vicinity are constrained by the existing mid- to high-rise buildings around the Project Site and the project area's relatively flat topography. Therefore no unique scenic vistas or focal point views are available surrounding the Project Site. The proposed 21-story tower (approximately 246 feet in height) would not be substantially taller than the existing buildings in the immediate vicinity of the Project Site, and, as such, the Original Project would not dramatically change the southern edge of the City skyline when viewed from a distance. Therefore, impacts of the Original Project on scenic vistas would be less than significant.

Modified Project

Less Than Significant. The 2007 IS/MND concluded that there are no unique scenic vistas or focal point views available to the north, south, east or west of the Project Site. There are no changed circumstances, project changes or new information that would change this conclusion. Regarding scenic vistas, a substantial number of high-rise buildings in the South Park area, in which the Project Site is located, have been constructed since the adoption of the 2007 IS/MND, such that the southern edge of the City skyline has shifted farther south. Similar to the conditions described in the 2007 IS/MND, the Project Site is currently developed with a surface parking lot. One notable change, however, that has occurred with respect to how aesthetic impacts are addressed under CEQA is the passage of Senate Bill 743 - Environmental Quality: Transit Oriented Infill Projects. In 2013, the State of California enacted Senate Bill 743 (SB 743),¹ which provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Public Resources Code Section 21099 defines a “transit priority area” as an area within one-half mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” Public Resources Code Section 21064.3 defines “Major Transit Stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” Public Resources Code Section 21061.3 defines an “Infill Site” as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

The Project Site is an infill site within a Transit Priority Area as defined by CEQA. It is located within ½ mile of two existing rail transit stations, the 7th Street Metro rail transit station, and the Pershing Square Metro rail transit station. The Project Site is also located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. Accordingly, the Modified Project’s aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. Notwithstanding the aforementioned, the following aesthetic analysis is provided for disclosure purposes.

Scenic Vistas

Pursuant to the L.A. CEQA Thresholds Guide, a significant impact may occur if the proposed project includes a proposal to develop or allow development in an existing natural open space area, or has the potential to introduce features that would block or detract from the existing valued aesthetic quality of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views

¹ SB 743 is codified as Public Resources Code Section 21099.

(visual access to a particular object, scene, or feature of interest). An analysis of the Modified Project's potential to impact panoramic and focal views is thus provided below.

Panoramic Views

As concluded in the 2007 IS/MND, panoramic views within the vicinity of the Project Site consist of the downtown skyline. At street level views of downtown are largely confined by the existing street walls, street level landscaping and existing buildings, which is characteristic of the urban setting. Views of the downtown skyline are primarily visible from a distance from vantage points along the Santa Monica freeway (I-10), the Harbor/Pasadena freeway (I-110/SR-110) and the Hollywood freeway (US-101). In a few blocks radius of the Project Site, there are numerous commercial, office, restaurant, parking, and residential land uses ranging in height from two to over thirty stories above grade. Photographs of the land uses immediately surrounding the Project Site are provided in Figure II-5, Photographs of the Surrounding Land Uses. To the west of the Project Site, across S. Hill Street, is a 12-story commercial building, approximately 160 feet in height (the Coast Federal Savings building), and a 33-story mixed-use residential tower, approximately 375 feet in height, with a five level parking structure (the Level building) (See Figure II-5, Views 9, 10 and 11). Additionally, the property located at 826 S. Olive Street, to the west across S. Hill Street, has been approved for a 50-story mixed-use residential building (See related project No. 26 of Table II-5 of the Project Description) and is currently undergoing site clearing. To the east of the Project Site is a 13-story residential building, approximately 264 feet in height (the Eastern Columbia building), and a 2½ story parking garage with ground floor commercial space (See Figure II-5, View 7, 8 and 9). To the immediate north of the Project Site is a 9-story commercial building, approximately 155 feet in height (the Broadway Trade Center, See Figure II-5, View 12). To the south of the Project Site, across from W. 9th Street, is a four-story commercial and office mixed-use building approximately 76 feet in height (the May Company garage) and a one story commercial building (See Figure II-5, View 8 and 10). The Modified Project includes the development of a 27-story mixed-use building (320 feet in height above grade). As shown in Table III-1, Massing of Surrounding Buildings, although the Modified Project includes an increase of 66,667 square feet of floor area for a FAR of 7.45:1, as compared to the Original Project, the Modified Project would be within the range of the massing of the existing surrounding buildings, several of which were constructed after 2006. Further, the Modified Project results in an increase of 6 stories in building height (approximately 74 feet), as compared to the Original Project; however, the difference in height is keeping with the surrounding urban form where a variety of building heights in commonplace. Therefore, the Modified Project would not adversely affect the existing visual access to panoramic views within the vicinity of the Project Site and no new impact would occur.

**Table III-1
Massing of Surrounding Buildings**

Site	Lot Area	Floor Area	FAR
Coast Federal Savings Building	15,115	163,608	10.82
Level Building	53,521	321,130	6.00
Eastern Columbia Building	22,624	267,478	11.82
Eastern Columbia Parking Garage	19,606	76,689	3.91
Broadway Trade Center	117,813	835,860	7.09
May Co. Parking Garage	22,177	194,390	8.77
One-Story Commercial Building	6,574	24,105	3.67

Source: Craig Lawson & Co., February 2016

Focal Views

Pursuant to the Central City Community Plan, the Project Site is located in the South Park area and Historic Core area of downtown Los Angeles. As discussed in the Historic Assessment (See Appendix H of this IS/MND Addendum), the Project Site is just outside the boundary of the Broadway Theater and Commercial District that encompasses the parcels extending just north of 3rd Street and south of 9th Street and to the rear property lines of the buildings which face Broadway. Several historic building are located adjacent to the Project Site which include: (1) The former May Company Department Store (Broadway Trade Center), located on the adjacent parcel north of the project site on the southwest corner of S. Broadway and W. 8th Street; (2) The Eastern Columbia building, located east of the Project Site at the northwest corner of S. Broadway and W. 9th Street; (3) The former Coast Federal Savings building, located at the northwest corner of S. Hill Street and W. 9th Street on the opposite side of Hill Street from the Project Site; and (4) The former May Company garage, located at the southeast corner of S. Hill Street and W. 9th Street on the opposite side of W. 9th Street from the Project Site.

The Modified Project has the potential to block views and obscure public sight lines to the west façade of the Eastern Columbia building and the south façade of the Broadway Trade Center. The proposed 27-story building (320 feet in height above grade) would partially block the west façade of the Eastern Columbia building, particularly from the west along 9th Street, and the south façade of the Broadway Trade Center. However, both are secondary façades and would remain partially visible from the south and southwest, due to the 10-foot street dedication along 9th street. The podium component of the Modified Project would be constructed abutting the Broadway Trade Center building to the north (approximately 18 inches from the property line) and set back from the Eastern Columbia building by approximately 46 feet to the east. The tower component of the Modified Project would be separated by a 25-foot six-inch setback from the Broadway Trade Center to the north. As shown in Figure II-24, Basis of Design, the tower component of the Modified Project would be separated by an 81-foot setback from the Eastern Columbia building to the east and separated by a 176-foot setback from the Eastern Columbia building's clock tower. These setbacks provide a buffer space between the two buildings on the 9th Street facades so that views of the Eastern Columbia building's iconic massing and highly decorated south-facing façade and clock tower would remain intact and the historical resource would retain its visual prominence (See Figure II-19, 9th Street Contextual Elevation). The west façade of the Eastern Columbia building is largely

devoid of the articulation and decorative elements that characterize the primary, street-facing facades. The west-facing wall of the Eastern Columbia building and south-facing wall of the Broadway Trade Center were originally constructed in recognition of potential new construction on the neighboring lot at the northeast corner of 9th Street and Hill Street, which explains the utilitarian appearance of both building's facades.

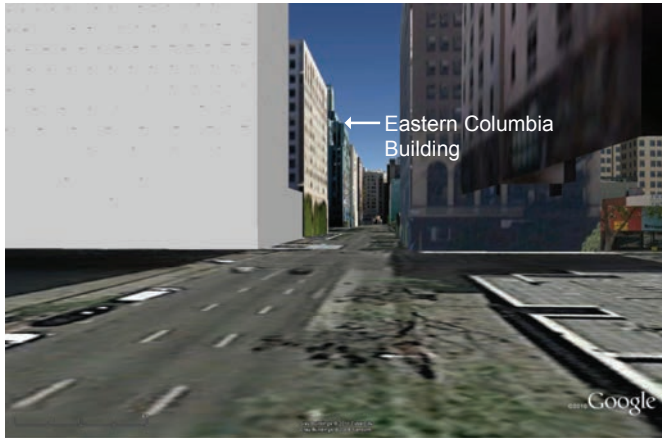
Existing views of the Eastern Columbia building's clock tower, and views from the same vantage points with the Modified Project included, are shown in Figures III-1 through III-4. Views along 9th Street (between Olive Street and Hill Street, to the west of the Project Site) were analyzed at street-level to examine impacts of the Modified Project on existing views of the Eastern Columbia's building west facing façade of the clock tower. Views along Hill Street (between 8th Street, to the north of the Project Site, and Olympic Boulevard, to the south of the Project Site) were analyzed at street-level to examine impacts of the Modified Project on existing views of the west and south facing façade of the Eastern Columbia's Building clock tower. Figures III-1 through III-4 depict both the existing view and the proposed view with respect to the Modified Project's proposed height and massing. As shown in Figures III-1 (Views 1 and 2) and Figure III-2 (Views 3 and 4), views of the Eastern Columbia building's west facing clock tower, looking east and northeast along 9th Street (between Olive Street and Hill Street), are mostly obstructed by existing buildings and thus views of the west facing clock tower would not be significantly impacted by the addition of the Modified Project. As depicted in Figure III-3 (View 5) the existing view of the Eastern Columbia building's south facing clock tower, looking northeast from S. Hill Street would remain intact with the addition of the Modified Project. Figure III-3 (View 6) indicates that the south facing clock tower is largely obstructed by the May Company garage and that the Modified Project would not adversely affect this view. Additionally, as shown in Figure III-4 (View 7), views of the Eastern Columbia building's west facing clock tower, looking southeast along S. Hill Street are not visible from street level and thus the addition of the Modified Project would not impact existing views along this corridor.

The Modified Project's rectangular plan, the solid six-story massing of its podium, the pedestrian-oriented retail storefronts along its ground floor street frontage, and the articulation of its façades, reflect the massing, orientation, and articulation of the adjacent and surrounding historic buildings. The Modified Project exhibits several design elements that reinforce its compatibility with adjacent historical resources over that of the Original Project. The podium of the Modified Project includes common design characteristics shared with adjacent historic resources and the historic district. The west and south façades of the Modified Project's podium would be articulated vertically with clearly defined bays that echo the rhythm of the structural bays of the adjacent Broadway Trade Center and May Company garage. The podium would be articulated horizontally to align with the Broadway Trade Center's base, cornice, and windows and recall similar cornice lines and belt courses on the nearby May Company garage. The primary entrance on Hill Street feature three tall rectangular bays with precast concrete surrounds that recall the size, proportions, and materials of the prominent central entrance portals with cast-stone surrounds of nearby historic buildings, especially that of the historic Coast Federal Savings building across Hill Street.

Articulation of the podium and tower façades are varied to differentiate base, middle and top sections that recall the tripartite stacked arrangements of the adjacent Broadway Trade Center and the nearby Coast Federal Savings building and May Company garage. Above the glazed storefronts at ground level, the podium levels are clad with perforated metal panels and vertical metal louvers. The tower of the Modified Project features exposed slab edges and residential balconies forming continuous horizontal bands that echo the horizontal rhythm of windows and spandrels characteristic on the Broadway Trade Center's Hill Street façade. The same rhythm is also found on the Coast Federal Savings building across Hill Street and the May Company garage across 9th Street. The modulation of the tower's corner balconies recalls the corner setbacks of the adjacent Eastern Columbia building. The tower portion of the new building would be set back above the podium level along the north and east façades, providing a spatial buffer between the new construction and the two adjacent historic buildings so that the height of the new building would be more compatible with the Broadway Trade Center and Eastern Columbia buildings when viewed from Hill Street and 9th Street.

As such, the Modified Project would not materially alter the setting of the Eastern Columbia, Broadway Trade Center, Coast Federal Savings, or former May Company garage buildings within the historic district. Although the Modified Project is approximately six stories taller than the Original Project and the tower of the Eastern Columbia building, as demonstrated in Figures III-1 through III-4, which depict both the existing view and the proposed view with respect to the Modified Project's proposed height and massing, and existing development in the project area, the Eastern Columbia building would remain visibly prominent and unobstructed when viewed from the building's primary north, east and south façades. Due to the increased setback between the tower of the Modified Project and the Eastern Columbia building, views of the Eastern Columbia building would remain unobstructed from the southeast along 9th Street. As views of the Eastern Columbia building's west facing clock tower, looking southeast along S. Hill Street are not visible from street level, the addition of the Modified Project would not impact existing views along this corridor.

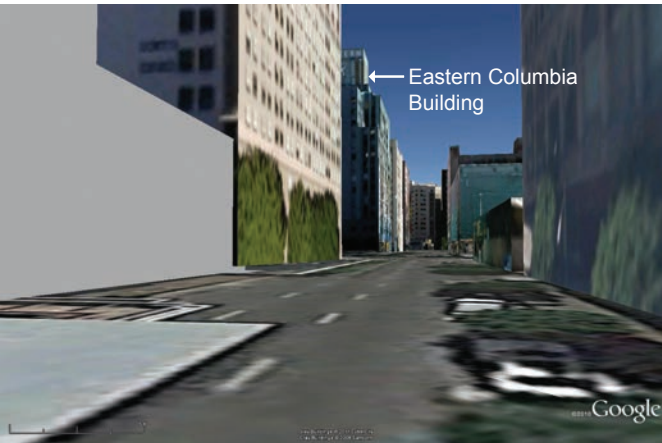
The Modified Project includes podium-level open space to provide a spatial buffer between the existing buildings and the new construction so that the south façade of the Broadway Trade Center and the west façade of the Eastern Columbia building would remain viewable despite some visual obstruction from the street. Therefore, similar to the Original Project, the Modified Project would have a less than significant impact on scenic vistas within the project vicinity.



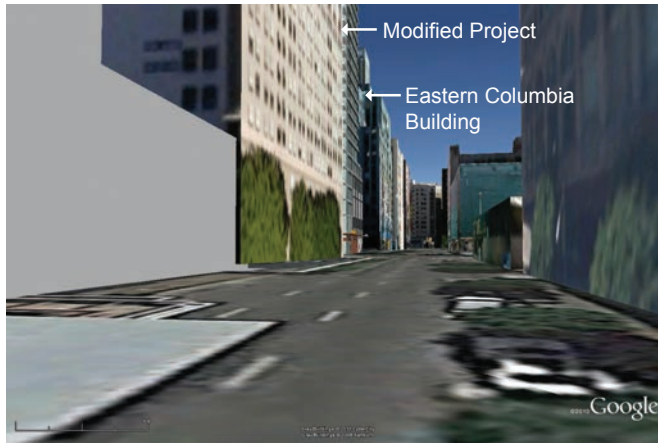
View 1(a): Existing, looking east from 9th Street



View 1(b): Proposed, looking east from 9th Street



View 2(a): Existing, looking east from 9th Street



View 2(b): Proposed, looking east from 9th Street



Source: RTKL, February 5, 2016



View 3(a): Existing, looking east from 9th Street



View 3(b): Proposed, looking east from 9th Street



View 4(a): Existing, looking northeast from 9th Street



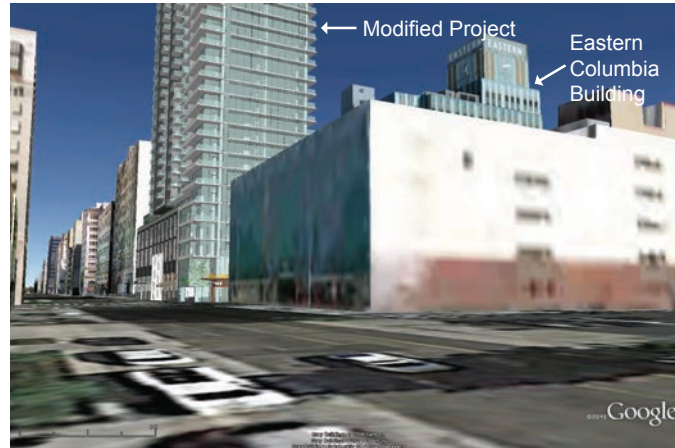
View 4(b): Proposed, looking northeast from 9th Street



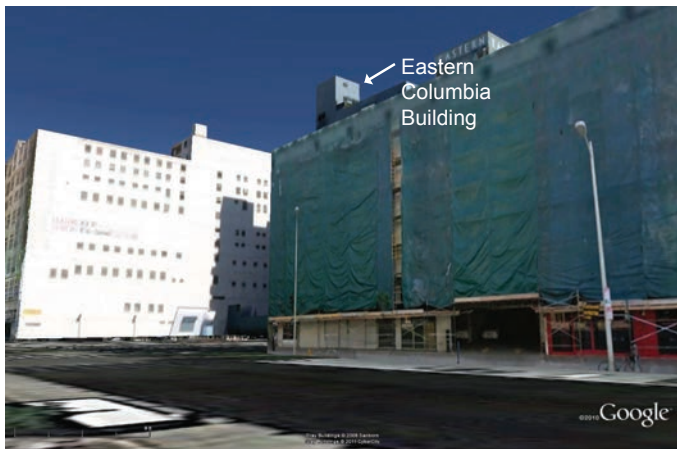
Source: RTKL, February 5, 2016



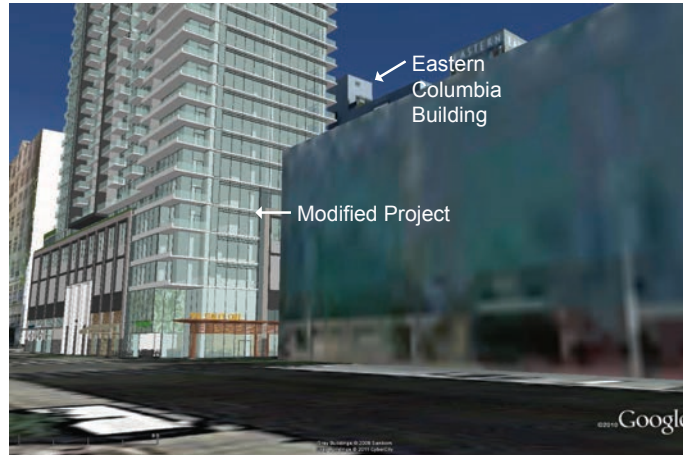
View 5(a): Existing, looking northeast from Hill Street



View 5(b): Proposed, looking northeast from Hill Street



View 6(a): Existing, looking northeast from Hill Street



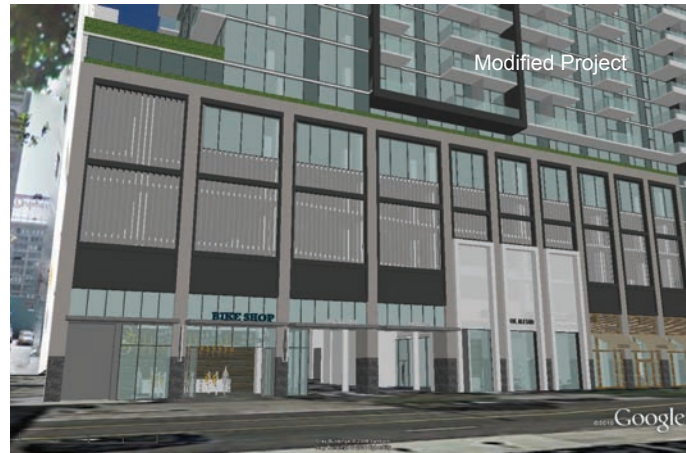
View 6(b): Proposed, looking northeast from Hill Street



Source: RTKL, February 5, 2016



View 7a: Existing, looking southeast from Hill Street



View 7b: Proposed, looking southeast from Hill Street



Source: RTKL, February 5, 2016

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

Where Public Resources Code Section 21099 is not applicable, the City's CEQA thresholds provide that a significant impact may occur if scenic resources would be damaged and/or removed by development of a project.

Original Project

No Impact. The 2007 IS/MND concluded that because there are no City or State-designated scenic highways within the vicinity of the project area the Original Project would have no impact relative to scenic resources within a designated scenic highway. In addition, the Original Project would not substantially damage any interesting scenic resources that occur in the project area including views of the City skyline, the Eastern Columbia building and the Broadway Trade Center. Therefore, no impact to a scenic resource within a scenic highway would occur.

Modified Project

No Impact. Public Resources Code Section 210999 exempts aesthetics impacts of an infill project from being considered significant impacts, and identical to the findings of the 2007 IS/MND, there are no City or State-designated scenic highways within the vicinity of the project area. Further, the Project Site does not contain any scenic resources. The Project Site is currently developed with a surface parking lot. There is no vegetation or unique geologic features on-site.

As discussed above, the Project Site is located within the South Park and Historic Core neighborhoods of the Central City Community Plan, in downtown Los Angeles, and outside the boundary of the National Register listed Broadway Theater and Commercial District (a historic district). Adjacent to the Project Site are several historic buildings including the Eastern Columbia building, the Coast Federal Saving building, the May Company garage, and the former May Company Department Store, known as the Broadway Trade Center. As discussed in response to Checklist Question I (a), above, the Modified Project has been designed in a manner that respects the scale and massing of the historic buildings in the immediate project vicinity, with distinguishing breaks in height and step-backs that align with the historic height datum of the surrounding buildings. The Modified Project would not materially alter the setting of the Eastern Columbia, Broadway Trade Center, Coast Federal Savings, or former May Company garage buildings within the historic district. As depicted in Figure II-25 Design Guidelines Diagram, the Modified Project is separated from the Eastern Columbia building by an outdoor space located on the west side of the Eastern Columbia building which creates separation between the historic building and the Modified Project. The tower component of the Modified Project would be separated by an approximately 25-foot six-inch setback from the Broadway Trade Center to the north. As shown in Figure II-24, Basis of Design, the tower component of the Modified Project would be separated by an approximately 81-foot setback from the Eastern Columbia building to the east and separated by an approximately 176-foot setback from the Eastern Columbia building's clock tower. These distances provide a buffer space between the two buildings on the 9th Street facades so that views of the Eastern Columbia building's

iconic massing and highly decorated south-facing façade would remain intact and the historical resource would retain its visual prominence. The west façade of the Eastern Columbia building is largely devoid of the articulation and decorative elements that characterize the primary, street-facing facades. The west-facing wall was originally constructed in recognition of potential new construction on the neighboring lot, which explains its utilitarian appearance. The proposed building would be physically separated from the majority of the surrounding historic resources and would not physically impact those resources (See Figure II-20, 9th Street Contextual Elevation and Figure II-21 Hill Street Contextual Elevation). Additionally, as depicted in Figures III-1 through III-4, and discussed above in Checklist Question I (a), views of the Eastern Columbia building's clock tower would not be significantly impacted by the addition of the Modified Project. As the Project Site is not bordered by or within the viewshed of any City designated scenic highway as designated by the City's Mobility Plan², the Modified Project would not damage and/or remove any scenic resources within a State or City designated scenic highway, and no impact would occur.

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

Where Public Resources Code Section 21099 is not applicable, which exempts aesthetics impacts of an infill project from being considered significant impacts, the City's CEQA thresholds provide that a significant impact may occur if the Project were to introduce features that would detract from the existing valued aesthetic quality of a neighborhood, community, or localized area by conflicting with important aesthetic elements or the quality of the area (such as theme, style, setbacks, density, massing, etc.) or by being inconsistent with applicable design guidelines.

Original Project

Potentially Significant Unless Mitigation Incorporated. At the time the 2007 IS/MND was prepared, the Project Site was being utilized as a staging area for construction of the parking structure that was underway to the east of the Project Site. As a result, the existing visual character of the Project Site was somewhat degraded due to the construction activity. The 2007 IS/MND concluded that the development of the Original Project would not adversely impact the existing visual quality of the Project Site and project vicinity. Construction of the Original Project would cause disruption and visual clutter that would be typical of any major construction site. With implementation of mitigation to require graffiti monitoring during construction (Mitigation Measure 1) the impact of the Original Project, relative to the existing visual quality of the Project Site, would be mitigated to a less than significant level.

² *City of Los Angeles, Mobility Plan 2035, Inventory of Designated Scenic Highways (pgs. 162- 166).*

Mitigation Measures:

1. The Applicant shall ensure, through appropriate postings and daily visual inspections, that no graffiti and unauthorized materials are posted on any temporary construction barriers, pedestrian walkways, or other structures, and that any such temporary barriers and walkways shall be maintained in a visually attractive manner throughout the construction period.

Modified Project

Potentially Significant Unless Mitigation Incorporated. The Modified Project includes the demolition of the existing surface parking lot located on the Project Site and the construction of a 27-story mixed-use residential tower (320 feet in height above grade) with ground floor retail with parking one level below grade, at grade and four levels of above grade parking. The Modified Project would include an additional six stories (approximately 74 feet) as compared to the Original Project. Similar to the Original Project, the Modified Project would not adversely impact the existing visual quality of the Project Site and project vicinity. With respect to construction impacts on the visual quality of the Project Site, in addition to Mitigation Measure 1 of the 2007 IS/MND, Regulatory Compliance Measure RC-AES-1 and RC-AES-2 would be required, pursuant to the LAMC, to further safeguard the visual quality of the Project Site. Thus, with adherence to Mitigation Measure 1 and the Regulatory Compliance measures identified below, impacts related to the general aesthetic appearance, upkeep, and character of the Project Site would be less than significant.

Mitigation Measures:

1. The Applicant shall ensure, through appropriate postings and daily visual inspections, that no graffiti and unauthorized materials are posted on any temporary construction barriers, pedestrian walkways, or other structures, and that any such temporary barriers and walkways shall be maintained in a visually attractive manner throughout the construction period.

Regulatory Compliance Measures:**RC-AES-1 (Signage)**

- Compliance with provisions of the Los Angeles Building Code. The project shall comply with the Los Angeles Municipal Code Section 91.6205, including on-site signage maximums and multiple temporary sign restrictions, as applicable.

RC-AES-2 (Signage on Construction Barriers)

- Compliance with provisions of the Los Angeles Building Code. The project shall comply with the Los Angeles Municipal Code Section 91.6205, including but not limited to the following provisions:
- The applicant shall affix or paint a plainly visible sign, on publicly accessible portions of the construction barriers, with the following language: "POST NO BILLS".

- Such language shall appear at intervals of no less than 25 feet along the length of the publicly accessible portions of the barrier.
- The applicant shall be responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence.

Building Heights and Massing

Original Project

The 2007 IS/MND analyzed the development of a 21-story tower (approximately 246 feet in height) on the northern portion of the Project Site and a one-story ground floor retail structure on the southern portion of the Project Site, which connects to the ground floor lobby of the residential tower. The Original Project included 190,902 square feet of Floor Area with a FAR of 6:1. As concluded in the 2007 IS/MND, the Original Project would be consistent with the height and massing of the existing buildings surrounding the Project Site, which included mid- and high-rise buildings located to the north, south, east and west of the Project Site.

Modified Project

The Project Site is currently developed with surface parking. Buildings in the vicinity of the Project Site vary in building massing and height. In a few blocks radius of the Project Site, there are numerous commercial, office, restaurant, parking, and residential land uses ranging in height from two to over thirty stories above grade. Structures directly adjacent to the Project Site primarily range between two- to 13-stories and consist primarily of mixed-use buildings and parking structures. The Project Site is located in Height District No. 4, which does not specify a building height for buildings within C5 Zones. The proposed 27-story building would have a maximum height of 320 feet above grade. Photographs of the land uses immediately surrounding the Project Site are provided in Figure II-5, Photographs of the Surrounding Land Uses. To the west of the Project Site, across S. Hill Street, is a 12-story commercial building, approximately 160 feet in height above grade (the Coast Federal Savings building), and a 33-story mixed-use residential tower, approximately 375 feet in height above grade (the Level building), with a five level parking structure (See Figure II-5, Views 9, 10 and 11). Additionally, the property located at 826 S. Olive Street, to the west across S. Hill Street, has been approved for a 50-story mixed-use residential building (See related project No. 26 of Table II-5 of the Project Description) and is currently undergoing site clearing. Properties to the west are zoned [Q]R5-4D (Multiple Dwelling Zone). The General Plan land use designation is High Density Residential. To the east of the Project Site is a 13-story residential building, approximately 264 feet in height above grade (the Eastern Columbia building), and a 2½ parking garage with ground floor commercial space (See Figure II-5, View 7, 8 and 9). Properties to the east are zoned [Q]C5-4D-CDO (Commercial Zone). The General Plan use designation is Regional Commercial. To the immediate north of the Project Site is a 9-story commercial building, approximately 155 feet in height above grade (the Broadway Trade Center, see Figure II-5, View 12). Properties to the north are zoned C5-4D (Commercial Zone). The General Plan land use designation is Regional Commercial. To the south of the Project Site, across from W. 9th Street, is a four-story commercial and

office mixed-use building approximately 76 feet in height above grade (the May Company garage) and a one story commercial building (See Figure II-5, View 8 and 10). Properties to the east are zoned [QR]R5-4D (Multiple Dwelling Zone). The General Plan land use designation is High Density Residential.

The Modified Project is located in a Transfer of Floor Area Rights (TFAR) Area, as detailed in the LAMC Article 4.5, Transfer of Floor Area Rights – Central City Community Plan and City Center Redevelopment Projects Areas. As discussed in Section II, Project Description, the Applicant seeks an approval for an increase in floor area from the allowable, by-right buildable floor area ratio (FAR) of 6:1 (207,570 square feet for the Project Site) to 7.45:1 (the addition of 49,999 square feet for a total of 257,569 square feet). With approval of this request, the Project would be in conformance with the LAMC and the Central City Community Transfer of Floor Area Rights. The physical height of the Modified Project would not create any significant adverse impacts upon the adjacent land uses. The Project's 27-story building (320 feet in height above grade) proposes three distinguishing breaks in height and step-backs that would produce a visually intriguing façade and visual consistency with surrounding buildings. The Modified Project would include an increase of 66,667 square feet of floor area and an increase of 6 stories in building height (approximately 74 feet) as compared to the Original Project. Identical to the Original Project, the Modified Project would include two ingress/egress driveways; one located on 9th Street and one located on S. Hill Street. As discussed above in Checklist Question I (a), and as shown in Table III-1, Massing of Surrounding Buildings, although the Modified Project includes an increase of 66,667 square feet of floor area for a FAR of 7.45:1, as compared to the Original Project, the Modified Project would be within the range of the massing of the existing surrounding buildings, several of which were constructed after 2006. Further, the increase of 6 stories in building height (approximately 74 feet), as compared to the Original Project, is keeping with the surrounding urban form where a variety of building heights is commonplace. Therefore, impacts with respect to the height and massing of the Modified Project would be less than significant.

Additionally, the Modified Project would be designed and constructed in accordance with the Downtown Design Guide, the Historic Downtown Los Angeles Design Guidelines, the Los Angeles General Plan, and the Central City Community Plan. The project is in substantial conformance with the 2002 Historic Downtown Los Angeles Design Guidelines. Key points for new construction and infill that the project would adhere to include:

- Building to the street and maintaining the established street line.
- Placement of new construction on vacant sites and parking lots.
- Priority to corner sites.
- Encouragement of mixed-use buildings.
- Ground floor retail accessible from the street.
- Prominent building entrances on street-facing facades.
- Creative and contemporary design for new buildings with respect of authentic character of existing context.
- Build consistently with street wall.

By replacing the existing surface parking lot with ground floor storefronts the Modified Project would animate the streetscape in a manner that enhances the surrounding neighborhood by providing a consistent street wall that improves the pedestrian experience. Parking would be provided in one subterranean level, at grade and levels two through five. Level five would support additional parking behind habitable space fronting Hill Street and 9th Street. The Modified Project would include a comprehensive podium screening program that would incorporate precast concrete framing metal panels and vertical louvers along 9th Street and Hill Street to integrate the parking levels with the habitable space above. The design of these levels would also carry the scale and rhythm of the adjacent Broadway Trade Center through the block. As shown in Figure II-23, Enlarged Podium and Screening Diagram and Wall Sections, the Modified Project would enclose the eastern portion of the podium directly facing the adjacent Eastern Columbia building and approximately 63.5 feet of the portion of the podium facing the adjacent parking garage. Design features of the Modified Project are further illustrated in Figure II-24, Basis of Design, and in Figure II-25, Design Guidelines Diagram. For a discussion on the consistency of the Modified Project with the applicable plans and guidelines, refer to Section X., Land Use and Planning of this IS/MND Addendum. Although the Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099, the aesthetic impacts created by the scale and massing of the Modified Project would be less than significant.

Shade/Shadow

Notwithstanding Public Resources Code Section 210999, which exempts aesthetics impacts of an infill project from being considered significant impacts, building shadow is a general condition of the urbanized environment, and is considered an aesthetic issue by the City of Los Angeles, which has established shadow impact standards. In accordance with the *L.A. CEQA Thresholds Guide*, "facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors." These land uses are termed "shadow-sensitive" because sunlight is important to function, physical comfort of commerce. Pursuant to the *L.A. CEQA Thresholds Guide*, a shading impact would normally be considered significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and Late October).

As shown in the shade and shadow exhibits (see Figures III-5 through III-26), the Project Site is generally bounded by commercial uses to the south across 9th Street, to the west across S. Hill Street, and to the immediate north. These properties do not contain any shade sensitive uses. The only shade-sensitive uses that can potentially be impacted by the Project's shadow include amenities associated with the mixed-use residential Eastern Columbia building, located to the immediate east of the Project Site. The Eastern Columbia building includes a ground level utility service yard (west of the Eastern Columbia building), rooftop amenity deck with a swimming pool, and west facing residential balconies. The Project's shadow envelope, and the location of the shadow sensitive amenities associated with the Eastern Columbia

building are provided in the shade and shadow exhibits.

Original Project

As shown in Figures III-5 through III-7, the residential tower of the Original Project would not cast shadows on any portion of the Eastern Columbia building during the winter and summer months. With respect to the lower three levels of the Original Project, as shown in Figures III-8 through III-10, some shading would occur on the adjacent outdoor space associated with the Eastern Columbia building during the winter months at approximately 3:00 p.m. and during the summer months from approximately 2:00 p.m. to 5:00 p.m. However, as one hour during the winter months and three hours during the summer months is within the acceptable thresholds, shading from the Original Project would result in a less than significant impact.

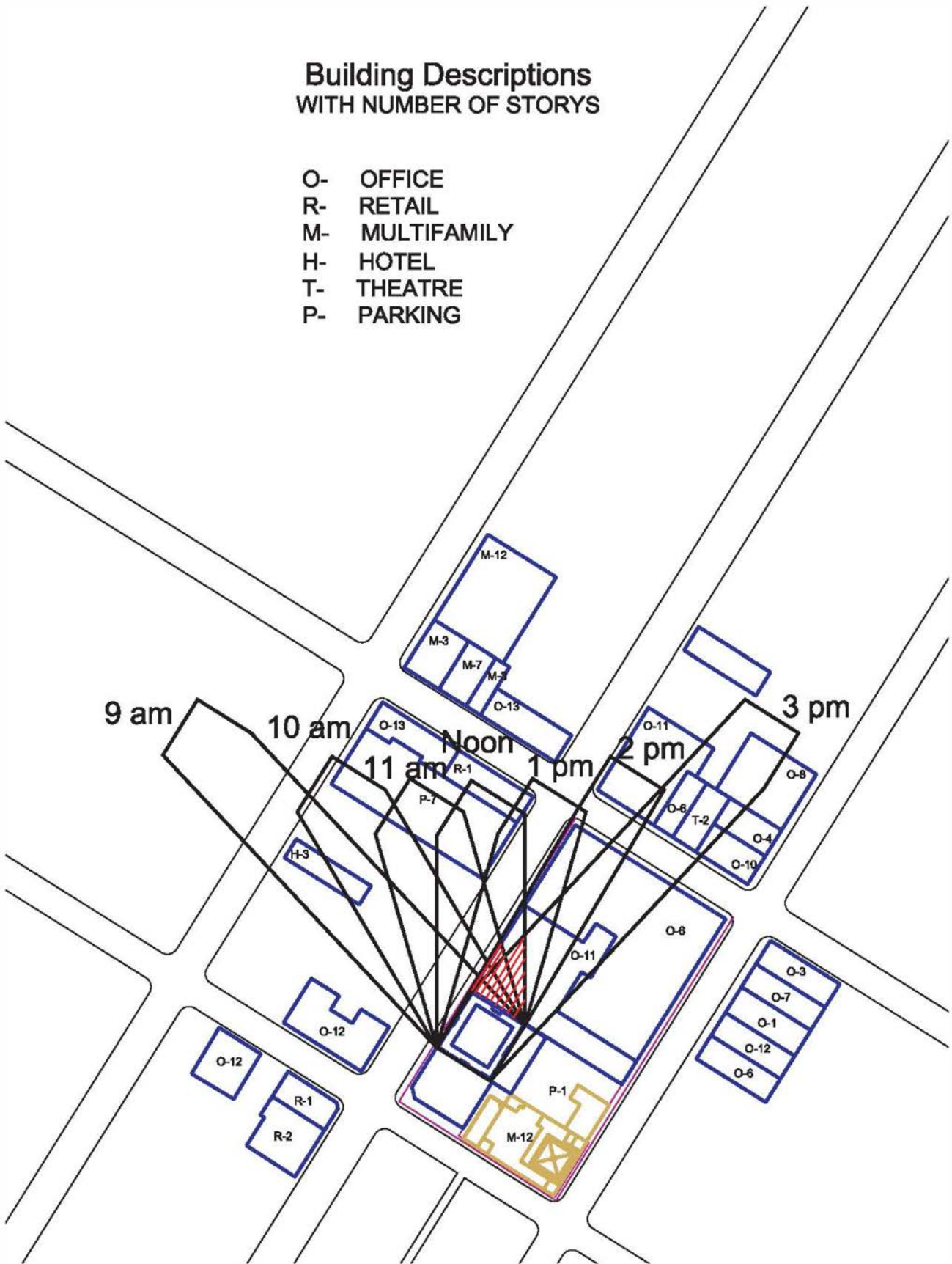
Modified Project

As shown in Figure III-11 through III-17, during the winter months the Modified Project would not cast shadows on the shade sensitive uses associated with the Eastern Columbia building for more than three hours as defined above. Therefore, a less than significant impact would occur with respect to shade sensitive land uses during the winter months. As shown in Figures III-12 through Figure III-14, the Modified Project's sixth level podium (approximately 76 feet in height) would cast a shadow on the northwest corner of the Eastern Columbia building's ground level utility service yard during the hours of approximately 9:00 a.m., 10:00 a.m., and 11:00 a.m. during the summer months. As three hours during the summer months is within the acceptable thresholds, a less than significant impact would occur. As shown in Figures III-18 through Figure III-20, the Modified Project's residential tower (approximately 320 feet in height) would cast a shadow on the northwest portion on the Eastern Columbia building's ground level utility service yard, a portion of the west facing residential balconies, and northern portion of the rooftop amenity deck during the hours of approximately 3:00 p.m., 4:00 p.m., and 5:00 p.m. during the summer months. As three hours during the summer months is within the acceptable thresholds, a less than significant impact would occur. Therefore, the Modified Project would not have the potential to significantly impact any shadow sensitive land uses during the summer months.

Although the Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099, nevertheless, the Modified Project would not exceed the City's threshold of significance for non Public Resources Code Section 21099 uses with regards to any shade-sensitive land uses during the winter and summer months. Therefore, the Modified Project would not have the potential to significantly impact any shadow-sensitive land uses.

Building Descriptions WITH NUMBER OF STORYS

- O- OFFICE
- R- RETAIL
- M- MULTIFAMILY
- H- HOTEL
- T- THEATRE
- P- PARKING



Source: ENV-2006-6302-MND, Figure III-1

Spring/Fall Equinox Shading Diagram

Building Descriptions WITH NUMBER OF STORIES

- O- OFFICE
- R- RETAIL
- M- MULTIFAMILY
- H- HOTEL
- T- THEATRE
- P- PARKING



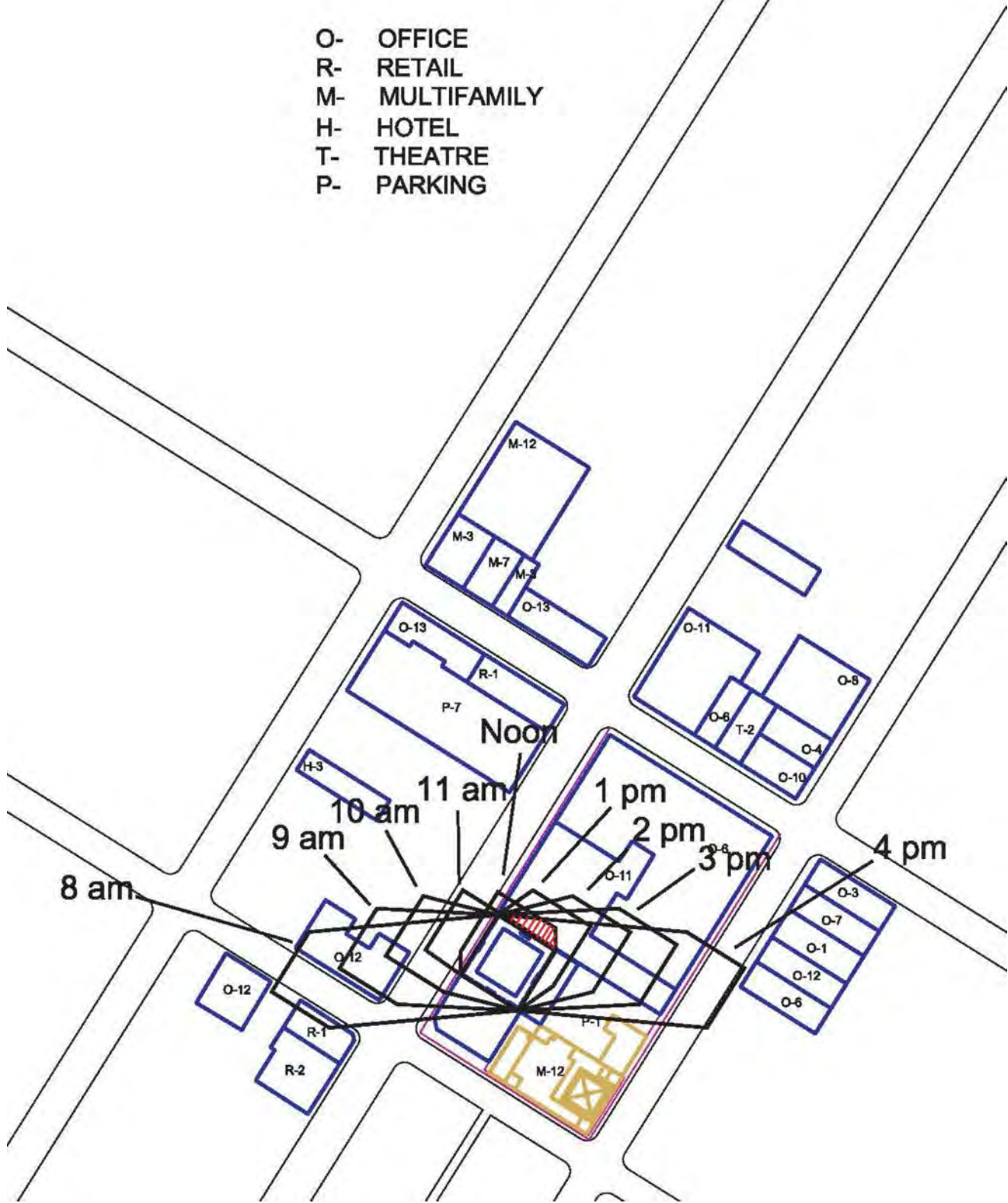
Source: ENV-2006-6302-MND, Figure III-2



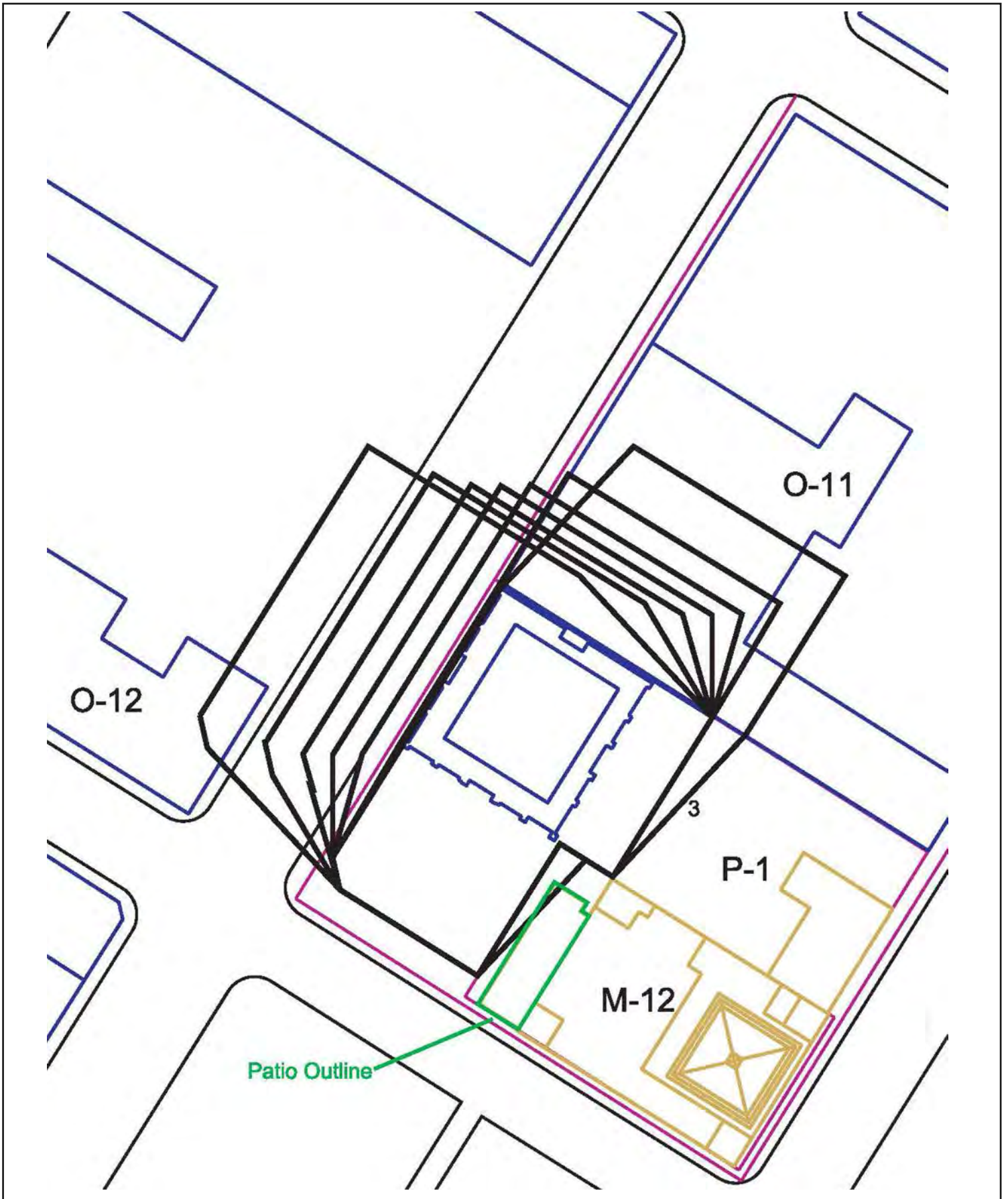
Figure III-6
Original Project - Spring - Fall Equinox Shading Diagram - Tower

Building Descriptions WITH NUMBER OF STORYS

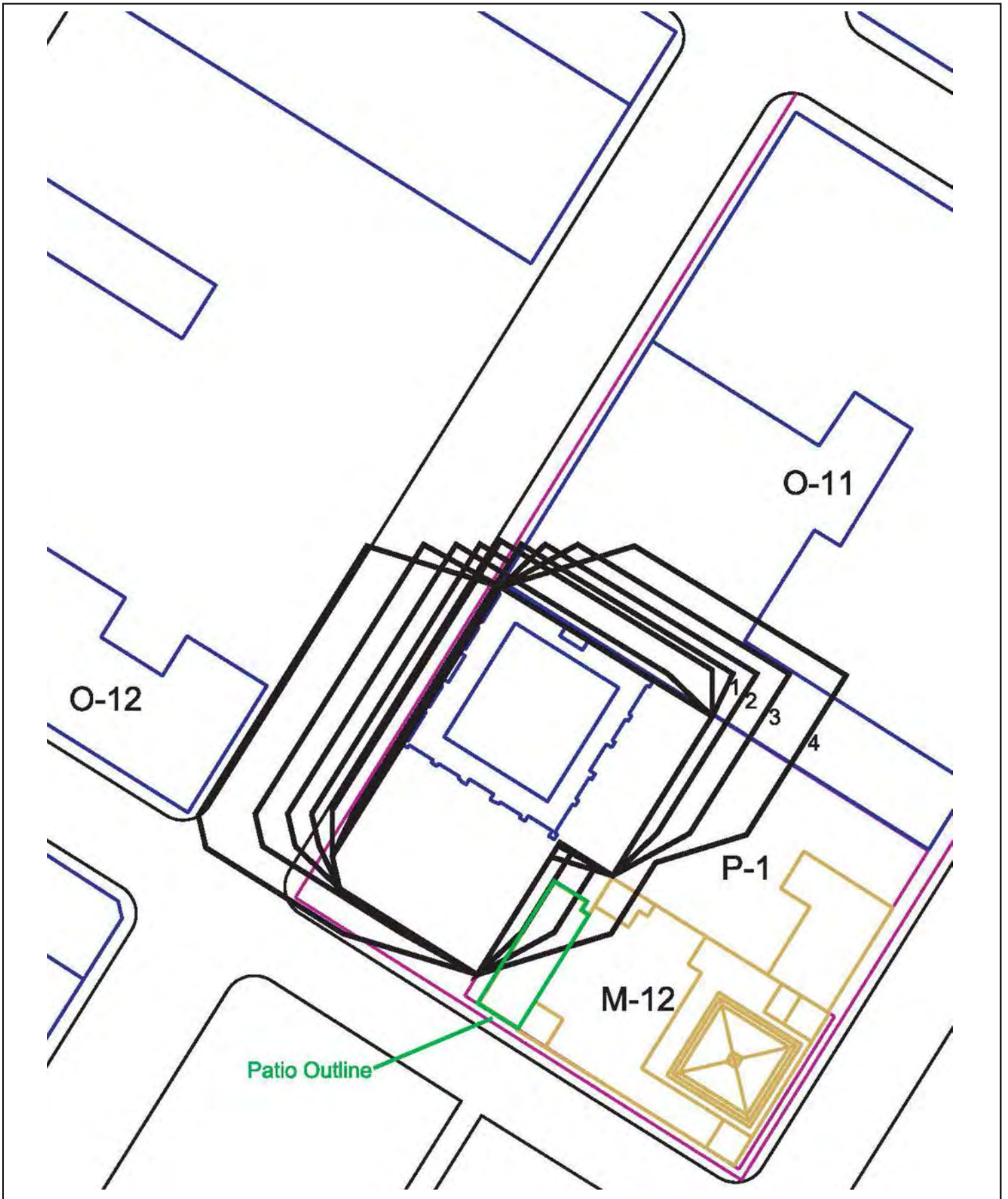
- O- OFFICE
- R- RETAIL
- M- MULTIFAMILY
- H- HOTEL
- T- THEATRE
- P- PARKING



Source: ENV-2006-6302-MND, Figure III-3



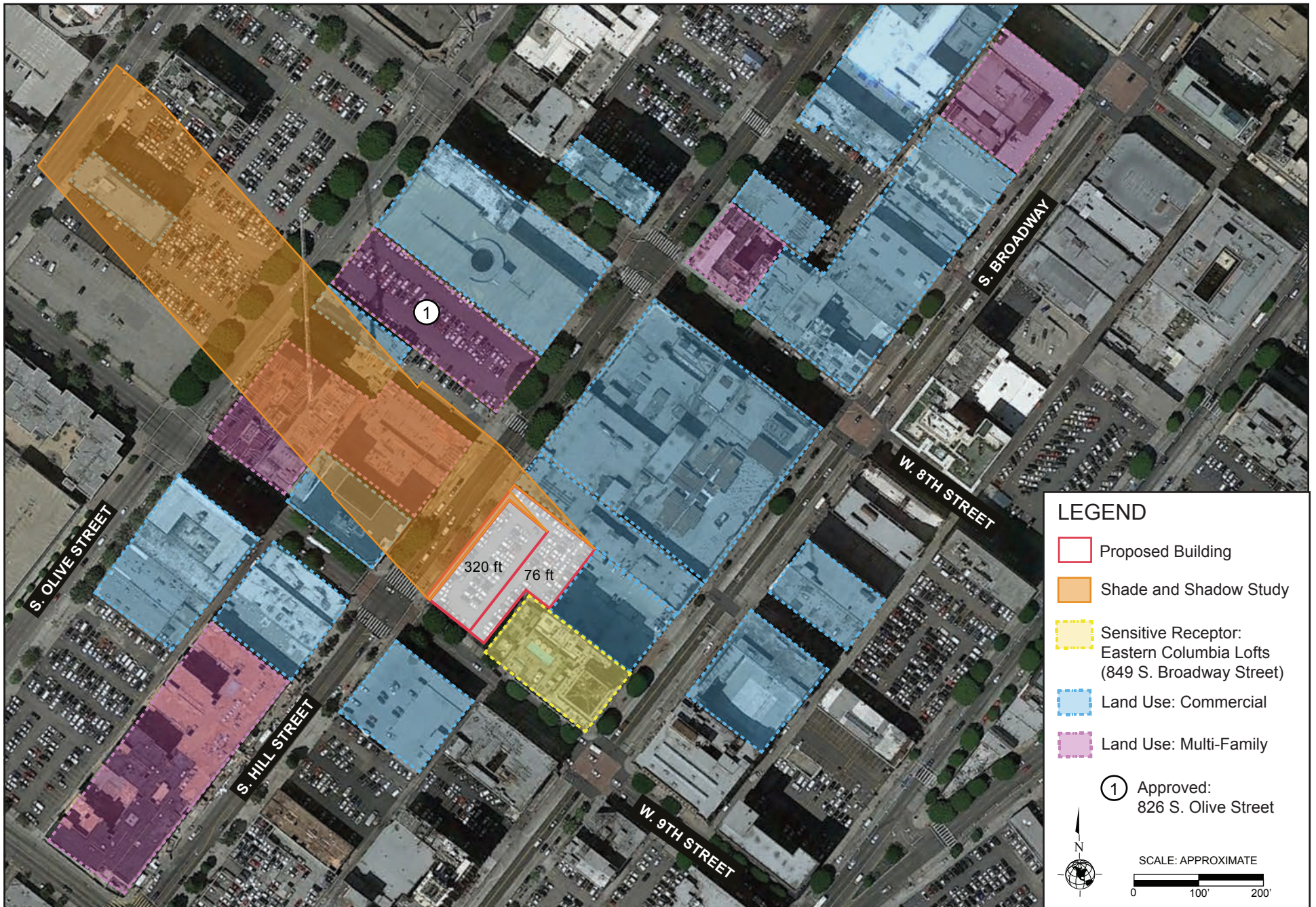
Source: ENV-2006-6302-MND, Figure III-4



Source: ENV-2006-6302-MND, Figure III-5



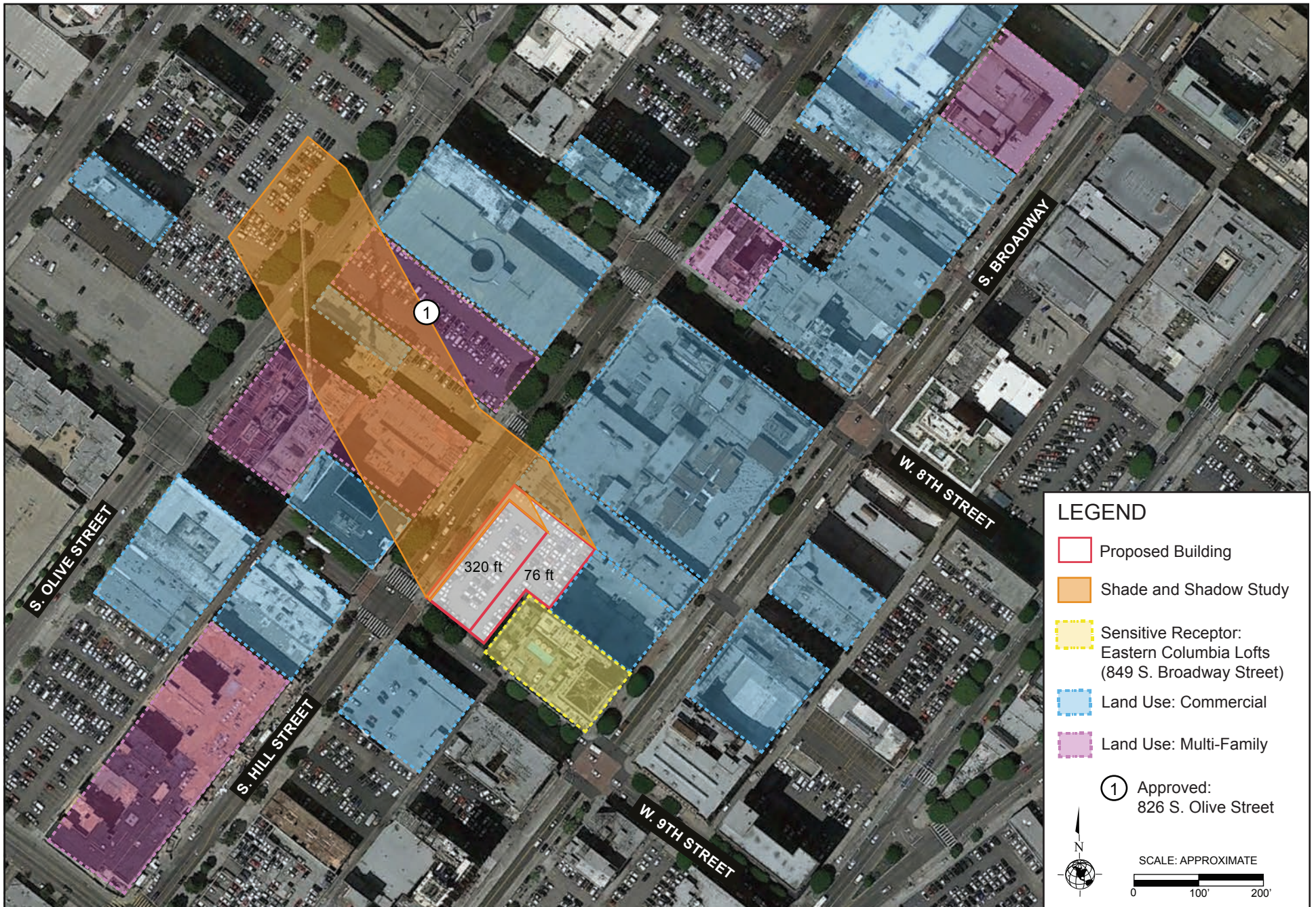
Source: ENV-2006-6302-MND, Figure III-6



Source: Google Earth, Aerial View, 2015



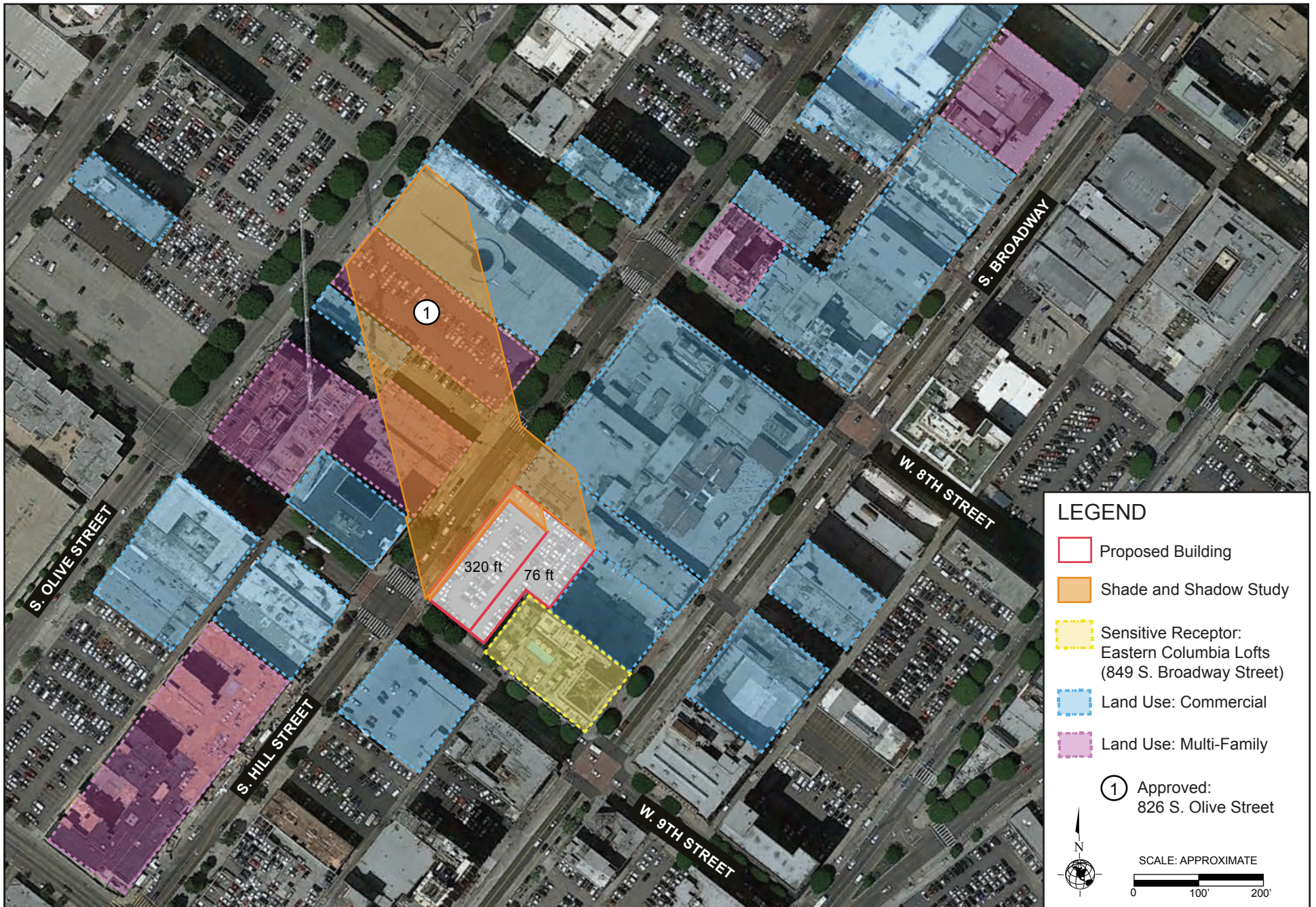
Figure III-11
 Winter Solstice Shadows
 9:00 A.M.



Source: Google Earth, Aerial View, 2015



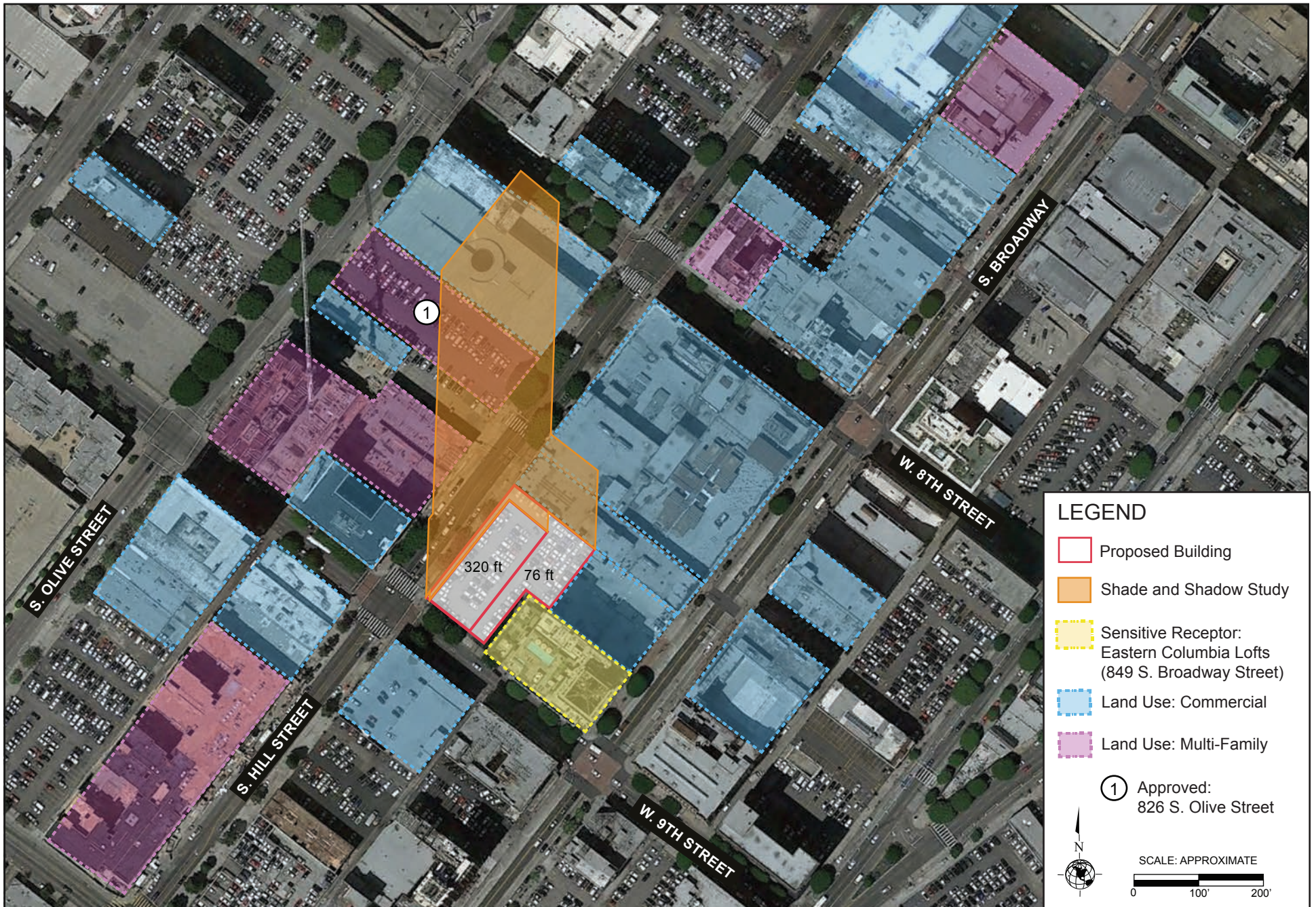
Figure III-12
 Winter Solstice Shadows
 10:00 A.M.



Source: Google Earth, Aerial View, 2015



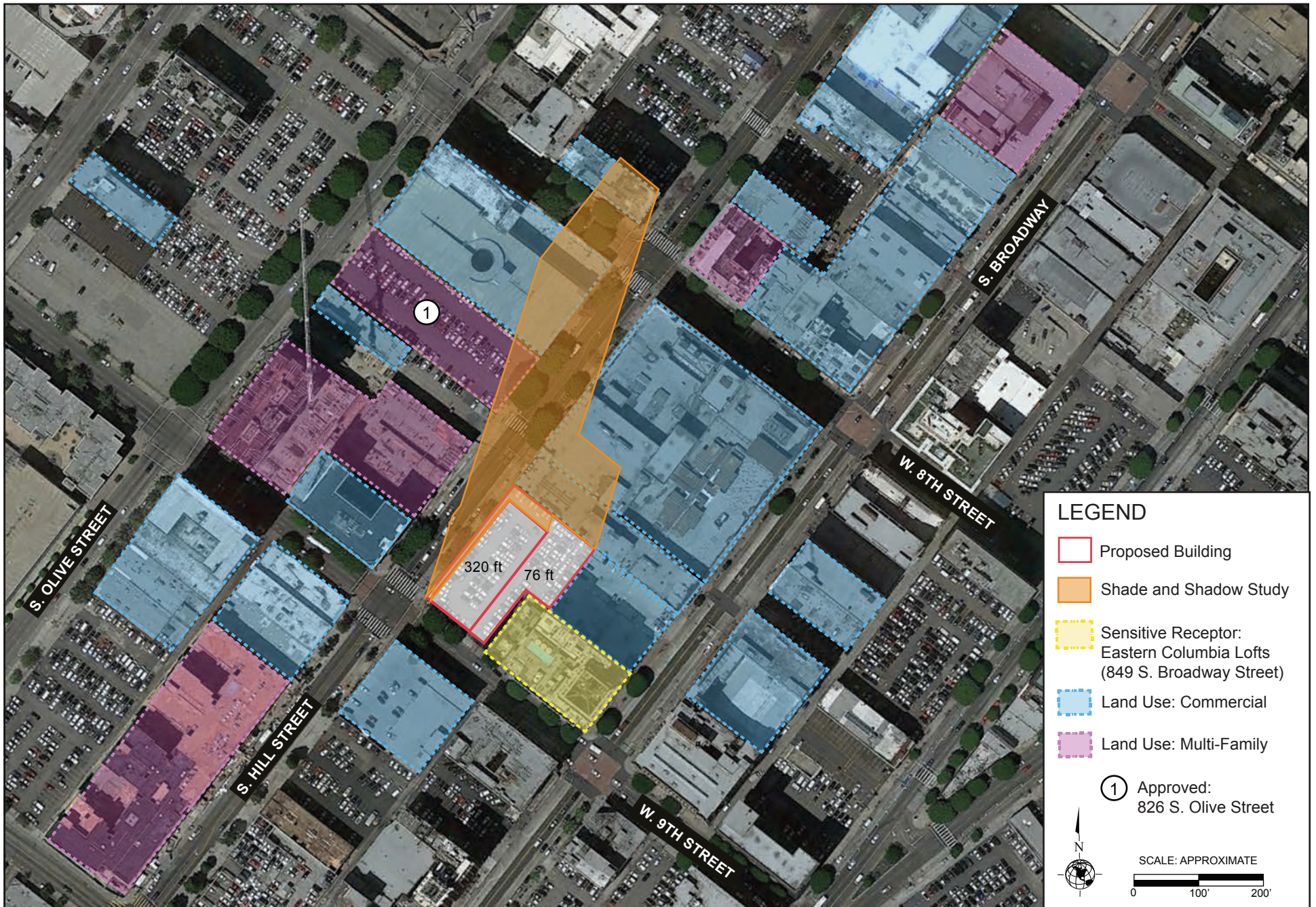
Figure III-13
 Winter Solstice Shadows
 11:00 A.M.



Source: Google Earth, Aerial View, 2015



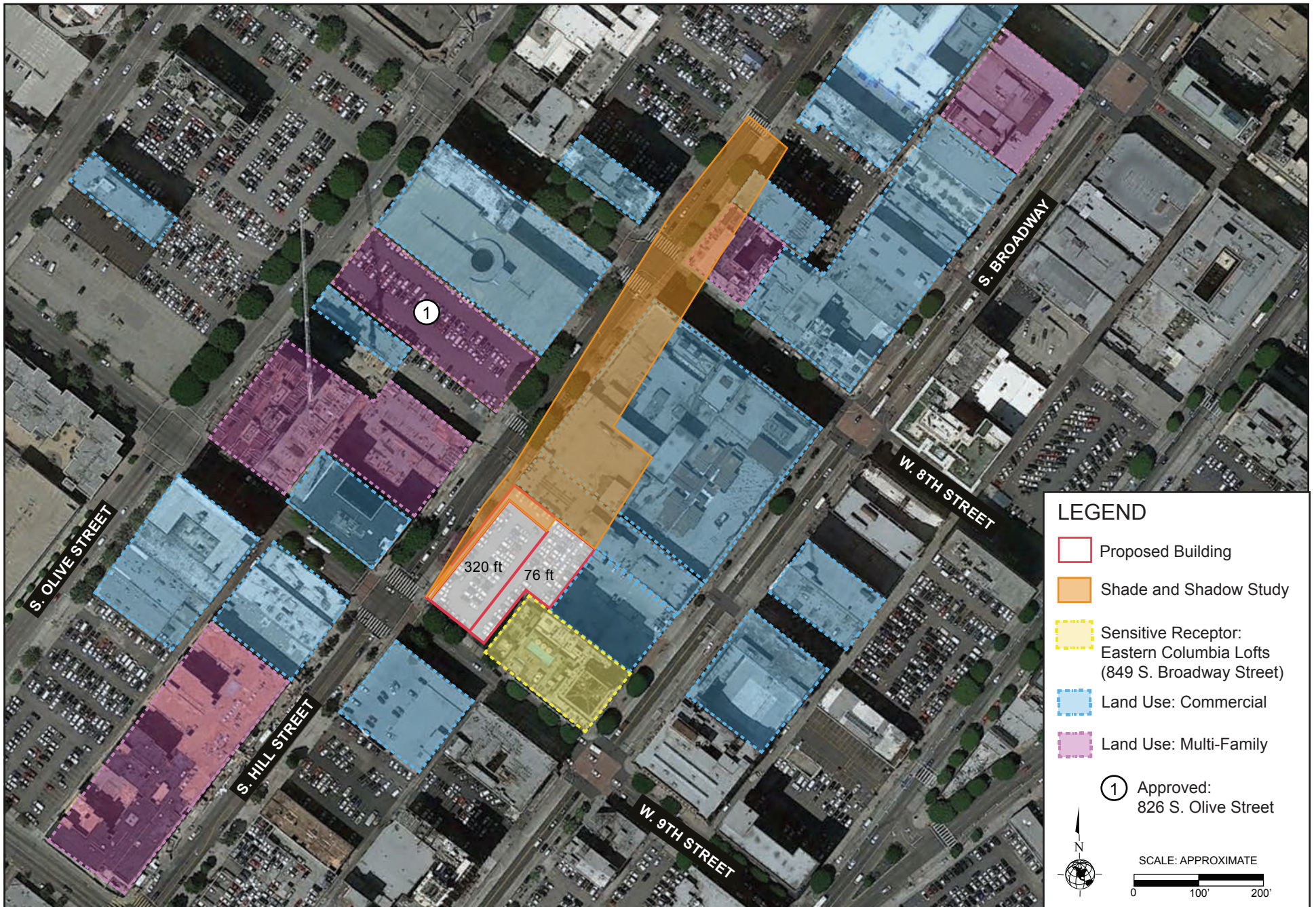
Figure III-14
 Winter Solstice Shadows
 12:00 P.M.



Source: Google Earth, Aerial View, 2015



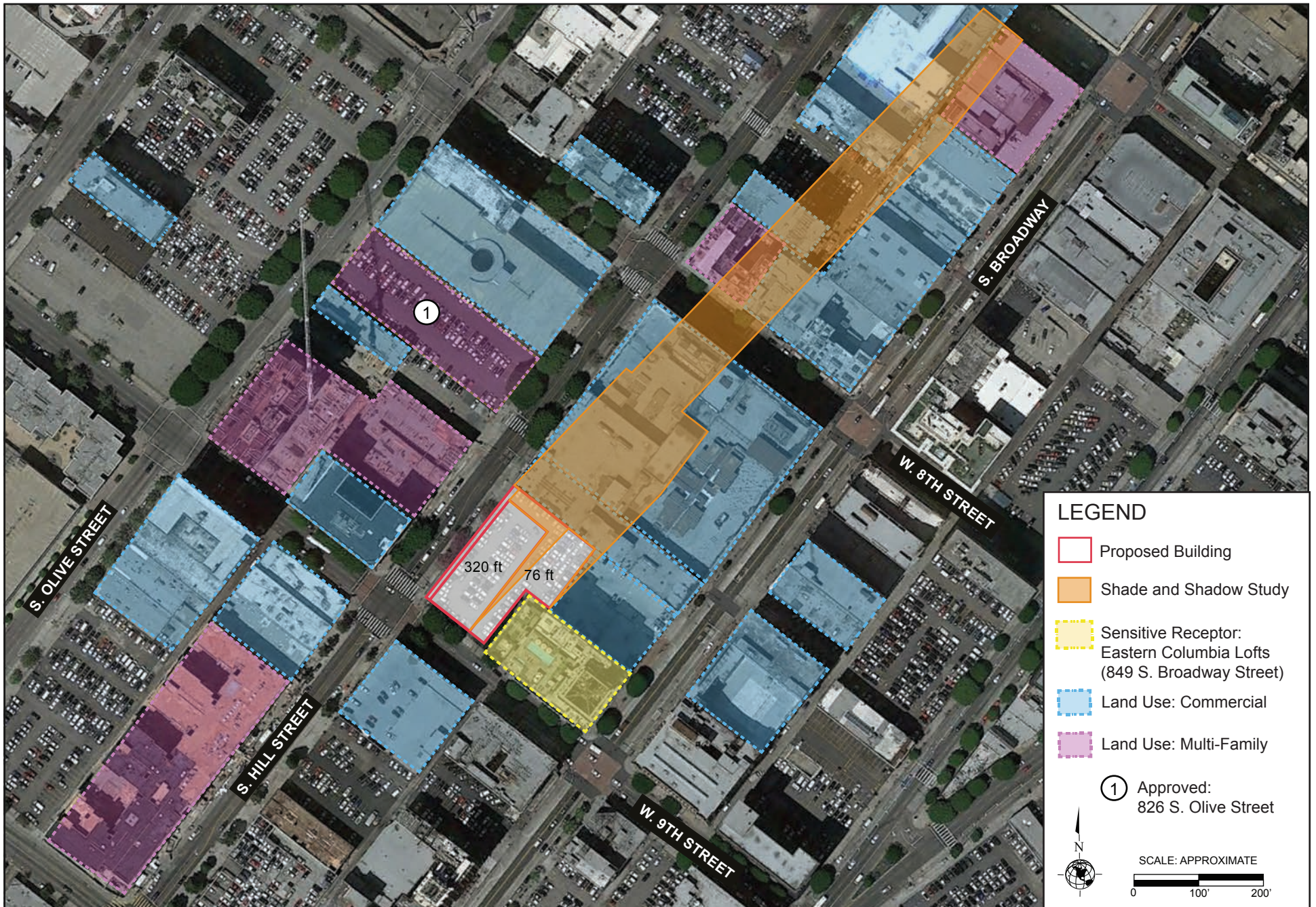
Figure III-15
 Winter Solstice Shadows
 1:00 P.M.



Source: Google Earth, Aerial View, 2015



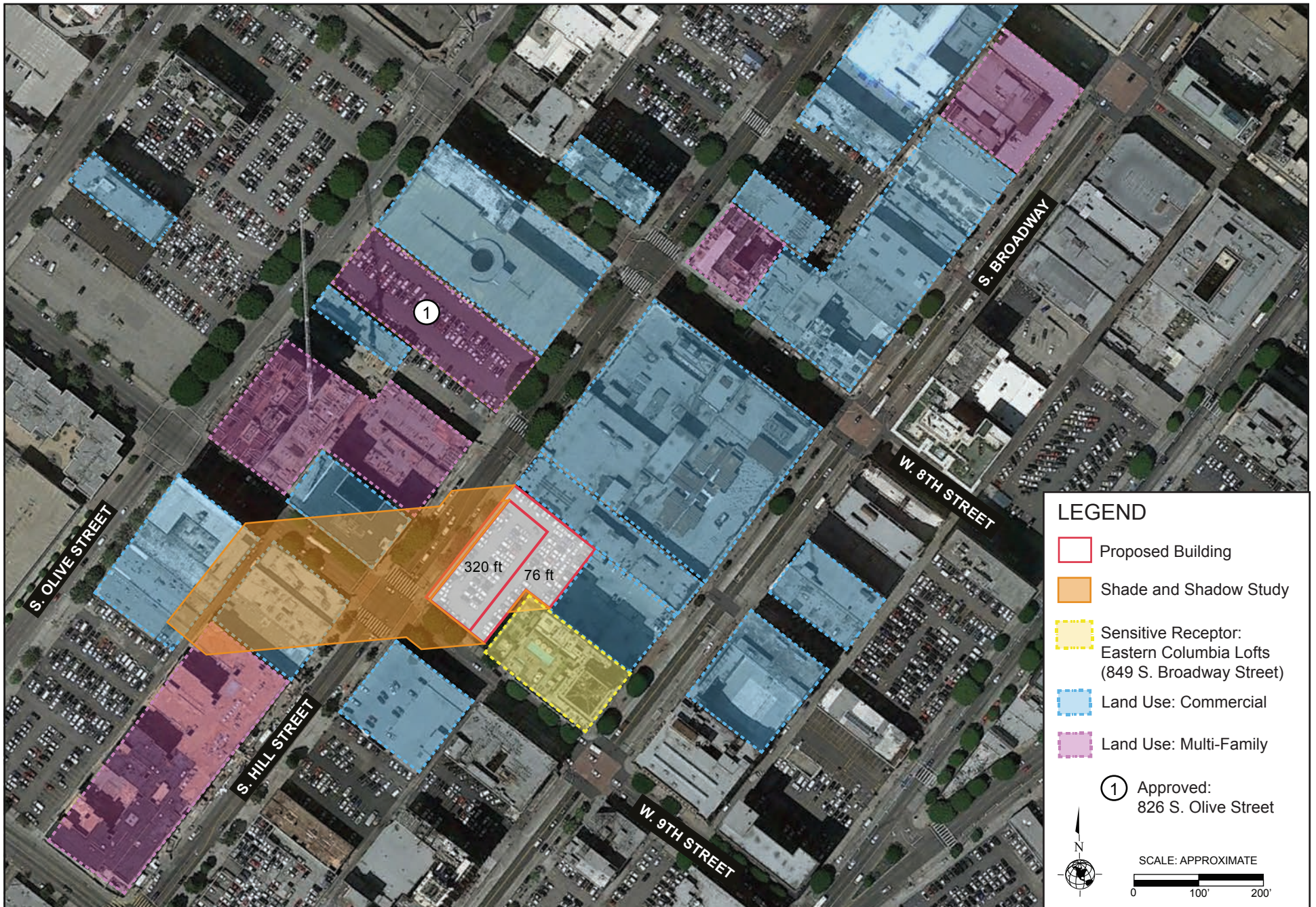
Figure III-16
 Winter Solstice Shadows
 2:00 P.M.



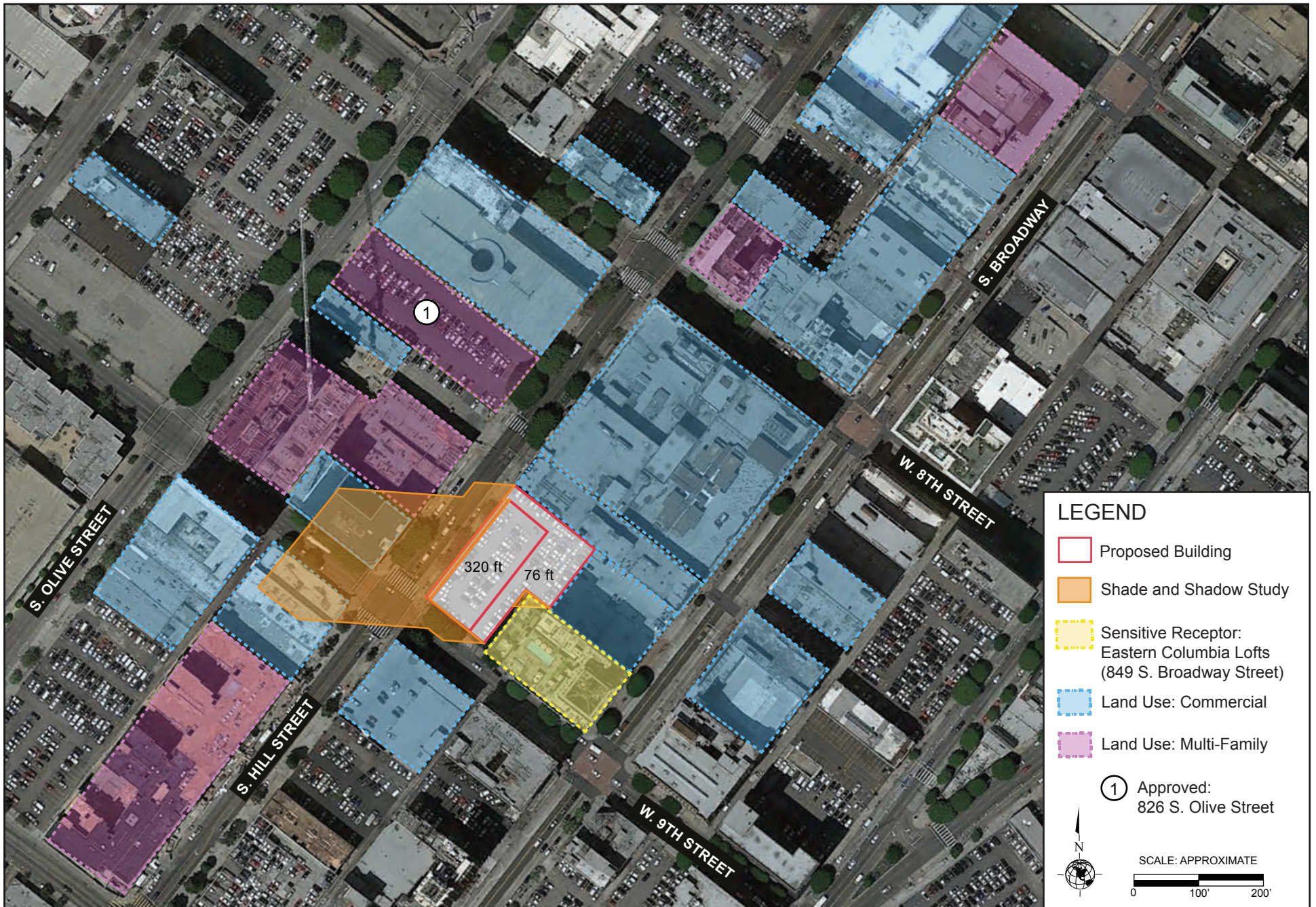
Source: Google Earth, Aerial View, 2015



Figure III-17
 Winter Solstice Shadows
 3:00 P.M.

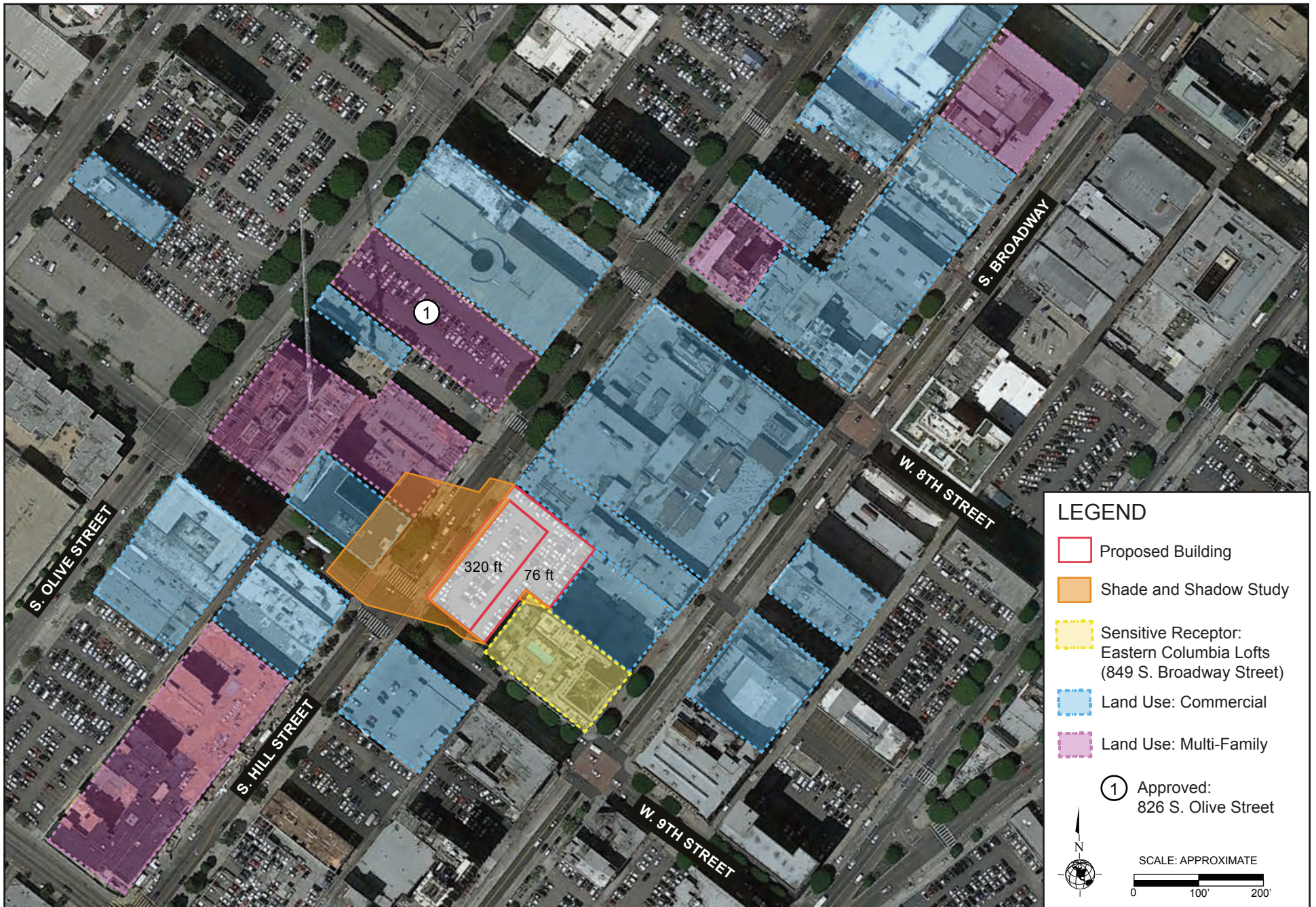


Source: Google Earth, Aerial View, 2015

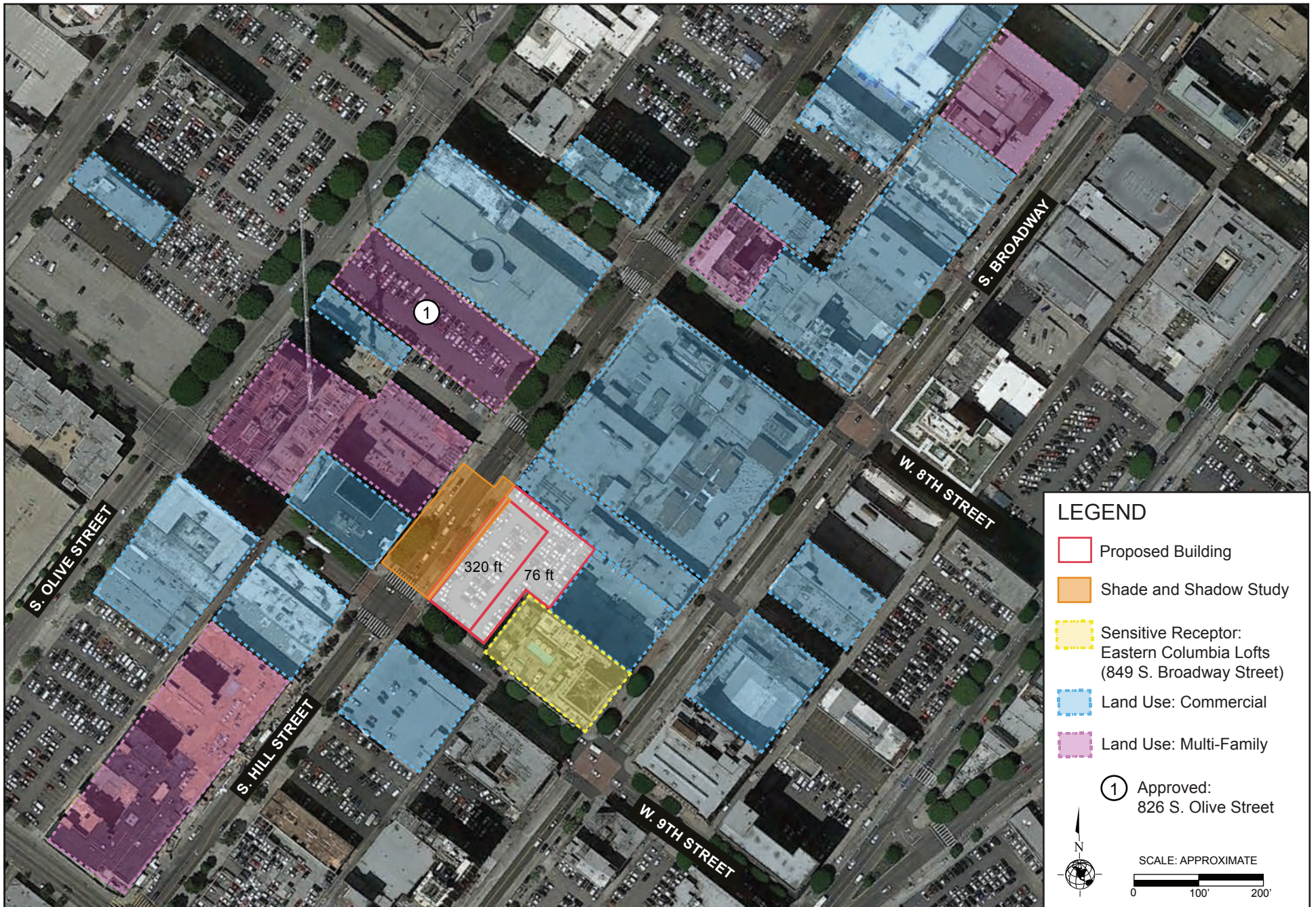


Source: Google Earth, Aerial View, 2015

Figure III-19
 Summer Solstice Shadows
 10:00 A.M.



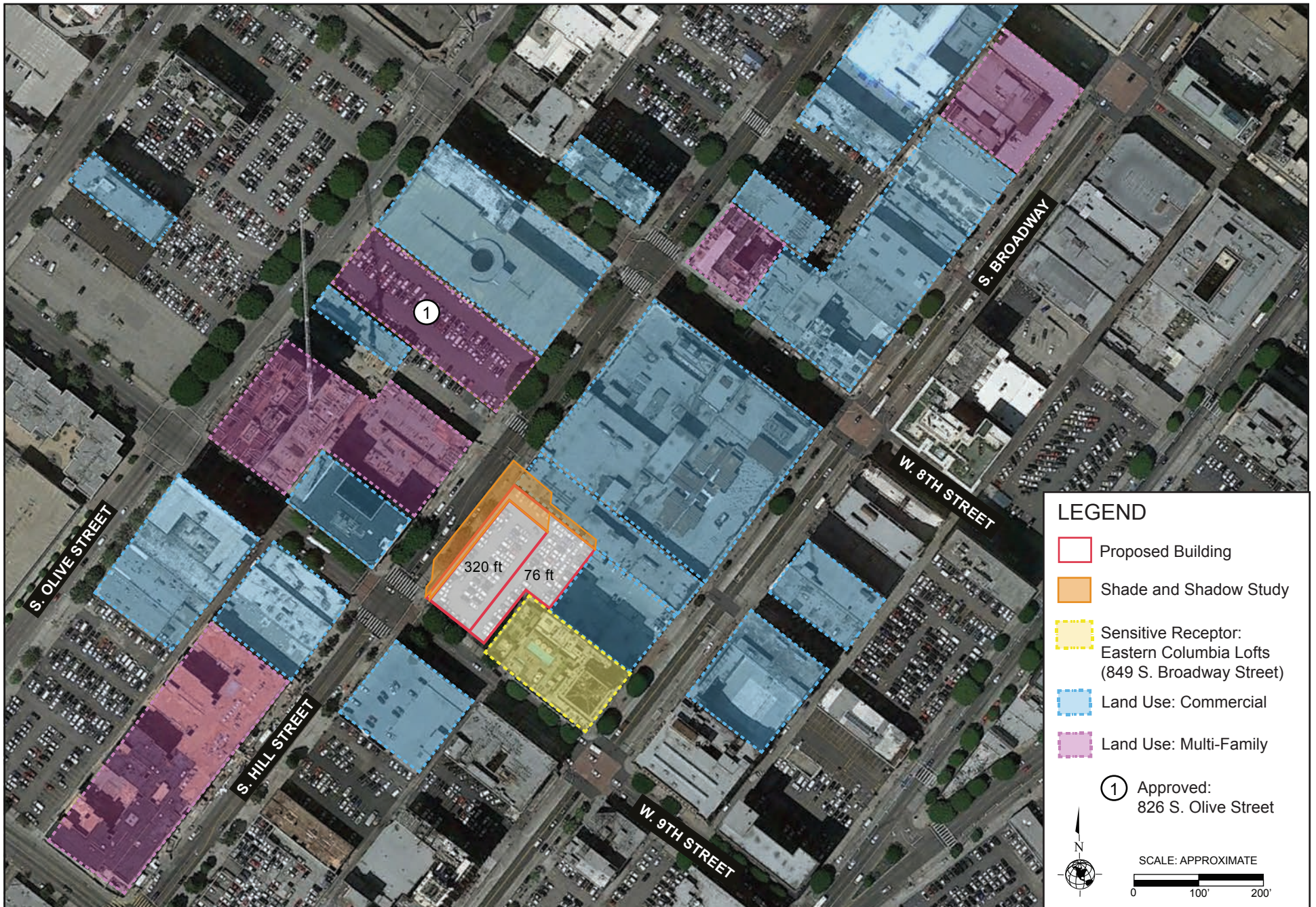
Source: Google Earth, Aerial View, 2015



Source: Google Earth, Aerial View, 2015

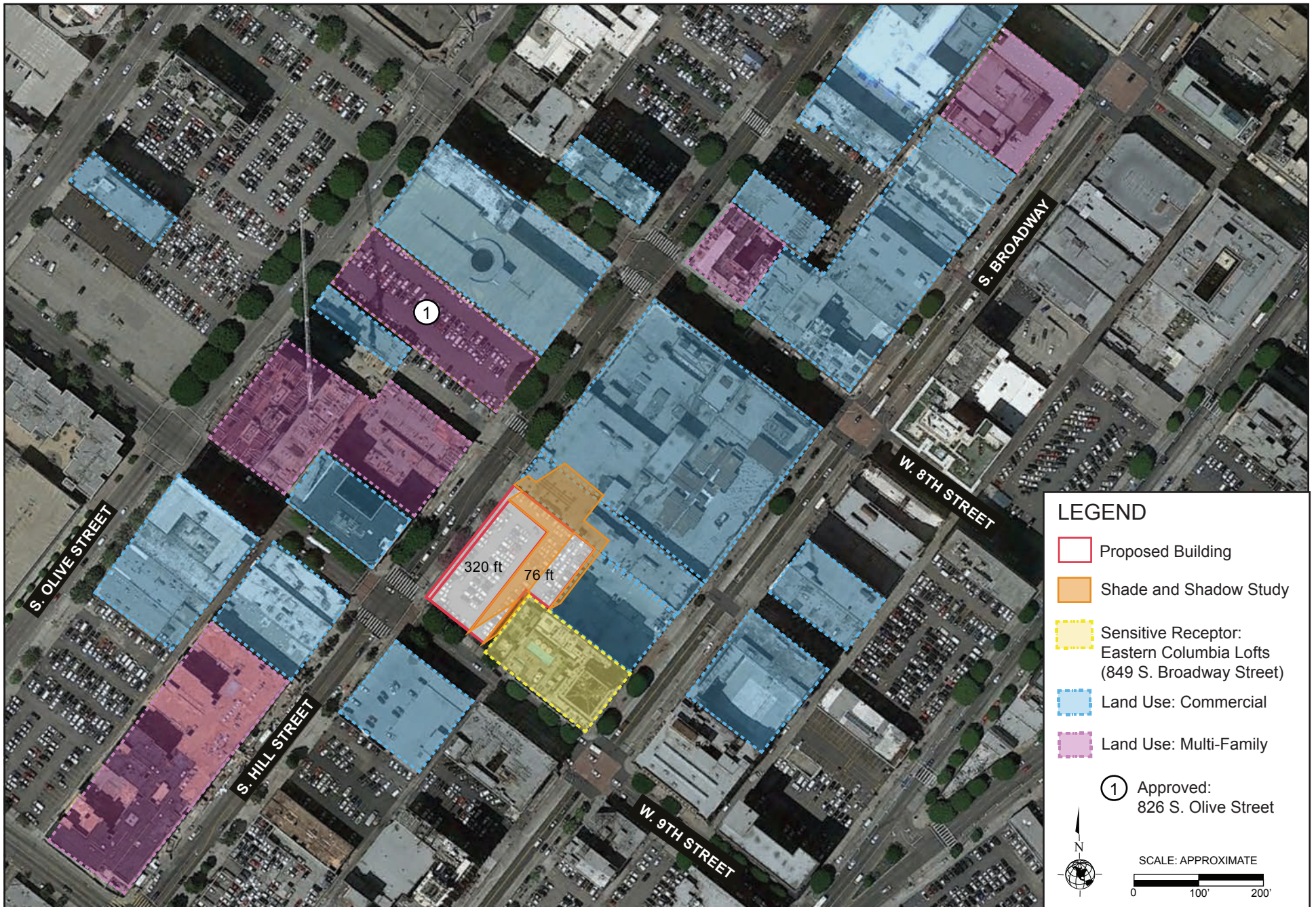


Figure III-21
 Summer Solstice Shadows
 12:00 P.M.

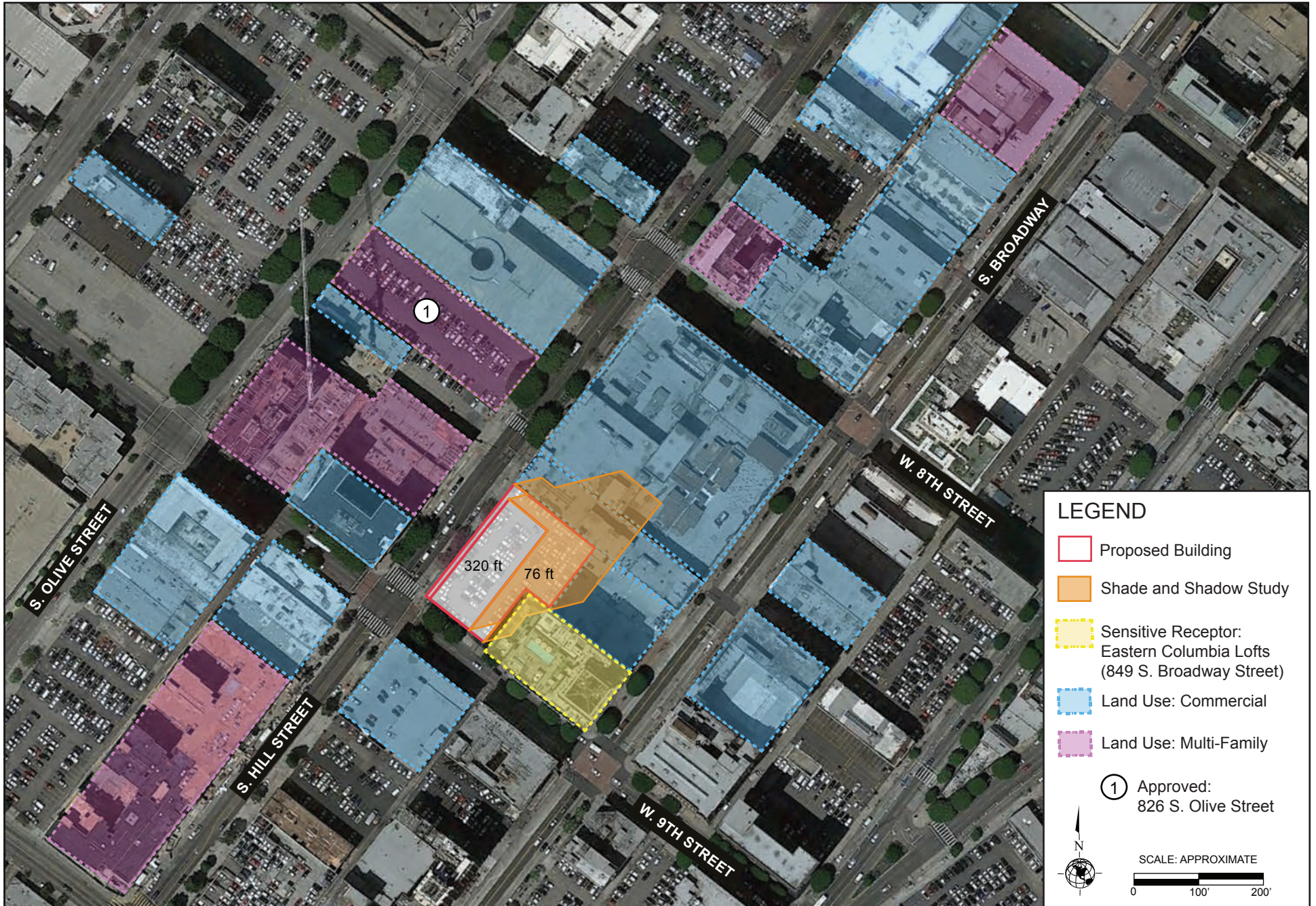


Source: Google Earth, Aerial View, 2015

Figure III-22
Summer Solstice Shadows
1:00 P.M.



Source: Google Earth, Aerial View, 2015



LEGEND

- Proposed Building
- Shade and Shadow Study
- Sensitive Receptor:
Eastern Columbia Lofts
(849 S. Broadway Street)
- Land Use: Commercial
- Land Use: Multi-Family
- 1 Approved:
826 S. Olive Street

N

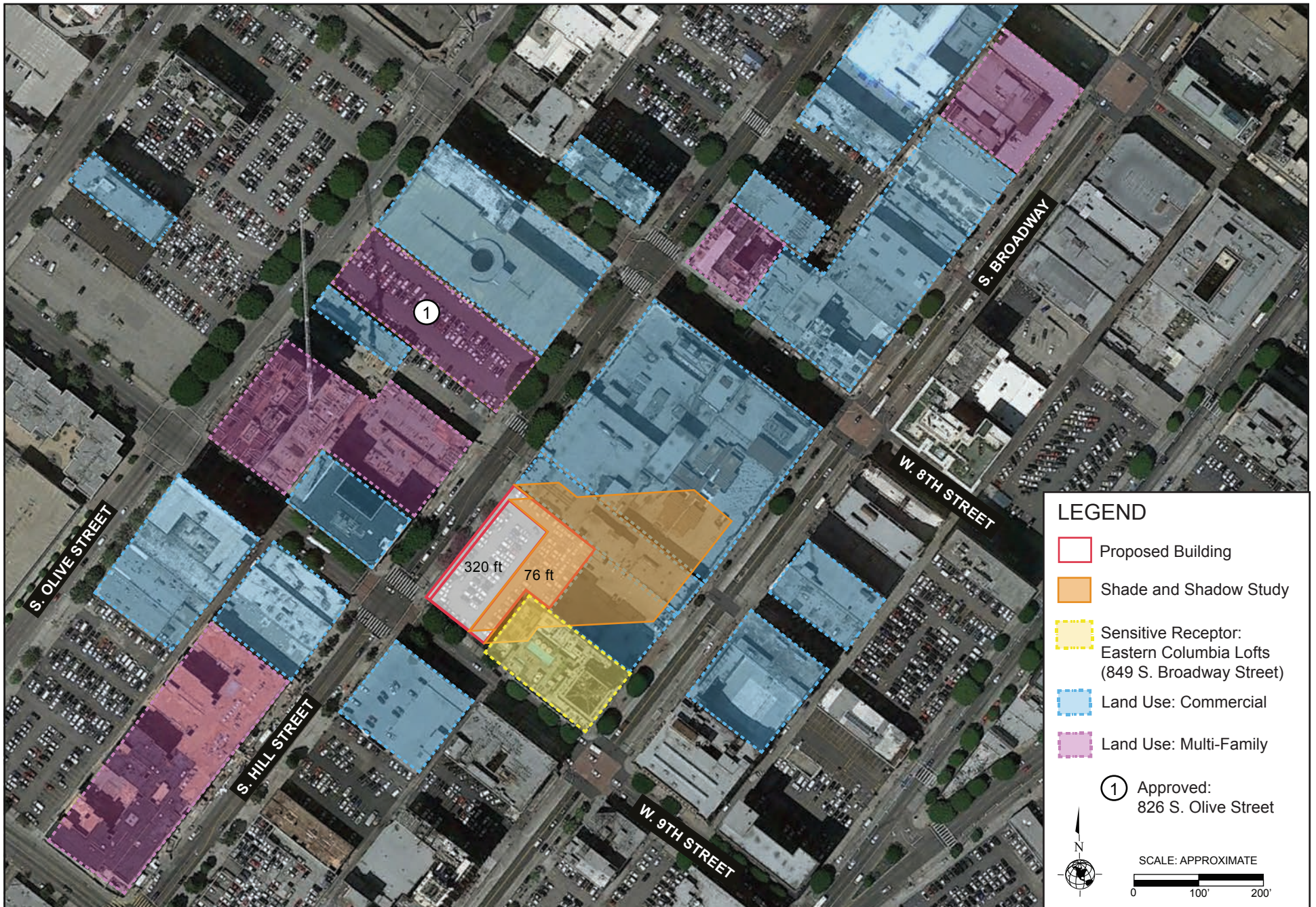
 SCALE: APPROXIMATE

 0 100' 200'

Source: Google Earth, Aerial View, 2015



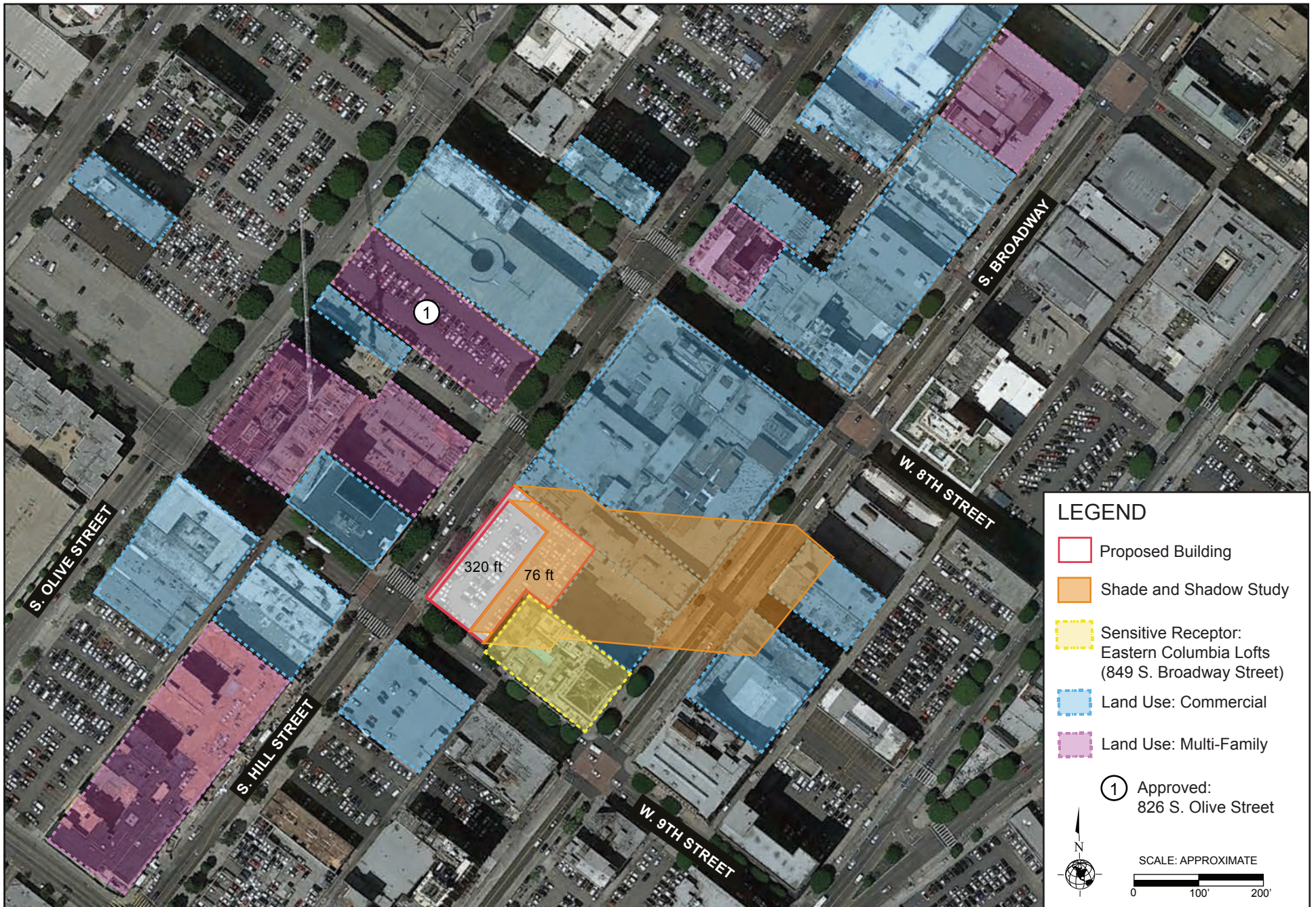
Figure III-24
 Summer Solstice Shadows
 3:00 P.M.



Source: Google Earth, Aerial View, 2015



Figure III-25
 Summer Solstice Shadows
 4:00 P.M.



Source: Google Earth, Aerial View, 2015



Figure III-26
 Summer Solstice Shadows
 5:00 P.M.

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

Where Public Resources Code Section 21099 is not applicable, the City's CEQA thresholds provide that a significant impact may occur if the project introduces new sources of light or glare on or from the project site which would be incompatible with the areas surrounding the project site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the proposed project results in a significant nighttime illumination impact shall be made considering the following factors: (a) the change in ambient illumination levels as a result of proposed project sources; and (b) the extent to which proposed project lighting would spill off the project site and affect adjacent light-sensitive areas.

Original Project

Less Than Significant. With respect to lighting, the Original Project included low to moderate levels of interior and exterior lighting for security, signage, and architectural highlighting and landscaping that is similar to surrounding uses. With respect to glare, the 2007 IS/MND concluded that any potential glare effects associated with building materials would be limited and temporary, changing with the movement of the sun throughout the course of the day and seasons of the year. As vehicular movement would be generally internal to the site (subterranean parking and parking garage), automobile-related glare impacts to any sensitive off-site uses would not occur. Therefore, light and glare impacts would be less than significant.

Modified Project

Less Than Significant.

Light

Lighting for the Modified Project would be provided in order to illuminate the building entrances, common open space areas, and parking areas, largely to provide adequate night visibility for residents and visitors and to provide a measure of security. As noted below in Project Design Feature PDF-AES-1, all outdoor lighting would be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the public right-of-way. A moderate degree of illumination already exists in the Project vicinity in the form of streetlights, building lighting, and car headlights along W. 9th Street and S. Hill Street. The Modified Project would not generate a substantial increase in ambient lighting as the majority of lighting would be directed towards the interior of the Project Site and away from any nearby land uses. Vehicular access to and from the Project Site would be provided from two two-way driveways, one located off of S. Hill Street and one located off of 9th Street. Headlights from vehicles entering and exiting the proposed parking structure would be directed towards the adjacent land uses to the west or to the south, which consists of commercial buildings and parking garages. Thus, headlights from vehicles utilizing the proposed driveways would not result in an adverse impact on the buildings to the west or south of the proposed driveways. With respect to light resulting from vehicle

headlights utilizing the parking podium, at the utility service yard between the Modified Project and Eastern Columbia building a solid wall would be used to obscure views into and light from the parking garage. As shown in Figure II-23, Enlarged Podium and Screening Diagram and Wall Sections, the Modified Project would enclose the eastern portion of the podium directly facing the adjacent Eastern Columbia building and approximately 63.5 feet of the portion of the podium facing the adjacent parking garage. The remaining portion of the proposed podium facing the Eastern Columbia parking garage would include a vertical louver system. Therefore, the Modified Project would not introduce any new sources of substantial light that are incompatible with the surrounding areas and with incorporation of Project Design Feature PDF-AES-1, the Modified Project's impacts would be less than significant.

Glare

Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets, exterior building windows, and surfaces of brightly painted buildings. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. The Modified Project would not introduce any new substantial sources of glare that are incompatible with the surrounding areas. Therefore, with incorporation of Project Design Features PDF-AES-2 and PDF-AES-3, the Modified Project's impacts would be less than significant.

Project Design Features:

PDF-AES-1 Aesthetics (Light)

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

PDF-AES-2 Aesthetics (Glare)

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

PDF-AES-3 Aesthetics (Screening on Parking Garages)

- Exterior screening shall be installed to minimize the spill light from luminaires within open structure buildings from reaching beyond the Project Site. The screening shall also be installed so as to minimize the views and potential glare of headlights of motor vehicles within the garage from beyond the Project Site boundary. Screening measures may include, but are not limited to, shielding attached to the luminaire, building, or site structures.

Cumulative Impacts

Less Than Significant Impact. The application of Public Resources Code Section 21099 provides that the aesthetic impacts of a mixed-use project, such as the Project, upon an infill site within a transit priority area shall not be considered significant impacts on the environment. Development of the Modified Project in conjunction with the 84 related infill projects would result in an intensification of existing prevailing land uses in the transit priority area within the Central City Community within the City of Los Angeles. Development of the related projects is expected to occur in accordance with adopted plans and regulations. With respect to the overall visual quality of the surrounding neighborhood and scenic vistas, each of the related projects would be subject to site plan review by the Los Angeles Department of City Planning for review and approval. Buildings under construction or planned in the project vicinity, such as the 50-story mixed-use project located to the west of the Project Site at 826 S. Olive Street (See Figure II-19, 9th Street Contextual Elevation), would be subject to the site plan review process to ensure each project is designed and constructed in a manner that is consistent with the Downtown Design Guide, the Historic Downtown Los Angeles Design Guidelines, the Los Angeles General Plan, and the Central City Community Plan, as applicable, and compatible with the existing urban form and character of the surrounding environment. With respect to light and glare, the Modified Project would not introduce any new sources of substantial light or glare that are incompatible with the surrounding urban area that is characteristic of Downtown Los Angeles. Therefore, cumulative aesthetic impacts would be less than significant.

With respect to shade and shadow impacts, the Modified Project would not have the potential to significantly impact any shadow sensitive land uses. One property located at 888 S. Olive Street, to the west of the Project Site across S. Hill Street, has recently completed construction and is now leasing apartment units. This development includes a 33-story mixed-use residential tower and a five level parking structure with open space on top of the parking structure. Additionally, one property located at 826 S. Olive Street, to the west across S. Hill Street is currently approved for a 50-story mixed-use residential building and has recently begun site-clearing. As these sites are either, under construction, leasing, or not currently occupied, the public availability of the scale and massing of the existing and proposed developments underway gives awareness to future occupants who would not have an expectation for direct sunlight as a result of existing and pending publically available development plans. Furthermore, as shown in Figures III-27 through III-32, the Modified Project, in combination with surrounding related projects, would not create a cumulative shadow impact with respect to amenities associated with the mixed-use residential Eastern Columbia building. Therefore, the Modified Project would not make a cumulatively considerable contribution to shadow impacts.



Source: Google Earth, Aerial View, 2015

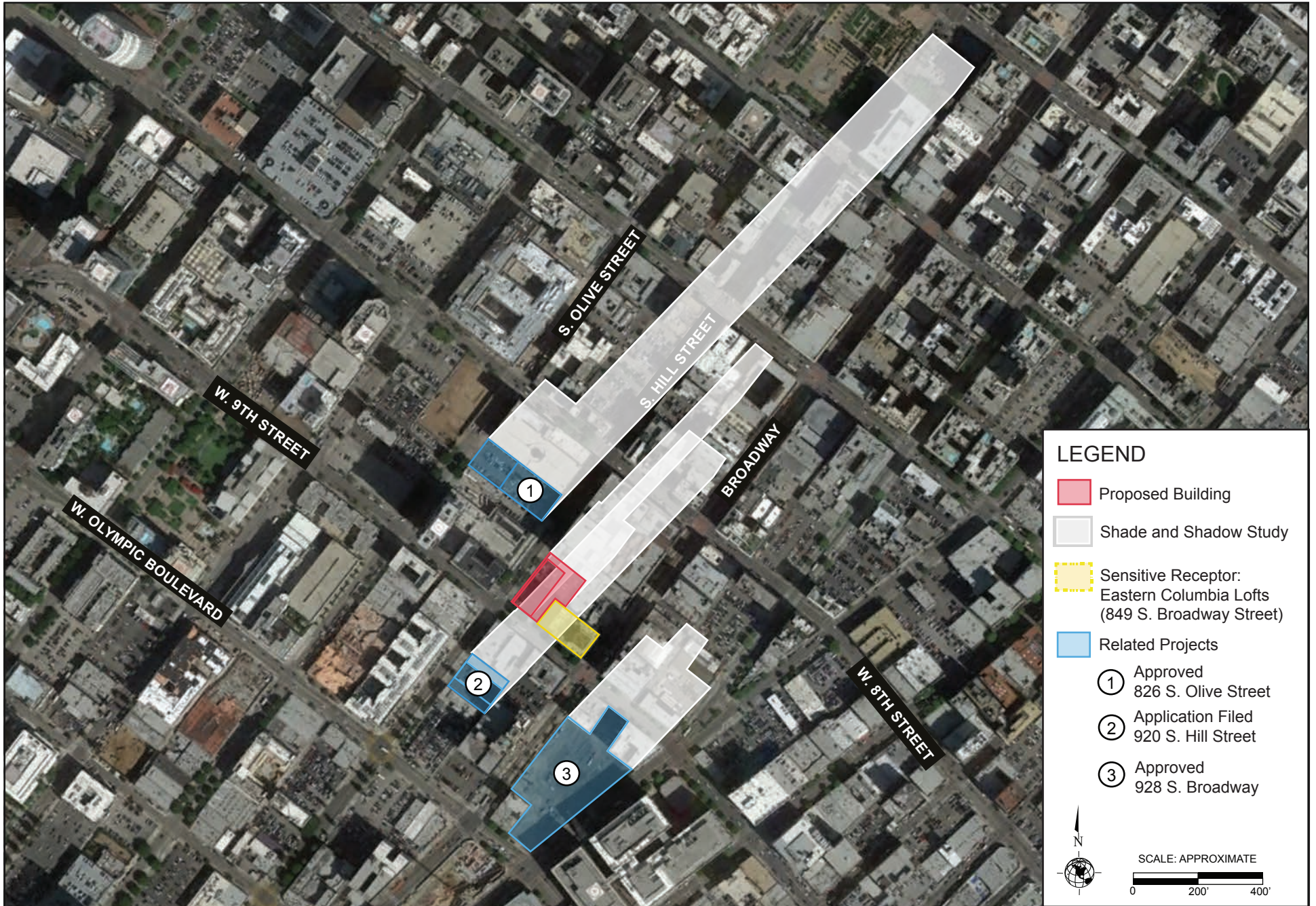
Figure III-27
Cumulative Winter Solstice Shadows
9:00 A.M.



Source: Google Earth, Aerial View, 2015



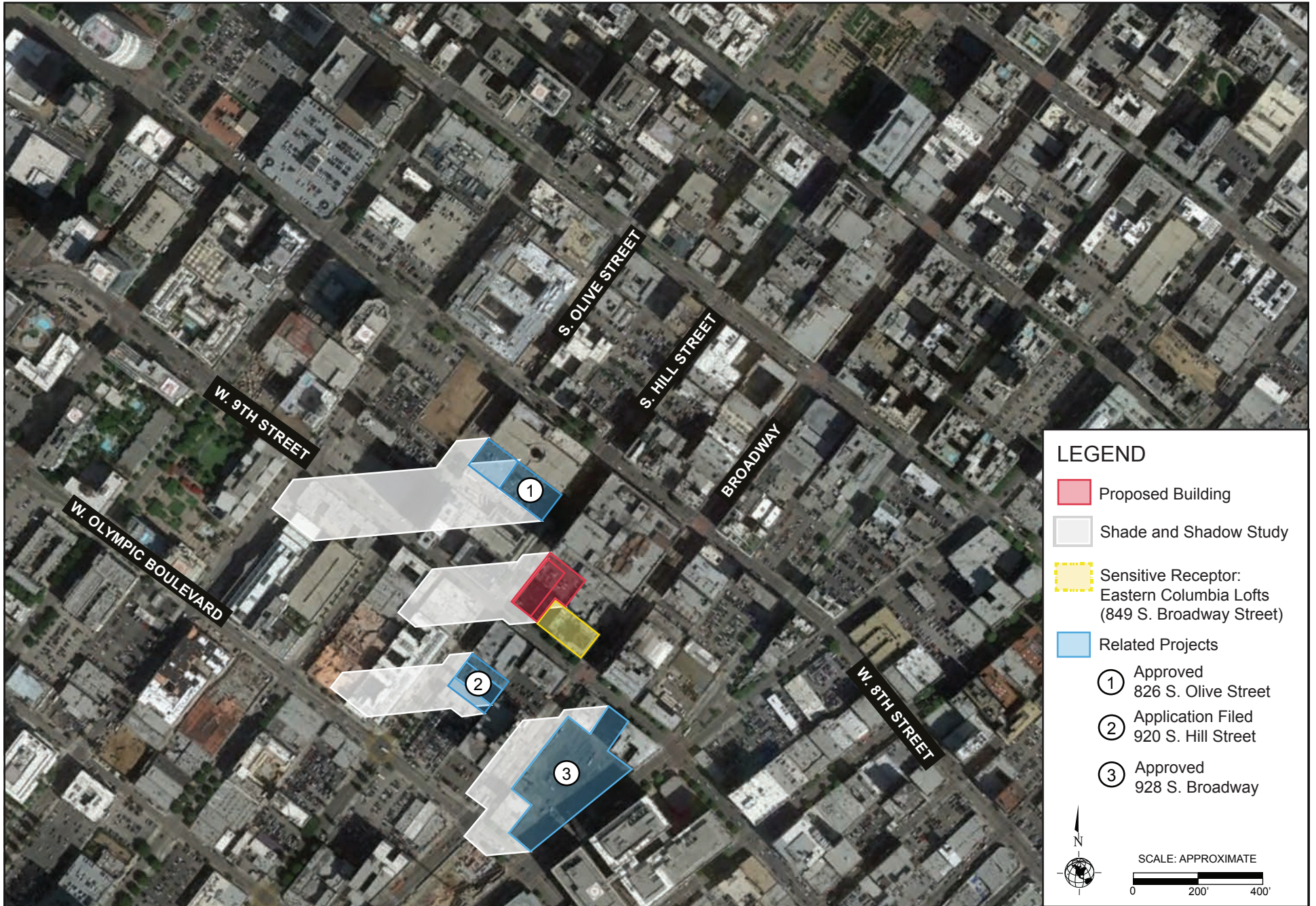
Figure III-28
 Cumulative Winter Solstice Shadows
 12:00 P.M.



Source: Google Earth, Aerial View, 2015

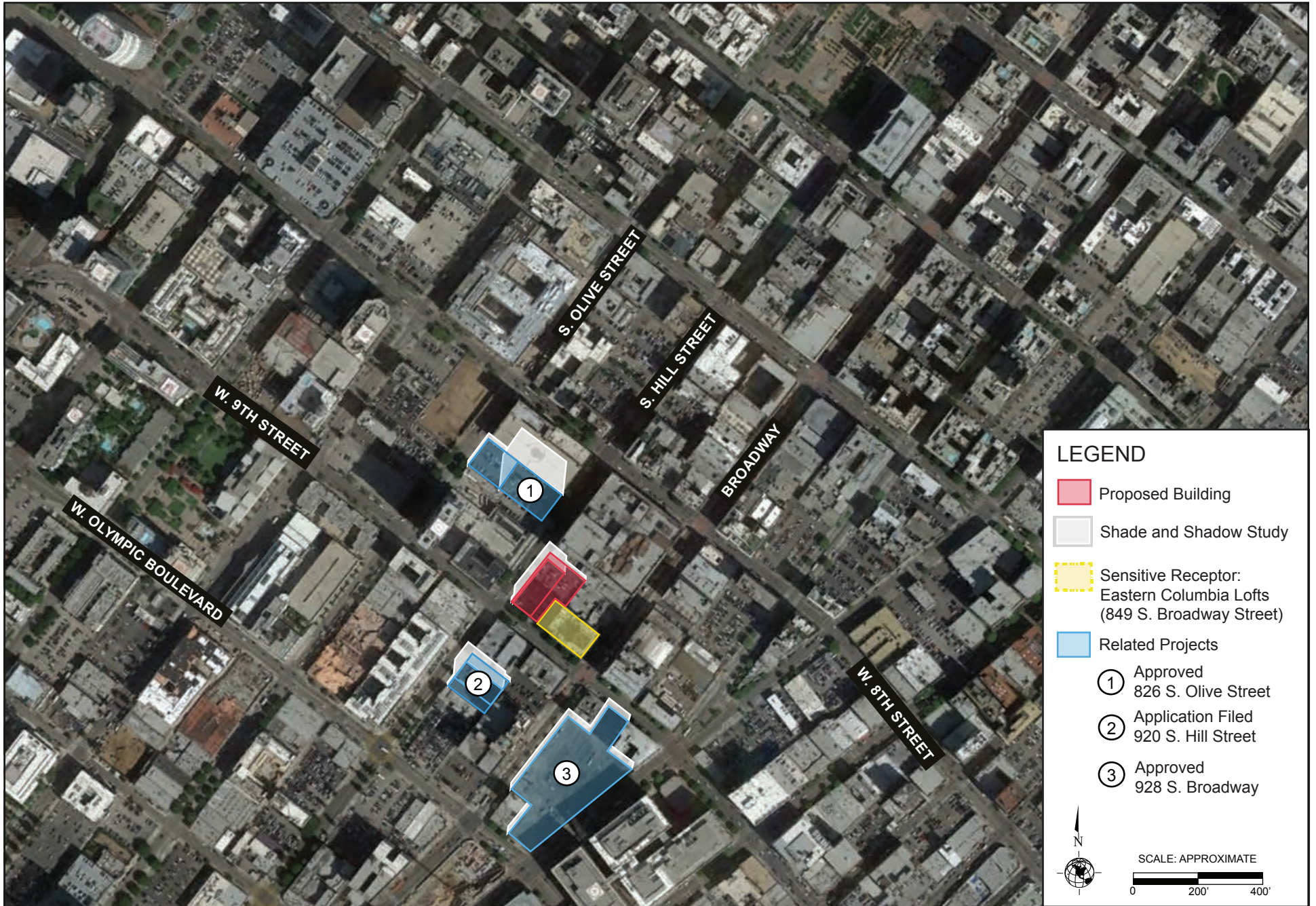


Figure III-29
Cumulative Winter Solstice Shadows
3:00 P.M.



Source: Google Earth, Aerial View, 2015


Figure III-30
 Cumulative Summer Solstice Shadows
 9:00 A.M.

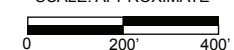


LEGEND

- Proposed Building
- Shade and Shadow Study
- Sensitive Receptor:
Eastern Columbia Lofts
(849 S. Broadway Street)
- Related Projects

- ① Approved
826 S. Olive Street
- ② Application Filed
920 S. Hill Street
- ③ Approved
928 S. Broadway



 SCALE: APPROXIMATE


Source: Google Earth, Aerial View, 2015



Figure III-31
 Cumulative Summer Solstice Shadows
 1:00 P.M.



Source: Google Earth, Aerial View, 2015



Figure III-32
 Cumulative Summer Solstice Shadows
 5:00 P.M.

II. AGRICULTURE AND FORESTRY RESOURCES

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

Original Project

No Impact. Due to its urban setting, the Project Site is not included in the Farmland Mapping and Monitoring Program of the California Resources Agency. The Original Project would not result in any impacts to Prime Farmland, Unique Farmland or Farmland of Statewide Importance.

Modified Project

No Impact. The Project Site is located in a highly developed area of Downtown Los Angeles. No farmland or agricultural activity exists on the Project Site, nor are there any farmland or agricultural activities in the vicinity of the Project Site. According to the “Los Angeles County Important Farmland 2010” map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not candidate for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.³ Therefore, similar to the Original Project, the Modified Project would not result in an impact to agricultural lands.

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

Original Project

No Impact. The Project Site is not zoned for agricultural purposes. No agricultural zoning is present in the surrounding area. No impact with respect to agricultural zoning or the Williamson Act would occur.

Modified Project

No Impact. The Project Site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the Los Angeles Municipal Code (LAMC). The Project Site is currently zoned C5-4D with the land use designation of Regional Center Commercial and is not zoned for agricultural production, and no farmland activities exist on-site. In addition, no Williamson Act Contracts are in effect for the Project Site.⁴ Therefore, the Modified Project would have no impact associated with land zoned for agricultural use.

³ State of California Department of Conservation, Division of Land Resource Protection, *Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2010, Map*. <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf>, accessed March 2015.

⁴ *Williamson Act Program, California Division of Land Resource Protection, website* ftp://ftp.consrv.ca.gov/pub/dlrp/wa/2012%20Statewide%20Map/WA_2012.pdf, accessed March 2015.

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

Original Project

No Impact. Since no agricultural uses or related operations occur on or near the Project Site, the Original Project would not directly or indirectly cause the conversion of farmland to non-agricultural uses and therefore no impact would occur.

Modified Project

No Impact. The Project Site is zoned C5-4D, which has a land use designation of Regional Center Commercial in the Central City Community Plan. The Project Site is not zoned as forestland or timberland, and there is no timberland production at the Site. Therefore, similar to the Original Project, the Modified Project would have no impact associated with the conversion of farmland.

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

Original Project

Checklist question II. (d) was not previously analyzed in the 2007 IS/MND. However, as analyzed under the Modified Project, there is no vegetation on-site. No forested lands or protected vegetation exist on or in the vicinity of the Project Site. Therefore, no impact would occur.

Modified Project

No Impact. The Project Site is fully developed and currently contains a paved surface parking lot. The Project Site is located in a highly developed area of Downtown Los Angeles. There is no vegetation on-site. No forested lands or protected vegetation exist on or in the vicinity of the Project Site. Therefore, no impact would occur.

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

Original Project

Checklist question II. (e) was not previously analyzed in the 2007 IS/MND. However, as analyzed under the Modified Project, neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses. Therefore, no impact would occur.

Modified Project

No Impact. Neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses. As discussed above, the Project Site is not classified in any “Farmland” category designated by the State of California. According to the “Los Angeles County Important Farmland 2010” map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.⁵ Therefore, no impact would occur.

Cumulative Impacts

No Impact. Development of the Modified Project in combination with the 84 related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of any forest land or conversion of forest land to non-forest use. The Los Angeles County Important Farmland 2010 Map maintained by the California Division of Land Resource Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category.⁶ The Project Site is located in an urbanized area in the Central City Community within the City of Los Angeles and does not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact would occur.

III. AIR QUALITY**a) Would the project conflict with or obstruct implementation of the applicable air quality plan?**

A significant air quality impact could occur if the proposed project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan.

Original Project

Less Than Significant Impact. The 2007 IS/MND concluded the Original Project would result in a less than significant air quality impacts with respect to the Original Project’s potential to conflict with or obstruct implementation of the applicable air quality plan. The analysis in the 2007 IS/MND was based on consistency with the 2003 AQMP and the regional population and employment growth assumptions of the 2001 Regional Transportation Plan. The AQMP consistency analysis also included dispersion

⁵ *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2010, Map.* [ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf](http://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf), accessed March 2015.

⁶ *Ibid.*

modeling for Carbon Monoxide (CO) hotspot impacts and found the Original Project's localized one-hour and eight-hour CO concentrations under "project" conditions would be less than significant.⁷

The 2007 IS/MND concluded the Original Project would add 167 new housing units, which represented less than one percent of the 62,911 new housing units that were projected in SCAG's RTP between 2005 and 2010 for the Los Angeles City subregion. Similarly, the 2007 IS/MND concluded the Original Project would result in a population increase of approximately 501 persons, which represented less than one percent of the 143,605 new population growth projected in SCAG's RTP between 2005 and 2010 for the Los Angeles City subregion. The Original Project's housing and population growth was therefore found to be consistent with housing forecasts for the subregion as adopted by SCAG. In addition, the retail component of the Original Project was found to generate fewer than ten new employees and would thus be consistent with the AQMP employment assumptions. The Original Project was therefore concluded to be consistent with the AQMP.

Modified Project

Less Than Significant Impact. The AQMP was last updated and adopted by the Governing Board of the South Coast Air Quality Management District (SCAQMD) on December 7, 2012 ("Final 2012 AQMP"). The transportation strategy and transportation control measures (TCMs), included as part of the 2012 AQMP and SIP for the South Coast Air Basin, are based on SCAG's adopted 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and 2011 Federal Transportation Improvement Program (FTIP). For purposes of assessing a project's consistency with the AQMP, projects that are consistent with the growth forecast projections of employment and population forecasts identified in the 2012-2035 RTP/SCS are considered consistent with the AQMP, since the growth projections contained in the 2012-2035 RTP/SCS form the basis of the land use and transportation control portions of the AQMP.

The Modified Project is consistent with the regional growth projections for the Los Angeles Subregion and the smart growth policies of the 2012-2035 RTP/SCS which aim to increase housing density within High-Quality Transit Areas (HQTA) as defined by SB743 and Transit Priority Areas as defined by Public Resources Code (P.R.C.) Sections 21099 and 21064.3. An HQTA is defined by SB743 as a generally walkable transit village or corridor within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. CEQA defines a "Transit Priority Area" as an area within one-half mile of a major transit stop that is existing or planned. The Project Site is located within one-half of a mile from two Metro Stations (i.e., the 7th Street Metro Station and Pershing Square Metro Station) and is also served by several Metro bus lines with 15-minute or less service headways. Thus, the Project's location would provide opportunities for employees, guests, visitors, and residents to use public transit to reduce vehicle trips. Studies by the California Department of Transportation, the U.S. Environmental Protection Agency and the Metropolitan Transportation

⁷ *As the Basin is now in attainment for CO emissions localized CO hotspot emissions modeling is no longer necessary to conclude project emissions would not conflict with the AQMP attainment goals for CO.*

Commission have found that focusing development in areas served by transit can result in local, regional and statewide benefits including reduced air pollution and energy consumption. As discussed in the Project's Traffic Study (See Appendix F to this Addendum), the Modified Project's mixed-use nature and close proximity to neighborhood-serving commercial/retail land uses and regional transit would result in fewer trips and a reduction to the Modified Project's vehicle miles traveled (VMTs) as compared to the base trip rates for similar stand-alone land uses that are not located in close proximity to transit. Thus, because the Modified Project is consistent with the growth projections and regional land use planning policies of the 2012-2035 RTP/SCS, it would not conflict with or obstruct implementation of the 2012 AQMP and project impacts would be less than significant.

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

Based on the *L.A. CEQA Thresholds Guide*, a project may have a significant impact where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation.

Original Project

Potentially Significant Impact Unless Mitigation Incorporated. The Construction air quality analysis presented in the 2007 IS/MND was based on the 850 S. Hill Street Project Air Quality & Noise Technical Impact Report prepared by Terry A. Hayes Associates, LLC, dated June 2006. The Report was based on a proposed development of 267 residential condominiums and 5,520 square feet of retail uses.

Construction Impacts

The 2007 IS/MND concluded the Original Project would result in potentially significant air quality impacts unless mitigation was incorporated for construction and operational emissions. The Air Quality Analysis in the 2007 IS/MND was based on URBEMIS2002, which was the AQMD's industry-accepted software model for estimating the majority of daily construction emissions. Architectural coating emissions were estimated separately using formulas contained in the SCAQMD CEQA Air Quality Handbook. At the time the 2007 IS/MND was prepared, the Los Angeles County portion of the Air Basin was designated as a non-attainment area for Ozone (O_3) and particulate matter (PM_{10} and $PM_{2.5}$). The Air Basin was designated as in attainment for Carbon Monoxide (CO), Nitrogen Dioxide (NO_2), Sulfur Dioxide (SO_2), sulfates and lead (Pb). The air quality analysis presented in the 2007 IS/MND was based on one phase of construction estimated to be 32-months including excavation, site preparation, foundation, building erection, exterior treatments and finishing. Excavation was estimated to be completed in one to two months and assumed approximately 45,500 cubic yards of export.

Construction of the Original Project was estimated to result in maximum daily emissions of approximately 125 pounds per day (ppd) of carbon monoxide (CO), 15 ppd of volatile organic

compounds (VOC), 59 ppd of nitrogen oxides (NO_x), less than one ppd of sulfur oxides (SO_x) and 18 ppd of particulate matter 10 microns or less in diameter (PM₁₀).⁸ Daily construction emissions were anticipated to be less than the SCAQMD's regional significance thresholds and, as such, would result in a less-than-significant impact. As concluded in the 2007 IS/MND, estimated daily construction emissions were concluded to be less than significant with implementation of Mitigation Measures 2 through 9, below.

Mitigation Measures:

2. Water or a stabilizing agent shall be applied to exposed surfaces in sufficient quantity to prevent generation of dust plumes.
3. Track-out shall not extend 25 feet or more from an active operation, and track-out shall be removed at the conclusion of each workday.
4. A wheel washing system shall be installed and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site.
5. All haul trucks hauling soil, sand, and other loose materials shall maintain at least six inches of freeboard in accordance with California Vehicle Code Section 23114.
6. All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).
7. Traffic speeds on unpaved roads shall be limited to 15 miles per hour.
8. Operations on unpaved surfaces shall be suspended when winds exceed 25 miles per hour.
9. Heavy-equipment operations shall be suspended during first and second stage smog alerts.

Toxic Air Contaminant Impacts

The 2007 IS/MND concluded the greatest potential for TAC emissions during construction would be diesel particulate emissions associated with heavy equipment operations. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk-assessment methodology. Given the relatively short-term construction schedule of 32 months, the 2007 IS/MND concluded the Original Project would not result in a long-term (i.e., 70 years) substantial source

⁸ *It should be noted that the 2007 IS/MND did not address particulate matter less than 2.5 microns in diameter (i.e., PM_{2.5}), as the AQMD did not adopt thresholds of significance for PM_{2.5} until after the IS/MND was published.*

of TAC emissions with no residual emissions after construction and corresponding individual cancer risk. As such, project-related TAC emission impacts during construction were concluded to be less than significant.

Operational Impacts

Long-term operational project emissions associated with natural gas combustion, consumer products (e.g., aerosol sprays) and mobile sources were also estimated using the URBEMIS2002 software model. Motor vehicles generated by the Original Project were found to be the predominate source of long-term project emissions. According to the traffic report for the Original Project, the Approved Project was anticipated to generate 1,140 net daily vehicle trips. The 2007 IS/MND concluded that the Original Project's operational area and mobile source emissions would not exceed SCAQMD significance thresholds for regional operational emissions.

Modified Project

Potentially Significant Impact Unless Mitigation Incorporated.

Construction Emissions

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 24 months with buildout anticipated in 2018. This assumption is conservative and yields the maximum daily impacts. Construction activities associated with the Modified Project would be undertaken in five main steps: (1) site clearing, (2) excavation, grading and foundations and (3) building construction, (4) architectural coatings, and (5) paving. The earthwork/grading phase would occur over 2.5 months and would require excavating the site to a depth of approximately 20 feet for the construction of the building's footings and one subterranean parking level. The site clearing and excavation phase would require the export of approximately 500 cubic yards (cy) of asphalt debris and approximately 30,752 cy of soil respectively. The building construction phase includes the construction of the proposed buildings, connection of utilities to the buildings, laying irrigation for landscaping, architectural coatings, paving, and landscaping the Project Site. Construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving site excavation, grading and foundation preparation would primarily generate PM_{2.5} and PM₁₀ emissions. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the Project Site) would primarily generate NO_x emissions. The application of architectural coatings would primarily result in the release of ROG emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time. Each construction phase is described in more detail below.

The Modified Project's construction emissions were quantified utilizing the California Emissions Estimator Model (CalEEMod) as recommended by the SCAQMD. Table III-2, Estimated Peak Daily Construction Emissions, identifies the maximum daily emissions that are estimated to occur on peak construction days for each phase of project construction. These calculations assume that appropriate dust

control measures would be implemented as part of the Modified Project during each phase of development, as required and regulated by SCAQMD. For purposes of this analysis, the following regulatory compliance measures have been identified as being applicable to the Modified Project's construction activities:

Regulatory Compliance Measures:

RC-AQ-1 (Demolition, Grading and Construction Activities)

- Compliance with provisions of the SCAQMD District Rule 403. The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:
 - a) All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
 - b) The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
 - c) All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
 - d) All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
 - e) All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
 - f) General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
 - g) Trucks having no current hauling activity shall not idle but be turned off.

RC-AQ-2: In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.

RC-AQ-3: In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

RC-AQ-4: The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.

As shown in Table III-2, below, construction-related daily emissions associated with the Modified Project would not exceed any regional SCAQMD significance thresholds for criteria pollutants during the

construction phases. Therefore, construction impacts are considered to be less than significant. Furthermore, with respect to construction impacts, the Modified Project would implement Mitigation Measures 2 through 9 of the Original Project.

**Table III-2
Estimated Peak Daily Construction Emissions**

Emission Source	ROG	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
Site Preparation						
On-Site Fugitive Dust	0.00	0.00	0.00	0.00	0.59	<1
On-Site Off-Road (Diesel Equipment)	1.36	13.64	7.34	<1	0.83	0.77
Off Site (Hauling, Vendor, Worker)	0.14	1.82	1.70	<1	0.19	0.07
Total Emissions	1.50	15.46	9.04	<1	1.61	0.84
SCAQMD Thresholds	100	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Grading						
On-Site Fugitive Dust	0.00	0.00	0.00	0.00	0.76	0.42
On-Site Off-Road (Diesel Equipment)	1.31	11.24	8.70	0.01	0.80	0.76
Off Site (Hauling, Vendor, Worker)	0.34	4.74	4.26	<1	0.47	0.18
Total Emissions	1.65	15.98	12.96	0.01	1.93	0.36
SCAQMD Thresholds	100	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Building Construction Phase						
On-Site Off-Road Diesel Equipment	1.38	13.70	8.21	0.01	0.93	0.86
Off Site (Hauling, Vendor, Worker)	1.71	6.56	23.47	0.05	3.59	1.03
Total Emissions	3.09	20.26	31.68	0.06	4.42	1.89
SCAQMD Thresholds	100	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Architectural Finishing						
On-Site Architectural Coating	95.61	0.00	0.00	0.00	0.00	0.00
On-Site Off-Road Diesel Equipment	0.33	2.19	1.87	<1	0.17	0.17
Off-Site Hauling/Vendor/Worker Trips	0.21	0.29	3.02	<1	0.63	0.17
Total Emissions	96.15	2.48	4.89	<1	0.80	0.34
SCAQMD Thresholds	100	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Paving Phase						
On-Site Off-Road Diesel Equipment	1.04	9.83	7.24	0.01	0.60	0.56
Off-Site Hauling/Vendor/Worker Trips	0.06	0.09	0.97	<1	0.20	0.06
Total Emissions	1.10	9.92	8.21	0.01	0.80	0.62
SCAQMD Thresholds	100	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
<i>Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust. Calculation sheets are provided in Appendix A to this Addendum</i>						

Mitigation Measures:

- 2 Water or a stabilizing agent shall be applied to exposed surfaces in sufficient quantity to prevent generation of dust plumes.

- 3 Track-out shall not extend 25 feet or more from an active operation, and track-out shall be removed at the conclusion of each workday.
- 4 A wheel washing system shall be installed and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site.
- 5 All haul trucks hauling soil, sand, and other loose materials shall maintain at least six inches of freeboard in accordance with California Vehicle Code Section 23114.
- 6 All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).
- 7 Traffic speeds on unpaved roads shall be limited to 15 miles per hour.
- 8 Operations on unpaved surfaces shall be suspended when winds exceed 25 miles per hour.
- 9 Heavy-equipment operations shall be suspended during first and second stage smog alerts.

Operational Emissions

Similar to the conditions that existed for the Original Project, the existing Project Site currently consists of a surface parking lot that accommodates existing parking demand in the vicinity. Therefore, this analysis assumes there are no existing air quality emissions from the Project Site as the vehicle parking at the Project Site are originating from other land uses in the area. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities of a mixed-use high-rise development with multi-family residential and retail land uses. Area source emissions would be generated by the consumption of natural gas and landscape maintenance. As shown in Table III-3, Estimated Daily Operational Emissions, below, the operational emissions of the Modified Project would be below the SCAQMD's significance thresholds for all six criteria pollutants. Therefore, the Modified Project's operational emissions would be less than significant.

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

Based on the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project adds a considerable cumulative contribution to federal or State non-attainment pollutants.

**Table III-3
Estimated Daily Operational Emissions**

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summertime (Smog Season) Emissions						
Mobile (Vehicle) Sources	9.08	24.58	100.11	0.27	18.43	5.16
Energy (Natural Gas)	0.09	0.75	0.41	<1	0.06	0.06
Area	11.26	0.30	25.38	<1	0.14	0.14
Total Project Emissions	20.43	25.63	125.90	0.27	18.63	5.36
SCAQMD Thresholds	55	55	550	150	150	55
Potentially Significant Impact?	No	No	No	No	No	No
Wintertime (Non-Smog Season) Emissions						
Mobile (Vehicle) Sources	9.37	25.81	99.28	0.26	18.43	5.17
Energy (Natural Gas)	0.09	0.75	0.41	<1	0.06	0.06
Area	11.26	0.29	25.38	<1	0.14	0.14
Total Project Emissions	20.72	26.85	125.07	0.26	18.63	5.37
SCAQMD Thresholds	55	55	550	150	150	55
Potentially Significant Impact?	No	No	No	No	No	No
<i>Note: Calculation worksheets are provided in Appendix A to this Addendum.</i>						

Original Project

Less Than Significant Impact. The cumulative air quality analysis in the 2007 IS/MND was based on a methodology that compared the Project's total vehicle miles traveled (VMT) to the regional vehicle miles traveled. As determined in the 2007 IS/MND, the proposed project would have a significant cumulative air quality impact if the ratio of daily project-related population VMT exceeds the ratio of daily project related population to countywide population. As concluded in the 2007 IS/MND, the daily project to countywide VMT ratio was less than the project to countywide population ratio. A localized CO impact analysis was also completed for cumulative traffic (i.e., related projects and ambient growth through 2008). As concluded in the 2007 IS/MND, the project would not violate CO standards at local intersections. As such, the Original Project would not contribute to cumulative air quality impacts.

Modified Project

Less Than Significant Impact. The South Coast Air Basin (Basin) is currently in State non-attainment for ozone, NO₂, PM₁₀ and PM_{2.5}. In regards to determining the significance of the Project contribution, the SCAQMD no longer recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Furthermore, the SCAQMD states that if an individual development project generates less than significant construction or operational emissions,

then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. As discussed under Question III(b) above, the Project would not generate construction or operational emissions that exceed the SCAQMD's recommended regional thresholds of significance. Therefore, the Modified Project would not generate a cumulatively considerable increase in emissions of the pollutants for which the Basin is in nonattainment, and impacts would be less than significant.

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

Based on the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors.

Original Project

Less Than Significant Impact. The 2007 IS/MND stated that a significant impact would occur if the project exposed sensitive receptors to substantial pollutant concentrations. The greatest potential for toxic air contaminant (TAC) emissions during construction would be diesel particulate emissions associated with heavy equipment operations. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk-assessment methodology. Based on the relatively short-term construction schedule of 32 months for the Original Project, the 2007 IS/MND concluded that the Original Project would not result in a long-term (i.e., 70 years) substantial source of TAC emissions with no residual emissions after construction and corresponding individual cancer risk. As such, project-related TAC emission impacts during construction were concluded to be less than significant.

The 2007 IS/MND found that the primary source of potential TACs associated with the Original Project operations would be from diesel particulates from delivery trucks (e.g., truck traffic on local streets and on-site truck idling). The SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulates (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions. The Original Project would develop residential uses and 4,880 square feet of retail uses on the Project Site. The relatively small retail space would not generate a substantial number of daily truck trips. Potential localized TAC impacts from on-site sources of diesel particulate emissions would be minimal since only a limited number of heavy-duty trucks (e.g., delivery trucks) would access the project site, and the trucks that do visit the site would not idle on the project site for extended periods of time. Based on the limited activity of the TAC sources, the 2007 IS/MND found that the Original Project would not warrant the need for a health risk assessment associated with on-site activities, and, in this regard, potential air toxic impacts would be less than significant.

The 2007 IS/MND also found that the Original Project would not include any point source emissions (i.e., such as industrial manufacturing or automotive repair facilities), although minimal emissions may result from the use of consumer products (e.g., hair spray). As such, the Original Project would not have the

potential to release substantial amounts of TACs, and in this regard, no significant impact on human health would occur.

In addition, a CO hotspot analysis indicated that 2008 “Project” one-hour CO concentrations at three study intersections with high traffic volumes would range from approximately 6.7 ppm to 7.4 ppm at worst-case sidewalk receptors. “Project” eight-hour CO concentrations would range from approximately 4.9 ppm to 5.3 ppm. The State one- and eight-hour standards of 20 ppm and 9.0 ppm, respectively, would not be exceeded at the three study intersections.

Modified Project

Less Than Significant Impact. Since the time the 2007 IS/MND was prepared, the SCAQMD adopted Localized Significance Thresholds for analyzing localized impacts to sensitive receptors. Sensitive receptors include populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, child care centers, and athletic facilities.⁹

The SCAQMD has developed localized significance thresholds (LSTs) that are based on the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the “Final Localized Significance Threshold Methodology” document prepared by the SCAQMD,¹⁰ apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM₁₀, and PM_{2.5}. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each SRA. For PM₁₀, the LSTs were derived based on requirements in SCAQMD Rule 403 — Fugitive Dust. For PM_{2.5}, the LSTs were derived based on a general ratio of PM_{2.5} to PM₁₀ for both fugitive dust and combustion emissions.

LSTs are provided for each of SCAQMD’s 38 source receptor areas (SRA) at various distances from the source of emissions. The Project Site is located within SRA 1, which covers the Central Los Angeles area. The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Modified Project include multi-family residences within the Eastern Columbia Bldg. (849 S. Broadway), the Blackstone Apartments across 9th Street (200 W. 9th Street, and the anticipated future residents of the Onni Development currently under construction at 321 W. 9th Street. Given the proximity of these sensitive receptors to the Project Site, the LSTs with receptors located within 25 meters (82.02 feet) are used to address the potential localized air quality impacts

⁹ *South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, page 5-1.*

¹⁰ *South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.*

associated with the construction-related NO_x, CO, PM₁₀, and PM_{2.5} emissions for each construction phase. Sensitive receptors located further than 25 meters would be less impacted by localized emissions.

Localized Construction Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. However, as shown in Table III-4, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for an approximate 1-acre site in SRA 1. These calculations assume that appropriate dust control measures would be implemented as part of the Modified Project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust. Therefore, with implementation of the regulatory code compliance measures identified above, localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant.

Toxic Air Contaminants (TAC)

Similar to the Original Project, the Modified Project consists of a mixed-use development containing dwelling units, retail and restaurant uses and would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants. As such no significant toxic airborne emissions would result from Modified Project implementation. In addition, construction activities would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, impacts associated with the release of toxic air contaminants would be less than significant.

**Table III-4
Localized On-Site Peak Daily Construction Emissions**

Construction Phase ^a	Total On-site Emissions (Pounds per Day)			
	NO _x ^b	CO	PM ₁₀	PM _{2.5}
Site Preparation	13.64	7.34	1.42	0.77
Grading	11.24	8.7	1.56	1.18
Building Construction	13.7	8.21	0.93	0.86
Architectural Coatings	2.19	1.87	0.17	0.17
Paving	9.83	7.24	0.6	0.56
SCAQMD Localized Thresholds	74	680	5	3
<i>Potentially Significant Impact?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>
^a The localized thresholds for all phases are based on a receptor within a distance within 82 feet (25 meters) in SCAQMD's SRA 1 for a Project Site of 1 acre. ^b The localized thresholds listed for NO _x takes into consideration the gradual conversion of NO _x to NO ₂ , and are provided in the mass rate look-up tables in the SCAQMD's "Final Localized Significance Threshold Methodology" guidance document. The analysis of localized air quality impacts associated with NO _x emissions is focused on NO ₂ levels as they are associated with adverse health effects. Source: CalEEMod 2013.2.2, Calculation sheets are provided in Appendix A to this Addendum.				

Point Sources and CO Concentrations

With regard to localized emissions from point sources and motor vehicle travel, the Modified Project's air quality impacts would be similar to the Original Project and less than significant. The Modified Project is a mixed-use retail/residential development project and would not involve any industrial or manufacturing point source emissions. The SCAQMD suggests conducting a CO hotspots analysis for any intersection where a project would worsen the Level of Service (LOS) to any level below C, and for any intersection rated D or worse where the project would increase the V/C ratio by two percent or more. Based on a review of the Project's Traffic Impact Study, none of the study intersections would meet this criteria. Therefore, no further analysis for CO hotspots is warranted and localized operational emissions would be less than significant.

With respect to the mobile source emissions from the proposed parking structure, the proposed above grade parking levels are designed with a solid concrete and masonry walls fronting the Broadway Trade Center to the north and the Eastern Columbia Lofts Building to the east but would be naturally ventilated along the westerly and southerly facades. As such, CO emissions would be adequately ventilated from the parking structure and localized CO concentrations would be less than significant.

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

A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills.

Original Project

No Impact. With respect to construction, the Original Project would utilize typical construction techniques, and the odors would be typical of most construction sites. Additionally, the odors would be temporary, and construction activity associated with the Original project would be required to comply with SCAQMD Rule 402. As such, project construction would not cause an odor nuisance, and odor impacts would be less than significant.

With respect to operation, the Project Site would be developed with residential land uses and not land uses that are associated with odor complaints. On-site trash receptacles used by the new residential land uses could create adverse odors. As trash receptacles would be located and maintained in a manner that promotes odor control, no adverse odor impacts are anticipated from these types of land uses. Therefore, the Original Project would not result in activities that create objectionable odors in violation of SCAQMD Rule 402 and no significant impacts would occur.

Modified Project

No Impact. Similar to the Original Project, the Project involves no elements related to the types of activities discussed above and no odors from these types of uses are anticipated. Garbage collection areas for the Project would have the potential to generate foul odors if the areas are located in close proximity to habitable areas. Good housekeeping practices would be sufficient to prevent nuisance odors. In addition, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Modified Project's long-term operations phase. With implementation of Regulatory Compliance Measure RC-AQ-6 and Project Design Feature PDF-AQ-1, no significant impact would occur with respect to potential operational odors.

Regulatory Compliance Measures:

RC-AQ-6: The Project shall install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138.

Project Design Features:**PDF-AQ-1 Objectionable Odors (Commercial Trash Receptacles)**

- Open trash receptacles shall be located a minimum of 50 feet from the property line of any residential zone or use.
- Trash receptacles located within an enclosed building or structure shall not be required to observe this minimum buffer.

Cumulative Impacts

Less Than Significant Impact. Development of the Modified Project in conjunction with the related projects in the Project Site vicinity would result in an increase in construction and operational emissions in the already urbanized area of the City of Los Angeles.

Cumulative development can affect implementation of the 2012 AQMP. The 2012 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the 2012 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2012 AQMP would not be obstructed by such growth and cumulative impacts would be less than significant. Since the Modified Project is consistent with SCAG's growth projections, it would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the 2012 AQMP would be less than significant.

Cumulative air quality impacts from construction and operation of the Modified Project, based on SCAQMD guidelines, are analyzed in a manner similar to Project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Thus, as discussed in Question 3(c) above, because the construction-related and operational daily emissions associated with Modified Project would not exceed the SCAQMD's recommended thresholds, these emissions associated with the Modified Project would not be cumulatively considerable. Therefore, cumulative air quality impacts would be less than significant.

With respect to cumulative odor impacts, potential sources that may emit odors during construction activities at each related project include the use of architectural coatings, solvents, and asphalt paving. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Modified Project and related projects would not combine to create objectionable construction odors. With respect to operations, SCAQMD Rules 402 (Nuisance) and Rule 1138 (Odor Reducing Equipment) would regulate any objectionable odor impacts from the related projects and the Modified Project's long-term operations phase. Thus, cumulative odor impacts would be less than significant.

IV. BIOLOGICAL RESOURCES

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

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise or light) to a degree that may diminish the chances for long-term survival of a sensitive species.

Original Project

No Impact. The 2007 IS/MND concluded that the Original Project would not result in impacts on any candidate, sensitive, or special status species as the Project Site is currently used as a surface parking lot and no vegetation exists on the Project Site.

Modified Project

No Impact. The Project Site is improved with a paved surface parking lot. As concluded in the 2007 IS/MND, the Project Site does not contain any critical habitat or support any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. However, there are three existing trees (*jacaranda sp.*) on the public right-of-way fronting S. Hill Street and two existing trees (*figus sp.*) on the public-right-of-way fronting W. 9th Street. One of the trees on the public right-of-way fronting S. Hill Street would be removed or relocated to allow for the improvement of the existing sidewalk. The existing trees are not a protected species as defined by the City of Los Angeles' Protected Tree Ordinance, however the removal of street trees is subject to the approval of the Board of Public Works. Therefore, with implementation of Regulatory Code Compliance Measure RC-BIO-1, the Modified Project would have no impact with respect to the removal of street trees.

Nesting birds are protected under the Federal Migratory Bird Treaty Act (MBTA) (*Title 16, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 20*) and Section 3503 of the California Department of Fish and Game Code. Thus, the Project Applicant shall comply with the measures listed below as part of the Modified Project to ensure that no significant impacts to nesting birds would occur. Therefore, with implementation of Regulatory Compliance Measure RC-BIO-2, the Modified Project would have no impact on sensitive biological species or habitat.

Regulatory Compliance Measures:**RC-BIO-1 Tree Removal (Public Right-of-Way)**

Removal of trees in the public right-of-way requires approval by the Board of Public Works.

- The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works (213-847-3077).
- The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Mitigation measures such as replacement by a minimum of 24-inch box trees in the parkway and on the site, on a 1:1 basis, or as otherwise approved, shall be required for the loss of 8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground in the public right-of-way.
- All trees in the public right-of-way shall be provided per the current Urban Forestry Division standards.

RC-BIO-2 Habitat Modification (Nesting Native Birds, Non-Hillside or Urban Areas)

The Modified Project would result in the removal of vegetation and disturbances to the ground and therefore may result in take of nesting native bird species. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).

- Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86).
- If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:
 - a) Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the project site, as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
 - b) If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31.
 - c) Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
 - d) The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

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

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; (c) the alteration of an existing wetland habitat; or (d) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

Original Project

No Impact. No riparian area or other sensitive natural communities exist on-site. Therefore, the Original Project would not result in a substantial adverse effect on riparian habitat or other sensitive natural community.

Modified Project

No Impact. Similar to the Original Project, the Project Site is occupied by a surface parking lot. No riparian or other sensitive natural vegetation communities are located on or adjacent to the Project Site. Therefore, similar to Original Project, implementation of the Modified Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities.

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

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat.

Original Project

No Impact. The Project Site does not contain any federally protected wetlands as defined by Section 404 of the Clean Water Act. Therefore, the Original Project would not result in an adverse impact to federally protected wetlands.

Modified Project

No Impact. The Project Site is entirely developed with impermeable surfaces and does not contain any wetlands or natural drainage channels. Therefore, the Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (see Section 4(b), above), and no

impacts to riparian or wetland habitats would occur with implementation of the Modified Project.

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

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally result in a significant impact on biological resources if it results in the interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species.

Original Project

No Impact. The Project Site and surrounding area is highly urbanized and developed and does not contain, nor is adjacent to, any native wildlife corridor. Therefore, the Original Project would have no impact on the movement of resident or migratory wildlife species.

Modified Project

No Impact. Similar to the Original Project, the Project Site is located in a heavily urbanized area of the City of Los Angeles. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the Project vicinity. Thus, the Modified Project would not interfere with the movement of any residents or migratory fish or wildlife. Therefore no impact would occur.

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

A project-related significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance, 177,404.

Original Project

Less Than Significant Impact. The 2007 IS/MND concluded that the Original Project would include the removal of several ornamental street trees during construction. As such, the removal of street trees would be subject to the provisions of the LAMC and the recommendations of the Department of Public Works, Street Tree Division. Although the Original Project concluded a less than significant impact would occur to biological resources, the following mitigation measure was proposed to further reduce impacts to a less than significant level:

Mitigation Measures:

10. The proposed landscaping plan shall meet all the general goals of the Landscaping Ordinance, including a tree planning scheme that will provide sufficient shade to reduce heat attenuation around buildings. Drip irrigation will be used wherever appropriate, and highly durable, drought tolerant species will be used to the maximum extent feasible.

Modified Project

Less Than Significant Impact. There are no trees on the Project Site, native or otherwise. However, as discussed above, the removal and replacement of one of the existing street trees fronting Hill Street would be subject to the review and approval of the Board of Public Works, Urban Forestry Division. Therefore, compliance with RC-BIO-1 and RC-BIO-2 listed above, and the incorporation of Mitigation Measures 10 from the 2007 IS/MND the Modified Project would not have the potential to conflict with any tree preservation ordinance and any potential impacts associated with the removal of street trees would be mitigated to less than significant levels.

Mitigation Measures:

10. The proposed landscaping plan shall meet all the general goals of the Landscaping Ordinance, including a tree planning scheme that will provide sufficient shade to reduce heat attenuation around buildings. Drip irrigation will be used wherever appropriate, and highly durable, drought tolerant species will be used to the maximum extent feasible.

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

A significant impact would occur if the proposed project would be inconsistent with maps or policies in any conservation plans of the types cited.

Original Project

No Impact. No adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan is in place that includes the Project Site or surrounding properties. Therefore, the Original Project would not conflict with any habitat conservation plans and no impact to any adopted habitat conservation plans would occur.

Modified Project

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

Cumulative Impacts

Less Than Significant Impact. The Modified Project would have a less than significant impact upon biological resources with mitigation. Development of the Modified Project in combination with the 84 related projects would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS. No such habitat occurs in the vicinity of the Project Site or related projects due to the existing urban development. Development of any of the related projects would be subject to the City of Los Angeles Protected Tree Ordinance and the Federal Migratory Bird Treaty Act (MBTA) (*Title 16, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 20*) and Section 3503 of the California Department of Fish and Game Code. Thus, cumulative impacts to biological resources would be considered less than significant and the Modified Project would not make a cumulatively considerable contribution to any impact.

V. CULTURAL RESOURCES

a) Would the project cause a substantial adverse change in the significance of an historic resource pursuant to CEQA § 15064.5?

With respect to the Modified Project, the following section summarizes and incorporates by reference information from the Historic Assessment prepared by Historic Resources Group, Historic Assessment 850 South Hill Street, dated January 29, 2016 (“Historic Assessment”). The Historic Assessment is included as Appendix H of this IS/MND Addendum. The 2007 IS/MND includes the Historical Report as Appendix B, the Vibration Study as Appendix C and the Cultural Resources and Paleontological Records Checks as Appendix D.

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the proposed project results in a substantial adverse change in the significance of a historic resource. Section 15064.5 of the State CEQA Guidelines defines a historical resource as: (1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain State guidelines; or (3) an object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency’s determination is supported by substantial evidence in light of the whole record. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.¹¹

¹¹ CEQA Guidelines, Section 15064.5(b)(1).

Original Project

Potentially Significant Unless Mitigation Incorporated. As analyzed in the 2007 IS/MND, five historical resources listed in or eligible for listing in the National and California registers are located adjacent to the Project Site, which include the National Register-listed Broadway Theater and Commercial District (historic district), Eastern Columbia, May Company (Broadway Trade Center), Coast Federal Savings, and former May Company garage buildings. Twelve additional historical resources are located in the immediate project area. The Original Project's building would closely abut existing buildings to the east (the Eastern Columbia's parking garage) and to the north (May Company building), but would be separated by a seismic separation and would not be physically attached to any existing building. An approximately 44.5-foot wide service yard would separate the Original Project's proposed building from the rear elevation of the Eastern Columbia building. The footprint of the tower portion would be setback approximately 99 feet from the south edge of the Project Site. Since there are no existing buildings on the Project Site, the potential for direct impacts to historical resources would be minimal.

Vibration and Construction

Vibration due to construction was not anticipated to cause a significant adverse impact on the adjacent historical resources, presuming that driven piles are not necessary for new construction. However, should driven piles be part of construction, there is the potential that vibration levels would exceed the threshold of significance and mitigation would be required to ensure that any potential impacts are reduced to a less than significant level. In addition to the potential for damage through vibration, the 2007 IS/MND concluded that excavation and construction methods used for the adjacent new construction could result in settling or displacement of the foundations of the existing historic buildings and lead to material alteration of these resources. With implementation of mitigation measures, the Original Project would be in conformance with the Secretary's Standards, and potential impacts from construction and excavation would be reduced to a less than significant level.

Design Compatibility

The 2007 IS/MND concluded that the Original Project would not materially alter the setting of adjacent or nearby historical resources. While the Original Project's building would be visible from the historic district, its contemporary design would be clearly differentiated and its overall height, building mass, and street setbacks appear to be compatible. As such, the 2007 IS/MND concluded that the setting of the historic district, Eastern Columbia, Broadway Trade Center, Coast Federal Savings, or former May Company garage buildings, or other nearby historical resources, including the historic district, would not be materially altered by the Original Project. The setting and design compatibility of the Original Project is in conformance with the Secretary's Standards. However, the Original Project stated that the setting and design compatibility of the concept layout would need to be further reviewed to ensure a less than significant impact on historical resources, including the historic district. Therefore, mitigation was identified to ensure that impacts would be reduced to a less than significant level.

Mitigation Measures:**Vibration**

11. Prior to commencement of construction of the new building, a qualified structural engineer shall survey the existing foundations and other structural aspects of immediately adjacent historic buildings and provide a shoring design to protect the Eastern Columbia and May Company buildings from potential damage. Pot holing or other destructive testing of the below grade conditions on the project site and immediately adjacent historic buildings may be necessary to establish baseline conditions and prepare the shoring design. If feasible, project, and in particular shoring, design shall avoid pile driving within 25 feet of the existing immediately adjacent historic buildings. The shoring design shall specify threshold limits for vibration causing activities consistent with the ATS report.¹²
12. The qualified structural engineer shall hold a valid license to practice structural engineering in the State of California and have a minimum of 10 years specific experience rehabilitating historic buildings and applying the Secretary's Standards to such projects. The qualified structural engineer shall submit a pre-construction survey letter establishing baseline conditions to be monitored during construction to the lead agency and to the mitigation monitor prior to issuance of any foundation only or building permit for the proposed project.
13. The qualified structural engineer shall monitor vibration during the pile driving or other vibration-causing construction activities to ensure that the impact threshold established in the ATS report and shoring design is not exceeded. If feasible, alternative means of setting piles such as predrilled holes or hydraulic pile driving shall be employed to avoid exceeding the impact threshold established in the ATS report.
14. At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-on letter describing damage, if any, to immediately adjacent historic buildings and recommendations for any repair, as may be necessary, in conformance with the Secretary's Standards. Repairs to immediately adjacent historic buildings shall be undertaken and completed in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24) prior to issuance of any temporary or permanent certificate of occupancy for the new building.

Design Compatibility

15. To ensure compatibility, designs for the proposed new building adjacent to historical resources shall be reviewed, commented on and approved for conformance with Secretary's Standards by a

¹² *ATS Consulting, Vibration Study for the Proposed Residential Tower on 9th Street and Hill, Downtown Los Angeles, dated April 26, 2006. Included in Appendix C of the 2007 IS/MND and included as Appendix I of this Addendum.*

preservation architect meeting the Secretary of the Interior's Professional Qualifications Standards in historic architecture. Modifications recommended by the preservation architect shall be incorporated in the design prior to issuance of building permits for the new building adjacent to historical resources.

16. The qualified preservation architect shall hold a valid license to practice architecture in the State of California and have a minimum of 10 years specific experience rehabilitating historic buildings and applying the Secretary's Standards to such projects. The qualified preservation architect will assess design of the proposed new building for its compatibility in mass, materials, relationship of solids to voids, scale and color with immediately adjacent identified historical resources and with the character of its surroundings. "The relationship of buildings to each other, setbacks... views, driveways and walkways and street trees together create the character of a district or neighborhood."¹³ Without imitating the features of historic buildings, the design for adjacent contemporary buildings should: use similar or complimentary materials, repeat and/or respect the heights of floors, rhythms and depths of bays, use compatible window/door openings and types, and correspond to roof heights and shapes, all of which will help maintain the existing character of the area. A letter summarizing the qualified preservation architect's findings shall be submitted to the lead agency to establish the proposed project's conformance with the Secretary's Standards and compatibility with historical resources prior to issuance of any building permit for the proposed project.

Modified Project

Potentially Significant Unless Mitigation Incorporated. As discussed in the Historic Assessment, the Project Site is located in both the South Park and Historic Core areas of the Central City area. As such, its location can be considered the transitional zone between the Historic Core and South Park. During the final years of the 19th century and the first four decades of the 20th century, the area developed as the primary commercial center for Los Angeles. This history is reflected in the many remaining buildings from that period that characterize the blocks surrounding the Project Site. Historic resources located within and in the near vicinity of the project area that are listed in the National Register, California Register, or designated locally as Historic-Cultural Monuments (HCMs) were identified by consulting the appropriate national, state, and local listings. A list of these resources and their historic designations can be found in Appendix A of the Historic Assessment. An aerial photograph indicating their locations can be found in Figure 1 of the Historic Assessment. A review of the laws, policies, and mechanisms that govern the identification, designation and regulation of historic resources is included in Appendix B of the Historic Assessment.

¹³ *Kay D. Weeks and Anne E. Grimmer, The Secretary of Interior's Standards for the Treatment of Historic Properties With Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings, (National Park Service, 1995).*

The Project Site is just outside the boundary of the Broadway Theater and Commercial District, which was listed in the National Register of Historic Places in 1979. The district boundary was increased to include additional properties in 2002. The current district boundary includes the parcels extending just north of 3rd Street and south of 9th Street. The east and west boundary corresponded to the rear property lines of the buildings which face Broadway. The district contains approximately 70 contributing buildings constructed between 1894 and 1931, including twelve historic theater buildings. The district is a physical documentation of the explosive commercial growth in downtown Los Angeles during the first decades of the 20th century and contains an unusually high concentration of important architectural examples from many of Los Angeles' most notable and prolific architects of the period. As a historic district listed in the National Register, the district is also listed in the California Register and would be considered a historical resource under CEQA. A historic district on Hill Street, approximately one block north of the Project Site (where the northern boundary is 6th Street and the southern boundary is approximately mid-block between 7th and 8th Streets) is under consideration by the City of Los Angeles Office of Historic Resources. Due to the distance of the Project Site to any proposed new historic district, the Modified Project would not have any new significant impacts on historic resources as compared to the Original Project.

Several historic building are located adjacent to the Project Site which include: (1) The former May Company Department Store (Broadway Trade Center), located on the adjacent parcel north of the Project Site on the southwest corner of S. Broadway and W. 8th Street; (2) The Eastern Columbia building, located east of the Project Site at the northwest corner of S. Broadway and W. 9th Street; (3) The former Coast Federal Savings building, located at the northwest corner of S. Hill and W. 9th streets on the opposite side of Hill Street from the Project Site; and (4) The former May Company garage, located at the southeast corner of S. Hill and W. 9th streets on the opposite side of 9th Street from the Project Site.

Design Compatibility

The Modified Project includes the construction of a 27-story (320 feet in height above grade) mixed-use building, consisting of a six story, 76-foot-high podium and a 21-story tower with mechanical penthouse, totaling 320 feet in height, which is 6 stories taller than the Original Project and taller than the adjacent Eastern Columbia building tower. The podium and tower of the Original Project would closely abut the full height of the south façade of the Broadway Trade Center building to the north. The podium of the Original Project would abut the two-story Eastern Columbia garage and the northwest corner of the Eastern Columbia building, located to the east. The podium and tower of the Original Project would be set back from the west façade of the Eastern Columbia building by approximately 45 feet. The tower of the Original Project would be set back approximately 90 feet from the south façade of the podium. Similar to the Original Project, the podium component of the Modified Project would abut the Broadway Trade Center to the north (18 inches from the property line). The podium would abut the two-story Eastern Columbia garage immediately east and would be set back from the west façade of the Eastern Columbia building by approximately 46 feet. The tower component would be set back approximately 25 feet six inches from the Broadway Trade Center to the north, approximately 81 feet from the rear secondary façade of the Eastern Columbia building to the east, and 176 feet from the western face of the Eastern Columbia building clock tower, placing the tower portion of the Modified Project at the south and

west of the Project Site. The full height of the Modified Project is built to the street at the corner of 9th and Hill streets, in conformance with the Historic Downtown Los Angeles Design Guidelines (HDTLADG) for new construction, (pp. 129-131). Additionally, the southeast corner of the podium has been pulled back to a minimum of 12 feet from the northwest corner of the Eastern Columbia building. In the Original Project this corner was within 2 feet of the Eastern Columbia building.

Like the Original Project, the Modified Project would be clearly differentiated from the surrounding historic buildings by its contemporary design and modern materials including concrete, glass, aluminum panels, and perforated metal. The Modified Project is compatible with the adjacent historic resources and the character of the contributing buildings to the adjacent historic district in its rectangular plan, the solid six-story massing of its podium, the pedestrian-oriented retail storefronts along its ground floor street frontage, and the articulation of its façades, all of which reflect the massing, orientation, and articulation of the adjacent and surrounding historic buildings. The Modified Project exhibits several design elements that reinforce its compatibility with adjacent historical resources over that of the Original Project. The podium of the Modified Project includes common design characteristics shared with adjacent historic resources and the historic district. The west and south façades of the Modified Project's podium would be articulated vertically with clearly defined bays that echo the rhythm of the structural bays of the adjacent Broadway Trade Center and garage. The podium would be articulated horizontally to align with the Broadway Trade Center's base, cornice, and windows and recall similar cornice lines and belt courses on the nearby Coast Federal Savings Building and the May Company garage. The primary entrance on Hill Street would feature three tall rectangular bays with precast concrete surrounds that recall the size, proportions, and materials of the prominent central entrance portals with cast-stone surrounds of nearby historic buildings.

Articulation of the podium and tower façades are varied to differentiate base, middle and top sections that recall the tripartite stacked arrangements of the adjacent Broadway Trade Center and the nearby Coast Federal Savings building and May Company garage. Above the glazed storefronts at ground level, the podium level is clad with perforated metal panels and vertical metal louvers. The tower of the Modified Project features exposed slab edges and residential balconies forming continuous horizontal bands that echo the horizontal rhythm of windows and spandrels characteristic on the Broadway Trade Center's Hill Street façade. The same rhythm is also found on the Coast Federal Savings Building across Hill Street and the May Company garage across 9th Street. The modulation of the tower's corner balconies recalls the corner setbacks of the adjacent Eastern Columbia building. The tower portion of the new building would be set back above the podium level along the north and east façades, providing a spatial buffer between the new construction and the two adjacent historic buildings so that the height of the new building would be more compatible with the Broadway Trade Center and Eastern Columbia buildings when viewed from Hill Street and 9th Street.

Downtown Design Guide and Historic Downtown Los Angeles Design Guidelines

The Modified Project is in strict compliance with the Downtown Design Guide. The Original Project provided three levels of parking above the ground floor retail space and two levels of subterranean parking; the Modified Project provides one level of subterranean parking, access to the parking garage at

ground level, three levels of parking screened by architectural elements above ground-floor retail, and one level of parking behind residential units that line the street-facing façades. The Modified Project includes two-story townhouse dwelling units along Hill Street and 9th Street at the fifth story. This habitable level would be directly above the three levels of above-grade parking. The southeast corner of the podium has been pulled back to a minimum of 12 feet from the northwest corner of the Eastern Columbia building. In the Original Project this corner was within 2 feet of the Eastern Columbia building.

The Modified Project provides a comprehensive screening program for the parking levels. No openings in the parking garage facing the Eastern Columbia building are proposed, and a solid wall has been extended approximately 63.5 feet at the portion of the parking podium facing the Eastern Columbia parking garage. A dwelling unit has been added within the podium on the fifth story, facing the Eastern Columbia building, and a window wall has been added at the habitable floor above the enclosed parking levels. A precast concrete framing element has been added to the vertical louvers along 9th and Hill Streets' primary facades of the parking podium to integrate the parking levels with the habitable space above.

The Modified Project also conforms to the HDTLADG. The Original Project conformed to the HDTLADG's New Construction Guidelines, especially "respond[ing] to the existing building context within a block" (p. 131). The articulation of the west (Hill Street) façade of the parking podium aligned with the horizontal cornice and sill lines of the adjacent Broadway Trade Center. These features are retained in the Modified Project, and in addition the west and south façades have been vertically articulated to echo the rhythmic bays of the Broadway Trade Center and garage to carry a consistent scale through the entire block, in accordance with the HDTLADG's Appendix 3, p. 29. The full height of the Modified Project is built to the street at the corner of 9th and Hill streets, in conformance with the HDTLADG for new construction, (pp. 129-131).

Impacts to Adjacent Historic Resources

As disclosed in the Phase I ESA (See Appendix D of this Addendum), a six-story building was located on the Project Site on the westerly side of the Eastern Columbia Building and was subsequently demolished in the late 1980's. Because the Project Site is currently occupied by a surface parking lot and new construction would be contained within the Project Site, the Modified Project, like the Original Project, would not demolish, rehabilitate or relocate the adjacent Broadway Trade Center, the Eastern Columbia Building or any historic resource in the near vicinity. Nor would the Modified Project alter the Eastern Columbia Building. Both the Original Project and the Modified Project would alter the Broadway Trade Center to the north. Both Projects would abut the south façade of the Broadway Trade Center, which would visually obstruct that façade and require the infill of a number of its windows. Because the south façade of the Broadway Trade Center is a secondary, utilitarian façade and lacks the architectural detail of the building's three primary façades, the 2007 IS/MND determined that these alterations would result in a less than significant impact. The south façade of the Broadway Trade Center contains approximately 157 windows of various sizes. The Modified Project would require the infill of approximately 27 windows. Because the tower of the Modified Project would be set back approximately 26 feet from the Broadway Trade Center, obstructing less of that building's south façade and requiring the infill of fewer windows, the potential impact of the Modified Project would be less than that of the Original Project.

As was true with the Original Project, the Modified Project does have the potential to compromise the structural integrity of adjacent historic resources through excavation and construction procedures. Without proper mitigation to protect the Broadway Trade Center and the Eastern Columbia building from this potential damage, the Modified Project may result in a significant impact to the adjacent historic resources. With mitigation, the Modified Project would not result in a substantial adverse change in the significance of the adjacent Broadway Trade Center, Eastern Columbia building, or the Broadway Theater and Commercial District.

Alterations to Surroundings of the Broadway Trade Center and Eastern Columbia Building

The podium of the Modified Project would be set back approximately 46 feet from the west façade of the Eastern Columbia building, compared to an approximately 45.5-foot setback of both the podium and tower of the Original Project. The tower of the Modified Project would be set back approximately 81 feet from the west façade of the Eastern Columbia building, significantly more than the 45.5-foot setback of the tower in the Original Project. The tower of the Modified Project would have no setback from the south façade of its podium. Similar to the Original Project, the Modified Project would partially block views to the south façade of the Broadway Trade Center when viewed looking north from 9th Street and Hill Street. The south façade of the Broadway Trade Center is a secondary “lot line” façade left largely unarticulated in anticipation of potential construction on the neighboring lot. Full view of this façade is not critical to understanding the historic significance of the Broadway Trade Center. That said, the Modified Project would obscure less of the Broadway Trade Center’s south façade than the Original Project given that the mass of the Original Project was wider than the Modified Project when viewed from the west, and the full height of the Original Project would be constructed directly abutting the Broadway Trade Center on the south. The Modified Project would directly abut the Broadway Trade Center only at the podium level with the tower portion set back 26 feet from Broadway Trade Center. The south façade of the Broadway Trade Center would remain partially visible after construction of the Modified Project.

The Modified Project would obscure views of the west façade of the Eastern Columbia building when viewed from the west looking east. With the exception of the clock tower, the west façade of the Eastern Columbia building represents the rear of the building, and its facades. Full view of the west façade is not critical to understanding the historic significance of the Eastern Columbia building. The Modified Project would obscure views of the Eastern Columbia’s west façade when viewed looking east from Hill Street. Views of the Eastern Columbia’s west facade from Hill Street were also partially obscured by the Original Project. The Eastern Columbia building is currently obscured by existing buildings when viewed looking east from 9th Street west of Olive Street. Between Olive and Hill streets, the Modified Project would also partially obscure views to the Eastern Columbia building. Because it is set back from the west, the Eastern Columbia clock tower is currently only intermittently visible from 9th Street at this close range, as it is often obscured by the lower volumes of the Eastern Columbia building depending on where the viewer is positioned. As depicted in Figures III-1 through III-4, and discussed in Checklist Question I (a), views of the Eastern Columbia Building’s clock tower would not be significantly impacted by the addition of the Modified Project.

Mitigation Measures 11 through 16 of the Original Project have been incorporated in this Addendum. Mitigation Measure 14 of the Original Project has been updated in the Addendum to ensure that adjacent historic buildings are accessible to perform repairs. The second sentence now reads, “Repairs to immediately adjacent historic buildings shall be undertaken, or performance bonds securing the same, and completed in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24) prior to issuance of any temporary or permanent certificate of occupancy for the new building.” Therefore, with implementation of the Mitigation Measures identified below, impacts to the significance of a historic resource resulting from the development of the Modified Project would be reduced to a less than significant level.

Mitigation Measures:

Vibration

11. Prior to commencement of construction of the new building, a qualified structural engineer shall survey the existing foundations and other structural aspects of immediately adjacent historic buildings and provide a shoring design to protect the Eastern Columbia and May Company buildings from potential damage. Pot holing or other destructive testing of the below grade conditions on the project site and immediately adjacent historic buildings may be necessary to establish baseline conditions and prepare the shoring design. If feasible, project, and in particular shoring, design shall avoid pile driving within 25 feet of the existing immediately adjacent historic buildings. The shoring design shall specify threshold limits for vibration causing activities consistent with the ATS report.¹⁴
12. The qualified structural engineer shall hold a valid license to practice structural engineering in the State of California and have a minimum of 10 years specific experience rehabilitating historic buildings and applying the Secretary's Standards to such projects. The qualified structural engineer shall submit a pre-construction survey letter establishing baseline conditions to be monitored during construction to the lead agency and to the mitigation monitor prior to issuance of any foundation only or building permit for the proposed project.
13. The qualified structural engineer shall monitor vibration during the pile driving or other vibration-causing construction activities to ensure that the impact threshold established in the ATS report and shoring design is not exceeded. If feasible, alternative means of setting piles such as predrilled holes or hydraulic pile driving shall be employed to avoid exceeding the impact threshold established in the ATS report.

¹⁴ *ATS Consulting, Vibration Study for the Proposed Residential Tower on 9th Street and Hill, Downtown Los Angeles, dated April 26, 2006. Included in Appendix C of the 2007 IS/MND and included as Appendix I of this Addendum.*

14. At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-on letter describing damage, if any, to immediately adjacent historic buildings and recommendations for any repair, as may be necessary, in conformance with the Secretary's Standards. Repairs to immediately adjacent historic buildings shall be undertaken, or performance bonds securing the same, and completed in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24) prior to issuance of any temporary or permanent certificate of occupancy for the new building.

Design Compatibility

15. To ensure compatibility, designs for the proposed new building adjacent to historical resources shall be reviewed, commented on and approved for conformance with Secretary's Standards by a preservation architect meeting the Secretary of the Interior's Professional Qualifications Standards in historic architecture. Modifications recommended by the preservation architect shall be incorporated in the design prior to issuance of building permits for the new building adjacent to historical resources.
16. The qualified preservation architect shall hold a valid license to practice architecture in the State of California and have a minimum of 10 years specific experience rehabilitating historic buildings and applying the Secretary's Standards to such projects. The qualified preservation architect will assess design of the proposed new building for its compatibility in mass, materials, relationship of solids to voids, scale and color with immediately adjacent identified historical resources and with the character of its surroundings. "The relationship of buildings to each other, setbacks... views, driveways and walkways and street trees together create the character of a district or neighborhood."¹⁵ Without imitating the features of historic buildings, the design for adjacent contemporary buildings should: use similar or complimentary materials, repeat and/or respect the heights of floors, rhythms and depths of bays, use compatible window/door openings and types, and correspond to roof heights and shapes, all of which will help maintain the existing character of the area. A letter summarizing the qualified preservation architect's findings shall be submitted to the lead agency to establish the proposed project's conformance with the Secretary's Standards and compatibility with historical resources prior to issuance of any building permit for the proposed project.

¹⁵ *Kay D. Weeks and Anne E. Grimmer, The Secretary of Interior's Standards for the Treatment of Historic Properties With Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings, (National Park Service, 1995).*

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

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with the project would disturb archaeological resources.

Original Project

Potentially Significant Unless Mitigation Incorporated. As concluded in the 2007 IS/MND, no recorded archaeological sites are known to exist on the project sites or in the vicinity (within 0.25 mile). Such records indicate that the locale has a low potential for archaeological resources. The Original Project proposed to construct two levels of subterranean parking. As such, the remote possibility exists that archaeological resources may be encountered at deeper levels during site excavation. Since any unknown resources would be altered or destroyed by site excavation or other construction activities, discovery of archeological resources during construction shall be treated in accordance with applicable federal, state and local guidelines. With the implementation of the recommended mitigation measures, impacts on archeological resources would be less than significant.

Mitigation Measures:

17. During excavation and grading, if archaeological resources are uncovered, all work in that area shall cease and be diverted so as to allow for a determination of the value of the resource. Construction activities in that area may commence once the uncovered resources are collected by an archaeologist and properly processed. Any archaeological remains and/or reports and surveys shall be submitted to the UCLA Archaeological Information Center.
18. The Applicant shall sign a covenant and agreement with the City to allow suspension of construction activities for the recovery or recordation of all archaeological resources prior to the issuance of a building permit.

Modified Project

Potentially Significant Unless Mitigation Incorporated. No known archaeological sites are identified on the Project Site. There is no evidence that suggests any archaeological sites or archaeological resources exist on the Project Site.¹⁶ The Project Site has been previously developed and is located in a highly urbanized area of Downtown Los Angeles. Historic information from the Phase I ESA Report (See Appendix D of this Addendum) indicates that the Project Site was used for single and multi-family residential housing from 1888 to 1912. In the 1910s the Project Site was developed with multi-story retail stores, office spaces and hotel uses. In the 1930s, the northern portion of the Project Site was cleared for automobile parking and a fruit stand. In 1944, a six-story building located on the Project Site (848-850 S.

¹⁶ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.*

Hill Street) was altered to garment manufacturing. In 1988, the Project Site was converted into the parking lot that is currently operating. Two buildings located on the Project Site, including a three-story building located at 846 South Hill and the six-story building were demolished. The basement of the six-story building was backfilled. The Modified Project would include demolition of the surface parking lot and grading activities for construction of the proposed building. Thus, similar to the Original Project, the potential exists for the accidental discovery of archaeological materials. Because the presence or absence of such materials cannot be determined until the Project Site is excavated, implementation of Mitigation Measures 17 and 18 of the Original Project are included in this Addendum. Mitigation Measure 18 of the Original Project has been updated in this Addendum to reflect that currently archaeological remains and/or reports and surveys are submitted to the South Central Coastal Information Center, California State University, Fullerton. Implementation of these mitigation measures would ensure that if any archaeological resources are encountered during construction, impacts to such resources would remain less than significant.

Mitigation Measures:

17. During excavation and grading, if archaeological resources are uncovered, all work in that area shall cease and be diverted so as to allow for a determination of the value of the resource. Construction activities in that area may commence once the uncovered resources are collected by an archaeologist and properly processed. Any archaeological remains and/or reports and surveys shall be submitted to the ~~UCLA Archaeological Information Center~~ South Central Coastal Information Center, California State University, Fullerton.
18. The Applicant shall sign a covenant and agreement with the City to allow suspension of construction activities for the recovery or recordation of all archaeological resources prior to the issuance of a building permit.

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

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with the Modified Project were to disturb paleontological resources or geologic features which presently exist within the project site.

Original Project

Potentially Significant Unless Mitigation Incorporated. No vertebrate localities are recorded at or within 0.25 mile of the Project Site. The remote possibility exists that excavation for the proposed two level subterranean parking garage may uncover vertebrate or invertebrate fossils. Since any unknown resources would be altered or destroyed by site excavation or other construction activities, discovery of paleontological resources during construction shall be treated in accordance with applicable federal, state and local guidelines. With the implementation of the recommended mitigation measures, impacts on paleontological resources would be less than significant.

Mitigation Measures:

19. During excavation and grading, if paleontological resources are uncovered, all work in that area shall cease and be diverted so as to allow for a determination of the value of the resource. Construction activities in that area may commence once the uncovered resources are collected by a paleontologist and properly processed. Any paleontological remains and/or reports and surveys shall be submitted to the Los Angeles County Natural History Museum.
20. The Applicant shall sign a covenant and agreement with the City to allow the suspension of construction activities for the recovery or recordation of all paleontological resources prior to the issuance of a building permit.

Modified Project

Potentially Significant Unless Mitigation Incorporated. The Project Site has been previously graded and is currently improved with a paved surface parking lot. The Project Site and immediate surrounding areas do not contain any known vertebrate paleontological resources.¹⁷ Although no paleontological resources are known to exist on-site, there is a potential for paleontological resources to exist at sub-surface levels on the Project Site, which may be uncovered during excavation for the proposed one level subterranean parking garage and grading activities for construction of the proposed building. With respect to the discovery of paleontological resources during construction, implementation of Mitigation 19 and 20 of the Original Project, would ensure that if any such resources are found during construction of the Modified Project, they would be handled according to the proper regulations. As such, potential impacts would be reduced to less than significant levels.

Mitigation Measures:

19. During excavation and grading, if paleontological resources are uncovered, all work in that area shall cease and be diverted so as to allow for a determination of the value of the resource. Construction activities in that area may commence once the uncovered resources are collected by a paleontologist and properly processed. Any paleontological remains and/or reports and surveys shall be submitted to the Los Angeles County Natural History Museum.
20. The Applicant shall sign a covenant and agreement with the City to allow the suspension of construction activities for the recovery or recordation of all paleontological resources prior to the issuance of a building permit.

¹⁷ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Vertebrate Paleontological Resources in the City of Los Angeles, September 1996.*

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

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect could occur if grading activities associated with the project would disturb previously interred human remains.

Original Project

Potentially Significant Unless Mitigation Incorporated. The site is currently developed and no human remains are known to be present. In the event that excavation does uncover previously interred human remains, these would be treated in accordance with appropriate state and federal guidelines. With the implementation of the recommended mitigation measures, impacts on previously unidentified human remains would be less than significant.

Mitigation Measures:

21. If human remains are discovered within either development parcel, work at the specific construction site shall be suspended, and the City Department of Building and Safety and County Coroner shall be notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours and the guidelines of the NAHC shall be implemented in the treatment and disposition of the remains.
22. The Applicant shall sign a covenant and agreement with the City to allow suspension of construction activities for the recovery of all human remains prior to the issuance of a building permit.

Modified Project

Potentially Significant Unless Mitigation Incorporated. No known human burials have been identified on the Project Site or its vicinity. However, it is possible that unknown human remains could occur on the Project Site, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur. With respect to the discovery of human remains during construction, Mitigation Measure 21 and 22 of the Original Project would be implemented to reduce potential impacts related to the disturbance of unknown human remains to a less than significant level.

Mitigation Measures:

21. If human remains are discovered within either development parcel, work at the specific construction site shall be suspended, and the City Department of Building and Safety and County Coroner shall be notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours

and the guidelines of the NAHC shall be implemented in the treatment and disposition of the remains.

22. The Applicant shall sign a covenant and agreement with the City to allow suspension of construction activities for the recovery of all human remains prior to the issuance of a building permit.

Cumulative Impacts

Less Than Significant Impact. Implementation of the Modified Project, in combination with the other 84 related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. Each of the related projects would be subject to site plan review by the Los Angeles Department of City Planning for review and approval. Each project is also subject to CEQA review. The review process would ensure each project is designed and constructed in a manner that is consistent with the Downtown Design Guide, the Historical Downtown Los Angeles Design Guidelines and State law, as applicable, to ensure compatibility with the existing historical form and character of the surrounding environment. The analysis of the Modified Project's impacts to cultural resources concluded that the Modified Project would have no significant impacts with respect to cultural resources following appropriate mitigation. Therefore, the Modified Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to cultural resources would be less than significant.

VI. GEOLOGY AND SOILS

With respect to the Modified Project, the following section summarizes and incorporates by reference information from the Geotechnical Report prepared by Geocon West, Inc., Preliminary Geotechnical Investigation Proposed Alexan South Broadway High-Rise Development 850 South Hill Street Los Angeles, California, dated January 5, 2016 ("Geotechnical Report"), the Geology and Soils Letter, prepared by the Department of Building and Safety, dated February 3, 2016, and Geocon West, Inc.'s response to the City Engineer's Geology and Soils Letter, dated March 2, 2016. These technical reports and correspondences are included as Appendix B of this IS/MND Addendum. The Geotechnical Report prepared for the Original Project is contained in Appendix E in the 2007 IS/MND.

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

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone.

Original Project

Less Than Significant. As discussed in the 2007 IS/MND, the Project Site is not located in an Alquist-Priolo Fault Study Zone. Since no active fault zones are located within or adjacent to the Project Site, the potential for surface ground rupture is considered remote. Therefore, the impact of the Original Project relative to fault rupture would be less than significant.

Modified Project

Less Than Significant Impact. Based on the information contained in the Geotechnical Report by Geocon West, Inc., the Project Site is not within a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards. No active or potential active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, the potential for surface rupture due to faulting occurring beneath the Project Site during the design life of the Modified Project is considered low. However, the Project Site is located in the seismically active Southern California region, and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults.

The closest surface trace of an active fault to the site is the Hollywood Fault located approximately 4.9 miles north-northwest of the Project Site (Ziony and Jones, 1989). Other nearby active faults are the Raymond Fault, the Newport-Inglewood Fault Zone, the Verdugo Fault, and the Santa Monica Fault located approximately 5.7 miles north-northeast, 6.2 miles west-southwest, 7.5 miles northeast, and 9.3 miles west of the Project Site respectively (Ziony and Jones, 1989). The active San Andreas Fault Zone is located approximately 35.4 miles northeast of the Project Site.

The closest potentially active fault to the Project Site is the MacArthur Fault located approximately 0.9-mile north-northwest of the Project Site (Ziony and Jones, 1989). Other nearby potentially active faults are the Coyote Pass Fault, the Overland Fault, and the Charnock Fault located approximately 3.6 miles east, 7.5 miles southwest, and 8.9 miles southwest of the Project Site, respectively (Ziony and Jones, 1989).

Several buried thrust faults, commonly referred to as blind thrusts, underlie the Los Angeles Basin at depth. These faults are not exposed at the ground surface and are typically identified at depths greater than 3.0 kilometers. The October 1, 1987 M_w 5.9 Whittier Narrows earthquake and the January 17, 1994 M_w 6.7 Northridge earthquake were a result of movement on these buried thrust faults. The Los Angeles segment of the Puente Hills Blind Thrust and the Upper Elysian Park Blind Thrust underlie the project Site at depth. These thrust faults are not exposed at the surface and do not present a potential surface fault rupture hazards; however, these active features are capable of generating future earthquakes. The Project Site could be subjected to strong ground shaking in the event of an earthquake. However, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices.

Based on these considerations, the potential for surface ground rupture at the Project Site is considered low, and the potential for impacts associated with surface fault rupture would be considered less than significant. Potential impacts associated with seismic safety would remain less than significant with incorporation of the following Regulatory Compliance Measure:

Regulatory Compliance Measures:

RC-GEO-1 The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

b) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California.

Original Project

Potentially Significant Unless Mitigation Incorporated. As concluded in the 2007 IS/MND, the Original Project would be designed and constructed in accordance with State and local building codes to reduce the potential for exposure of people or structures to seismic risks to the extent possible. The proposed buildings would be designed to resist ground shaking through modern construction techniques. The project would comply with the California Department of Conservation, Division of Mines and Geology (CDMG) Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California (1997), 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 Los Angeles Municipal Code (LAMC). With the implementation of mitigation measures and existing building regulations, the project would have a less than significant impact relative to ground shaking and other seismic risks.

Mitigation Measures:

23. Unless otherwise so specified by the City of Los Angeles, the proposed project shall demonstrate compliance with specific recommendations of the geotechnical engineering report prepared by Geotechnologies, Inc. dated May 2, 2006, and contained herein as Appendix C, to the satisfaction of the City of Los Angeles Department of Building and Safety, as conditions to issuance of any grading and building permits.
24. The project shall conform to applicable criteria set forth in the Recommended Lateral Force Requirements and Commentary by the Structural Engineers Association of California.

25. Seismic design for structures and foundations shall comply with the parameters outlined in the 1997 Uniform Building Code as designated for site-specific soil conditions.
26. The project shall be designed to conform to the City of Los Angeles Seismic Safety Plan, and additional seismic safety requirements not encompassed by compliance with the Building Code and Grading Ordinance as may be identified by the Department of Building and Safety prior to Plan Check approval.
27. The structural design of the project shall comply with the seismic standards of the Uniform Building Code according to the seismic zone and construction type (S_c based on Table 16-J of the UBC).

Modified Project

Potentially Significant Unless Mitigation Incorporated. The Project Site is located within a seismically active region, as is all of Southern California. The intensity of ground shaking depends upon the earthquake magnitude, the distance from the source, and the site response characteristics. The Project Site not located within a seismic hazard zone for liquefaction, landsliding or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act and the Alquist-Priolo Act. The primary seismic hazard for this Project Site is the potential for strong ground motion from future earthquakes within the Los Angeles Basin. However, the potential for strong ground motion at the Project Site is not unusual for Southern California. Site parameters for seismic design are presented in the Geotechnical Report.

It is anticipated that a site-specific ground motion hazard analysis would be necessary in order to satisfy the requirements of the City of Los Angeles Tall Buildings Structural Design Council. The analysis would generate a site-specific target response spectrum, which would be used to match earthquake time history records for the structural engineer's use in analyzing the seismic response of the structure. The analysis would incorporate the results of the measured shear wave velocity obtained from downhole suspension logging. It is recommended that the site-specific ground motion hazard analysis be performed subsequent to commencement of the initial structural design. As such, the Project Site is considered suitable for the construction of the Modified Project provided that the recommendations specified in the Geotechnical Report are included in the design and construction of the Modified Project to the satisfaction of the Department of Building and Safety. Sign off from the Department of Building and Safety would ensure that Modified Project meets the applicable performance measures. Accordingly, compliance with Mitigation Measures 23 through 27 of the Original Project, included in this Addendum, would reduce impacts associated with seismic hazards to a less than significant level. Additionally, Mitigation Measure 23 has been updated to reflect compliance with the current Geotechnical Report, which replaces the Geotechnical Report of the Original Project. The Geotechnical Report for the Original Project analyzed greater excavation requirements and a deeper footprint than what is proposed by the Modified Project. Additionally, Mitigation Measure 25 and 27 have been updated to reflect compliance with the current Building Code for the State of California as the 1997 UBC has been superseded by the 2013 California Building Code, pursuant to state law.

Mitigation Measures:

23. Unless otherwise so specified by the City of Los Angeles, the proposed project shall demonstrate compliance with specific recommendations of the geotechnical engineering report prepared by ~~Geotechnologies, Inc. dated May 2, 2006, and contained herein as Appendix C~~ Geocon West, Inc., dated January 5, 2016, and contained herein as Appendix B, to the satisfaction of the City of Los Angeles Department of Building and Safety, as conditions to issuance of any grading and building permits.
 24. The project shall conform to applicable criteria set forth in the Recommended Lateral Force Requirements and Commentary by the Structural Engineers Association of California.
 25. Seismic design for structures and foundations shall comply with the parameters outlined in the ~~1997 Uniform Building Code~~ 2013 California Building Code as designated for site-specific soil conditions.
 26. The project shall be designed to conform to the City of Los Angeles Seismic Safety Plan, and additional seismic safety requirements not encompassed by compliance with the Building Code and Grading Ordinance as may be identified by the Department of Building and Safety prior to Plan Check approval.
 27. The structural design of the project shall comply with the seismic standards of the ~~Uniform Building Code~~ California Building Code according to the seismic zone and construction type (S_c based on Table 16-J of the UBC).
- c) **Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?**

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a Project Site is located within a liquefaction zone.

Original Project

Less Than Significant. As analyzed in the 2007 IS/MND, the historically highest groundwater level in the project area is approximately 100 feet below grade and groundwater was not encountered in any subsurface exploration up to 50 feet below ground surface (See Appendix E of the 2007 IS/MND for the Original Project's Geotechnical Report). The analysis indicated that site soils would not be considered prone to liquefaction and therefore a less than significant impact would occur.

Modified Project

Less Than Significant. Liquefaction is the loss of soil strength or stiffness due to a buildup of pore-water pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction is

associated primarily with loose (low density), saturated, fine- to medium-grained, cohesionless soils. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures. Similar to the findings of the 2007 IS/MND, a review of the State of California Seismic Hazard Zone Map for the Hollywood Quadrangle (1999) indicates that the Project Site is not located within an area identified as having a potential for liquefaction. Additionally, the Project Site is not located within an area identified as having a potential for liquefaction as identified in the County of Los Angeles Safety Element of the General Plan (Leighton, 1990) and the City of Los Angeles Safety Element of the General Plan (1996). Based on a review of the Seismic Hazard Zone for the Los Angeles 7.5 Minute Quadrangle (California Division of Mines and Geology, 1998), the historically highest groundwater at the Project Site is 90 to 100 feet below the ground surface and the lowest point of the building and footings would be above this ground water level. Groundwater was not encountered in the borings drilled to a maximum depth of 160 feet beneath the existing ground surface. However, water seepage was encountered in boring 2 at a depth of 130 feet beneath the existing ground surface. Based on these considerations, the potential for liquefaction of the Project Site is very low, and no surface manifestations of liquefaction are expected at the Project Site. Therefore, a less than significant impact would occur with respect to liquefaction.

d) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

Original Project

No Impact. The Project Site and the surrounding area are not located in or on a hillside, nor are the Project Site and surrounding area identified as susceptible to landslides. The probability of seismically induced landslides is considered low due to the lack of significant slopes on the Project Site and in surrounding area. Therefore, no impact relative to landslides would occur at the Project Site.

Modified Project

No Impact. A project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding. According to the Geotechnical Report, the topography at the Project Site is relatively level and the topography in the immediate Project Site vicinity slopes gently to the south. The Project Site is not located within a City of Los Angeles Hillside Grading Area or Hillside Ordinance Area (City of Los Angeles, 2015). The County of Los Angeles Safety Element (Leighton, 1990), indicates the Project Site is not within an area identified as having a potential for slope instability. Additionally, the Project Site is not within an area identified as having a potential for seismic slope instability (CDMG, 1999). There are no known landslides near the Project Site, nor is the Project Site in the path of any known or potential landslides. Therefore, the potential for slope stability hazards to adversely affect the Proposed Development is considered low.

Therefore, the probability of landslides, including seismically induced landslides, is considered to be very low and no impact would occur.

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

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have significant sedimentation or erosion impact if it would: (a) constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or (b) accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site.

Original Project

Potentially Significant Impact Unless Mitigation Incorporated. Construction activities would expose soils to wind and rainfall. No continued erosion potential would exist after completion of construction. With the implementation of water quality control and erosion control permits required by the Los Angeles Regional Water Quality Control Board and the City of Los Angeles and the mitigation measures listed below, the Original Project would have a less than significant impact relative to soil erosion during project construction.

Mitigation Measures:

28. During inclement periods of the year, when rain is threatening (between November 1 and April 15, per the Los Angeles Building Code, Sec. 7002.) an erosion control plan that identifies BMPs shall be implemented to the satisfaction of the City of Los Angeles Department of Building and Safety to minimize potential erosion during construction. The erosion control plan shall be a condition to issuance of any grading permit.
29. To the extent feasible, grading shall be scheduled for completion prior to the start of the rainy season (between November 1 and April 15 per the Los Angeles Building Code, Sec.7002) or detailed temporary erosion control plans shall be implemented in a manner satisfactory to the City of Los Angeles Department of Public Works.
30. Appropriate erosion control and drainage devices shall be incorporated to the satisfaction of the Department of Building and Safety. Such measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, as well as planting fast-growing annual and perennial grasses in areas where construction is not immediately planned. These will shield and bind the soil.
31. If temporary excavation slopes are to be maintained during the rainy season, it will be necessary to direct all drainage away from the top of the slope. No water shall be allowed to flow uncontrolled over the face of any temporary or permanent slope.

32. Provisions shall be made for adequate surface drainage away from the areas of excavation as well as protection of excavated areas from flooding. The grading contractor shall control surface water and the transportation of silt and sediment.

Modified Project

Potentially Significant Impact Unless Mitigation Incorporated. Although development of the Modified Project has the potential to result in the erosion of soils during site preparation and construction activities, erosion would be reduced by implementation of stringent erosion controls imposed by the City of Los Angeles through grading and building permit regulations. Minor amounts of erosion and siltation could occur during grading. The potential for soil erosion during the ongoing operation of the Modified Project is extremely low due to the generally level topography of the Project Site, and the fact that the Project Site would be mostly paved-over or built upon so little soil would be exposed. All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. Furthermore, as discussed in Section IX. Hydrology and Water Quality, the Modified Project would be required to implement a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan and Best Management Practices. Therefore, with incorporation of Mitigation Measures 28 through 32 of the 2007 IS/MND, which have been included in this Addendum, impacts associated with soil erosion and loss of topsoil would remain less than significant. Additionally, Mitigation Measures 28 and 29 have been updated to reflect Chapter IX, Division 70 of the Los Angeles Municipal Code, which defines the “rainy season” from October 1 through April 15.

Mitigation Measures:

28. During inclement periods of the year, when rain is threatening (~~between November 1 and April 15, per the Los Angeles Building Code, Sec. 7002.~~) (between October 1 and April 15 per Chapter IX, Division 70 of the Los Angeles Municipal Code) an erosion control plan that identifies BMPs shall be implemented to the satisfaction of the City of Los Angeles Department of Building and Safety to minimize potential erosion during construction. The erosion control plan shall be a condition to issuance of any grading permit.
29. To the extent feasible, grading shall be scheduled for completion prior to the start of the rainy season (~~between November 1 and April 15, per the Los Angeles Building Code, Sec. 7002.~~) (between October 1 and April 15 per Chapter IX, Division 70 of the Los Angeles Municipal Code) or detailed temporary erosion control plans shall be implemented in a manner satisfactory to the City of Los Angeles Department of Public Works.
30. Appropriate erosion control and drainage devices shall be incorporated to the satisfaction of the Department of Building and Safety. Such measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, as

well as planting fast-growing annual and perennial grasses in areas where construction is not immediately planned. These will shield and bind the soil.

31. If temporary excavation slopes are to be maintained during the rainy season, it will be necessary to direct all drainage away from the top of the slope. No water shall be allowed to flow uncontrolled over the face of any temporary or permanent slope.
 32. Provisions shall be made for adequate surface drainage away from the areas of excavation as well as protection of excavated areas from flooding. The grading contractor shall control surface water and the transportation of silt and sediment.
- f) **Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?**

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it could cause or accelerate geologic hazards causing substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

Original Project

Potentially Significant Unless Mitigation Incorporated. Based on the conclusions of the Geotechnical Report conducted for the Original Project, the possibility of secondary seismic hazards such as landsliding, liquefaction, seismically induced settlement are considered very low to non-existent. Development of the Original Project is considered feasible from a geotechnical standpoint, presuming that engineering recommendations identified by the investigation as called for by Mitigation Measures 23 of the 2007 IS/MND. In addition, implementation of the Mitigation Measures 33 below, would ensure that the project would have a less than significant impact relative to unstable soil.

Mitigation Measures:

33. The project shall comply with the following Department of Building and Safety requirements (if not already covered by mitigation measure 23), prior to issuance of a grading permit for the project:
 - Prior to the issuance of a grading permit by the Department of Building and Safety, the consulting geologist and soils engineer shall review and approve project grading plans. This approval shall be conferred by signature on the plans which clearly indicate the geologist and/or soils engineer have reviewed the plans prepared by the design engineer and that the plans include the recommendations contained in the report.
 - Prior to the commencement of grading activities, a qualified geotechnical engineer and engineering geologist shall be employed for the purpose of observing earthwork procedures and testing fills for conformance to the recommendations of the City Engineer, approved grading

plans, applicable grading codes, and the geotechnical report approved to the satisfaction of the Department of Building and Safety.

- During construction, Grading shall be observed, and reported by the project engineer. Grading shall be performed under the supervision of a licensed engineering geologist and/or soils engineer in accordance with applicable provisions of the Building Code and to the satisfaction of the City Engineer and the Superintendent of Building and Safety.
- Any recommendations prepared by the consulting geologist and/or soils engineer for correction of geologic hazards, if any, encountered during grading shall be submitted to the Department of Building and Safety for approval prior to issuance of a Certificate of Occupancy for the project.
- Grading and excavation activities shall be undertaken in compliance with all relevant requirements of the California Division of Industrial safety, the Occupational Safety and Health Act of 1970 and the Construction Safety Act.

Modified Project

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the Modified Project is built in an unstable area without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. The Geotechnical Report concluded that the potential for seismically induced settlement at the Project Site is considered small, and the geotechnical conditions are favorable for the Project provided that the recommendations specified in the Geotechnical Report are included in the design and construction of the Modified Project to the satisfaction of the Department of Building and Safety. The Project Site is not within a liquefaction zone and is not located in an area that is susceptible to liquefaction or collapse. However, the sandy alluvial deposits would be prone to local raveling or caving, particularly if localized seepage is present and a temporary shoring system with lagging would be required. The Modified Project would comply with the Los Angeles Building Code and in accordance with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Modified Project. Therefore, with implementation of Regulatory Compliance Measures RC-GEO-1 (Seismic) and Mitigation Measure 33 of the 2007 IS/MND, impacts would be mitigated to a less than significant level.

Mitigation Measures:

33. The project shall comply with the following Department of Building and Safety requirements (if not already covered by mitigation measure 23), prior to issuance of a grading permit for the project:
- Prior to the issuance of a grading permit by the Department of Building and Safety, the consulting geologist and soils engineer shall review and approve project grading plans. This approval shall be conferred by signature on the plans which clearly indicate the geologist and/or soils engineer have reviewed the plans prepared by the design engineer and that the plans include the recommendations contained in the report.
 - Prior to the commencement of grading activities, a qualified geotechnical engineer and engineering geologist shall be employed for the purpose of observing earthwork procedures

and testing fills for conformance to the recommendations of the City Engineer, approved grading plans, applicable grading codes, and the geotechnical report approved to the satisfaction of the Department of Building and Safety.

- During construction, Grading shall be observed, and reported by the project engineer. Grading shall be performed under the supervision of a licensed engineering geologist and/or soils engineer in accordance with applicable provisions of the Building Code and to the satisfaction of the City Engineer and the Superintendent of Building and Safety.
- Any recommendations prepared by the consulting geologist and/or soils engineer for correction of geologic hazards, if any, encountered during grading shall be submitted to the Department of Building and Safety for approval prior to issuance of a Certificate of Occupancy for the project.
- Grading and excavation activities shall be undertaken in compliance with all relevant requirements of the California Division of Industrial Safety, the Occupational Safety and Health Act of 1970 and the Construction Safety Act.

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

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

Original Project

Less Than Significant Impact. The Geotechnical Report for the Original Project concluded that on-site earth materials are in the very low expansion rang, although there are occasional zones of moderately expansive clayey soils. However, due to the nature of the proposed development, these zones are not expected to adversely affect the Original Project and special considerations for expansive soils are not required.

Modified Project

Less Than Significant Impact. The Geotechnical Report prepared for the Modified Project confirms the conclusions of the 2007 IS/MND with respect to expansive soils. Based on the results of the Geotechnical Report, artificial fill was encountered in field explorations to a maximum depth of 9 feet below existing ground surface and generally consists of brown silty sand with gravel and sandy silt. The artificial fill is characterized as slightly moist and loose to dense or firm to stiff. The fill is likely the result of past construction and/or demolition activities at the site. Deeper fill may exist between excavations and in other portion of the Project Site that were not directly explored. Quaternary age alluvium was encountered beneath the fill material and generally consists of fine- to coarse-grained sand with varying amounts of silt, gravel and cobbles to a depth of approximately 26 to 28 feet beneath the existing ground surface. At this depth, a 3- to 8-foot thick silt layer was encountered in the boring that appears to be continuous across the Project Site. The upper few feet of soils encountered during the investigation are considered to

have a “very low” (EI=0) expansive potential and are classified as “non-expansive” based on the 2013 California Building Code (CBC) Section 1803.5.3. These soils are not considered expansive. With adherence to the City of Los Angeles Department of Building and Safety requirements pursuant to RC-GEO-1 (Seismic), impacts with respect to expansive soils would be less than significant.

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

Original Project

No Impact. The Project Site is located in a densely urbanized area extensively served by existing sewer infrastructure. The Original Project would not require the use of septic tanks or alternative wastewater disposal systems. Thus, similar to the Original Project, no impact associated with septic systems and alternative wastewater disposal would occur.

Modified Project

No Impact. This question would apply to the Modified Project only if it was located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems neither are necessary, nor are they proposed. Thus, similar to the Original Project, no impact associated with septic systems and alternative wastewater disposal would occur.

Cumulative Impacts

Less Than Significant Impact. Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Modified Project and any of the related projects. Similar to the Modified Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Modified Project’s geology and soils impacts concluded that, through the implementation of the mitigation measures recommended above, Modified Project impacts would be reduced to less than significant levels. Therefore, the Modified Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology and soil impacts would be less than significant.

VII. GREENHOUSE GAS EMISSIONS

Introduction

Greenhouse gas (GHG) emissions refer to a group of emissions that have the potential to trap heat in the atmosphere and consequently affect global climate conditions. Although there is disagreement as to the speed of global warming and the extent of the impacts attributable to human activities, it is widely

accepted in the scientific community that there is a direct link between increased emission of GHGs and long-term global temperature.

The principal GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H₂O). CO₂ is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e).

Thresholds of Significance

The *L.A. CEQA Thresholds Guide* does not provide any guidance as to how climate change issues are to be addressed in CEQA documents. Furthermore, neither the SCAQMD nor the State CEQA Guidelines Amendments provide any adopted thresholds of significance for addressing a mixed-use project's GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines Amendments provides guidance to lead agencies in determining the significance of the impacts of GHGs. Because the City of Los Angeles does not have an adopted quantitative threshold of significance for a mixed-use project's generation of greenhouse gas emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines.

As required in Section 15064.4 of the CEQA Guidelines, this analysis is based on a quantification of the Modified Project's GHG emissions using the CalEEMod software program. The CalEEMod software program was employed in this analysis because it is the CARB and SCAQMD's recommended platform for quantifying a project's construction and operational greenhouse gas emissions. CalEEMod utilizes widely accepted models for emission estimates combined with appropriate default data that can be used if site-specific information is not available. These models and default estimates use sources such as the United States Environmental Protection Agency (USEPA) AP-42 emission factors, California Air Resources Board (ARB) vehicle emission models, studies commissioned by California agencies such as the California Energy commission (CEC) and CalRecycle. Additionally, several of the mitigation measures described in CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* have been incorporated into CalEEMod.

In determining the significance of a project's greenhouse gas emissions, Guidelines Section 15064.4 states a lead agency "should consider," among other factors, "[t]he extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting" (id., subd. (b)(1)) and "[w]hether the project emissions exceed a threshold of significance that the lead agency determines applies to the project" (id., subd. (b)(2)). The Guidelines, however, do not mandate the use of absolute numerical thresholds to measure the significance of greenhouse gas emissions. Thus, for purposes of this analysis, determination on the significance of the Modified Project's impacts from GHG emissions is based on the extent to which the project would increase GHG emissions as compared to the existing environmental setting and the extent to which the Modified Project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. A significant impact would occur if the Modified Project is not substantially consistent

with the applicable policies and/or regulations outlined in the applicable state, regional and local planning policies and codes, including the Scoping Plan, SB 375, SCAG's 2012-2035 RTP/SCS, CALGreen and the LA Green Building Code.

Regulatory Setting

California Global Warming Solutions Act of 2006 (AB32)

The California Global Warming Solutions Act of 2006, widely known as AB 32, set a mandate for the California Air Resources Board (CARB) to develop and enforce regulations for the reporting and verification of statewide GHG emissions. The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020. In its Climate Change Scoping Plan (2008), ARB developed a California statewide GHG emission inventory for years 1990–2004 to support the effort of determining the 1990 level and 2020 near-term emissions limit. To determine the amount of GHG emission reductions needed to reduce to 1990 emissions, the ARB developed a forecast of 2020 emissions in a business-as-usual scenario (2020 BAU), which is an estimate of the emissions expected to occur in the year 2020 if none of the foreseeable measures included in the Scoping Plan were implemented.

In May 2014, CARB published the First Update to the Climate Change Scoping Plan, where it revised the previously adopted 1990 GHG emissions level from 427 MMTCO₂e to 431 MMTCO₂e based on the scientifically updated global warming potential (GWP) values in the Intergovernmental Panel on Climate Change's (IPCC's) Fourth Assessment Report.¹⁸ The total emissions expected in the 2020 BAU scenario were also updated from the previously adopted estimate of 596 MMTCO₂e to 509 MMTCO₂e. The updated 2020 BAU scenario includes reductions anticipated from Pavley I and the Renewable Electricity Standard which are now adopted into law. As shown in Table III-5, the State anticipates it would meet its 2020 GHG emissions limit of 431 MMTCO₂e through reductions in energy, transportation, waste and high-GWP sectors. The Cap-and-Trade Regulation provides a firm cap, ensuring that the 2020 statewide emission limit would not be exceeded.¹⁹ Thus, the estimated emission reductions attributed to the Cap-and-Trade Program depend on the emissions forecast. For example, if the emissions forecast increases, the reductions associated with the Cap-and- Trade Program would increase.

While the Scoping Plan does not provide any specific mandates or policies that directly apply to the mixed-use residential developments such as the Modified Project, statewide reductions in GHG emissions from new construction is being accomplished through stringent building code regulations and regional polices to address population growth and infrastructure needs. The local building codes and local and regional planning policies that are aimed in part at increasing energy efficiency and reducing greenhouse gas emissions and which are relevant to the Modified Project are addressed below.

¹⁸ *The IPCC is the leading international body for the scientific assessment of climate change established in 1988 under the auspices of the United Nations.*

¹⁹ *CARB, First Update to the Climate Change Scoping Plan, May 2014.*

**Table III-5
Climate Change Scoping Plan 2020 Emissions Target**

Category	2020 CO ₂ e Emissions (MMTOC ₂ e) ^[a]
AB 32 Baseline 2020 Forecast Emissions (2020 BAU)	509
Expected Reductions from Sector-Based Measures	
Energy	25
Transportation	23
High-GWP	5
Waste	2
Cap and Trade Reductions	23 ^[b]
2020 Limit	431
^[a] Based on AR4 GWP values. ^[b] Cap and Trade emissions reductions depend on the emission forecast. Source: CARB, First Update to the Climate Change Scoping Plan, May 2014.	

Sustainable Communities and Climate Protection Act (SB 375)

California's Sustainable Communities and Climate Protection Act, also referred to as Senate Bill (SB) 375, became effective January 1, 2009. The goal of SB 375 is to help achieve AB 32's GHG emissions reduction goals by aligning the planning processes for regional transportation, housing, and land use. SB 375 requires CARB to develop regional reduction targets for GHGs, and prompts the creation of regional plans to reduce emissions from vehicle use throughout the State. California's 18 Metropolitan Planning Organizations (MPOs) have been tasked with creating Sustainable Community Strategies (SCS) in an effort to reduce the region's vehicle miles traveled (VMT) in order to help meet AB 32 targets through integrated transportation, land use, housing and environmental planning. Pursuant to SB 375, CARB set per-capita GHG emissions reduction targets from passenger vehicles for each of the State's 18 MPOs. On September 23, 2010, CARB issued a regional eight (8) percent per capita reduction target for the planning year 2020, and a conditional target of 13 percent for 2035.

With respect to motor vehicles, page 48 of the 2008 Scoping Plan states that local governments will play a significant role in the regional planning process to reach passenger vehicle greenhouse gas emissions reduction targets. Local governments have the ability to directly influence both the siting and design of developments in a way that reduces greenhouse gases associated with vehicle travel, as well as energy, water, and waste. A partnership of local and regional agencies is needed to create a sustainable vision for the future that accommodates population growth in a carbon efficient way while meeting housing needs and other planning goals. Integration of the sustainable communities' strategies or alternative planning strategies with local general plans will be key to the achievement of these goals. State, regional, and local agencies must work together to prioritize and create the supporting policies, programs, incentives, guidance, and funding to assist local actions to help ensure regional targets are met. Enhanced public transit service combined with incentives for land use development that provides a better market for public

transit will play an important role in helping to reach regional targets. Thus, based on the above targets noted in the Scoping Plan, a new development Project that can demonstrate it directly influences both the siting and design of new developments in a way that reduces greenhouse gases associated with vehicle travel would be considered consistent with statewide GHG-reduction goals and policies, including AB 32, and does not make a cumulatively considerable contribution to global warming.

2012–2035 RTP/SCS

On April 4, 2012, the Regional Council of the Southern California Association of Governments (SCAG) adopted the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy: Towards a Sustainable Future (2012–2035 RTP/SCS). Within the RTP, the SCS demonstrates the region’s ability to attain and exceed the GHG emission-reduction targets set forth by CARB. The SCS sets forth a regional plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The regional vision of the SCS maximizes current voluntary local efforts that support the goals of SB 375, as evidenced by several Compass Blueprint Demonstration Projects and various county transportation improvements. The SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures. Finally, the 2012–2035 RTP/SCS fully integrates the two subregional SCSs prepared by the Gateway Cities and Orange County Council of Governments. On June 4, 2012, CARB accepted SCAG’s quantification of GHG emission reductions from the 2012–2035 RTP/SCS and the determination that the 2012–2035 RTP/SCS would, if implemented, achieve the 2020 and 2035 GHG emission reduction targets established by CARB.²⁰

SCAQMD

SCAQMD has released draft guidance regarding interim CEQA GHG significance thresholds. In October 2008, SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 metric tons of CO₂e per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where SCAQMD is lead agency. However, SCAQMD has yet to formally adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds.

CALGreen Code

Originally adopted in 2008, the California Green Building Standards (CALGreen) Code included all voluntary standards that went beyond the basic building code requirements and introduced new standards

²⁰ CARB Executive Order G-12-039.

for reducing water use, provisions for reducing and recycling construction and demolition waste, criteria for site development to locate buildings near public transit, and measures for improving indoor air quality to protect the health of building occupants. In 2010, the CALGreen Code became mandatory on a statewide basis. For the 2013 Code, effective January 2014, the scope of the CALGreen Code was expanded to all residential buildings, including high-rise residential, as well as to additions or alterations with increases in conditioned space.

LA Green Plan

The City is addressing the issue of global climate change through implementation of the Green LA, An Action Plan to Lead the Nation in Fighting Global Warming (LA Green Plan), which outlines the goals and actions that the City has established to reduce the generation and emission of GHGs from public and private activities. According to the LA Green Plan, the City is committed to the goal of reducing emissions of CO₂ to 35 percent below 1990 levels by the year 2030. To achieve this goal, the City is increasing the generation of renewable energy, improving energy conservation and efficiency, and changing transportation and land use patterns to reduce dependence on automobiles.

LA Green Building Code

The City of Los Angeles *L.A. Green Building Code* (Ordinance No. 181480), which incorporates applicable provisions of the CALGreen Code and in many cases outlines more stringent GHG reduction measures available to development projects in the City of Los Angeles is consistent with statewide goals and policies in place for the reduction of greenhouse gas emissions, including AB 32 and the corresponding Scoping Plan. Among the many GHG reduction measures outlined later in this Section, the *L.A. Green Building Code* requires new development projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy Commission on December 17, 2008, and meet 50 percent construction waste recycling levels. New development projects are required to comply with the *L.A. Green Building Code*, and therefore are generally considered consistent with statewide GHG-reduction goals and policies, including AB 32. A Project that requests variances or deviations from the *L.A. Green Building Code* that creates the potential to result in increased GHG emissions as a result of the specific requests would not be considered consistent with the *L.A. Green Building Code*.

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

Original Project

At the time the 2007 IS/MND was adopted, there were no requirements under CEQA or the State CEQA Guidelines specifically addressing a project's impact upon global warming or greenhouse gas emissions (GHG). As such, the 2007 IS/MND did not include an analysis or assessment of the Original Project's GHGs.

Modified Project

Less Than Significant Impact. The Modified Project's construction and operational GHG emissions would be less than significant on a project specific and cumulative level. The analysis for both construction and operational impacts is provided below.

Construction

Similar to the Original Project, construction activities for the Modified Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and vehicle trips generated by construction workers traveling to and from the Project Site. These impacts would vary on a daily basis throughout the duration of construction activities.

Emissions of GHGs for the Modified Project were calculated using CalEEMod for each year of construction. The results of this analysis are presented in Table III-6, Modified Project Construction-Related Greenhouse Gas Emissions. As shown in Table III-6, the total GHG emissions from construction activities related to the Modified Project would be 1,034 metric tons with the greatest annual emissions of 639 metric tons occurring in 2017. In the absence of any adopted quantifiable thresholds of significance, the determination of construction emissions is therefore based on whether the Modified Project would be consistent with applicable polices and/or best management practices aimed at achieving GHG reduction targets. Construction of the Modified Project would involve the demolition and removal of an asphalt-based surface parking lot and the construction of the proposed structure. Consistent with the L.A. Green Building Code Sec. 99.04.408 and LAMC Sec. 66.32, the demolition debris will be required to be transported to a City-certified construction and demolition waste processing facility. Compliance with this regulation is consistent with the goals and policies of the LA Green Plan and the LA Green Building Code.

**Table III-6
Project Construction-Related Greenhouse Gas Emissions**

Year	CO₂e Emissions (Metric Tons per Year) ^a
2016	91
2017	639
2018	304
Total Construction GHG Emissions	1,034
^a Construction CO ₂ values were derived using CalEEMod Version 2013.2.2 See Appendix C, Greenhouse Gas Emissions Calculations Worksheets.	

Operation

Existing Project Site GHG Emissions

The Project Site is currently improved with a surface parking lot that provides general parking for other land uses in the surrounding area. The vehicle trips associated with the vehicles that park on-site are not generated by on-site land uses and may or may not occur even if the Project Site were to cease operations as a surface parking lot. As such, the GHG emissions attributable to the existing use on the Project Site are assumed to be zero. However, it is worth noting that there is an approved entitlement for the Project Site that would permit the development of a new mixed-use development consisting of 158 joint live/work condominium units in a 21-story structure, with two subterranean parking level and 7 commercial condominium units with 5,780 square feet of ground floor retail, which would result in additional GHG emissions for construction and operation (VTT 66505 and ZA-2006-6350-YZ-ZAA-SPR).

Operational GHG Emissions

The GHG emissions resulting from operation of the Proposed Project, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment and generation of solid waste and wastewater, were calculated under two separate scenarios in order to illustrate the effectiveness of the Project's compliance with the applicable plans and policies that have been adopted for the purposes of reducing GHG Emissions from development projects, and Project Design Features (PDF) that would further serve to reduce GHG emissions, such as the project being an infill development replacing a surface parking lot, and increasing density within a High Priority Transit Area. For purposes of demonstrating the Proposed Project's consistency with the intent of AB32 and the State's goals for reducing GHG emissions to 1990 levels by 2020, the Modified Project's GHG emissions were generated under two scenarios: (a) Proposed Project Without GHG Reduction Features and (b) Proposed Project With GHG Reduction Features. The "With GHG Reduction Features" scenario reflects the Modified Project's design features such as being an infill development with applicable trip credits for increased density, walkability, transit accessibility, incorporating Energy Star rated-appliances in the dwelling units, designing the dwelling units without fireplaces, application of low VOC content architectural coatings, increasing energy conservation beyond Title 24, and implementing on-site solid waste recycling program. Furthermore, the "With GHG Reduction Features" scenario reflects the Project's VMT reduction attributable to providing high-density residential housing within in a High Priority Transit Area and a major employment center. These project characteristics are substantially consistent with the intent of state, regional and local plans and policies such as AB32, SB375, SCAG's 2012-2035 RTP/SCS growth strategy, the LA Green Plan, and the LA Green Building Code, which have been adopted for the purposes of reducing greenhouse gas emissions. These design features are inherently incorporated into the Project by design (see PDF GHG-1 through PDF GHG-3, below) or are otherwise requisite requirements that will be verified during Site Plan review and upon issuance of applicable building permits. The "Without GHG Reduction Features" scenario reflects a multi-family residential /retail project of similar size and scale built to Title 24 standards but without any of the GHG reduction features or sustainability features as

described above. This scenario is provided for informational purposes and is not intended to be used as a basis for establishing a quantitative threshold of significance.

As shown in Table III-7, below, the net increase in GHG emissions generated by the Proposed Project under the Project Without GHG Reduction Features would be 5,017 CO₂e MTY. The Project With GHG Reduction Features scenario would result in a net increase of 4,132 CO₂e MTY. For purposes of this comparison it should be noted that the Project’s structural and operational design features such as installing energy efficient lighting, low flow plumbing fixtures, Energy Star-rated appliances, and implementing a construction and operational recycling program during the life of the project would reduce the Modified Project’s GHG emissions by 885 CO₂e MTY (or approximately 18 percent).

Through required implementation of the L.A. Green Building Code, the Project’s mixed-use design, and the Project’s location on an infill site within ½ mile of a regional transit station, the Modified Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs in furtherance of CARB’s AB 32 Scoping Plan aimed at achieving 1990 GHG emission levels by 2020. Therefore, the Project’s generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to GHG emissions, and impacts would be less than significant.

**Table III-7
Project Operational Greenhouse Gas Emissions**

Emissions Source	Estimated Project Generated CO ₂ e Emissions (Metric Tons per Year)		
	Project Without GHG Reduction Features	Project With GHG Reduction Features	Percent Reduction
Area	5	5	0%
Energy	1,409	1,221	13%
Waste	84	42	50%
Water	259	223	17%
Mobile (Motor Vehicles)	3,207	2,598	19%
Construction Emissions ^a	43	43	0%
Project Total	5,017	4,132	18%

^a The total construction GHG emissions were amortized over 30 years and added to the operation of the Project. Calculation data and results provided in Appendix C, Greenhouse Gas Emissions Calculations Worksheets.

Project Design Features:

Specific Project Design Features (PDFs) proposed to reduce the project’s GHG emissions are presented as follows:

PDF-GHG-1: The project would install energy efficient lighting, low flow plumbing fixtures, Energy Star-rated appliances, and implement a construction and operational recycling program.

PDF-GHG-1: Low- and non-VOC containing paints, sealants, adhesives, solvents, asphalt primer, and

architectural coatings (where used), or pre-fabricated architectural panels shall be used in the construction of the Project to reduce VOC emissions to the maximum extent practicable.

PDF-GHG-3: Any new construction shall include 20 percent of parking spaces set aside for EV ready parking.

Project Impacts

As stated above, a significant impact would occur if the Proposed Project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The Proposed Project would comply with the City of Los Angeles' Green Building Ordinance standards that reduce GHG emissions, and are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the State's codes. The Proposed Project would incorporate several measures and design elements that serve to reduce the Modified Project's GHG emissions. Specifically the Modified Project's GHG reduction features are identified as follows:

1. Infill Development. The Modified Project is located on an infill site that is currently developed with surface parking lot land uses and that is located within a transit priority area. The Modified Project is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development. (See Section II, Project Description for further details.)

2. GHG Emissions Associated with Energy Demand. As mandated by the *L.A. Green Building Code*, the Modified Project would be required to exceed Title 24 2013 standards and include ENERGY STAR appliances. (See PDF-GHG-1, above.)

3. GHG Emissions Associated with Solid Waste Generation. The Modified Project is subject to construction waste reduction of at least 50 percent. In addition, operation of the Modified Project would be subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. As required by the California Solid Waste Reuse and Recycling Access Act of 1991, the Project would provide adequate storage areas for collection and storage of recyclable waste materials. (See RC-SW-1 in Section XVII (f), Utilities and Service Systems)

4. GHG Emissions Associated with Water Use. The Modified Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent based on the maximum allowable water use per plumbing fixture and fitting as required by the California Building Standards Code. The 20 percent reduction in potable water use shall be demonstrated by one of the following methods:

1. Each plumbing fixture and fitting shall meet reduced flow rates specified in California Building Code Table 4.303.2; or

2. A calculation demonstrating a 20 percent reduction in the building “water use” baseline as established in California Building Code Table 4.303.1 shall be provided. The Project must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants’ needs.

In addition to the GHG emission reductions described above, it is important to note that the CO2 estimates from mobile sources (particularly CO2, CH4, and N2O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing conditions. This is a standard approach taken for air quality analyses and in many cases, is appropriate because of the complexity involved in determining whether emissions generated by a project are new emissions sources, or whether they are sources that were already in the air basin and just shifted to a new location. Because the effects of GHGs are global, a project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels. For example, if a substantial portion of California’s population migrated from the South Coast Air Basin to the San Joaquin Valley Air Basin, this would likely decrease GHG emissions in the South Coast Air Basin and increase emissions in the San Joaquin Valley Air Basin, but little change in overall global GHG emissions. However, if a person moves from one location where the land use pattern requires extensive auto use (commuting, shopping, etc.) to a new development that promotes shorter and fewer vehicle trips, more walking, and overall less energy usage, then the new development would result in a potential net reduction in global GHG emissions.

Consistency with AB 32 Scoping Plan

With respect to demonstrating the Modified Project’s consistency with the Scoping Plan, it should be noted that the Scoping Plan is a statewide planning document that addresses GHG emissions from a multiple sources and sectors throughout the State of California and is not intended to address impacts from individual development projects. While the Scoping Plan addresses planning and development as a sector, it does not provide any specific policies or goals that are directly applicable to individual development projects. That said, there are several broader policies identified within the Scoping Plan that are indirectly applicable to the proposed development. The Project’s consistency with these broader planning measures is discussed below.

Consistency with Applicable AB 32 Scoping Plan Measures

<p>Energy Efficiency. Maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.</p>	<p>Consistent. The Project would be designed and constructed to meet LA Green Building Code standards by including several measures designed to reduce energy consumption.</p>
<p>Renewables Portfolio Standard. Achieve 33 percent renewable energy mix statewide.</p>	<p>Consistent. The Project would use energy from the Los Angeles Department of Water and Power (LADWP), which has goals to diversify its portfolio of energy sources to increase the use of renewable energy.</p>

<p>Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California’s new and existing inventory of buildings.</p>	<p>Consistent. The Project would be designed and constructed to meet Cal Green building standards and will include several measures designed to reduce energy consumption.</p>
<p>Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling. Move toward zero waste.</p>	<p>Consistent. The Project would result in a less than significant impact on landfill capacity. (see response to Checklist Question 17(f), below)</p>
<p>Water. Continue efficiency programs and use cleaner energy sources to move and treat water.</p>	<p>Consistent. The Project would use water-efficient landscaping including point-to-point irrigation and a smart controller drip system to reduce water use.</p>
<p><i>Measures not listed are not applicable to this project. Source: Parker Environmental Consultants</i></p>	

Consistency with SB 375

California SB 375 requires integration of planning processes for transportation, land-use and housing. Under the bill, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet the target provided in the Scoping Plan, created by CARB, for reducing GHG emissions. SB 375 requires SCAG to direct the development of the SCS for the region. A discussion of the Project’s consistency with the SCS is provided further below.

Consistency with 2012-2035 RTP/SCS

The Project would be consistent with the following key GHG reduction strategies in SCAG’s 2012-2035 RTP/SCS, which are based on changing the region’s land use and travel patterns:

- Compact growth in areas accessible to transit;
- More multi-family housing;
- Jobs and housing closer to transit;
- New housing and job growth focused in High Quality Transit Areas (HQTA); and
- Biking and walking infrastructure to improve active transportation options, transit access.

The Project represents an infill development within an existing urbanized area that would concentrate new residential and neighborhood serving commercial uses within a High Quality Transit Area (HQTA), the 2012-2035 RTP/SCS defines as generally walkable transit villages or corridors that are within 0.5-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The Project Site is an infill site within a Transit Priority Area as defined by CEQA. It is located within ½ mile of two existing rail transit stations, the 7th Street Metro rail transit station, and the Pershing Square Metro rail transit station. The Project Site is also located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. In addition, the Project would also provide bicycle storage areas for Project residents and guests. The Project would provide residents and

visitors with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in vehicle miles traveled and related vehicular GHG emissions. These and other measures would further promote a reduction in vehicle miles traveled and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2012–2035 RTP/SCS.

Consistency with L.A. Green Building Code

The Los Angeles Green Building Ordinance requires that all projects filed on or after January 1, 2014, must comply with the L.A. Green Building Code. Mandatory measures under the L.A. Green Building Code that would help reduce GHG emissions include short and long term bicycle parking measures; designated parking measure; and electric vehicle supply wiring. The Modified Project would comply with these mandatory measures as the Project would provide 34 short-term bicycle parking spaces and 308 long-term bicycle parking spaces; and would include Electric Vehicle (EV) Charging Stations at a minimum number of equal to ten percent of the total number of parking spaces, pursuant to the LA Green Building Code. Furthermore, the LA Green Building Code includes elective measures that would increase energy efficiency of the Project. The Project would include various elective measures including, but not limited to, installing Energy Star rated appliances, installation of a submeter, and installation of water-conserving fixtures. Therefore, the Project is consistent with the L.A. Green Building Code.

Cumulative Impacts

An individual project's GHG emissions typically would be relatively very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change, which can cause the adverse environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions determines whether a project's contribution to global climate change is "cumulatively considerable." Many regulatory agencies, including the SCAQMD, concur that GHG and climate change should be evaluated as a potentially significant cumulative impact, rather than a project direct impact. Accordingly, the GHG analysis presented in this Section analyzes whether the Proposed Project would be cumulatively considerable using a plan-based approach (supported by quantitative and qualitative analysis) to determine the projects' contributing effect on climate change.

As shown in Table III-7, above, the net increase in GHG emissions generated by the Modified Project would be 5,017 CO₂e MTY. The Project's compliance with the applicable plans, policies and codes that have been adopted for purposes of reducing GHG emissions in furtherance of the statewide goals established in AB 32 and the 2012-20135 RTP-SCS, have been demonstrated to reduce the Modified Project's GHG emissions by 885 CO₂e MTY (or approximately 18 percent). Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, it is speculative to identify the specific cumulative impact, if any, to global climate change from one project's incremental increase in global greenhouse gas emissions. The Project's greenhouse gas emissions and the resulting level of significance is therefore appropriately assessed in terms of whether the Modified Project is substantially consistent with the applicable policies and/or regulations outlined in the applicable state, regional and

local planning policies and codes, including the Scoping Plan, SB 375, SCAG's 2012-2035 RTP/SCS, CALGreen and the LA Green Building Code. Because the Modified Project is substantially consistent with the applicable policies and/or regulations set in place to achieve CARB's goal of reducing emissions to 1990 levels by 2020, the Project's GHG emissions would not be cumulatively considerable and cumulative impacts would be considered less than significant.

Conclusion

Through required implementation of the L.A. Green Building Code, the Project's mixed-use design, and the Project's proximity to transit, the Proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including CARB's AB 32 Scoping Plan aimed at achieving 1990 GHG emission levels by 2020, SB 375, the 2012-2035 RTP/SCS, the LA Green Plan, and the LA Green Building Code. While the Modified Project's emissions would be greater than the Original Project as a direct result of increasing the density on the Project Site, this increase is consistent with the planning policies of SB 375 and the 2012-2035 RTP/SCS to increase density in High Priority Transit Areas, which will have a net reduction in GHG emissions per capita as compared to the Original Project. Therefore, the Proposed Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to GHG emissions, and the Modified Project's impacts upon global warming and climate change would be less than significant.

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

Original Project

As discussed above in Checklist Question VII 9(a), the requirement to address greenhouse gas emissions in CEQA documents was not initiated until 2010, three years after the 2007 IS/MND was adopted. As such the 2007 IS/MND did not include an analysis or assessment of the Original Project's GHG emissions.

Modified Project

Less than Significant Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if the Proposed Project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. As discussed in response to Checklist Question VII(a), above, the Modified Project is substantially consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including CARB's AB 32 Scoping Plan, SB 375, the 2012-2035 RTP/SCS, the LA Green Plan, and the LA Green Building Code. Therefore, the Modified Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases and, the Proposed Project's individual and cumulative impact would be less than significant.

VIII. HAZARDS AND HAZARDOUS MATERIALS

The following section summarizes and incorporates the reference information from the Phase One Environmental Site Assessment Report prepared by FREY Environmental, Inc. (“FREY”): Phase I Environmental Site Assessment 850 South Hill Street Los Angeles, California (APN 5144-017-037), dated February 27, 2015 (“Phase I ESA”). The Project Phase I ESA is included as Appendix D of this Addendum. The Environmental Site Assessment and Methane Investigation for the Original Project is included in Appendix F and G of the 2007 IS/MND, respectively.

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

Original Project

Less Than Significant Impact. Construction of the Original Project would involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all hazardous materials would be contained, stored, and used in accordance with manufacturers’ instructions and handled in compliance with applicable standards and regulations. Operation of the Original Project would involve the limited use and storage of common hazardous substances typical of those used in multi-family residential developments. No industrial 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. Therefore, the impact of the Original Project relative to the transport, use, or disposal of hazardous materials use would be less than significant.

Modified Project

Less Than Significant Impact. Similar to the Original Project, the Modified Project would not result in the routine transport, use, or disposal of hazardous materials. No hazardous materials other than the modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Site, and the use of these substances would comply with State Health Codes and Regulations. Therefore, the Modified Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

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

A significant impact may occur if a project utilizes quantities of hazardous materials as part of its routine operations and could potentially pose a hazard to nearby sensitive receptors under accident or upset conditions.

Original Project

Potentially Significant Impact Unless Mitigation Incorporated. The Phase I ESA that was prepared for the Original Project reviewed records of the Los Angeles Fire Department (LAFD), which did not reveal any manufacturing or use of petrochemicals at the Project Site, and there are no records of violations for the storage of hazardous materials with the LAFD. Similarly, there are no records of hazardous waste generation or storage on the site with the LAFD. Hazardous wastes were not observed during that site inspection and there is no historical evidence of hazardous waste generation.

The site-specific Environmental Resources Report search performed for the Original Project found no recorded sites that may have impacted the Project Site based on hydraulic gradient, site distance, regulatory status or contamination magnitude considerations, and the Project Site itself was not identified on any of the agency databases. The Methane Investigation prepared for the Original Project noted the absence of detectible concentrations of methane and the corresponding low gas pressures. The Project Site should be classified as a Level I site with a design methane pressure of ≤ 2 inches of water in accordance Los Angeles Department of Building and Safety (LADBS) guidelines. Air monitoring would be conducted during all subsurface construction activities. Should potentially dangerous levels of methane be encountered during construction, appropriate safety measures would be followed. With the implementation of applicable regulations presented below as mitigation measures, the potential methane hazard would be reduced to a less than significant level and Original Project would have a less than significant impact in relation to any foreseeable releases of hazardous materials into the environment.

Mitigation Measures:

34. **Sub-slab Vent System.** A series of perforated vent lines and an associated 2-inch thick gravel blanket must be installed beneath the floor slab of the proposed structure. The perforated vent lines must be connected to solid vent piping that extends through the walls or pipe chases of the building to outlets above the roof line. A permanent dewatering system must be installed if the design high groundwater level for the project is not at least one foot below the lowest vent piping elevation. Groundwater was not encountered during the current site investigation to the maximum depth explored (i.e., 40 feet). The project soils engineer should identify the design groundwater elevation in accordance with LADBS criteria.
35. **Impervious Membrane.** A continuous gas membrane is required below the floor slab of the building. This membrane must be sealed against footing, pilings and utilities to form a gas-tight barrier beneath the building.
36. **Utility Trench Dams.** A section of impervious backfill consisting of compacted native soil or sand/cement slurry must be installed in utility trenches that extend beneath the perimeter of the building in order to prevent gas from migrating through sand or backfill.
37. **Conduit Seals.** Gas tight seals must be installed on all conduits (e.g., electrical, cable, T.V., telephone, etc.) that extend to the interior of the structure. The purpose of these seals is to prevent

methane gas from entering the subsurface cracks or discontinuities in the conduits and subsequently migrating to the interior of the building.

Modified Project

Potentially Significant Impact Unless Mitigation Incorporated. Historic information indicates that the Project Site was used for single and multi-family residential housing from 1888 to 1912. In the 1910s several of the Project Site lots were developed with multi-story retail stores, office spaces and hotels, including a three story building at 846 S. Hill Street and a six-story building with a basement at 850 S. Hill Street. In the 1930s, the northern portion of the Project Site was cleared for automobile parking and a fruit stand. In 1944, the six-story building was altered for garment manufacturing. In 1988, the Project Site was converted into the parking lot that is currently operating. Accordingly, the three-story building and the six-story building located on the Project Site were demolished and the basement of the six-story building was backfilled.

Three on-site RECs have been noted in the Phase I ESA. One of the RECs was the grading permit issued to backfill the basement at 850 South Hill Street. There is a high likelihood that undocumented soil was used to backfill the basement. Since the grading operation was inspected by the City of Los Angeles there is a very low likelihood that soil with volatile hydrocarbons would have been used as backfill material. The others REC include a 1950 boiler stack alteration permit for 221 West 9th Street and an Industrial Waste permit for “boiler blowdown” for 850 South Hill Street. The fueling of boilers with heating oil would not present a vapor encroachment condition based on the low volatility of heating oil. A vapor encroachment condition from a heating oil release is considered a very low likelihood.

A total of 30 off-site facilities were listed as potential RECs within a 1/8-mile radius from the Project Site in government databases. None of the 30 facilities were listed as having an unauthorized release. As discussed in the Geotechnical Report (See Appendix B of this IS/MND Addendum), groundwater is suspected to occur at approximately 130 feet bgs beneath the Project Site. Based on groundwater being greater than 100 feet bgs beneath the Project Site, potential hazards with respect to the release of hazardous materials would be less than significant.

According to Phase I ESA prepared for the Modified Project, and consistent with the findings of the Original Project, the Project Site is located within a City of Los Angeles Methane Buffer Zone. Although the Project Site is located in a City-designated Methane Zone, FREY reviewed the California Division of Oil, Gas and Geothermal (CADOGG) Resources Well Finder Website for oil wells in the vicinity of the Site. No oil wells were located within 1,500 feet from the Project Site. Based on the distance from the Project Site, oil wells are not considered to be a Recognized Environmental Condition (“REC”) (CADOGG, 2015). Similar to the Original Project, the Modified Project would be required to implement Mitigation Measures 34 through 37 of the Original Project, which would reduce any potential impacts relating to the accidental release of methane to a less than significant level. In addition, the Modified Project would be required to implement Regulatory Compliance Measure RC-HAZ-1 to ensure compliance with the LADBS Methane Mitigation Standards.

Mitigation Measures:

34. **Sub-slab Vent System.** A series of perforated vent lines and an associated 2-inch thick gravel blanket must be installed beneath the floor slab of the proposed structure. The perforated vent lines must be connected to solid vent piping that extends through the walls or pipe chases of the building to outlets above the roof line. A permanent dewatering system must be installed if the design high groundwater level for the project is not at least one foot below the lowest vent piping elevation. Groundwater was not encountered during the current site investigation to the maximum depth explored (i.e., 40 feet). The project soils engineer should identify the design groundwater elevation in accordance with LADBS criteria.
35. **Impervious Membrane.** A continuous gas membrane is required below the floor slab of the building. This membrane must be sealed against footing, pilings and utilities to form a gas-tight barrier beneath the building.
36. **Utility Trench Dams.** A section of impervious backfill consisting of compacted native soil or sand/cement slurry must be installed in utility trenches that extend beneath the perimeter of the building in order to prevent gas from migrating through sand or backfill.
37. **Conduit Seals.** Gas tight seals must be installed on all conduits (e.g., electrical, cable, T.V., telephone, etc.) that extend to the interior of the structure. The purpose of these seals is to prevent methane gas from entering the subsurface cracks or discontinuities in the conduits and subsequently migrating to the interior of the building.

Regulatory Compliance Measures:

RC-HAZ-1 Explosion/Release: Prior to the issuance of a building permit the Project Site shall be independently analyzed by a qualified engineer, as defined in Ordinance No. 175,790 and Section 91.7102 of the LAMC, hired by the Project Applicant. The engineer shall investigate and design a methane mitigation system in compliance with the LADBS Methane Mitigation Standards for the appropriate Site Design Level which would prevent or retard potential methane gas seepage into the building. The Applicant shall implement the engineer's design recommendations subject to CA DOGGR, LADBS and LAFD plan review and approval.

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

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) the project involved the creation of any health hazard or potential health hazard. The determination of significance shall be made on a case-by-case basis considering the following factors: (a)

the regulatory framework for the health hazard; (b) the probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; (c) the degree to which project design would reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance; (d) the probable frequency and severity of consequences to people from exposure to the health hazard; and (e) the degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.

Original Project

Less Than Significant Impact. The Original Project does not involve any demolition of structures that could release asbestos or lead based paint contaminants. No public or private K-12 schools are located within one-quarter mile of the Project Site. Additionally, the accidental release of hazardous materials, substances, or wastes is not reasonably anticipated during the construction or operation of the Original Project. As such, no significant exposure of any existing or proposed school within one-quarter mile of the Project Site is reasonably expected and impacts would be less than significant.

Modified Project

Less Than Significant Impact. The closest Los Angeles Unified School District School to the Project Site is 9th Street Elementary, which is located approximately 0.9 mile southeast of the Project Site. Similar to the Original Project, no hazardous materials other than the modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would be present at the Project Site and use of these substances would comply with State Health Codes and Regulations. Furthermore, the proposed haul route would extend from the Project Site to the 8th Street freeway onramp to the 110 Freeway, which would not pass by the aforementioned school. Therefore, the Modified Project would not create a significant hazard through hazardous emissions or the handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school and a less than significant impact would occur.

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

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

Original Project

Less than Significant Impact. The Project Site is not identified on any regulatory hazardous materials sites. Consequently, the impact of the Original Project to such a site that could create a significant hazard to the public or the environment would be less than significant.

Modified Project

Less than Significant Impact. Based on the data contained in the Phase I ESA, FREY concluded the Project Site was not listed in any government database reviewed by EDR. Therefore, similar to the Original Project, development of the Modified Project would not create a significant hazard to the public or the environment.

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

A significant project-related impact may occur if the Modified Project were placed within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard.

Original Project

No Impact. The Project Site is not located within an airport land use plan area or within two miles of an airport. In addition, the Project Site is not located within an airport hazard area as designated by the City of Los Angeles. The Original Project would not result in airport-related safety hazards for people residing or working in the area. Therefore, the Original Project would have no impact in relation to airport activity.

Modified Project

No Impact. The closest public airport to the Project Site is the Los Angeles International Airport (LAX). However, the airport is not located within two miles of the Project Site. Furthermore, the Project Site is not in an airport hazard area. Therefore, no impact would occur.

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

Original Project

No Impact. The Project Site is not located within the vicinity of a private airstrip. Construction and operation of the Original Project would not result in airstrip-related safety hazards for people residing or working in the area. Therefore, no impact in relation to airstrip activity would occur.

Modified Project

No Impact. This question would apply to the Modified Project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The Project Site is not located within the vicinity of a private airstrip and therefore, no impact would occur.

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

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact if: (a) the project involved possible interference with an emergency response plan or emergency evacuation plan. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the degree to which the project may require a new, or interfere with an existing emergency response or evacuation plan, and the severity of the consequences.

Original Project

Potentially Significant Impact Unless Mitigation Incorporated. With respect to Hill Street and 9th Street, the 2007 IS/MND concluded that any lane closures, movement of heavy construction equipment, or any construction in, or use of, the -of-way would be coordinated with the Police and Fire Departments and LADOT. Either roadway would remain unimpeded through the use of flagmen and other controls, as may be required by conditions of the issuance of the Department of Public Works. Therefore, with implementation of the mitigation measures listed below, the construction and operation of the Original Project would have a less than significant impact on the implementation of the City's emergency response and evacuation plan.

Mitigation Measures:

38. The Homeowners Association shall develop and implement an Emergency Procedures Plan, which includes notification to the City of Los Angeles EOO, the Central Division of the Los Angeles Police Department, Los Angeles Fire Department Central Division Headquarters, and Fire Station No. 10 (first call station) of any full or partial lane closures, movement of heavy construction equipment, construction within the 9th Street or Hill Street right-of-ways, or any use of the adjacent right-of-ways.
39. The Emergency Procedures Plan shall specify a process by which any activities in the adjacent right-of-ways shall be coordinated with the emergency requirements of the EOO and the Police and Fire Departments.

Modified Project

Potentially Significant Impact Unless Mitigation Incorporated. The Project Site is not located on an identified disaster route or an adopted emergency response or evacuation plan.^{21,22} Development of the Project Site may require temporary and/or partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Modified Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access or travel upon public rights-of-way. Furthermore, Project Design Feature PDF-TRAFFIC-1, as discussed in Section XVI (a), requires that a construction work site traffic control plan be submitted to the Department of Transportation (DOT) for review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. Haul trips would occur outside of the peak hours. The Modified Project's construction trip traffic would be a fraction of the operational traffic and it is not anticipated to contribute to a significant increase in the overall congestion in the Project vicinity. Furthermore, with implementation of Mitigation Measures 38 and 39 of the Original Project, the Modified Project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and no significant impacts would occur. As the Modified Project includes apartments units, compared to condominium units as proposed by the Original

Project, Mitigation Measure 38 has been updated so that the Applicant, rather than a Homeowners Association, shall be responsible for developing and implementing an Emergency Procedures Plan.

Mitigation Measures:

38. The ~~Homeowners Association~~ Applicant shall develop and implement an Emergency Procedures Plan, which includes notification to the City of Los Angeles EOO, the Central Division of the Los Angeles Police Department, Los Angeles Fire Department Central Division Headquarters, and Fire Station No. 10 (first call station) of any full or partial lane closures, movement of heavy construction equipment, construction within the 9th Street or Hill Street right-of-ways, or any use of the adjacent right-of-ways.
39. The Emergency Procedures Plan shall specify a process by which any activities in the adjacent right-of-ways shall be coordinated with the emergency requirements of the EOO and the Police and Fire Departments.

²¹ *Los Angeles County Department of Public Works, City of Los Angeles Central Area Disaster Route Map, August 13, 2008.*

²² *City of Los Angeles, Safety Element Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, April 1995.*

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

Original Project

No Impact. No wildlands are within several miles of the Project Site. According to the City of Los Angeles Safety Element, Selected Wildfire Hazard Areas, the Project Site is not located near any potential wildland fire areas. Therefore, no impact in relation to exposure of persons and property to wildfire would occur.

Modified Project

No Impact. The Project Site is located in a highly urbanized area of Downtown Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. Consistent with the findings of the 2007 IS/MND, the Project Site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).²³ Therefore, no impacts from wildland fires are expected to occur.

Cumulative Impacts

Less Than Significant Impact. Development of the Modified Project in combination with the 84 related projects has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City of Los Angeles. However, the potential impact associated with the Modified Project would be less than significant and, therefore, not cumulatively considerable. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of those properties. Further, local municipalities are required to follow local, state, and federal laws regarding hazardous materials, which would further reduce impacts associated with the related projects. Therefore, with compliance with local, state, and federal laws pertaining to hazardous materials, the Modified Project in conjunction with related projects would be expected to result in less-than-significant cumulative impacts with respect to hazardous materials.

IX. HYDROLOGY AND WATER QUALITY

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

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge

²³ *City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, August 28, 2015, website: www.zimas.lacity.org.*

Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving body of water. A significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB) through its nine Regional Boards.

Original Project

Potentially Significant Unless Mitigation Incorporated. During operation of the Original Project, a Standard Urban Stormwater Mitigation Plan (SUSMP) must be implemented for developments of ten or more dwelling units. The Original Project would comply with all of the requirements set forth in the City's the NPDES Development Planning Program and would incorporate appropriate Best Management Practices (BMPs) that are designed to reduce the potential pollutants of concern in the Project's surface water runoff. Compliance with the requirements of the NPDES Permit and the SUSMP would ensure that the construction or operation of the Original project would not violate any water quality or waste discharge requirements. The following Mitigation Measures are recommended to ensure compliance with applicable regulations.

Mitigation Measures:

40. The project shall comply with the requirements of the NPDES permit for stormwater discharge and with all applicable requirements of the RWQCB, USEPA and local agencies regarding water quality.
41. The project shall implement stormwater BMPs to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard shall be provided.
42. All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as "NO DUMPING-DRAINS TO OCEAN") and/or graphical icons to discourage illegal dumping.
43. The legibility of signs and stencils discouraging illegal dumping shall be maintained.
44. Materials used on site with the potential to contaminate stormwater shall be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs.
45. The Homeowners Association shall prepare and execute a covenant and agreement (Department of City Planning General form (CP-6770)) satisfactory to the Department of City Planning

binding the owners to post-construction maintenance of all structural BMPs in accordance with the SUSMP.

Modified Project

Potentially Significant Unless Mitigation Incorporated. The Project Site lies within the Los Angeles RWQCB. Applicable regulations include compliance with the SUSMP and the Stormwater Low Impact Development (LID) Ordinance (No. 181899) requirements to reduce potential water quality impacts.

Construction

Similar to the Original Project, three general sources of potential short-term, construction-related stormwater pollution associated with the Modified Project include: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment. As required under the NPDES, the Project Applicants are responsible for preparing a Storm Water Pollution Prevention Plan (SWPPP) to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. The primary objectives of the NPDES stormwater program requirements are to: 1) effectively prohibit non-stormwater discharges; and 2) reduce the discharge of pollutants from stormwater conveyance systems to the Maximum Extent Practicable (“MEP” statutory standard). The SWPPP would incorporate the required implementation of BMPs for erosion control and other measures to meet the NPDES requirements for stormwater quality. Implementation of Mitigation Measures 40 through 45 of the Original Project, which have been included in this Addendum, and Regulatory Compliance Measure RC-WQ-1, would ensure that the construction of the Modified Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality and the Modified Project’s construction-related water quality impacts would be less than significant. Mitigation Measure 45 has been updated to reflect that the Applicant, rather than the Homeowners Association, shall prepare and execute a covenant and agreement for the maintenance of all structural BMPs in accordance with the SUSMP, as the Modified Project is proposing apartments units, rather than condominium units, as compared to the Original Project.

Operation

Currently there is an area drain located in the southwest corner of the Project Site, as well as an existing trench drain located at the gate of the entrance/exist off 9th Street. Any stormwater runoff that does not drain to either of these sheet flows west to S. Hill Street. The stormwater runoff that sheet flows to the west onto South Hill Street is carried within the street gutter until reaching an existing catch basin at the intersection of S. Hill Street and 9th Street. Once entering the catch basin, the stormwater is routed to an existing 36-inch Reinforced Concrete Pipe (RCP), City of Los Angeles main storm drain line located within South Hill St. There is no storm drain line in 9th Street along the Project Site so it is assumed that the water draining to the existing area drain and trench drain is discharged to the existing 36-inch RCP within S. Hill as well. Since the Project Site is currently occupied by asphalt parking, the site

imperviousness would not be increasing with development. And, with the City's requirements for Stormwater quality treatment and not allowing an increase in runoff with development, it can be assumed the existing City storm drain system would have sufficient capacity to carry the proposed development runoff.²⁴

Potential impacts to surface water runoff would be reduced to a less than significant level by incorporating stormwater pollution control measures. The Modified Project would be required to demonstrate compliance with Low Impact Development Ordinance standards and retain or treat the first 3/4-inch of rainfall in a 24-hour period. The storage required for this development should be approximately 1,940 cubic feet.²⁵ Compliance with this measure would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. City of Los Angeles Ordinance No. 172,176 and Ordinance No. 173,494 specify Stormwater and Urban Runoff Pollution Control, which require the application of Best Management Practices (BMPs). The Modified Project would also comply with water quality standards and wastewater discharge requirements set forth by the SUSMP for Los Angeles County and Cities in Los Angeles County and approved by the Los Angeles Regional Water Quality Control Board (LARWQCB). The Modified Project would also comply with provisions set forth by the LID Ordinance. Full compliance with the SUSMP, Low Impact Development (LID) Ordinance, and implementation of design-related BMPs would ensure that the operation of the Modified Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality.

Stormwater management design would be required to conform to the City of Los Angeles Stormwater LID Ordinance. The Stormwater LID Ordinance was adopted in November 2011 and requires stormwater mitigation for a larger number of development and redevelopment projects than was previously required under SUSMP. The Ordinance has expanded to include all development and redevelopment projects within the City of Los Angeles that require a building permit and that create, add, or replace 500 square feet or more of impervious area.²⁶ This Ordinance requires developments to capture and treat the first 3/4-inch rainfall in accordance with established stormwater treatment priorities.

The Modified Project falls within the second tier of the LID Ordinance requirements, which states that development projects that involve residential use with five or more units and result in an alteration of at least 50% or more of the impervious surfaces on an existing developed site, the entire site must comply with the standards and requirements of Article 4.4 of Chapter VI of the LA Municipal Code and with the Development Best Management Practices Handbook. The Project Site shall be designed to manage and capture stormwater runoff to the maximum extent feasible utilizing various LID Ordinance techniques,

²⁴ *PSOMAS, 850 South Hill Street Preliminary Due Diligence Report of Existing Infrastructure, dated February 11, 2015. See Appendix G of this IS/MND Addendum.*

²⁵ *Ibid.*

²⁶ *City of Los Angeles, Development Best Management Practices Handbook, Low Impact Development Manual, Part B Planning Activities. Fourth Edition, June 2011.*

including but not limited to infiltration, evapotranspiration, capture for use, high efficiency bio-filtration and retention systems BMP (listed in priority order). If partial or complete on-site compliance of any type is technically infeasible, the Project Site and LID Plan shall be required to comply with all applicable SUSMP requirements in order to maximize on-site compliance.²⁷ Therefore, with implementation of Mitigation Measures 40 through 45 of the Original Project, impacts with respect to water quality would be reduced to a less than significant level. Additionally, Mitigation Measure 45 has been updated to reflect that the Applicant, rather than the Homeowners Association, shall prepare and execute a covenant and agreement for the maintenance of all structural BMPs in accordance with the SUSMP, as the Modified Project is proposing apartments units, rather than condominium units as compared to the Original Project.

Mitigation Measures:

40. The project shall comply with the requirements of the NPDES permit for stormwater discharge and with all applicable requirements of the RWQCB, USEPA and local agencies regarding water quality.
41. The project shall implement stormwater BMPs to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard shall be provided.
42. All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as “NO DUMPING-DRAINS TO OCEAN”) and/or graphical icons to discourage illegal dumping.
43. The legibility of signs and stencils discouraging illegal dumping shall be maintained.
44. Materials used on site with the potential to contaminate stormwater shall be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs.
45. The ~~Homeowners Association~~ Applicant shall prepare and execute a covenant and agreement (Department of City Planning General form (CP-6770)) satisfactory to the Department of City Planning binding the owners to post-construction maintenance of all structural BMPs in accordance with the SUSMP.

²⁷ *Stormwater LID Ordinance (No. 181899), 2011.*

Regulatory Compliance Measures:

RC-WQ-1: Low Impact Development Plan. Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

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

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on groundwater level if it would change potable water levels sufficiently to: (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity.

Original Project

No Impact. The Original Project would not require the use of groundwater. Potable water would be supplied by the Los Angeles Department of Water and Power. Therefore, the Original Project would not require direct additions or withdrawals of groundwater. Excavations for two subterranean levels proposed by the Original Project would not be sufficiently deep to intercept existing aquifers. In addition, since the existing Project Site is approximately 100 percent impermeable, the Original Project would not reduce any existing percolation of surface water into the groundwater table. Therefore, development of the original Project would not impact groundwater supplies or groundwater recharge.

Modified Project

No Impact. As discussed in Section 8(a), and consistent with the conclusions of the 2007 IS/MND, the Project Site is 100 percent impervious. As such, 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. Based on a review of the Seismic Hazard Zone for the Los Angeles 7.5 Minute Quadrangle (California Division of Mines and Geology, 1998), the historically highest groundwater at the Project Site is 90 to 100 feet below the ground surface. The Modified Project should not cause the depletion of the groundwater supplies or the interference of groundwater recharge, since the Project Site is currently 100 percent impervious. The Modified Project would continue to be supplied with potable water by the

LADWP. Further, the Modified Project would comply with LAMC Section 64.70, Stormwater Runoff and Urban Pollution Control. Thus, construction of the Modified Project would not deplete groundwater supplies or interfere substantially with groundwater recharge, and no impact would occur.

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

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

Original Project

No Impact. Construction of the Original Project would temporarily expose on-site soils to surface water runoff. However, compliance with the required provisions of the SWPPP would eliminate erosion and siltation. Alterations to existing drainage patterns within the site and surrounding area would not occur. Therefore, no impact would occur with respect to the alteration of drainage patterns and on- or off-site erosion or siltation.

Modified Project

No Impact. The Project Site is located in a highly urbanized area of Los Angeles, and no streams or river courses are located on or within the Project vicinity. The Project Site is 100 percent impervious. Similar to the Original Project, implementation of the Modified Project would not increase site runoff or result in any changes in the local drainage patterns. Further, the Modified Project would comply with LAMC Section 64.70, Stormwater Runoff and Urban Pollution Control. Therefore, no impact would occur with respect to localized drainage and surface water runoff.

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

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

Original Project

No Impact. Under the Original Project, stormwater or any runoff irrigation waters would be directed into existing storm drains that are currently receiving surface water runoff under existing conditions. Since the existing Project site is entirely impermeable, impermeable surfaces resulting from the

development of the project would not measurably change the volume of storm water runoff. No impact would occur with respect to the alteration of drainage patterns and on- or off-site flooding.

Modified Project

No Impact. Similar to the Original Project, the Modified Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Therefore, as the Modified Project would not substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site, no impact would occur.

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

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

Original Project

No Impact. The Original Project would not create or contribute runoff water that would exacerbate any existing deficiencies in the storm drain system or provide substantial additional sources of polluted runoff. Therefore, the Original Project would have no impact on existing storm drain capacities or water quality.

Modified Project

No Impact. Similar to the site conditions under the Original Project, the Project Site is completely developed with impervious surfaces and nearly 100 percent of surface water runoff is directed to adjacent street storm drains. As discussed above in Section IX (a), the stormwater runoff that sheet flows to the west onto South Hill Street is carried within the street gutter until reaching an existing catch basin at the intersection of S. Hill Street and 9th Street. Once entering the catch basin, the stormwater is routed to an existing 36-inch Reinforced Concrete Pipe (RCP), City of Los Angeles main storm drain line located within South Hill Street. The Modified Project would not result in a significant increase in site runoff, or any changes in the local drainage pattern. Runoff from the Project Site currently is and would continue to be collected on the Project Site and directed towards existing storm drains in the Project vicinity that have adequate capacity. Pursuant to local practice and City policy stormwater retention would be required as

part of the Low Impact Development (LID) Ordinance / SUSMP implementation features (despite no increase in imperviousness of the Project Site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Further any pollutants from the Project Site would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance standards and retain or treat the first ¾ -inch of rainfall in a 24-hour period, which would reduce the Modified Project's impact to the stormwater infrastructure. Therefore, the Modified Project would not create or contribute to runoff water which would exceed capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Potential impacts to surface water quality would be less than significant. Further, the Modified Project would comply with LAMC Section 64.70, Stormwater Runoff and Urban Pollution Control, which would ensure no impact would occur.

f) Would the project otherwise substantially degrade water quality?

A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality.

Original Project

Less Than Significant Impact. Construction activities for the Original Project would occur in accordance with the Los Angeles Building Code Sections 91.7000 through 91.7016, which requires necessary permits, plan checks, and inspections to reduce the effects of sedimentation and erosion. Additionally, project construction would occur in accordance with standard procedures established by the RWQCB. Project compliance with the City's SUSMP requirements and implementation of required water quality BMPs would substantially reduce any existing automobile-related contaminants. Therefore, the Original Project would have a less than significant impact relative to water quality.

Modified Project

Less Than Significant Impact. Similar to the Original Project, the Modified Project does not include potential sources of contaminants, which could potentially degrade water quality and would comply with all federal, state and local regulations governing stormwater discharge. Therefore, the Modified Project would have a less than significant impact relative to water quality.

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

A significant impact could occur if the Project were to place housing within a 100-year flood hazard area. A 100-year flood is defined as a flood, which results from a severe rainstorm with a probability of occurring approximately once every 100 years.

Original Project

No Impact. The Project Site is not located within or near a 100-year flood plain, as indicated on the City of Los Angeles Safety Element 100-Year and 500-year Flood Plains delineation map. Therefore, the Original Project would have no impact relative to any existing 100-year floodplains.

Modified Project

No Impact. According to the Federal Emergency Management Agency (FEMA), the Project Site is not located in an area designated as a 100-year flood hazard area. The Project Site is in a zone designated as Zone X, which signifies that the area is outside the 0.2% annual chance floodplain.²⁸ Therefore, the Modified Project would not place housing within a 100-year flood hazard area, and no impact would occur.

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

A significant impact may occur if the Project was located within a 100-year flood zone, which would impede or redirect flood flows.

Original Project

No Impact. The Project Site is not located within a 100-year flood plain or other flood susceptible area. Therefore, no impact would occur with respect to flood flows.

Modified Project

No Impact. The Project Site is not in an area designated as a 100-year flood hazard area as mapped by the FEMA's Flood Insurance Rate Map. The Project Site is in a zone designated as Zone X, which signifies that the area is outside the 0.2% annual chance floodplain.²⁹ The Project Site is located in an urbanized area. As no changes to the local drainage pattern would occur with implementation of the Modified Project, the Modified Project would not have the potential to impede or redirect floodwater flows. No impact would occur.

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

A significant impact may occur if the Modified Project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam, including but not limited to a seismically-induced

²⁸ *Federal Emergency Management Agency (FEMA), Flood Insurance Rate Map, Los Angeles County, California and Incorporated Areas, Map number 06037C1620F, September 26, 2008.*

²⁹ *Ibid.*

seiche. Seiches are large waves generated in very large enclosed bodies of water or partially enclosed arms of the sea in response to ground shaking.

Original Project

Less Than Significant Level. The Project Site is not located within a delineated potential inundation area resulting from the failure of a levee or dam, as shown by the City of Los Angeles Safety Element Inundation and Tsunami Hazard Areas map. Therefore, the location of the Original Project would not expose people or structures to a significant risk of loss, injury or death involving flooding. Therefore, the Original Project would have a less than significant impact.

Modified Project

Less Than Significant Level. Review of the City of Los Angeles General Plan Safety Element indicates that the Modified Project does not lie within a dam or levee inundation or tsunami hazard area.³⁰ Thus, the Modified Project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. Therefore, a less than significant impact would occur.

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

A significant impact would occur if the Project Site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami), or if the Project Site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. Tsunamis are waves generated in large bodies of water by fault displacement or major ground movement.

Original Project

No Impact. The Project Site is not in the vicinity of or downslope from a reservoir or storage tank capable of creating a seiche. In addition, the Project Site, is not located within a hilly area or positioned downslope from any unprotected slopes or landslide areas. Therefore, the Original Project would have no impact relative to inundation by seiche, tsunami, or mudflow.

Modified Project

No Impact. Review of the City of Los Angeles General Plan Safety Element indicates that the Modified Project does not lie within an inundation or tsunami hazard area.³¹ As discussed in the Geotechnical

³⁰ *City of Los Angeles Department of City Planning, General Plan Safety Element, Safety Element Exhibit G: Inundation & Tsunami Hazard Areas In the City of Los Angeles, March 1994.*

³¹ *Ibid.*

Report (See Appendix B of this IS/MND Addendum), the topography at the Project Site is relatively level and the topography in the immediate site vicinity slopes gently to the south. Additionally, the Project Site is not located within a liquefaction or earthquake-induced landslide zone, as designated by the Hollywood Quadrangle Seismic Hazard Zones Map. Thus, the occurrence of mudflows on the Site is considered remote. Therefore, the Project Site is not subject to slope instability, tsunamis, and seiches. Therefore, no impact would occur.

Cumulative Impacts

Less Than Significant Impact. Development of the Modified Project in combination with the related projects would result in the further infilling of uses in a highly developed area within Downtown Los Angeles. As discussed above, the Project Site and the surrounding areas are served by the existing County storm drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Modified Project and the related project sites, since Downtown Los Angeles is highly developed with impervious surfaces. Under the requirements of the LID Ordinance, each related project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing $\frac{3}{4}$ -inch of rainfall in a 24-hour period. Mandatory structural BMPs in accordance with the NPDES water quality program would therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Modified Project would not make a cumulatively considerable contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. Therefore, cumulative water quality impacts would be less than significant.

X. LAND USE AND PLANNING

a) Would the project physically divide an established community?

A significant impact may occur if the project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (b) the extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and (c) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed project.

Original Project

Less Than Significant Impact. The Original Project would not alter the existing street grid surrounding the Project Site, nor would the Original Project alter any of the existing adjacent land uses. The

established community currently consists of an older and densely developed part of downtown Los Angeles. Although the Original Project would change the existing parking lot to urban residential uses, it would not cause the separation of existing land uses from their ancillary facilities. Development of the Original Project would have a less than significant impact with respect to the division of an established community.

Modified Project

Less Than Significant Impact. The Project Site is located in an urbanized area of the Central City community and is consistent with the existing physical arrangement of the properties within the vicinity of the Project Site. No separations of uses or disruption of access between land use types would occur as a result of the Modified Project. Accordingly, implementation of the Modified Project would not disrupt or divide the physical arrangement of the established community, and similar to the Original Project a less than significant impact with respect to the division of an established community.

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

A significant impact may occur if a project is inconsistent with the General Plan or zoning designations applicable to the project site, and would cause adverse environmental effects.

Original Project

Potentially Significant Unless Mitigation Incorporated. The Original Project proposed 167 joint live/work condominium units in a 21-story structure (17 residential levels, three above ground parking levels and two subterranean parking levels) and 7 commercial condominium units with 4,880 square feet of ground floor retail. The Original Project would include 190,902 square feet of floor area and would be built to the 6:1 FAR as designated by the Community Plan. The Original Project would require the following discretionary approvals:

1. Approval of Vesting Tentative Tract Map 66505, to merge and resubdivide the site into one lot to facilitate the construction of a high density urban mixed-use project containing 167 residential condominium units and 7 commercial condominium units totaling approximately 4,880 square feet of commercial space.
 - The request includes permission to deviate from the Advisory Agency's Residential Parking Policy No. AA 2000-1 (2 parking spaces + 0.25 guest parking spaces per unit) and to permit a parking ratio of 1.55 spaces per unit, inclusive of guest parking.
 - Designate Front Yard
2. Zoning variances as follows:

- An Adjustment from Los Angeles Municipal Code (LAMC) Section 12.17.C.2 to permit an increase in the residential density requirement to allow approximately 79 units based on the Code required 1 unit per 400 square feet of lot area per unit and to permit units 80 through 167 based on zero (0) square feet of lot area per unit. This allows for an average of 190.5 square feet of lot area per unit.
3. Zoning Administrator's Adjustments as follows:
 - An Adjustment from the side yard requirements of LAMC 12.17.C.1 and 2, which requires the project to provide a 20 foot rear yard and side yards of 16 feet. The Applicant is proposing zero (0) yards for levels one through three of the parking structure.
 4. Site Plan Review findings pursuant to LAMC Section 16.05.
 5. Other actions, either ministerial or discretionary, as may be required by the City of Los Angeles to implement and execute the project, including but not limited to:
 - Haul Route approval

The 2007 IS/MND concluded that Original Project would be consistent with applicable land use polices at the local level including the Central City Community Plan, the Redevelopment Plan for the City Center Redevelopment Project, the General Plan Framework, elements of the General Plan, and the LAMC. At the state and regional level, the Original Project is consistent with applicable land use policies of the Los Angeles County Congestion Management Plan (CMP), SCAG's Regional Comprehensive Plan and Guide (RCPG), and the SCAQMD's AQMP. Consistency with the CMP and the AQMP were addressed in the Original Project's Traffic Study. Therefore, with the implementation of the proposed mitigation measures, potential impacts resulting from the discretionary approvals requested by the Original Project, would be less than significant.

On January 2, 2007, the Deputy Advisory Agency conditionally approved Vesting Tentative Tract Map No. 66505 ("VTT-66505")(Case No. ZA-2006-6350-YV-ZAA-SPR) to permit a merger and resubdivision into one lot for a new mixed-use development consisting of 158 joint live/work condominium units in a 21-story structure, with two subterranean parking level and 7 commercial condominium units with 5,780 square feet of ground floor retail as shown on revised map stamp-dated June 23, 2007 in the Central City Community Plan. The Approved Project would include 245 parking spaces, including 8 for guests and none for the retail use. On February 22, 2004 the Office of Zoning Administration conditionally approved Case No. ZA-2006-6350-YV-ZAA-SPR, for an adjustment from Section 12.17-C and 12.17-C.2 of the Los Angeles Municipal Code to permit zero rear and side yards for levels one through three of the structure in lieu of the required 20-foot rear yard and 16-foot side-yard; and Site Plan Review. Thus with implementation of the mitigation measures below, the Original Project would have a less than significant impact.

Mitigation Measures:

46. Prior to recordation of the final tract map for the proposed project, Zoning Administrator Case No. 66505 shall be approved to the satisfaction of the Planning Department as needed to assure

consistency with the goals and objectives of the City of Los Angeles General Plan, the Central City Community Plan and the requirements of the City of Los Angeles Zoning and Municipal Codes.

47. Prior to recordation of the final tract map, the proposed project shall demonstrate that it fully meets the requirements of the Community Redevelopment Agency as needed to assure consistency with the goals and objectives City Center Redevelopment Plan.

Modified Project

Potentially Significant Impact Unless Mitigation Incorporated. The Modified Project proposes the development of a 27-story (320 feet in height above grade) mixed-use building with a maximum of 305 dwelling units and 6,171 square feet of floor area, which includes 3,500 square feet of restaurant uses and 2,671 square feet of retail uses. The Project Site is zoned C5-4D with a land use designation of Regional Center Commercial. The C5 designation indicates that the Project Site has no guidelines for height, yards, minimum area per unit, and minimum lot width for commercial uses. Further, the Project Site is located within the Greater Downtown Housing Incentive Ordinance (Ord. No. 179,076, Eff. September 23, 2007) area which permits reduced yards, redefines “buildable area” to be consistent with “lot area,” permits no prescribed percentage between private and common open space, and eliminates density requirements so long as the total floor area utilized by guest rooms does not exceed the total floor area utilized by dwelling units. The 4D designation indicates that the Project Site is located in Height District 4, which does not specify a maximum height and allows a maximum floor area ratio (FAR) of 13:1. Although, the ‘D’ development specification on the Project Site limits the FAR to 6:1 in the absence of an approved transfer of floor area.

A summary of the differences between the Modified Project and the Original Project, as analyzed in the 2007 IS/MND, is provided in Table II-1 of the Project Description. As shown in Table II-1, the Modified Project results in a net increase of 138 dwelling units, a net increase of 1,291 square feet of retail floor area, and 77 additional parking spaces. The Modified Project would include a TFAR request of 49,999 square feet. The Modified Project would include an increase of 66,667 square feet of floor area and an increase of 6 stories in building height (approximately 74 feet).

Regional Plans

Similar to the Original Project, at the regional level, the Project Site is located within the planning area of the Southern California Association of Governments (SCAG), the region’s federally-designated metropolitan planning organization. The Project is also located within the South Coast Air Basin (SCAB) and therefore is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD) and is subject to SCAQMD’s Air Quality Management Plan (AQMP). The Project Site is located within the Los Angeles Watershed Basin and is subject to the regulatory oversight of the Los Angeles Regional Water Quality Control Board (LARWQCB). In addition, the Project Site is subject to the Congestion Management Plan (CMP) for Los Angeles County.

Regional Comprehensive Plan

SCAG prepared and issued the 2008 RCP in response to the SCAG’s Regional Council directive in the 2002 Strategic Plan to define solutions related to housing, traffic, water, air quality, and other regional challenges. The 2008 RCP serves as a policy framework for implementation of short-term strategies and long-term initiatives to improve regional mobility and sustainability, while also directly addressing the interrelationships between natural resource sustainability, economic prosperity, and quality of life. The 2008 RCP incorporates principles and goals of the 2004 Compass Blueprint Growth Vision. The 2008 RCP includes nine chapter areas: Land Use and Housing, Transportation, Air Quality, Energy, Open Space and Habitat, Water, Solid Waste, Economy, and Security and Emergency Preparedness. Each chapter is organized into three sections: goals, outcomes, and action plans.

The Land Use and Housing Action Plan Chapter addresses issues related to growth and land consumption by encouraging local land use actions which could ultimately lead to the development of an urban form that would help minimize development costs, save natural resources, and enhance the quality of life in the region. Consistency and compatibility of the Modified Project with the goals identified in the Land Use and Housing Action Plan Chapter are discussed in Table III-8. The Modified Project would have a less-than-significant effect on land use and housing related RCP goals.

**Table III-8
Comparison of Project Characteristics To RCP Land Use and Housing Goals**

Land Use And Housing Goals	Consistency of the Modified Project
Focusing growth in existing and emerging centers and along major transportation corridors.	The location of the Modified Project is identical to the location of the Original Project. The Project Site is located on an infill lot in a highly urbanized area of Downtown Los Angeles and is adjacent to existing residential uses. The Project Site is in walking distance to numerous services, retail, and employment opportunities. Additionally, the Project Site is in close proximity to many public transportation options, including bus and subway lines. Thus, the Modified Project supports growth in existing and emerging centers and along major transportation corridors.
Creating significant areas of mixed-use development and walkable, “people-scaled” communities.	The Modified Project includes a mixed-use development that consists of up to 3,500 square feet of restaurant uses, 2,671 square feet of retail uses and 305 apartment units. Similar to the Original Project, the Modified Project would be located in an area with a significant amount of mixed-use development with walkable, pedestrian-scaled communities. The building’s design and ground floor retail would further enhance the walkability of the surrounding neighborhood.
Providing new housing opportunities, with building types and locations that respond to the region’s changing demographics.	Similar to the Original Project, the Modified Project would provide new housing opportunities in Downtown Los Angeles, which would include studios, one-bedroom, and two-bedroom dwelling units. The units would be available to all persons without discrimination. Thus, the Modified Project is providing new housing opportunities that respond to the region’s changing demographics.
Targeting growth in housing, employment and commercial development within walking distance of existing and planned transit stations.	The Modified Project, similar to the Original Project, would place new housing and retail space in a highly walkable and transit-rich area. The Project Site is an infill site within a Transit Priority Area. It is located within ½ mile of two existing rail transit

Land Use And Housing Goals	Consistency of the Modified Project
	stations, the 7 th Street Metro Rail transit station, and the Pershing Square Metro Rail transit station. The Project Site is also located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The Project Site is in walking distance to numerous services, retail, and employment opportunities within Downtown Los Angeles.
Injecting new life into under-used areas by creating vibrant new business districts, redeveloping old buildings and building new businesses and housing on vacant lots.	Similar to the Original Project, the Modified Project would develop an underutilized surface parking lot in Downtown Los Angeles with a new mixed-use development, which includes 305 apartment units and up to 6,171 square feet of ground floor commercial space. The Project is designed to promote pedestrian activity with the retail stores' main entrances fronting the public right-of-way. Additionally, the Project's location near mass transit and in walking distance to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. Thus, the Modified Project is consistent with this goal.
Preserving existing, stable, single-family neighborhoods.	Similar to the Original Project, the Modified Project does not conflict with attainment of this goal. The Project Site is located in a highly urbanized neighborhood in Downtown Los Angeles. The Project Site is currently zoned C5-4D with the land use designation of Regional Center Commercial. The Project Site would not impede on the preservation of existing single-family neighborhoods.
Protecting important open space, environmentally sensitive areas and agricultural lands from development.	The Project Site is currently zoned C5-4D with the land use designation of Regional Center Commercial. The Project Site is currently occupied by a surface parking lot in a highly urbanized area in Downtown Los Angeles. As such, there are no wildlife corridors or native wildlife nursery sites in the Project vicinity. 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 is not zoned for agricultural production, and no farmland activities exist on-site. In addition, no Williamson Act Contracts are in effect for the Project Site. Therefore, similar to the Original Project, the Modified Project is consistent with this goal.
<p><i>Source(s): Land Use and Housing Goals: Southern California Association of Governments, Final 2008 Regional Comprehensive Plan, Land Use and Housing Action Plan Chapter.</i></p> <p><i>Consistency Analysis: Parker Environmental Consultants, January 2016.</i></p>	

SCAQMD Air Quality Management Plan

The Modified Project is located within the South Coast Air Basin (Basin) and, therefore, falls under the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The SCAQMD's Air Quality Management Plan (AQMP) was updated in 2003 to establish a comprehensive air pollution control program leading to the attainment of State and federal air quality standards in the Basin, which is a non-attainment area. With approval of the TFAR, the Modified Project, similar to the Original Project, conforms to the zoning and land

use designations for the Project Site as identified in the General Plan, and, as such, would not add emissions to the Basin that were not already accounted for in the approved AQMP. Air quality impacts by the Modified Project and consistency of the Project with the AQMP is analyzed in greater detail in Section III (Air Quality) of this IS/MND Addendum. Furthermore, as noted in Checklist Question 2, Air Quality, the Modified Project would not exceed the daily emission thresholds during the construction or operational phases of the Project. Therefore, similar to the Original Project, the Modified Project would be consistent with the AQMP.

Congestion Management Plan

The CMP for Los Angeles County was developed in accordance with Section 65089 of the California Government Code. The CMP is intended to address vehicular congestion relief by linking land use, transportation and air quality decisions. Further, the program seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel and to propose transportation projects, which are eligible to compete for state gas tax funds. To receive funds from Proposition 111 (i.e., state gasoline taxes designated for transportation improvements) cities, counties, and other eligible agencies must implement the requirements of the CMP. Within Los Angeles County, the Metropolitan Transportation Authority (MTA) is the designated congestion management agency responsible for coordinating the County's adopted CMP. The Project Traffic Study was prepared in accordance with the County CMP and City of Los Angeles Department of Transportation (LADOT) Guidelines. Project traffic impacts are analyzed in greater detail in Section XVI (Transportation/Circulation) of this IS/MND Addendum.

Local Plans

General Plan

The Modified Project would conform to objectives outlined in the City of Los Angeles General Plan (General Plan). The General Plan is a comprehensive, long-range declaration of purposes, policies and programs for the development of the City. The General Plan is a dynamic document consisting of several elements including: Health and Wellness, Air Quality, Conservation, Housing, Noise, Open Space, Public Facilities and Services, Safety, Mobility, and Economic Development. Additionally the General Plan includes the Land Use Element, which provides individual plans for each of the City's 35 Community Planning Areas.

Consistent with the Original Project, those elements that would be most applicable to the Modified Project are the Housing Element, the Mobility Element, the Conservation Element, and the Land Use Element. Table III-9, below, provides a project consistency analysis with the applicable goals of the Housing, Mobility and Conservation Elements of the General Plan Framework. Consistency with the Land Use Element is further analyzed under the Central City Community Plan for Residential and Commercial Land Uses presented in Table III-10. As shown in Table III-9, the Modified Project is consistent with the applicable elements of the General Plan.

**Table III-9
City of Los Angeles General Plan Consistency Analysis**

City of Los Angeles General Plan Goals	Project Consistency Analysis
<i>Housing Element Goals</i>	
<p>1. A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy and affordable to people of all income levels, races, ages, and suitable for their various needs.</p>	<p>Similar to the Original Project, the Modified Project would increase the housing stock in Downtown Los Angeles by providing safe, attractive, and centrally located studios, one-bedroom, and two-bedroom apartment units. The 305 units included in the Modified Project would be available to all persons, including existing Downtown employees and residents, without discrimination. Thus, the Modified Project is contributing to the range of housing choices available to Downtown employees and residents and is therefore consistent with this goal.</p>
<p>2. A City in which housing helps to create safe, livable and sustainable neighborhoods.</p>	<p>Similar to the Original Project, the Modified Project would redevelop an underutilized site that is currently used as a surface parking lot. Unlike the Original Project, however, the Modified Project would be designed and landscaped in accordance with the design guidelines of the Downtown Design Guide and the Historic Downtown Los Angeles Design Guidelines. Compliance with Mitigation Measure 1 would further ensure that the building maintains a safe, clean, and attractive environment during the Modified Project’s construction and operation. As such, the Modified Project would eliminate and prevent the spread of blight and deterioration by redeveloping an underutilized site. The Modified Project is therefore consistent with this goal.</p>
<p>3. A City where there are housing opportunities for all without discrimination.</p>	<p>Similar to the Original Project, the Modified Project’s dwelling units would be available at market rate. The Project is increasing the housing choices available in Downtown Los Angeles. The Modified Project can attract new and existing, economically, and ethnically diverse households, and as such is consistent with this goal.</p>
<i>Mobility Element Key Goals</i>	
<p>1. Safety First: Crashes, speed, protection, security, safety education, and enforcement.</p>	<p>Similar to the Original Project, the Modified Project would not include unusual or hazardous design features. Current vehicular access to the Project Site is provided by one driveway along 9th Street and one driveway along S. Hill Street. Similar to the Original Project, the Modified Project would include one two-way driveway located off of S. Hill Street and one two-way driveway off 9th Street. As such the Modified Project would not include new vehicular access driveways that could potentially conflict with pedestrian circulation and traffic. The Modified Project does not include any hazardous design features, which could impede emergency access. The Modified Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. As such, similar to the Original Project, the Modified Project would not substantially increase hazards due to design features, or incompatible uses, and would be therefore be consistent with this goal.</p>
<p>2. World Class Infrastructure: Design, Complete Streets Network (walking,</p>	<p>This goal is directed toward City goals and is not specifically applicable to the Modified Project. Nonetheless, the Modified</p>

City of Los Angeles General Plan Goals	Project Consistency Analysis
<p>bicycling, transit, vehicles, goods movement), Bridges, Highways, Smart Investments.</p>	<p>Project’s location near mass transit, walking distance to services, retail stores, and employment opportunities, and the availability of bike parking located on the Project Site promotes a variety of transportation options. Thus, because the Modified Project would provide abundant bike parking that would be easily available, and because the Modified Project has been designed to be consistent with the Downtown Design Guidelines and Historic Downtown Design Guidelines, the Modified Project is more than consistent with this goal as compared to the Original Project.</p>
<p>3. .Access for All Angelenos: Affordability, vulnerable users, land use, operations, reliability, demand management, community connections.</p>	<p>The Project Site is located in a highly urbanized area of Downtown Los Angeles within a Transit Priority Area (as defined by CEQA). Similar to the Original Project, the Modified Project would develop new residential and commercial uses in walking distance to numerous services, retail, and employment opportunities. Additionally, the Project Site is located within ½ mile of two existing rail transit stations, the 7th Street Metro rail transit station, and the Pershing Square Metro Rail transit station. The Project Site is also located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The location of the Modified Project encourages a variety of transportation options and access and is therefore consistent with this goal.</p>
<p>4. Collaboration, Communication and Informed Choices: Real-time information, open-source data, transparency, monitoring, reporting, departmental and agency cooperation, database management, parking options, loading and unloading, goods movement.</p>	<p>This goal is directed toward City goals and is not specifically applicable to the Modified Project. Nonetheless, with respect to collaboration and department cooperation, the Traffic Study analysis prepared for the Modified Project (see Appendix F of this Addendum) was determined in conjunction with the City of Los Angeles Department of Transportation (LADOT) and conducted in accordance with the LADOT Traffic Study Guidelines. The Modified Project would provide parking on site for residential uses, as well as on-site loading areas.</p>
<p>5. Clean Environments and Healthy Communities Environment, public health, clean air, clean fuels and fleets.</p>	<p>Similar to the Original Project, the Modified Project is an infill development in a High Priority Transit Area and is within a major employment center. The location of the Modified Project promotes the use of a variety of transportation options, which includes walking, biking and the use of public transportation. As discussed further in Sections III. Air Quality and VII. Greenhouse Gas Emissions, operational emissions and greenhouse gas emissions generated by the Modified Project would not exceed the regional thresholds of significance set by the SCAQMD and therefore, the Modified Project is consistent with this goal.</p>
<p>Conservation Element Objectives</p>	
<p>1. Agricultural lands: Retain in agricultural use, as appropriate, the last state designated significant agricultural parcel within the city, the Pierce College parcel.</p>	<p>As discussed further in Section II. Agriculture and Forestry Resources, of this Addendum, the Project Site is located in a highly developed area of Downtown Los Angeles. No farmland or agricultural activity exists on the Project Site, nor are there any farmland or agricultural activities in the vicinity of the Project Site. According to the “Los Angeles County Important Farmland 2010” map, which was prepared by the California Department of Conservation, Division of Land Resource</p>

City of Los Angeles General Plan Goals	Project Consistency Analysis
	Protection, the soils at the Project Site are not candidate for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, similar to the Original Project, the Modified Project would not result in an impact to agricultural lands and would be consistent with this objective.
2. Animal keeping, nurseries, crop and gardens: Retain, to the extent feasible, the last remaining agricultural features of the city as part of the city's heritage and economy.	As discussed above and in Section II. Agricultural and Forestry Resources of this Addendum, the Project Site is located in a highly urbanized area of Downtown Los Angeles and does not contain animal keeping, nursing or gardens, nor does such uses exist in the vicinity of the project area. Therefore, similar to the Original Project the Modified Project would be consistent with this objective.
3. Archaeological and paleontological: Protect the city's archaeological and paleontological resources for historical, cultural, research and/or educational purposes.	As discussed further in Section IV. Cultural Resources, no known archaeological or paleontological sites are identified on the Project Site. There is no evidence that suggests any archaeological sites or paleontological resources exist on the Project Site. The Project Site has been previously developed and is located in a highly urbanized area of Downtown Los Angeles. However, because there is potential for archaeological and paleontological resources to exist at sub-surface levels on the Project Site, which may be uncovered during excavation for the proposed one level subterranean parking garage, Mitigation Measures 17 through 20 have been incorporated as mitigation. As such, similar to the Original Project, the Modified Project would be consistent with this objective.
4. Cultural and historical: Protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.	As discussed further in Section IV. Cultural Resources and the Historic Assessment (See Appendix H of this Addendum), while the Project Site does not contain any existing structures or historical resources, the Project Site is located in both the South Park and Historic Core areas of the Central City area. As such, its location can be considered the transitional zone between the Historic Core and South Park. However, as concluded in the Historic Assessment, the Modified Project would comply with Standards 9 and 10 of the Secretary of the Interior's Standards for Rehabilitation and construction of the proposed tower would not result in adverse effects to historic resources located immediately adjacent to or in the near vicinity of the Project Site. Therefore, the Modified Project would be consistent with this objective.
5. Endangered species: Protect and promote the restoration, to the greatest extent practical, of sensitive plant and animal species and their habitats.	As discussed further in Section IV. Biological Resources of this Addendum, the Project Site is improved with a paved surface parking lot. As concluded in the 2007 IS/MND, the Project Site does not contain any critical habitat or support any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. However, there are three existing trees (<i>jacaranda sp.</i>) on the public right-of-way fronting S. Hill Street and two existing trees (<i>ficus sp.</i>) on the public-right-of-way fronting W. 9 th Street. One of the trees on the public right-of-way fronting S. Hill Street would be removed or relocated to allow for the improvement of the existing sidewalk. The existing trees are not a protected species as defined by the City

City of Los Angeles General Plan Goals	Project Consistency Analysis
	of Los Angeles’ Protected Tree Ordinance. Additionally, the Project Applicant shall comply with the measures listed in Regulatory Compliance Measures RC-BIO-1 and RC-BIO-2 to ensure that no significant impacts to nesting birds, sensitive biological species or habitat, or street trees would occur. As such, the Modified Project would be consistent with this objective.
6. Equine areas: Retain equine oriented uses as a part of the city's heritage and for recreational, educational and economic purposes.	The Project Site is currently occupied by surface parking and is located in a highly developed area of Downtown Los Angeles. As such development of the Modified Project, similar to the Original Project, does not have the potential to disrupt equestrian designated areas and is therefore consistent with this objective.
7. Erosion: Protect the coastline and watershed from erosion and inappropriate sedimentation that may or has resulted from human actions.	As discussed further in Section VI. Geology and Soils of this Addendum, erosion resulting from construction of the Modified Project would be reduced by implementation of stringent erosion controls imposed by the City of Los Angeles through grading and building permit regulations. Minor amounts of erosion and siltation could occur during grading. The potential for soil erosion during the ongoing operation of the Modified Project is extremely low due to the generally level topography of the Project Site, and the fact that the Project Site would be mostly paved-over or built upon so little soil would be exposed. All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. Furthermore, as discussed in Section IX. Hydrology and Water Quality, the Modified Project would be required to implement a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan and Best Management Practices. Therefore, with incorporation of Mitigation Measures 23 through 27, impacts associated with soil erosion and loss of topsoil would remain less than significant and the Modified Project would be consistent with this objective.
8. Fisheries: Protect fisheries and enhance, restore or create fisheries for native fish populations and for sport fishing or harvesting in city-managed waters.	The Project Site is currently occupied by surface parking and is located in a highly developed area of Downtown Los Angeles. As such development of the Modified Project, similar to the Original Project, does not have the potential to disrupt fisheries and is therefore consistent with this objective.
9. Forest: Retain the forests as primary watershed, open space and recreational resources for the region.	The Project Site is zoned C5-4D, which has a land use designation of Regional Center Commercial in the Central City Community Plan. The Project Site is not zoned as forestland or timberland, and there is no timberland production at the Site. Therefore, similar to the Original Project, the Modified Project would have no impact associated with the conversion of farmland and would be consistent with this objective.
10. Habitats/ecological areas: Preserve, protect, restore and enhance natural plant and wildlife diversity, habitats, corridors and linkages so as to enable the healthy	As discussed further in Section IV. Biological Resources of this Addendum, the Project Site is improved with a paved surface parking lot. The Project Site does not contain any critical habitat or support any species identified as a candidate, sensitive, or

City of Los Angeles General Plan Goals	Project Consistency Analysis
<p>propagation and survival of native species, especially those species that are endangered, sensitive, threatened or species of special concern.</p>	<p>special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The Project Site 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 Modified Project is consistent with this objective.</p>
<p>11. Habitats and scenic areas outside the city: Protect important natural habitats and scenic sites outside the city which are owned by the city or are impacted by city facilities.</p>	<p>The Project Site is located in a highly developed area of Downtown Los Angeles. As such development of the Modified Project, similar to the Original Project, does not have the potential to disrupt habitat or scenic areas outside the City of Los Angeles and is therefore consistent with this objective.</p>
<p>12. Land form and scenic vistas: Protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations.</p>	<p>As further discussed in Section I. Aesthetics of this Addendum, there are no unique scenic vistas or focal point views available to the north, south, east or west of the Project Site. Panoramic views within the vicinity of the Project Site consist primarily of the downtown skyline. At street level views of downtown are largely confined by the existing street walls, street level landscaping and existing buildings, which is characteristic of the urban setting. Views of the downtown skyline are primarily visible from a distance from vantage points along the Santa Monica freeway (I-10), the Harbor/Pasadena freeway (I-110/SR-110) and the Hollywood freeway (US-101). Although the Modified Project results in an increase of 6 stories in building height (approximately 74 feet), as compared to the Original Project, the difference in height is keeping with the surrounding urban form where a variety of building heights in commonplace. Therefore, the Modified Project would not adversely affect the existing visual access to panoramic views within the vicinity of the Project. Additionally, with respect to focal views, the Modified Project would not materially alter the setting of the Eastern Columbia, Broadway Trade Center, Coast Federal Savings, or former May Company Garage buildings, within the historic district. Therefore, similar to the Original Project, the Modified Project would have a less than significant impact on scenic vistas within the project vicinity and would therefore be consistent with this objective.</p>
<p>13. Oceans: Protect and enhance the diversity and sustainability of the natural ecologies of the Santa Monica and San Pedro bays, including the bay fishery populations.</p>	<p>The Project Site is located in a highly developed area of Downtown Los Angeles. As such development of the Modified Project, similar to the Original Project, does not have the potential to disrupt natural ecologies of oceans or bays and is therefore consistent with this objective.</p>
<p>14. Resource management - mineral resources (sand and gravel): Conserve sand and gravel resources and enable appropriate, environmentally sensitive extraction of sand and gravel deposits.</p>	<p>As discussed in Section XI. Mineral Resources, similar to the Original Project, the Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has historically been used for the extraction of mineral resources. Therefore, no impact to locally important mineral resources would occur and the Modified Project would be consistent with this objective.</p>
<p>15. Resource management (fossil fuels) - petroleum (oil and gas): Conserve petroleum resources and enable appropriate, environmentally sensitive</p>	<p>As discussed in Section XI. Mineral Resources, the Project Site is not located within the Los Angeles Downtown Oil Field and Oil Drilling/Surface Mining Supplemental Use District, or an Oil Field/Drilling Area. The Project Site is currently developed</p>

City of Los Angeles General Plan Goals	Project Consistency Analysis
<p>extraction of petroleum deposits located within the city's jurisdiction so as to protect the petroleum resources for the use of future generations and to reduce the city's dependency on imported petroleum and petroleum products.</p>	<p>with a surface parking lot. The Project Site is not currently used for the extraction of mineral resources. Therefore, the development of the Modified Project would not result in the loss of availability of a known mineral resource and the Modified Project would be consistent with this objective.</p>
<p><i>Sources: City of Los Angeles General Plan Elements, Housing Element 2013-2021, Chapter 6, Housing Goals, Objectives, Policies and Programs; City of Los Angeles General Plan Elements, Mobility Plan 2035; and Conservation Element of the City of Los Angeles General Plan (Adopted September 2001). Parker Environmental Consultants, January 2016.</i></p>	

Central City Community Plan

The Project Site is located within the Central City Community Plan (“Community Plan”) area of the City of Los Angeles. More specifically, the Project Site is located within Downtown Los Angeles’ South Park neighborhood and Historic Core, which has an abundant collection of historic buildings with unique character-defining features such as scale, patterns, streetscape and architecture that accentuates the urban character of Downtown Los Angeles. As such, development on the Project Site is further defined by the Redevelopment Plan for the City Center Redevelopment Project (“Redevelopment Plan”), Downtown Design Guide and the Historic Downtown Los Angeles Design Guidelines. Specific design considerations from the Redevelopment Plan include: height, development densities, building setbacks, signage, open space and privacy, utilities, parking and loading facilities. Both the Downtown Design Guide and Historic Downtown Los Angeles Design Guidelines guide the proposed building’s architectural design and siting, including: sidewalks and setbacks, ground floor treatment, parking and access, massing and street wall design, on-site open space, architectural design, and signage. The Design Guidelines also provide goals and improvements to the Downtown and Historic Core area including streetscape improvements, renovation and improvements to historic buildings, public art, and civic and cultural life. Additionally, the Project Site is located within the Greater Downtown Housing Incentive area, the Central City Parking Exception area, the Downtown Business Parking Exception District, the Central City Transfer of Floor Area Rights area, the Downtown Adaptive Reuse Incentive area, and an enterprise zone (the Employment and Economic Incentive Program area). The Project has been designed to comply with all applicable General Plan and zoning designations and requests a transfer of floor area (TFAR) 49,999 square feet of floor area in compliance with the requirements of the LAMC for the Project area.

All development activity on-site is subject to the land use regulations of the Central City Community Plan. The Community Plan goals and objectives include providing organized growth, a Central City identity, and a full range of housing choices for employees and residents in the downtown area. As described in the Community Plan, the Historic Core/Center City contains a concentration of architecturally significant buildings and is a center for wholesale and retail jewelry manufacturing for the region. Many vacant and underused commercial and office buildings in the Historic Core are being converted to residential uses and ground-floor commercial uses which supports neighborhood retail,

services and amenities for a growing residential community.³² The Modified Project, which would provide a mixed-use residential/retail development in an underutilized area of Central City, would conform to the goals, objectives, and land uses identified in the Community Plan.

The Modified Project would revitalize the area with the development of a 27-story mixed-use residential and commercial building. The Modified Project would provide a maximum of 305 dwelling units and 6,171 square feet of ground-floor commercial space, which includes 3,500 square feet of restaurant uses and 2,671 square feet of retail uses, with a total of 336 automobile parking spaces and 343 bicycle spaces. The Modified Project would provide a variety of on-site amenities, which would include but is not limited to, common open space, private balconies, rooftop terrace, landscaping features, pool and spa with a pool deck, and outdoor seating. A detailed analysis of the consistency of the Modified Project with the applicable objectives and policies of the Central City Community Plan for Residential and Commercial Land Uses is presented in Table III-10.

Table III-10
Project Consistency with Applicable Objectives and Policies of the
Central City Community Plan Land Use Element for Residential and Commercial Land Uses

Objective / Policy	Project Consistency Analysis
<i>Residential</i>	
Objective 1-2: To increase the range of housing choices available to Downtown employees and residents.	Similar to the Original Project, the Modified Project would increase the housing stock in Downtown Los Angeles. The Modified Project would provide safe, attractive, and centrally located studios, one-bedroom, and two-bedroom apartment units. The units would be available to all persons, including existing Downtown employees and residents, without discrimination. Thus, the Modified Project, similar to the Original Project, would contribute to the range of housing choices available to Downtown employees and residents.
Objective 1-3: To foster residential development which can accommodate a full range of incomes.	Similar to the Original Project, the Modified Project’s dwelling units would be available at market rate. The Modified Project is increasing the housing choices available in Downtown Los Angeles. The Modified Project can attract new and existing, economically, and ethnically diverse households, which is a goal of the General Plan and Community Plan. Thus, the Modified Project supports this objective.
Policy 1-3.1: Encourage a cluster neighborhood design comprised of housing and services.	The Project Site is located in a highly urbanized area of Downtown Los Angeles and is adjacent to existing residential uses. The Project Site is in walking distance to numerous services, retail, and employment opportunities. Additionally, the Project Site is in close proximity to many public transportation options, including bus and subway lines. Thus, the Modified Project, similar to the Original Project, supports the cluster neighborhood design concept of including residents near neighborhood facilities.

³² City of Los Angeles Department of City Planning, *Central City Community Plan, 2003*.

Objective / Policy	Project Consistency Analysis
Objective 1-4: To facilitate the conversion of historic buildings in the Historic Core to housing, office, art, and cultural uses in order to attract new residents.	This objective does not specifically pertain to the Modified Project since it addresses the conversion of historic buildings and not the construction of new buildings. The Modified Project, similar to the Original Project, may attract new residents to the Historic Core and South Park area by providing new dwelling units.
Objective 1-5: To preserve the existing low-income housing stock, including single room occupancy (SRO) units.	Similar to the Original Project, the Modified Project would not demolish existing low-income housing. Therefore, the Project would not conflict with this objective.
Policy 1-5.1: Monitor the supply of low-income housing stock to guard against loss of units demolition, conversion, and deterioration of units.	There are no residential units on-site and development of the Modified Project would not demolish or otherwise deteriorate residential units. As such, similar to the Original Project, the Modified Project would not demolish, convert, or deteriorate low-income housing.
Commercial	
Objective 2-1: To improve Central City's competitiveness as a location for offices, business, retail, and industry.	The Modified Project includes up to 6,171 square feet of ground-floor retail and restaurant space. The Modified Project would provide new housing, which would provide new foot traffic to support existing and new businesses in this high-density mixed-use neighborhood. Thus, similar to the Original Project, the Modified Project would foster new business and employment opportunities and potential customers, which would help to improve the competitiveness of the Downtown commercial area.
Policy 2-1.2: To maintain a safe, clean, attractive, and lively environment.	Similar to the Original Project, the Modified Project would remove surface parking and replace it with a safe, clean and attractive development. Additionally, the design of the Modified Project would not conflict with the Downtown Design Guide and the Historic Downtown Los Angeles Design Guidelines. All building plans would further require approval from the City. Compliance with Mitigation Measure 1 would ensure that the building maintains a safe, clean, attractive and lively environment during the Project's construction and operation.
Objective 2-2: To retain the existing retail base in Central City.	The Project Site is currently developed with a surface parking lot. Both the Original Project and the Modified Project The Project would remove the surface parking lot and construct ground-floor retail and restaurant space which provides new opportunities for new businesses or the expansion or relocation of existing businesses. The Modified Project would not adversely impact other retail stores in the vicinity of the Project Site. Instead, new residents would likely provide new customers to support nearby local businesses. As such, the Modified Project, similar to the Original Project, would not hinder the goals of this objective.
Policy 2-2.1: Focus on attracting businesses and retail uses that build on existing strengths of the area in terms of both the labor force and businesses.	The Modified Project includes up to 6,171 square feet of ground floor- commercial space, which includes 3,500 square feet of restaurant uses and 2,671 square feet of retail uses. As such, the Project provides new space and opportunities that can attract businesses Downtown. As such, the Modified Project, similar to the Original Project, is consistent with this policy.
Policy 2-2.2: To encourage pedestrian-oriented and visitor serving uses during the evening hours	As the Modified Project has been designed in compliance with the Downtown Design Guidelines with approximately 210 feet

Objective / Policy	Project Consistency Analysis
<p>especially along Grand Avenue cultural corridor between the Hollywood Freeway (US 101) and Fifth Street, the Figueroa Street corridor between the Santa Monica Freeway (I-10) and Fifth Street and Broadway between Third Street and Ninth Street.</p>	<p>of retail frontage on both Hill Street and 9th Street, the Modified Project would activate the streetscape with its pedestrian orientation, retail and restaurant space and accessibility to visitors. Additionally, similar to the Original Project, the Project Site is in walking distance from many services, employment opportunities, and retail spaces. Additionally, the Project Site is located in a transit-rich area and is in close proximity to numerous bus and subway lines.</p>
<p>Policy 2-2.3: Support the growth of neighborhoods with small, local retail services.</p>	<p>The Modified Project would include neighborhood serving ground-floor retail space. Thus, the Project would add local retail services to support and the growth of the neighborhood, similar to the Original Project. The Modified Project would be consistent with the policy.</p>
<p>Objective 2-3: To promote land uses in Central City that will address the needs of all the visitors to Downtown for business, conventions, trade shows, and tourism.</p>	<p>The Modified Project, similar to the Original Project, would further the variety of uses in the surrounding neighborhood by adding a mixed-use building to an area that is characterized by mixed-use development. The building’s design and ground-floor retail would enhance pedestrian activity in the area.</p>
<p>Objective 2-4: To encourage a mix of uses which create an active, 24-hour downtown environment for current residents and which would also foster increased tourism.</p>	<p>The proposed mixed-use Modified Project would contribute and support this objective by adding new residents and ground-floor retail spaces. The Modified Project would be designed to enhance pedestrian activity with the retail stores’ main entrances fronting the public right-of-way and providing night-time lighting for enhanced security. These features, among others, would contribute to an active, 24-hour downtown environment. Thus, the Modified Project, similar to the Original Project, would be consistent with this objective.</p>
<p>Policy 2-4.1: Promote nightlife activity by encouraging restaurants, pubs, night clubs, small theaters, and other specialty uses to reinforce existing pockets of activity.</p>	<p>The Modified Project includes ground-floor retail and restaurant space. The retail space would be available to commercial uses. The Project would be designed to enhance pedestrian activity with the retail stores’ main entrances fronting the public right-of-way and providing night-time lighting for enhanced security. The Modified Project would reinforce and add to the attraction of these pockets of activity by adding new residents to the area. Thus, the Modified Project is consistent with this policy.</p>
<p>Objective 2-5: To increase specialty and ethnic markets in order to foster a diverse range of retail and commercial uses in Central City.</p>	<p>Similar to the Original Project, the Modified Project provides new ground-floor retail space, which would be available to commercial uses, including specialty and ethnic stores and restaurants. Additionally, the Modified Project supplements the land uses of the surrounding area. Thus, the Project supports this objective.</p>
<p>Policy 2-5.1: Make Downtown a tourist destination by combining its cultural commercial offerings with those of the ethnic communities surrounding it.</p>	<p>With the development of the Modified Project, Downtown would remain a tourist destination as the Project would contribute to the skyline. Cultural commercial offerings and the nearby ethnic communities would remain unaffected by the Modified Project. Further, the Modified Project, Similar to the Original Project, would increase the resident population downtown which would indirectly increase visitors to cultural and tourist destinations.</p>
<p><i>Source: City of Los Angeles, Central City Community Plan, Land Use and Planning Element Parker Environmental Consultants, January 2016.</i></p>	

The Central City Community Plan addresses planning and land use issues and opportunities in various sectors, such as residential, industrial, commercial, transportation, among others. The Central City Community Plan projected a population of 27,212 persons (or 34,765 persons when development of dwelling units in commercial areas are included) and 14,398 dwelling units by 2010 within the Community Plan area.³³ The 2010 United States Census shows that the Central City Community Plan area had a population of 36,098 persons and 22,752 dwelling units.³⁴ The 2010 Census data shows that the actual population and housing units in the Central City Community Plan area in 2010 was higher than what was projected. Nevertheless, as discussed in Section XIII. Population and Housing, the Modified Project is consistent with SCAG's population and housing growth projections for the City.

The Modified Project would be consistent with the goals, objectives, and policies set forth in the Central City Community Plan. Therefore, similar to the Original Project impacts related to the consistency with the applicable land use and planning policies in the Central City Community Plan would be less than significant.

Redevelopment Plan for the City Center Redevelopment Project

The Modified Project is located within the Historic Downtown within the City Center Redevelopment Project area, which was established by the Community Redevelopment Agency of the City of Los Angeles (CRA/LA). Due to State legislation, the CRA/LA has since been disbanded and there is a successor agency to the CRA/LA. Development in the City Center Redevelopment Project Area is governed by the Redevelopment Plan that was adopted in May 2002 by the CRA/LA and remains effective until May 2032. The Redevelopment Plan identifies overall objectives and development standards to guide the development, redevelopment, and rehabilitation of properties within the City Center area. The City Center area encompasses much of the Historic Core, City Markets, and South Park. Table III-11, below, provides a detailed analysis of the consistency of the Modified Project with the applicable objectives of the Redevelopment Plan. If and until such time as the Successor Agency to the CRA/LA transfers land use functions to the City or some other agency, the Successor Agency to the CRA/LA has jurisdiction over the implementation of the Redevelopment Plan.

³³ *City of Los Angeles Department of City Planning, Central City Community Plan, Plan Population and Dwelling Unit Capacity Table.*

³⁴ *The Central City Community Plan Area contains the following tracts: 2074, 2075.01, 2075.02, 2073.01, 2073.02, 2062, 2077.10, 2079, 2240.10, 2260.02, and 2063. The population and dwelling units were calculated by summing the individual tracts together. Source: United States Census Bureau, 2010 Census Interactive Population Map, website: <http://www.census.gov/2010census/popmap/>, accessed May 2015.*

**Table III-11
Project Consistency with Applicable Objectives of the Redevelopment Plan**

Objective	Project Consistency Analysis
To eliminate and prevent the spread of blight and deterioration and to rehabilitate and redevelop the Project Area in accordance with this Plan.	The Modified Project, similar to the Original Project, would redevelop an underutilized site that is currently used as a surface parking lot. The Modified Project would be attractively designed and landscaped in accordance with the design guidelines of the Downtown Design Guide and the Historic Downtown Los Angeles Design Guidelines. Compliance with Mitigation Measure 1 would further ensure that the building maintains a safe, clean, and attractive environment during the Project’s construction and operation. As such, the Project would eliminate and prevent the spread of blight and deterioration by redeveloping an underutilized site in accordance with the Plan. The Modified Project is consistent with the objective.
To further the development of Downtown as the major center of the Los Angeles metropolitan region, within the context of the Los Angeles General Plan as envisioned by the General Plan Framework, Concept Plan, City-wide Plan portions, the Central City Community Plan, and the Downtown Strategic Plan.	The Modified Project would be designed and developed with the guidance of City Planning Staff and the applicable plans. Therefore, the Project would further the goals of the Los Angeles General Plan, Framework Element, Concept Plan, City-wide Plan, the Central City Community Plan, and the Downtown Strategic Plan. Thus, the Modified Project is consistent with this objective.
To create an environment that will prepare, and allow, the Central City to accept that share of regional growth and development which is appropriate, and which is economically and functionally attracted to it.	The Modified Project would contribute up to 305 dwelling units, which would contribute to an increase of population and housing beyond 2010 housing and population projections for Central City CPA. Nevertheless, similar to the Original Project, the Modified Project’s housing and population generation is consistent with SCAG’s growth projections for the Los Angeles Subarea. Additionally, the Modified Project is consistent with the City’s goals of increasing housing in transit-rich areas near services, retail, and employment opportunities to reduce vehicles-per-miles traveled; increasing safe and healthy housing options downtown; and increasing the diversity of the housing stock. Therefore, the Modified Project is consistent with Central City development goals and growth projections and would not hinder the implementation of this objective.
To promote the development and rehabilitation of economic enterprises including retail, commercial, service, sports and entertainment, manufacturing, industrial and hospitality uses that are intended to provide employment and improve the Project Area’s tax base.	The Modified Project would provide up to 6,171 square feet of ground-floor retail and restaurant space, which would increase employment opportunities within Downtown and contribute to the Project Area’s tax base. Thus, the Modified Project, similar to the Original Project, is consistent with this objective.
To guide growth and development, reinforce viable functions, and facilitate the redevelopment, revitalization or rehabilitation of deteriorated and underutilized areas.	Similar to the Original Project, the Modified Project is consistent with this objective since it proposes the development of an underutilized site that is currently used as surface parking. The Modified Project has been designed with the guidance of applicable plans and design guidelines, City Planning Staff, and other City

Objective	Project Consistency Analysis
	departments as needed. Therefore, the Modified Project is consistent with this objective.
To create a modern, efficient and balanced urban environment for people, including a full range of around-the-clock activities and uses, such as recreation, sports, entertainment and housing.	The Modified Project, similar to the Original Project, would supplement the area with new residential units and ground-floor retail spaces. Additionally, the Project is designed to promote pedestrian activity with the retail stores' main entrances fronting the public right-of-way and providing night-time lighting for enhanced security. The Project's location near mass transit and in walking distance to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. Thus, the Modified Project is consistent with this objective.
To create a symbol of pride and identity which gives the Central City a strong image as the major center of the Los Angeles region.	Similar to the Original Project, the Modified Project would be consistent with this objective and preserve and contribute to the area's symbol of pride and identity by introducing high-density, high-rise development. Therefore, the Modified Project furthers the goals of this objective.
To facilitate the development of an integrated transportation system which will allow for the efficient movement of people and goods into, through, and out of the Central City.	This objective is directed towards City goals and does not specifically pertain to the Modified Project. The Project is placing new housing and retail space in a highly walkable and transit-rich area. As such, residents and employees of the Modified Project can easily move around the Central City area and greater Los Angeles region. Therefore, the Modified Project furthers the goals of this objective.
To achieve excellence in design, based on how the Central City is to be used by people, giving emphasis to parks, green spaces, streetscapes, street trees, and places designed for walking and sitting, and to develop an open space infrastructure that will aid in the creation of a cohesive social fabric.	The Downtown Design Guide and the Historic Downtown Los Angeles Design Guidelines direct the design of the Modified Project. The Original Project was not designed to satisfy the Downtown Design Guidelines. As such, the Modified Project would be consistent with the design and development goals of the Downtown Design Guideline, unlike the Original Project. As such, the Project would be attractively designed and landscaped. The Project would provide approximately 32,225 square feet in private and common open space to its residents, which would reduce the Modified Project's demand on local parks and open space. By providing on-site open space and the payment of the Dwelling Unit Construction Tax, the Project's impacts on local parks would be less than significant. The development of the Modified Project would be consistent with this objective.
To develop and implement public art into the urban fabric, integrating art into both public and private developments.	This objective is directed towards City goals and does not specifically pertain to the Modified Project. The Modified Project would be designed with the guidance of the Department of City Planning and applicable guidelines and plans.
To preserve key landmarks which highlight the history and unique character of the City, blending old and new in an aesthetic realization of change or growth with distinction, and facilitating the adaptive reuse of	The Project Site is currently used as a surface parking lot and no significant structures exist on-site. The Historic Assessment, included in Appendix H of this Addendum, found that the Modified Project would not have any

Objective	Project Consistency Analysis
structures of architectural, historic or cultural merit.	significant impact on historic resources. As such, the Modified Project, similar to the Original Project, would not significantly impact key landmarks and historical or unique features of the City, which would potentially hinder achievement of the goals of this objective.
To provide a full range of employment opportunities for persons of all income levels.	The Modified Project is consistent with this objective, as it provides ground-floor retail and restaurant space and would introduce new employment opportunities into the area. As such, the Project is consistent with this objective.
To provide high and medium density housing close to employment and available to all ethnic, social and economic groups, and to make an appropriate share of the City’s low- and moderate-income housing available to residents of the area.	Similar to the Original Project, the Modified Project’s mixed-use design locates high-density housing near many employment opportunities. Additionally, the ground-floor commercial and restaurant element provides additional employment opportunities in the Downtown area. The Project’s residential units and employment opportunities would be available to all ethnic, social, and economic groups without discrimination. As such, the Modified Project, similar to the Original Project, is consistent with this objective.
To provide the public and social services and facilities necessary to address the needs of the various social, medical and economic problems of Central City residents and to minimize the overconcentration or exclusive concentration of such services within the Project Area.	This objective is not specifically applicable to the Modified Project. The Modified Project has been designed and developed with the guidance of the Department of City Planning, and other necessary City departments. The Modified Project does not directly propose any public or social services and facilities.
To establish an atmosphere of cooperation among residents, workers, developers, business, special interest groups and public agencies in the implementation of this Plan.	This objective is directed toward City goals and is not specifically applicable to the Modified Project. The Modified Project would be designed and developed with the guidance of the Department of City Planning, and other necessary City departments. Additionally, the Modified Project has been designed in accordance with plans and design guidelines that have jurisdiction over the Project Site. As such, the Modified Project would be consistent with this objective.
<p><i>Notes:</i></p> <p>1. “Plan” used within this table means the City Center Redevelopment Plan.</p> <p>Source: City of Los Angeles, Redevelopment Plan For the City Center Redevelopment Project (Ordinance No. 174593), May 15, 2002</p> <p>Parker Environmental Consultants, January 2016.</p>	

In addition to the overall objectives of the Redevelopment Plan, above, the Redevelopment Plan establishes five criteria for residential uses within commercial areas, which includes mixed-use commercial and residential in a commercial zone. These criteria are:

1. Promote community revitalization;
2. Promote the goals and objectives of the Plan;
3. Be compatible with and appropriate for the Commercial uses in the vicinity;
4. Include amenities which are appropriate to the size and type of housing units proposed; and
5. Meet design and location criteria required by the [Community Redevelopment] Agency.

The Modified Project would be consistent with the criteria for residential uses in commercial areas. The Project would revitalize an underutilized lot with the development of a 27-story mixed-use building with ground-floor commercial space and residential units. The Project's land uses are consistent with the surrounding neighborhood that is highly characterized by mixed-use buildings. Additionally, the Project is consistent with the Project Site's zoning (C5-4D) and land use designation (regional center commercial). As such, the Project is compatible and appropriate for the commercial land uses located in the vicinity of the Project Site. Further, the Project would provide approximately 32,225 open space for the residents, which includes 15,150 square feet of private balconies and patios and 17,075 square feet in common open space. On-site amenities would include: Rooftop terrace, landscaping features, pool and spa with a pool deck, and outdoor seating. The Project is consistent with the LAMC requirements for open space. Thus, the Project would include amenities, which are appropriate to the size and type of housing proposed. The Redevelopment Plan refers to the applicable design guidelines for guidance in building design. The proposed building is designed with the guidance of these two documents (further discussed below). The Modified Project is compatible with the surrounding buildings by providing no setbacks from the public right-of-ways along S. Hill Street and W. 9th Street. Additionally, the Modified Project requests a TFAR approval of 49,999 square feet for the total square footage of 257,569 square feet, which is allowed pursuant to the Redevelopment Plan §512 and LAMC Section 14.5. The Project meets the design and location criteria required by the Community Redevelopment Agency and applicable guiding documents. Therefore, the Project is consistent with the Redevelopment Plan's criteria for mixed-use development and overall objectives (discussed in Table III-11).

Downtown Design Guide: City of Los Angeles

The Downtown Design Guide: City of Los Angeles (Design Guide) encourages Downtown Los Angeles to develop as a more sustainable and livable community. The focus of the Design Guide is on the relationship of buildings to the street, including sidewalk treatment, character of the building as it adjoins the sidewalk, and connections to transit. To achieve this harmony between buildings and public right-of-ways, the Design Guide provides design goals and specific requirements for the design of sidewalks and setbacks, ground floor treatment, parking and access, building massing and street wall, on-site open space, architectural detail, streetscape improvements, signage, and public art, and promote civic and cultural life. According to the Design Guide, the portion of W. 9th Street and S. Hill Street that border the Project Site are identified as retail streets. As depicted in Figure II-24, Basis of Design, and II-25, Design Guidelines Diagram, of the Project Description, the Modified Project conforms to the Design Guide. Building design guidelines that the Modified Project adheres to, but is not limited to, includes:³⁵

- *Recognize individual projects are the “building blocks” of great streets and neighborhoods. This requires particular attention to the way the building meets the sidewalk, providing a transition to pedestrian scale and elements that activate the street.*
- *Respect historically significant districts and buildings, including massing and scale, and*

³⁵ City of Los Angeles, Department of City Planning, *Downtown Design Guide*, June 15, 2009, pg. 7.

neighborhood context, while at the same time, encouraging innovative architectural design that expresses the identity of contemporary urban Los Angeles.

- *Accommodate vehicular access and parking in a way that respects pedestrians and public spaces and contributes to the quality of the neighborhood.*
- *Express an underlying design philosophy (a “big idea”) that is articulated and supported by all aspects of building design and initially conveyed through design sketches, drawings and specifications.*

Historic Downtown Los Angeles Design Guidelines

The purpose of the Historical Downtown Los Angeles Design Guidelines (Historic Design Guidelines) is to aid all parties embarking upon effective preservation and adaptive reuse projects in Los Angeles’ historic commercial center with design and development guidelines that help highlight and promote the historic character of the Historic Core. The Historic Design Guidelines serve as a tool to enhance economic activity and attract investment in the area by encouraging high quality, historically compatible design. The Historic Design Guidelines pertain to the area generally bound by the properties that front the north side of 3rd Street to the north, the properties that front the east side of Main Street to the east, the properties that front the south side of 9th Street to the south, and the properties that front the west side of Hill Street to the west. The Project Site is located on the southwestern side of the Historic Design Guideline’s defined area. Table III-12, below, provides a consistency analysis of the Modified Project with the applicable Design Guideline’s guidelines. While the Historic Design Guidelines are not a City adopted plan, and compliance with the Guidelines are voluntary, the Guidelines state that projects within the Historic Core should comply with the Historic Design Guidelines. Most of the Storefront Guidelines in the Historic Downtown Los Angeles Design Guidelines specifically pertain to existing building and historic structures in the Project area, although some guidelines may apply to new construction.

Los Angeles Municipal Code

The Modified Project would not conflict with the goals, objectives, and allowable land uses in the Central City Community Plan and the LAMC. The General Plan land use designation for the Project Site is Regional Center Commercial and the zoning designation is C5-4D, which allows for residential and commercial retail land uses. The Modified Project would be comprised of multi-family residential uses and retail uses. Residential uses are permitted on lots zoned for C5 uses that are located within the Central City CPA and the City Center Redevelopment Project Area. Therefore, the Modified Project would conform to the allowable land uses pursuant to the LAMC.

The Project Site consists of approximately 34,595 square feet of buildable lot area (0.79 acres). The lot area post-dedication is 31,467 net square feet (0.72 acres). The Project Site is currently improved with a paved surface parking lot. The Modified Project includes the construction of a 27-story (320 feet in height above grade) mixed-use apartment building with up to 305 apartments and 6,171 square feet of ground-floor retail and restaurant space.

**Table III-12
Project Consistency with Applicable
Guidelines of the Historic Downtown Los Angeles Design Guidelines**

Objectives	Project Consistency Analysis
<i>New Construction Key Points (Pages 11-12)</i>	
<ul style="list-style-type: none"> Priorities for new construction and additions include: build-to-the-street, particularly at corners; construct infill buildings at vacant or underutilized sites along major streets; and modify non-historic buildings so that they contribute visual interest and quality. 	<p>The Modified Project would convert an underutilized surface parking lot at the corner of a major intersection into a mixed-use building built to the street. The project’s compatible architectural design would enhance and complement the character of development in the immediate neighborhoods. The Modified Project’s ground floor retail and restaurant space would engage pedestrian activity in the area. As such, the Modified Project would be consistent with this guideline.</p>
<ul style="list-style-type: none"> Construct new buildings, of compatible design with the surrounding neighborhood, on existing surface parking lots. Corner sites, because of their importance in establishing the urban grid, should be a priority. 	<p>The Project Site is currently developed with a surface parking lot, which has been identified by the Historic Design Guidelines for infill development. The Historic Design Guidelines promote construction of new buildings that enhance the surrounding historical buildings and neighborhood with contemporary architecture. As depicted in Figure II-25, Design Guidelines Diagram, of the Project Description, the Project’s design is respectful of the bordering architecture and streetscape, and the Project’s design incorporates elements to create a continuous, engaging streetscape and street wall. Thus, the Modified Project would be consistent with this guideline.</p>
<ul style="list-style-type: none"> Encourage creative and innovative contemporary designs for new buildings in the Historic Downtown, especially on Broadway, where bold design will complement the exuberance of Broadway’s theaters. 	<p>While not on Broadway, the Modified Project would be contemporary in design and be clearly differentiated from its surrounding historic context. The Project’s podium would respond to its existing context, especially the sill and cornice lines of the adjacent historic Broadway Trade Center, as well as its rhythmic bay proportions, to carry a consistent scale throughout the block along 9th and Hill Streets. As such, the Modified Project would comply with this guideline.</p>
<ul style="list-style-type: none"> Consider the differences in character of the four major north-south streets in the study area (Hill, Broadway, Spring, and Main) when designing infill construction. 	<p>The façade of the building fronting Hill Street would be designed to complement the architecture of the historic buildings to the north, south and west, with design features that match the proportion, street wall, rhythm and scale of the historic building’s sill and cornice lines. As such, the Modified Project would comply with this guideline.</p>
<ul style="list-style-type: none"> Consider the differences in character of the four major north-south streets in the study area (Hill, Broadway, Spring, and Main) when planning for streetscape improvements. 	<p>The streetscape improvements on Hill Street would consider the surrounding context and nature of Hill Street and seek to enhance the pedestrian experience through the placement of the building’s main entry, short-term bicycle parking and ground floor retail and restaurant uses. As such, the Modified Project would comply with this guideline.</p>
<ul style="list-style-type: none"> Streetscape plays an important role in drawing individuals to a particular area of the city. Use 	<p>The Modified project would incorporate signage, lighting, and paving on 9th and Hill Streets to improve</p>

Objectives	Project Consistency Analysis
signage, lighting, and paving to improve the pedestrian experience.	the pedestrian experience, in addition to incorporating sidewalk dining and activating the street with neighborhood serving retail. As such, the Modified Project would comply with this guideline.
<ul style="list-style-type: none"> Reinforce the overall visual image and character of the Historic Downtown through way-finding signage. Information pertinent to the various BIDs should vary to strengthen identity, but still relate to an overall signage system. 	The Modified Project would enhance the overall visual image and character of the Historic Downtown area. The Applicant would cooperate with the Historic BID to place signage as appropriate and compliant with the LAMC to improve wayfinding signage. As such, the Modified Project would comply with this guideline.
Storefront Summary (Pages 47-48)	
<ul style="list-style-type: none"> Comply with the Los Angeles’ Municipal Code Signage Regulations. 	The Modified Project would comply with the LAMC Signage regulations.
<ul style="list-style-type: none"> Locate interior mechanical equipment away from the storefront glazing. Avoid dropped ceilings as they are visible from the street and hide original architectural features. 	Interior mechanical equipment would be located on the ground floor, away from storefront glazing. The Modified Project would comply with this guideline.
<ul style="list-style-type: none"> Avoid installing reflective or tinted glazing. 	All glazing on the Project would comply with the Title 24 Energy Standards of the California Code of Regulations, as well as the Los Angeles Green Building Code.
<ul style="list-style-type: none"> Utilize security grilles rather than solid roll-down doors because these have less impact on historic features. Protect and maintain the storefront with security systems appropriate for the historic materials present. 	The Modified Project would utilize the “Design Out Crime Guidelines: Crime Prevention Through Environmental Design” (specified by Mitigation Measure 69). The Modified Project would include security closures to the satisfaction of the Los Angeles Police Department. The Project’s security doors would be designed to minimize their visual impacts to the building’s aesthetics. Security doors would be visually screened from view during business hours to the maximum extent feasible. As such, the Modified Project would be consistent with this objective.
<ul style="list-style-type: none"> Maintain the building line, whether or not there is a physical storefront enclosure. 	As shown in Figure II-24 of the Project Description, the Modified Project would have no setback on W. 9 th Street and S. Hill Street. Along W. 9 th Street, the building would have a street wall of approximately 76 feet above grade, and along S. Hill Street, the building would have a street wall of approximately 76 feet above grade. The proposed building line and massing would be consistent with the surrounding neighborhood.
Storefront Signage (Pages 51- 54)	
<ul style="list-style-type: none"> Strive to make signs as unique as possible within the parameters of both these Design Guidelines and the City’s Signage Regulations. Design storefront signage so that it is lightweight in appearance. Signs made up of individual letters, square signs hung away from the face of the building, and signs perpendicular to the face of the building all tend to appear lighter than square signs affixed to the face of the building. Maintain a physical separation between individual store signs. Provide space between each individual 	The Modified Project would comply with the guidelines of the Historic Downtown Los Angeles Guidelines’ for signage.

<p>storefront’s signage, so that it is clear that the signs relate to a particular store directly below. Once the vertical divisions of a building’s storefront level are reintroduced, there will be clear separation between each store, and the storefront signs should fit within those divisions.</p> <ul style="list-style-type: none"> • Design signage to be as unique and distinctive as possible; differentiating a store from its neighbors is best achieved through signage. • Avoid covering architectural details or features with signs, including transom windows or vertical elements such as columns. • Scale signs to fit within the boundaries of the storefront that it is advertising. • Take immediate actions to comply with the City’s Signage Regulations. • Use neon and lit signage for Broadway, in keeping with its entertainment legacy. • Encourage use of a variety of lit signs – letter signs, perpendicular signs, vertical banners, and neon, down the length of Broadway or from store to store on one building – to highlight a dynamic atmosphere. 	
<p><i>Storefront Awning (Pages 55-58)</i></p>	
<ul style="list-style-type: none"> • Install simple and lightweight awnings. Awnings with open sides yield a lightweight presence and tend not to obscure building features. However, awnings with closed sides can be appropriate as well. • Limit signage on awnings to one sign per awning. One isolated sign advertises a store better than several signs. Lettering on the vertical drop of the awning is a clear and strong way to assert the store’s presence. • Consider how the spacing and size of awnings affect the appearance of the building as a whole as well as each individual storefront. • Awnings do not necessarily have to span the entire storefront to successfully highlight the storefront. 	<p>No awnings are proposed for the ground-floor retail and restaurant uses. Nevertheless, if awnings are incorporated in the future, the Modified Project would comply with the Historic Downtown Los Angeles Guidelines with respect to awnings.</p>
<p><i>Storefront Security Door (Pages 59-62)</i></p>	
<ul style="list-style-type: none"> • Avoid mounting security doors to storefront exteriors. • Mount perforated security doors on storefront interiors. 	<p>The Modified Project would be designed with the recommendations of the Los Angeles Police Department. Security doors would be visually screened from view during business hours to the maximum extent feasible. The Modified Project would comply with the Historic Downtown Los Angeles Guidelines’ requirements for security doors.</p>
<p><i>Storefront Lighting (Pages 63-64)</i></p>	
<ul style="list-style-type: none"> • Illuminate the storefront by way of exterior downlight fixtures or by illuminating the storefront glazing and transom area from within. • Hang lit or neon signs to further illuminate the storefront area. • Use lighting to highlight building elements of the 	<p>Exterior lighting may include walkway lighting, façade lighting, sign and display window illuminations, landscape lighting, streetscape lighting, and rooftop lighting. Exterior lighting would be used to enhance the character and architectural elements of the building and provide security and safety around the building. As</p>

<p>surrounding storefront, such as columns, the glazed bulkhead, or the underside of the storefront cornice, to draw attention to a store.</p>	<p>such, the Modified Project would be consistent with this objective.</p>
<p>Storefront Entrance (Pages 65-70)</p>	
<ul style="list-style-type: none"> • Use accent lighting to highlight monumental, ornamented entrances. • Where security closure is required, utilize grilles rather than solid panels. Grilles, if exposed, should be decorative metal, of a configuration suitable for the scale and design of the entrance. Alternatively, they may be simple metal grilles, installed in such a way to be fully concealed when open. 	<p>The Modified Project would utilize the “Design Out Crime Guidelines: Crime Prevention Through Environmental Design” (specified by Mitigation Measure 69). The Project would include security closures to the satisfaction of the Los Angeles Police Department. The Project’s security doors would be designed to minimize their visual impacts to the building’s aesthetics. As discussed above, lighting would be implemented throughout the Project to highlight architectural features, landscaping, and safety.</p>
<p>New/Infill Construction Guidelines (Pages 129-133)</p>	
<ul style="list-style-type: none"> • Consult with design professionals who have expertise in design within historic districts. 	<p>The Modified Project is professionally designed and would incorporate the design requirements of the applicable design guidelines and the recommendations of the City of Los Angeles Department of City Planning and other applicable City departments. Furthermore, the design team for the Modified Project consulted with the various City Agencies and Organizations, including: the Los Angeles Department of City Planning’s Urban Design Studio and Office of Historic Resources; the Los Angeles Conservancy; and the CRA/LA (a designated local authority and successor agency to the Community Redevelopment Agency of the City of Los Angeles). As such, the Modified Project would be consistent with this goal.</p>
<ul style="list-style-type: none"> • Consider the value of an existing building, even if it is not historic, and its potential for rehabilitation before making any decision to demolish and rebuild. 	<p>The Modified Project is located on a site that is currently developed with a surface parking lot. No buildings exist on-site. As such, the Modified Project would not conflict with this guideline.</p>
<ul style="list-style-type: none"> • Document existing signs and murals on building walls where they will be lost or covered due to new construction. 	<p>As seen in Figure II-4, Photographs of the Project Site, no murals or permanent signs exist on the adjacent buildings.</p>
<ul style="list-style-type: none"> • Construct new buildings, of compatible design with the surrounding neighborhood, on parking lot sites. Corner sites, because of their importance in defining the urban grid, should be the first priority for infill construction. 	<p>The Project Site is currently developed with surface parking, which has been identified by the Historic Design Guidelines for infill development. The Historic Design Guidelines promote construction of new buildings that enhance the surrounding historical buildings and neighborhood with contemporary architecture. As depicted in Figure II-25, Design Guidelines Diagram, of the Project Description, the Project’s design is respectful of the bordering architecture and streetscape, and the Project’s design incorporates elements to create a continuous, engaging streetscape and street wall. Thus, the Modified Project would be consistent with this objective.</p>

<ul style="list-style-type: none"> Pursue creative and innovative contemporary designs for new buildings in the Historic Downtown, especially on Broadway where bold design will complement the exuberance of the street’s historic theaters. 	<p>The Project Site is located approximately 160 feet west of Broadway. While not on Broadway, the Modified Project would be contemporary in design and be clearly differentiated from its surrounding historic context. The Project’s podium would respond to its existing context, especially the sill and cornice lines of the adjacent historic Broadway Trade Center, as well as its rhythmic bay proportions, to carry a consistent scale throughout the block along 9th and Hill Streets. Although the Project Site is not on Broadway, its close proximity to the street and contemporary design promote the goals of this guideline.</p>
<ul style="list-style-type: none"> Build consistently with the street wall, particularly at corner sites. 	<p>The Modified Project provides no setbacks from the public right-of-way on S. Hill Street and W. 9th Street, which is consistent with the buildings on both streets and in the Historic Downtown area. The Modified Project provides a continuous street wall to the maximum extent permitted by the existing dedications or surrounding streets. The façade of the building fronting both 9th and Hill Streets is designed to complement and respond to the architecture of its context with design features that match the proportion, street wall, rhythm and scale of the historic building’s sill and cornice lines.</p>
<ul style="list-style-type: none"> Design new buildings to respond to the existing building context within a block, and provide continuity to the overall streetscape. Frequently, a new building will be inserted on a site between two existing buildings of disparate scale and design. 	<p>The Project Site is on a corner lot. The proposed building provides a continuous street wall to the maximum extent permitted by the existing dedications or the surrounding streets and would enhance the streetscape. Additionally, the building’s scale and massing is respectful of surrounding buildings’ heights, scale, and massing.</p>
<ul style="list-style-type: none"> Use compatible types of masonry such as terra cotta when constructing new structures in the Historic Downtown. 	<p>Similar to the Original Project, the Modified Project is of a modern aesthetic and its façade would consist of creative and innovative contemporary design in the use of glass, precast concrete, metal panels, perforated metal screens and metal louvers.</p>
<ul style="list-style-type: none"> Employ durable, locally produced permanent, natural, and recycled materials in new construction. 	<p>The Applicant would make a good faith effort to employ durable, locally produced permanent, natural and recycled materials in new construction.</p>
<ul style="list-style-type: none"> Employ modern terrazzo as decorative paving in new construction projects. 	<p>While the Applicant would support this guideline, it is subject to review and approval by Bureau of Engineering and the Department of Public Works.</p>
<ul style="list-style-type: none"> Set back upper floors, especially when a taller building is permitted by code, so that dominant roof and cornice lines remain consistent along the street wall. 	<p>The Modified Project consists of a residential tower (approximately 320 feet in height) above a six level podium (approximately 76 feet in height). Currently, there is no consistent street wall due to the varying heights of neighboring structures at the intersection of 9th Street and Hill Street. Along W. 9th Street, the building would have a street wall of approximately 76 feet above grade, and along S. Hill Street, the building would have a street wall of approximately 76 feet above grade. As shown in Figure II-24, the proposed building’s east façade would be set back 46 feet from the Eastern-Columbia building at the podium level. It would be set back 81 feet at the 150-foot level, and 176 feet from the Eastern Columbia clock tower at the 200-foot level. The Modified Project’s podium would respond to its existing context, especially the sill</p>

	<p>and cornice lines of the adjacent historic Broadway Trade Center, as well as its rhythmic bay proportions, to carry a consistent scale throughout the block along 9th and Hill Streets. The tower spacing distance would provide a substantial setback between the two buildings along 9th Street, and the wider sidewalk would allow the views of the Eastern Columbia Building’s iconic massing and highly decorated south-facing façade to remain intact while retaining its visual prominence.</p>
<ul style="list-style-type: none"> Explore options for multi-use buildings, combining residential, commercial, and other compatible uses where appropriate. 	<p>The Modified Project would be consistent with this guideline, as the Project is a mixed-use residential and commercial development.</p>
<ul style="list-style-type: none"> Provide multi-tenant retail space and other public uses at the street level. These should be accessible directly from the sidewalk, rather than through common interior lobbies. 	<p>The Modified Project provides up to 6,171 square feet of ground-floor retail and restaurant space that is accessible directly from the sidewalk. As such, the Project would be consistent with this goal. Refer to Figure II-8, Ground Floor Plan.</p>
<ul style="list-style-type: none"> When developing vacant sites, consider incorporating through-block public arcades or “paseos,” like those of the Broadway-Spring Arcade or the Grand Central Market. Arcades encourage pedestrian movement across the downtown area and provide opportunities for burgeoning retail businesses in an open market-like venue. 	<p>The Modified Project has considered incorporating through-block public arcades or “paseos” into the design. The Modified Project would not include the development of a paseo as the existing Eastern Columbia Building and it’s free standing parking garage, to the east of the Project Site, would physically block the ability to have a paseo that connects S. Hill Street and Broadway.</p>
<ul style="list-style-type: none"> Provide easy-to-locate building entrances on all street-facing facades. 	<p>The Modified Project would provide easy-to-locate building entrances to the retail shops on all street-facing facades, as well as the residential lobby entrance at Hill Street. Entrances would be highlighted with signage and lighting. Thus, the Modified Project would be consistent with this guideline.</p>
<ul style="list-style-type: none"> Where a building extends through an entire block or is located at a corner, connect its entrances with a suitably scaled public lobby. Highlight entrances with signage and lighting to distinguish them from storefronts. 	<p>The Modified Project is located on a corner and the suitably scaled lobby is accessed mid-block at Hill Street. Its entrance would be demarcated by specific building features, lighting and signage different from retail signage.</p>
<ul style="list-style-type: none"> Design infill parking structures with retail use at the street level, when practical. Facades of parking structures that face public streets should be designed to the same standards as any other new construction, with particular attention to fenestration. 	<p>The Project includes 336 parking spaces that would serve the residential uses on-site. Parking would be provided in one subterranean level, at grade and levels two through five. The street level of the structure includes up to 6,171 of ground-floor retail and restaurant space. Level five would support additional parking behind habitable space fronting Hill Street and 9th Street. The Modified Project would include a comprehensive podium-screening program that would incorporate precast concrete framing metal panels and vertical louvers along 9th Street and Hill Street to integrate the parking levels with the habitable space above. The design of these levels would also carry the scale and rhythm of the adjacent Broadway Trade Center building through the block. As shown in Figure II-23, Enlarged Podium and Screening Diagram and Wall Sections, the Modified Project would enclose the eastern portion of the podium directly facing the adjacent Eastern Columbia building and approximately 63.5 feet of the</p>

	portion of the podium facing the adjacent parking garage. Thus, the Modified Project would be consistent with this guideline.
<ul style="list-style-type: none"> New infill parking structures should have minimal curb cuts on major thoroughfares; encourage parking structure entries at side streets. 	Vehicular access to the site would be from one entrance on Hill Street and one entrance on 9 th Street. Similar to the Approved Project, the project would not be adding additional curb cuts to these streets as they currently exist on both streets.
<ul style="list-style-type: none"> Consider locating entrances to and exits from parking structures in alleys or the numbered side streets because these access points are inappropriate along primary pedestrian routes, for both visual and safety reasons. 	The Modified Project includes two driveways into the on-site parking facility. One driveway would be located off of S. Hill Street and one driveway would be located off 9 th Street. Both driveways would be designed to minimize its visual and safety impacts to traffic and pedestrians.
<ul style="list-style-type: none"> Consider the differences of the four major north south streets in the study area (Hill, Broadway, Spring and Main) when designing infill construction. 	S. Hill Street borders the Project Site to the west. Along, S. Hill Street, the Modified Project includes ground-floor retail and restaurant space with street access, residential lobby access, and the access to the parking garage. The façade of the building fronting Hill Street is designed to complement the architecture of the historic buildings to the north, south and west, with design features that match the proportion, street wall, rhythm and scale of the historic building’s sill and cornice lines. The Modified Project street wall would be consistent with buildings along S. Hill Street and in the vicinity of the Modified Project. As such the Modified Project would be consistent with this guideline.
<i>Infill Construction Interim Guidelines (Page 133)</i>	
<ul style="list-style-type: none"> Keep properties clean; do not allow debris or graffiti to accumulate. 	The Modified Project would be kept clear and free of debris and graffiti during the construction and operation of the Project. Implementation of Mitigation Measure 1 would ensure that the property is kept in good repair.
<ul style="list-style-type: none"> Provide screening or enhancements (trees, planters, attractive fences) along sidewalk sides of parking lots. 	The Modified Project replaces an existing surface parking lot screened by metal fencing with ground floor retail and other active uses for the first 18 feet of building. The Modified Project provides 4 levels of parking above ground floor retail. The parking podium would be screened from view from sidewalks with a variety of material treatments (precast concrete, vertical louvers, perforated metal panels, and window wall system). The Modified Project includes approximately 6,171 square feet of ground floor retail, approximately 18 feet in height that would activate the street. Furthermore the Modified Project would consist of wide sidewalks, especially on 9 th Street (22 feet), and provide landscaping, which together would further enhance the pedestrian experience.
<ul style="list-style-type: none"> Construct graphically interesting and informative banners along sidewalks during construction; maintain these throughout the duration of construction. 	To the extent permitted by the LAMC, the Modified Project would comply with this guideline.
<i>Streetscape (Page 145-154)</i>	
Lighting	
<ul style="list-style-type: none"> Consider energy conservation when designing lighting. LED (light emitting diodes) street and pedestrian lighting should be used to improve 	All streetscape and pedestrian lighting incorporated in the project would use energy conserving infrastructures, including LEDs, which would also improve lighting levels.

both lighting levels and conserve energy.	
<ul style="list-style-type: none"> Uplight street trees or use string lights in trees to add lighting and animation to the street. 	While the Applicant would support this guideline, it is subject to approval from various other Departments, including the Department of Urban Forestry, Department of Street Lighting, Bureau of Engineering and Dept. of Public Works.
Hill Street Subarea Guidelines	
<ul style="list-style-type: none"> Continue to emphasize the existing architectural rhythms with infill projects in Hill Street’s vacant lots. There are currently three large vacant lots around or near Pershing Square. The solidity of the street walls bordering urban open spaces aids in defining the edges of the open space. Likewise, development of the lots surrounding Pershing Square would further define not only the park, but also the architectural rhythms of Hill Street’s streetscape. 	The façade of the building fronting Hill Street is designed to complement the architecture of the historic buildings to the north, south and west, with design features that match the proportion, street wall, rhythm and scale of the historic building’s sill and cornice lines, further defining the architectural rhythms of Hill Street’s streetscape.
<ul style="list-style-type: none"> Encourage the scale of redevelopment to be similar to that of the surrounding Hill Street extant buildings. It is important that the cornice lines of new buildings and historic buildings correspond or align in some way. 	The façade of the building fronting Hill Street is designed to complement the architecture of the historic buildings to the north, south and west, with design features that match the proportion, street wall, rhythm and scale of the historic building’s sill and cornice lines.
<ul style="list-style-type: none"> Minimize the introduction of street trees along Hill Street because they are not an historic feature. When choosing street trees, it is important to select a species whose mature canopy will not obscure architectural features. 	The Modified Project would not introduce street trees along Hill Street. Therefore, the Modified Project would be consistent with this guideline.
<p><i>Source: City of Los Angeles, Historic Downtown Los Angeles Design Guidelines, July 2002; Parker Environmental Consultants, February 2016; and Craig Lawson and Co., February 2016.</i></p>	

Floor Area

The Project Site is zoned C5-4D with the land use designation of Regional Center Commercial. The corresponding zones for Regional Center Commercial are the CR, C1.5, C2, C4, C5, R3, R4, R5, RAS3 and RAS4 Zones. Height District No. 4 does not specify a building height limit. Per the LAMC and Redevelopment Plan, the Project Site’s C5-4D zone designation allows 13:1 with Transfer of Floor Area Rights (TFAR) and 6:1 without TFAR. The Applicant proposes a TFAR approval of 49,999 square feet to permit a total FAR of approximately 7.45 times the buildable area of the site.

The Project Site is 34,595 square feet, prior to the loss of area to dedication. The lot area post-dedication is 31,467 net square feet (0.72 acres). Upon approval of a TFAR, which would add 49,999 square feet to the buildable area on-site, the total projected square footage would be 257,569 square feet. The addition of 49,999 square feet to the buildable area would result in an FAR of 7.45:1. Thus, the increase in floor area is consistent with the City Center Redevelopment Plan and the Central City Community Transfer of Floor Area Rights.

Density

Per the Greater Downtown Housing Incentive Area, LAMC Section 12.22 C.3(c), the maximum number of dwelling units or guest rooms permitted shall not be limited by the lot area provisions of this chapter so long as the total floor area utilized by guest rooms does not exceed the total floor area utilized by the dwelling units. The Project Site would be developed with up to 305 residential units and no guest rooms. Thus, the Modified Project is consistent with this requirement.

Open Space

As shown in Table II-2 in Section II, Project Description, the Modified Project would be in compliance with the minimum open space requirements of the LAMC. The Modified Project would include approximately 32,225 square feet of open space, which includes 17,075 square feet of common open space and 15,150 square feet of private open space. The total amount of open space required by code is approximately 32,225 square feet. As part of the open space requirements, the residential component of the Project includes planting trees at a rate of one tree for every four dwelling units. 76 trees are proposed on-site, which is consistent with LAMC requirements. Thus, the Modified Project would be consistent with the open space requirements of the LAMC.

Parking

As discussed previously in this Section, the Modified Project meets all of the requisite criteria of a Transit Oriented Infill Project pursuant to SB 743. SB 743, now codified as law under Public Resources Code 21099 provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Accordingly, the Modified Project’s parking impacts shall not be considered significant impacts on the environment as a matter of law under Public Resources Code Section 21099. The following impact discussion is provided for informational purposes only.

Parking for the retail and residential uses on-site would be provided in one subterranean level, at grade and levels two through five. Level five would support additional parking behind habitable space fronting Hill Street and 9th Street. As summarized in Table II-3, in the Project Description Chapter, the Modified Project would meet the minimum on-site parking requirements of the LAMC. The Modified Project would require a total of 321 residential parking spaces. The Modified Project plans to provide 336 residential parking spaces.

The Project Site is located within the Central City Parking Exception area (LAMC Section 12.21 A 4 (p)), which permits one (1) space for each dwelling unit, except where there are more than six (6) dwelling units of more than three (3) habitable rooms per unit on any lot, the ratio of parking spaces required for all of such units shall be at least one and one-quarter (1¼) parking spaces for each dwelling unit of more than three (3) habitable rooms. Additionally, pursuant to the Downtown Business parking Exception (LAMC Section 12.21A.(4)(i)(3)), no parking is required for retail spaces less than 7,500 square feet.

The Modified Project would also provide the required amount of on-site bicycle parking in bicycle storage spaces located on Level 1 pursuant to the City of Los Angeles Bicycle Ordinance (Ord. 182386). Pursuant to LAMC Section 12.21 A.16, the Modified Project is required to supply 34 short-term bicycle parking spaces and 308 long-term bicycle parking spaces, for a total of 342 bicycle parking spaces. The Modified Project proposes to provide 343 spaces, unlike the Original Project, which did not provide any bicycle parking. Thus, the Project would be consistent with the LAMC requirements for vehicle and bicycle parking.

Mitigation Measures 46 and 47 of the Original Project have been included in this Addendum. Mitigation Measure 46 and 47 have been updated to reflect that the Modified Project no longer includes a Tract Map and that through demonstration of consistency with the applicable plans, goals and objectives, as identified in the mitigation outlined below, impacts resulting from the discretionary approvals requested by the Modified Project would be less than significant.

Mitigation Measures:

46. ~~Prior to recordation of the final tract map for the proposed project, Zoning Administrator Case No. 66505 shall be approved~~ Prior to the issuance of the Modified Project's building permits, the Modified Project shall demonstrate to the satisfaction of the Planning Department ~~as needed to assure~~ consistency with the goals and objectives of the City of Los Angeles General Plan, the Central City Community Plan and the requirements of the City of Los Angeles Zoning and Municipal Codes.
47. ~~Prior to recordation of the final tract map, the proposed project~~ Prior to issuance of the Modified Project's building permits, the Modified Project shall demonstrate that it fully meets the requirements of the Community Redevelopment Agency as needed to assure consistency with the goals and objectives City Center Redevelopment Plan.

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

Original Project

No Impact. Since no habitat conservation plans or natural community conservation plans would apply to the Project Site or the surrounding area, the Original Project would not conflict such plans. Therefore, the Original Project would have no impact with respect to any habitat conservation plans.

Modified Project

No Impact. As discussed in Section 4(f) above, no such plans presently exist which govern any portion of the Project Site. Further, the Project Site is located in a highly urbanized area, and the Project Site is currently developed with a paved surface parking lot. Therefore, the Modified Project would not have the potential to cause such effects.

Cumulative Impacts

No Impact. Development of any related project is expected to occur in accordance with adopted plans and regulations. It is also expected that most of the related projects would be compatible with the zoning and land use designations of each related project site and its existing surrounding uses and would not disrupt or divide the physical arrangement of the established community. In addition, it is reasonable to assume that the related projects under consideration would implement and support local and regional planning goals and policies. Therefore, the Modified Project's land use impacts would not be cumulatively considerable since the Modified Project would not conflict with applicable local or regional plans. The Modified Project's land use would not create any significant impacts.

XI. MINERAL RESOURCES

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

A significant impact may occur if a project site is located in an area used or available for extraction of a regionally-important mineral resource, or if the project development would convert an existing or future regionally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering: (a) whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone MRZ-2 zone or other known or potential mineral resource area, and (b) whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

Original Project

No Impact. No mineral resources are known to occur within the Project Site. The site is not located within an identified Mineral Resource Zone (MRZ) as determined by the CDMG or as designated by the Conservation Element of the City of Los Angeles General Plan, nor is it in an "0" (Oil Drilling) District, City-designated Oil Drilling/Surface Mining Supplemental Use District, or City-designated Oil Field/Drilling Area. Therefore, development of the Original Project would not result in the loss or non-availability of any known, regionally valuable mineral resource and no impact would occur.

Modified Project

No Impact. The Project Site is not located within the Los Angeles Downtown Oil Field and Oil Drilling/Surface Mining Supplemental Use District, or an Oil Field/Drilling Area. The Project Site is currently developed with a surface parking lot. The Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Site has been historically used for the extraction of mineral resources. Therefore, the development of the Modified Project would not result in

the loss of availability of a known mineral resource and no impact would occur.

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

A significant impact may occur if the project site is located in an area used or available for extraction of a regionally-important mineral resource, or if the development would convert an existing or future regionally-important mineral extraction use to another use, or if the development would affect access to a site used or potentially available for regionally-important mineral resource extraction.

Original Project

No Impact. No designated resources are located within the site boundaries or the project area. The Original Project would not directly or indirectly impact any known oil drilling activities or facilities in the surrounding area. Therefore, development of the Original Project would not result in the loss or non-availability of any known, locally valuable mineral resource.

Modified Project

No Impact. Similar to the Original Project, the Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has historically been used for the extraction of mineral resources. Therefore, no impact to locally important mineral resources would occur.

XII. NOISE

Fundamentals of Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady “background” noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people

is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

- L_{eq} – An L_{eq} , or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
- L_{max} – The maximum instantaneous noise level experienced during a given period of time.
- L_{min} – The minimum instantaneous noise level experienced during a given period of time.
- CNEL – The Community Noise Equivalent Level is a 24-hour average L_{eq} with a 5 dBA “weighting” during the hours of 7:00 P.M. to 10:00 P.M. and a 10 dBA “weighting” added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24 hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most would accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

It is widely accepted that in the community noise environment the average healthy ear can barely perceive CNEL noise level changes of 3 dBA. CNEL changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dBA CNEL increase is readily noticeable, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound.

Noise levels from a particular source generally decline as distance to the receptor increases. Other factors, such as the weather and reflecting or barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically “hard” locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically “soft” locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations,

respectively. In addition, noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures – generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The normal noise attenuation within residential structures with open windows is about 17 dBA, while the noise attenuation with closed windows is about 25 dBA.³⁶

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

A significant impact may occur if the Proposed Project would generate excess noise that would cause the ambient noise environment at the Project Site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance).

Regarding construction, the LAMC indicates that no construction or repair work shall be performed between the hours of 9:00 p.m. and 7:00 a.m. the following day, since such activities would generate loud noises and disturb persons occupying sleeping quarters in any adjacent dwelling, hotel, apartment or other place of residence.³⁷ No person, other than an individual home owner engaged in the repair or construction of his/her single-family dwelling, shall perform any construction or repair work of any kind or perform such work within 500 feet of land so occupied before 8:00 a.m. or after 6:00 p.m. on any Saturday or on a federal holiday, or at any time on any Sunday. Under certain conditions, the city may grant a waiver to allow limited construction activities to occur outside of the limits described above.

The LAMC also specifies the maximum noise level of powered equipment or powered hand tools.⁵⁵ Any powered equipment or hand tool that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet is prohibited. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment.

Regarding operations, a significant operational impact would result if the Modified Project causes the ambient noise level measured at the property line of the affected uses to increase by three decibels (CNEL) to 70 dBA or greater or any five decibel or more increase in noise level.³⁸

³⁶ *National Cooperative Highway Research Program Report 117, Highway Noise: A Design Guide for Highway Engineers, 1971.*

³⁷ *See LAMC, Chapter IV, Article 1, Section 41.40, and LAMC Chapter XI, Article 2, Section 112.04.*

³⁸ *City of Los Angeles LA CEQA Thresholds Guide (2006).*

Original Project

The 2007 IS/MND identified the Eastern Columbia Tower residential building located approximately 40 feet east of the Project Site and additional multi-family residential uses in the project vicinity as noise sensitive receptors. In the 2007 IS/MND, the existing noise environment of the project area and its vicinity were characterized by vehicular traffic and noises typical to a dense urban area (e.g., people conversing). Vehicular traffic was the primary source of noise in the project vicinity. Ambient noise measurements taken in 2006 were used to establish existing ambient noise conditions and to provide a baseline for evaluating construction noise impacts. The ambient noise levels ranged between 67.9 and 75.5 dBA (L_{eq}).

Construction Impacts

Potentially Significant Unless Mitigation Incorporated. The 2007 IS/MND addressed the construction activities as requiring the use of numerous noise generating equipment, such as jack hammers, pneumatic impact equipment, saws, and tractors. Table III-13 identifies noise levels associated with various stages of construction activity. As shown, the highest noise levels are expected to occur during the grading/excavation and finishing phases of construction, which would generate a noise level of 89 dBA at a reference distance of 50 feet. However, noise levels would fluctuate depending on construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers.

Table III-13
Outdoor Construction Noise Levels

Construction Phase	Noise Levels at 50 Feet (dBA L_{eq})
Ground Clearing	84
Excavation, Grading	89
Foundations	78
Structural	85
Finishing	89

Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971. (see Table III-8 in the 2007 IS/MND)

The 2007 IS/MND concluded that construction activity would occur approximately 40 feet from the Eastern Columbia residential tower. These residences could experience an exterior noise level of 91 dBA, which is approximately 17 dBA higher than the existing ambient noise level. Typical building construction provides a noise reduction of approximately 12 dBA with windows open and a minimum 26 dBA with windows closed.³⁹ As such, interior noise levels at the Eastern Columbia residential tower could reach 65 dBA. The 2007 IS/MND noted that construction activity would occur for short-time periods during the day and would not occur within noise sensitive hours (10 PM to 7 AM).

³⁹ American Society for Testing of Materials, *Standard Classification for Determination of Outdoor-Indoor Transmission Class*, 2003.

The 2007 IS/MND also noted that the project would include excavation for project parking. The excavated area would serve as a noise barrier to street-level sensitive receptors during the excavation process. In addition, the structural framing and the exterior skin would be completed as quickly as possible. As a result, the majority of construction activity would take place within a concrete structure and would not substantially raise interior noise levels within the Eastern Columbia residential tower.

The noise limitation of the LAMC does not apply where compliance is technically infeasible.⁴⁰ “Technically infeasible” means that the noise standard cannot be met despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of equipment. The following mitigation measures would reduce construction noise to the greatest extent feasible. Mitigation measure 48 would reduce construction noise levels by five to ten dBA. The other mitigation measures would assist in attenuating construction noise levels. The noise disturbance coordinator (mitigation measure 54) would ensure that any noise complaints would be resolved. In addition, construction activity would be temporary and intermittent. With implementation of mitigation measure 48 through 54, construction noise would result in a less-than-significant impact.

Mitigation Measures:

48. Construction contracts shall specify that all construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.
49. Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).
50. Equipment staging areas shall be located on the western portion of the project site as far as possible from the Eastern Columbia residential tower to the east.
51. Construction activity involving structural framing and the application of the exterior skin shall be limited to the hours of 9:00 a.m. to 3:00 p.m.
52. During construction activity, the applicant shall periodically conduct 24-hour noise monitoring within Eastern Columbia residential tower dwelling units facing the project site or along the western façade of the Eastern Columbia residential tower. Additional mitigation shall be implemented for residential units if exterior noise levels exceed 71 dBA CNEL or interior noise levels exceed 45 dBA CNEL. These mitigation measures may include, but are not limited to, installation of temporary vertical sheeting at sensitive points to provide greater noise attenuation and further limitations to the construction schedule.
53. All residential units located within 2,000 feet of the construction site shall be sent a notice regarding the construction schedule of the proposed project. A sign, legible at a distance of 50

⁴⁰ LAMC Section 122.05

feet shall also be posted at the construction site. All notices and the signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.

54. A “noise disturbance coordinator” shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and would be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 1,000 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.

Operational Impacts

Less Than Significant Impact. Operational noise sources associated with Original Project include mobile and stationary (i.e., mechanical equipment and parking activity) sources. To ascertain mobile noise impacts, traffic in the 2007 IS/MND was modeled under future year (2008) No Project and With Project conditions utilizing Federal Highway Administration RD-77-108 noise calculation formulas. The 2007 IS/MND concluded the greatest project-related noise increase would be 0.2 dBA CNEL and would occur along Broadway between 8th and 9th Streets. The roadway noise increase attributed to the Original Project would be less than the three dBA CNEL increment at all analyzed segments. As such, there would not be a perceptible change in audible noise as a result of increased traffic. The 2007 IS/MND concluded the Original Project would result in a less than significant mobile noise impact.

Modified Project

Potentially Significant Unless Mitigation Incorporated. Implementation of the Proposed Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail below. However, construction and operational noise impacts would be substantially similar to the findings in the 2007 IS/MND and, similar to the conclusion presented in the 2007 IS/MND impacts would be reduced to less than significant levels with implementation of project mitigation measures and compliance with the applicable LAMC Code requirements governing the permissible hours of construction. Operational noise levels would be less than significant with project design features. The following information and analysis addresses changes to the environmental conditions relative to ambient noise levels and addresses the proposed changes to the Original Project’s design.

Ambient Noise Levels

To assess the existing ambient noise conditions in the Project area, ambient noise measurements were taken with a Larson Davis 831 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2001) - American National Standard Specification for Sound Level Meters. Figure III-27, Noise Monitoring and Sensitive Receptor Location Map, depicts the noise measurement locations fronting the adjacent residential uses as the most likely sensitive receptors to experience noise level

increases during construction. The detailed noise monitoring data are presented in Appendix E, Noise Monitoring Data, and are summarized in Table III-14, Existing Ambient Daytime Noise Levels in Project Site Vicinity. As shown in Table III-14, the ambient noise in the vicinity of the Project Site ranges from 67.2 to 69.4 L_{eq} . The maximum noise level during three 15-minute recordings was 82.3 dB L_{max} . For comparative purposes, the ambient noise levels recorded in the 2007 IS/MND fell within a range of 67.9 dBA L_{eq} and 75.5 dBA L_{eq} . The primary noise source at all three locations was vehicle traffic along Hill Street and 9th Street. Pedestrian traffic also contributed to the ambient noise levels, though to a lesser extent than the vehicle noise. As noted in Table III-14, the predominant noise sources in the area are associated with vehicular traffic and pedestrian activity on the sidewalks and surface parking lots. The Project Site is currently operating as a surface parking lot and as such, contributes to the ambient noise level associated with cars entering and leaving the site, doors closing, and occasional car alarms during the daytime and evening hours.

Table III-14
Existing Ambient Daytime Noise Levels in Project Site Vicinity

No.	Location	Primary Noise Sources	Noise Level Statistics ^a		
			L_{eq}	L_{min}	L_{max}
1	Northwest corner of Project Site on Hill Street	Vehicular traffic, pedestrian activity.	69.4	59.1	78.9
2	Southwest corner of Project Site, at the northeast corner of the intersection at W. 9 th Street and Hill Street.	Vehicular traffic, pedestrian activity.	67.2	58.0	82.3
3	Southeast corner of Project Site on W. 9 th Street.	Vehicular traffic, pedestrian activity.	68.0	57.0	81.2

^a Noise measurements were taken on November 5, 2014 at each location for a duration of 15 minutes. See Appendix E of this IS/MND Addendum for noise monitoring data sheets.





Sensitive Receptors

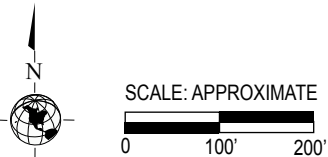
Several noise sensitive land uses are located adjacent to and in the vicinity of the Proposed Project. For purposes of assessing noise impacts on sensitive populations, the following sensitive receptors in proximity to the Project Site were identified:

1. 849 S. Broadway, Eastern Columbia Bldg. (mixed-use multi-family residential land uses);
2. 200 W. 9th Street, Blackstone Apartments (multi-family residential);
3. 301 W. Olympic Blvd. and 915-955 Hill Street, Hanover Olympic and Hill Apartments (mixed-use multi-family residential land uses);
4. 321 W. 9th Street (Onni 9th and Olive) (mixed-use multi-family residential land uses);
5. 820 S. Olive Street (Onni) (mixed-use multi-family residential land uses).

The locations of these land uses relative to the Project Site are depicted in Figure III-27, Noise Monitoring and Sensitive Receptor Location Map. Photographs of the land uses immediately surrounding the Project Site are provided in Figure II-5, Photographs of the Surrounding Land Uses. For purposes of

LEGEND:

-  Project Site
-  Noise Monitoring Locations
-  Commercial Uses
-  Noise and Vibration Sensitive Receptors:
- ① Multi-Family (Under Construction)
- ② Multi-Family
- ③ Multi-Family
- ④ Multi-Family (Approved)
- ⑤ Multi-Family
- ⑥ Commercial (Built in 1932)
- ⑦ Multi-Family
- ⑧ Multi-Family
- ⑨ Multi-Family
- ⑩ Multi-Family
- ⑪ Multi-Family



Sources: Google Earth, 2015; ZIMAS, 2015; Historic Places LA, 2015

assessing construction-generated vibration impacts, the Eastern Columbia building located directly to the east of the Project Site and the Broadway Trade Center Building located at 801 S. Broadway were identified as buildings that are particularly susceptible to vibration impacts. Although not a sensitive noise receptor, the structure adjoining the Project Site's northerly property line is considered a sensitive receptor for vibration impacts, as it is an older structure and is susceptible to damage from groundborne vibration impacts during construction.

Construction Noise

Construction activities for the Modified Project would be as described for the Original Project in the 2007 IS/MND. Construction activities would require the use of heavy equipment for demolition/site clearing, grading and site preparation, and building construction. Using the same U.S. EPA compiled construction activity noise data presented in the 2007 IS/MND regarding the noise generating characteristics of specific types of construction equipment and typical construction activities, the residents within the Eastern Columbia Lofts Building could experience an exterior noise level of 91 dBA, which is approximately 23 dBA higher than the existing L_{eq} ambient noise level. As compared to the highest ambient L_{max} noise levels recorded adjacent to the Eastern Columbia Lofts Building, construction noise levels would be 9.8 dBA higher than the recorded L_{max} . While construction activities associated with the Modified Project would be expected to generate similar noise levels to those that were disclosed in the 2007 IS/MND, the duration of construction would be limited to 24-months as opposed to the 32-month construction period previously anticipated under the Original Project. The construction activities would also require less grading and soil export, as the Modified Project proposed one less level of subterranean parking than what was proposed under the Original Project. Similar to the conclusion in the 2007 IS/MND, the Applicant would comply with all applicable noise regulations, and would implement the construction noise mitigation measures identified below (see Mitigation Measures 48 through 54, below). Implementation of these mitigation measures would reduce the noise levels associated with construction of the Proposed Project to the maximum extent that is technically feasible so as to reduce the construction duration and number of days that could exceed ambient noise levels. As a result of construction duration changes, Mitigation Measure 51 of the Original Project has been modified to allow structural framing and application of exterior skin facing the Eastern Columbia Tower at the easterly property line to be limited to the hours of 8:00 a.m. to 6:00 p.m. Because technically feasible sound attenuation measures will be required and the modified hours of construction are (1) permissible by the LAMC and (2) would result in a shorter overall construction period, thereby minimizing the duration of construction-related noise impacts (See Appendix E of this IS/MND Addendum), the revised mitigation measure would ensure a less than significant impact.

Thus, based on the provisions set forth in LAMC Sec. 112.05, implementation of Mitigation Measures 48 through 54 would ensure impacts associated with construction-related noise levels are mitigated to the maximum extent feasible and temporary construction-related noise impacts would be considered less than significant in accordance with City requirements and standards.

Mitigation Measures:

48. Construction contracts shall specify that all construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.
49. Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).
50. Equipment staging areas shall be located on the western portion of the project site as far as possible from the Eastern Columbia residential tower to the east.
51. Construction activity involving structural framing and the application of the exterior skin shall be limited to the hours of ~~9:00 a.m. to 3:00 p.m.~~ 8:00 a.m. to 6:00 p.m.
52. During construction activity, the applicant shall periodically conduct 24-hour noise monitoring within Eastern Columbia residential tower dwelling units facing the project site or along the western façade of the Eastern Columbia residential tower. Additional mitigation shall be implemented for residential units if exterior noise levels exceed 71 dBA CNEL or interior noise levels exceed 45 dBA CNEL. These mitigation measures may include, but are not limited to, installation of temporary vertical sheeting at sensitive points to provide greater noise attenuation and further limitations to the construction schedule.
53. All residential units located within ~~2,000~~ 500 feet of the construction site shall be sent a notice regarding the construction schedule of the proposed project. A sign, legible at a distance of 50 feet shall also be posted at the construction site. All notices and the signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.
54. A “noise disturbance coordinator” shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and would be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within ~~1,000~~ 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.

Justification for Modified Mitigation Measures

Mitigation Measures 53 and 54 of the 2007 IS/MND are suggested to be modified as part of this Addendum. Mitigation Measure 53 of the Original Project states that all residential units located within 2,000 feet of the construction site shall be sent a notice regarding the construction schedule of the project. Mitigation Measures 53 has been updated so that the radius of the construction notice is 500 feet. This change is justified because construction noise would not be audible beyond 500 feet of the Project Site. The buildings located within the first 500 feet of the Project Site would effectively block the line of sight

and attenuate the construction noise levels at receptors located farther than 500 feet to below ambient noise levels. For every row of buildings, the noise level emanating from the source would be reduced by 10 dBA. Thus, construction noise levels at a sensitive receptor two buildings away would essentially experience a 20 dBA attenuation rate and would be below ambient noise levels (See Appendix E, Construction Noise and Distance Attenuation, Technical Memorandum). Additionally, Mitigation Measure 54 of the Original Project states that all residential units located within 1,000 feet of the construction site shall list the telephone number for the disturbance coordinator. Mitigation Measures 54 has been updated so that the radius of the construction notice is 500 feet. Further, although not discussed in the 2007 IS/MND, City of Los Angeles Ordinance No. 178048 requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice is required to be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public. Pursuant to LAMC Section 41.40, exterior demolition and construction activities that generate noise are prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. Demolition and construction are prohibited on Sundays and all federal holidays. All construction activities associated with the Proposed Project would comply with these LAMC requirements. Furthermore, the Modified Project would be required to comply with Regulatory Compliance Measure RC-NOISE-1 to further reduce impacts associated with construction noise of the Modified Project.

Regulatory Compliance Measures:

RC-NOISE-1 Increased Noise Levels (Demolition, Grading, and Construction Activities)

- Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday.
- To the maximum extent practical, demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with technically feasible noise shielding and muffling devices in compliance with LAMC Sec. 112.05.

Operational Noise

Traffic Noise

In order for a new noise source to be audible, there would need to be a 3 dBA or greater noise increase to the ambient noise level. Locations in the project vicinity are expected to experience slight increases in ambient noise levels as a result of an increase in motor vehicle trips associated with the Proposed Project. For purposes of quantifying the Proposed Project's noise impacts resulting from mobile noise sources, the existing noise level from existing traffic volumes at the twelve study intersections was calculated based on the Future (2018) With Project traffic conditions as reported in the Project Traffic Study (see

Appendix F). This methodology is based on the California Department of Transportation (Caltrans), Technical Noise Supplement (Oct. 1998) formula for adding and subtracting equal sound pressure levels when the existing noise level is known. The existing noise level for all twelve study intersections was assumed to be 67.2 dBA (L_{eq}), which is the recorded noise level at the intersection of 9th Street and Hill Street. Based on the existing and future traffic volumes as reported in Appendix F, future roadway noise levels were then forecasted to determine if the Proposed Project's vehicular traffic would result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the Proposed Project. A substantial permanent increase would result if the Future With Project noise levels exceed the existing traffic noise levels by more than 3 dBA. As shown in Table III-15 on page III-174, none of the twelve study intersections would experience a noise level increase greater than 2.83 dBA. Therefore, the Proposed Project's mobile source noise impacts would be less than significant.

Stationary Noise Sources

New stationary sources of noise, such as mechanical HVAC equipment would be installed for the proposed residences at the Project Site. As discussed in Question XII (a) above, the design of this equipment would be required to comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Thus, because the noise levels generated by the HVAC equipment serving the Proposed Project would not be allowed to exceed the ambient noise level by five decibels on the premises of the adjacent properties, a substantial permanent increase in noise levels would not occur at the nearby sensitive receptors. This impact would be less than significant.

Parking Noise

Activities within the designated structured parking areas associated with the Proposed Project would have the potential to increase ambient noise levels in the area. Sources of noise within the above-grade parking areas on levels P1-P5 would include engines accelerating, doors slamming, car alarms, and people talking. Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. Noise levels would be highest in the early morning and evening when the largest number of people would enter and exit the Project Site. Noise levels within the garage spaces would largely be attenuated by concrete block walls, vertical louvers, perforated metal panels, and a window wall system. The concrete block walls along the east and north facades for levels 1-5 would eliminate any parking related noise from those areas. However, any parking noise that may be audible from outside of the parking areas fronting 9th and Hill Streets and the area abutting the existing 2.5 story parking Eastern Columbia parking garage would be no greater than the existing noise generated on the roadway and at the surface parking areas on the Project Site. The existing surface parking lot has no sound attenuation features, while the Modified Project would have a number of architectural features as described above, that would further attenuate noise levels from the parking garage. In addition, operational-related noise generated by motor driven vehicles within the Project Site is regulated under the LAMC. Specifically,

**Table III-15
Project Roadway Noise Impacts**

Intersection	Peak Hour	Existing Conditions (2015)	Existing (2015) Plus Project Impact		Cumulative Impact Future (2018) Plus Project		Significant Impact? (Yes/No)
		Noise Level (dBA)	Noise Level (dBA)	Increase (dBA)	Noise Level (dBA)	Increase (dBA)	
#1. 8 th St. and Olive St.	AM	67.2	67.24	0.04	69.37	2.17	No
	PM	67.2	67.23	0.03	69.55	2.35	No
#2. 9 th St. and Olive St.	AM	67.2	67.20	0.00	69.17	1.97	No
	PM	67.2	67.20	0.00	70.03	2.83	No
#3. 7 th St. and Hill St.	AM	67.2	67.32	0.12	68.46	1.26	No
	PM	67.2	67.32	0.12	68.45	1.25	No
#4. 8 th St. and Hill St.	AM	67.2	67.36	0.16	68.68	1.48	No
	PM	67.2	67.39	0.19	69.05	1.85	No
#5. 9 th St. and Hill St.	AM	67.2	67.30	0.10	68.71	1.51	No
	PM	67.2	67.31	0.11	69.16	1.96	No
#6. Olympic Blvd. and Hill St.	AM	67.2	67.75	0.55	68.70	1.50	No
	PM	67.2	67.31	0.11	68.88	1.68	No
#7. 7 th St. and Broadway	AM	67.2	67.22	0.02	68.64	1.44	No
	PM	67.2	67.25	0.05	68.51	1.31	No
#8. 8 th St. and Broadway	AM	67.2	67.21	0.01	68.77	1.57	No
	PM	67.2	67.24	0.04	69.09	1.89	No
#9. 9 th St. and Broadway	AM	67.2	67.21	0.01	68.81	1.61	No
	PM	67.2	67.20	0.00	69.06	1.86	No
#10. Olympic Blvd. and Broadway	AM	67.2	67.20	0.00	68.33	1.13	No
	PM	67.2	67.20	0.00	68.57	1.37	No
#11. 8 th St. and Spring St.	AM	67.2	67.21	0.01	68.18	0.98	No
	PM	67.2	67.24	0.04	69.57	2.37	No
#12. 9 th St. and Main St.	AM	67.2	67.21	0.01	68.81	1.61	No
	PM	67.2	67.21	0.01	68.93	1.73	No

Source: Calculations based on the California Department of Transportation (Caltrans), Technical Noise Supplement (Oct. 1998) formula for adding and subtracting equal sound pressure levels. Traffic volumes are based on the Project Traffic Impact Report prepared by The Mobility Group (see Appendix F).

with regard to motor driven vehicles, LAMC Section 114.02 prohibits the operation of any motor driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five decibels. Impacts with respect to the Proposed Project's surface parking areas would be mitigated to a less than significant level with implementation of Project Design Feature PDF-NOISE-2.

Project Design Features:**PDF-NOISE-2: Increased Noise Levels (Parking Structure Ramps)**

- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.

HVAC Equipment and Mechanical Equipment Noise

Upon completion and operation of the Proposed Project, on-site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed on the new structures. The noise levels generated by HVAC and mechanical equipment would be consistent with the allowable uses on the Project Site and with other mixed-use residential structures in the immediate vicinity. As such, the Project would not introduce a new noise source that is incompatible with the surrounding land uses. With respect to the anticipated noise level generated by HVAC equipment, noise levels within 15 feet of HVAC equipment can range between 69 dBA and 74 dBA without a sound shield and 68 dBA to 73 dBA with a sound shield, depending on the unit size.⁴¹ Ambient noise levels in the Project vicinity range from 67.2 dBA L_{eq} to 69.4 dBA L_{eq} . In accordance with the LAMC, HVAC and mechanical equipment will be required to be shielded from adjacent noise receptors. In addition, the operation of this and any other on-site stationary sources of noise would be required to comply with the LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. The Modified Project's HVAC equipment is proposed on level 27, which is located approximately 320 feet above grade and is set back approximately 80 feet from the eastern property line. As discussed previously, noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. Thus, the noise level of the HVAC equipment with a sound shield (i.e., 73 dBA L_{eq}) at 15 feet from the source would be reduced to approximately 61 dBA L_{eq} at the closest residential receptors. As such, the sound level of the HVAC equipment would be below ambient noise levels as shown in Table III-14, above. Thus, noise levels from the HVAC equipment would be less than significant.

Noise from Mixed Use Commercial and Residential Land Uses

As noted above, ambient noise levels in the Project vicinity range from 67.2 dBA L_{eq} to 69.4 dBA L_{eq} , with maximum noise levels ranging from 78.9 dBA L_{ax} to 82.3 dBA L_{max} . Due to the mixed-use nature of the Project, noise generated from the operation of proposed ground floor commercial uses have the potential to impact the proposed on-site residential uses and adjacent off site residential uses. Additionally, the outdoor open spaces on the 7th level podium deck and 27-level roof top deck have the potential to generate noise from groups of people congregating and talking, which could be audible at the

⁴¹ Average HVAC noise levels were based on product information data from Carrier Corporation, 25HBC5 Base 15 Heat Pump with Puron Refrigerant 1 – ½ to 5 Nominal Tons, Product Data.

on- and off-site residential uses. Such noises already occur in the immediate project vicinity from outdoor areas on other mixed-use buildings and are largely regulated by the property/building management and, to the extent necessary by the LAPD. With respect to outdoor noise levels generated by passive activities on the podium and roof top open space areas, there are no known noise prediction methodologies available to accurately predict noise levels attributable to a people gathering and recreating in outdoor courtyard spaces similar to the configurations shown on the Modified Project Site Plan. Representative noise levels on the order of 65 to 75 dBA L_{eq} have been recorded from small gatherings of people in outdoor common areas. Based on the principles of noise attenuation as described above, the resulting noise levels at the nearest residential receptor would be within the ambient noise levels recorded in the project vicinity in 2007 and 2015. Both the use and location of the proposed podium level deck would be similar to the Original Project's proposed deck. Thus no project changes, new information or changed circumstances would occur that would create a new significant environmental impact. Additionally, outdoor noise levels would be attenuated by approximately 10 to 20 dBA for indoor living spaces as a result of sound reflection from the adjacent building's façade and closed windows. Thus, noise from the proposed commercial and residential land uses would be less than significant.

Land Use Noise Compatibility

As shown in Table III-14, the ambient noise in the vicinity of the Project Site ranges from 67.2 to 69.4 L_{eq} . The maximum noise level during three 15-minute recordings was 82.3 dB L_{max} . For comparative purposes, the ambient noise levels recorded in the 2007 IS/MND fell within a range of 67.9 dBA L_{eq} and 75.5 dBA L_{eq} . The primary noise source at all three locations was vehicle traffic along Hill Street and 9th Street. Pedestrian traffic also contributed to the ambient noise levels, though to a lesser extent than the vehicle noise. In accordance with the Noise Element of the City of Los Angeles General Plan, a noise exposure of up to 60 dB CNEL exposure is considered to be the most desirable target for the exterior of noise-sensitive land uses, or sensitive receptors, such as homes, schools, churches, libraries, etc. It is also recognized that such a level may not always be possible in areas of substantial traffic noise intrusion. Exposures up to 70 dB CNEL for noise-sensitive uses are considered conditionally acceptable if all measures to reduce such exposure have been taken. Noise levels above 70 dB CNEL are normally unacceptable for sensitive receptors except in unusual circumstances. Within this context, the noise levels associated with the Property are within the Noise Element's target ranges for sensitive receptors in an urban environment. Thus, in order to ensure that on-site residences would not be adversely impacted by ambient urban noise levels, PDF-NOISE-1 would ensure that dwelling units associated with the Proposed Project would be constructed in accordance with Title 24 insulation standards of the California Code of Regulations for residential buildings, which serves to provide an acceptable interior noise environment for sensitive uses.

Project Design Features:**PDF-NOISE-1 Increased Noise Levels (Mixed-Use Development)**

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

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

Potentially Significant Unless Mitigation Incorporated. In order to address potential impacts to historic resources due to vibration during construction (particularly excavation and shoring for footings, foundations and other sub-grade construction activities including proposed subterranean parking), the 2007 IS/MND included a vibration study that was prepared by ATS Consulting (ATS). The ATS study determined that neither the Eastern Columbia nor May Company buildings qualified as “fragile” or “extremely fragile” buildings since both withstand substantial vibration from vehicular traffic on a daily basis with no signs of damage. This finding was further supported by the presence of construction vibration from the on-going rehabilitation of the Eastern Columbia Building at the time the study was conducted as well as the new parking garage between the two buildings along the Broadway frontage. Based upon this finding, ATS concluded that the buildings could be expected to withstand vibration levels up to at least 2 inches/second without cosmetic or structural damage. Using this vibration level as a threshold, ATS analyzed the proposed work and determined that vibration levels were not likely to exceed the threshold. As such, the 2007 IS/MND concluded that vibration due to construction was not anticipated to cause a significant adverse impact on the adjacent historical resources, presuming that driven piles are not necessary for new construction. However, the 2007 IS/MND noted that should driven piles be part of the proposed project, there is the potential that vibration levels will exceed the threshold of significance and mitigation is required to ensure that any potential impacts are reduced to a less than significant level.

In addition to the potential for damage through vibration, excavation and construction methods used for the adjacent new construction could result in settling or displacement of the foundations of the existing historic buildings and lead to material alteration of these resources. Thus, mitigation is also required to reduce potential impacts to a less than significant level. With implementation of mitigation measures, the 2007 IS/MND concluded the Original Project would be in conformance with the Secretary’s Standards, and potential impacts from construction and excavation would be reduced to a less than significant level.

Mitigation Measures:

See mitigation measures 11 through 14 under response to Checklist Question 3.a, Cultural Resources.

Modified Project

Potentially Significant Impact Unless Mitigation Incorporated. The Modified Project is substantially similar to the Original project in that both projects require excavation and shoring to construct the structural footings and subterranean parking garage. As compared to the Original Project, the Modified Project would require less excavation and earthwork as the depth of excavation would extend only one level below grade as opposed to two levels as originally proposed. Thus, vibration from the earthwork and excavation would be substantially similar to the analysis described in the 2007 IS/MND. With implementation of Mitigation Measures 11 through 14 (See response to Checklist Question 3.a, Cultural Resources), the Modified Project would be in conformance with the Secretary's Standards, and potential vibration impacts from construction and excavation would be reduced to a less than significant level.

In terms of human annoyance resulting from vibration generated during construction, residents in the five sensitive receptors previously identified in this section would be exposed to increased vibration levels on a temporary and intermittent basis during the construction period. Implementation of the measures identified under Mitigation Measures 11 through 14 would serve to reduce construction related vibration impacts and RC-NOISE-1 and RC-NOISE-2 would further reduce construction related vibration levels to the maximum extent feasible. These measures would reduce the annoyance factor to an acceptable level. Furthermore, all construction activity would be restricted to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday. Because any vibration level increases experienced at the residential uses in close proximity to the Project Site would occur during the acceptable time periods for construction activities, and would only occur on a temporary and intermittent basis during the construction period, impacts associated with groundborne vibration would be considered less than significant.

Regulatory Compliance Measures:**RC-NOISE-2: Temporary Groundborne Vibration Impacts During Construction**

- All new construction work shall be performed so as not to adversely affect the structural integrity or historic designations of the Broadway Trade Center Building located immediately adjacent to the site to the north at 801 Broadway, and the Eastern Columbia building located at 847-855 S. Broadway. Preconstruction surveys shall be performed to document conditions of the on-site and adjacent historic structures. The structural monitoring program shall be implemented and recorded during construction.
- The performance standards of the structure monitoring plan shall including the following:
 - a) Documentation shall consist of video and/or photographic documentation of accessible and visible areas on the exterior and select interior facades of the buildings. A registered civil engineer or certified engineering geologist shall develop recommendations for the adjacent structure monitoring program that would include, but not be limited to, vibration monitoring, elevation and lateral monitoring points, crack monitors and other instrumentation deemed necessary to protect the historic resources from construction-related damage.

- b) The monitoring program shall survey for vertical and horizontal movement, as well as vibration thresholds. If the thresholds are met or exceeded, or noticeable structural damage becomes evident to the project contractor, work shall stop in the area of the affected building until measures have been taken to stabilize the affected building to prevent construction related damage to historic resources.
 - c) The structure monitoring program shall be submitted to the Department of Building and Safety and received into the case file for the associated discretionary action permitting the project prior to initiating any construction activities.
- c) **Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

Original Project

Less Than Significant Impact. A significant impact would occur if the project caused a substantial permanent increase in noise levels above existing ambient levels. As discussed in response to Checklist Question 11.a, the Original Project would not permanently increase ambient noise levels by more than five dBA, and, as such, the impact would be less than significant.

Modified Project

Less Than Significant Impact. A significant impact would occur if the project caused a substantial permanent increase in noise levels above existing ambient levels. As discussed in response to Checklist Question 11.a, the Modified Project would not permanently increase ambient noise levels by more than five dBA, and, as such, the impact would be less than significant.

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

Original Project

Less Than Significant Impact. The 2007 IS/MND concluded that temporary and intermittent noise from construction equipment may increase the ambient noise levels in the project vicinity. However, Mitigation Measures 48 through 54 would reduce potential impacts associated with the Original Project. Therefore, a less than significant is anticipated with the implementation of mitigation.

Modified Project

Less Than Significant Impact. As discussed above, impacts are expected to be less than significant for construction noise and vibration, and operational noise and vibration. Implementation of Mitigation Measures 48 through 54 would ensure the Proposed Project would not result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity, and these impacts would be less than significant.

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

Original Project

No Impact. As concluded in the 2007 IS/MND, the nearest public use airport to the Project Site is Los Angeles International Airport, which is located approximately 11 miles to the southwest of the Project Site. Therefore, the Original Project would not expose any people to excessive noise levels associated with any airport activities and the Original Project would have no impact in relation to airport noise levels.

Modified Project

No Impact. The Modified Project is proposed in the same location as the Original Project. There are no airports within a two-mile radius of the Project Site, and the Project Site is not within any airport land use plan or airport hazard zone. The Modified Project would not expose people to excessive noise levels associated with airport uses. Thus, no impact would occur.

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

Original Project

No Impact. The Project Site is not located within the vicinity (i.e., five miles) of any airstrips. Therefore, the Original Project would not expose any people to excessive noise levels associated with any airstrip activities. The Original Project would have no impact in relation to airport noise levels.

Modified Project

No Impact. Identical to the Original Project, the Project Site is not located in the vicinity of a private airstrip. As no such facilities are located in the vicinity of the Project Site, no impact would occur.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the 84 related projects identified in Section II, Project Description, would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City of Los Angeles. The Project Applicant has no control over the timing or sequencing of the related projects that have been identified within the Proposed Project study area. Therefore, any quantitative analysis that assumes multiple, concurrent construction projects would be speculative. Construction-period noise for the Proposed Project and each related project (that has not yet been built) would be localized. In addition, each of the related projects would be required to comply with the City's noise ordinance, as well as mitigation measures that may be prescribed pursuant to CEQA provisions that

require potentially significant impacts to be reduced to the extent feasible. With respect to cumulative traffic noise impacts, it should be noted that the Proposed Project's mobile source vehicular noise impacts are based on the predicted traffic volumes as presented in the Project Traffic Study. Thus, the future predicted noise levels include the traffic volumes from the Proposed Project and future traffic levels associated with ambient growth and the related projects. Based on the Proposed Project's estimated trip generation, it is clear that the Project would not have the potential to double the traffic volumes on any roadway segment or study intersection in the vicinity of the Project Site. As such, the Proposed Project's noise volumes would not be cumulatively considerable. Thus, the cumulative impact associated with construction noise would be less than significant.

XIII. POPULATION AND HOUSING

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

A significant impact may occur if the Modified Project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on population and housing growth shall be made considering: (a) the degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and (c) the extent to which growth would occur without implementation of the project.

Original Project

Less Than Significant Impact. The Original Project would provide 167 multiple-family residential units. As analyzed in the 2007 IS/MND, under the Central City per unit rate of 1.56 persons per household, it is estimated that the Original Project would generate approximately 260 new residents. This represents an increase in Central District multi-family residential population of 0.04 percent over the estimated 2004 population. The project increase of 0.04 or 0.06 percent would not be considered substantial population growth and impacts would be less than significant.

Modified Project

Less Than Significant Impact. In October 2008, SCAG approved and adopted the "2008 Regional Comprehensive Plan for the SCAG Region – Helping Communities Achieve A Sustainable Future" (2008 RCP). The 2008 RCP is a long-term comprehensive plan that provides a strategic vision for handling the region's land use, housing, economic, transportation, environmental, and overall quality of life needs. The 2008 RCP is intended to serve as an advisory document for local agencies in the SCAG region. The

following vision statement and guiding principles are based on the region's adopted Compass Growth Vision Principles for Sustaining a Livable Region. These statements further articulate how the RCP can promote and sustain the region's mobility, livability, and prosperity for future generations.

RCP Vision

To foster a Southern California region that addresses future needs while recognizing the interrelationship between economic prosperity, natural resource sustainability, and quality of life. Through measured performance and tangible outcomes, the RCP serves as both a voluntary action plan with short-term guidance and strategic, long-term initiatives that are guided by the following Guiding Principles for sustaining a livable region.

RCP Guiding Principles

Improve mobility for all residents. Improve the efficiency of the transportation system by strategically adding new travel choices to enhance system connectivity in concert with land use decisions and environmental objectives.

- *Foster livability in all communities.* Foster safe, healthy, walkable communities with diverse services, strong civic participation, affordable housing and equal distribution of environmental benefits.
- *Enable prosperity for all people.* Promote economic vitality and new economies by providing housing, education, and job training opportunities for all people.
- *Promote sustainability for future generations.* Promote a region where quality of life and economic prosperity for future generations are supported by the sustainable use of natural resources.

SCAG's Compass Growth Vision Strategy

SCAG's Compass Growth Vision, adopted in 2004, and incorporated into the 2008 RCP, encourages better relationships between housing, transportation, and employment. The Growth Vision is driven by four key principles: (1) Mobility – Getting where we want to go, (2) Livability – Creating positive communities, (3) Prosperity – Long-term health for the region, and (4) Sustainability – Preserving natural surroundings. Additionally, the Compass Growth Vision incorporates a 2% Growth Strategy⁴² that would increase the region's mobility by:

⁴² *Southern California Association of Governments, Final 2008 Regional Comprehensive Plan, Land Use Planning, Transportation and Growth, pg. 16 "Compass Blueprint would result in significant land use changes to only 2 percent of the total land area in the region. Voluntary implementation efforts, by all levels of government and all stakeholders, are part of what is referred to as the '2% Strategy'."*

- Putting new employment centers and new neighborhoods near major transit systems so that people can have transportation choices other than their cars.
- Designing safe, attractive transit centers and plazas that people enjoy using.
- Creating mini-communities around transit stations, with small businesses, urban housing and restaurants all within an easy walk.

On a policy level, the Modified Project is consistent with the goals and strategies of the RCP and the Compass Growth Vision Strategy discussed above. With respect to regional growth forecasts, SCAG forecasts the City of Los Angeles would experience a population increase to 4.34 million persons by 2030. As shown in Table III-16, SCAG's 2008 RTP Growth Forecast for the City of Los Angeles, below, the forecast from 2008 through 2030 envisions growth of 290,797 additional persons, yielding an approximate 6.7 percent growth rate and an annual growth rate of approximately 9,087 persons per year.

Based on the community's current household demographics (e.g., an average of 1.53 persons per household for the Central City area)⁴³, the construction of up to 305 residential dwelling units, and up to 6,171 square feet of ground floor retail and restaurant space, would generate approximately 467 new residents and 16 employees.⁴⁴ The proposed increase in housing units and population would be consistent with the SCAG forecast of 192,192 additional households and approximately 290,797 persons in the City of Los Angeles between 2010 and 2030. While the Modified Project represents larger population growth as compared to the Original Project, the Modified Project would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Modified Project occupancy/buildout, and that would result in an adverse physical change in the environment; or introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan.

Table III-16
SCAG's 2008 RTP Growth Forecast for the City of Los Angeles

Projection Year	Population	Households	Person/Households
2010	4,057,484	1,386,658	2.92
2030	4,348,281	1,578,850	2.75
Net Change from 2010 to 2030			
No. of Population/Households	290,797	192,192	
Percent Change	6.7%	13.2%	
<i>Source: SCAG, 2008 Regional Transportation (RTP) Update, adopted May 8, 2008.</i>			

⁴³ Based on a generation rate of 1.53 residents per dwelling unit. Los Angeles Department of City Planning Demographic Research Unit, *Local Estimates (Effective October 1, 2009)/Household Population/Central City Community Plan Area, Multi-Family Units*, accessed November 2015. This is a slight decrease of residents per dwelling unit as compared to the projected residents per dwelling unit of 1.56 people per household utilized in the 2007 IS/MND.

⁴⁴ An employee rate of 383 square feet per employee was used. USGBC, *building area per employee for community retail*.

According to the Department of City Planning, the Central City Community Plan projected a population of 27,212 persons (or 34,765 persons when development of dwelling units in commercial areas are included) and 14,398 dwelling units by 2010 within the Community Plan area.⁴⁵ The 2010 United States Census shows that the Central City Community Plan area had an actual population of 36,098 persons and 22,752 dwelling units in 2010.⁴⁶ The 2010 Census data shows that the actual population in the Central City CPA was higher than projected. Nevertheless, the Project is consistent with the City's goals of increasing mixed-use development in Downtown, near retail and services, and within a transit-rich area. Although the Modified Project's addition of up to 305 dwelling units and 467 net permanent residents would result in a net increase of 138 dwelling units and 270 new residents, as compared to the Original Project, the Modified Project is consistent with SCAG's growth projections for the Los Angeles region. Therefore, impacts related to housing would be less than significant.

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

A significant impact may occur if the Modified Project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere.

Original Project

No Impact. At the time the 2007 IS/MND was prepared, the Project Site was utilized as a construction staging area above surface parking. Therefore, development of the Original Project would not displace any existing residences and no impact would occur.

Modified Project

No Impact. The Modified Project would consist of the development of new housing and commercial land uses on a site that is currently occupied by a surface parking lot. As such, the Project would not displace any existing housing. The proposed mixed-use residential and retail uses are consistent with the allowable uses as permitted by the zoning and General Plan land use designations. Therefore, no impact would occur.

⁴⁵ City of Los Angeles Department of City Planning, *Central City Community Plan, Plan Population and Dwelling Unit Capacity Table*.

⁴⁶ *The Central City Community Plan Area contains the following tracts: 2074, 2075.01, 2075.02, 2073.01, 2073.02, 2062, 2077.10, 2079, 2240.10, 2260.02, and 2063. The population and dwelling units were calculated by summing the individual tracts together. Source: United States Census Bureau, 2010 Census Interactive Population Map, website: <http://www.census.gov/2010census/popmap/>, accessed March 2015.*

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

Original Project

No Impact. At the time the 2007 IS/MND was prepared, the Project Site was utilized as a construction staging area above surface parking. Therefore, development of the Original Project would not result in the displacement of people and no impact would occur.

Modified Project

No Impact. The Modified Project would consist of the development of a mixed-use residential and commercial building on a site that is currently occupied by a surface parking lot. No displacement of existing housing would occur with the development of the Modified Project. Therefore, no impact would occur.

Cumulative Impacts

Less Than Significant Impact. The related projects would introduce additional residential related uses to the City of Los Angeles. Any residential related projects would result in direct population growth in the City of Los Angeles. As shown in Table III-17, the Modified Project and related projects that involve residential developments would cumulatively contribute 27,187 new residential dwelling units to the Central City Community Plan area, generating approximately 41,597 new residents.

As discussed in Question 13(a), the Modified Project would not exceed the growth projections of SCAG's RCP for the City of Los Angeles subregion. Furthermore, the Modified Project is the type of project encouraged by SCAG and City policies, as the Project would promote and help accommodate growth in urban centers that are close to existing employment centers and mass transit. Because the Modified Project would not displace any residents, and population growth potentially associated with the Modified Project has already been anticipated per SCAG projections, the Modified Project's population growth, similar to the Original Project, would not be cumulatively considerable. Therefore, the Modified Project's cumulative impacts to population and housing would be less than significant.

**Table III-17
Projected Cumulative Housing Units**

Related Projects (By Housing Type)	Total Housing Units	Total Residents
Apartments/Condominiums	26,882	41,130
Related Projects Total:	26,882	41,130
Modified Project Net Total:	305	467
Cumulative Total:	27,187	41,597
<p><i>Notes:</i> Based on a generation rate of 1.53 residents per dwelling unit. Los Angeles Department of City Planning Demographic Research Unit, City of Los Angeles: 2009 Population Estimate Population by Housing Type, Central City Community Plan Area, website: http://cityplanning.lacity.org/DRU/Locl/LocFrame.cfm?geo=CP&loc=CCy&sgo=ct&rpt=PnH&yrx=Y09, accessed May 2015 Source: Parker Environmental Consultants, 2015</p>		

XIV. PUBLIC SERVICES

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

(i) **Fire protection**

Original Project

Potentially Significant Impact Unless Mitigation Incorporated. The nearest fire stations are Fire Station No. 9 located at 430 East Seventh Street and Station 10 located at 1335 S Olive Street. As the distances of the engine companies from the Project Site are less than 1.5 miles, both stations are within the allowable response distance as specified by LAMC Section 57.09.07. The Original Project would comply with all applicable provisions of the City's Fire and Building Codes and the LAFD would review final building design to ensure adequate Code compliance prior to issuance of any construction permits. With the implementation of Mitigation Measures 38 and 39 and the following mitigation measures the impact of the Original Project relative to LAFD services would be less than significant.

Mitigation Measures:

55. Project building plans shall include the submittal of a plot plan for approval by the Los Angeles Fire Department either prior to the recordation of the final map or the approval of a building permit. All structures shall be within 300 feet of an approved fire hydrant.
56. The Applicant shall consult with the Fire Department and incorporate fire prevention and suppression features appropriate to the design of the project.
57. Definitive plans and specifications shall be submitted to the Fire Department and requirements for necessary permits satisfied prior to commencement of any portion of the project.
58. Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.
59. Plot plans indicating access driveways and roads and turning areas shall be reviewed and approved by the Fire Department, prior to the issuance of a building permit.
60. During the construction phase, emergency access shall remain clear and unobstructed.
61. The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles (C.P.C. 19708).

62. All access roads, including fire lanes, shall be maintained in an unobstructed manner, removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code.
63. Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot, unless otherwise approved.
64. The project shall comply with all applicable State and local Codes and Ordinances found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles.

Modified Project

Potentially Significant Impact Unless Mitigation Incorporated.

Construction

Construction of the Modified Project would increase the potential for accidental on-site fires from the operation of construction equipment and the use of flammable construction materials. The implementation of best management practices (BMPs) for the operation of mechanical equipment and the use of flammable construction materials by construction contractors and work crews would minimize fire hazards associated with the construction of the Modified Project. The BMPs that would be implemented during construction of the Project would include: keeping mechanical equipment in good operating condition, and as required by law, carefully storing flammable materials in appropriate containers, and the immediate and complete cleanup of spills of flammable materials when they occur.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. Thus, construction could have the potential to adversely affect fire access. However, these impacts are considered to be less than significant because emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAFD, construction impacts are temporary in nature and do not cause lasting effects, and no complete lane closures are anticipated. Additionally, if any partial street closures are required, flagmen would be used to facilitate the traffic flow until construction is complete. Mitigation Measure TRAFFIC-1, as discussed in Section XVI (a), requires that a construction work site traffic control plan be submitted to the Department of Transportation (DOT) for review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties.

Operation

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

The Modified Project would include up to 305 dwelling units and up to 6,171 square feet of ground floor retail and restaurant space and would generate approximately 467 new residents and 16 employees. Thus, the Modified Project would increase the utilization of the Project Site, which is currently used as surface parking and would potentially increase the demand for LAFD services. Consistent with the findings of the 2007 IS/MND, LAFD Station No. 9 currently serves the Project Site, which is approximately 0.7 mile east of the Project Site. Based on the response distance criteria specified in LAMC 57.09.07A and the relatively short distance from Fire Station No. 9 to the Project Site, fire protection response would be considered adequate. With respect to Fire Services, the Modified Project would implement Mitigation Measures 38 and 39 and 55 through 64 of the Original Project.

Mitigation Measures:

55. Project building plans shall include the submittal of a plot plan for approval by the Los Angeles Fire Department either prior to the recordation of the final map or the approval of a building permit. All structures shall be within 300 feet of an approved fire hydrant.
56. The Applicant shall consult with the Fire Department and incorporate fire prevention and suppression features appropriate to the design of the project.
57. Definitive plans and specifications shall be submitted to the Fire Department and requirements for necessary permits satisfied prior to commencement of any portion of the project.
58. Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.
59. Plot plans indicating access driveways and roads and turning areas shall be reviewed and approved by the Fire Department, prior to the issuance of a building permit.
60. During the construction phase, emergency access shall remain clear and unobstructed.
61. The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles (C.P.C. 19708).

62. All access roads, including fire lanes, shall be maintained in an unobstructed manner, removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code.
63. Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot, unless otherwise approved.
64. The project shall comply with all applicable State and local Codes and Ordinances found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles.

Cumulative Impacts

Less Than Significant Impact. The Modified Project, in combination with the 84 related projects, could increase the demand for fire protection services in the Project area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Modified Project and related projects would contribute. Similar to the Modified Project, each of the related projects would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD in order to adequately mitigate fire protection impacts. Specifically, any related project that exceeded the applicable response distance standards described above would be required to install automatic fire sprinkler systems in order to mitigate the additional response distance. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Modified Project would not make a cumulatively considerable impact to fire protection services, and, as such cumulative impacts on fire protection would be less than significant.

(ii) Police Protection

For the purpose of this Initial Study, a significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered police station. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on police protection shall be made considering the following factors: (a) the population increase resulting from the Modified Project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional

contribution to the demand; and (c) whether the project includes security and/or design features that would reduce the demand for police services.

Original Project

Potentially Significant Unless Mitigation Incorporated. The Project Site is located within the Central Bureau of the LAPD and within the service area of the Central Community Police Station. The Central Community Police Station (Division), located at 251 East Sixth Street, is located approximately one-half mile to the northeast of the Project Site. Due to the low percentage increase in service population, the Original Project is not expected to exceed the capabilities of the existing Central Division. During construction, the on-site storage of construction equipment and building materials could result in theft. However, with the implementation of recommended Mitigation Measures, the impact of the Original Project would be less than significant.

Mitigation Measures:

65. During the project's construction phase, the Applicant shall ensure adequate through access and emergency access to adjacent uses.
66. The Applicant shall consult with the Police Department and comply with recommended security features for the construction site(s), including security fencing, locked entrances, lighting, and the use of a 7-day, 24-hour security patrol.
67. Upon completion of the project, the Applicant shall provide the Central Division Commanding Officer with a diagram of each portion of the property including access routes and other information that might facilitate police response, as requested by the LAPD.
68. The applicant shall provide project plans to the LAPD Crime Prevention Unit, to determine any additional crime prevention and security features appropriate to the design of the project. Any additional design features identified by the LAPD Crime Prevention Unit shall be incorporated into the project's final design and to the satisfaction of LAPD, prior to issuance of a Certificate of Occupancy for the project.
69. The project shall incorporate design guidelines relative to security, semi-public and private spaces, which may include, but not be limited to, access control to buildings, secured parking facilities, walls/fences with key systems, well illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas and provision of security guard patrol throughout the project site if needed. The applicant is referred to Design Out Crime Guidelines: Crime Prevention Through Environmental Design (CPTED) published by the Los Angeles Police Department's Crime Prevention Section (located at Parker Center, 50 North Los Angeles Street, Room 818, Los Angeles, (213) 485-3134. The CPTED operates on three key concepts:

- Natural surveillance: The placement of physical features, activities, and people in a way that maximizes visibility.
- Natural access control: Restricting or encouraging people to come into a space through the placement of entrances, exits, fencing, landscaping, and lighting.
- Territorial reinforcement: The use of physical attributes to define ownership and separate public and private space.

Modified Project

Potentially Significant Unless Mitigation Incorporated. The Modified Project would include up to 305 dwelling units and up to 6,171 square feet of ground floor retail and restaurant space and would generate approximately 467 new residents and 16 employees. Thus, the Modified Project would increase the utilization of the Project Site, which is currently used as surface parking and would potentially increase the demand for LAPD services. Consistent with the findings of the 2007 IS/MND, the Project Site is located in the Central Area division of the LAPD's Central Bureau. The Central Bureau is approximately 65 square miles and includes the downtown business district, Eagle Rock, the Garment District, MacArthur Park, Dodger Stadium and Griffith Park. The Cities of Burbank, Glendale, Pasadena, and South Pasadena border the Central Bureau.⁴⁷ The Central Community Police Station serves the Project Site. Within the Central Area, the Modified Project is located within Reporting District (RD) 163.⁴⁸ Table III-18, Central City Police Station Crime Statistics, provides crime statistics for Central City area in the City of Los Angeles.

Construction sites, if left unsecured, have the potential to attract trespassers and/or vandals that would potentially result in graffiti, excess trash, and potentially unsafe conditions for the public. Such occurrences would adversely affect the aesthetic character of the Project Site and surrounding area and could potentially cause public health and safety concerns. With implementation of the following Regulatory Compliance Measure below, Project impacts would be less than significant during the construction period. Additionally, if any partial street closures are required, during construction flagmen would be used to facilitate the traffic flow until construction is complete. Project Design Feature PDF-TRAFFIC-1, as discussed in Section XVI (a), requires that a construction work site traffic control plan be submitted to the Department of Transportation (DOT) for review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties.

⁴⁷ Los Angeles Police Department, "About Central Bureau," http://www.lapdonline.org/central_bureau/content_basic_view, accessed March 2015.

⁴⁸ Los Angeles Times Local, Mapping L.A. LAPD Central Division, Reporting District 163, website: <http://maps.latimes.com/lapd/reporting-district/163/>, accessed March 2015.

**Table III-18
Central City Police Station Crime Statistics**

Crimes	2016 (Year to Date)^a	2015 (Year to Date)	2014 (Year to Date)
<i>Violent Crimes</i>			
Homicide	6	6	4
Rape	22	37	23
Robbery	287	258	194
Aggravated Assault	387	318	228
Total Violent Crimes	702	619	449
<i>Property Crimes</i>			
Burglary	232	312	202
Motor Vehicle Theft	542	388	373
BTFV	708	643	517
Personal / Other Theft	598	658	619
Total Property Crimes	2,080	2,001	1,711
Total Part 1 Crimes	2,782	2,620	2,160
Child / Spousal Abuse (Part I & II) ^b	349	290	237
Shots Fired	85	69	63
Shooting Victims	27	29	26
<i>Notes:</i>			
^a Crime Statistics for week ending February 8, 2016.			
^b Part II Child/Spousal Abuse Simple Assaults not included in Part I Aggravated Assaults above to comply with the FBI's Uniform Crime Reporting guidelines.			
Source: LAPD, COMPSTAT Unit, Central Area Profile, February 8, 2016.			

Implementation of the Modified Project would result in an increase of site visitors, residents, and employees to the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. However, similar to the Original Project, due to the low percentage increase in service population, the Modified Project is not expected to exceed the capabilities of the existing Central Division. The Modified Project would include adequate and strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed “dead zones” would be limited and, where possible, security controlled to limit public access. The building and layout design of the Modified Project would also include crime prevention features, such as nighttime security lighting and secure parking facilities. In addition, the continuous visible and non-visible presence of residents at all times of the day would provide a sense of security during evening and early morning hours. As such, the Project residents would be able to monitor suspicious activity at the building entry points. These preventative and proactive security measures would decrease the amount of potential service calls to the LAPD. As the LAPD does not currently have any plans for new police

stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur.⁴⁹ Additionally, the project area is further monitored by security offices working in partnership with the LAPD to patrol the Historic Core Business Improvement District by bike, foot beat, and segways, 24 hours a day every day.⁵⁰ With respect to Police Services, the Modified Project would comply with Mitigation Measures 65 through 69 of the Original Project. Mitigation 69 has been updated to reflect the current contact information with respect to Design Out Crime Guidelines: Crime Prevention Through Environmental Design, as referenced in the mitigation measure. The Modified Project would also include Regulatory Compliance Measure RC-PS-1. As such, the Modified Project's potential impact upon LAPD services would be mitigated to a less than significant level.

Mitigation Measures:

65. During the project's construction phase, the Applicant shall ensure adequate through access and emergency access to adjacent uses.
66. The Applicant shall consult with the Police Department and comply with recommended security features for the construction site(s), including security fencing, locked entrances, lighting, and the use of a 7-day, 24-hour security patrol.
67. Upon completion of the project, the Applicant shall provide the Central Division Commanding Officer with a diagram of each portion of the property including access routes and other information that might facilitate police response, as requested by the LAPD.
68. The applicant shall provide project plans to the LAPD Crime Prevention Unit, to determine any additional crime prevention and security features appropriate to the design of the project. Any additional design features identified by the LAPD Crime Prevention Unit shall be incorporated into the project's final design and to the satisfaction of LAPD, prior to issuance of a Certificate of Occupancy for the project.
69. The project shall incorporate design guidelines relative to security, semi-public and private spaces, which may include, but not be limited to, access control to buildings, secured parking facilities, walls/fences with key systems, well illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas and provision of security guard patrol throughout the project site if needed. The applicant is referred to Design Out Crime Guidelines: Crime Prevention Through Environmental Design (CPTED) published by the Los Angeles Police Department's Crime Prevention Section (~~located at Parker Center, 50 North Los Angeles Street,~~

⁴⁹ Los Angeles Police Department, Facilities Management Division, website: http://www.lapdonline.org/inside_the_lapd/content_basic_view/6392, accessed November 2015.

⁵⁰ Historic Core Business Improvement District, About the BID, website: <http://historiccore.bid/about-the-bid/>, accessed February 2016.

~~Room 818, Los Angeles, (213) 485-3134~~ located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. The CPTED operates on three key concepts:

- Natural surveillance: The placement of physical features, activities, and people in a way that maximizes visibility.
- Natural access control: Restricting or encouraging people to come into a space through the placement of entrances, exits, fencing, landscaping, and lighting.
- Territorial reinforcement: The use of physical attributes to define ownership and separate public and private space.

Regulatory Compliance Measures:

RC-PS -1 Public Services (Police – Demolition/Construction Sites)

- Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

Cumulative Impacts

Less Than Significant Impact. The Modified Project, in combination with the 84 related projects, would increase the demand for police protection services in the Project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Modified Project and related projects would contribute. In addition, each of the related projects would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Furthermore, each of the related projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site. No impacts are currently anticipated to occur. On this basis, the Modified Project would not make a cumulatively considerable impact to police protection services, and cumulative impacts on police protection would be less than significant.

(iii) Schools

A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD).

Original Project

Potentially Significant Unless Mitigation Incorporated. At the time the 2007 IS/MND was prepared, the schools serving the Original Project included Tenth Street Elementary School (grades 1-5), located at 1000 Grattan Avenue; Berendo Middle School (grades 6-8), located at 1157 South Berendo Street; and South Los Angeles Area New High School No. 1, located at 1921 South Maple Street. The Original Project estimated 68 students including 32 elementary, 16 middle, and 16 high school students. Payment of requisite school facility development fees required by State law would offset the potential impacts attributable to the Original Project at all three of the identified schools and impacts would be less than significant.

Mitigation Measures:

70. The Applicant shall pay fees related to capital acquisitions and improvements in effect at the time of building permit issuance in accordance with California Government Code Section 65995.

Modified Project

Potentially Significant Unless Mitigation Incorporated. The Project Site is located in LAUSD Board District 2. Since the completion of the 2007 IS/MND several schools have been completed in the vicinity that would also serve the Project Site. These schools include: John H. Liechty Middle School, located at 650 S. Union Avenue, which serves sixth through eighth grade students (Completed in 2007); Belmont SH Teacher Preparatory Academy, located 1200 W. Colton Street, which serves ninth through twelfth grade students (Completed in 2008); Miguel Contreras Learning Complex, located at 322 S. Lucas Avenue, which serves ninth through twelfth grade students (Completed in September of 2006), Ramon C. Cortines School of Visual and Performing Arts, located at 450 N. Grand Avenue, which serves ninth through twelfth grade students (Completed in 2009); and Edward R. Roybal Learning Center, located at 1200 W. Colton Street, which serves ninth through twelfth grade students (Completed in 2008). John H. Liechty Middle School was built to relieve student volume at Berendo Middle School. Miguel Contreras Learning Complex, Ramon C. Cortines School of Visual and Performing Arts, Belmont SH Teacher Preparatory Academy, and Edward R. Roybal Learning Center were built to relieve student volume at Belmont High School. Berendo Middle School no longer serves the Project Site. Tenth Street Elementary School, Berendo Middle School and South Los Angeles Area New High School No. 1 no longer serve the Project Site. Table III-19, Resident Schools Serving the Project Site, details the names, grades served, and location of each school.

As shown in Table III-20, Modified Project Estimated Student Generation, the Modified Project would generate approximately 50 elementary students, 14 middle school students and 29 high school students, for a total of approximately 93 students. The Modified Project would result in a net increase of 25 students including 18 elementary students and 13 high school students, as compared to the Original Project. However the Modified Project would result in a decrease of 2 middle school students, as compared to the Original Project.

**Table III-19
Resident Schools Serving the Project Site**

Campus	School Name	Grades	Address
A	9 th Street Elementary	K-5	835 Stanford Avenue
B	John H. Liechty Middle School	6-8	650 S. Union Avenue
C	Miguel Contreras Learning Complex (includes: Academic Leadership Community, School of Business and Tourism, School of Social Justice, and School of Global Studies)	9-12	322 S. Lucas Avenue
D	Ramon C Cortines School of Visual & Performing Arts	9-12	450 N Grand Avenue
E	Belmont Senior High School (includes: Los Angeles Teacher Preparatory Academy)	9-12	1200 W. Colton Street and 1575 W. 2 nd Street
F	Edward R Roybal Learning Center	9-12	1200 W. Colton Street

*Source: Los Angeles Unified School District, Resident School Identifier, website: <http://rsi.lausd.net/ResidentSchoolIdentifier/>, accessed August 2015.
Parker Environmental Consultants, 2015.*

**Table III-20
Modified Project Estimated Student Generation**

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
Modified Project					
Multi-Family Residential ^a	305 du	50	14	29	93
Retail and Restaurant [†]	6,171 sf	0	0	0	0
Total Estimated Students		50	14	29	93

Notes:
^a *sf = square feet; du = dwelling units*
^a *Student generation rates are as follows for multi-family residential uses: .1649 elementary, .0450 middle and .0943 high school students per unit. Los Angeles Unified School District, School Facilities Needs Analysis for Los Angeles Unified School District, September 2012.*
^b *Student generation rates are as follows for retail/commercial uses: .0149 elementary, .0069 middle and .0067 high school students per 1,000 square feet. Retail/commercial includes daycare facility, mini-warehouse, and retail. Source: Los Angeles Unified School District, School Fee Justification Study, September 2002.*
Source: Parker Environmental Consultants, 2016.

As shown in Table III-21, schools serving the Project Site are generally below capacity and would therefore be able to accommodate the additional students generated by the Modified Project. While John H. Liechty Middle School is currently overcrowded by LAUSD standards, the projected capacity for the

school is 1,439 seats and the projected enrollment indicates 1,285 students.⁵¹ Furthermore, similar to the Original Project, the Project Applicant would be required to pay all applicable developer fees to the LAUSD to offset the Modified Project's demands upon local schools. Pursuant to Government Code Section 65995, the development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation." Thus, Mitigation Measure 70 of the Original Project is incorporated in this Addendum and would reduce the Modified Project's potential impact upon public school services to a less than significant level.

Mitigation Measures:

70. The Applicant shall pay fees related to capital acquisitions and improvements in effect at the time of building permit issuance in accordance with California Government Code Section 65995.

**Table III-21
Student Capacity at Schools Serving the Project Site**

Schools Serving the Project Site^a	Grades	2013 – 2014 Student Enrollment^b	Resident Enrollment^b	Capacity^b	Overcrowding^b
9th Street Elementary School	K-5	176	199	267	No
John H. Liechty Middle School	6-8	1,182	1,367	1,197	Yes
Belmont Senior High School	9-12	966	--	1,349	No
Belmont SH Teacher Preparatory Academy	9-12	247	--	359	No
Edward R. Roybal Learning Center	9-12	1,246	--	1,712	No
Ramon C. Cortines School of Visual and Performing Arts	9-12	1,682	--	1,714	No
Miguel Contreras Learning Complex ^d	9-12	1,803	--	2,162	No

Notes:
^a Los Angeles Unified School District, Resident School Finder, website: <http://rsi.lausd.net/ResidentSchoolIdentifier/>, accessed August 2015.
^b Based on written correspondence with LAUSD Facilities Services Division, LAUSD Schools Enrollments and Capacities Report, dated November 18, 2015 (See Appendix J of this Addendum).
^d Contreras Learning Complex includes four schools: Academic Leadership Community, Los Angeles School of Global Studies, School of Social Justice, and School of Business and Tourism.
Source: Parker Environmental Consultants, 2016.

Cumulative Impacts

Less Than Significant Impact. As shown in Table III-21, above, schools serving the Project Site would have capacity to meet student enrollment generated by the Modified Project. The Modified Project, in combination with the 84 related projects is expected to result in a cumulative increase in the demand for school services. While the Modified Project would not result in a significant impact upon school services, these related projects would have the potential to generate students that would attend the same schools as

⁵¹ LAUSD Facilities Services Division, LAUSD Schools Enrollments and Capacities Report, dated November 18, 2015 (See Appendix I of this IS/MND Addendum).

the Modified Project. As shown in Table III-22, Projected Cumulative Student Generation, the Modified Project and related projects would cumulatively contribute approximately 4,729 elementary school students, 1,338 middle school students and 2,674 high school students. Upgrades to existing schools and the construction of new school would be addressed by the LAUSD Facilities Services Division, which is responsible for the execution of the District's current bond programs, the maintenance and operations of schools, the utilization of existing assets, and master planning for future capital projects. The Facilities Services Division Strategic Execution Plan (2013) outlines the New School Construction Plan, the Repair and Modernization Program, the Joint Use/Innovation Fund and Charter Facilities Program, the Capital Improvement Program and the Capital Needs Assessment Master Planning and Facilities Condition Assessment. Furthermore, each of the new housing units would be responsible for paying mandatory school fees to mitigate the increased demand for school services pursuant to SB 50 and Government Code Sec. 65995. Therefore cumulative impacts on schools would be less than significant, as the Modified Project would not make a cumulatively considerable impact to school services.

**Table III-22
Projected Cumulative Student Generation**

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
Multi-Family Residences ^a	26,882 du	4,433	1,210	2,535	8,178
Office ^{b c}	8,036,225 sf	187	87	84	351
Retail ^{d e f}	3,005,122sf	45	21	20	85
Hotel ^{g h}	1,871,625 sf	14	7	6	27
Related Projects Total:		4,679	1,324	2,645	8,648
Modified Project Net Total:		50	14	29	93
Cumulative Total:		4,729	1,338	2,674	8,741

Notes:

sf = square feet; du = dwelling units

^a Student generation rates are as follows for multi-family residential uses: .1649 elementary, .0450 middle and .0943 high school students per unit. Los Angeles Unified School District, School Facilities Needs Analysis for Los Angeles Unified School District, September 2012

^b Student generation rates are as follows for office uses: .0233 elementary, .0108 middle and .0104 high school students per 1,000 square feet. Los Angeles Unified School District, School Facilities Needs Analysis for Los Angeles Unified School District, September 2012

^c Office uses include day care facilities, which assumes 35 sf / student and classroom facilities, which assumes 20 sf / seat. California Land Use Planning Handbook 2002.

^d Student generation rates are as follows for retail/commercial uses: .0149 elementary, .0069 middle and .0067 high school students per 1,000 square feet. Los Angeles Unified School District, School Fee Justification Study, September 2002

^e Retail/commercial uses include retail, fast-food restaurant, markets, quality restaurant, bar, gymnasiums, and entertainment/events.

^f Entertainment assumed to be 100 sf / employee. Cinema, amphitheaters and event facilities assumed to be 15 sf / seat. California Land Use Planning Handbook 2002.

^g Student generation rates are as follows for hotel uses: .0076 elementary, .0035 middle and .0034 high school students per 1,000 sf. Los Angeles Unified School District, School Fee Justification Study, September 2002

^h Hotel rooms assumed to be 575 sf.

Source: Parker Environmental Consultants, 2016.

(iv) Parks

A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project or if the Modified Project resulted in the construction of new recreation and park facilities that create significant direct or indirect impacts to the environment. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the Modified Project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

Original Project

Potentially Significant Unless Mitigation Incorporated. The Original Project's estimated population of approximately 261 residents would be expected to utilize existing neighborhood and regional parks. However, the majority of the general recreational needs of the residents would be met by the on-site amenities. Open space areas for the Original Project would include landscaped outdoor areas and indoor recreational amenities (gymnasium) for its residents as well as providing a variety of public outdoor spaces (swimming pools and deck areas). In order to satisfy the requirements of Section 17.12 of the LAMC, the project applicant may be required to dedicate additional parkland beyond any credited park/recreation space; pay in-lieu fees for any land dedication requirement shortfall; or provide onsite improvements equivalent in value to said in-lieu fees. Thus, the mitigation measure proposed in the 2007 IS/MND would assure that the Original Project would meet the requirements of Section 17.12. With the implementation of the proposed Mitigation Measure, the Original Project would have a less than significant impact in relation to parks and recreational facilities.

Mitigation Measures:

71. The project Applicant shall carry out one or more of the following: (1) dedicate additional parkland such that the project would provide a total of three acres per 1,000 project residents; (2) pay in-lieu fees for any land dedication requirement shortfall; or (3) provide onsite improvements equivalent in value to said in-lieu fees.

Modified Project

Potentially Significant Unless Mitigation Incorporated. The Public Recreation Plan (PRP), a portion of the Service Systems Element of the City of Los Angeles General Plan, provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards. The desired long-range standard for local parks is based on two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks or four acres per 1,000 persons of combined

neighborhood and community parks. However, the PRP also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of one (1) acre per 1,000 persons for neighborhood parks and one (1) acre per 1,000 persons for community parks, or two (2) acres per 1,000 people of combined neighborhood and community parks. It is important to note that these standards are Citywide goals and are not intended to be requirements for individual development projects.

The Modified Project is located within a highly urbanized area within the Central City Community Plan Area. As shown in Table III-23, there are approximately 116 acres of parkland and public recreation facilities within a 2-mile radius of the Project Site. These facilities range from 0.29-acres (San Julian Park) to 29.86 acres (Mac Arthur Park). Since the preparation of the 2007 IS/MND, several parks have been developed in the project area which include Spring Street Park, Grand Hope Park, and Vista Hermosa Park, which together create over 13 acres of parkland. As discussed in Checklist Question XII (a), it is estimated that the development of the Modified Project would result in an increase of 467 new residents to the area. Based on the standard parkland ratio goal of 4 acres per 1,000 residents, the Modified Project would generate a need for approximately 1.87 acres of public parkland. Similar to the Original Project, this demand would be met through a combination of (1) on-site open space proposed within the Project, (2) payment of applicable taxes in accordance with LAMC Section 21.10.3(a)(1), and (3) the availability of existing park and recreation facilities within the area. The Modified Project would provide approximately 32,225 open space for the residents, which includes 15,150 square feet of private balconies and patios and 17,075 square feet in common open space. On-site amenities would include: Rooftop terrace, landscaping features, pool and spa with a pool deck, and outdoor seating. In addition to the on-site open space provided within the Modified Project, the Modified Project is subject to a tax of \$200 per dwelling unit pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax). This tax, payable to the Department of Building and Safety, shall be deposited into a "Park and Recreational Sites and Facilities Fund" to be used exclusively for the acquisition and development of park and recreational sites. In accordance with LAMC Section 21.10.3(a)(1), this tax may be offset or reduced based on the amount of on-site open space and recreational amenities provided on-site. Therefore, under the City's mandatory Dwelling Unit Construction Tax, which is collected prior to a certificate of occupancy for residential land uses, Mitigation Measure 71 of the Original Project the Modified Project's impact upon parks and recreational facilities would be reduced to a less-than-significant level.

Mitigation Measures:

71. The project Applicant shall carry out one or more of the following: (1) dedicate additional parkland such that the project would provide a total of three acres per 1,000 project residents; (2) pay in-lieu fees for any land dedication requirement shortfall; or (3) provide onsite improvements equivalent in value to said in-lieu fees.

**Table III-23
Recreation and Park Facilities within the Project Area**

Park Name	Park Size (acres)	Park Amenities	Approx. Distance to Project Site (miles)
1. Grand Hope Park	2.07	Clock tower, open space (lawns), and children's play area	0.2
2. Pershing Square Park	4.44	Ice skating rink (seasonal), stage, sunken amphitheater	0.41
3. Spring Street Park	0.56	Open space, benches, and children's play area	0.57
4. Maguire Gardens	1.62	Open space, benches and fountain	0.7
5. 6 th & Gladys Street Park	0.34	Open space and basketball court	0.82
6. Venice Hope Park	0.36	Open space and playground	0.9
7. San Julian Park	0.29	Open space and benches	0.9
8. City Hall Park Center	1.2	Open space and benches	1.01
9. Grand Park	12	Open space, benches, and dog park	1.2
10. Hope and Peace Park	0.57	Basketball courts and benches	1.31
11. Trinity Recreation Center	2.06	Auditorium, basketball courts (lighted/outdoor), open space, children's play area.	1.35
12. Alvarado Terrace Park	0.91	Children's play area and gazebo	1.38
13. Saint James Park	0.68	Children's play area, open space	1.55
14. Pico Union Park	0.35	Children's play area, picnic tables	1.6
15. Los Angeles Plaza Park	1.81	Open space, benches, and Olvera Street	1.6
16. Mac Arthur Park	29.86	Lake, recreation center, open space, benches, children's play area, auditorium, picnic tables, walking paths, auditorium, class room, and paddle boats	1.63
17. Hoover Recreation Center	2.46	Basketball courts, children's play area, picnic tables, indoor gym, barbecue pits, kitchen, gym	1.71
18. Alpine Recreation Center	1.94	Auditorium, basketball courts (lighted/indoor/outdoor), children's play area, indoor gyms (without weights), volleyball courts (lighted)	1.71
19. Echo Park Recreation Center	28.6	Children's play area, picnic tables, basketball courts, tennis courts, barbecue pits, pool, soccer field, boathouse, paddle boats	1.79
20. Vista Hermosa Park	10.5	Walking trails, picnic grounds, playground	1.8
21. Lake Street Park	1.83	Basketball courts, children's play area, volleyball courts, skate park	1.96
22. Pecan Recreation Center	4.2	Children's play area, picnic tables, basketball courts, indoor gym, pool, multi-purpose sports field	1.98
23. Lafayette Community Center	8.1	Children's play area, picnic tables, basketball courts, tennis courts, community room, soccer field, kitchen, stage, TV area	2.0
Total Parkland (Approximate):	116.75		
Sources: Park distance from the Project Site and amenities were determined using: (1) City of Los Angeles Department of Recreation and Parks, Facility Locator, http://www.laparks.org/ , accessed August 2015; (2) LA Parks Foundation, Find a Park, Google Maps, Satellite View, 2015. http://www.laparksfoundation.org/EN/ , accessed August 2015. (3) Size of each park was determined using Navigate LA, http://navigatela.lacity.org/navigatela/ , accessed August 2015;			

Cumulative Impacts

Less Than Significant Impact. Development of the Modified Project in conjunction with the related projects could result in an increase in permanent residents residing in the greater Project area. Additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential related projects are required to comply with payment of Quimby (for condominium units) and Parks and Recreation Fee (for apartment units). Each new non-adaptive re-use residential related project would also be required to comply with the on-site open space requirements of the LAMC. Therefore, with payment of the applicable recreation fees on a project-by-project basis, and the requirements of on-site open space pursuant to the LAMC, the Modified Project would not make a cumulatively considerable impact to parks and recreational facilities, and cumulative impacts would be less-than-significant.

(v) Other Public Facilities

Original Project

Potentially Significant Unless Mitigation Incorporated. As concluded in the 2007 IS/MND, development of the Original Project is not expected to cause an increase in the community population that would exceed the capacity of the Central Library. The Central Library provides for a larger regional area compared to other branch libraries in the LAPL system. Nevertheless, the LAPL generally recommends that per capita mitigation fees be paid to offset any increase in service demand and facility usage. Although the Original Project would have a less than significant impact relative to library services, with the implementation of the proposed Mitigation Measure, the Original Project's less than significant impacts would be further reduced.

Mitigation Measures:

72. The applicant shall pay per capita mitigation fees in accordance with the requirements of the Los Angeles Department of Public Libraries.

Modified Project

Less Than Significant Impact. Within the City of Los Angeles, the Los Angeles Public Library (LAPL) provides library services at the Central Library, eight regional branches and 64 community branches. Approximately 6.2 million books and other materials comprise the LAPL collection. The LAPL branches currently serving the Project Site include the Central Library, located at 630 W. 5th Street, approximately 0.7 miles north of the Project Site; the Little Tokyo Branch, located at 203 S. Los Angeles Street, approximately 1.1 miles northeast of the Project Site; and the Pico Union Branch, located at 1030 S. Alvarado Street, approximately 1.6 miles west of the Project Site.⁵² The Central Library is approximately

⁵² *City of Los Angeles Public Library, Hours and Locations, website: <http://www.lapl.org/branches>, accessed August 2015.*

538,000 square feet and contains approximately 2.6 million books and items. Since the preparation of the 2007 IS/MND, Measure L, the Public Library Funding Charter Amendment, was approved in March of 2011. Measure L increases the Los Angeles Public Library's share of existing city funds to restore library service hours. Measure L restored operation of the Central Library and eight regional branch libraries on Sundays, and also provided funds to purchase additional books and materials.⁵³ As there are no proposed expansions to the Central Library and no further plans to construct library facilities in the Project area, the library demands of the surrounding community and the Modified Project would be satisfied by existing library services. Mitigation Measure 72 of the Original Project ensures that the Modified Project's impacts upon library services would be less than significant.

Mitigation Measures:

72. The applicant shall pay per capita mitigation fees in accordance with the requirements of the Los Angeles Department of Public Libraries.

Cumulative Impacts

Less Than Significant Impact. Development of the related projects is projected to generate additional housing and residents within the study area, which would likely generate additional demands upon library services. This increase in resident population, combined with the 467 additional residents generated by the Modified Project, would result in a cumulative increase in demands upon public library services. To meet the increased demands upon the City's Public Library system, Los Angeles voters passed a Library Bond Issue for \$178.3 million to improve, renovate, expand, and construct 32 branch libraries. Since the Program's inception in 1998, the Library Department and the Department of Public Works, Bureau of Engineering have made considerable progress in the design and construction of the branch library facilities. Based on the growth forecasts utilized in the 2007-2010 Strategic Plan, much of this growth has already been accounted for in planning new and expanded library facilities. Furthermore, in 2011, voters approved Measure L, the Public Library Funding Charter Amendment, which increases the Los Angeles Public Library's share of existing city funds to restore recently cut library service hours, purchase books and increase access to the Library's collections, computers and programs including after-school/summer youth, student homework help, adult literacy and job search programs. There are no further plans to construct library facilities in the Project area.⁵⁴ As the 467 additional residents generated by the Modified Project would not make a cumulatively considerable impact upon the City's library system, cumulative impacts related to library facilities would be reduced to a less than significant level.

⁵³ *City of Los Angeles Public Library, Measure L, website: <http://www.lapl.org/measure-l>, accessed February 2016.*

⁵⁴ *Ibid.*

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

For the purpose of this Initial Study, a significant impact may occur if the project would include substantial employment or population growth, which would increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the Modified Project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

Original Project

Less Than Significant Impact. The increased demand on parkland and recreational facilities generated by the Original Project is not expected to result in substantial adverse impacts. The impact of the Original Project relative to recreation is expected to be less than significant.

Modified Project

Less Than Significant Impact. The Modified Project would provide approximately 32,225 square feet of open space and recreational facilities on-site. The Project may include a variety of on-site amenities including, but not limited to, common open space, private balconies, rooftop terrace, landscaping features, pool and spa with a pool deck, and outdoor seating areas. Notwithstanding the availability of on-site recreational amenities and open space areas, it is reasonable to assume that the future occupants of the Modified Project would utilize recreation and park facilities in the surrounding area. As noted in Table III-23, above, there are 23 existing new and recently improved parks within the Project area totaling more than 116 acres that are available to serve the future residents and retail visitors to the Project Site. Notable new additions to the downtown area are Grand Park, at the Los Angeles Civic Center, and Spring Street Park, a pocket park recently developed at 426 S. Spring Street. However, the availability of the on-site recreation amenities described above would serve to reduce the demand for off-site park services and thus, the Modified Project would not substantially increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, under the City's mandatory Dwelling Unit Construction Tax, which is collected prior to a certificate of occupancy for residential land uses, the Modified Project's impact upon parks and recreational facilities would be reduced to a less than significant level.

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?

A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment.

Original Project

Less Than Significant Impact. The Original Project would provide on-site recreation space and facilities for the use of residents, including a pool, lounge, exercise facility and landscaped courtyards. With the provision of on-site recreational facilities, and the number of estimated residents, no major park development projects or expansions are anticipated that would require the scale of construction that would result in a significant impact to the environment. Therefore, the impact of the Original Project relative to the construction of offsite recreational facilities is expected to be less than significant.

Modified Project

Less Than Significant Impact. The Modified Project would provide approximately 32,225 square feet of open space and recreational facilities on-site. As previously discussed in Checklist Question XV(a), the Modified Project would not require the construction or expansion of recreational facilities beyond the limits of the Project Site. As noted above, there are 23 existing, new, or recently improved parks within the Project Area totaling more than 116 acres that are available to serve the future residents and retail visitors to the Project Site. The increase in demand generated by the Modified Project would be met through a combination of on-site amenities and existing parks in the Project area and would not require the construction or expansion of City recreation facilities that may have an adverse physical effect on the environment. The Modified Project's increased demands upon recreational facilities would not in and of itself result in the construction of a new park. Which might have an adverse physical effect on the environment. Therefore, impacts to parks and recreational facilities would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Section 15355 of the State CEQA Guidelines defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." As discussed above, the Modified Project would have a less than significant impact on recreational resources. The Modified Project in combination with the 84 related projects would be expected to increase the cumulative demand for parks and recreational facilities in the City of Los Angeles. A number of new parks and recently renovated park improvements have been made in the downtown area to accommodate cumulative demands created by increased residential development. Similar to the Modified Project's requirement to pay a Dwelling Unit Construction Tax to improve recreation and park facilities, the related projects that include residential units would be required to pay similar recreation taxes and/or applicable Quimby fees to mitigate impacts upon park and recreational facilities. Additionally, each non-adaptive reuse residential related project would be subject to the provisions of the LAMC for providing on-site open space, which is

proportionately based on the amount of new development. Because the Modified Project would have a less than significant incremental contribution to the potential cumulative impact on recreational resources, the Modified Project would have a less than significant cumulative impact on such resources.

XVI. TRANSPORTATION AND TRAFFIC

The following section summarizes and incorporates by reference the information provided in the *Alexan South Broadway Project, Los Angeles, California* (Traffic Study), dated August 3, 2015, and *Supplemental Traffic Review Memorandum for 850. S. Hill Street Project* (Traffic Memo), dated January 22, 2016, prepared by The Mobility Group, included in Appendix F of this Addendum. The Traffic Study for the Original Project is included in Appendix H of the 2007 IS/MND.

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

Original Project

Less Than Significant Impact. As analyzed in the Traffic Study for the Original Project, the proposed building includes 267 condominium units and 5,520 square feet of ground-floor retail space. The Traffic Study concluded that the Original Project would create no significant traffic impacts. LADOT reviewed that document and agreed with the findings and provided an Approval Letter (see Attachment A of the Traffic Memo) dated June 21, 2006 (DOT Case No. CEN 06-2867). The trip generation estimates developed for the Original Project showed that the Original Project would generate a total of 1,140 net daily trips, 70 net AM peak hour trips and 102 net daily PM peak hour trips, as shown in Table III-24, below.

The Original Project analyzed a total of eight study intersections located in close proximity to the Project Site. The results of the AM and PM peak hour traffic impact analyses are shown in Tables III-25 and II-25. As shown in Tables III-25 and III-26, the Original Project did not create any significant impacts in either the AM or PM peak hour. The analysis for the Original Project was completed in 2006.

The Original Project did not identify any analysis locations as the total number of vehicle trips generated by the Original Project was less than 150 trips and therefore no additional analysis was needed. The Original Project did not conduct a CMP Transit impact analysis.

**Table III-24
Original Project Trip Generation Estimates**

Land Use	Size	Units	Daily Trips	AM Peak Hour			PM Peak Hours		
				IN	Out	Total	In	Out	Total
Condominiums	267	DU	850	11	53	64	51	25	76
Retail	5,520	SF	290	3	3	6	13	13	26
Total Net	--	--	1,140	14	56	70	64	38	102

Source: Crain and Associates, Traffic Analysis for Proposed Mixed-Use Project at the Northeast Corner of 9th Street and Hill Street, City of Los Angeles, May 2006.

**Table III-25
Original Project – Future With Project Conditions - Intersection Level of Service AM Peak Hour**

Intersection	AM Peak Hour				Change in V/C	Significant Impact
	Future Without Project		Future With Project			
	V/C	LOS	V/C	LOS		
1. Hill Street and 7 th Street	0.834	D	0.837	D	0.003	No
2. Hill Street and 8 th Street	0.438	A	0.445	A	0.007	No
3. Hill Street and 9 th Street	0.342	A	0.346	A	0.004	No
4. Hill Street and Olympic Boulevard	0.415	A	0.416	A	0.001	No
5. Broadway and 7 th Street	0.457	A	0.460	A	0.003	No
6. Broadway and 8 th Street	0.613	B	0.631	B	0.018	No
7. Broadway and 9 th Street	0.421	A	0.425	A	0.004	No
8. Broadway and Olympic Boulevard	0.617	B	0.619	B	0.002	No

*LOS = level of service; V/C = volume-to-capacity ratio
Source: Crain and Associates, Traffic Analysis for Proposed Mixed-Use Project at the Northeast Corner of 9th Street and Hill Street, City of Los Angeles, May 2006.*

**Table III-26
Original Project – Future With Project Conditions - Intersection Level of Service PM Peak Hour**

Intersection	AM Peak Hour				Change in V/C	Significant Impact
	Future Without Project		Future With Project			
	V/C	LOS	V/C	LOS		
1. Hill Street and 7 th Street	0.975	E	0.837	E	0.007	No
2. Hill Street and 8 th Street	0.537	A	0.445	A	0.013	No
3. Hill Street and 9 th Street	0.470	A	0.346	A	0.007	No
4. Hill Street and Olympic Boulevard	0.645	B	0.416	B	0.002	No
5. Broadway and 7 th Street	0.612	B	0.460	B	0.003	No
6. Broadway and 8 th Street	0.705	C	0.631	C	0.031	No
7. Broadway and 9 th Street	0.465	A	0.425	A	0.008	No
8. Broadway and Olympic Boulevard	0.775	C	0.619	C	0.012	No

*LOS = level of service; V/C = volume-to-capacity ratio
Source: Crain and Associates, Traffic Analysis for Proposed Mixed-Use Project at the Northeast Corner of 9th Street and Hill Street, City of Los Angeles, May 2006.*

Modified Project

Less Than Significant Impact. The Project has since been modified and a revised Traffic Study for the new Project Description (Modified Project), dated September 30, 2015, was submitted to LADOT for review on October 1, 2015. The Modified Project is comprised of 305 market-rate apartments, up to 3,499 square feet of ground-floor retail space and 3,500 square feet of restaurant space. LADOT reviewed the Traffic Study and agreed with the findings and provided an Approval Letter dated October 19, 2015 ((DOT Case No. CEN 15-42971) (See Appendix F of this IS/MND Addendum)). Additionally, LADOT has reviewed the supplemental Traffic Memo and provided an Approval Letter dated February 3, 2016, which concurs with the findings of the Traffic Memo, in that the traffic impacts resulting from the Modified Project would continue to be less than significant ((DOT Case No. CEN 16-44067) (See Appendix F of this IS/MND Addendum)).

The Transportation Research Board Circular 212 Critical Movement Analysis (CMA) Planning Method was used to analyze traffic operating conditions at study intersections. CMA methodology compares the amount of traffic an intersection is able to process (capacity) to the level of traffic during peak hours (volume). The resulting volume-to-capacity ratio (v/c) is expressed in terms of level of service (LOS). LOS A represents free-flow activity and LOS F represents overcapacity operation. LOS is a qualitative assessment of the quantitative effects of such factors as traffic volume, roadway geometrics, speed, delay, and maneuverability on roadway and intersection operations.

The City of Los Angeles determines whether a transportation impact at a signalized intersection is significant according to a sliding scale. At an intersection with a final LOS C, a project impact would occur if the project contributes 0.040 or greater to the intersection V/C. At an intersection with a final LOS D, a project impact would occur if the project contributes 0.020 or greater to the intersection V/C. At an intersection with a final LOS E or F, a project impact would occur if the project contributes 0.010 or greater to the intersection V/C. Refer to Table III-27, Definition of Significant Impact at Intersection, below.

**Table III-27
Definition of Significant Impact at Intersection**

Level of Service	Volume-to-Capacity (V/C)	Project-related Increase in Volume-to-Capacity (V/C) Ratio
C	0.701–0.800	Equal to or greater than 0.04
D	0.801–0.900	Equal to or greater than 0.02
E, F	> 0.900	Equal to or greater than 0.01

Operational Traffic

A total of twelve intersections were identified, in conjunction with LADOT staff, for inclusion in the traffic analysis. The analyzed locations are shown in Figure 2.1 of the Traffic Study. The Modified Project analyzed an additional four intersections as compared to the Original Project. All study intersections are signalized and currently operate under the City’s Automated Traffic Surveillance and Control (ATSAC) system which is a centralized control system that provides for the coordination of traffic signal timing to maximize the street capacities and to minimize traffic delays on City streets. None of these intersections are Los Angeles County Congestion Management Plan (CMP) monitoring locations. In addition, a CMP analysis is not required because the Project would not add 50 or more peak-hour trips to any CMP arterial monitoring intersections, including freeway on- and off-ramps. Furthermore, the Project would not add 150 or more peak-hour trips to freeway mainline monitoring locations. The intersections identified for analysis are as follows:

- | | |
|--|--|
| 1. Olive Street and 8 th Street | 7. Broadway and 7 th Street |
| 2. Olive Street and 9 th Street | 8. Broadway and 8 th Street |
| 3. Hill Street and 7 th Street | 9. Broadway and 9 th Street |
| 4. Hill Street and 8 th Street | 10. Broadway and Olympic Boulevard |
| 5. Hill Street and 9 th Street | 11. Spring Street and 8 th Street |
| 6. Hill Street and Olympic Boulevard | 12. Main Street and 9 th Street |

Existing Intersection Conditions

Recent traffic counts were used for all of the analyzed intersections. AM and PM peak period counts (7-10 AM and 3-6 PM) were conducted at all study intersection in February of 2015. The existing peak hour traffic volumes are illustrated in Table III-28 for the AM and PM peak hours (highest volume hours within peak periods). All studied intersections operate at LOS A during the AM and PM peak hour.

**Table III-28
Existing Condition – Intersection Level of Service**

Intersection	Existing Conditions			
	AM		PM	
	V/C	LOS	V/C	LOS
1. Olive Street and 8 th Street	0.349	A	0.311	A
2. Olive Street and 9 th Street	0.395	A	0.401	A
3. Hill Street and 7 th Street	0.437	A	0.564	A
4. Hill Street and 8 th Street	0.395	A	0.432	A
5. Hill Street and 9 th Street	0.394	A	0.505	A
6. Hill Street and Olympic Boulevard	0.413	A	0.519	A
7. Broadway and 7 th Street	0.463	A	0.541	A
8. Broadway and 8 th Street	0.359	A	0.441	A
9. Broadway and 9 th Street	0.375	A	0.521	A
10. Broadway and Olympic Boulevard	0.453	A	0.565	A
11. Spring Street and 8 th Street	0.246	A	0.245	A
12. Main Street and 9 th Street	0.439	A	0.503	A

*LOS = level of service; V/C = volume-to-capacity ratio
Source: Alexan South Broadway Project Traffic Study, The Mobility Group, August 3, 2015.*

Existing Transit Service

Transit options in the vicinity of the Project Site are illustrated in Figure 2.3 of the Traffic Study. The Project Site is located in downtown Los Angeles which is at the hub of the regional transit network in the Los Angeles area. The Project Area is currently served by a total of four local and inter-city transit operators.

Metro also operates four rail lines in the Project Area. The Metro Red Line and Purple Lines serve the Pershing Square Metro Station at Hill Street & 5th Street. The Metro Red Line, Purple Line, Blue Line and Expo Lines serve the 7th/Metro Center Station at Hope Street & 7th Street. Table 2.3 of the Traffic Study lists the individual rail and bus lines serving the Project Area, and indicates the frequency of service during the key analysis times. The following is a summary of Transit Service of Major Streets in the Project vicinity.

Olive Street. Located west of the Project Site, Olive Street carries one Metro Rapid line (770) and eight Metro Local Bus lines (14, 70, 71, 76, 78, 79, 96, 378), one Foothill Transit line (FT SS), one Santa Monica Big Blue Bus line (BBB R10) and two Commuter Express lines (CE 431, 437) in the north direction.

Hill Street. Located immediate west of the Project Site, Hill Street carries two Metro Rapid lines (728, 794) and eight Metro Local Bus lines (2, 4, 28, 81, 83, 90, 91, 94), one Montebello line (M 50) and one Commuter Express line (CE 419) in a north-south direction.

Broadway. Located east of the Project Site, Broadway carries one Metro Rapid line (745) and eight Metro Local Bus lines (2, 4, 30, 35, 38, 40, 45, 330) in the north-south direction.

Spring Street. Located east of the Project Site, Spring Street carries two Metro Rapid lines (728, 733), nine Metro Local Bus lines (28, 30, 33, 40, 55, 83, 92, 330, 355), one LADOT DASH (Route D), and one Gardena Municipal Bus Line (GXIX), in the south direction.

Main Street. Located east of the Project Site, Spring Street carries two Metro Rapid lines (733), five Metro Local Bus lines (33,55,68, 92, 355), one LADOT DASH (Route D), and one Gardena Municipal Bus Line (GXIX).

7th Street. Located north of the Project Site, 7th Street carries one Metro Rapid line (760) , six Metro Local Bus lines (20, 38, 51, 52, 60, 352) and one LADOT DASH (Route D) in an east-west direction.

8th Street. Located north of the Project Site, 8th Street carries two Metro Local Bus lines (10, 66), one Commuter Express line (CE 419) and two Orange County Transportation Authority lines (OC 701, OC 721) in a west direction.

9th Street. Located immediate south of the Project Site, 9th Street carries three Metro Local Bus lines (10, 66, 81), and one Commuter Express line (CE 419) in an east direction.

Olympic Boulevard. Located south of the Project Site, Olympic Boulevard carries one Metro Rapid line (728) and one Metro Local Bus lines (28) in an east-west direction.

Estimated Trip Generation

The Modified Project’s trip generation estimates are presented in Table III-29 and Table II-30. As shown in Table III-29, the analysis estimates that the Modified Project would generate a total of 1,998 daily vehicle trips. As shown in Table III-30, the Modified Project would generate 137 AM peak hour vehicle trips and 184 PM peak hour vehicle trips. The daily and peak-hour trips for the project were generated using trip rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (9th Edition, 2012). Because of the commercial components of the Project, certain adjustments to the trip generation were therefore made to expect walk-ins either from the Project or surrounding area.

**Table III-29
Modified Project Trip Generation Estimates – Daily Trips**

Land Use Assumptions	Source & Code	Quantity	Units	Daily Trips	
				Trip Rate	Total Trips
<u>Proposed Uses</u>					
Apartments	ITE 220	305	DU	6.65	2,028
Reduction for transit/walk trips – 15%					-304
Net Apartments					1,724
Retail	ITE820	3,499	SF	42.70	149
Reduction for internal trips – 10%					-15
Reduction for transit/walk trips – 15%					-20
Reduction for pass-by trips – 10%					-57
Net Retail					57
Restaurant ¹	ITE 931	3,500	SF	89.95	315
Reduction for internal trips - 10%					-32
Reduction for transit /walk trips- 15%					-42
Reduction for pass-by-trips – 10%					-24
Net Restaurant					217
Net Total Daily Trips					1,998
<i>Notes:</i> DU = Dwelling Units, SF = Square Feet ¹ The Modified Project includes 6,999 square feet of retail space. The Traffic Study analyzed 3,500 square feet of restaurant to provide a more conservative analysis. Source: Alexan South Broadway Project Traffic Study, The Mobility Group, August 3, 2015.					

The adjustments are approved by LADOT to reflect these conditions. For the trips generated by apartment uses, a reduction of 15% for use of transit and walk-ins from the surrounding area was applied. For the trips generated by retail uses, a reduction of 10% for internal trips from the Project, 15% for use of transit and walk-ins from the surrounding area, and a pass-by rate of 50% were applied. For the trips generated by restaurant uses, a reduction of 10% for internal trips from the Project, 15% for use of transit and walk-ins from the surrounding area, and a pass-by rate of 10% were applied.

**Table III-30
Trip Generation Estimates – AM & PM Peak Hour**

Land Use Assumptions	Source & Code	Quantity	Units	AM Peak Hour						
				Trip Rate			Total Trips			
				In	Out	Total	In	Out	Total	
<u>Proposed Uses</u>										
Apartments	ITE 220	305	DU	0.10	0.41	0.51	31	125	156	
Reduction for transit/walk trips – 15%							-5	-18	-23	
Net Apartments							26	107	133	
Retail	ITE 820	3,499	SF	0.60	0.36	0.96	2	1	3	
Reduction for internal trips – 10%							0	0	0	
Reduction for transit/walk trips – 15%							0	0	0	
Reduction for pass-by trips – 10%							-1	-1	-2	
Net Retail							1	0	1	
Restaurant ¹	ITE 931	3,500	SF	0.45	0.36	0.81	2	1	3	
Reduction for internal trips – 10%							0	0	0	
Reduction for transit/walk trips – 15%							0	0	0	
Reduction for pass-by trips – 10%							0	0	0	
Net Restaurant							2	1	3	
Net Total AM Peak Hour Trips							29	108	137	
Land Use Assumptions	Source & Code	Quantity	Units	PM Peak Hour						
				Trip Rate			Total Trips			
				In	Out	Total	In	Out	Total	
<u>Proposed Uses</u>										
Apartments	ITE 220	305	DU	0.40	0.22	0.62	122	67	189	
Reduction for transit trips – 15%							-18	-10	-28	
Net Apartments							104	57	161	
Retail	ITE 820	3,499	SF	1.89	1.82	3.71	6	7	13	
Reduction for internal trips – 10%							-1	0	-1	
Reduction for transit/walk trips – 15%							-1	-1	-2	
Reduction for pass-by trips – 10%							-2	-3	-5	
Net Retail							2	3	5	
Restaurant ¹	ITE 931	3,500	SF	5.02	2.47	7.49	17	9	26	
Reduction for internal trips – 10%							-2	-1	-3	
Reduction for transit / walk trips – 15%							-3	0	-3	
Reduction for pass-by trips – 10%							-1	-1	-2	
Net Restaurant							11	7	18	
Net Total PM Peak Hour Trips							117	67	184	
<i>Notes:</i> DU = Dwelling Units, SF = Square Feet ¹ The Modified Project includes 6,999 square feet of retail space. The Traffic Study analyzed 3,500 square feet of restaurant to provide a more conservative analysis. Source: Alexan South Broadway Project Traffic Study, The Mobility Group, August 3, 2015.										

As shown in Table III-31 below, the Modified Project would generate a net total of 858 additional daily trips, 67 AM peak hour trips and 82 PM peak hour trips more than the Original Project. While the Modified Project is expected to generate a higher number of vehicle trips than the Original Project, neither the total number of trips generated by the Modified Project nor the net increase in vehicle trips, as compared to the Original Project, is expected result in any significant traffic impacts.

Project Impacts

Existing With Project Intersection Level of Service

Intersection analysis was conducted using the “Critical Movement Analysis (Planning Method)” as described in “Transportation Research Circular 212, Transportation Research Board, Washington D.C. 1980”, to obtain volume/capacity (V/C ratios at each intersection. Figure 2.3 and 2.4 in the Traffic Study presents the existing a.m. and p.m. peak-hour turn movement volumes for the study area intersections. As discussed above, the LOS were determined using the LADOT spreadsheet for calculating CMA methodology. Table III-32 summarizes the results of the Existing with Project AM peak-hour LOS analysis for the twelve study area intersections. Table III-33 summarizes the results of the Existing with Project PM peak-hour LOS analysis for the twelve study area intersections. As shown in Table III-32 and Table III-33, the addition of Project traffic would not cause the level of service to change at any of the study intersections during the AM and PM peak hour, and any increases in V/C ratios would be less than significant.

Table III-31
Trip Generation Comparison – Original Project Vs. Modified Project

Time Period	Original Project Trip Generation			Modified Project Trip Generation			Difference		
	In	Out	Total	In	Out	Total	In	Out	Total
Daily	--	--	1,140	--	--	1,998	--	--	858
AM Peak Hour	14	56	70	29	108	137	15	52	67
PM Peak Hour	64	38	102	117	67	184	53	29	82

Source: The Mobility Group, Supplemental Traffic Review Memorandum for 850. S. Hill Street Project, January 22, 2016.

Future with Project Intersection Level of Service

The intersection level of service analysis for the Future with Project conditions is summarized in Tables III-34 and III-35 for the AM and PM peak hours, respectively. These tables also compare the LOS for without Project and with Project conditions, show the increase in V/C ratios at each intersection due to

**Table III-32
Existing With Project Condition - Level of Service Summary for AM Peak Hour**

Intersection	AM Peak Hour				Project Impact	Significant Impact
	Existing		Existing With Project			
	V/C	LOS	V/C	LOS		
1. Olive Street and 8 th Street	0.349	A	0.355	A	0.006	No
2. Olive Street and 9 th Street	0.395	A	0.395	A	0.000	No
3. Hill Street and 7 th Street	0.437	A	0.441	A	0.004	No
4. Hill Street and 8 th Street	0.395	A	0.414	A	0.019	No
5. Hill Street and 9 th Street	0.394	A	0.400	A	0.006	No
6. Hill Street and Olympic Boulevard	0.413	A	0.416	A	0.003	No
7. Broadway and 7 th Street	0.463	A	0.465	A	0.002	No
8. Broadway and 8 th Street	0.359	A	0.361	A	0.002	No
9. Broadway and 9 th Street	0.375	A	0.376	A	0.001	No
10. Broadway and Olympic Boulevard	0.453	A	0.453	A	0.000	No
11. Spring Street and 8 th Street	0.246	A	0.247	A	0.001	No
12. Main Street and 9 th Street	0.439	A	0.439	A	0.000	No

*LOS = level of service; V/C = volume-to-capacity ratio
Source: Alexan South Broadway Project Traffic Study, The Mobility Group, August 3, 2015.*

**Table III-33
Existing With Project Condition - Level of Service Summary for PM Peak Hour**

Intersection	PM Peak Hour				Project Impact	Significant Impact
	Existing		Existing Plus Project			
	V/C	LOS	V/C	LOS		
1. Olive Street and 8 th Street	0.311	A	0.315	A	0.004	No
2. Olive Street and 9 th Street	0.401	A	0.401	A	0.000	No
3. Hill Street and 7 th Street	0.564	A	0.584	A	0.020	No
4. Hill Street and 8 th Street	0.432	A	0.459	A	0.027	No
5. Hill Street and 9 th Street	0.505	A	0.521	A	0.016	No
6. Hill Street and Olympic Boulevard	0.519	A	0.533	A	0.014	No
7. Broadway and 7 th Street	0.541	A	0.547	A	0.006	No
8. Broadway and 8 th Street	0.441	A	0.444	A	0.003	No
9. Broadway and 9 th Street	0.521	A	0.521	A	0.000	No
10. Broadway and Olympic Boulevard	0.565	A	0.566	A	0.001	No
11. Spring Street and 8 th Street	0.245	A	0.247	A	0.002	No
12. Main Street and 9 th Street	0.503	A	0.504	A	0.001	No

*LOS = level of service; V/C = volume-to-capacity ratio
Source: Alexan South Broadway Project Traffic Study, The Mobility Group, August 3, 2015.*

**Table III-34
Future with Project Condition - Level of Service Summary for AM Peak Hour**

Intersection	AM Peak Hour				Project Impact	Significant Impact
	Future Without Project		Future with Project			
	V/C	LOS	V/C	LOS		
1. Olive Street and 8 th Street	0.697	B	0.701	B	0.004	No
2. Olive Street and 9 th Street	0.585	A	0.585	A	0.000	No
3. Hill Street and 7 th Street	0.557	A	0.561	A	0.004	No
4. Hill Street and 8 th Street	0.545	A	0.564	A	0.019	No
5. Hill Street and 9 th Street	0.545	A	0.551	A	0.006	No
6. Hill Street and Olympic Boulevard	0.517	A	0.529	A	0.012	No
7. Broadway and 7 th Street	0.675	B	0.675	B	0.000	No
8. Broadway and 8 th Street	0.565	A	0.566	A	0.001	No
9. Broadway and 9 th Street	0.573	A	0.573	A	0.000	No
10. Broadway and Olympic Boulevard	0.576	A	0.577	A	0.001	No
11. Spring Street and 8 th Street	0.439	A	0.440	A	0.001	No
12. Main Street and 9 th Street	0.637	B	0.638	B	0.001	No

*LOS = level of service; V/C = volume-to-capacity ratio
Source: Alexan South Broadway Project Traffic Study, The Mobility Group, August 3, 2015.*

**Table III-35
Future with Project Condition - Level of Service Summary for PM Peak Hour**

Intersection	PM Peak Hour				Project Impact	Significant Impact
	Future Without Project		Future with Project			
	V/C	LOS	V/C	LOS		
1. Olive Street and 8 th Street	0.636	B	0.639	B	0.003	No
2. Olive Street and 9 th Street	0.779	C	0.779	C	0.000	No
3. Hill Street and 7 th Street	0.774	C	0.794	C	0.020	No
4. Hill Street and 8 th Street	0.623	B	0.649	B	0.026	No
5. Hill Street and 9 th Street	0.844	D	0.861	D	0.017	No
6. Hill Street and Olympic Boulevard	0.771	C	0.785	C	0.014	No
7. Broadway and 7 th Street	0.736	C	0.740	C	0.004	No
8. Broadway and 8 th Street	0.745	C	0.747	C	0.002	No
9. Broadway and 9 th Street	0.782	C	0.783	C	0.001	No
10. Broadway and Olympic Boulevard	0.845	D	0.846	D	0.001	No
11. Spring Street and 8 th Street	0.425	A	0.432	A	0.007	No
12. Main Street and 9 th Street	0.742	C	0.743	C	0.001	No

*LOS = level of service; V/C = volume-to-capacity ratio
Source: Alexan South Broadway Project Traffic Study, The Mobility Group, August 3, 2015.*

the Project, and identify if the increase constitutes a significant impact. As shown in Tables III-34, all 12 intersections are anticipated to operate at LOS A or LOS B with the addition of traffic from the Modified Project during the AM peak hour. The analysis summarized in Table III-35 shows that all intersections range from LOS A to LOS D. The addition of the Project traffic would not cause the LOS to change at any study intersection and increases in V/C ratios would be less than the threshold for a significant impact

to occur. The Project would not cause any significant traffic impact either the AM or PM peak hour for future with Project conditions.

Construction Traffic

The Modified Project would require the use of haul trucks during site clearing and excavation, and the use of a variety of other construction vehicles throughout the construction of the Modified Project. It is anticipated that the site clearing phase would necessitate the removal of approximately 500 cubic yards of asphalt and debris. Preparation of the proposed building footings and structural foundation would require the excavation and export of up to 30,752 cy of soil. The local haul route from the 110 Freeway would utilize 9th Street and S. Hill Street. Both are designated as Modified Secondary Highways. Traveling from the Project Site to the 110 Freeway, the haul route would utilize 8th Street, a one-way westbound street, which is designated as a Secondary Highway. As noted in Regulatory Compliance Measure RC-TRAFFIC-1, the haul route specified above may be modified in compliance with applicable City policies, provided DOT and/or Street Services approves any such modification. Assuming the use of 18-wheel bottom-dump trucks with a 20 cubic yard hauling capacity (i.e., 30 tons maximum gross weight), it is estimated that the hauling activities would result in approximately 39 haul trips a day for a duration of 40 days. The addition of these vehicles onto the street system would temporarily contribute to increased traffic in the Project vicinity. However, the Modified Project's construction trip traffic would be a fraction of the operational traffic that would not cause any significant impacts at the studied intersections. Therefore, it is not anticipated that haul trips would contribute to a significant increase in the overall congestion in the Project vicinity. In addition, any truck trips would be limited to the length of time required for the Project's construction and haul trips would occur outside of the peak hours, as may be conditioned by the Department of Transportation and/or Building and Safety. With respect to pedestrian access in the project area during construction of the Modified Project, implementation of Project Design Features PDF-TRAFFIC-1 and PDF-TRAFFIC-2 would ensure adequate and safe pedestrian circulation on adjacent sidewalks throughout all construction phases. Due to the temporary nature of the traffic, construction impacts would be less than significant with the incorporation of the Project Design Features and Regulatory Compliance Measure below.

Project Design Features:

PDF-TRAFFIC-1 Construction Management Plan

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

PDF-TRAFFIC-2 Pedestrian Safety

- The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic, and overhead protection, due to sidewalk closure or blockage, at all times.
- Should permanent pedestrian routes be unavailable due to construction, safe and accessible temporary pedestrian routes shall be provided adjacent to the project site.
- Covered walkways should be provided where pedestrians are exposed to potential injury from falling objects.
- The Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction and/or construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

Regulatory Compliance Measures:**RC-TRAFFIC-1 Transportation (Haul Route)**

- (Non-Hillside): Projects involving the import/export of 20,000 cubic yards or more of dirt shall obtain haul route approval by the Department of Building and Safety.

CMP Analysis

The Los Angeles County Congestion Management Program (CMP) requires that new development projects analyze potential project impacts on CMP monitoring locations, if an EIR is prepared for the project. As an EIR is not being prepared for the Modified Project, no CMP analysis is required. Nevertheless, for purposes of preparing a comprehensive study, a check was conducted against CMP Criteria.

When a CMP analysis is needed, the CMP methodology requires that the Traffic Study analyze traffic conditions at all CMP arterial monitoring intersections where the project will add 50 or more trips during either the AM or PM weekday peak hours of adjacent street traffic. The CMP also requires that traffic studies analyze mainline freeway monitoring stations where the project will add 150 or more trips in either direction during the AM or PM weekday peak hours. If, based on these criteria the Traffic Study identifies no facilities for study, then no further traffic analysis is required.

As shown in Table III-28 above, the Modified Project would generate 137 AM peak hour trips and 184 PM peak hour trips. A review of the 2010 CMP indicated the following arterial monitoring stations that are closest to the Project Site:

- Washington Boulevard and Alameda Street
- Wilshire Boulevard and Alvarado Street

- Sunset Boulevard and Alvarado Street

These intersections are located some considerable distance from the Project Site (between 1.5 and 2.4 miles). Nevertheless, the number of project vehicle trips expected to pass through these intersections was estimated based on the project trip generation and project trip distribution.

	<u>AM/PM</u>
• Washington Boulevard and Alameda Street	0/0
• Wilshire Boulevard and Alvarado Street	3/3
• Sunset Boulevard and Alvarado Street	0/0

As the volumes are less than the CMP threshold of 50 in both the AM or PM peak hours at all these intersections, no further analysis is necessary.

CMP Freeway Monitoring Stations

A review of the 2010 CMP also indicated the following freeway monitoring stations that are closest to the Project Site. The number of project vehicle trips expected to pass through these stations was again estimated based on the project trip distribution and the project trip generation and is shown below:

	<u>AM/PM</u>
• I-10 at Budlong Avenue	12/14
• I-10 east of LA city limit	5/6
• SR-60 east of Indiana Street	5/6
• US-101 north of Vignes Street	5/6
• SR-110 south of US-101	16/18
• SR-110 north of Alpine Street	8/9

The number of project trips would not exceed the CMP threshold of 150 trips in anyone direction at any of these freeway monitoring locations closest to the Project Site during either the AM or PM weekday peak hours. No further analysis is therefore necessary, and there would be no significant CMP freeway impacts.

Transit Analysis

The number of transit trips that would be generated by the Modified Project was estimated based on the trip generation methodology described above. The estimate of base vehicle trips (unadjusted) for each Project land use (from Table III-28) was converted to person trips by applying a conversion factor of 1.4, as per CMP guidelines. The person trip numbers were then multiplied by the estimated percent taking transit for each land use. These numbers are higher in some cases than the default countywide guidelines in the CMP but are more accurate in this instance as they reflect the higher transit use that would occur for the Modified Project because of its downtown location. Because of the nature of the Modified Project land uses, there would be a higher number of transit trips in the PM peak hour.

There would be approximately 35 net additional transit trips (8 inbound and 27 outbound) in the AM peak hour due to the Modified Project and approximately 48 net additional transit trips (32 inbound and 16 outbound) in the PM peak hour (as shown in Table 4.4 of the Traffic Study).

The peak capacity of the transit system serving the Project Site is approximately 27,118 persons (as shown in Table 4.5 of the Traffic Study). The highest directional volume of peak hour trips added by the Project would be 30 trips. As this would be only about 0.1% of the total transit capacity, it is concluded that the Modified Project would not cause the capacity of the transit system to be substantially exceeded and therefore that the Project would not create any significant impacts on the transit systems serving the Project Area and downtown Los Angeles.

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

A significant impact would occur if the project conflicts 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.

Original Project

Less Than Significant Impact. The Original Project would not meet or exceed trip thresholds at any CMP monitoring locations and no detailed CMP intersection analysis is warranted. Since the Original Project would generate 70 and 102 total trips during the AM and PM peak hour respectively, new trips would not be sufficient to exceed the 150-trip threshold prescribed by the CMP for a freeway segment analysis. Consequently, the Original Project would not generate peak hour trips that exceed CMP requirements for further study, and as such, would not exceed, or cumulatively contribute to an exceedance of a level of service standard established by the county congestion management agency for designated roads or highways.

Modified Project

Less Than Significant Impact. As discussed above, the study area analyzed in the Traffic Impact Study includes the 12 intersections listed above. None of these intersections are Los Angeles County Congestion Management Plan (CMP) monitoring locations. In addition, a CMP analysis is not required because like the Original Project, the Modified Project would not add 50 or more peak-hour trips to any CMP arterial monitoring intersections, including freeway on- and off-ramps. Furthermore, the project would not add 150 or more peak-hour trips to freeway mainline monitoring locations. As such, the Modified Project would not conflict with the adopted CMP and project impacts would be less than significant.

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

Original Project

No Impact. The nearest major airport to the Project Site is the Los Angeles International Airport, which is located approximately 11 miles southwest. Based on the International Airport's land use plan, the Project Site is not located within the Planning Boundary of this facility. The project would have no impact in regard to airport traffic.

Modified Project

No Impact. This question would apply to the Modified Project only if it involved an aviation-related use or would influence changes to existing flight paths. The Modified Project does not include any aviation-related uses and would have no impacts to air traffic patterns. It would also not require any modification of flight paths for the existing airports in Los Angeles. Therefore, no impact would occur.

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

A significant impact may occur if the project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazardous conditions.

Original Project

No Impact. There are no existing hazardous design features such as sharp curves or dangerous intersections associated with the Original Project or within the project vicinity. The Original Project would not require the creation of any such design hazards nor include any uses that are incompatible with normal traffic operations. Full service driveways along Hill Street and 9th Street would provide access to the Project Site. Since the Original Project would not substantially increase hazards or introduce hazardous or incompatible uses, no significant impacts would occur.

Modified Project

No Impact. The Modified Project would not include unusual or hazardous design features. Current vehicular access to the Project Site is provided by one two-way driveway located along 9th Street and one driveway along S. Hill Street. The Modified Project would include one two-way driveway located off of S. Hill Street and one two-way driveway located off of 9th Street. As such the Modified Project would not introduce new vehicular access driveways that could potentially conflict with pedestrian circulation and traffic. Therefore, the Project would not substantially increase hazards due to design features or incompatible uses and no impact would occur.

e) Would the project result in inadequate emergency access?

A significant impact may occur if the Project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses.

Original Project

Less Than Significant Impact. The Original Project would be designed to permit adequate emergency access to the Project Site, in accordance with Los Angeles Fire Department street and driveway standards. With incorporation of Mitigation Measures 38, 39, 59, 60 and 65 the Original Project would result in a less than significant impact with respect to emergency access.

Modified Project

Less Than Significant Impact. As previously discussed in Section 7(h), the Modified Project is not located on or near an adopted emergency response or evacuation plan. Development of the Project Site may require temporary and/or partial street closures due to construction activities. However, any such closures would be temporary in nature and would be coordinated with the Departments of Transportation, Building and Safety, and Public Works. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. Therefore, the impacts would be less than significant.

As described in Section 14(a), the Modified Project would satisfy the emergency response requirements of the LAFD. There are no hazardous design features included in the access design or site plan for the Modified Project that could impede emergency access. Furthermore, the Modified Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. Therefore, similar to the Original Project, with incorporation of Mitigation Measures 38, 39, 59, 60, 65 and Project Design Features PDF-TRAFFIC-1 and PDF-TRAFFIC-2 impacts associated with vehicle and pedestrian circulation during construction would be reduced to to a less than significant level. As such, the Modified Project would not be expected to result in inadequate emergency access, and the impact would be less than significant.

f) Result in inadequate parking capacity?

A significant impact may occur if the proposed project would result in an inadequate parking capacity based on City Code and/or City Planning Department Deputy Advisory Agency requirements.

Original Project

Less Than Significant Impact. Parking for the Original Project would be provided on- site in two levels of subterranean parking and up to three at-/above-grade levels within an enclosed, secured parking structure. The Original Project would include approximately 259 parking spaces for residential units. At the time the 2007 IS/MND was prepared, the Original Project was subject to provide parking pursuant to

the Residential Parking Policy for Division of Land- No. AA 2000-1 (May, 2000), which identifies a standard of two parking spaces per dwelling unit and 0.25 space for guest parking in non-parking congested areas for condominium projects. As such, the Original Project would be required to provide 376 parking spaces for the proposed 167 condominiums. However, the 2007 IS/MND concluded that because the Project Site is located to numerous bus transit lines and Metro stations and that the Project Site is within walking distance to jobs and amenities, many trips can be made by transit and walking and there is less need for a car in a downtown environment and therefore less of a need for parking. Therefore, the Applicant of the Original Project requested permission to deviate from the Advisory Agency residential parking Policy No. AA 2000-1. Because the Original Project would provide 1.55 spaces per residential unit, consistent with many other recently approved downtown residential projects, it was concluded that an adequate parking supply would be provided by the Original Project and impacts would be less than significant.

Modified Project

Less Than Significant Impact. The Modified Project meets all of the requisite criteria of a Transit Oriented Infill Project pursuant to SB 743. SB 743, now codified as law under Public Resources Code 21099 provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Accordingly, the Modified Project’s parking impacts shall not be considered significant impacts on the environment as a matter of law under Public Resources Code Section 21099. The following impact discussion is provided for informational purposes only.

Parking for the retail and residential uses on-site would be provided in one subterranean level, at grade and levels two through five. Level five would support additional parking behind habitable space fronting Hill Street and 9th Street. Similar to the Original Project, vehicular access to the Project Site would be provided via two ingress/egress driveways with one located on S. Hill Street and one located on W. 9th Street. The Project Site is located within the Central City Parking Exception area (LAMC Section 12.21 A 4 (p)), which permits one (1) space for each dwelling unit, except where there are more than six (6) dwelling units of more than three (3) habitable rooms per unit on any lot, the ratio of parking spaces required for all of such units shall be at least one and one-quarter (1¼) parking spaces for each dwelling unit of more than three (3) habitable rooms. Additionally, pursuant to the Downtown Business parking Exception (LAMC Section 12.21A.(4)(i)(3)), no parking is required for retail spaces less than 7,500 square feet. As summarized in Table II-3 of the Project Description, the Modified Project would be consistent with the applicable parking requirements of the LAMC. The Modified Project would require a total of 321 residential parking spaces. A total of 336 parking spaces would be provided. The Modified Project would additionally provide on-site bicycle parking in bicycle storage spaces located on the first level. As such, the Modified Project would be consistent with the applicable parking requirements of the LAMC for vehicle and bicycle parking spaces and a less than significant impact would occur.

g) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

A significant impact may occur if the Modified Project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site.

Original Project

Checklist question XVI. (f) was not previously analyzed in the 2007 IS/MND. However, the Original Project did not propose bicycle parking or bicycle storage on site. As such, the Original Project would conflict with the current bicycle-parking ordinance.

Modified Project

Less Than Significant Impact. The Modified Project would not require the disruption of public transportation services or the alteration of public transportation routes. The Modified Project would not interfere with any class I or class II bikeway systems. The Project Site is located in a highly urbanized area of Downtown Los Angeles within a Transit Priority Area (as defined by CEQA). The Modified Project would develop new residential and commercial uses in walking distance to numerous services, retail, and employment opportunities. Additionally, the Project Site is located within ½ mile of two existing rail transit stations, the 7th Street Metro rail transit station, and the Pershing Square Metro Rail transit station. The Project Site is also located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. Additionally, the Modified Project would provide 343 bicycle parking space on site. The location of the Modified Project encourages a variety of transportation options. The Modified Project would include sidewalk and landscaping improvements along Hill Street and 9th Street, which would enhance the pedestrian experience. The sidewalk fronting Hill Street would be 18 feet wide. Two street trees would remain in place and one street tree would be relocated. The sidewalk fronting 9th Street would 22 feet wide. Two existing street trees on 9th Street would remain in place. Furthermore, Project Design Features PDF-TRAFFIC-1 and PDF-TRAFFIC-2 would reduce to impacts associated with vehicle and pedestrian circulation during construction to a less than significant level. Since the Modified Project would not modify or conflict with any alternative transportation policies, plans or programs, or safety of such facilities, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Modified Project in conjunction with the 84 related projects would result in an increase in average daily vehicle trips and peak hour vehicle trips in the Central City Community Plan Area. As noted in Table III-30 and III-31, above, all increases in V/C ratios in the AM peak hour and PM peak hour as a result of related project and cumulative growth would be less than the threshold for a significant impact to occur and the Modified Project's contribution to cumulative impacts is less than significant for all of the study intersections analyzed. Furthermore, with respect to potential cumulative impacts on CMP monitoring locations, CMP freeway monitoring stations, public transit service, and bicycle and pedestrian access and circulation, each related project would be analyzed

on a case-by-case basis and reviewed in conjunction with LADOT. Development of the related projects is expected to occur in accordance with adopted traffic plans and regulations as applicable. Therefore, the Modified Project's cumulative impact is considered less than significant.

XVII. UTILITIES AND SERVICE SYSTEMS

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

A significant impact would occur if a project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board. Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge (ROWD) containing information which may be required by the appropriate Regional Water Quality Control Board (RWQCB). The RWQCB then authorizes an NPDES permit that ensures compliance with wastewater treatment and discharge requirements. The Los Angeles RWQCB (LARWQCB) enforces wastewater treatment and discharge requirements for properties in the Project area.

Original Project

Less Than Significant Impact. Any wastewater generated by the Project Site would be treated at the Hyperion Treatment Plant (HTP). Based on its current projections through the year 2010, it is forecasted that the HTP would be able to meet future needs. Although no significant impacts associated with sewage treatment capacity are anticipated, the implementation of mitigation measures and compliance with water conservation measures, such as those required by Titles 20 and 24 of the California Administrative Code, would further reduce the less than significant wastewater impacts of the project.

Mitigation Measures:

73. The Applicant shall comply with City ordinances limiting connections to the City sewer system, in accordance with City Bureau of Sanitation procedures.
74. The Applicant shall install low-flow water fixtures and further encourage reduction of water consumption to minimize wastewater flow to the sewer system, in accordance with City water conservation requirements.

Modified Project

Less Than Significant Impact. Wastewater from the Project Site is conveyed via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the HTP. The HTP is a public facility and is subject to the State's wastewater treatment requirements. Wastewater from the Project Site is and would continue to be treated according to the wastewater treatment requirements enforced by the LARWQCB. Mitigation Measure 73 and 74 of the Original Project are included in this Addendum. Therefore, impacts associated with wastewater treatment requirements would be less than significant.

Mitigation Measures:

73. The Applicant shall comply with City ordinances limiting connections to the City sewer system, in accordance with City Bureau of Sanitation procedures.
74. The Applicant shall install low-flow water fixtures and further encourage reduction of water consumption to minimize wastewater flow to the sewer system, in accordance with City water conservation requirements.

Cumulative Impacts

Less Than Significant Impact. As discussed further in Checklist Question XVII. (e), and shown in Table III-39, the Modified Project, in combination with the related projects would generate approximately 6,981,174 gpd of wastewater, which is within the available capacity of the HTP. Similar to the Modified Project, each related project would be evaluated on a case-by-case basis and would be required to consult with the Bureau of Sanitation and comply with all applicable city and state water conservation programs and sewer allocation ordinances. As the Modified Project not make a cumulatively considerable impact to wastewater services, cumulative impacts would be less than significant.

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

A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

Original Project

Less Than Significant Impact. The Original Project would generate demand for wastewater services for approximately 167 residential units. The Original Project would result in an estimated average wastewater generation of approximately 23,288 gallons per day (gpd). This average increase would represent 0.5 of the permitted annual flow increase of five mgd for the HTP. The Original Project would not require or result in the construction of major, new water or wastewater treatment facilities or the expansion of existing treatment facilities. Based on available information provided by the Los Angeles Bureau of Engineering for the Original Project, adequate capacity is available in the existing conveyance system from the site to the existing mains.

Construction of local lines in street rights-of-way may result in impacts on street access. These impacts have been addressed in Mitigation Measures 38 and 39, which require the Project Applicant to develop and implement a Police and Fire Department notification plan of any construction within the 9th Street or Hill Street right-of-ways, or any use of the adjacent right-of-ways. With the implementation of prior mitigation measures and the following recommended measures, the impact of the project relative to existing water and wastewater facilities is expected to be less than significant.

Mitigation Measures:

75. Any required connections or mains shall be designed by a registered civil engineer and approved by the Los Angeles Department of Public Works, Bureau of Engineering. Any construction within the public right-of-way shall be approved by the Los Angeles Department of Transportation.

Modified Project

Less Than Significant Impact.

Water Treatment Facilities and Existing Infrastructure

The Los Angeles Department of Water and Power (LADWP) ensures the reliability and quality of water supply through an extensive distribution system that includes more than 7,100 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd).⁵⁵ The average plant flow is approximately 450 mgd during the non-summer months and 550 mgd during the summer months, and operates at between 75 and 90 percent capacity. Therefore, the LAAFP has a remaining capacity of treating approximately 50 to 150 mgd, depending on the season.⁵⁶

As shown in Table III-36, the Modified Project would generate a net increase in water demand of approximately 49,984 gallons per day (gpd) of water, which results in a net increase of 22,038 gpd, as compared to the Original Project. However the water demand for the Modified Projects represents a fraction of one percent of the available capacity. Because the Modified Project is consistent with the zoning and General Plan land use designations, and the Project's population growth is within SCAG's forecast, the Project's increased water demand would not measurably reduce the LAAFP's treatment capacity; therefore, no new or expanded water treatment facilities would be required. With respect to water treatment facilities, the Modified Project would have a less-than-significant impact.

⁵⁵ Los Angeles Department of Water and Power, website: <http://wsoweb.ladwp.com/Aqueduct/historyoflaa/waterquality.htm>, accessed September 2015.

⁵⁶ Los Angeles Department of Water and Power, website: <http://www.ladwp.com/>, accessed August 2015.

**Table III-36
Modified Project Estimated Water Demand**

Type of Use	Size	Water Demand Rate (gpd/unit) ^a	Total Water Demand (gpd)
Existing Uses			
Surface Parking Lot ^b	0	0 gpd/sf	0
Modified Project			
Residential Units (305 total du)			
Studio	59 du	96 gpd/du	5,664
One Bedroom	183 du	144 gpd/du	26,352
Two Bedroom	63 du	192 gpd/du	12,096
Commercial			
Ground-Floor Retail	2,671 sf	96 gpd/1,000 sf	256
Restaurant ^c	3,500 sf (156 seats)	36 gpd per seat	5,616
Total Project Water Demand			49,984
<i>Notes:</i> <i>sf = square feet; du = dwelling units; gpd = gallons per day</i> ^a L.A. CEQA Thresholds Guide (2006), Exhibit M.2-12. Water consumption is assumed to be 120% of wastewater generation. ^b For a more conservative analysis, the Project Site is analyzed as being fully developed as a surface parking lot. ^c For a more conservative estimate, this analysis assumes 3,500 sf of restaurant space. Seats for restaurant were estimated based on 15 sf per seat within the occupancy area, which was assumed to be two-thirds of the total floor area. Approximately one-third of the floor area is allocated to kitchen and storage uses. Source: Parker Environmental Consultants, 2016			

City of Los Angeles substructure maps show that an existing 12-inch LADWP water main in S. Hill Street approximately 10' north of the northern right-of-way. There is also an existing 12-inch LADWP water line approximately 25' south of the southerly right-of-way line. It is anticipated that new meters would be required for development. If it is possible to re-use existing water meters, no water capital facility fee would be required. With the two adjacent water mains, and the level of existing development in the area, it is anticipated that sufficient water pressures and volumes should be available. The required fire and domestic water supply can be provided with suitable pressure for the Modified Project. It is also possible that additional on-site or off-site fire hydrants might be required in order to meet Fire Department regulations for building coverage.⁵⁷

Although no system upgrades are anticipated at this time, the water system would be verified again at the time of construction. In the event that water main and/or other infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be short-term, (b) the replacement of the water mains would be within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. Therefore with implementation of

⁵⁷ PSOMAS, 850 South Hill Street Preliminary Due Diligence Report of Existing Infrastructure, dated February 11, 2015. See Appendix G of this IS/MND Addendum.

Mitigation Measures 38, 39 and 75 from the Original Project potential impacts resulting from water infrastructure improvements would be less than significant.

Mitigation Measures:

75. Any required connections or mains shall be designed by a registered civil engineer and approved by the Los Angeles Department of Public Works, Bureau of Engineering. Any construction within the public right-of-way shall be approved by the Los Angeles Department of Transportation.

Wastewater Treatment Facilities and Existing Infrastructure

Based upon the criteria established in the L.A. CEQA Thresholds Guide, a project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

The Los Angeles Bureau of Sanitation provides sewer service to the Modified Project area. Sewage from the Project Site is conveyed via sewer infrastructure to the Hyperion Treatment Plant (HTP).⁵⁸ The Hyperion Treatment Plant treats an average daily flow of 362 million gallons per day (mgd), and has capacity to treat 450 mgd.⁵⁹ This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP. As shown in Table III-37, the Modified Project would generate approximately 41,654 gpd of wastewater, which results in a net increase of 18,366 gpd as compared to the Original Project. This estimated wastewater generation represents a fraction of one percent of the available capacity at the HTP. In accordance with the *L.A. CEQA Thresholds Guide*, the estimated sewer flows were based on the sewerage generation factors for residential and commercial categories (City of Los Angeles, Bureau of Sanitation, 1996). The HTP has a remaining capacity of 88 additional mgd, and as such would have adequate capacity to serve the Project Site. Therefore, impacts to sewer capacity and infrastructure would be less than significant.

From record drawings and the City of Los Angeles Navigate LA website, there are two existing main trunk sewer lines adjacent to the Project Site. Within S. Hill Street there is currently a 24-inch Vitrified Clay Pipe (VCP) sewer main that sits approximately at the centerline of S. Hill Street, west of the Project Site property line. This line travels south within S. Hill Street where an existing 8-inch VCP sewer main within 9th Street joins it. This line runs north within 9th Street and sits approximately 45 feet south of the site property line. In order to determine whether or not the existing sewer systems have capacity to service

⁵⁸ *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Treatment Plant, website: http://www.lasewers.org/treatment_plants/hyperion/index.htm, accessed August 2015.*

⁵⁹ *City of Los Angeles Department of Public Works, Bureau of Sanitation, Wastewater: About Wastewater, website: <http://www.lacitysan.org/wastewater/factsfigures.htm>, accessed August 2015.*

the proposed development a formal sewer capacity availability request (SCAR) has been submitted to the City of Los Angeles. The result of this request has confirmed available capacity. It may be noted that due to connection to a major sewer line an additional trap structure is required on this connection line. The existing public sewer on S. Hill Street has adequate capacity for the Modified Project.⁶⁰

**Table III-37
Modified Project Estimated Wastewater Generation**

Type of Use	Size	Wastewater Demand Rate (gpd/unit) ^a	Total Wastewater Demand (gpd)
Existing Uses			
Surface Parking Lot ^b	0	0 gpd/du	0
Modified Project			
Residential Units (305 total du)			
Studio	59 du	80 gpd/du	4,720
One Bedroom	183 du	120 gpd/du	21,960
Two Bedroom	63 du	160 gpd/du	10,080
Commercial			
Ground-Floor Retail	2,671 sf	80 gpd/1,000 sf	214
Restaurant ^c	3,500 sf (156 seats)	30 gpd per seat	4,680
Total Project Wastewater Generation			41,654
<i>Notes:</i> ^s <i>sf</i> =square feet; <i>du</i> = dwelling units, <i>gpd</i> : gallons per day ^a L.A. CEQA Thresholds Guide (2006), Exhibit M.2-12. ^b For a more conservative analysis, the Project Site is analyzed as being fully developed as a surface parking lot. ^c For a more conservative estimate, this analysis assumes 3,500 sf of restaurant space. Seats for restaurant were estimated based on 15 sf per seat within the occupancy area, which was assumed to be two-thirds of the total floor area. Approximately one-third of the floor area is allocated to kitchen and storage uses. Source: Parker Environmental Consultants, 2016			

Cumulative Impacts

Less Than Significant Impact. As discussed further in Checklist Question XVII. (d), and shown in Table III-38, development of the Modified Project and related projects and the cumulative growth throughout the City of Los Angeles, would further increase the demand for potable water within the City. As shown in Table III-38, Projected Cumulative Water Consumption, the Modified Project and related projects would cumulatively consume approximately 8,377,412 gallons of water per day. The additional water demands generated by the Modified Project, in combination with the related projects, is accounted for in the 2010 Water Management Plan and impacts associated with increased water demand would be less than significant. In addition, as discussed further in Checklist Question XVII. (e), and shown in Table III-39, the Modified Project, in combination with the related projects would generate approximately 6,981,174 gpd of wastewater, which is within the available capacity of the HTP. Similar to the Modified Project, each related project would be evaluated on a case-by-case basis and would be required to consult with the Bureau of Sanitation and comply with all applicable city and state water conservation programs

⁶⁰ PSOMAS, 850 South Hill Street Preliminary Due Diligence Report of Existing Infrastructure, dated February 11, 2015. See Appendix G of this IS/MND Addendum.

and sewer allocation ordinances. As the Modified Project not make a cumulatively considerable impact to wastewater services, cumulative impacts would be less than significant

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

A significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a Project Site, resulting in the construction of new stormwater drainage facilities. As described in Section 9(c) the Modified Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns.

Original Project

Less Than Significant Impact. At the time the 2007 IS/MND was prepared the Project site was 100 percent impermeable. It is anticipated that the existing storm drains have adequate capacity to absorb the existing storm water runoff from the Project Site, as well as stormwater pipes and connections linking the Original Project to the regional conveyance system. Therefore, the impact of the Original Project on the existing stormwater conveyance system would be less than significant.

Modified Project

Less Than Significant Impact. The Modified Project would be required to demonstrate compliance with Low Impact Development Ordinance standards and retain or treat the first $\frac{3}{4}$ -inch of rainfall in a 24-hour period. The Modified Project Site is currently developed with a surface parking lot. Runoff from the Project Site currently is and would continue to be directed towards existing storm drains in the Project vicinity. As stated previously in response to Checklist Question IX, the Project shall comply with the LID Plan, Standard Urban Stormwater Mitigation Plan (SUSMP) and/or the site-specific mitigation plan to mitigate stormwater pollution as required by Ordinance Nos. 172,176 and 173,494. The appropriate design and application of Best Management Practices (BMP) devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works. Thus, development of the Modified Project would not create or contribute to runoff water, which may exceed the capacity of existing or planned stormwater drainage systems. Therefore, Project impacts would be considered less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Modified Project in combination with the related projects would result in the further infilling of uses in a highly developed area within Downtown Los Angeles. The Project Site and the surrounding areas are served by the existing County storm drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Modified Project and the related project sites, since Downtown Los Angeles is highly

developed with impervious surfaces. Under the requirements of the LID Ordinance, each related project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¼-inch of rainfall in a 24-hour period. Mandatory structural BMPs in accordance with the NPDES water quality program would therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Modified Project would not make a cumulatively considerable contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. Therefore, cumulative water quality impacts would be less than significant.

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

A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

Original Project

Less Than Significant Impact. Since Original Project would be consistent with the Community Plan's designated land use and the entitled land use under the existing zoning, it is expected that sufficient water would be available to the DWP, under existing entitlements, to serve the Project Site. The Original Project would result in a demand for approximately 27,946 gpd of water. Compliance with state water conservation laws, including relevant provisions of Title 20 and Title 24 of the California Government Code, would result in a reduction of water consumption estimates at build out, and in turn, a reduction in the demand on city supplies. Total estimated water demand for the Original Project at buildout would not exceed available supplies or the available capacity within the distribution infrastructure that would serve the Project Site. Therefore, the impact of the project in relation to water demand would be less than significant. Although no significant impacts associated with water consumption are anticipated, the implementation of Mitigation Measures would further reduce the less than significant water demand of the project.

Mitigation Measures:

76. Prior to the issuance of a building permit, the applicant shall consult with LADWP to identify feasible and reasonable measures that reduce water consumption per City adopted UBC requirements.

77. The project shall incorporate Phase I of the City of Los Angeles Emergency Water Conservation Plan.
78. The project shall comply with any additional mandatory water use restrictions imposed as a result of drought conditions.
79. Automatic sprinkler systems shall be installed to irrigate landscaping during morning hours or during the evening to reduce water losses from evaporation. Sprinklers shall be reset to water less often in cooler months and during the rainfall season, so that water is not wasted in excessive landscape irrigation.
80. Prior to issuance of building permits, the Applicant shall pay any appropriate fees imposed by the Building and Safety Department. A percentage of building permit fees is contributed to the fire hydrant fund, which provides for citywide fire protection improvements.

Modified Project

Less Than Significant Impact. The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District (MWD) of Southern California, which is obtained from the Colorado River Aqueduct. The MWD utilizes a land-use based planning tool that allocates projected demographic data from the SCAG into water service areas for each of MWD's member agencies. The 2010 Urban Water Management Plan, which estimates future demand based on population and growth estimated reported in SCAG's 2012 RTP/SCS, projects a total water demand and supply of 710,800 AFY in 2035. With its current water supplies, planned future water conservation, and planned future water supplies, LADWP would be able to reliably provide water to its customers through the 25-year planning period covered by the 2010 UWMP. In response to current drought conditions, the State Water Board has implemented mandatory water reductions in urban areas to reduce potable urban water usage by 25% statewide. The State's mandated conservation targets for the City of Los Angeles is to reduce water consumption by 16 percent each month over a nine-month period, from June 2015 through February 2016, as compared to the amount of water use during those months in 2013.⁶¹ Furthermore, the Mayor's Executive Directive No. 5 calls for a 20 percent reduction in water use per capita by 2017.⁶² Through various conservation strategies, the LADWP would be able to reduce the City's water demand during dry years to respond to any reductions to water supplies during multiple dry years.

As shown in Table III-36, the Modified Project's net increase in water demand would be 49,984 gallons per day, which results in a net increase of 22,038 gpd, as compared to the Original Project.. The Modified

⁶¹ LADWP Newsroom, August 27, 2015, website:<http://www.ladwpnews.com/go/doc/1475/2589378/Mayor-Garcetti-Announces-LA-City-Surpasses-State-Water-Conservation-Target>, accessed February 2016.

⁶² City of Los Angeles, Mayoral Executive Directive No.5, website http://www.lamayor.org/executive_directive_5_emergency_drought_response_creating_a_water_wise_city, accessed February 2016.

Project is consistent with the allowable land uses and density that are planned for the Project Site and is therefore within the growth projections of SCAG's 2012 RTP/SCS. Accordingly, the Project's anticipated water demand has been accounted for and would not exceed the water demand estimates of the City's 2010 UWMP. Furthermore, the LADWP has indicated that it can supply water to the Modified Project from the municipal system subject to the Water System rules of the LADWP.⁶³ Thus, the Modified Project would have a less-than-significant impact on water demand. In addition, pursuant to LAMC Section 122.03(a), the Modified Project is required to utilize water saving devices including, but not limited to, urinals equipped with flush-o-meter valves, which flush with a maximum of 1.28 gallons, which would further reduce impacts associated with this issue to a level that is less than significant. Environmental impacts would further be reduced by implementation of Mitigation Measures 76 through 79 of the Original Project. Additionally, Mitigation Measure 76 has been updated to reflect current building code compliance for the City of Los Angeles since the California Building Code (CBC) has replaced the UBC pursuant to City law.

Mitigation Measures:

76. Prior to the issuance of a building permit, the applicant shall consult with LADWP to identify feasible and reasonable measures that reduce water consumption per City adopted ~~UBC~~ California Building Code requirements.
77. The project shall incorporate Phase I of the City of Los Angeles Emergency Water Conservation Plan.
78. The project shall comply with any additional mandatory water use restrictions imposed as a result of drought conditions.
79. Automatic sprinkler systems shall be installed to irrigate landscaping during morning hours or during the evening to reduce water losses from evaporation. Sprinklers shall be reset to water less often in cooler months and during the rainfall season, so that water is not wasted in excessive landscape irrigation.
80. Prior to issuance of building permits, the Applicant shall pay any appropriate fees imposed by the Building and Safety Department. A percentage of building permit fees is contributed to the fire hydrant fund, which provides for citywide fire protection improvements.

Cumulative Impacts

Less Than Significant Impact. Development of the Modified Project and related projects and the cumulative growth throughout the City of Los Angeles, would further increase the demand for potable water within the City. As shown in Table III-38, Projected Cumulative Water Consumption, the Modified

⁶³ See *Water Availability - Will Serve* correspondence from Hugo A. Torres, LADWP to Mr. David Martin, PSOMAS, dated September 11, 2014 included in Appendix G to this Addendum.

**Table III-38
Projected Cumulative Water Consumption**

Land Use	Size	Units	Consumption Rate (Gallons/Unit/Day)	Total Water Consumed (Gallons/Day)
Auditorium	450	seat	4.80	2,160
Bar/Cocktail Lounge	7,192	sf	0.60	4,315
Conference Room	345,706	sf	0.18	62,227
Health Club/Spa	93,670	sf	0.96	89,923
Hotel	3,255	room	156	507,780
Medical Building	150,000	sf	0.30	45,000
Museum	49,600	sf	0.024	1,190
Office Building	7,457,144	sf	0.18	1,342,286
Residential: Apartment ^a	16,007	du	192	3,073,344
Residential: Condominium ^b	10,875	du	192	2,088,000
Restaurant ^c	21,289	seat	36	766,411
Retail	1,981,677	sf	0.096	190,241
School: Daycare	91	student	9.6	878
School: Trade or Vocational	6,300.0	student	14.40	90,720
School: University	1,400	student	21.6	30,240
Studio: Film/TV	298,500.0	sf	0.096	28,656
Theater	845	seats	4.8	4,056
Related Projects Total:				8,327,428
Modified Project Net Total:				49,984
Cumulative Total:				8,377,412
Modified Project Percent of Cumulative:				1%
<i>Notes: Consumption Rates based on 120% of the City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, March 20, 2002.</i> <i>Uses not listed are estimated by the closest type of use available in the table.</i> ^a Consumption Rate was based on 2 bedrooms per unit as a conservative estimate. ^b Consumption Rate was based on 2 bedrooms per unit as a conservative estimate. ^c Seats for restaurant were estimated based on 15 sf per seat within the occupancy area, which was assumed to be two-thirds of the total floor area. Approximately one-third of the floor area is allocated to kitchen and storage uses. Source: Parker Environmental Consultants, 2015.				

Project and related projects would cumulatively consume approximately 8,377,412 gallons of water per day. The Modified Project represents less than one percent of the cumulative total. Through the 2010 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2035. This estimate is based in part on demographic projections obtained for the LADWP service area from the Metropolitan Water District (MWD). The MWD utilizes a land-use based planning tool that allocates projected demographic data from the Southern California Association of Governments (SCAG) into water service areas for each of MWD's member agencies. MWD's demographic projections use data reported in SCAG's 2008 Regional Transportation Plan (RTP). As discussed previously in this section under the Population and Housing subheading, the Modified Project contributes to population and housing growth in Central City CPA beyond what was projected for 2010. Nevertheless, the Modified Project's growth is consistent with SCAG's growth projections for the Los Angeles subregion. Furthermore, the Modified Project is consistent with the underlying allowable uses per the LAMC and would not exceed the allowable density for the Project Site. As such, the

additional water demands generated by the Modified Project, in combination with the related projects, is accounted for in the 2010 Water Management Plan and impacts associated with increased water demand would be less than significant.

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

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

Original Project

Less Than Significant Impact. The Original Project would be integrated into the City of Los Angeles wastewater treatment system under the yearly allotment program. As stated above, the Hyperion Treatment Plant would have adequate capacity to serve the Original Project. Any impacts associated with wastewater treatment would be less than significant.

Modified Project

Less Than Significant Impact. Similar to the Original Project and as stated in Checklist Question XVII(b), above, the sewage flow would ultimately be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the Modified Project.⁶⁴ Therefore, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Implementation of the Modified Project in conjunction with the related projects would further increase demands for sewer service. As discussed in Question XVII (b), sewage from the Project Site is conveyed via sewer infrastructure to the Hyperion Treatment Plant (HTP). The HTP treats an average daily flow of 362 million gallons per day (mgd), and has capacity to treat 450 mgd. This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP. As shown in Table III-39, the Modified Project, in combination with the related project would generate approximately 6,981,174 gpd of wastewater, which is within the available capacity of the HTP. Additionally, the City conducts several levels of planning studies to assess current capacity and future capacity needs, which includes the Wastewater Integrated Resources Plan (WIRP), which provides a 20-year horizon facilities

⁶⁴ City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Treatment Plant, website: http://www.lasewers.org/treatment_plants/hyperion/index.htm, accessed August 2015.

**Table III-39
Projected Cumulative Wastewater Generation**

Land Use	Size	Units	Consumption Rate (Gallons/Unit/Day)	Total Wastewater Generation (Gallons/Day)
Auditorium	450	seat	4	1,800
Bar/Cocktail Lounge	7,192	sf	0.5	3,596
Conference Room	345,706	sf	0.15	51,856
Health Club/Spa	93,670	sf	0.8	74,936
Hotel	3,255	room	130	423,150
Medical Building	150,000	sf	0.25	37,500
Museum	49,600	sf	0.02	992
Office Building	7,457,144	sf	0.15	1,118,572
Residential: Apartment ^a	16,007	du	160	2,561,120
Residential: Condominium ^b	10,875	du	160	1,740,000
Restaurant ^c	21,289	seat	30	638,673
Retail	1,981,677	sf	0.08	158,534
School: Daycare	91	student	8	731
School: Trade or Vocational	6,300.0	student	12	75,600
School: University	1,400	student	18	25,200
Studio: Film/TV	298,500.0	sf	0.08	23,880
Theater	845	seats	4	3,380
Related Projects Total:				6,939,520
Modified Project Net Total:				41,654
Cumulative Total:				6,981,174
Modified Project Percent of Cumulative:				1%
<p><i>Notes: Generation Rates based the City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, March 20, 2002.</i></p> <p><i>Uses not listed are estimated by the closest type of use available in the table.</i></p> <p>^a <i>Generation Rate was based on 2 bedrooms per unit as a conservative estimate.</i></p> <p>^b <i>Generation Rate was based on 2 bedrooms per unit as a conservative estimate.</i></p> <p>^c <i>Seats for restaurant were estimated based on 15 sf per seat within the occupancy area, which was assumed to be two-thirds of the total floor area. Approximately one-third of the floor area is allocated to kitchen and storage uses.</i></p> <p><i>Source: Parker Environmental Consultants, 2015.</i></p>				

plan.⁶⁵ The population projections in the WIRP Five-Year Review report are based on the SCAG 2008 population projections (adjusted from 2000).⁶⁶

⁶⁵ City of Los Angeles, Sewer System Management Plan, February 2015. Website: http://www.lacitysan.org/lasewers/ssmp/pdfs/SSMP_LA_Regional.pdf, accessed March 2015.

⁶⁶ City of Los Angeles Water IRP 5-Year Review Final Documents, June 2012, website: http://san.lacity.org/irp/documents/FINAL_IRP_5_Year_Review_Document.pdf, accessed March 2015.

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

A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the Solid Waste Management Policy Plan (SWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Original Project

Less Than Significant Impact. The 2007 IS/MND concluded that demolition of the existing asphalt parking lot would generate approximately 716 tons of solid waste and approximately 428 tons of construction debris. With implementation the City's mandatory Construction and Demolition Debris Recycling Program, a minimum of 50 percent of the project-generated construction waste would be diverted. Since there is no anticipated shortfall in disposal capacity for inert waste within the County, the construction of the Original Project would have a less than significant impact on solid waste disposal.

The Original Project's 167 units would generate approximately 668 pounds of solid waste per day. The Original Project's 4,880 square feet of retail space would generate approximately 24.4 pounds of solid waste per day. This estimated increase would constitute less than one percent of the 9.11 million tons of total solid waste (before diversion) generated within the City of Los Angeles annually and disposed of daily at major landfills in the region. Therefore, the Original Project would have a less than significant impact on solid waste disposal during operations. Although concluded to be less than significant, the Original Project's impacts would be further reduced through the implementation of the following Mitigation Measures.

Mitigation Measures:

81. The Applicant shall implement a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction.
82. In order to reduce the deposition of construction materials at solid waste landfills serving the City of Los Angeles, the grading contractor shall identify suitable private sites that accept all fill and earth materials for re-use. Sites in the City currently accepting construction/demolition debris include Browning Ferris Industries Recycling and Transfer Station and Mission Road Recycling

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- and Transfer Station. Documentation of which site(s) is used shall be provided to the Bureau of Engineering, prior to the issuance of haul route permits.
83. A Source Reduction and Recycling Plan (SRRP) shall be developed by the Homeowners Association to the satisfaction of the Bureau of Engineering and Department of Sanitation. This plan shall identify methods to promote recycling and re-use of materials, as well as safe disposal consistent with the policies and programs contained in the City's Source Reduction and Recycling Element and the City's Solid Waste Management Policy Plan. The SRRP shall provide tenants and occupants with the means to recycle and compost materials in a manner that is practical and accessible. Specifically, the SRRP shall include a statement describing the methods by which the designated recyclables shall be separated from the waste stream, collected, and stored to facilitate transportation of these materials to a recycler or hauler providing such services. The SRRP shall identify an adequate storage area for collection and removal of recyclable materials within the project and establish standards for collection/storage of recyclable, and green waste (if applicable), materials.
84. The proposed residential buildings shall be designed to be permanently equipped with clearly marked, durable, source sorted recyclables bins to facilitate the separation and deposit of recyclable materials.
85. Primary collection bins shall be designed to facilitate mechanized collection of recyclable wastes for transport to on- or off-site recycling facilities.
86. The Homeowners Association shall coordinate with the City of Los Angeles to continuously maintain in good order for the convenience of residents clearly marked, durable and separate bins in the same location to facilitate the commingled recyclables and deposit of recyclable or commingled waste metal, cardboard, paper, glass, and plastic; to maintain accessibility to such bins at all times; and to require waste haulers to utilize local or regional material recovery facilities as feasible and appropriate.
87. The Applicant shall comply with the provisions of City of Los Angeles Ordinance No. 171687 with regard to all new structures constructed as part of the proposed project.

Modified Project

Less Than Significant Impact. Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multi-family developments, private haulers provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Under the City's RENEW LA Plan, the City committed to reaching Zero Waste by diverting 70% of the solid waste generated in the City by 2013, diverting 90% by 2025, and becoming a zero waste city by 2030. State law currently requires at least 50% solid waste diversion and establishes a state-wide goal of 75% diversion by 2020. Moreover, state law

requires mandatory commercial recycling in all businesses and multifamily complexes and imposes additional reporting requirements on local agencies, including the City. In order to meet these requirements and goals, the City has established an exclusive, competitive franchise system for the collection, transportation and processing of commercial and multifamily solid waste that would aid the City in meeting its diversion goals by, among other things: (i) requiring franchisees to meet diversion targets; (ii) increasing the capacity for partnership between the City and solid waste haulers; (iii) allowing the City to establish consistent methods for diversion of recyclables and organics; (iv) increasing the City's ability to track diversion, which would enable required reporting and monitoring of state mandated commercial and multifamily recycling; (v) increasing the City's ability to ensure diversion quality in the processing facilities handling its waste and recyclables; and (vi) increasing the City's capacity to enforce compliance with federal, state, county, and local standards. Pursuant to Section 66.32 of the LAMC, the Project's solid waste contractor must obtain, in addition to all other required permits, an AB 939 Compliance Permit from the Bureau of Sanitation.

The Sunshine Canyon Landfill and the Chiquita Canyon Landfill serve land uses within the City. Both landfills accept residential, commercial, and construction waste. The Sunshine Canyon Landfill is jointly operated by the City and the County, has a remaining capacity of 64.69 million tons. Chiquita Canyon Landfill currently has a remaining capacity of 1.83 million tons. Thus, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill combined have a remaining permitted capacity of approximately 66.52 million tons. The Sunshine Canyon Landfill has an estimated remaining life of 23 years, and an expansion of the Chiquita Canyon Landfill is currently proposed, which would add a capacity of 48,114,000 tons (a 43-year life expectancy based on 2014 average daily disposal of 3,558 tons per day).⁶⁷

The Modified Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Under the requirements of the hauler's AB 939 Compliance Permit from the Bureau of Sanitation, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility. Debris from demolition of the asphalt surface parking lot would be recycled/recovered and would not be deposited in area landfills. Based on the development size of 251,398 square feet of residential floor area and 6,171 square feet of retail floor area, it is estimated that the construction of the Modified Project would generate approximately 562 tons of debris during the construction process (see Table III-40, below), of which 50% would be recycled to comply with state law. The 2007 IS/MND concluded that the Original Project would result in approximately 428 tons of construction debris, prior to recycling. As such, the Modified Project would produce a net increase of approximately 134 tons of construction waste as compared to the Original Project.

⁶⁷ *County of Los Angeles Department of Public Works, 2014 Annual Report, Los Angeles Countywide Integrated Waste Management Plan, pg. 60, December 2015.*

**Table III-40
Estimated Construction Debris**

Construction Activity	Size	Rate (lbs./sf)	Generated Waste (tons)
Construction			
Residential (305 dwelling units)	251,398 sf	4.38 ^b	551
Commercial ^c	6,171 sf	3.89 ^b	12
Total			562
<i>Notes:</i> sf = square feet; lbs = pounds ^a Assumed weight based on conversion of 500 cubic yards to tons. ^b USEPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, July 1998. ^c Includes restaurant uses. Source: Parker Environmental Consultants, 2015.			

As shown in Table III-41, Estimated Operational Solid Waste Generation, the Modified Project’s net generation during operation of the Modified Project would be 3,899 pounds per day. However, this estimate is conservative, as it does not factor in any recycling or waste diversion programs. This represents a net increase of approximately 3,187 pounds per day of solid waste as compared to the Original Project. The Modified Project’s solid waste would be handled by private waste collection services. Implementation of Mitigation Measures 81 through 87 and compliance with Regulatory Compliance Measure RC-SW-1, would further reduce the Modified Project’s impacts on solid waste generation. As the Modified Project includes apartments units, compared to condominium units as proposed by the Original Project, Mitigation Measures 83 and 86 have been updated so that the Applicant, rather than a Homeowners Association, shall be responsible for developing a Source Reduction and Recycling Plan and managing onsite-recycling bins and hauling. The amount of solid waste generated by the Modified Project is within the available capacities at area landfills and project impacts to regional landfill capacity would be less than significant. Implementation of Mitigation Measures 81 through 87 and compliance with Regulatory Compliance Measure RC-SW-1, would further reduce the Modified Project’s impacts on solid waste generation:

**Table III-41
Estimated Operational Solid Waste Generation**

Type of Use	Size	Solid Waste Generation Rate ^a (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Modified Project			
Multi-Family Residential	305 du	12.23 lbs/du/day	3,730
Commercial (6,171 sf) ^b	16 employees	10.53 lbs/employee/day	169
Total Project Solid Waste Generation			3,899
<i>Notes:</i> sf =square feet; du = dwelling units ^a L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill. ^b Includes restaurant uses. Employees were projected based on 1 employee per 383 square feet of retail and restaurant space. Source: Parker Environmental Consultants, 2016.			

Mitigation Measures:

81. The Applicant shall implement a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction.
82. In order to reduce the deposition of construction materials at solid waste landfills serving the City of Los Angeles, the grading contractor shall identify suitable private sites that accept all fill and earth materials for re-use. Sites in the City currently accepting construction/demolition debris include Browning Ferris Industries Recycling and Transfer Station and Mission Road Recycling and Transfer Station. Documentation of which site(s) is used shall be provided to the Bureau of Engineering, prior to the issuance of haul route permits.
83. A Source Reduction and Recycling Plan (SRRP) shall be developed by the ~~Homeowners Association~~ Applicant to the satisfaction of the Bureau of Engineering and Department of Sanitation. This plan shall identify methods to promote recycling and re-use of materials, as well as safe disposal consistent with the policies and programs contained in the City's Source Reduction and Recycling Element and the City's Solid Waste Management Policy Plan. The SRRP shall provide tenants and occupants with the means to recycle and compost materials in a manner that is practical and accessible. Specifically, the SRRP shall include a statement describing the methods by which the designated recyclables shall be separated from the waste stream, collected, and stored to facilitate transportation of these materials to a recycler or hauler providing such services. The SRRP shall identify an adequate storage area for collection and removal of recyclable materials within the project and establish standards for collection/storage of recyclable, and green waste (if applicable), materials.
84. The proposed residential buildings shall be designed to be permanently equipped with clearly marked, durable, source sorted recyclables bins to facilitate the separation and deposit of recyclable materials.
85. Primary collection bins shall be designed to facilitate mechanized collection of recyclable wastes for transport to on- or off-site recycling facilities.
86. The ~~Homeowners Association~~ Applicant shall coordinate with the City of Los Angeles to continuously maintain in good order for the convenience of residents clearly marked, durable and separate bins in the same location to facilitate the commingled recyclables and deposit of recyclable or commingled waste metal, cardboard, paper, glass, and plastic; to maintain accessibility to such bins at all times; and to require waste haulers to utilize local or regional material recovery facilities as feasible and appropriate.
87. The Applicant shall comply with the provisions of City of Los Angeles Ordinance No. 171687 with regard to all new structures constructed as part of the proposed project.

Regulatory Compliance Measures:

RC-SW-1 (Construction Waste Recycling) In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, which would total 70 percent by 2013, the Applicant shall salvage and recycle construction and demolition materials to ensure that a minimum of 70 percent of construction-related solid waste that can be recycled is diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished through the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 70 percent. In compliance with the LAMC, the General Contractor shall utilize solid waste haulers, contractors, and recyclers who have obtained an Assembly Bill (AB) 939 Compliance Permit from the City of Los Angeles Bureau of Sanitation.

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

Original Project

No Impact. The 2007 IS/MND concluded that the Original Project would operate in accordance with the City's Solid Waste Management Policy Plan and Framework Element of the General Plan, in addition to applicable Federal and State regulations associated with solid waste. Recycling collection facilities for residents would be included as part of the Original Project. Since the Original Project would comply with Federal, State, and local statutes and regulations related to solid waste, no significant impact would occur.

Modified Project

No Impact. Similar to the Original Project, the Modified Project would generate solid waste that is typical of a residential mixed-use building with ground-floor retail and would comply with all federal, state, and local statutes and regulations regarding proper disposal. Therefore, the Modified Project's solid waste and no significant impact would occur.

Cumulative Impacts

Less Than Significant Impact. Implementation of the Modified Project in conjunction with the 83 related projects would further increase regional demands on landfill capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing landfills serving the City of Los Angeles. Although there are several proposals for new landfills in the region, there are currently few viable options for City of Los Angeles waste past 2029. As shown in Table III-42, the Modified Project in combination with the related project would contribute approximately 85,760 tons of solid waste per year⁶⁸, which represents a fraction of one percent of the current remaining

⁶⁸ Calculation: 469,917 lbs. per day x 365 days / 2,000 = 85,760 tons per year

capacity of the Sunshine Canyon Landfill and the Chiquita Canyon Landfill, which combined have a remaining permitted capacity of approximately 68.72 million tons.

While in the short-term adequate landfill capacity exists to accommodate solid waste generated by the Modified Project, in the future there would be a need to develop additional landfills and other waste disposal options to accommodate future growth. These options include diversion or transformation as the preferred methods for addressing solid waste and specific and practical applications (i.e., market development, public education and public policy initiatives) within the City.

The City of Los Angeles Solid Waste Management Plan (AB 939) sets forth strategies that would provide adequate landfill capacity through 2037 to accommodate anticipated growth. The Bureau of Sanitation has projected the need for waste disposal capacity based on SCAG’s regional population growth projections. The growth associated with Modified Project is within those projections. Furthermore, projects within the City of Los Angeles must comply with the City’s SRRE.

**Table III-42
Projected Cumulative Solid Waste Generation**

Land Use	Size	Unit	Generation Rate (lbs/unit/day)	Total Solid Waste Generated (Pounds/Day)
Hotel	3,255	room	2lbs/room/day	6,510
Multiple-family residential ^a	26,882	du	12.23lbs/du/day	328,767
Retail/Commercial ^{a,b}	7,807	employee	10.53 lbs/employee/day	82,203
Medical Office	150,000	sf	0.007lbs/sf/day	1,050
Office	7,910,975	sf	0.006lbs/sf/day	47,466
Pre-School	3,200	sf	.007lbs/sf/day	22
Related Projects Total:				466,018
Modified Project Net Total:				33,899
Cumulative Total:				469,917
Modified Project Percent of Cumulative:				1%
<p><i>Notes:</i> du = dwelling units, sf = square feet Generation rates are based on City of Los Angeles Bureau of Sanitation, "Solid Waste Generation," 1981. Uses not listed are estimated by the closest type of use available. ^a Generation rates are based on L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill. ^b Employees were projected based on 1 employee per 383 square feet of retail/commercial space. Source: Parker Environmental Consultants, 2016.</p>				

As reported by the Bureau of Sanitation in 2009, the City had achieved a waste diversion rate of 65 percent. The City is exceeding the state-mandated diversion goal of 50 percent by 2000 set by the

California Integrated Waste Management Act (CIWMA) of 1989.⁶⁹ Waste diversion rates are required to increase to 75 percent by 2025 and through on-going development of waste management infrastructure over the last decade and innovative source reduction, reuse, recycling and composting programs have been implemented. These programs include Green Mulching and Composting workshops, black yard trimming recycling cans, the City-owned Central Los Angeles Refuse Transfer Station (CLARTS) and Residential Special Material and Electronics Recycling or S.A.F.E. Centers. New programs are being implemented to increase the amount of waste diverted by the City, including: multi-family recycling, food waste recycling, commercial recycling and technical assistance and support for City departments to help meet their waste reduction and recycling goals. The City is also developing programs to ultimately meet a goal of zero waste by 2030. Thus, the Modified Project's contribution to cumulative impacts would continue to decrease as it increases waste diversion rates in accordance with City goals. Therefore, the Project's contribution to cumulative solid waste impacts would be less than cumulatively considerable, and cumulative impacts with respect to solid waste would be less than significant.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

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

A significant impact may occur only if the Modified Project would have an identified potentially significant impact for any of the above issues.

Original Project

Less Than Significant. The analyses of the 2007 IS/MND conclude that no significant unmitigated impacts to the environment would occur. Based on these findings, the Original Project is not expected to degrade the quality of the environment. The existing Project Site is a surface parking lot, which contains no landscaping and does not support sensitive species. Because the existing site is developed with impervious surfaces and characterized by high levels of human activity, the Original Project would not have the potential to 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. Furthermore, potential impacts to adjacent historical resources would be reduced to a less than of significant level after mitigation. Therefore, impacts in relation to degradation of natural habitat and California history would be less than significant.

⁶⁹ *City of Los Angeles Department of Public Works Bureau of Sanitation, Overview of Services for FY 2005/06, updated June, 14 2005.*

Modified Project

Less Than Significant. The Modified Project is located in a densely populated urban area and would have no unmitigated significant impacts with respect to biological resources and less-than-significant cultural resource impacts provided the mitigation measures listed above are implemented. The Modified Project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, similar to the Original Project, a less than significant impact would occur.

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

A significant impact may occur if the Modified Project, in conjunction with other 84 related projects in the area of the Project Site, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together.

Original Project

Less Than Significant Impact. As concluded in the 2007 IS/MND, the Original Project's contribution to cumulative impacts related to aesthetics, agricultural resources, air quality, biological resources, cultural resources, geology/seismic hazards, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, and utilities would be less than significant. There may be environmental impacts which are individually limited but significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. However, these cumulative impacts would be mitigated to a level of insignificance by imposing the mitigation measures identified in the 2007 IS/MND.

Modified Project

Less Than Significant Impact. As concluded in this analysis, the Modified Project's incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, and utilities would be less than significant. As such, similar to the Original Project, the Modified Project's contribution to cumulative impacts would be less than significant.

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

Original Project

No Impact. Based on the 2007 IS/MND analyses, implementation of the Original Project would have no substantial direct or indirect environmental effects that would cause adverse effects on human beings.

Modified Project

Less Than Significant Impact. Based on the preceding environmental analysis, the Modified Project would not have significant environmental effects on human beings, either directly or indirectly. Similar to the Original Project, any potentially significant impacts would be reduced to less-than-significant levels through the implementation of the applicable mitigation measures associated with cultural resources, soils/geology, land use compatibility, noise and vibration (for a complete list of applicable mitigation measures, see Summary of Mitigation Measures in the Initial Study Checklist Form of this Addendum).

APPENDIX F: ENERGY CONSERVATION

Appendix F: Energy Conservation of the State CEQA Guidelines states the goal of conserving energy implies the wise and efficient use of energy. The State CEQA Guidelines outlines three means to achieve this goal:

1. Decreasing overall per capita energy consumption,
2. Decreasing reliance on fossil fuels such as coal, natural gas and oil, and
3. Increasing reliance on renewable energy sources.

The 2007 IS/MND for the Original Project did not analyze energy efficiency. However, similar to the Original Project, the Modified Project proposes to develop a mixed-use development on an infill site, which would contribute to the revitalization of the Central City Community Plan area. Similar to the Original Project, as a mixed-use project, with both residential and commercial land uses, the Modified Project is required to comply with the energy conservation standards established in Title 24 of the California Administrative Code. California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The California Energy Commission adopted 2013 Standards on May 31, 2012, and the California Building Standards Commission approved them on January 23, 2013. The 2013 Standards will continue to improve upon the 2008 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The 2013 Standards became effective on July 1, 2014, and were a specific response to the mandates of AB 32 and to pursue California energy policy that energy efficiency is the resource of first choice for meeting California's energy needs. The Modified Project includes energy efficiency components to conserve energy, which are detailed below.

Energy Consumption

As discussed above, similar to the Original Project, the Modified Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The

Modified Project would also be required to comply with the *L.A. Green Building Code*. The *L.A. Green Building Code*, effective January 1, 2014, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The *L.A. Green Building Code* contains both mandatory and voluntary green building measures to conserve energy. Among many requirements, the *L.A. Green Building Code* requires projects to achieve a 20 percent reduction in wastewater generation. Therefore, compliance with Title 24 of the California Administrative Code and the *L.A. Green Building Code* would reduce the Modified Project's energy consumption.

The Modified Project will also comply with the City of Los Angeles Low Impact Development Ordinance (City Ordinance No. 181899) and implement Best Management Practices that have stormwater recharge or reuse benefits for the entire Modified Project, as applicable. The City of Los Angeles Low Impact Development (LID) Ordinance was adopted in November 2011 and became effective in May 2012. The main purpose of the LID Ordinance is to comply with the requirements of the SUSMP, integrate LID practices and standards for stormwater pollution mitigation, and maximize open, green and pervious space on all developments and redevelopments consistent with the City's landscape ordinance and other related requirements in the Development Best Management Practices Handbook. Compliance with the LID Ordinance would ensure reduction of the Modified Project's overall per capita energy consumption.

Lastly, the Modified Project would be expected to include energy conservation features. Specifically, the residential units would include low-flow water features and energy conservation appliances. Thus, the Modified Project's 305 residential units would incorporate energy conservation features.

Fossil Fuels

Similar to the Original Project, the Modified Project would include several conservation measures to decrease reliance on fossil fuels, including coal, natural gas and oil. The Project Site for the Original Project was located in a transit-oriented district. The Modified Project is located on the same Project Site as the Original Project and, therefore, would also be located in a transit-oriented district. The Project Site is located in downtown Los Angeles, which is at the hub of the regional transit network in the Los Angeles area. The project area is currently served by a total of four local and inter-city transit operators. Located immediately west of the Project Site, Hill Street carries two Metro Rapid lines (728, 794) and eight Metro Local Bus lines (2, 4, 28, 81, 83, 90, 91, 94), one Montebello line (M 50) and one Commuter Express line (CE 419) in a north-south direction. Located immediately south of the Project Site, 9th Street carries three Metro Local Bus lines (10, 66, 81), and one Commuter Express line (CE 419) in an east direction. Located east of the Project Site, Broadway carries one Metro Rapid line (745) and eight Metro Local Bus lines (2, 4, 30, 35, 38, 40, 45, 330) in a north-south direction. Located west of the Project Site, Olive Street carries one Metro Rapid line (770) and eight Metro Local Bus lines (14, 70, 71, 76, 78, 79, 96, 378), one Foothill Transit line (FT SS), one Santa Monica Big Blue Bus line (BBB R10) and two Commuter Express lines (CE 431, 437) in a north direction.

Additionally, the Project Site is approximately 0.5 mile (walking distance) southeast of the 7th Street/Metro Center Station, which provides subway and light rail services, and 0.5 mile (walking distance) south from the Pershing Square Station, which provides subway services. Subway lines from the 7th Street/Metro Center and Pershing Square Station include the Metro Purple Line and the Metro Red

Line. Light rail services from the 7th Street/Metro Center Station include the Metro Blue Line and the Metro Expo Line. Both Metro stations are easily accessed by many bus lines. The Metro Purple Line provides service between Los Angeles (Wilshire/Western) and Downtown Los Angeles (Union Station). The Metro Red Line provides service between North Hollywood and Downtown Los Angeles (Union Station). The Metro Blue Line provides service between Downtown Los Angeles and Long Beach. The Metro Expo Line provides service between Downtown Los Angeles and Culver City. Due to its proximity to the 7th Street/Metro Center and Pershing Square Station, the Project Site is easily accessible and highly connected with the City of Los Angeles, the greater Los Angeles area, and Orange County. Therefore, the Project Site's proximity to local public transportation would decrease the Modified Project's reliance on fossil fuels, similar to the Original Project.

Additionally, as an infill development, like the Original Project, the Modified Project will incorporate a mix of retail and residential uses. Because of the Project Site's location near transit service, a number of trips would be expected to be transit or walk trips rather than vehicle trips. Some residents and/or visitors would take transit to their destinations, or would walk to destinations nearby. As discussed in the Traffic Study (see Appendix F of this Addendum), because the commercial component of the Modified Project would be primarily serving to the proposed development and surrounding project area, some of the trips might be expected to be walk-ins either from the Modified Project or the surrounding area. Certain adjustments to the trip generation were therefore made, with LADOT approval, to reflect these conditions. For the trips generated by the residential uses, a reduction of 15% for use of transit and walk-ins from the surrounding area was applied. For the trips generated by the retail uses, a reduction of 10% for internal trips from the Modified Project, 15% for use of transit and walk-ins from the surrounding area, and a pass-by rate of 50% were applied. For the trips generated by the restaurant uses, a reduction of 10% for internal trips from the Modified Project, 15% for use of transit and walk-ins from the surrounding area, and a pass-by rate of 10% were applied. The reduction in vehicle trips, due to the Modified Project's mixed-use programming and the Project Site's location in a transit-oriented district, would therefore decrease the Modified Project's reliance on fossil fuels.

Renewable Energy

With respect to renewable energy, the Modified Project includes the following features:

- *Proximity to mass transit:* The Project Site is an infill site within a transit priority area as defined by CEQA. It is located within ½ mile of two existing rail transit stations, the 7th Street Metro rail transit station, and the Pershing Square Metro rail transit station. The Project Site is also located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less.
- *In-Fill Smart Growth:* The Modified Project is located on an existing infill site that is currently developed with surface parking that is located in a highly developed area of downtown Los Angeles. The Project Site is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.
- *Trip Reduction:* In addition to its location in a transit priority area, the Modified Project would

also provide on-site bicycle parking in bicycle storage spaces pursuant to the City of Los Angeles Bicycle Ordinance (Ord. 182386). Pursuant to LAMC Section 12.21 A.16, the Modified Project is required to supply 34 short-term bicycle parking spaces and 308 long-term bicycle parking spaces, for a total of 342 bicycle parking spaces. The Modified Project proposes to provide 343 spaces, unlike the Original Project, which did not provide any bicycle parking.

- *Resource Conservation:* As mandated by the *L.A. Green Building Code*, the Project would be required to exceed Title 24 2013 standards and include ENERGY STAR appliances. (See PDF-GHG-1). The Modified Project would incorporate energy conservation features in the proposed residential units such as low-flow water fixtures and energy conservation appliances.

With incorporation of the features identified above, the Modified Project would not involve new significant environmental effects, or a substantial increase in the severity of significant effects as compared to the Original Project, with respect to renewable energy.

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2. ACRONYMS AND ABBREVIATIONS

AAM	Annual Arithmetic Mean
AB	Assembly Bill
ACM	Asbestos-containing materials
AEP	Association of Environmental Professionals
AFY	Acre-feet per year
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
ASTM	American Society of Testing and Materials
ASTs	above-ground storage tanks
ATCS	Adaptive Traffic Control System
Basin	South Coast Air Basin
BMPs	Best Management Practices
C/D	construction/demolition
CAA	Clean Air Act
CAAQS	California ambient air quality standards
Cal/EPA	California Environmental Protection Agency
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code (2007)
CCAA	California Clean Air Act
CCAR	California Climate Action Registry
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CDMG	California Division of Mines and Geology
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
Cf	Cubic feet
CFC	Chlorofluorocarbons
CGS	California Geological Survey
CH ₄	Methane
CHMIRS	California Hazardous Material Incident Report System
CiSWMPP	City of Los Angeles Solid Waste Management Policy Plan
City Zoning Code	City of Los Angeles Planning and Zoning Code
CMP	Congestion Management Plan
CNEL	Community Noise Exposure Level
CO	carbon monoxide
CO ₂	carbon dioxide

CO ₂ e	carbon dioxide equivalent
COHb	carboxyhemoglobin
COPC	Chemical of Potential Concern
CORRACTS	Corrective Action Treatment, Storage, and Disposal Facilities
CPA	Community Plan Area
CPT	cone penetrometer test
CPU	Crime Prevention Unit
CRA/LA	Community Redevelopment Agency of the City of Los Angeles
CWA	Clean Water Act
CWC	California Water Code
cy	cubic yards
dB	decibel
dBA	A-weighted decibel scale
d/D	flow level
DHS	California Department of Health and Services
DWP	Department of Water and Power
DWR	California Department of Water Resources
du	dwelling unit
EIR	Environmental Impact Report
EMS	Emergency Medical Service
EOO	Emergency Operations Organization
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
EZ	Los Angeles State Enterprise Zone
FAR	Floor Area Ratio
FCAA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
GBCI	Green Building Certification Institute
GHG	greenhouse gas
gpd	gallons per day
gpm	gallons per minute
GWP	Global Warming Potential
HFC	hydrofluorocarbons
HSA	Hyperion Service Area
HTP	Hyperion Treatment Plant
HVAC	Heating, Ventilation and Air Conditioning
I-10	Santa Monica Freeway
I-101	Hollywood Freeway
ISO	Interim Control Ordinance
ITE	Institute of Transportation Engineers
km	kilometers

kV	kilovolt
kWh	kilowatt-hours
LAA	Los Angeles Aqueduct
LABS	Los Angeles Department of Public Works Bureau of Sanitation
LADBS	Los Angeles Department of Building and Safety
LADOT	Los Angeles Department of Transportation
LADRP	Los Angeles Department of Recreation and Parks
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LAPL	Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LBP	Lead-based paint
lbs/day	pounds per day
LCFS	Low Carbon Fuel Standard
L _{dn}	day-night average noise level
LEED	Leadership in Energy and Environmental Design
L _{eq}	equivalent energy noise level/ambient noise level
LOS	Level of Service
LST	localized significance thresholds
LUST	leaking underground storage tank
LUTP	Land Use/Transportation Policy
MBTA	Migratory Bird Treaty Act
MCE	Maximum Considered Earthquake
MEP	maximum extent practicable
Metro	Los Angeles County Metropolitan Transit Authority
mgd	million gallons per day
mi	miles
MPO	Metropolitan Planning Organization
MS4	medium and large municipal separate storm sewer systems
msl	mean sea level
mm	millimeters
M _{max}	maximum moment magnitude
MTA	Metropolitan Transportation Authority
MWD	Metropolitan Water District
MWh	Mega-Watt hours
N ₂ O	nitrous oxide
NAAQS	National ambient air quality standards
NFRAP	No Further Remedial Action Planned Sites
NO ₂	nitrogen dioxide

NOP	Notice of Preparation
NO _x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
O ₃	Ozone
OAL	California Office of Administrative Law
OPR	Office of Planning and Research
Pb	lead
PEC	Potential environmental concern
PFC	perfluorocarbons
PGA	peak horizontal ground acceleration
PM	particulate matter
PM ₁₀	respirable particulate matter
PM _{2.5}	fine particulate matter
ppd	pounds per day
ppm	parts per million
PRC	Public Resources Code
PSI	pounds per square inch
PUC	Public Utilities Commission (also see CPUC)
PWS	Public water suppliers
RCP	Regional Comprehensive Plan
RCPG	Regional Comprehensive Plan and Guide
RCRA	Resource Conservation Recovery Act
RD	Reporting District
REC	Recognized Environmental Condition
ROG	Reactive Organic Gases
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCG	Southern California Gas Company
SCH	State Clearinghouse
sf	square feet
SF ₆	sulfur hexafluoride
SIP	State Implementation Plan
SLIC	Spills, Leaks, Investigation and Cleanup
SO ₂	sulfur dioxide
SO ₄	sulfates
SO _x	sulfur oxides
SOPA	Society of Professional Archeologist

SPT	Standard Penetration Test
SR-110	Harbor Freeway
SRA	source receptor area
SRRE	Source Reduction and Recycling Element
SWAT	Solid Waste Assessment Test
SWF/LF	Solid Waste Information System
SWFP	Solid Waste Facility Permit
SWMP	stormwater management plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	Toxic Air Contaminants
TOD	Transit Oriented District
TPH	total petroleum hydrocarbons
TSD	Treatment, Storage, and Disposal
TSP	Transportation Specific Plan
ULSD	Ultra Low Sulfur Diesel
US-101	Hollywood Freeway
USEPA/ U.S. EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGBC	United States Green Building Council
USGS	U.S. Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
V/C	Volume-to-Capacity
VCP	Voluntary Cleanup Plan
VdB	Vibration decibels
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
WMA	Watershed Management Area
WMUDS	Waste Management Unit Database System
WSA	Water Supply Assessment
µg/m ³	micrograms per cubic meter
ZIMAS	Zoning Information and Map Access System