

## The Grand Avenue Project

Fourth Addendum to the Grand Avenue Project Environmental Impact Report  
Environmental Case: ENV-2020-1935-EIR-ADD  
State Clearinghouse No.: 2005091041

**Project Location:** 100 South Grand Avenue and 111, 121, 141, 145, 151, and 161 South Olive Street  
Los Angeles, CA 90012

**Community Plan Area:** Central City

**Council District:** 14—Huizar

**Project Description:** This document serves as the Fourth Addendum to the Grand Avenue Project Final EIR (SCH No. 2005091041), certified by the Los Angeles Grand Avenue Authority on November 20, 2006 (the “Final EIR”), for The Grand Avenue Project. The Grand Avenue Project includes: 1) creation of Grand Park (formerly Civic Park), 2) streetscape improvements along Grand Avenue, and 3) the development of five parcels. This Addendum analyzes the potential impacts of the establishment of a Sign District for a comprehensive signage program in conjunction with the mixed-use development on Parcel Q, a 3.22-acre portion of The Grand Avenue Project. The signage program would include wall signs, projecting signs, monument signs, kiosk signs, window signs, digital displays, supergraphic signs, on- and off-site advertising, and other standard sign types.

**PREPARED FOR:**

The City of Los Angeles  
Department of City Planning

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**APPLICANT:**

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# 1. INTRODUCTION

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This document is an Addendum to the Environmental Impact Report (EIR) prepared for the Grand Avenue Project (State Clearinghouse No. 2005091041), which was certified by the Los Angeles Grand Avenue Authority (Authority) in November of 2006 (Certified EIR).<sup>1</sup> In accordance with the California Environmental Quality Act (CEQA), this Addendum to the EIR analyzes proposed modifications (the Modified Project) to the Grand Avenue Project approved in November 2006 (the Approved Project), and demonstrates that all of the potential environmental impacts associated with the proposed modifications would be within the envelope of impacts already evaluated in the Certified EIR.

## 1.1 BACKGROUND

The Authority prepared an EIR pursuant to CEQA for the Grand Avenue Project to assess potential environmental impacts of the Project. The EIR concluded that the Project would result in significant and unavoidable impacts even after implementation of all feasible mitigation measures for the following environmental impact categories: cumulative impacts to shade and shadow; views; construction and operational impacts related to air quality; historic resources; land use and zoning; construction impacts related to noise; public services including cumulative impacts to police and library services and construction related impacts to recreation uses; and traffic impacts. The remainder of the Project's environmental impacts would be less than significant with mitigation.

In November of 2006, the Authority certified the EIR and the City approved the Project. Subsequent to approval of the Project, three addenda were prepared. In 2010, an addendum (First Addendum) was prepared and approved that addressed two proposed changes to the Certified EIR consisting of: (1) changes to development of Parcels L and M-2 to reflect a different mix of land uses and a different site configuration; and (2) changes to the original schedule for implementation of the overall development. Specifically, the Approved Project included a Disposition and Development Agreement (DDA) and a Ground Lease, which set forth a schedule for implementing the various phases and components of the Approved Project. Intervening events necessitated the modification and extension of this schedule to allow for extended time frames to complete all phases and project components.

In 2013, a second addendum (Second Addendum) was prepared and approved to address changes in the location of approved towers on Parcel Q and the overall net square-footage of proposed retail and restaurant uses. Particularly, the Second Addendum addressed revisions to the overall height envelope, tower locations, minor changes to driveways, a reduction in the overall

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<sup>1</sup> *The Los Angeles Grand Avenue Authority (Authority) was established through a Joint Exercise of the Powers Agreement between the Community Redevelopment Agency of the City of Los Angeles and the County of Los Angeles.*

amount of retail, restaurant, and health facility uses from 284,000 square feet to 220,000 square feet, and the addition of 50,000 square feet of office space.

In 2018, a third addendum (Third Addendum) was prepared and approved to assess impacts related to the proposed non-protected street tree removals and replacements, and to assess potential impacts related to air quality, greenhouse gas emissions, and noise, associated with a haul route application for the development of Parcel Q. The Addenda, collectively with the Certified EIR, concluded that the proposed changes would not cause any new significant impacts or substantial increase in the severity of the previously-identified impacts in the Certified EIR. The Project analyzed in the Certified EIR as modified by these Addenda currently represent the Approved Project.

While the Certified EIR generally analyzed the impacts of future signage on the Project Site, specific details for a Sign District or signage program were not available at the time of the preparation of the EIR. Therefore, this Addendum will analyze and disclose any potential impacts that could occur from implementation of a Sign District for Parcel Q, a portion of the Project Site (Modified Project). Both the Approved Project (as analyzed in the Certified EIR) and the Modified Project (analyzed in this Addendum) are discussed further below.

## **1.2 CEQA AUTHORITY FOR AN ADDENDUM**

CEQA establishes the type of environmental documentation required when changes to a project occur after an EIR is certified. Specifically, Section 15164(a) of the CEQA Guidelines states that:

*The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*

CEQA Guidelines Section 15162 requires the preparation of a Subsequent EIR when an EIR has been certified or a negative declaration has been adopted for a project and one or more of the following circumstances exist:

- (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.

Likewise, California Public Resources Code (PRC) Section 21166 states that unless one or more of the following events occur, no Supplemental or Subsequent EIR shall be required by the lead agency or by any responsible agency:

- (a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report;
- (b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report; or
- (c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

As demonstrated by the analysis in this document, the Modified Project would not result in any of the following:

- (1) Substantial changes that will require major revisions of the previous EIR, as the modifications are related strictly to a Sign Program;
- (2) Substantial changes with respect to the circumstances under which the Modified Project is undertaken since the Sign Program has not altered or created special circumstances;
- (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, since implementation of a new and expanded Sign Program that relates directly to the current market is not new information of substantial importance and was not known at the time. Additionally, the following will not occur:

- (a) The project will have one or more significant effects not discussed in the previous EIR;
- (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.

Therefore, the modifications resulting from the Modified Project do not meet the criteria for a Supplemental or Subsequent EIR pursuant to CEQA Guidelines Section 15162.

## 2. PROJECT DESCRIPTION

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### 2.1 PROJECT SUMMARY

#### 2.1.1 Overview of Approved Project

The Approved Project, as analyzed in the Certified EIR and three subsequent Addenda, includes the following components: (1) The now completed 16-acre County owned Grand Park (formerly Civic Park) that expands the existing Civic Center Mall that connects Los Angeles' City Hall to Grand Avenue; (2) Streetscape improvements along Grand Avenue between Fifth Street and Cesar E. Chavez Avenue. Grand Avenue Improvements between 2nd Street and 3rd Street will be completed with development of Parcels L and M-2, which are currently under construction; and (3) Development of five parcels, which are referred to as Parcels Q, W-1, W-2, L, and M-2. Two development options were also analyzed in the Certified EIR: (1) The Project with County Office Building Option (on Parcel W-2); and (2) The Project with Additional Residential Development Option (on Parcel W-2). In 2010, an addendum (First Addendum) was prepared and approved that addressed two proposed changes to the Certified EIR consisting of: (1) changes to development of Parcels L and M-2 to reflect a different mix of land uses and a different site configuration; and (2) changes to the original schedule for implementation of the overall development.

Specifically, the Approved Project included a Disposition and Development Agreement (DDA) and a Ground Lease that set forth a schedule for implementing the various phases and components of the Approved Project. Intervening events necessitated the modification and extension of this schedule to allow for extended time frames to complete all phases and project components. In 2013, a second addendum (Second Addendum) was prepared and approved to address changes in the location of approved towers on Parcel Q and the overall net square-footage of proposed retail and restaurant uses. Particularly, the Second Addendum addressed revisions to the overall height envelope, tower locations, minor changes to driveways, a reduction in the overall amount of retail, restaurant, and health facility uses from 284,000 square feet to 220,000 square feet, and the addition of 50,000 square feet of office space. In 2018, a third addendum (Third Addendum) was prepared and approved to assess impacts related to the proposed non-protected street tree removals and replacements, and to assess potential impacts related to air quality, greenhouse gas emissions, and noise, associated with a haul route application needed for development of Parcel Q.

Under the Project with County Office Building Option, up to 2,060 residential units, including up to 412 affordable units; up to 449,000 square feet of retail floor area; up to 275 hotel rooms; and a County Office Building containing up to 681,000 square feet, would be constructed. Under the Project with Additional Residential Development Option, up to 2,660 residential units, including 532 affordable units; 449,000 square feet of retail floor area; and up to 275 hotel rooms would be constructed. The County Office Building would not be constructed under the Project with Additional Residential Development Option. The total floor area to be developed under both options is 3.6 million square feet.

On March 1, 2018, the City issued a Revised Tract Map No, 67490 in which the development program was revised to include up to 315 hotel rooms, utilizing the Equivalency Program for the project. A supplemental memorandum from Mobility Group concluded that the development for Parcel Q had decreased overall in size compared to the original program as analyzed in the 2006 EIR and is thereby within the scope of environmental impacts previously analyzed in the Certified EIR.

Specifically, for the development of Parcel Q, the Approved Project consists of the following uses within two towers: (1) 500 residential units, (2) a hotel with 315 guest rooms and 15,000 square feet of meeting space, and (3) 284,000 square feet of retail uses.

The Approved Project's signage program for the entire Grand Avenue Project would consist of building and identification signs. Identification signs may be located at the primary entrances to pedestrian and vehicular access points. Parcel Q building signs would be located on building facades along Grand Avenue, First Street, Olive Street, and Hill Street. Residential and commercial signage would be illuminated for security, according to Fire Department requirements. Signage for the hotel/residential tower on Parcel Q would be illuminated to establish the buildings' presence in the context of downtown Los Angeles and at the street level for retail businesses and restaurants along Grand Avenue. Signage illumination lighting would not exceed the City's established standards for these residential buildings (three foot-candles above ambient lighting at the property line). The Certified EIR for the Approved Project also acknowledged that a signage district may be sought for the Project area. However, details associated with the approval of a signage district were not known at the time the EIR was certified.

### **2.1.2 Modifications to Approved Project**

Since the certification of the EIR and approval of the Project, the Project Applicant has applied for a Sign District for the Parcel Q portion of the Grand Avenue Project and has submitted a comprehensive signage program for the Parcel Q site. The Sign Program would include wall signs, projecting signs, monument signs, kiosk signs, window signs, digital displays, supergraphic signs, on- and off-site advertising, and other standard sign types.

This Sign Program includes two wall-mounted digital displays on Olive Street and 1<sup>st</sup> Street and five supergraphic signs along Olive Street. Non-digital signage would be illuminated with electric lamps (such as neon or cathode ray tubes, fiber optic, light-emitting diode (LED) or incandescent lamps), shielded spotlights and wall wash fixtures. Apart from the digital displays and supergraphics, each signage type proposed as part of the Sign Program would largely conform to LAMC sign regulations and ordinances set forth in LAMC Chapter I, Article 4.4.

The Sign District will further enhance the compatibility of the Sign Program with the Project's architecture by creating regulations that address the unique nature of the Project Site. The Sign District will include regulations with respect to the location, number, duration, square footage, height, light illumination, design and types, hours of illumination of signs; a sign reduction program; as well



as other characteristics, such as inclusion of murals, supergraphics, and other on-site and off-site signs.

The proposed Sign District and Sign Program for the Parcel Q portion of the Approved Project., which includes signage distributed across the Parcel Q Site along the following frontages:

- Grand Avenue Signage
- 1<sup>st</sup> Street Signage
- Olive Street Signage
- 2<sup>nd</sup> Street Signage
- Urban Room-South Signage
- Urban Room-North Signage

Implementation of the Sign Program would not change any of the land uses and development parameters with respect to any other aspect of the Approved Project, including Grand Park, Grand Avenue Streetscape Program, and development of the five parcels. All applicable mitigation measures, regulatory measures, and project design features proposed under the Approved Project would remain. No other changes are proposed as part of the Modified Project.

## **2.2 ENVIRONMENTAL SETTING**

### **2.2.1 Project Location**

The Project Site is located in the Central City Community Plan area in the downtown center of the City of Los Angeles. The Parcel Q Site is bounded by Grand Avenue on the north, First Street on the east, Second Street on the west, and Olive Street to the south. Arterials providing regional access to the Project Site include 1<sup>st</sup> Street and Grand Avenue. In addition, access to the Los Angeles County Metropolitan Transportation Authority (Metro) Civic Center/Grand Park Station is located one block (approximately 1,000 feet) from the Project Site with station portals at the northeastern corner of 1<sup>st</sup> Street and Hill Street. The Civic Center/Grand Park Station is served by the Metro Red and Purple line along with the Silver Line limited-stop bus route. Additionally, Metro, LADOT, and other transit agencies, including the Foothill Transit, and Antelope Valley Transit Authority, operate numerous bus lines with stops located in proximity to the Project Site. Parcel Q encompasses a full city block and is bounded by Olive Street to the east, First Street to the north, Grand Avenue to the west, and Second street to the south. Please see Figure 1, Certified EIR Aerial Photograph, below.



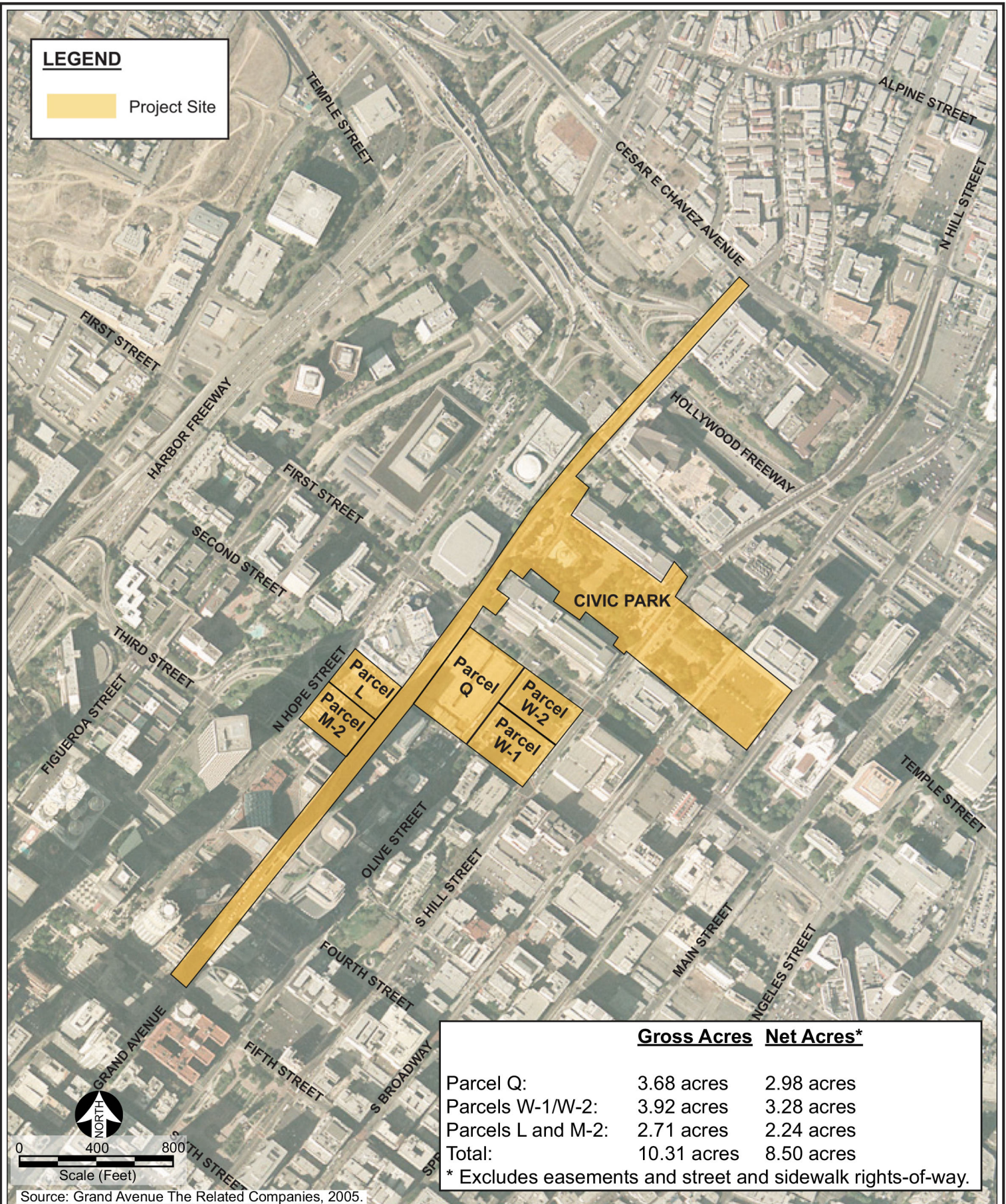


Figure 1  
Certified EIR Aerial Photograph



### **2.2.2 Existing Conditions**

Construction has commenced on the Parcel Q site. The previously existing three story 1,062 space parking structure has been demolished. The Parcel Q site is bounded on four sides by construction fencing and concrete barriers with the structural concrete and framing nearing completion.

### **2.2.3 Surrounding Land Uses**

The Project Site is located in a highly urbanized area comprised mostly of commercial development, as well as cultural and institutional uses. Surrounding and nearby land uses include high-rise office buildings to the south; cultural uses, such as the Walt Disney Concert Hall, the Los Angeles Music Center, the Cathedral of Our Lady of the Angels, the Museum of Contemporary Art (MOCA) and Colburn School of Performing Arts along Grand Avenue; and government buildings, such as the Los Angeles City Hall, the County's Kenneth Hahn Hall of Administration and the Hall of Records as well as the Los Angeles County/Stanley Mosk Courthouse north of First Street.

Surrounding residential land uses include the Grand Promenade Tower; Bunker Hill Towers and Promenade Plaza, and Angelus Plaza and Museum Tower to the south of the Site. The residential uses in this area are generally high-rise, ranging from 17 stories (Angelus Plaza) to 32 stories (Bunker Hill Tower). Low-rise residential uses are located to the north of Cesar E. Chavez Avenue.

## **2.3 REQUESTED PERMITS AND APPROVALS**

The discretionary entitlements, reviews, permits and approvals for the signage program for the Modified Project include the following:

Pursuant to LAMC Sections 12.32 and 13.11, a Signage Supplemental Use District ("Sign District") for Parcel Q to establish regulations for a comprehensive signage program.

## **2.4 RESPONSIBLE PUBLIC AGENCIES**

A Responsible Agency under CEQA is a public agency with discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). The discussion below identifies whether any responsible agencies have been identified for the Project.

The Los Angeles Grand Avenue Authority ("Authority"), which is an independent public agency established through a Joint Exercise of Powers Agreement (The JPA Agreement) between the former Community Redevelopment Agency of the City of Los Angeles and the County of Los Angeles (County). CRA/LA is the successor agency of the Community Redevelopment Agency of the City of Los Angeles, and currently oversees the former agency's commitments.

### 3. ENVIRONMENTAL IMPACT ANALYSIS

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This section provides an impact assessment of the Modified Project. As set forth above, the Certified EIR for the Approved Project generally analyzed impacts associated with signage for the Approved Project. The Modified Project provides for clarification of the Sign District and a more detailed Sign Program for the Parcel Q site of the Approved Project. No other changes are proposed as part of the Modified Project. Specifically, the land use mix, square footage, height, massing, development area, and construction assumptions set forth in the Certified EIR and subsequent Addenda would not change.

This Addendum analyzes the potential environmental effects of the proposed changes as compared to the environmental effects of the Approved Project as set forth in the Certified EIR. As discussed in the sections that follow, the analysis demonstrates that the Sign Program would not involve substantial changes that would result in new significant environmental effects or a substantial increase in the severity of significant effects previously identified in the Certified EIR prepared for the Project. There have been no substantial changes with respect to the circumstances under which the Approved Project would be undertaken that would result in new significant environmental effects and no substantial increase in the severity of significant effects previously identified in the Certified EIR. Finally, the analysis demonstrates that there is no new information of substantial importance meeting the criteria of Guidelines Section 15162(a)(3), as discussed in greater detail below.

As determined by the Authority in the Certified EIR, Agricultural Resources, Biological Resources, Geology and Soils, Hydrology and Water Quality, and Mineral Resources were all scoped out of further environmental review and were not discussed nor analyzed in the Certified EIR. The information below therefore addresses environmental issue areas that were previously analyzed within the scope of the previously Certified EIR and Subsequent Addenda for the Approved Project and the recently revised Appendix G of the CEQA Guidelines that could be potentially affected by the Sign Program. Therefore, the checklist and evaluation below provide the following information focusing on changes from the Approved Project to the Modified Project for the environmental topics related to aesthetics, land use/planning, and transportation. Environmental topics that were discussed in the Certified EIR and not discussed further in this Addendum, due to no potential impact from the Sign Program, include the following: Historical Resources, Population and Housing, Air Quality, Noise, Hazards and Hazardous Materials, Public Services, and Utilities.

The conclusions of the previously certified EIR are provided as a reference for each environmental issue area below for purpose of describing how the proposed changes would not result in any new significant impacts and would not increase the severity of the significant impacts identified in the EIR. A Modified Environmental Checklist Form (Form) was used to compare the anticipated environmental effects of the Modified Project with those disclosed in the EIR and to review whether any of the conditions set forth in Public Resources Code, Section 21166 or CEQA Guidelines, Section 15162, requiring preparation of a subsequent or supplemental EIR, have been

triggered. The Form provides the following information as to each of the impact thresholds analyzed in each of the impact categories.

## 1 Impact Determination in the Certified EIR

This section lists the impact determination made in the Certified EIR for the applicable impact category.

## 2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Pursuant to CEQA Guidelines Section 15162(a)(1), this section indicates whether the Modified Project would result in new significant impacts that have not already been considered and mitigated by the prior environmental review or would result in a substantial increase in the severity of a previously identified impact.

## 3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Pursuant to CEQA Guidelines Section 15162(a)(2), this section indicates whether there have been changes to the Project Site or the vicinity (circumstances under which the project is undertaken) that have occurred subsequent to the prior environmental documents, which would result in the Modified Project having new significant environmental impacts that were not considered in the prior environmental documents or that substantially increase the severity of a previously identified impact.

## 4 Any New Information Requiring New Analysis or Verification?

Pursuant to CEQA Guidelines Section 15162(a)(3)(A-D), this section indicates whether 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 environmental documents were certified as complete is available, requiring an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigations remain valid. If the new information shows that:

- (A) The project will have one or more significant effects not discussed in the prior environmental documents;
- (B) Significant effects previously examined will be substantially more severe than shown in the prior environmental documents;
- (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 prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative;

then the question would be answered “Yes”, requiring the preparation of a Supplemental or Subsequent EIR. However, if the additional analysis completed as part of this environmental review finds that the conclusions of the prior environmental documents remain unchanged and no new significant impacts are identified, or identified environmental impacts are not found to be more severe, or there are no additional mitigation measures or alternatives now available or feasible but declined for adoption by the project proponent, then the question would be answered “No” and no Supplemental or Subsequent EIR is required.

## 5 Mitigation Measures Addressing Impacts

Pursuant to CEQA Guidelines Section 15162(a)(3), this section indicates whether the prior environmental document provides mitigation measures to address effects in the related impact category. A “Yes” response will be provided in either instance. If a “No” response is indicated, a significant impact was not identified, and mitigation was not required.

## 6 Conclusion

For each environmental topic, a discussion of the conclusion relating to the analysis is provided.

### 3.1 AESTHETICS

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's PDFs and/or Mitigation Measures Addressing Impacts
<b>AESTHETICS:</b> Would the project:					
(a) Have a substantial adverse effect on a scenic vista?	Less than Significant	No	No	No	No
(b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact	No	No	No	No
(c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than Significant	No	No	No	No
(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less Than Significant	No	No	No	Yes

Since preparation and approval of the Certified EIR, the State of California adopted Senate Bill (SB) 743 (Public Resources Code (PRC) §21099(d)) that sets forth new guidelines for evaluating aesthetic impacts for an in-fill, transit-oriented project under CEQA. Specifically, the following: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” PRC Section 21099 defines a “transit priority area” as an area within 0.5 miles 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.” PRC 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.” PRC Section 21099 defines an “employment center project” as “a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 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 related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA.”<sup>2</sup>

With this, the Project Site and Approved Project qualifies as an infill transit-oriented project pursuant to PRC Section 21099. Specifically, per PRC Section 21099, an infill site is defined 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 currently complies with this definition as an infill site. Also, the Project Site is situated within a transit priority area, which is defined as an area within one-half mile of a major transit stop that is existing or planned. As disclosed in the Certified EIR, the Project Site is situated within multiple major transit stops within a one-half mile radius. In particular, the Project Site is located in an urban area served by multiple local bus lines that are adjacent to the Project Site and with service intervals of 15 minute or less during morning and afternoon peak commute periods. As such, the Project qualifies as an employment center project located in a transit priority area, and its aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. The following analysis regarding scenic vistas, scenic resources, consistency with applicable regulations governing scenic quality, and light and glare is provided for informational purposes only, and not for determining whether the Project will result in significant impacts to the environment.

### **3.1.1 Impact Determination in the EIR**

The Certified EIR concluded that impacts to scenic vistas would be less than significant. Regarding views and scenic vistas, view blockage impacts could occur to private views from surrounding residences and or commercial uses. However, the Approved Project would not obstruct public views of a scenic resource or impact a scenic vista. As such, impacts were less than significant.

The Certified EIR concluded that the Project Site is not located near a state designated scenic highway. No historic buildings or rock outcroppings are located on the Project Site. As such, the Project would not substantially damage scenic resources within a state scenic highway, and there would be no impacts related to this issue.

The Certified EIR concluded that the Approved Project would not conflict with applicable zoning and other regulations governing scenic quality and impacts would be less than significant. The Approved Project would be consistent with the applicable urban design guidelines and regulations of the City’s General Plan Framework, the Central City Community Plan, the Bunker Hill

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<sup>2</sup> City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Available at: <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>.



Design for Development, the Los Angeles Downtown Strategic Plan, and the Los Angeles the Civic Center Shared Facilities and Enhancement Plan. Nonetheless, Mitigation Measure C-1 was incorporated to further reduce potential impacts by requiring that temporary barriers and walkways be maintained in a visually attractive manner throughout the construction period. Finally, the Certified EIR concluded that light and glare impacts would be less than significant. The Approved Project would increase ambient light and artificial glare through the implementation street lighting, illuminated signs, architectural lighting, light spillage from the windows of high-rise buildings, special events lighting and security lighting. However, this would be similar to adjacent uses and would not significantly impact the environment, which is currently characterized by high levels of ambient light. The increase in ambient light and artificial glare would not be great enough to interfere with activities at nearby residential, office, and cultural uses. Nonetheless, two Mitigation Measures (MM C-2 and C-3) were included to further reduce impacts by requiring that building materials be designed to avoid glare and that architectural lighting is directed onto the building surfaces and has low reflectivity.

Aesthetic impacts associated with the Approved Project are evaluated in Section IV.C, of the Draft EIR.

### **Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?**

As described above the Modified Project would establish a Sign District for a comprehensive signage program in conjunction with the mixed-use development on Parcel Q, a 3.22-acre portion of the Grand Avenue Project. The signage program would include wall signs, projecting signs, monument signs, kiosk signs, window signs, digital displays, supergraphic signs, on- and off-site advertising, and other standard sign types. No other changes are proposed as part of the Modified Project. Specifically, the land use type, square footage, height, massing, development area, access, and other physical aspects of the Project would not change.

#### *(a) Would the Project have a substantial adverse effect on a scenic vista?*

Impacts to scenic vistas would remain less than significant as the Sign Program would not obscure public views. Similar to the analysis provided in the Certified EIR, signs could impact private views of surrounding residences and/or commercial uses, however CEQA is clear that obstruction of a few private views in a project's immediate vicinity is not generally regarded as a significant environmental impact (see *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572, 586-587)

#### *(b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

As the location of the Project Site remains the same, there are no state designated scenic highways nearby, no historic buildings and or rock outcroppings are located on the Site. Thus, the addition of the Sign Program would not substantially damage scenic resources within a state scenic highway and no impacts would occur.

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

Similar to the Approved Project, the Sign Program would not conflict with applicable zoning and other regulations governing scenic quality and impacts would be less than significant. Additionally, in 2018, the California Office of Planning and Research (OPR) provided comprehensive updates to the CEQA Guidelines. With this, several text revisions to the Appendix G Thresholds were made. In particular, the Aesthetics subcategory checklist question C was modified, which is discussed herein. Overall, the Sign Program would be consistent with the applicable urban design guidelines and regulations of the City's General Plan Framework, the Central City Community Plan, the Downtown Design Guidelines, the Bunker Hill Design for Development, the Los Angeles Downtown Strategic Plan, and the Los Angeles the Civic Center Shared Facilities and Enhancement Plan. Compliance with these guidelines would ensure that the Sign Program would not degrade the existing visual character or quality of public views of the site and its surroundings. Also, Mitigation Measure C-1 which was incorporated to further reduce potential impacts by requiring that temporary barriers and walkways be maintained in a visually attractive manner throughout the construction period would also be implemented during all sign installation if necessary.

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

With regards to light and glare impacts, similar to the Approved Project, the implementation of the Sign Program would not result in significant and unavoidable impacts. As discussed above, the Modified Project would introduce new illuminated signs to the Project Site. While this would increase ambient light and artificial glare, the Sign Ordinance would include lighting regulations specific to the Modified Project, including all illuminated signs shall be designed, located or screened so as to minimize to the greatest reasonable extent possible direct light sources onto any exterior wall of a residential unit and into the window of any commercial building. If signs are to be externally lit, the source of the external illumination shall be shielded from public view, each Digital Display shall be fully dimmable, and shall be controlled by a programmable timer so that luminance levels may be adjusted according to the time of day, and light trespass shall not exceed 3 foot-candles, as measured at any adjacent residential use.

The light and glare associated with the Sign Program would be similar to adjacent uses which is currently characterized by high levels of ambient light. The increase in ambient light and artificial glare would not be great enough to interfere with activities at nearby residential, office, and cultural uses. Further, Mitigation Measures (MM C-2 and C-3) were included in the Certified EIR to further reduce impacts by requiring that building materials be designed to avoid glare and that architectural lighting is directed onto the building surfaces and has low reflectivity.

Based on the above, no new project or cumulative aesthetic impacts would occur as a result of the Modified Project. Thus, aesthetic impacts associated with the Modified Project would be within the envelope of the impact set forth in the Certified EIR.

### **Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?**

Based on the above, there are no new circumstances involving new significant impacts or substantially more severe impacts related to aesthetics than previously analyzed in the Certified EIR.

### **Any New Information Requiring New Analysis or Verification?**

There is no new information of substantial importance that has become available relative to aesthetics impacts. No substantial changes in the environment related to aesthetics beyond those anticipated as part of the Approved Project have occurred since certification of the Certified EIR, and no new conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe aesthetics impacts, a review of additional feasible mitigation measures is not required.

### **EIR's Mitigation Measures Addressing Impact**

Pursuant to SB743, aesthetic impacts would not be significant or require mitigation. Nonetheless, the below Mitigation Measures required as part of the Approved Project would continue to be implemented as part of the Modified Project. In addition to these measures, the Project would comply with regulatory measures and provide project design features. The Modified Project would continue to implement the same regulatory measures, project design features and mitigation measures related to aesthetics set forth in the Certified EIR. No additional mitigation measures are required, as no new significant aesthetics impacts would result from implementation of the Modified Project.

**Mitigation Measure C-1:** During Project construction, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall ensure, through appropriate postings and daily visual inspections, that no unauthorized materials remain posted on any temporary construction barriers or temporary pedestrian walkways, and that any such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period. The City's Department of Building and Safety or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to construction of the Civic Park.

**Mitigation Measure C-2:** Prior to the start of each construction work phase, Related, with regard to the five development parcels, shall submit a design plan and technical analysis, prepared

by the Project's architect that demonstrates that the final selection of building materials for the five development parcels shall not create a significant glare impact on any offsite sensitive uses, including line-of-sight glare on any street or commercial, residential, or cultural use. The approved design plan shall be implemented by Related with regard to the five development parcels. The design plan and technical study shall be reviewed and approved by the Authority or other appropriate agency.

**Mitigation Measure C-3:** Prior to each construction phase, Related with regard to the five development parcels, shall prepare, and thereafter implement, plans and specifications to ensure that architectural lighting is directed onto the building surfaces and have low reflectivity in accordance with Illuminating Engineers Society (IES) standards to minimize glare and limit light onto adjacent properties.

### **3.1.2 Conclusion**

As demonstrated by the discussion above, aesthetic impacts associated with the Modified Project would be similar to or less than the impacts addressed in the Certified EIR and Subsequent Addenda. In particular, no substantial changes would occur with respect to the circumstances under which the Modified Project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. In addition, no new information of substantial importance has become available relative to any of the environmental topic categories that would result in new or more severe significant environmental impacts. Therefore, the Modified Project would not create any potential adverse impacts beyond those evaluated in the Certified EIR. As such, the preparation of an addendum that amends the Project Description in the Certified EIR to include the Modified Project is appropriate and fully complies with the requirements of PRC Section 21166 and CEQA Guidelines Sections 15162, 15163, and 15164.

## 3.2 LAND USE AND PLANNING

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's PDFs and/or Mitigation Measures Addressing Impacts
<b>LAND USE AND PLANNING:</b> Would the project:					
(a) Physically divide an established community?	Less Than Significant	No	No	No	No
(b) Cause significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant	No	No	No	No

### 3.2.1 Impact Determination in the EIR

With regard to land use, several text revisions to the Appendix G questions related to the evaluation of potential environmental impacts were made by the OPR in 2018. In particular, the Land Use subcategory checklist question B was modified, which is discussed herein.

The Certified EIR concluded that the Approved Project would be consistent with or complementary to existing uses and the Approved Project would physically and visually unify City and County government offices and support the Civic Center as a distinctive complex. As such, the Approved Project, was found to not divide an established community, given the type of proposed land uses to be implemented under the Certified EIR and the configuration and nature of the surrounding uses. Therefore, impacts were found to be less than significant.

The Certified EIR also concluded that the Approved Project would have less than significant impacts related to conflicts with any land use plan once entitlements were approved. In 2018, the OPR changed the language of this threshold to consider whether a project would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. It should be noted that while the Certified EIR generally acknowledged that signage would be included as part of the development of the Approved Project, specific sizes and locations of future signage were not discussed. However, it was assumed that signage was an inherent part of the overall design scheme of the development. The Certified EIR concluded that while there would be a significant impact to zoning under the existing zoning if the requested entitlements were not approved as part of the development, with the potential granting of zone changes and other entitlements, it would serve to mitigate potential significant zoning and policy impacts to a less than significant level, thus, no mitigation was necessary.

Land Use and Planning impacts associated with the Approved Project are evaluated in Section X., Land Use and Planning, of the Draft EIR.

**Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?**

*(a) Physically divide an established community?*

The implementation of the Sign Program at the Parcel Q site would not alter any Land Use significance conclusions identified in the Certified EIR. In particular, the Modified Project would not physically divide an established community, given the type of proposed land uses to be implemented under the Modified Project and the related Sign Program. The existing community as a whole is largely related to business, entertainment, and multi-family housing opportunities near mass transit. Proposing a Sign Program that takes advantage of these existing uses would not create a conflict or divide an established community. Therefore, impacts would be less than significant and similar to the Approved Project. The Sign Program would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified in the Certified EIR.

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

Similar to the Approved Project, the Signage Plan includes implementation of a Sign District, which would be considered in accordance with LAMC Sections 12.32 and 13.11, which would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, like the Approved Project, potential impacts under the Modified Project would be less than significant. Thus, the Sign Program would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified in the Certified EIR.

**Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?**

There is no new information of substantial importance that has become available relative to land use impacts. No substantial changes in the environment related to land use beyond those anticipated as part of the Approved Project have occurred since certification of the Certified EIR, and no new conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe impacts, a review of additional feasible mitigation measures is not required. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

### **Any New Information Requiring New Analysis or Verification?**

There is no new information of substantial importance that has become available relative to Land Use and Planning impacts. No substantial changes in the environment related to land use and planning beyond those anticipated as part of the Approved Project have occurred since certification of the Certified EIR, and no new conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe Land Use and Planning impacts, a review of additional feasible mitigation measures is not required.

### **EIR's Mitigation Measures Addressing Impact**

Since the EIR determined the Approved Project would have no significant impacts on land use and planning if the zoning entitlements were approved, no mitigation measures were required. Implementation of the Modified Project does not change these impact determinations. Therefore, no additional mitigation measures are required as no new significant impacts would result from the Modified Project. Based on the above, the Modified Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines sections 15162 or 15163 that would require the preparation of a supplemental or subsequent EIR.

#### **3.2.1 Conclusion**

As demonstrated by the discussion above, potential land use and planning impacts associated with the Modified Project would be similar to or less than the impacts addressed in the Certified EIR and Subsequent Addenda. No substantial changes would occur with respect to the circumstances under which the Modified Project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. In addition, no new information of substantial importance has become available relative to any of the environmental topic categories that would result in new or more severe significant environmental impacts. The relevant mitigation measures included as part of the Certified EIR would continue to be implemented under the Modified Project and under the Sign District as applicable. As all of the impacts would be within the envelope of impacts analyzed in the Certified EIR and Subsequent Addenda, none of the conditions described in PRC Section 21166 and CEQA Guidelines Sections 15162 and 15163 requiring a Supplemental or Subsequent EIR would occur. Therefore, the Modified Project would not create any potential adverse impacts beyond those evaluated in the Certified EIR. As such, the preparation of an addendum that amends the Project Description in the Certified EIR to include the Modified Project is appropriate and fully complies with the requirements of PRC Section 21166 and CEQA Guidelines Sections 15162, 15163, and 15164.

### 3.3 TRANSPORTATION

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's PDFs and/or Mitigation Measures Addressing Impacts
<b>TRANSPORTATION:</b> Would the project:					
(a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Sig and Unavoidable	No	No	No	No
(b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	N/A	N/A	N/A	N/A	N/A
(c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than Significant	No	No	No	No
(d) Result in inadequate emergency access?	Less Than Significant	No	No	No	Yes

#### 3.3.1 Impact Determination in the EIR

With regard to transportation, several text revisions to the sample questions related to the evaluation of potential environmental impacts were made by the OPR in 2018. In particular, the Traffic subcategory checklist question B was modified, which is discussed below.

With regard to construction impacts, the Certified EIR examined potential traffic impacts during construction that would be associated with haul trips, worker trips, temporary lane closures, pedestrian access, reconstruction of the Civic Center Mall ramps, bus stop relocation and construction worker parking. The Certified EIR concluded that, because some of the daily haul truck trips during construction could occur during the a.m. peak hour, a short-term significant impact would occur. The Certified EIR concluded that temporary lane closures up to 24 months in duration would cause significant traffic impacts during the time of such closures and concluded that diversion of traffic caused by the temporary closure of the Civic Center Mall ramps could potentially create short-term traffic impacts. The Certified EIR also concluded that the need for parking for up to 600 construction workers would cause potential impacts on parking supply in the area. Lastly, the Certified EIR concluded that impacts associated with worker trips, pedestrian access, and bus stop relocation would be less than significant.

With regard to operational traffic impacts, the Approved Project with County Office Building Option prior to mitigation would generate approximately 1,551 A.M. peak hour trips and 2,464 P.M. peak hour trips. This Option would result in significant traffic impacts at seven intersections in the A.M. peak hour and in significant traffic impacts at seventeen intersections in the P.M. peak hour.



The Approved Project with Additional Residential Development Option would generate approximately 1,019 trips in the A.M. peak hour and 2,003 trips in the P.M. peak hour. These levels of peak hour trip generation are 34 percent and 19 percent lower than the A.M. and P.M. peak hour trip generation levels associated with the Approved Project with County Office Building Option, respectively. Prior to mitigation, the Additional Residential Development Option would result in a significant traffic impact at six intersections in the A.M. peak hour and seventeen intersections in the P.M. peak hour. The Project with County Office Building Option was found to cause two significant traffic impacts on the freeway system, one of which would occur at a CMP monitoring location (US-101 Hollywood Freeway north of Vignes Street). However, the Project with Additional Residential Development Option would cause no significant freeway traffic impacts.

With the implementation of the intersection mitigation measures in the Approved Project, one intersection in the A.M. peak hour and 13 intersections in the P.M. peak hour would be significantly and unavoidably impacted under the Project with County Office Building Option. In addition, this Option's significant impact on the CMP network would be reduced to a less than a significant level with ATCS mitigation. With the implementation of ATCS mitigation measures, no intersections in the A.M. peak hour and 7 intersections in the P.M. peak hour would be significantly and unavoidably impacted under the Project with Additional Residential Development Option.

Additionally, it was found that the Approved Project would not substantially increase hazards due to a geometric design feature or incompatible use. Thus, potential impacts were found to be less than significant.

Transportation impacts associated with the Approved Project are evaluated in Section IV.B., Traffic, Circulation, and Parking, of the Draft EIR.

### **Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?**

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

The Sign District would not conflict with a program, plan, ordinance or policy addressing the circulation system as outlined in the City of Los Angeles Department of Transportation's Transportation Assessment Guidelines (2020 LADOT TAG). Construction activities associated with the Sign District would be the same, or less, as those identified under the Approved Project. The Modified Project would not affect the closure of the Civic Center Mall ramps, and no change to the significant short-term traffic impact under the Approved Project would occur. The impacts of worker trips, pedestrian access and bus stop relocation, which would be less than significant under the Approved Project, would be the same or lower under the Modified Project.

As required by the 2020 LADOT TAG, the ordinances, plans, policies, and programs listed below were reviewed for consistency with the Project. In short, the City has adopted programs, plans, ordinances and policies that establish the transportation planning framework for all travel modes.

The overall goals of these policies are to achieve a safe, accessible and sustainable transportation system for all users. Per the 2020 LADOT TAG, Section 2.1.4. states that a project which generally conforms with and does not obstruct the City's development policies and standards will generally be considered to be consistent. The environmental analysis must provide substantiating information to help determine whether a project precludes the City's implementation of any adopted policy and/or program that was adopted to protect the environment.

These plans, policies, and programs are listed below and discussed in further detail thereafter:

1. Mobility Plan 2035
2. Plan for Healthy LA
3. Specific Plans
4. LAMC Section 12.21.A.16 (Bicycle Parking)
5. LAMC Section 12.26.J (TDM Ordinance)
6. Vision Zero Action Plan
7. Vision Zero Corridor Plans
8. Streetscape Plans
9. Citywide Design Guidelines

1. Mobility Plan 2035

*Policy 2.3 Pedestrian Infrastructure – Recognize walking as a component of every trip and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.*

The Modified Project would support pedestrian wayfinding (that is not in the right of way) and circulation, and not impede the implementation of any pedestrian infrastructure. Therefore, the Modified Project would not conflict with this policy.

*Policy 2.4 Neighborhood Enhanced Network – Provide a slow speed network of locally serving streets.*

This is a citywide policy that does not apply to the Modified Project because no changes to the adjacent streets would occur with implementation of the Sign District. Therefore, the Modified Project would not conflict with this policy.

*Policy 2.5 Transit Network—Improve the performance and reliability of existing and future bus service.*

This is a citywide policy that does not apply to the Modified Project as the Sign District would not impact existing or future bus service. Therefore, the Modified Project would not conflict with this policy.

*Policy 2.6 Bicycle Networks – Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.*

This is a citywide policy that does not apply to the Modified Project as the Sign District would not impact existing or future bicycle facilities. Therefore, the Modified Project would not conflict with this policy.

*Policy 2.7 Vehicle Network – Provide vehicular access to the regional freeway system.*

This is a citywide policy that does not apply to the Modified Project because no changes to the adjacent streets would occur with implementation of the Sign District. Therefore, the Modified Project would not conflict with this policy.

*Policy 2.10 Loading Areas – Facilitate the provision of adequate on and off-street loading areas.*

This is a citywide policy that does not apply to the Modified Project as the Sign District would not result in the addition or removal of any loading areas. Therefore, the Modified Project would not conflict with this policy.

#### *Mobility Plan Programs PL.1 and PK.10*

Mobility Plan Program PL.1 requires driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement. Implementation of the Modified Project would not impede access to buildings from non-arterial streets or alleys. Therefore, the Modified Project would not conflict with this program.

Mobility Plan Program PK.10 directs the City to establish an incentive program to encourage projects to retrofit parking lots, structures, and driveways to include pedestrian design features. Implementation of the Modified Project would not impede the establishment of an incentive program. Therefore, the Modified Project would not conflict with this program.

## 2. Plan for a Healthy Los Angeles

The Plan for a Healthy Los Angeles is an Element of the City's General Plan that provides a high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. A subsection of the Healthy Element provides health-related policies for several categories, one of which includes transportation. Overall,

the Modified Project would not detract the City from achieving those policies, such as traffic management and additional local bus services. The proposed Sign District would not preclude the City from achieving its healthy living goals. Therefore, the Modified Project would not conflict with the Plan for a Healthy Los Angeles Element.

### 3. Specific Plans

The Project is located within the Bunker Hill Specific Plan Area. As noted within the Specific Plan, several parking regulations and parking standards related transportation are listed. None of these parking standards would be altered with implementation of the Modified Project. Additionally, pedestrian access would be maintained and no conflict with the Bunker Hill Specific Plan transportation policies would occur.

### 4. LAMC Section 12.21.A.16 (Bicycle Parking)

LAMC Section 12.21.A.16 establishes parameters related to bicycle parking spaces and facilities for employee showers and lockers. The Modified Project, which is strictly a Sign District, does not propose bicycle parking spaces or shower facilities. Thus, the Modified Project would not conflict with this section of the City's Municipal Code.

### 5. LAMC Section 12.26.J (TDM Ordinance)

LAMC Section 12.21.J. establishes parameters related to transportation demand management (TDM) and trip reduction measures. The Sign District would not conflict with an established or planned TDM or related trip reduction measures. Thus, the Modified Project would not conflict with this section of the City's Municipal Code.

### 6. Vision Zero Action Plan

While no Vision Zero Safety Improvements are currently planned near the Project Site, Project signage improvements associated with the pedestrian environment would not preclude future action plan improvements by the City. Therefore, the Modified Project would not conflict with the Vision Zero Action Plan.

### 7. Vision Zero Corridor Plans

While no Vision Zero Safety Improvements are currently planned near the Project Site, signage improvements associated with the pedestrian environment would not preclude future corridor plan improvements by the City. Therefore, the Modified Project would not conflict with the Vision Zero Corridor Plans.

### 8. Streetscape Plans

The location of the Modified Project is currently not within a designated City of Los Angeles Streetscape Plan area. Therefore, the Modified Project would not conflict with any streetscape plans.

## 9. Citywide Design Guidelines

*Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all.*

The Modified Project would support pedestrian wayfinding (that is not in the right of way) and circulation. Therefore, the Modified Project would not conflict with this guideline

*Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.*

Citywide Design Guideline 2 recommends incorporating vehicular access such that it does not discourage and/or inhibit the pedestrian experience. Specifically, Guideline 2 calls for prioritizing pedestrian access first and automobile access second; orienting parking and driveways toward the rear or side of buildings and away from the public; and on corner lots, orienting parking as far from the corner as possible. The Approved Project would prioritize pedestrian access by providing multiple pedestrian access points and no changes would occur to the pedestrian access points under the Modified Project. Modified Thus, the Modified Project would not conflict with this guideline.

*Guideline 3: Design projects to actively engage with streets and public space and maintain the human scale.*

The Modified Project would include pedestrian level signage that would result in engagement with the street at the human scale. Thus, the Modified Project would not conflict with this guideline.

As such, the Sign District would not result in any new significant impacts or substantial increase in the severity of previously-identified impacts in the Certified EIR with respect to its potential to conflict with a program, plan, or ordinance.

*New Question (b)—Impacts Related to Conflicts with CEQA Guidelines Section 15064.3, subdivision (b):*

As discussed above, in response to Senate Bill 743, CEQA Guidelines Section 15064.3 was added to the 2019 update to the CEQA Guidelines pertaining to VMT based analysis of transportation impacts. A VMT analysis was not performed for the Approved Project, as it was not required at the time the Certified EIR was prepared. Nonetheless, CEQA Guidelines Section 15064.3(b)(1) states that “generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact.” The Project Site is well served by existing transit and is in downtown Los Angeles, the hub of the regional transit system in the Los Angeles area. In addition, the 2016–2040 RTP/SCS designates the area in which the Project Site is located as a high quality transit area. Furthermore, the Sign Program would support the goals and principles set forth in the 2016–2040 RTP/SCS through the enhancement of proposed development within an urban, infill area that is well served by transit. Signage is not linked to VMT generation and would not directly or indirectly result in new significant traffic impacts or a substantial increase in the severity of already identified

significant impacts. Thus, impacts would be within the impact envelope established in the Certified EIR.

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

Operational activities related to geometric design features associated with implementation of a Sign Program would not result in any new significant impacts or substantially increase in the severity of a previously-identified impact. Signage at the Project Site would encompass several styles, sizes, and colors, none of which would create a hazard due to a geometric design. Specifically, the Project does not include any sharp curves, dangerous intersections, or incompatible uses. No off-site traffic improvements are proposed or warranted in the area surrounding the Project Site. Therefore, the Sign Program would not result in new significant traffic impacts or a substantial increase in the severity of already identified significant impacts. Impacts would be within the impact envelope established in the Certified EIR.

*(d) Result in inadequate emergency access?*

Operational activities associated with implementation of a Sign Program would not result in any new significant impacts or substantially increase in the severity of a previously-identified impact. Signage will also be used as directional wayfinding to help direct on-site and off-site traffic for cars traveling to and from the Project Site in order to help maintain emergency access to the Site. These types of signs would help alleviate congestion and on-site movement of vehicles. In summary, implementation of the Sign Program would not result in inadequate emergency access to the Project Site, similar to the Approved Project. Therefore, the Sign Program would not involve significant environmental effects or a substantial increase in the severity of previously-identified impacts in the Certified EIR with respect to operational traffic.

### **Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?**

There is no new information of substantial importance that has become available relative to traffic impacts. No substantial changes in the environment related to traffic beyond those anticipated as part of the Approved Project have occurred since certification of the Certified EIR, and no new conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe impacts, a review of additional feasible mitigation measures is not required. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

### **Any New Information Requiring New Analysis or Verification?**

There is no new information of substantial importance that has become available relative to Transportation impacts. No substantial changes in the environment related to transportation beyond

those anticipated as part of the Approved Project have occurred since certification of the Certified EIR, and no new conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe Transportation impacts, a review of additional feasible mitigation measures is not required.

### **EIR's Mitigation Measures Addressing Impact**

The Mitigation Measures below, required as part of the Approved Project would continue to be implemented as part of the Modified Project. In addition to these measures, the Project would comply with regulatory measures and provide project design features which further reduce the Project's impacts. The Modified Project would continue to implement the same project design features and mitigation measures related to Transportation set forth in the Certified EIR. No additional measures are required, as no new significant Transportation impacts would result from implementation of the Sign Program.

**Mitigation Measure B-1:** The developer with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall prepare, prior to the start of each construction work phase, a Construction Traffic Control/Management Plan ("Plan") to be approved by the City of Los Angeles Department of Transportation ("LADOT") and implemented by the responsible party. The Plan shall include, but not be limited to, Project scheduling, the location and timing of any temporary land closures, traffic detours, haul routes, temporary roadway striping, and signage for traffic flow, as necessary, as well as the identification and signage of alternative pedestrian routes in the immediate vicinity of the Project, if necessary. The Plan should also provide for the coordination of construction areas, and for safe pedestrian movement throughout the Project Area such that adequate and safe pedestrian movement access is maintained to adjacent uses including the Walt Disney Concert Hall, the Music Center, the County Courthouse, and the Metro Red Line station portals (on Parcel W-2 and on the Court of Flags).

**Mitigation Measure B-2:** After approval of the Construction Traffic Control/Management Plan(s) required under Mitigation Measure B-1 and prior to the start of each construction work phase, the developer with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall submit a copy of the Plan(s) to the Authority or other appropriate agency, the City Chief Administrative Officer or designee, and the County of Los Angeles Chief Administrative Officer ("County CAO"). Following receipt of the Plan(s), the County CAO shall distribute that information to all County properties on Grand Avenue, including the Hall of Administration, County Courthouse, the Walt Disney Concert Hall, and the Music Center, for further distribution of information to employees and visitors on construction schedules, alternative travel routes, and land and sidewalk closure information, as appropriate, and the Authority or other appropriate agency, or the City, shall distribute to the appropriate City departments for the same purpose.

**Mitigation Measure B-3:** Prior to the start of each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall enter into one or more temporary arrangements with parking garages in the area of the Project, or with surface lot operators elsewhere in downtown or its periphery, to provide a sufficient supply of off street spaces for the construction workers during Project construction, and will require all construction workers to use these designated parking spaces. These temporary arrangements shall be to the satisfaction of (i) CRA/LA or (ii) the County's CAO or its designee.

**Mitigation Measure B-4:** If the Project proceeds with the County office building option, the County, on an on-going basis following initial occupancy, shall fund and implement a Transportation Demand Management (TDM) program for the proposed County office use in Parcel W-1/W-2. The County's CAO shall ensure the County's review and approval of this TDM program. The TDM program could, for example, include an onsite transportation coordinator, post information on transit, and provide logistical support for the formation of carpools and vanpools, and other incentives to use transit and rideshare.

**Mitigation Measure B-5:** The developer, with regard to the five development parcels, shall implement ATCS in conjunction with the area-wide ATCS program, if not otherwise implemented, prior to the completion of the first phase of development at the intersections identified by LADOT, although the implementation of this measure will provide mitigation to all three Project phases. Implementation of ATCS shall occur in the northern part of downtown, north of Eighth Street, at the locations identified by LADOT. LADOT has determined that implementation of the ATCS mitigation improvements in the area surrounding the Project would comprise the following: (1) upgrades to Model 2070 traffic signal controllers at 35 intersections; (2) installation of 58 ATSAC/ATCS system vehicle detectors at 9 intersections; and (3) installation of CCTV cameras to provide video information to the ATSAC Center at eight locations. Subject to a final determination by LADOT of the improvements required for the Project, ATCS shall also include LADOT's Transit Priority System (TPS).

**Mitigation Measure B-6:** The following menu of mitigation measures have been developed to further reduce the Project's potential traffic and circulation impacts. The term "menu" refers to the various ways that each of the following measures can be implemented to achieve trip reduction. Selection shall be coordinated with the LADOT, who shall determine which of the mitigation measures are to be implemented.

- Provide enhanced walking connections along the Project street frontages to transit service (to bus stops and to the Red Line station portals at First Street and Hill Street). These could comprise pedestrian amenities along the Project's street frontages, including landscaped sidewalks, wider crosswalks where feasible at key intersections, improved lighting for pedestrian safety at nighttime, and pedestrian wayfinding signage, to facilitate walking in the Project area. The developer shall implement this measure with regard to the five development parcels prior to initial building occupancy for each development phase; while, the responsible



parties for the implementation of the Civic Park and Streetscape Program, under the applicable agreements, shall implement these measures prior to the completion of construction for each of these Project components.

- The developer, as determined by LADOT and prior to initial building occupancy for each development phase, shall provide enhanced bus stops on the street frontages of the five development parcels. These enhanced bus stops may include bus shelters with passenger amenities such as benches, shaded areas, and transit information, that could be integrated into the overall urban design/landscaping of the Project.
- Provide transit information kiosks at various strategic locations on the Project site. The developer shall implement this measure with regard to the five development parcels prior to initial building occupancy for each development phase; while, the responsible parties for the implementation of the Civic Park and Streetscape Program, under the applicable agreements, shall implement these measures prior to the completion of construction for each of those Project components.

The developer, with regard to the five development parcels, shall participate in an on-going basis during Project operations, in a Share-Car program (e.g., Flexcar) that makes cars available to registered members. It is anticipated that up to three on-street parking spaces, subject to a determination of feasibility by LADOT, could be provided at key locations adjacent to the Project frontage for up to three Share-Cars. The Share-Cars could be available to both Project and non-Project users as long as they were members of the Share-Car program. The Project shall support a Share-Car organization's application to the City and following any implementation of such application shall promote the Share-Car concept and encourage its usage with Project residents and tenants.

- Provide improved vehicular directional signage on surface streets approaching and within the Project area to direct vehicles to specific destinations and parking locations, as appropriate, to minimize vehicles circulating in the Project area. Such signage should be approved to the satisfaction of LADOT. The developer shall implement this measure with regard to the five development parcels prior to initial building occupancy for each development phase; while, the responsible parties for the implementation of the Civic Park under the applicable agreements, shall implement these measures prior to the completion of construction for the Civic Park.

**Mitigation Measure B-7:** The Developer, with regard to the five development parcels, shall re-stripe the westbound approach of the Third Street and Hill Street intersection from the existing configuration of one left turn lane, one through lane, and one shared through/right-turn lane to a future configuration of one left turn lane, two through lanes, and one exclusive right-turn lane. This improvement would require a slight widening of Third Street west of Hill Street before the entrance to the tunnel within the public right-of-way. The final lane configuration of this intersection shall be to the satisfaction of the City of Los Angeles Department of Transportation. In addition, any street

widening, and construction activities shall be coordinated with the City of Los Angeles Department of Public Works, Bureau of Engineering.

### **3.2.1 Conclusion**

As demonstrated by the discussion above, potential transportation impacts associated with the Modified Project would be similar to or less than the impacts addressed in the Certified EIR and Subsequent Addenda. No substantial changes would occur with respect to the circumstances under which the Modified Project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. In addition, no new transportation or parking information of substantial importance has become available relative to any of the environmental topic categories that would result in new or more severe significant transportation related impacts. The relevant mitigation measures included as part of the Certified EIR would continue to be implemented under the Modified Project as applicable. As such, the preparation of an addendum that amends the Project Description in the Certified EIR to include the Modified Project is appropriate and fully complies with the requirements of PRC Section 21166 and CEQA Guidelines Sections 15162, 15163, and 15164.