## INITIAL STUDY

## Times Mirror Square Project

Case Number: ENV-2016-4676-EIR

**Project Addresses:** 121, 145, 147 S. Spring Street; 100, 102, 106, 108, 110, 118, 120, 124, 126, 128, 130, 140, 142 S. Broadway; 202, 212, 214, 220, 224, 228, 230, 234 W. 1st Street; 205, 211, 221 W. 2nd Street, Los Angeles,

California 90012

Community Plan Area: Central City

Council District: 14 - Huizar

**Project Description:** The Times Mirror Square Project would develop a new mixed-use development and rehabilitate the Times, Plant, and Mirror Buildings on the approximately 3.6-acre city block bounded by W. 1st Street, S. Spring Street, W. 2nd Street, and S. Broadway Street in the Center City/Historic Core District of Downtown Los Angeles (Project). New development, consisting of the 37-story "North Tower" and 53-story "South Tower" would be located in the west sector of the block, which is oriented toward S. Broadway, with frontages on W. 1st Street and W. 2nd Street. The existing Executive Building at the corner of W. 1st Street and S. Broadway and parking garage at the corner of W. 2nd Street and S. Broadway would be demolished to allow for the development of the Project's new mixed-use component (North and South Towers). The North and South Towers, which would be constructed above a five-story parking podium, would contain a total of approximately 1,127 residential units and approximately 34,572 square feet of commercial floor area. The parking podium would be an above-ground structure forming the streetfront of the new development and base for the residential towers. The space below the podium would contain an additional nine levels of subterranean parking. The combined commercial and residential floor area would total approximately 1,135,803 square feet. The existing Times, Plant, and Mirror Buildings have a combined floor area of 376,105 square feet. In total, including new construction and existing buildings to remain, the Project proposes approximately 1,511,908 square feet of floor area. This would result in a floor area ratio (FAR) of 9.42:1 Please see Attachment A for further detail.

#### PREPARED FOR:

The City of Los Angeles Department of City Planning

> PREPARED BY: ESA PCR

#### **APPLICANT:**

Onni Times Square LP

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#### **CITY OF LOS ANGELES**

OFFICE OF THE CITY CLERK ROOM 360, CITY HALL LOS ANGELES, CALIFORNIA 90012

#### CALIFORNIA ENVIRONMENTAL QUALITY ACT

# INITIAL STUDY AND APPENDIX G CHECKLIST

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE			
City of Los Angeles, Department of City Planning	14	June 30, 2017			
RESPONSIBLE AGENCIES					
City of Los Angeles, Department of City Planning					
PROJECT TITLE/NO.	CASE NO.				
Times Mirror Square	ENV-2016-4676-EIR				
PREVIOUS ACTIONS CASE NO. N/A	<ul> <li>□ DOES have significant changes from previous actions.</li> <li>□ DOES NOT have significant changes from previous actions.</li> </ul>				

#### PROJECT DESCRIPTION:

The Project proposes to construct a new mixed-use development and to rehabilitate the Times, Plant, and Mirror Buildings on the approximately 3.6-acre city block bounded by W. 1<sup>st</sup> Street, S. Spring Street, W. 2<sup>nd</sup> Street, and S. Broadway Street in the Center City/Historic Core District of Downtown Los Angeles ("Project"). New development, consisting of the 37-story "North Tower" and 53-story "South Tower" would be located in the west sector of the block, which is oriented toward S. Broadway, with frontages on W. 1st Street and W. 2nd Street. The existing Executive Building at the corner of W. 1st Street and S. Broadway and parking garage at the corner of W. 2nd Street and S. Broadway would be demolished to allow for the development of the Project's new mixed-use component. The North and South Towers, which would be constructed above a 5-story parking podium, would contain a total of approximately 1,127 residential units and approximately 34,572 square feet of commercial floor area. The parking podium would be an above-ground structure forming the street front of the new development and base for the residential towers. The space below the podium would contain an additional nine levels of subterranean parking. The combined commercial and residential floor area would total approximately 1,135,803 square feet. The existing Times, Plant, and Mirror Buildings have a combined floor area of 376,105 square feet. In total, including new construction and existing buildings to remain, the Project proposes approximately 1,511,908 square feet of floor area. This would result in a floor area ratio ("FAR") of 9.42 on the 3.6-acre site.

An open-to-the-sky pedestrian paseo ("Paseo") leading from W. 1st Street to W. 2nd Street would bisect the block between the new towers and the renovated Times, Plant, and Mirror Buildings. The First and Broadway Civic Center Park would be visible from throughout the Paseo. Ground level retail uses would be located along the Paseo and along the base of the parking podium facing W. 1st Street, S. Broadway, and W. 2nd Street. A 50,000-square-foot grocery store would be accessed via the Paseo and the location of the original loading docks on S. Spring Street. The Project anticipates the re-use of the Times, Plant, and Mirror Buildings for office, retail, and restaurant purposes appropriate to the Downtown setting, and as the location of the grocery store.

The Project Site is zoned C2-4D-SN, which permits general commercial and multi-family residential uses. The 4D Height District establishes a Floor Area Ratio (FAR) of 6.0:1, but does not specifically limit building heights. The Project Site is also located within the Central City TFAR area, Greater Downtown Housing Incentive Area, Downtown Adaptive Reuse Area, Downtown Design Guide Project area, and the Central City and Downtown parking districts. The Downtown TFAR designation allows for the transfer of floor area rights from a donor site to increase FAR over the existing zoning designation. The Greater Downtown Housing Incentive Area was established to encourage the construction of new, economically diverse urban infill housing. The Project Site is also located within a Transit Priority Area (TPA) because of proximity to Metro's Civic Center/Grand Park Station, located approximately 750 feet to the northwest, and directly across W. 2nd Avenue from Metro's 2nd Street/Broadway Station, one of the three stations on Metro's Regional Connector Line, currently under development.

The entitlements being requested for the Project include, but may not be limited to, the following:

- Transfer of Floor Area Rights (TFAR) greater than 50,000 square feet of floor area for the transfer of 548,440 square feet of floor area from the Los Angeles Convention Center (Donor Site) to the Project Site (Receiver Site) (LAMC Sec. 14.5.6-B).
- Vesting Conditional Use Permit to permit floor averaging within a unified development (LAMC Sec. 12.24-W,19).
- Master Conditional Use Permit (MCUB) to permit the on-site and off-site sale and consumption of alcoholic beverages within the Project's commercial retail spaces (LAMC Sec. 12.24-W,1).
- Vesting Tentative Tract Map for the merger and re-subdivision of the Project Site for condominium purposes (LAMC Sec. 17.15). The Applicant is requesting to provide parking per LAMC requirements in lieu of the parking requirements under the Advisory Agency's Parking Policy for Condominiums.
- Construction permits, including building, grading, excavation, foundation, and associated permits.
- Haul Route Permit, as may be required.
- Other approvals as needed.

#### **ENVIRONMENTAL SETTING:**

The Project Site is located within the northern portion of the City of Los Angeles Center City/Historic Core. This district, which extends from W. 1st Street to W. 11th Street, between Los Angeles and Hill Streets, includes Los Angeles City Hall, Los Angeles County courts and law library, federal offices and courts, LAPD Headquarters, CalTrans Regional Offices, Grand Park, and other civic facilities. The Project Site is currently developed with five buildings, including the Times Building, Mirror Building, Plant Building, Executive Building, and a six-level parking structure. The Times, Mirror, and Plant Buildings are listed in the National Register of Historic Places and the California Register of Historic Places. The Mirror Building was also recommended as eligible at the local level through SurveyLA. The City's Historic Core, which is centered on S. Spring Street and S. Broadway, forms the spine through the Downtown that links the Financial District and Bunker Hill to the west, South Park and the Convention Center to the south, the South Markets to the southeast, and Little Tokyo and the Arts District to the east. The Downtown area is characterized by a concentration of government-related uses, high- and mid-rise office buildings, residential buildings, hotels, retail uses, museums, and cultural districts, including the "Arts" and "Markets" districts. The Historic Core/Center City also contains a concentration of architecturally significant buildings, including a number of nationally recognized historic theater buildings, Los Angeles City Hall, Walt Disney Concert Hall, and buildings within the Project Site.

#### PROJECT LOCATION:

100 S. Broadway, Los Angeles, CA 90012

PLANNING DISTRICT	STATUS:					
Central City Community Plan			☐ PRELIMINARY ☐ PROPOSED ☑ ADOPTED			
EXISTING ZONING	MAX. DENSITY ZONING					
C2-4D-SN	FAR of 6.0:1 (based on Height District 4D)		☑ DOES CONFORM TO PLAN			
GENERAL PLAN LAND USE & ZONE(S)	MAX. DENSITY PLAN		☐ DOES NOT CONFORM TO PLAN			
Regional Center Commercial	FAR of 6.0:1 (Land Use Map Footnote 3, allows floor area up to 10.0:1 or 13.0:1, with transfer of floor area.)					
SURROUNDING LAND USES	PROJECT DENSITY					
See Attachment A, Project Description, for further discussion.	FAR 9.42:1		☐ NO DISTRICT PLAN			

## **DETERMINATION** (To be completed by Lead Agency)

On the basis of this initial evaluation:	
☐ I find that the proposed project COULD NOT have a sign DECLARATION will be prepared.	nificant effect on the environment, and a NEGATIVE
☐ I find that although the proposed project could have a significant effect in this case because revisions on the project proponent. A MITIGATED NEGATIVE DECLARATION will be	, , , , ,
☐ I find the proposed project MAY have a significant effect REPORT is required.	ct on the environment, and an ENVIRONMENTAL IMPACT
impact on the environment, but at least one effect 1) has be to applicable legal standards, and 2) has been addressed by	nificant impact" or "potentially significant unless mitigated" been adequately analyzed in an earlier document pursuant y mitigation measures based on earlier analysis as described is required, but it must analyze only the effects that remain
significant effects (a) have been analyzed adequately in an	ed pursuant to that earlier EIR or NEGATIVE DECLARATION,
Mi hm	City Planning Associate
SIGNATURE	TITLE

#### **EVALUATION OF ENVIRONMENTAL IMPACTS:**

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

ENVIRONMENTAL FACTORS POTENTIA	ALLY AFFECTED:	
	low would be potentially affected by thi indicated by the checklist on the following	s project, involving at least one impact that ng pages.
Aesthetics	☐ Hazards & Hazardous Materials	□ Public Services
☐ Agriculture and Forestry Resources		□ Recreation
	□ Land Use/Planning	
☐ Biological Resources	☐ Mineral Resources	
□ Cultural Resources	⊠ Noise	☑ Utilities/Service Systems
☐ Geology/Soils	☑ Population/Housing	
BACKGROUND		
PROPONENT NAME		PHONE NUMBER
Onni Times Square LP		(213) 629-2041
PROPONENT ADDRESS		-
315 W. 9 <sup>th</sup> Street, Suite 801, Los Angel	es, CA 90015	
AGENCY REQUIRING CHECKLIST		DATE SUBMITTED
City of Los Angeles, Department of Cit	y Planning, Major Projects Section	June 30, 2017
PROPOSAL NAME (If Applicable)		,
Times Mirror Square		

## ENVIRONMENTAL IMPACTS

(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?				
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, $PM_{10}$ , and $PM_{2.5}$ ) under an applicable federal or state ambient air quality standard?				
d. Expose sensitive receptors to substantial pollutant concentrations?				
e. Create objectionable odors affecting a substantial number of people?				
IV. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California of Fish and Game or U.S. Fish and Wildlife Service?				
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				

Less Than

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines §15064.5?				
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?				
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				
d. Disturb any human remains, including those interred outside of formal cemeteries?				
VI. GEOLOGY AND SOILS. Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of existing environmental conditions. Refer to Division of Mines and Geology Special Publication 42.				
ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?				
iii. Seismic-related ground failure, including liquefaction caused in whole or in part by the project's exacerbation of the existing environmental conditions?				
iv. Landslides caused in whole or in part by the project's exacerbation of the existing environmental conditions?				
b. Result in substantial soil erosion or the loss of topsoil?				
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse caused in whole or in part by the project's exacerbation of the existing environmental conditions?				
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?				

		Less Than		
	Potentially	Significant with	Less Than	
	Significant Impact	Mitigation Incorporated	Significant Impact	No Impact
	Пірасі	mcorporated —	ППраст	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				
VII. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				
<b>VIII. HAZARDS AND HAZARDOUS MATERIALS.</b> Would the project:				
p				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?				
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 have the potential to exacerbate current environmental conditions so as to result in a safety hazard for people residing or working in the project area?				
f. For a project within the vicinity of a private airstrip, would the project have the potential to exacerbate current environmental conditions so as to result in a safety hazard for people residing or working in the project area?				
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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, caused in whole or in part from the project's exacerbation of existing environmental conditions?				
IX. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements?				
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?				
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?				
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?				
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				
f. Otherwise substantially degrade water quality?				
g. Place housing within a 100-year flood hazard area as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?			$\boxtimes$	
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				
j. Inundation by seiche, tsunami, or mudflow?				
X. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?			$\boxtimes$	

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?				
XI. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				
XII. NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	$\boxtimes$			
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				
XIII. POPULATION AND HOUSING. Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Displace substantial numbers of people, necessitating the				$\square$
construction of replacement housing elsewhere?				
<b>XIV. PUBLIC SERVICES.</b> Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	$\boxtimes$			
b. Police protection?	$\boxtimes$			
c. Schools?				
d. Parks?	$\boxtimes$			
e. Other public facilities?				
XV. RECREATION.	_		_	_
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				
XVI. TRANSPORTATION/TRAFFIC. Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?				
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?				
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				

		Less Than		
	Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Result in inadequate emergency access?				
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				
XVII. TRIBAL CULTURAL RESOURCES. Would the project:				
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?				
b. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?				
XVIII. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				
g. Comply with federal, state, and local statutes and regulations related to solid waste?				
XVX. 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?				
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).				
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				

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

PREPARED BY	TITLE	TELEPHONE #	DATE
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## **INITIAL STUDY**

# Attachment A: Project Description

### A. Introduction

The Project proposes to develop the Times Mirror Square Project (Project) which would include construction of two new mixed-use towers along with rehabilitation of three existing buildings, including an eight-story building (Times Building), a four-story building (Plant Building) and a 10-story building (Mirror Building) within the Times Mirror Square site. The Times Mirror Square site (Project Site) comprises the city block bounded by W. 1st Street, S. Spring Street, W. 2<sup>nd</sup> Street, and S. Broadway. The Project Site totals approximately 160,578 square feet of lot area or approximately 3.6 acres. The proposed rehabilitated buildings, the Times, Plant, and Mirror Buildings, which have a total existing floor area of approximately 376,105 square feet, are located in the east sector of the block aligned with S. Spring Street, with frontages on W. 1st Street and W. 2<sup>nd</sup> Street. New development, consisting of the 37-story "North Tower" and 53story "South Tower", would be constructed in the west sector of the block, which is aligned with S. Broadway with frontages on W. 1st Street and W. 2nd Street. The existing Executive Building at the corner of W. 1st Street and S. Broadway and the parking structure at the corner of W. 2nd Street and S. Broadway would be demolished to allow for the development of the Project towers. The North and South Towers, which would be constructed above a five-story parking podium (Podium), would contain a total of approximately 1,127 residential units, approximately 34,572 square feet of commercial floor area, and a combined floor area of approximately 1,135,803 square feet. The Podium would be an above-ground structure with street front new retail development on the first floor and four levels of above-grade parking, which forms the base for the residential towers. The space below the Podium would contain an additional nine levels of subterranean parking. Overall, including the existing buildings to remain that total approximately 376,105 square feet, the Project would comprise approximately 1,511,908 square feet of floor area, resulting in a 9.42 FAR. An open-to-the sky pedestrian paseo (Paseo) leading from W. 1st Street to W. 2<sup>nd</sup> Street would bisect the block between the new towers and the rehabilitated Times, Plant, and Mirror Buildings, and would provide a visual connection to First and Broadway Civic Center Park, Ground level retail uses would be located along the base of the Podium facing W. 1st Street, S. Broadway, and W. 2nd Street, and the Paseo.

Project Floor Area numbers throughout this section are calculated in accordance with Los Angeles Municipal Code Section 12.03, unless otherwise noted.

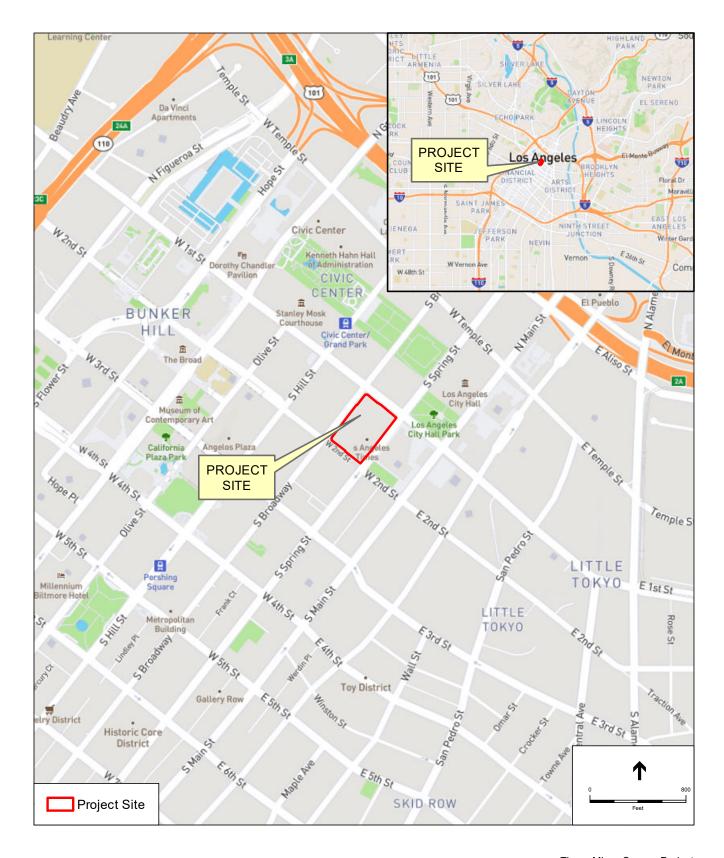
### B. Project Location and Surrounding Uses

The Project Site, bounded by W. 1<sup>st</sup> Street, S. Spring Street, W. 2<sup>nd</sup> Street, and S. Broadway, is located within the northern portion of the City of Los Angeles (City) Central City Community Plan Center City/Historic Core district, which extends from W. 1<sup>st</sup> Street to W. 11<sup>th</sup> Street, between Los Angeles and Hill Streets. As discussed in the Central City Community Plan, the Historic Core, which is centered on S. Spring Street and S. Broadway, forms the spine through Downtown that links the Financial District and Bunker Hill to the west, South Park and the Convention Center to the south, the South Markets to the southeast, and Little Tokyo and the Arts District to the east.<sup>2</sup> Downtown is characterized by a concentration of government-related uses, high- and mid-rise office buildings, residential buildings, hotels, retail uses, museums, and cultural districts, including the Arts and Markets districts. The Historic Core/Center City contains a concentration of historically and architecturally significant buildings, including the iconic City Hall, Walt Disney Concert Hall, and the historic Times, Plant and Mirror Buildings, which are components of the Project. The general vicinity and relationship of the Project Site to surrounding streets is illustrated in Figure A-1, Regional and Project Vicinity Map. Surrounding land uses are shown in Figure A-2, Aerial View of the Project Site and the Surrounding Uses.

#### 1. Land Uses to the North

Land uses to the north of W. 1<sup>st</sup> Street consist of the Los Angeles Civic Center, and Grand Park, a 16-acre park extending from City Hall to the south of N. Spring Street to the Dorothy Chandler Pavilion (Los Angeles Music Center) to the north of Grand Avenue. Immediately to the north of the Project Site is the 1.96-acre First and Broadway Civic Center Park, a public park currently under development and anticipated for completion in 2019. Adjoining the south side of Grand Park along the E. 1<sup>st</sup> Street frontage are the seven-story Los Angeles County Law Library, the 10-story Los Angeles County Stanley Mosk Courthouse, and the 10-story Kenneth Hahn Hall of Administration. The 20-story Clara Shortridge Folz Criminal Justice Center adjoins the north side of Grand Park directly north of the Project Site. The recently rehabilitated Los Angeles County Hall of Justice is located just to the north of the Criminal Justice Center. City Hall is located just to the northeast of the Project Site and the United States Courthouse is located just to the north of City Hall. The Hollywood Freeway (US-101) is located immediately north of the group of government buildings. Los Angeles Union Station, the region's major transit hub, is located just to the north of the US-101 Freeway.

City of Los Angeles Department of Planning, Central City Community Plan, Figure 1, Downtown Neighborhoods and Districts.

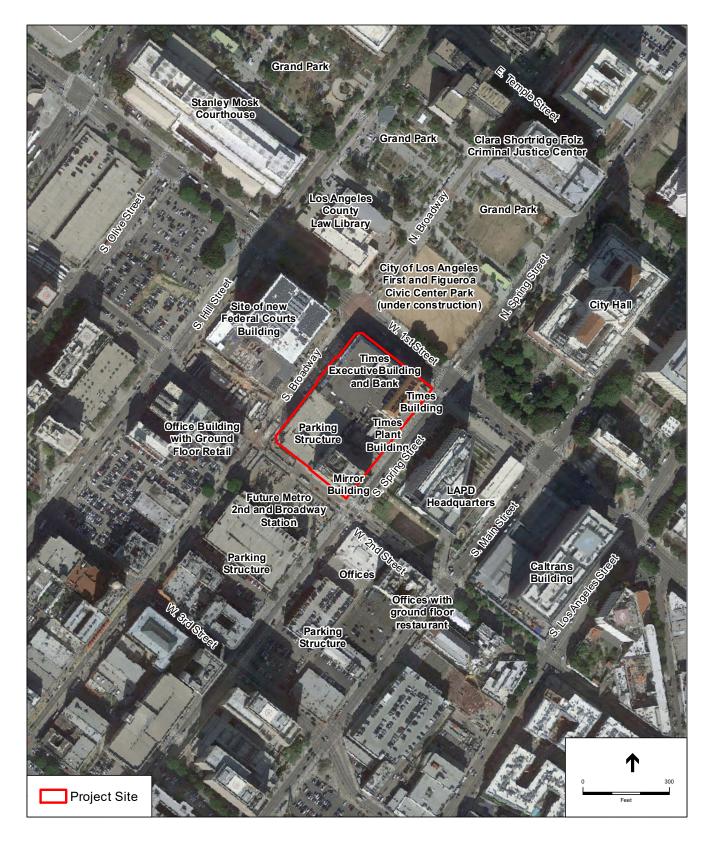


SOURCE: Open Street Map, 2016.

Times Mirror Square Project

Figure A-1
Regional and Project Vicinity Map





SOURCE: Google Maps, 2016 (Aerial).

Times Mirror Square Project

Figure A-2
Aerial View of the Project Site and the Surrounding Uses



#### Land Uses to the East

The 10-story Los Angeles Police Department (LAPD) Headquarters Building, which replaced Parker Center as the LAPD headquarters in October 2009, occupies the block bounded by S. Spring Street, E. 1<sup>st</sup> Street, S. Main Street, and E. 2nd Street, immediately to the east of the Project Site. The approximately 29-story Los Angeles City Hall is located diagonally across S. Spring Street and W. 1<sup>st</sup> Street from the Project Site. The LAPD Headquarters Building is oriented toward City Hall and is characterized by 75-foot setbacks on three sides. The LAPD Headquarters Building's deep setbacks accommodate a main plaza along E. 1<sup>st</sup> Street. In addition, the deep setback on the south of the Headquarters Building supports a one-acre park along E. 2<sup>nd</sup> Street. The park is landscaped open space edged with planters and benches. City Hall Park is located directly across E. 1<sup>st</sup> Street from the LAPD Headquarters Building's main plaza, at the south side of City Hall. City Hall Park is also aligned across N. Spring Street with the First and Broadway Civic Center Park (under construction), just to the north of N. Spring Street.

Public parks and plazas are also associated with City Hall along N. Main and N. Los Angeles Streets, and include Los Angeles Civic Center Mall. The existing Grand Park, the underconstruction Civic Center Park, public plazas and parks at the LAPD Headquarters Building and City Hall will contribute to a growing, inviting pedestrian environment for the area's employees and residents. Land uses to the east of the LAPD Headquarters building include the State of California Caltrans Building, occupying the block bounded by S. Main Street, E. 1<sup>st</sup> Street, S. Los Angeles Street, and E. 2<sup>nd</sup> Street. The approximately 21-story Double Tree Hotel is located to the south of the Caltrans Building, south of S. Los Angeles Street. At this point, Los Angeles Street forms the north edge of the City's Little Tokyo Community, which, with the Arts District, is located farther to the east of the Project Site. The Little Tokyo Community features plazas and paseos that further enhance pedestrian activity.

#### 3. Land Uses to the South

Low- and mid-rise office buildings, enclosed parking structures, and surface parking lots are the predominant land uses to the south of the Project Site. A surface parking lot and a 7-level enclosed parking structure are currently located directly across W. 2<sup>nd</sup> Street from the Project Site. The site was selected for Metro's proposed 2<sup>nd</sup> and Broadway Subway Station, one of three subway stations making up the Regional Connector Transit Project. Construction for the Regional Connector Transit Project at the 2<sup>nd</sup> Street and Broadway Station is currently underway. Completion of the entire Regional Connector Transit Project is anticipated in May 2021. A current development proposal for the subway station site includes demolition of the existing parking structure for the construction of a 30-story mixed-use building. The building would integrate the subway station and provide ground level retail uses. Diagonally across W. 2<sup>nd</sup> Street and S. Spring Street from the Project Site (to the southeast) is a single-story office building, to the south of which is an approximately 6-level enclosed parking building. To the east of the singlestory office building is an older, 10-story residential building with ground level retail uses, including a restaurant and shops along E. 2<sup>nd</sup> Street and S. Spring Street. Directly to the east of the 10-story building, across S. Main Street is the former Cathedral of St. Vibiana. The building and its associated plaza are now owned by the City and used for public events, and the property also houses the Little Tokyo Branch Public Library.

#### 4. Land Uses to the West

The new 10-story Federal Courthouse, completed in October 2016, is located directly to the west of the Project Site in the block bounded by W. 1st Street, S. Broadway, W. 2nd Street, and S. Hill Street. The building rests on a podium structure, which provides a horizontal base relative to the rise along W. 1st Street. The podium structure and the rising topography of the site require broad staircases from S. Broadway and W. 1st Street to reach the building's entrance. The west frontage of the building is at grade with S. Hill Street. The building sits behind a deep setback from W. 2<sup>nd</sup> Street, which allows exposure of the building to natural sunlight. The Los Angeles County Law Library, which is adjacent to Grand Park, is located diagonally across W. 1<sup>st</sup> Street and S. Broadway from the Project Site. A modern, 10-story office building with ground floor retail uses is located diagonally across W. 2<sup>nd</sup> Street and S. Broadway from the Project Site. To the west of the Federal Courthouse, 2<sup>nd</sup> Street enters the 2<sup>nd</sup> Street tunnel, passing under Bunker Hill and emerging at S. Figueroa Street. The Bunker Hill District is located approximately one block west of the Project Site and is bounded by W. 1st Street on the north; S. Hill Street on the east, the Pasadena/Santa Monica Freeway (I-10) on the west; and W. 5<sup>th</sup> Street on the south. Bunker Hill includes a concentration of downtown high rise development, such as the Library Tower, the Wells Fargo Tower, and the California Plaza Towers.

### C. Existing Conditions

### 1. On-Site Conditions

The approximately 3.6-acre Project Site is currently occupied by five structurally distinct but internally connected buildings currently occupied by the Los Angeles Times offices, a bank, and other office uses. The buildings were constructed between the 1930s and 1970s and range from four to 10 stories in height. The buildings include the eight-story Times Building, the 4-story Plant Building, the 10-story Mirror Building, the six-story parking structure, and the six-story Executive Building. The Times Building, which occupies the northeast corner of the Project Site, was designed by architect Gordon B. Kaufmann in the P.W.A Moderne style and constructed in 1935. The building's Globe Lobby features 10-foot-high murals painted in 1934 by Hugo Ballin, who also painted the Griffith Observatory rotunda. The Times Building is also noted for the prominent clocks on its north- and south-facing towers. The Plant Building, which was originally constructed with two stories in 1935 and expanded to four stories between 1947 and 1948, is located along the mid-block of S. Spring Street and emulates the Times Building's P.W.A. Moderne architectural style. In 1948, architect Rowland H. Crawford designed the 10-story Mirror Building in the Late Moderne style to emulate the style of the Times Building. The Los Angeles Times continues some newspaper operations out of the Times, Plant, and Mirror Buildings, all three of which are listed in the California Register of Historical Resources.

In 1973, the Executive Building, a six-story glass and steel International Style building, was designed by the architectural firm William L. Pereira & Associates on the northwest corner of the block. Once constructed, this building became the corporate headquarters for the Times-Mirror Company. Pereira's Executive Building abuts the west wall of the Times Building. Bank of

America occupies the ground floor of the Executive Building. The locations of existing on-site buildings are illustrated in **Figure A-3**, *Existing On-Site Uses*.

Combined, the Times, Plant, Mirror, and Executive Buildings have a total floor area of approximately 559,863 square feet. This includes approximately 541,113 square feet of commercial office uses across the four existing buildings, an approximately 7,500 square-foot bank in the Executive Building, and an approximately 11,250 square-foot cafeteria in the Plant Building. Table A-1, *Existing Uses*, provides a breakdown of existing land uses by building on the Project Site.

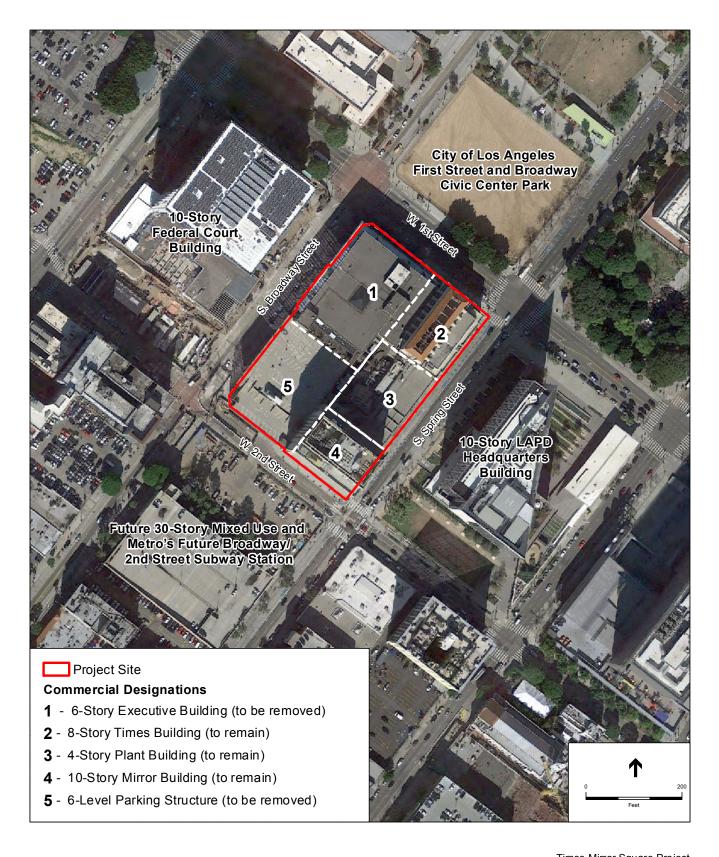
TABLE A-1
EXISTING LAND USES

Building	Use	Developed Floor Area (square feet)
Times	Office	116,113
Plant	Office	79,340
	Cafeteria	11,250
	Total Building Subtotal	90,590
Mirror	Office	169,402
Executive	Office	176,258
	Bank	7,500
	Total Building Subtotal	183,758
Total Floor Area		559,863

SOURCE: ESA PCR, 2017

The sidewalks adjoining the Project Site are landscaped with 29 uniform and young or mature California sycamore trees, although potted plants or planters are also provided along some sections of W. 1st Street, S. Spring Street, S. Broadway, and the corners of W. 1st Street and Broadway and W. 2nd Street and Broadway. Existing trees are discussed in detail in Subsection E.5, below.

Vehicle access to the existing parking structure is provided via a driveway on S. Broadway and a driveway on W. 2nd Street. These two driveways provide vehicle access for the Times, Executive, Plant, and Mirror Buildings, which all have interior connections to the parking structure. Driveways for interior shipping bays, waste collection, and other vehicle activity at the Mirror Building and Plant Building are located on W. 2nd Street (to the east of the previously described parking structure driveway), and on S. Spring Street. The loading dock driveway is on S. Broadway north of the parking structure driveway. Spring Street, a one-way, southbound roadway, contains a dedicated southbound bike lane. No parking is allowed along the curb lane, which is marked for bus transit and lined with benches and bus stops. Metered, on-street parking is provided along W. 1st Street and S. Broadway, both of which are two-way streets. Pedestrian light standards, consistent with the upright/double light theme throughout the Civic Center are provided on all four street frontages.



SOURCE: Google Maps, 2016 (Aerial), ESA PCR, 2017

Times Mirror Square Project
Figure A-3
Existing On Site Uses



The entire block was identified by SurveyLA, the citywide historic resources survey of Los Angeles. SurveyLA noted that the Times, Plant, and Mirror Buildings are listed in the California Register and evaluated the Executive Building as eligible for listing in the California Register and for designation as a Los Angeles Historic-Cultural Monument for its association with the growth and maturation of the Los Angeles Times as well as the career of Otis Chandler, who was the newspaper's publisher from 1960 to 1980.

### 2. Transit Access

Metro's Los Angeles Civic Center/Grand Park Station (Metro Station) is located approximately 750 feet to the northwest of the Project Site.

The Civic Center/Grand Park Station is a heavy rail subway station that serves two subway lines, the Red Line and Purple Line. The Red Line connects the Civic Center to Union Station, Hollywood, and North Hollywood. The Purple Line connects Union Station with the Wilshire/Western Station. The Red and Purple Lines provide further connection to three light rail transit lines serving downtown Los Angeles: the Blue and Expo Lines at the 7<sup>th</sup> Street/Metro Center Station and the Gold Line at Union Station.

The Project Site is also located adjacent to Metro's future 2<sup>nd</sup> Street and Broadway Station, one of the three subway stations that are part of Metro's Regional Connector Project.<sup>3</sup> The Connector Project, a 1.9-mile subway segment, will extend from the Metro Gold Line Little Tokyo/Arts District Station to the 7<sup>th</sup> Street/Metro Center Station in downtown Los Angeles, with transfers to Blue, Expo, Red and Purple Lines, bypassing Union Station. The 1.9-mile alignment will serve Little Tokyo, the Arts District, Civic Center, the Historic Core, Broadway, Grand Avenue, Bunker Hill, Flower Street and the Financial District. From the Metro Gold Line, passengers will be able to travel from Azusa to Long Beach and from East Los Angeles to Santa Monica without transferring lines. Forecasted opening of the 2<sup>nd</sup> Street and Broadway Station is 2021. New stations include the Historic Broadway Station at W. 2nd Street and Broadway, adjacent to the Project Site; the Little Tokyo/Arts District Station at E. 1st Street and Central Avenue; and the Grand Avenue Arts/Bunker Hills Station at 2nd Place and Hope Street.

Several bus lines serve the vicinity of S. Spring Street and W. 1<sup>st</sup> Street, including LADOT's Dash Downtown "D" line, which travels a circuit from the City Hall area throughout the Downtown; Metro's Rapid Line 770, which travels to Union Station and El Monte to the east; Metro's Rapid Line 745, which travels between Downtown and Metro's Harbor Freeway Station; Metro's Rapid Line 733, which travels from the Civic Center to Santa Monica; and Metro's Rapid Line 728, which travels between Union Station and Century City. In addition, numerous local lines are located in the Project vicinity, including Metro's Bus Lines 2, 4, 10, 28, 81, 83, 90, 91, 94, and 302, which run northbound along Broadway and Lines 30, 33, 40, 45, 68, 83, 84, 92, and 330, which run southbound along Spring Street.

Los Angeles Metro, Regional Connector Transit Project, https://www.metro.net/projects/connector/. Accessed January 20, 2017.

The Project Site is also well located to allow pedestrian access to numerous county, state, and federal buildings in the Civic Center. The Project Site has direct access to Grand Park, which provides landscaped pedestrian pathways between City Hall, the Los Angeles Music Center, and other uses along Grand Avenue. It is also located a few blocks from Bunker Hill to the west, the City's Financial Center to the southwest, Little Tokyo and the Arts District to the east; and Union Station and Olvera Street to the north. Thousands of jobs within walking distance are represented by the surrounding combination of office towers, the Arts District, and the Civic Center, which constitutes the heaviest concentration of government employment outside of Washington D.C.<sup>4</sup> The Project Site is also served by dedicated bike lanes in southbound Spring Street and northbound Main Street.

#### 3. Circulation

The Project Site is bounded by W. 1<sup>st</sup> Street, S. Spring Street, W. 2<sup>nd</sup> Street, and S. Broadway. These four streets are part of the Downtown Los Angeles grid, and even for those streets extending beyond the City center, the heaviest traffic loads are in the vicinity of the Civic Center. In the Project area, W. 1<sup>st</sup> Street is a designated Modified Boulevard II in the City of Los Angeles Mobility Plan 2035, with a required right-of-way of 110 feet. To the west of the I-110 Freeway, W. 1<sup>st</sup> Street merges with W. 2<sup>nd</sup> Street to form Beverly Boulevard. To the east, E. 1<sup>st</sup> Street ends at Atlantic Boulevard in the City of Monterey Park. In the Project area, W. 1<sup>st</sup> Street's required half right-of-way would be 55 feet and comprise a 37-foot roadway and 18-foot sidewalk. In addition, the Downtown Design Guide requires an additional 6-foot private easement from the sidewalk public right-of-way.

S. Spring Street, which adjoins the Project Site to the east, is a designated Modified Avenue II and is required to have a right-of-way of 80 feet. To the south, S. Spring Street merges with S. Main Street in the vicinity of S. 9<sup>th</sup> Street. South Main Street continues south to the City of Carson. To the north, N. Spring Street merges with Caesar Chavez Avenue to the north of the US-101 Freeway. South Spring Street's required half right-of-way in the Project Area would be 40 feet, and would comprise a 26-foot roadway and 14-foot sidewalk. In the Project area, S. Spring Street operates as a one-way, southbound highway, with a dedicated bike lane.

Adjoining the Project Site to the south, 2<sup>nd</sup> Street is a designated Modified Avenue III and is required to have a right-of-way of 74 feet. To the west at Hill Street, W. 2<sup>nd</sup> Street passes under the 2<sup>nd</sup> Street tunnel below Bunker Hill, emerging in the vicinity of Figueroa Street. To the east, E. 2<sup>nd</sup> Street terminates prior to the railyards and the Los Angeles River. In the Project area, W. 2<sup>nd</sup> Street's half right-of-way would be 37 feet, and would comprise a 26-foot roadway and 14-foot sidewalk.

Broadway, adjoining the Project Site to the west, is a designated Modified Avenue II and is required to have a right-of-way of 80 feet in the Project area. To the south, S. Broadway follows the Harbor Freeway (I-110) to the approximate vicinity of the San Diego Freeway (I-405), where

<sup>4</sup> LA Metro, 2nd St./ Broadway Station, https://www.metro.net/projects/connector/2nd-stbroadway-station/. Accessed January 23, 2017.

is merges with Main Street. To the north, N. Broadway terminates in the community of Lincoln Heights. In the Project area, S. Broadway's half right-of-way would be 40 feet and would comprise a 28-foot roadway and 12-foot sidewalk. In addition, the Downtown Design Guide requires an additional 5-foot private easement from the sidewalk public right-of-way.

### D. Planning and Zoning

### 1. Central City Community Plan

The Project Site is located within the Central City Community Plan area and is designated as Regional Center Commercial. The General Plan Framework designates the entire Central City area as a Downtown Center. Other Planning efforts described in the Central City Community Plan are the Downtown Strategic Plan, the Los Angeles Civic Center Shared Facilities and Management Plan, and Angel's Walk. The Downtown Strategic Plan recognizes the need to significantly increase the residential presence in the Central City community.<sup>5</sup> Angel's Walk is a plan to link transit and pedestrian districts of historic Downtown and ties public investment in bus and rail transit to urban design improvements that make the City attractive to pedestrians.<sup>6</sup> Los Angeles Civic Center Shared Facilities and Management Plan proposes a plan that would induce both economic and environmental benefits by defining the boundaries of the Civic Center as the distance an average person can walk in 10 minutes. Beginning at City Hall, the Angel's Walk area encompasses the Project site Little Tokyo, El Pueblo de Los Angeles, Union Station, the Music Center, Bunker Hill, and Pershing Square.<sup>7</sup> Primary issues presented in the Central City Community Plan are the need to increase housing for all incomes, particularly middle income households; the lack of sufficient housing investment; and the lack of neighborhood businesses to support residential uses.8 Community Plan Objectives 1-2 and 1-3 are to increase the range of housing choices available to Downtown employees and residents and to foster residential development which can accommodate a full range of incomes.

### 2. Zoning

The Project Site is zoned Commercial (C2-4D-SN), which permits general commercial and multifamily residential uses. The 4D Height District establishes a Floor Area Ratio (FAR) of 6.0:1, but does not specifically limit building heights.

The SN designation indicates a Signage Supplemental Use, in this case the Historic Broadway Supplemental Sign Use District, which applies to S. Broadway between W. 1<sup>st</sup> Street and W. 12<sup>th</sup> Street, regulates signage that cannot otherwise be provided for in the underlying C2 zone. The Supplemental Sign Use District allows signage programs that complement and protect the character-defining features of historic

<sup>5</sup> City of Los Angeles Department of Planning, Central City Community Plan, page I-12

<sup>&</sup>lt;sup>6</sup> City of Los Angeles Department of Planning, Op. Cit., page I-13.

Op. Cit, Angels' Walk Pedestrian Plan, page I-13.

<sup>&</sup>lt;sup>8</sup> Op. Cit, page I-14.

The Historic Broadway Sign Supplemental Use District was adopted by City Council, January 20, 2016, under ZI No. 2457.

buildings, encourage new infill investment on Broadway on vacant and underutilized sites, support strong pedestrian activity, reduce blight along the corridor, encourage economic development, and encourage the revitalization of the Broadway Theater and Entertainment District.

The Project Site is also located within the Central City TFAR area, Greater Downtown Housing Incentive Area, Downtown Adaptive Reuse Area, Downtown Design Guide Project area, and the Central City and Downtown parking districts.

The Downtown TFAR designation allows for the transfer of floor area rights from a donor site to increase FAR over the existing zoning designation. The Greater Downtown Housing Incentive Area was established to encourage new, economically diverse urban infill housing.

The Downtown Adaptive Reuse Area designation encourages the adaptation of an economically obsolete building for a more productive purpose through the provision of incentives and certain waivers. The Downtown Design Guide Project establishes context-sensitive street standards that emphasize walkability, sustainability and transit options, and urban design standards to reinforce the community character of Downtown. The Central City and Downtown Parking Districts designation establishes a ratio of parking for residential and commercial uses that reflects the area's greater access to multi-modal transit and lower per capita automobile use.

### 3. Transit Priority Area

City of Los Angeles Department of Planning, Zoning Information (ZI) File No. 2452 was developed in response to Senate Bill (SB) 743, to allow for transit priority areas (TPAs) and exemptions to aesthetics and parking evaluations within TPAs pursuant to CEQA. Specifically, Section 21099 (d)(1) of the Public Resources Code (PRC) states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if (1) the project is a residential, mixed-use residential, or employment center project, and (2) the project is located on an infill site within a transit priority area. PRC Section 21099 defines the criteria for an employment center, infill site, and TPAs. Specifically, "infill site" is defined as a location within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site adjoins an improved public right-of-way. "TPAs" are defined as areas within one-half mile of a major transit stop that is existing or planned. A "major transit stop" is defined as a site containing an existing rail transit station 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. Under ZI File No. 2452, a project shall be considered to be within a TPA if all parcels within the project have no more than 25 percent of their area farther than one-half mile from the major transit stop. The "Citywide Transit Priority Areas" map contained in ZI File No. 2452 illustrates overlapping TPAs within Downtown Los Angeles.

Because the Project comprises mixed uses including residential uses, and the Project Site is a previously developed "infill" site located within 750 feet of Metro's Los Angeles Civic Center/Grand Park Station and directly across W. 2<sup>nd</sup> Street from Metro's 2<sup>nd</sup> Street and Broadway Station (currently under construction), the Project meets the criteria of SB 743 and ZI File No. 2542. As discussed in ZI File No. 2542, visual resources, aesthetic character, shade and

shadow, light and glare, and scenic vistas, and any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact, unless evaluation is required under other land use regulations of the Municipal Code.

### 4. Other Applicable Plans

#### Los Angeles Enterprise Zone

The Project Site is designated as an Enterprise Zone/Employment and Economic Incentive Program Area (EZ), shown in the City's Zoning Information and Map Access System (ZIMAS) as the Los Angeles State Enterprise Zone. <sup>10</sup> EZs are geographic areas designated by City Council Resolution, with approval by the California Department of Commerce under either the Enterprise Zone Act Program or Employment and Economic Incentive Act Program. Under this designation, federal, state, and city governments may provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services. As listed in LAMC Section, 12.21-A,4(x)(3), the EZ program allows for lower parking ratios for commercial office, business, retail, restaurant, bar and related uses, trade schools, or research and development buildings.

#### **Greater Downtown Housing Incentive Area**

The Project Site is located within the Greater Downtown Housing Incentive Area, which under Los Angeles Zoning Information File ZI No. 2385 (Ordinance No. 179,076) modifies several Municipal Code requirements for projects within the Greater Downtown. Adopted in 2007, the purpose of the Greater Downtown Housing Incentive Area is to provide incentives to produce housing in the designated area. Within the boundaries of the Greater Downtown Housing Incentive Area, the maximum unit per lot area was eliminated and density is unlimited (within the relevant FAR). No yard requirements apply except as required by the Urban Design Standards and Guidelines, prepared by the Community Redevelopment Agency and approved by the City Planning Commission. The Buildable Area is the considered the same as Lot Area and the percentages of private and common open space were eliminated. However, the total per unit open space requirement shall still be provided.

### **Downtown Streetcar Project Area**

The Downtown Streetcar Project Area consists of the construction and operation of streetcar service in downtown Los Angeles, along a 3.8-mile one-way loop. The Project alignment route would begin at 1st Street and Broadway and proceed south, turn west on 11th Street, north on Figueroa, and east on 7th Street, north on Hill Street, back to its beginning at 1st Street. Potential inclusion of a Grand Avenue extension would also provide a two-way alignment spur. All applicants seeking Planning clearance are required to obtain approval from the Bureau of Engineering Streetcar Division to ensure that all construction activity, utility installation and/or

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City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS), Parcel Profile Report: 202-220 W. 1st Street. Generated January 25, 2017.

utility relocation in the public right-of-way shall not conflict with the Downtown Streetcar Project.<sup>11</sup>

#### **Downtown Design Guide**

The Downtown Design Guide document is intended to provide guidance for creating a livable and more sustainable Downtown community. The Design Guide places an emphasis on walkability and the making of great streets, districts and neighborhoods. More specifically, the Design Guide focuses on the relationship of buildings to the street, including sidewalk treatment, character of the building as it adjoins the sidewalk, and connections to transit. The Design Guide notes that these key features provide high quality development at a human scale, when paired with the details of a project in the first 30-40 vertical feet. Specific topics that the Design Guide addresses include: Sustainable design; Sidewalks and setbacks; Ground floor treatment; Parking and access; Massing and street wall; On-site open space; Architectural detail; Streetscape improvements; Signage, Public art and; Civic and cultural life. As shown on Figure 1-1, of the Design Guide, the Project Site is located within the Civic Center South District.

#### Redevelopment Area

It is noted that the Project Site is adjacent to the City Center Redevelopment Project area, which incorporates the Historic Downtown, South Park, and City Markets subareas. The City Center Redevelopment Project area is located to the south of 2nd Street, just to the south of the Project Site. As such, it is not applicable to the Project Site.

## E. Description of Proposed Project

## 1. Design and Architecture

The Project layout and relative location of Project components are illustrated in **Figure A-4**, *Project Site Plan*. As shown in Figure A-4, the Times, Plant, and Mirror Buildings, which would be preserved, are located along the S. Spring Street frontage. The Executive Building and parking structure would be demolished, and the new North Tower and South Tower would replace these structures along the S. Broadway frontage. The proposed Paseo would separate the existing Times, Plant, and Mirror Buildings from the new towers and intersect the Project Site between the W. 1<sup>st</sup> Street and W. 2<sup>nd</sup> Street sidewalks. **Figure A-5**, *Simulated Aerial View of the Project from the Northeast*, provides a conceptual drawing and approximate scale with respect to the Project's Downtown Los Angeles setting. As shown in Figure A-5, the Times Building would regain its original visual character along W. 1<sup>st</sup> Street by removing the Executive Building, which currently abuts and extends over the Times Building's west façade. The fifth and sixth stories of the Times Building have been altered by rooftop additions dating from the 1940s and 1960s. These alterations would be reversed, with the intent of restoring the original 1935 design. As shown in **Figure A-6**, *Level 6 – Office Terrace*, the mechanical equipment that currently occupies the rooftop of the four-story Plant Building would be relocated and replaced with an office

City of Los Angeles, Zoning Information File ZI-2450, Downtown Streetcar Project, http://zimas.lacity.org/documents/zoneinfo/ZI2450.pdf.

terrace. The office terrace would provide conference/presentation and break space for office employees of the Times/Plant/Mirror Buildings and would not be available to the general public. Views of the office terrace would be visible from surrounding structures higher than four stories, including, but not limited to, the proposed Project to the west, north, and south, City Hall to the northeast, Los Angeles Police Department Headquarters to the east, and the future 232 W. 2nd Street Project to the south. **Figures A-7** through **A-10** show the historic, existing, and future views of the Project Site from 1<sup>st</sup> Street, 2<sup>nd</sup> Street, and Broadway. **Figures A-11** through **A-13** show the existing ground level view at 1<sup>st</sup> Street and the future views of the ground level at 1<sup>st</sup> Street and the Paseo. **Figures A-14** and **A-15** show the existing and future views at Spring Street.

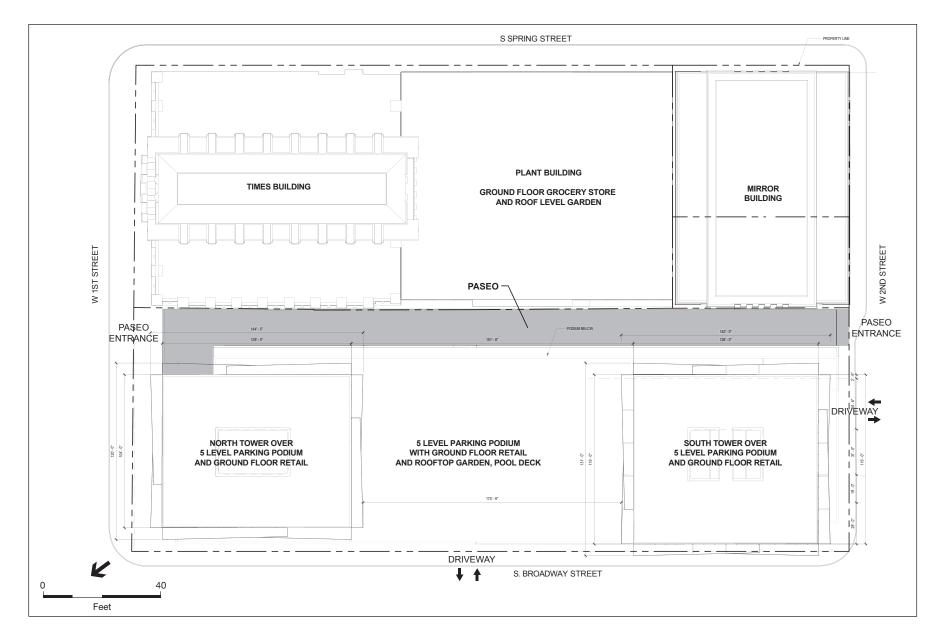
A key design objective of the Project is to provide a full retail and service base at street level along all four edges of the Podium, including 1<sup>st</sup> Street, Broadway, 2<sup>nd</sup> Street, and the Paseo. The four frontages would provide high-quality, interconnected streetscape environments. The design includes articulated retail facades, the use of cantilevered canopies to define retail entries, and landscaping that buffers the scale and height of the new buildings and enhances the pedestrian experience.

The intersection of 1<sup>st</sup> Street and Broadway provides a gateway to the Civic Center. The design responds by creating an activity-centered place for pedestrians at this corner incorporating retail, shops and restaurants, and the portal entrance to the Paseo. The Paseo, with clearly defined landscaped entrances at 1<sup>st</sup> and 2<sup>nd</sup> Streets, provides a pedestrian corridor connecting the Project Site with adjacent areas. With landscaping, benches, pavement treatment and adjacent retail shops, the tree-lined Paseo would facilitate pedestrian use and provide aesthetic and visual relief. Open Space and Landscaping for the Project is discussed in detail in Section 5 of this document.

Key design strategies of the Project include:

- Rehabilitating and reusing the Times, Plant, and Mirror Buildings to add new useful life to the buildings and to benefit the Civic Center and the City through historic preservation;
- Providing architecture and design for new construction that is cohesive with and complements the architecture of the rehabilitated Times, Mirror, and Plant Buildings;
- Strengthening existing and new pedestrian connections and streetscapes through the use of wider sidewalks, landscape, street trees, street furniture, lighting and signage;
- Providing pedestrians a safe, accessible, comfortable and interesting walking space, that includes open space, landscaping and public art;
- Incorporating sidewalk-oriented uses and an urban Paseo to enhance the pedestrian experience, provide pedestrian interaction, and provide pedestrian gathering places and destination points at the corners of the Project Site;
- Using street lighting and architectural lighting to enhance building features, safety and the pedestrian experience.

The Moderne style reflected in the architecture of the Times and Mirror Buildings incorporates the principles of geometric shapes characterized by smooth lines, streamlined forms, strong compositional gestures, horizontal lines, vertical and punched expressions, mass and volume; a base, body and top formal expression, as well as symmetrical and asymmetrical gestures.



SOURCE: AC Martin Partners, Inc, 2017

Times Mirror Square Project

Figure A-4
Project Site Plan



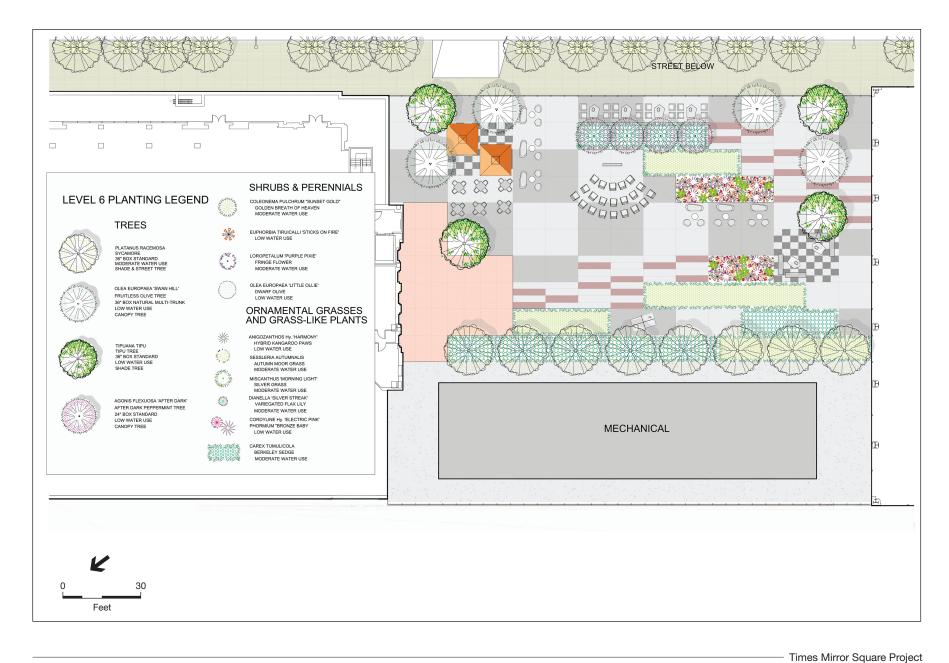


Times Mirror Square Project

Figure A-5
Simulated Aerial View from the Northeast

SOURCE: AC Martin Partners, Inc, 2017



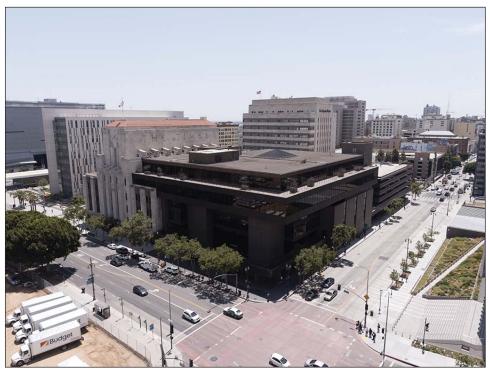


SOURCE: AC Martin Partners, Inc, 2017

Figure A-6 Level 6 – Office Terrace







PHOTOGRAPH 1. Intersection of 1st Street and Broadway Avenue facing Southeast towards the Executive Building.



PHOTOGRAPH 2. Intersection of 2nd Street and Broadway Avenue facing Northeast towards the Parking Structure.

Times Mirror Square Project **Figure A-8** 





SOURCE: AC Martin, 2017

Times Mirror Square Project

Figure A-9
Future Rendering - Intersection of 1st Street and
Broadway Avenue facing Southeast



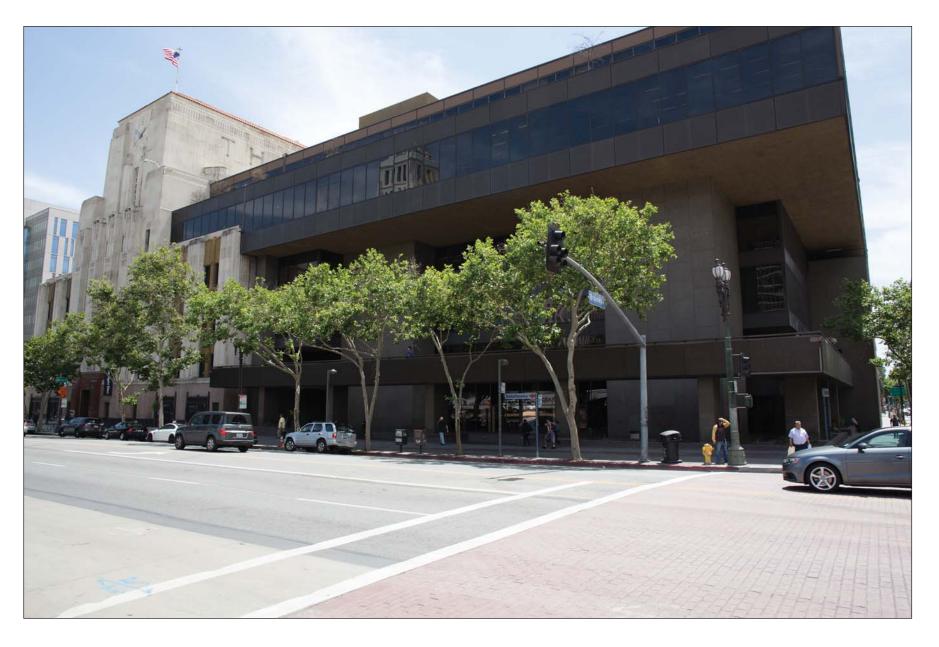


Times Mirror Square Project



SOURCE: AC Martin, 2017





Times Mirror Square Project
Figure A-11
Existing View – 1st Street Ground Level

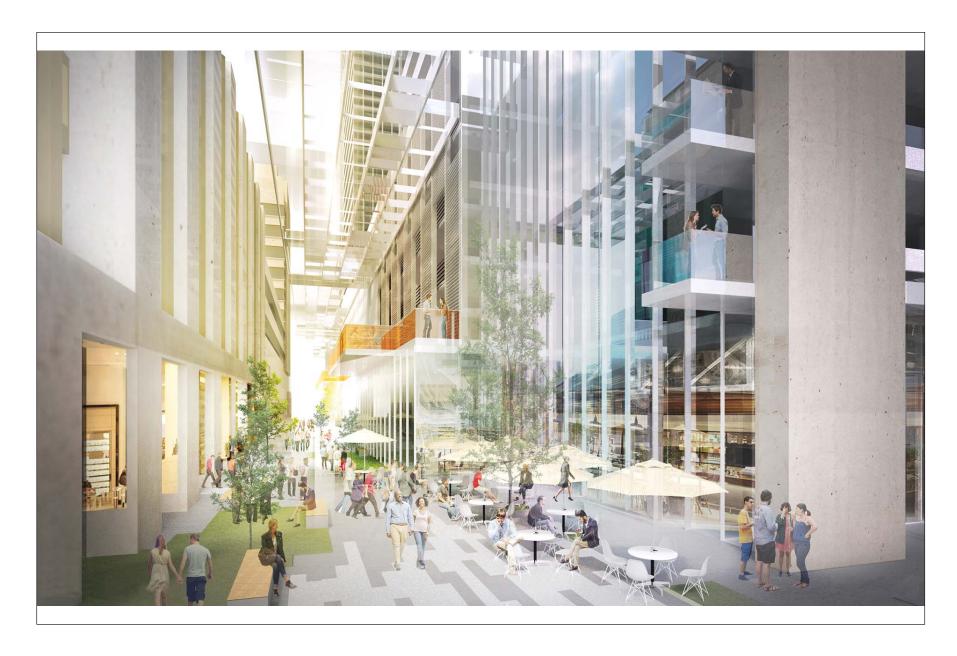


Times Mirror Square Project

Figure A-12
Future Rendering – 1st Street Ground Level







SOURCE: AC Martin, 2017

Times Mirror Square Project
Figure A-13
Future Rendering – 1st Street Paseo





Times Mirror Square Project

Figure A-14
Existing View - Southwest facing Plant and
Mirror Buildings on Spring Street





Times Mirror Square Project



SOURCE: AC Martin, 2017



The architecture and design of proposed new development is intended to complement to the Moderne style of the existing buildings. The scale of the Podium supporting the new residential towers would be articulated with a contemporary base, body, and rooftop. The Podium would incorporate solid and transparent glazed materials and strong compositional features, punched and vertical articulation, and mass, to complement the architecture of the existing Times, Mirror, and Plant Buildings, which are to be rehabilitated. The solid portions of the Podium base would incorporate similar materials, textures, and color values to the Mirror Building to visually link the entire development.

The residential towers, which would exhibit prominent window elements, would rise from the Podium and incorporate external balconies for residential units on all four sides of each tower. The architecture of the towers would incorporate horizontal and vertical features that would complement the Moderne architectural style of the existing Times, Plant, and Mirror Buildings.

### 2. Times, Plant, and Mirror Buildings Rehabilitation

Under the Project, the Times Building, Plant Building, and Mirror Building would be rehabilitated and adaptively re-used. The three buildings, which have a total floor area of approximately 376,105 square feet, currently include office and cafeteria uses, and are aligned along S. Spring Street, with frontages along both W. 1<sup>st</sup> Street and W. 2<sup>nd</sup> Street. Under the Project, there would be approximately 285,088 square feet of commercial office uses, approximately 41,017 square feet of commercial restaurant uses, and an approximately 50,000 square-foot grocery store. Although the total floor area of 376,105 square feet and the proportional mix of commercial uses would not change, the Project would allow flexibility in how the uses are allocated among the three existing buildings. The three historic buildings would be separated from the west side of the block by the Paseo.

After the Executive Building and parking structure are removed, the lower floors of the western facades of the Times, Plant, and Mirror Buildings would be compatible with the historic character of the three existing buildings, but distinguishable as new.

The interiors of all three historic buildings have been heavily altered over time. The two original and architecturally distinctive interior spaces, the lobbies of the Times Building and Mirror Building, would be preserved. The upper floors contain little if any historic fabric, as it was removed as a result of past structural improvements and office modernizations. The upper floors would be reconfigured for office tenants, if required. The exteriors of all three buildings would be cleaned and repaired as necessary.

#### **Times Building**

The rehabilitation of the Times Building would involve reconstruction of the upper floors of the west elevation, which abuts the Executive Building. The reconstruction would be based upon the original plans of the Times Building as well as extant physical evidence. Likewise, the rooftop addition on the fourth story of the east elevation would be removed and the elevation restored to its original character. Thus, the original massing and stepped-down form from the clock tower would be reinstated. The Times Building would continue to be used as an office building.

#### **Plant Building**

On the ground level, the original loading docks would be reopened for the proposed grocery store or other commercial use<sup>12</sup> with access to both S. Spring Street and the Paseo. The upper stories would be rehabilitated and used for offices. As shown in Figure A-6, the existing mechanical equipment on the roof of the Plant Building would be relocated and reconfigured for an office terrace, which would be used by office tenants. This area would provide conference/presentation areas and eating/break areas and would not be accessible to the general public. The western façade of the building would remain unchanged.

#### Mirror Building

The Mirror Building would be rehabilitated and continue to be used as an office building. The exterior of the building would be cleaned and repaired as necessary. As discussed above, the lobby area would be preserved. The west side of the building, which currently provides connections to the existing parking structure, would be altered by the demolition of the parking structure. This side of the building would be evaluated and reconstructed for compatibility with the historic character of the three existing buildings, but distinguishable as new.

Project elevations illustrating the exterior of the Times, Plant, and Mirror Buildings are available in Section 4, Figures A-16 through A-19, of this chapter. **Table A-2**, *Proposed Uses within the Times*, *Plant, and Mirror Buildings*, shows the proposed land uses and developed floor area for the rehabilitated buildings.

TABLE A-2
PROPOSED USES WITHIN THE TIMES, PLANT, AND MIRROR BUILDINGS

Land Use	Developed Floor Area (sf)
Office	285,088 sf
Ground-floor Restaurant	18,817 sf
Upper-floor Restaurant	22,200 sf
Grocery Store	50,000 sf
Proposed Adaptive Reuse Floor Area	376,105 sf
SOURCE: ESA PCR, 2017	

### 3. North and South Towers

The Project's North Tower and South Tower mixed-use components would be constructed on the western side of the Project Site in the area currently occupied by the 6-story Executive Building at the corner of W. 1<sup>st</sup> Street and S. Broadway and the 6-story parking structure at the corner of W. 2<sup>nd</sup> Street and S. Broadway. The North Tower would be constructed near W. 1<sup>st</sup> Street and S. Broadway, and the South Tower would be constructed near W. 2<sup>nd</sup> Street and S. Broadway. The Towers would be constructed over a 5-story Podium and, from street grade, the North Tower

As described, although the total floor area of approximately 376,105 square feet and the proportional mix of commercial uses would not change, the Project would allow flexibility in how the uses are allocated among the three existing buildings.

would rise 37 stories or approximately 495 feet above grade. The South Tower would rise 53 stories or approximately 665 feet above grade.

**Table A-3**, *Proposed New Development*, below, summarizes the number of proposed residential units, open space, and retail floor area associated with the North and South Towers. As shown in Table A-1, the North Tower would contain 450 residential units and the South Tower would contain 677 residential units, for a total of 1,127 residential units. Total residential floor area within the two towers would be approximately 1,071,692 square feet. With the addition of open space amenities, lounges, loading areas, and retail uses, total new construction would amount to 1,135,803 square feet.

TABLE A-3
PROPOSED NEW DEVELOPMENT<sup>a</sup>

	North Tower	South Tower	Total Residential Units
North and South Towers Uses			
Residential Uses			
Studio	90 Units	0	90 Units
I Bedroom	166 Units	380 Units	546 Units
1 Bedroom + Den	60 Units	100 Units	160 Units
2 Bedroom	132 Units	192 Units	324 Units
3 Bedroom	0 Units	4 Units	4 Units
Penthouse	2 Units	1 Unit	3 Units
Total Residential Units	450 Units	677 Units	1,127 Units
Floor Area			
Total Residential Units Floor Area			1,071,692 SF
Amenities Floor Area			23,956 SF
Lounges			2,997 SF
Loading			2,586 SF
Retail			34,572 SF
<b>Total New Construction</b>			1,135,803 SF
Outdoor Common Space and other Comm			_
Space Amenities	Area Type		Area
LAMC Required Open Space			125,325 SF 15,708 SF
Level 1		Paseo/Plaza <sup>a</sup>	
Level 1	Lounge – North Tower		1,270 SF
Level 1	Lounge – South Tower		1,755 SF
Level 6	Amenity – North Tower		13,331 SF
Level 6	Amenity – South Tower		12,287 SF
Level 6	Residential Terrace		28,777 SF
Subtotal Common Open Space			73,128 SF
Private Balconies			56,349 SF
Total Project Open Space			129,477 SF
Other Uses			
Parking	Parking		
Bicycle Spaces			1,274 spaces

<sup>&</sup>lt;sup>a</sup> Available for public use

SOURCE: AC Martin, Plans for Onni Times Square, 2017

The towers would include approximately 34,572 square feet of retail uses, which would be located at ground level and oriented to W. 1<sup>st</sup> Street, S. Broadway, and W. 2<sup>nd</sup> Street, while also fronting the Paseo. The Paseo would be constructed along the east edge of Tower A and Tower B, passing from sidewalk to sidewalk between W. 1<sup>st</sup> Street to W. 2<sup>nd</sup> Street. The open-to-the-sky Paseo would accommodate pedestrian and shopper access through the block, as well as provide an open vista toward Civic Center Park and the First and Broadway Civic Center Park, which is under construction to the north. The Paseo would also serve to physically and visually separate the towers from the original Times, Plant, and Mirror Buildings. Project elevations illustrating the exteriors of the North and South Towers are provided in Section 4, in Figures A-15 through A-18, of this chapter.

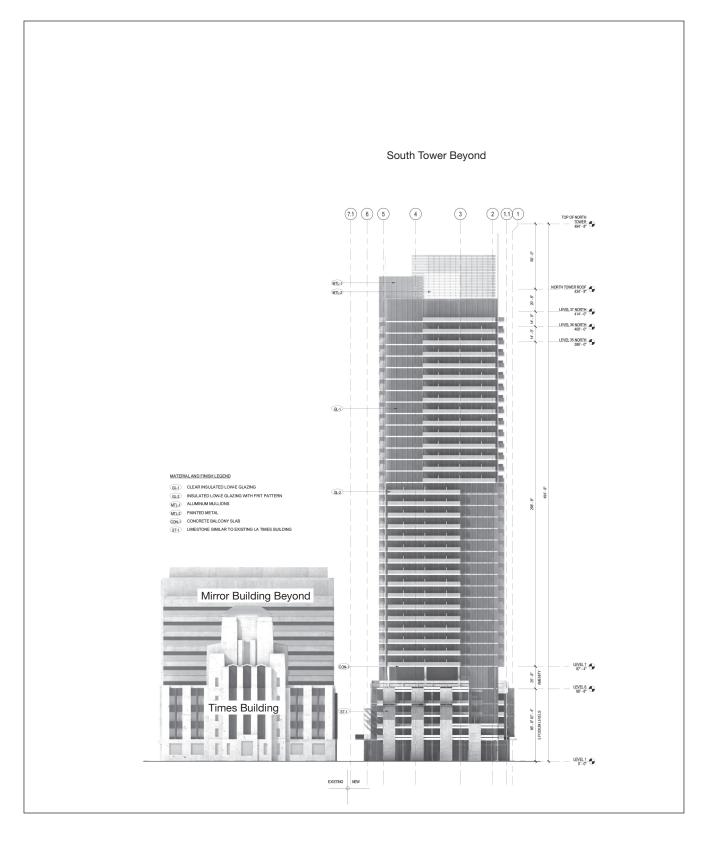
As also shown in Table A-3, open space amenities available to residents of the North and South Towers include an approximately 28,777-square-foot residential terrace (Residential Terrace) on the rooftop of the five-story Podium (Level 6). The Residential Terrace is represented in Figure A-22, *Level 6 – Residential Terrace*, below. The Residential Terrace, which is located on the rooftop of the Podium between the North and South Towers, would be open to sky and provide approximately 7,700 square feet of landscaping, a pool deck, a dog run, cabanas, steam room and sauna, and other amenities such as dining tables and fire-side seating. As shown in Table A-1, the Project would provide other amenities at the 6<sup>th</sup> floor level, as well as ground-floor lounges in each of the tower buildings. These amenity areas are expected to include a gym, club rooms, meeting rooms, film screening room, private dining, and potentially other common areas to serve residents.

Approximately 73,128 square feet of common open space, including the approximately 15,708-square-foot Paseo, would be provided as part of the North and South Towers component. Of the common open space, only the Paseo is available for public access. The remaining 57,420 square feet are provided as common use for the Project's residents. With the addition of approximately 56,349 square feet of private balconies, combined private and common open space would be approximately 129,477 square feet.

## 4. Project Elevations

Project elevations are provided in Figures A-16 through A-19. The elevations illustrate the relative scale of the Project and the relationship between the rehabilitation component (Times, Plant, and Mirror Buildings) and the North and South Towers. **Figure A-16**, *North Elevation as Viewed from W. 1<sup>st</sup> Street*, illustrates the Project as it would be viewed from the north, including Grand Park and the City's Civic Center Park. In this elevation, the 37-story North Tower and the 8-story existing Times Building would appear in the foreground, while the upper stories of the 53-story South Tower would appear in the background. Similar to existing conditions, the 10-story Mirror Building would be visible behind the Times Building.

Because of the setback and open space afforded by Grand Park and Civic Center Park, broad views of the Project would be available from land uses to the north of Spring Street, including City Hall, civic buildings lining Civic Center Park, the Los Angeles Music Center, and uses to the north of the Hollywood Freeway.



Times Mirror Square Project

Figure A-16

North Elevation as Viewed from W. 1st Street

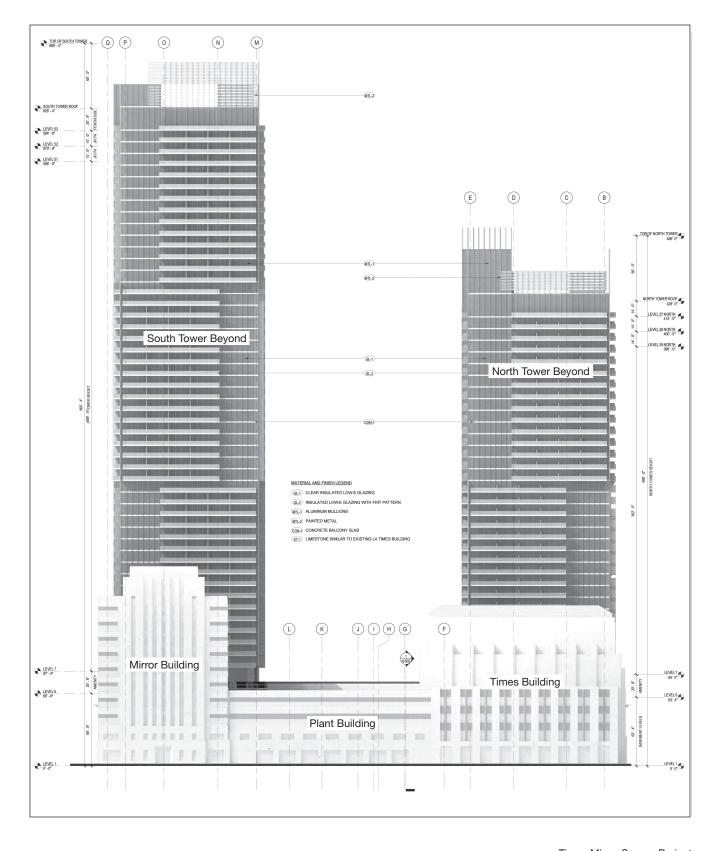


Figure A-16 also illustrates the architectural treatment of the North Tower, including the strong horizontal plane at the base of the building and horizontal features that define the vertical walls of the towers. This feature complements the distinctive vertical lines of the Times Building and balances the horizontal planes that define the Mirror Building. The Paseo running between W. 1<sup>st</sup> Street and W. 2<sup>nd</sup> Street would separate the Times Building from the North Tower and allow for the rehabilitation of the Times Building's west façade as viewed from the north.

**Figure A-17**, *East Elevation as Viewed from S. Spring Street*, illustrates the appearance of the Project as viewed from the area to the east of S. Spring Street. The 10-story LAPD Headquarters Building would block most near, direct west-facing views of the Project. However, the Project's east elevation would be visible from the E. 1<sup>st</sup> Street and E. 2<sup>nd</sup> Street corridors, from City Hall Park, and from LAPD Headquarters' south plaza. In more distant views from the east, the Project would be a component of the City's skyline, with high-rise buildings in Bunker Hill and the City's Financial District forming the background. Because Bunker Hill and the Financial District are topographically higher than the Project Site, the Project would not obscure the City's existing high-rise profile. As shown in Figure A-17, the strong horizontal planes of the North Tower and South Tower would complement the distinctive horizontal planes of the lower Plant Building separating the two towers and the vertical planes of the Times Building and Mirror Building. The roof of the Plant Building in the foreground would be used as a garden seating area.

**Figure A-18**, *South Elevation as Viewed from W. 2<sup>nd</sup> Street*, illustrates the appearance of the Project as viewed from the area to the south. This elevation also illustrates the relative height differences between the 10-story Mirror Building and 53-story South Tower. In this elevation, the 53-story South Tower would obscure the 37-story North Tower. A proposed 30-story building just to the south of W. 2<sup>nd</sup> Street would block direct views of the Project Site from the south; however, the Project would be visible from the Metro's proposed 2<sup>nd</sup> Street/Broadway Station, planned just to the south across W. 2<sup>nd</sup> Street. It would also be highly visible through the S. Spring Street and S. Broadway corridors. The strong horizontal architectural component of the South Tower would complement the horizontal component of the Mirror Building. The proposed Paseo between W. 2<sup>nd</sup> Street and W. 1<sup>st</sup> Street would create a visual and physical separation between the South Tower and the Mirror Building.

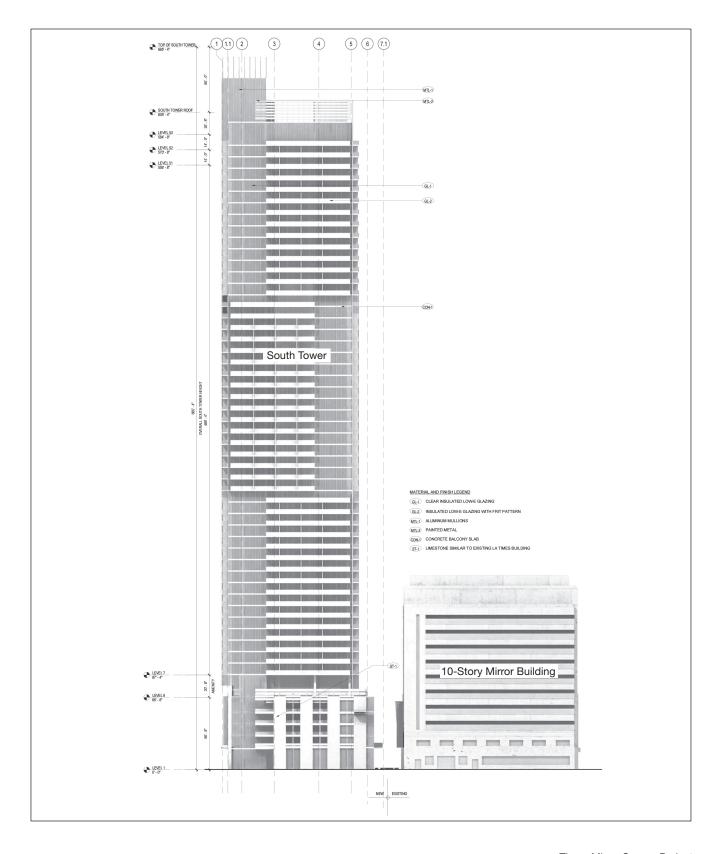
**Figure A-19**, *West Elevation as Viewed from S. Broadway*, illustrates the appearance of the Project as viewed from the area to the west. The new 10-story Federal Court Building directly to the west, which is located at a relatively higher ground elevation, would block direct views of the Project Site from the west. However, the Project's South Tower would be visible through the W. 1<sup>st</sup> Street corridor and the North Tower would be visible through the W. 2<sup>nd</sup> Street corridor. The base of the two towers provide a strong horizontal component, which forms a continuous retail street front between W. 1<sup>st</sup> Street and W. 2<sup>nd</sup> Street. Ground-level retail uses would be located in the 5-level Podium, which occupies the length of the block between W. 1<sup>st</sup> Street and W. 2<sup>nd</sup> Street. The roof of the Podium would provide space for an open garden, pool deck, and other recreational amenities for tower residents. The separation between the towers created by the lower 5-level Podium and the 4-story Plant Building in the background would allow light and visual relief from the mass of the North and South Towers, as viewed from the Federal Court Building and other uses to the west.



Times Mirror Square Project

Figure A-17
East Elevation as Viewed from S. Spring Street



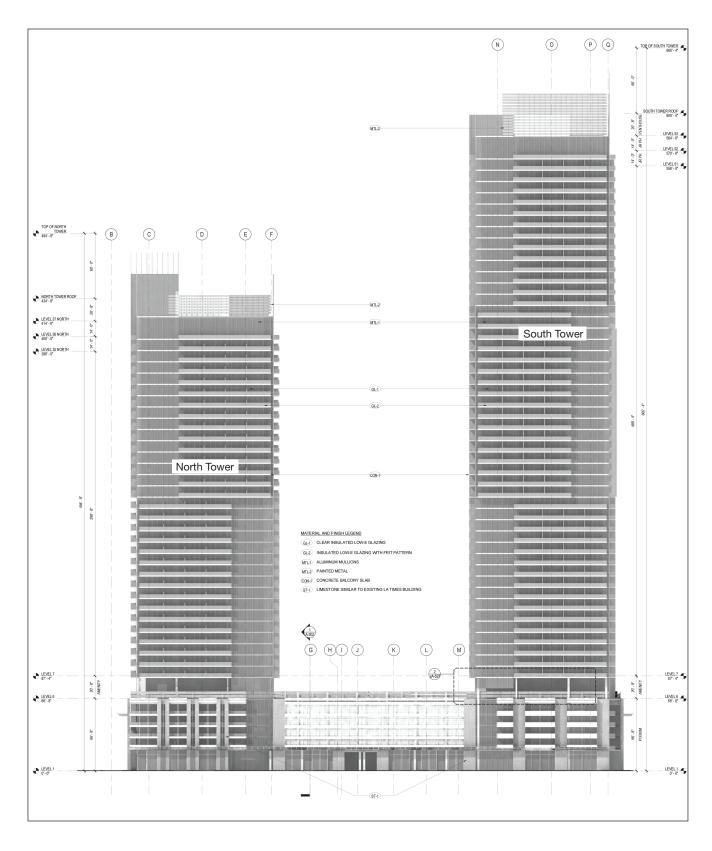


Times Mirror Square Project

Figure A-18

South Elevation as Viewed from W. 2nd Street





Times Mirror Square Project

Figure A-19 West Elevation as Viewed from S. Broadway



## 5. Open Space and Landscaping

Figures A-6, A-20, A-21, and A-22 illustrate proposed landscaping and open space associated with the Proposed Project. **Figure A-20**, *Ground Level Overall Landscape Plan*, shows that the overall landscape plan at the ground level. There are 29 existing California Sycamores, nine trees along W. 1<sup>st</sup> Street, 7 trees along S. Broadway, and 13 trees along Spring Street, and all would remain in place under the Project. The Project would add an additional four California Sycamores along W. 1<sup>st</sup> Street to create a double row near the corner of W. 1<sup>st</sup> Street and S. Broadway. In addition, the Project would add six California Sycamores along S. Broadway to fill in the existing trees on S. Broadway and create a continuous line of California Sycamores along the street edge. The Project would also add three additional California Sycamores along S. Spring Street and four California Sycamores along W. 2nd Street. The Project would plant two trees, Sweet Shade (*Hymenosporum flavum*), at the corner of S. Broadway and W. 2<sup>nd</sup> Street. The Sweet Shade tree is generally smaller than the California Sycamore but produces clusters of fragrant yellow flowers. Groups of Sweet Shade trees, a total of approximately twenty-five in all, would be planted along the pedestrian Paseo, which bisects the Project Site passing from W. 1st Street to W. 2nd Street.

As shown in Figure A-20 and **Figure A-21**, *Paseo and Outdoor Cafe*, the Paseo would be lined with an outdoor café, food court, and retail uses. Decorative pavement would be installed along W. 2<sup>nd</sup> Street and W. 1<sup>st</sup> Street, leading to the Paseo entrance, which would also be similarly paved. Bench planters, public art, bicycle parking, and trees would be located throughout the Paseo, as well as at the corners of W. Broadway and W. 2<sup>nd</sup> Street. The Paseo would also allow views to Civic Center Park immediately to the north of W. 1<sup>st</sup> Street. With the proposed landscaping, benches, public art, bicycle parking, pavement treatment, and adjacent retail shops, the tree-lined Paseo would facilitate pedestrian use and provide aesthetic and visual relief.

**Figure A-22**, *Level 6 – Residential Terrace*, illustrates open space amenities at the roof level of the five-story Podium. This area, which would be used by residents of the North Tower and South Tower, is represented by the setback between the North Tower and the South Tower, shown in Figure A-19, above. The base of the North Tower would be set back from the street edge of the Podium. The setback area would be accessible as a walkway and feature a line of approximately twenty laurel trees along the base of the North Tower, from the pool deck toward W. 1<sup>st</sup> Street.

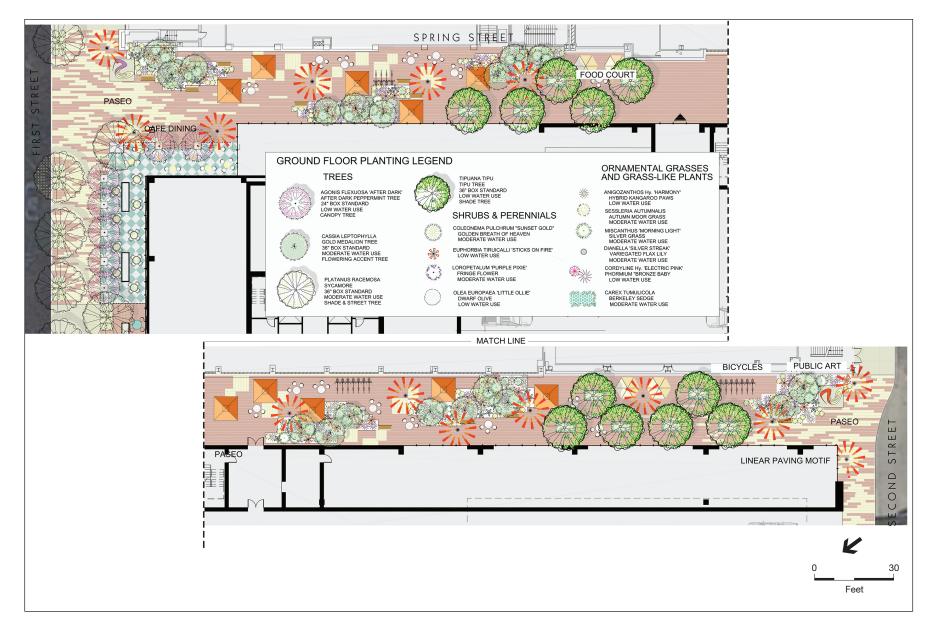
Several fruitless olive trees would be planted behind the laurels at the pool deck. As also shown in Figure A-22, approximately twelve Golden Italian Cypress leading from the row of laurels (to the left of the laurels in the Level 6 - Residential Terrace) would be planted along the edge of the rooftop. To the north of the rooftop dog run, these would be backed by a group of After Dark Peppermint trees. A similar grouping would also be planted along the east edge of the Podium, overlooking the ground-level Paseo. Other groups of trees, as shown in Figure A-22, would be planted throughout the Podium rooftop. The trees on the Podium roof would enhance to the visual character of the Project as viewed from S. Broadway and the Paseo. Reductions in water demand for irrigation would be achieved through drought-tolerant/California native plant species selection and artificial turf, landscape contouring to minimize precipitation runoff, irrigation system efficiency, alternative water supplies (e.g., stormwater retention for use in landscaping), smart irrigation systems (e.g., weather-based controls), and water-saving pool equipment.



Times Mirror Square Project

Figure A-20 Ground Level Overall Landscape Plan

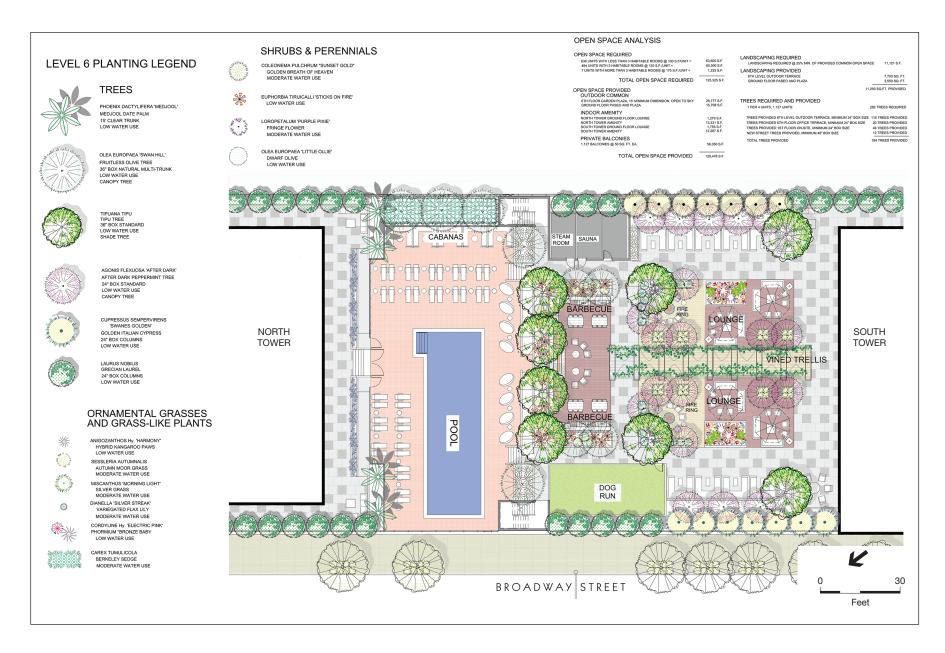




Times Mirror Square Project

Figure A-21
Paseo and Outdoor Cafe





Times Mirror Square Project



### 6. Parking

**Table A-4**, *Parking Requirements*, presents the LAMC parking requirement and the proposed parking for each of the Project's land uses, including the commercial uses and grocery store associated with the rehabilitated Times, Plant, and Mirror Buildings, and residential and retail uses within the North Tower and South Tower. The residential component consists of 90 studio units, 546 one-bedroom units, 484 two-bedroom or one-bedroom-with-den units, 4 three-bedroom units, and 3 penthouse units for a total of 1,127 units. As shown in Table A-4, the LAMC would require 1,250 vehicle parking spaces for the Project's residential component. The Project's total 410,677 square feet of commercial floor area would require approximately 411 parking spaces. Overall parking required for residential and commercial uses pursuant to the LAMC would total 1,661 parking spaces.

TABLE A-4
PARKING REQUIREMENTS

Use	Parking/Unit	No. of Units or Area	Required Parking
Residential			
Residential Parking 3 Habitable Rooms or Less	1.00	636 Units	636
Residential Parking More than 3 Habitable Rooms	1.25	491 Units	614
Subtotal Residential Parking Required			1,250
Residential Short and Long Term Bicycle Parking			1,240
Commercial			
Required Retail Parking New Building	1/1,000 SF	34,572 SF	35
Required Restaurant Parking Rehabilitated Building	1/1,000 SF	41,017 SF	41
Required Grocery Parking	1/1,000 SF	50,000 SF	50
Required Office Parking	1/1,000 SF	285,088 SF	285
Subtotal Commercial Parking Required	1/1,000 SF	410,677 SF	411
Commercial Short and Long Term Bicycle Parking			34
Total LAMC Required Parking			1,661

SOURCE: AC Martin Plans for Onni Times Square, 2017.

As shown in **Table A-5**, *Parking Provided*, the Project would provide 1,240 bicycle parking spaces for the residential uses and 34 bicycle parking spaces for the commercial uses. The Project is designed for approximately 1,744 vehicle parking spaces in the five-level above-ground Podium and nine-level subterranean parking structure. The entrance and exit to the residential and retail parking would be located on S. Broadway and W. 2nd Street. There would also be a loading dock entrance and exit on Broadway, north of the residential/retail driveway.

TABLE A-5
PARKING PROVIDED

Location	Residential	Retail/Office	Retail/Grocery	Potential Spaces (Max.
Podium Level 5	75			75
Podium Level 4	75			75
Podium Level 3	59		16	75
Podium Level 2			75	75
Mezzanine			34	34
Podium Level 1				0
Subterranean Level 1		156		156
Subterranean Level 2		156		156
Subterranean Level 3	62	94		156
Subterranean Level 4	156			156
Subterranean Level 5	156			156
Subterranean Level 6	156			156
Subterranean Level 7	156			156
Subterranean Level 8	156			156
Subterranean Level 9	162			162
Location	Residential	Retail/Office	Retail/Grocery	Spaces
Total Provided Vehicle Parking	1,213	406	125	1,744
Total Provided Bicycle Parking				1,274

SOURCE: AC Martin Plans for Onni Times Square, 2017.

### 7. Sustainability

The new development associated with the Project would be designed to achieve the equivalent of the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Silver Certification level for new buildings. The Project would be designed to meet the California Green Building Standards (CALGreen) Code, as adopted and amended by the City of Los Angeles, through the incorporation of green building techniques and other sustainability features, including those within the City of Los Angeles Green Building Code, where applicable. Some of the Project's key design features that would contribute to energy efficiencies include the use of glass/window areas for ventilation and daylight accessibility, use of recyclable materials for flooring and demisable partitions in limited amounts, green walls in some areas, low albedo (high reflectivity) color paving to reduce heat island effect, conduit for solar panels installed on roof deck areas pursuant to code requirements, and landscaping of courtyards and roof decks. Other building features would include such items as installation of energy-efficient lighting, heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants; use of materials and finishes that emit low quantities of volatile organic compounds (VOCs); use of high efficiency fixtures and appliances; water conservation features;

and dedicated on-site recycling area. The Project's inclusion of bicycle parking, as discussed above, would encourage the use of alternative modes of transportation.

The Project would reduce outdoor potable water use by a minimum of 20 percent compared to baseline water consumption. Reductions would be achieved through drought-tolerant/California native plant species selection and artificial turf, landscape contouring to minimize precipitation runoff, irrigation system efficiency, alternative water supplies (e.g., stormwater retention for use in landscaping), smart irrigation systems (e.g., weather-based controls), and water-saving pool equipment.

In addition, to encourage carpooling and the use of electric vehicles by Project residents and visitors, the Project would designate a minimum of eight percent on on-site parking for carpool and/or alternative-fueled vehicles and shall pre-wire, or install conduit and panel capacity for, electric vehicle charging stations up to a maximum of 20 percent of onsite parking spaces.

### CEQA Guidelines Appendix F

In accordance with CEQA Guidelines Appendix F, the EIR will provide further information as to energy conservation, energy implications, and the energy-consuming equipment and processes that would be used during Project construction and operation. Design features of the Project, energy supplies that would serve the Project and total estimated daily vehicle trips that would be generated by the Project will also be analyzed. In addition, while development of the Project would not be anticipated to cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the CEQA Guidelines, further analysis of the Project's consistency with Appendix F will also be provided in the EIR.

## 8. Lighting and Signage

New signage would be used for identification of ground level retail and restaurant businesses, building identification, and way finding. No off-site advertising signage is proposed. Street level commercial and restaurant signage would be similar to other signage along the street frontages in the area and, with regard to Broadway, would be consistent with the Historic Broadway Supplemental Sign Use District. The proposed buildings would include accent lighting to complement the building architecture. All lighting would be designed and located to be compatible with the architecture and landscaping of the Project, and would be directed on-site and shielded as appropriate to avoid light spill over onto adjacent properties. Pedestrian areas, including the Paseo, would be well lit for security. Existing light standards along all four street frontages, which are consistent with fixtures used throughout the Civic Center, would be retained. Lighting and signage would be developed in compliance with applicable LAMC requirements.

### Security Features

The Project would incorporate a 24-hour/seven-day security program to ensure the safety of its residents and visitors. The Project would be designed in consideration of the City's "Design Out Crime" initiative to provide a project design that incorporates strategies from Crime Prevention through Environmental Design (CPTED).

Design strategies within the project design would include, but not limited to, the following:

- Secure access points would be limited and located in areas of high visibilities;
- Hallways and corridors would be straight forward with no dark corners, as possible;
- Outdoor areas would be exposed to windows and allow for natural surveillance;
- Clear transitional zones would be provided between public, semi-public and private spaces;
- Access key cards and cameras would be used; and
- Interior and exterior spaces would be well lit with proper signage to direct the flow of people and decrease opportunities for crime.

In addition, the following security measures would be implemented by the Project:

- Installing and utilizing a 24-hour security camera network throughout the underground and above-grade parking structure; the elevators; the common and amenity spaces; the lobby areas; and the rooftop and ground level outdoor open spaces.
- Maintaining all security camera footage for at least 30 days, and providing such footage to LAPD as needed.
- Controlling access to all building elevators, residences, and resident-only common areas through an electronic key fob specific to each user.
- Training employees on appropriate security policies for the Project's buildings. Duties of the staff would include, but would not be limited to, assisting residents and visitors with site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and monitoring the property.
- Providing a 24-hour/seven-day security program for the Paseo.
- Access to commercial uses would be unrestricted during business hours, with public access discontinued after businesses have closed.

### 10. Anticipated Construction Schedule and Activities

The Project would be constructed in one phase, with initiation of construction expected in 2019, followed by an approximate four-year construction period ending with buildout and occupancy in 2023. The Project would require approximately 364,000 cubic yards of soil export and no fill would be required on the Project Site. Construction would be carried out pursuant to a construction management plan subject to review and approval by the City. The plan would include such items as street closure and detour information (if applicable), haul routes, and a staging plan, and would specify actions to reduce effects on the surrounding community. Construction hours would occur in accordance with LAMC requirements, which prohibit construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday. The Project Site would be fenced during construction for security purposes with gate-controlled access.

### 11. FAR, Setbacks and Density

The Project's new development (approximately 1,135,803 square feet) combined with existing floor area to remain (376,105 square feet) would result in approximately 1,511,908 square feet of floor area. The overall FAR (floor area divided by land area) within the approximately 160,578 square-foot Project Site would be approximately 9.42:1. The Project Site is designated as Regional Center in the Central City Community Plan Land Use Map. Under Footnote 3 of the map, which is applicable to the Project Site's Regional Center designation, it indicates an FAR of 6:1 for the respective zoning (D) designation, "except with Transfer of Floor Area (TFAR) up to 10:1 or 13:1, respectively." <sup>13</sup>

The Project would provide 1,127 residential units, which on the approximately 160,578-square-foot site would represent one dwelling unit per 142.48 square feet of lot area, in exceedance of the City's highest density R5 zone (1 unit per 200 square feet of lot area). However, the location of the Project Site within the Greater Downtown Housing Incentive Area allows exemption from several Municipal Code sections, including density requirements. Within the boundaries of the Greater Downtown Housing Incentive Area, the maximum unit per lot area was eliminated and density is unlimited (within the relevant FAR).

No yard requirements apply except as required by the Urban Design Standards and Guidelines. Under the Downtown Design Guide, retail streets in the Project area (Civic Center South) from back of the required sidewalk, no setback is required adjacent to ground-floor retail, a project may be set back within the specified range of 0-5 feet.<sup>14</sup>

## F. Necessary Approvals

It is anticipated that approvals required for the Project would include, but may not be limited to, the following:

- 1. Transfer of Floor Area Rights (TFAR) greater than 50,000 square feet of floor area for the transfer of 548,440 square feet of floor area from the Los Angeles Convention Center (Donor Site) to the Project Site (Receiver Site) (LAMC Sec. 14.5.6-B).
- 2. Vesting Conditional Use Permit to permit floor averaging within a unified development (LAMC Sec. 12.24-W,19).
- 3. Master Conditional Use Permit (MCUB) to permit the on-site and off-site sale and consumption of alcoholic beverages within the Project's commercial retail spaces (LAMC Sec. 12.24-W,1).
- 4. Vesting Tentative Tract Map for the merger and re-subdivision of the Project Site for condominium purposes (LAMC Sec. 17.15). The Applicant is requesting to provide parking

City of Los Angeles Department of Planning, Central City Community Plan, General Plan Land Use Map (as of July 7, 2009) Footnote 3,

<sup>&</sup>lt;sup>14</sup> City of Los Angeles, Downtown Design Guide, Table 3-1.

per LAMC requirements in lieu of the parking requirements under the Advisory Agency's Parking Policy for Condominiums.

- 5. Construction permits, including building, grading, excavation, foundation, and associated permits.
- 6. Haul Route Permit, as may be required.
- 7. Other approvals as needed.

### ATTACHMENT B

## **Explanation of Checklist Determinations**

### I. Aesthetics

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "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 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." 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. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

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>1</sup>

PRC Section 21099 applies to the Project. Therefore, the Project is exempt from aesthetic impacts. The analysis in this initial study (or in the EIR, if any aesthetic impact discussion is included), is for **informational purposes only** and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this initial study (or the EIR) is included to discuss what aesthetic impacts would occur from the Project if PRC

City of Los Angeles Department of City Planning, Zoning Information (ZI) File No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Available at: http://zimas.lacity.org/

Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this initial study (or the EIR) shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

Would the project:

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

**No Impact.** The Project Site is located within a highly urbanized area of Downtown Los Angeles in the Civic Center/Historic Core District. Visual resources in the Project vicinity include the Downtown Los Angeles skyline to the west and southwest, the historic Los Angeles City Hall, the recently rehabilitated and historic County Hall of Justice, and other historic and architecturally notable buildings in the area. While the Project's paseo would provide a view corridor toward Grand Park to the north, because the Project would introduce new buildings and increase overall density on the Project Site, it could have an effect on scenic vistas from some locations in the Project vicinity. However, the Project is a mixed-use residential and employment center project that would be located on an infill site within a Transit Priority Area.

Pursuant to SB 743 and ZI 2452, the Project would result in no impact to scenic vistas.

Notwithstanding the above and the exemption of the Project from aesthetic impacts under SB 743, the EIR will include a discussion of the Project's impacts under the City thresholds for informational purposes only. The impact conclusion for aesthetics is no impact.

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

**No Impact.** The Project Site is not located within a City- or State-designated scenic highway or associated view corridor.<sup>2-3</sup> However, the Project Site and the surrounding Civic Center/Historic Core District contains historic and locally recognized desirable buildings and other features, such Grand Park. The introduction of new high-rise buildings may indirectly affect some of these scenic resources in the Civic Center/Historic Core and adjacent districts. However, the Project is a mixed-use residential and employment center project that would be located on an infill site within a Transit Priority Area.

Pursuant to SB 743 and ZI 2452, the Project would result in no impact to scenic resources.

Notwithstanding the above and the exemption of the Project from aesthetic impacts under SB 743, the EIR will include a discussion of the Project's impacts under the City thresholds for informational purposes only. The impact conclusion for aesthetics is no impact.

City of Los Angeles Department of City Planning, Mobility Plan 2035, Map A-5, https://planning.lacity.org/documents/policy/mobilityplnmemo.pdf. Accessed May 9, 2017.

State of California, Department of Transportation, Officially Designated State Scenic Highways, http://www.dot.ca.gov/hq/LandArch/16\_livability/scenic\_highways. Accessed May 9, 2017

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

**No Impact.** The Project would rehabilitate the existing Times Building, Plant Building, and Mirror Building, while demolishing and replacing the Executive Building, a glass and steel building on the northwest corner of the block designed by modernist William Pereira. New buildings would include a 37-story, approximately 495-foot-high North Tower and a 53-story, approximately 665-foot-high South Tower. The Project would alter the existing urban visual character of the Project Site and its surroundings by increasing the height and density of on-site development. However, the Project is a mixed-use residential and employment center project that would be located on an infill site within a Transit Priority Area.

Pursuant to SB 743 and ZI 2452, the Project would result in no impact to visual character or quality.

Notwithstanding the above and the exemption of the Project from aesthetic impacts under SB 743, the EIR will include a discussion of the Project's impacts under the City thresholds for informational purposes only. The impact conclusion for aesthetics is no impact.

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

No Impact. The Project Site is located within a highly urbanized area of Downtown Los Angeles within the Civic Center/Historic Core, which is characterized by moderate to high ambient nighttime artificial light levels. At night, surrounding development typically generates moderate to high levels of exterior lighting for loading dock, security, parking, signage, and some architectural lighting. Street lights and the limited nighttime traffic on local streets also contribute to the light levels in the area. The Project would further contribute to ambient nighttime illumination as the Project's new architectural lighting, security lighting, interior and outdoor lighting from residential and retail areas, and any illuminated signage is expected to increase light levels over existing conditions. In addition, the Project would introduce new building surface materials to the Project Site with the potential to generate glare. However, the Project is a mixed-use residential and employment center project that would be located on an infill site within a Transit Priority Area.

Pursuant to SB 743 and ZI 2452, the Project would result in no impact to light and glare.

Notwithstanding the above and the exemption of the Project from aesthetic impacts under SB 743, the EIR will include a discussion of the Project's impacts under the City thresholds for informational purposes only. The impact conclusion for aesthetics is no impact.

Shading impacts are influenced by the height and bulk of a building or structure, the time of year, the duration of shading during the day, and the proximity of shade-sensitive land uses or receptors. No residential outdoor areas, which are typically shade-sensitive,<sup>4</sup> are currently

<sup>&</sup>lt;sup>4</sup> City of Los Angeles, L.A. CEQA Thresholds Guide (2006), page A.3-1.

adjacent to the Project Site. However, the Project vicinity is characterized by a number of shade-sensitive uses, including City Hall Park, Grand Park, the City's under-construction First and Broadway Civic Center Park, and the Caltrans Building's open space with seating. The new Federal Courthouse Building to the west relies heavily on natural light for daytime operation and may also be considered shade-sensitive.<sup>5</sup> Because the Project would increase the height of on-site development, it could have an impact on shade-sensitive uses. However, the Project is a mixed-use residential and employment center project that would be located on an infill site within a Transit Priority Area.

Pursuant to SB 743 and ZI 2452, the Project would result in no impact to shading.

Notwithstanding the above and the exemption of the Project from aesthetic impacts under SB 743, the EIR will include a discussion of the Project's impacts under the City thresholds for informational purposes only. The impact conclusion for aesthetics is no impact.

### II. Agricultural and Forestry Resources

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

*Would the project:* 

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

**No Impact.** The Project Site is located within the Civic Center/Historic Core of Downtown Los Angeles and is entirely developed with the several buildings including the Times Building, the Plant Building, the Executive Building, and a parking structure. No agricultural uses or related operations are present on the Project Site or in the surrounding highly urbanized area. Furthermore, the Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the

Skidmore, Owens, and Merrill, SOM's New L.A. Courthouse Needs Almost No Artificial Lighting During the Day (January 16, 2017), http://www.som.com/news/soms\_new\_la\_courthouse\_needs\_almost\_no\_artificial\_lighting\_during\_the\_day. Accessed January 24, 2017.

Farmland Mapping and Monitoring Program.<sup>6</sup> Since the Project would not convert farmland to non-agricultural uses, there would be no impact. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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

**No Impact.** The Project Site is designated as Regional Center Commercial in the Central City Community Plan, with a corresponding zone of C2-4D-SN, which permits general commercial and multi-family residential uses. The Project Site comprises a completely developed urban parcel. No agricultural zoning is present in the Project vicinity, and no nearby lands are enrolled under the Williamson Act.<sup>7</sup> As such, the Project would not conflict with existing zoning for agricultural uses or a Williamson Act contract, and there would be no impact. No further analysis of this topic in the EIR is required, and no mitigation measures are required.

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

**No Impact.** As discussed in the response to Checklist Question II.b, the Project Site is zoned C2-4D-SN, which permits general commercial and multi-family residential uses. The Project Site is currently entirely developed with five multi-story buildings. Furthermore, consistent with the urbanized area surrounding the Project Site, the larger Project vicinity comprises the Los Angeles Civic Center and other public facilities, and the Project Site is designated for Regional Center Commercial land uses. No forest land or land zoned for timberland production is present on the Project Site or in the surrounding area. As such, the Project would not conflict with existing zoning for forest land or timberland, and there would be no impact. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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

**No Impact.** The Project Site is entirely developed with the LA Times Building and related operations, office buildings, and a multi-story parking structure. No forest land exists on-site or in the Project vicinity. As such, the Project would not result in the loss of forest land or conversion of forest land to non-forest use, and there would be no impact. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland Map 2014, ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/los14.pdf. Accessed January 24, 2016.

California Department of Conservation, Division of Land Resource Protection, Los Angeles County Williamson Act Map FY 2015/2016, ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA\_15\_16\_WA.pdf. Accessed December 1, 2016.

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

**No Impact.** There are no agricultural uses or related operations on or near the Project Site, which is located in Downtown Los Angeles in the Civic Center/Historic Core District, a highly urbanized portion of the City. Therefore, the Project would not involve the conversion of farmland to other uses, either directly or indirectly. No impacts to agricultural land or uses would occur. No further analysis of this topic in the EIR is required and no mitigation measures are required.

### III. Air Quality

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

Would the project:

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

**Potentially Significant Impact.** The Project Site is located within the 6,600-square-mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD), together with the Southern California Association of Governments (SCAG), is responsible for formulating and implementing air pollution control strategies throughout the Basin. The current Air Quality Management Plan (AQMP) was adopted March 3, 2017 and outlines the air pollution control measures needed to meet Federal particulate matter (PM<sub>2.5</sub>) and ozone (O<sub>3</sub>) standards. The AQMP also proposes policies and measures currently contemplated by responsible agencies to achieve Federal standards for healthful air quality in the Basin that are under SCAQMD jurisdiction. In addition, the current AQMP addresses several Federal planning requirements and incorporates updated emissions inventories, ambient measurements, meteorological data, and air quality modeling tools from earlier AQMPs.

The Project would support and be consistent with several key policy directives set forth in the AQMP. For example, the Project would provide for new residential uses in the City's Civic Center/Historic Core, which is characterized by high employment density. The Project would also locate new development in proximity to existing public transit facilities, including LADOT's Downtown Dash, Metro's Civic Center Station, Metro's under-construction 2<sup>nd</sup> and Broadway Station, a range of Metro's Rapid Bus Lines and local bus lines. The Project Site is already served by existing roadway and utility infrastructure. Notwithstanding these attributes, the Project has the potential to increase the amount of traffic in the area, which would consequently generate operational air emissions that could affect implementation of the AQMP. Pollutant emissions resulting from construction of the Project would also have the potential to affect implementation of the AQMP. Therefore, the EIR will provide further analysis of potential impacts to implementation of the AQMP.

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

**Potentially Significant Impact.** The Project Site is located within the Basin, which is characterized by relatively poor air quality. According to the 2016 AQMP, the Air Basin is designated non-attainment for federal and State ozone standards, as well as the current PM<sub>2.5</sub> standards. The Los Angeles County portion of the Basin is also designated a nonattainment area for the federal lead standard on the basis of source-specific monitoring at two locations, as determined by U.S. EPA using 2007–2009 data. However, all other stations in the Basin, including the near-source monitoring in Los Angeles County, have remained below the lead NAAQS for the 2012 through 2015 period. SCAQMD is therefore requesting that U.S. EPA redesignate the Los Angeles County portion of the Basin as attainment for lead. The Project would result in increased air emissions associated with construction and operational traffic. Therefore, the EIR will provide further analysis of potential impacts associated with the Project's construction and operational air pollutant emissions, with the Air Quality analysis accounting for the most recent regulatory changes.

# c) Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, PM10, and PM2.5) under an applicable federal or state ambient air quality standard?

**Potentially Significant Impact.** As discussed in the response to Checklist Question III.b, the Project would result in increased air emissions from construction and operational traffic in the Basin, within an air quality management area currently in non-attainment of Federal and State air quality standards for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. As such, implementation of the Project could potentially contribute to cumulatively significant air quality impacts in combination with other existing and future emission sources in the Project area. Therefore, the EIR will provide further analysis of potential cumulative impacts associated with an increase in criteria pollutants.

## d) Expose sensitive receptors to substantial pollutant concentrations?

**Potentially Significant Impact.** The Project Site is located in the downtown area, which includes a high density, concentrated mix of uses, including residential and other sensitive uses in the Project vicinity. Construction activities and operation of the Project could increase air emissions above current levels. Therefore, the EIR will provide further analysis of potential impacts associated with the exposure of sensitive receptors to substantial pollutant concentrations.

# e) Create objectionable odors affecting a substantial number of people?

**Less Than Significant Impact.** Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. Odors are also associated with such uses as sewage treatment facilities and landfills. Activities and materials associated with Project construction would be typical of

construction projects of similar type and size. On-site trash receptacles would be enclosed within the subterranean parking structure or other interior spaces on Level 1, and properly maintained in a manner that promotes odor control. Any odors generated during construction of the Project would be localized and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by South Coast Air Quality Management District (SCAQMD) Rule 402. The Project proposes a mixed-use development that includes residential, office, retail (including grocery store), and restaurants that would not introduce any major odor-producing uses that would have the potential to affect a substantial number of people, such as uses associated with manufacturing, smelting, food packing, and other industrial uses. Odors associated with Project operation would be limited to those associated with on-site waste generation and disposal (e.g., trash cans, dumpsters) and occasional minor odors generated during food preparation activities. Waste would also be regularly collected and, because trash receptacles would be located within the Project's interior, any potential odors from on-site waste disposal would not affect surrounding land uses. Thus, Project operation is not expected to create objectionable odors and odor impacts would be less than significant. Therefore, impacts would be less than significant and no mitigation measures are required. No further analysis of this topic in the EIR is required.

### IV. Biological Resources

Would the project:

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

Less than Significant Impact with Mitigation Incorporated. The Project Site is entirely developed with five buildings and a parking structure and, as such is entirely impermeable. The Project Site has been operating as an urban use for decades. At present, the adjacent street rightsof-ways (ROWs) are planted with 29 ornamental, California Sycamore trees. Of these, 26 are considered to more than 3 inches in truck diameter. All 29 trees would remain under the Project. The Project would add an additional four California Sycamores along W. 1st Street to create a double row near the corner of W. 1st Street and S. Broadway. In addition, the Project would add 10 California Sycamores along S. Broadway Street to fill in the existing trees on S. Broadway and create a continuous line of California Sycamores along the street edge. The Project would also add three additional California Sycamores along S. Spring Street and four California Sycamores along W. 2<sup>nd</sup> Street. The Project would not remove any existing trees and would add trees and shrubs at the entrances to the Paseo and within the Paseo, which would increase ornamental plants and trees over existing conditions. Thus, the Project would not disturb any native or protected trees as defined by the Los Angeles Municipal Code (LAMC) Section 17.02 and impacts to street trees would be less than significant. In addition, the Project vicinity is highly urbanized and does not support habitat for candidate, sensitive, or special status plant species. Therefore, no impacts to candidate, sensitive, or special status plant species would occur.

However, the potential exists for protected bird species to be nesting in the street trees during Project construction. In order to avoid disturbance of nesting birds a mitigation measure shall be implemented to reduce impacts to nesting birds to a less than significant level. With the implementation of Mitigation Measure BIO-MM-1, impacts to sensitive plant and animal species would be less than significant and no further analysis of this topic in the EIR is required.

#### Mitigation Measure

**BIO-MM-1**: Prior to issuance of a grading permit, the Project Applicant shall demonstrate that the following requirements have been included in the Project construction plan:

- 1. Any construction activities that occur during the nesting season (February 15 to August 31) shall require that all suitable habitat (i.e., street trees and shrubs) be surveyed for the presence of nesting birds by a qualified biologist, retained by the Applicant as approved by the City of Los Angeles Building and Safety, before commencement of clearing and prior to grading permit issuance. The survey shall be conducted within 72 hours prior to the start of construction. A copy of the preconstruction survey shall be submitted to the City of Los Angeles Building and Safety.
- 2. If the required pre-construction survey detects any active nests, an appropriate buffer as determined by the biological monitor, shall be delineated, flagged, and avoided until the qualified biological monitor has verified that the young have fledged or the nest has otherwise become inactive.

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

**No Impact.** As discussed in the response to Checklist Question IV.a, the Project Site and surrounding area are located in a highly urbanized setting. The Project Site does not contain any drainage channels to the Los Angeles River (located approximately 0.89 mile to the east), riparian habitat, or other sensitive natural communities as indicated in the City or regional plans or in regulations by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). Furthermore, the Project Site is not located in or adjacent to a Significant Ecological Area (SEA) as defined by the City and County of Los Angeles. Therefore, the Project would not have an adverse effect on any riparian habitat or other sensitive natural community. No impact would occur and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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<sup>8</sup> City of Los Angeles Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report at page 2.18-13 (January 19, 1995), http://cityplanning.lacity.org/housinginitiatives/housingelement/frameworkeir/FrameworkFEIR.pdf. Accessed January 24, 2017.

County of Los Angeles Department of Regional Planning, County of Los Angeles Significant Ecological Areas Program, Figure 9.3, Significant Ecological Areas and Coastal Resources Areas Policy Map (February 2015), http://planning.lacounty.gov/assets/upl/project/gp\_2035\_2014-FIG\_9-3\_significant\_ecological\_areas.pdf. Accessed January 24, 2017.

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

**No Impact.** As discussed in the response to Checklist Question IV.a, the Project Site is located in a highly urbanized area and is developed with five existing office or light industrial buildings and a parking structure. The surrounding area has been fully developed with urban uses and associated infrastructure. The nearest water body, the Los Angeles River, which is located approximately 0.89 mile to the east, is concrete lined in its nearest stretch to the Project Site (i.e., near the 1<sup>st</sup> Street Bridge). The Project Site does not contain any wetlands as defined by Section 404 of the Clean Water Act. Therefore, the Project would not have an adverse effect on federally protected wetlands. No impact would occur and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

**No Impact.** As stated in the response to Checklist Question IV.a, the Project Site is currently developed with four commercial buildings and a 6-level parking structure. Because of the highly urbanized nature of the Project Site and surrounding area, the lack of a major water body other than the Los Angeles River, which is concrete lined in the Project vicinity and separated from the Project Site by rail facilities and multiple fence lines, and the lack of trees or natural open space area on the Project Site, the site does not contain substantial habitat for native resident or migratory species, or native nursery sites. Therefore, the Project would not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. No impact would occur and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. As stated in the response to Checklist Question IV.a, the Project Site is a developed lot with no trees and no natural open space areas. Trees planted in the adjacent ROWs are ornamental and are not considered protected resources. No locally protected biological resources, such as oak trees or California walnut woodlands, or other trees protected under the City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) exist on the Project Site or in the adjacent street ROWs. In accordance with LAMC Section 12.21.G.2, Open Space Requirement for Six or More Residential Units, the Project would be planting one 24-inch box tree for every four dwelling units, ultimately filling in existing street trees with similar species and planting trees within the site's open space, including the paseo. Project landscaping would comply with all requirements of the LAMC and the City's Urban

Forestry Division's requirements. Therefore, the Project would not conflict with local policies or ordinances protecting biological resources such as a tree preservation policy or ordinance. Impacts would be less than significant and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

**No Impact.** As discussed in the response to Checklist Question IV.a, the Project Site is located within a developed, urbanized area and does not provide habitat for any sensitive biological resources. The Project Site is not located within a habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan. <sup>10</sup> Therefore, the Project would not conflict with the provisions of any adopted conservation plan. No impact would occur and no mitigation measures are required. No further analysis of this topic in the EIR is required.

#### V. Cultural Resources

Would the project:

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

Potentially Significant Impact. A historical resource is defined in Section 15064.5(a)(3) of the State CEQA Guidelines as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Historical resources are further defined as those associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the California Register, included in a local register, or identified as significant in a historic resource survey are also considered historical resources under CEQA.

The entire block is identified by SurveyLA, the citywide historic resources survey of Los Angeles. SurveyLA noted that the Times, Plant, and Mirror Buildings are listed in the California Register and evaluated the Executive Building as eligible for listing in the California Register and for designation as a Los Angeles Historic-Cultural Monument for its association with the growth and maturation of the Los Angeles Times as well as the career of Otis Chandler, who was the publisher from 1960 to 1980. Because the Project proposes demolition of the Executive Building abutting the Times Building and new development would contrast in scale to the Times, Plant Building, and Mirror Buildings, the Project has the potential to directly or indirectly impact these

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California Department of Fish and Wildlife, Habitat Conservation Planning, Natural Community Conservation Planning, Summary of Natural Community Conservation Plans (NCCPs) (August 2015), https://www.wildlife.ca.gov/Conservation/Planning/NCCP/Plans. Accessed January 24, 2017.

historical resources. Therefore, the EIR will provide further analysis of potential impacts to historic resources.

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

**Potentially Significant Impact.** Section 15064.5(a)(3)(D) of the State CEQA Guidelines generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site has been previously graded and developed. Thus, surficial archaeological resources that may have existed at one time have been previously disturbed. Nonetheless, Project construction would require grading and excavation activities for building foundations and subterranean parking that could have the potential to disturb existing but undiscovered archaeological resources. Therefore, the EIR will provide further analysis of potential impacts to archaeological resources.

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

**Potentially Significant Impact.** The Project Site has been previously graded and developed or paved. In addition, no unique geologic features are anticipated to be encountered during Project construction. Therefore, the Project is not expected to directly or indirectly destroy a unique geologic feature. However, the Project would require grading and excavation for building foundations and subterranean parking that could extend into native soils potentially containing undiscovered paleontological resources. Therefore, the EIR will provide further analysis of potential impacts to paleontological resources.

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

**Less than Significant Impact.** As previously indicated, the Project Site has been previously graded and developed. Nonetheless, the Project Site would require excavation that would extend into native soils, which could result in the potential to encounter previously unknown human remains during excavation activities. The Project would comply with existing regulatory requirements that would ensure impacts related to human remains are less than significant.

If human remains are encountered unexpectedly during implementation of the Project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendant (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the

discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

Whenever the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

Therefore, the Project would have a less than significant impact with respect to the disturbance of human remains, including those interred outside of formal cemeteries. No mitigation measures are required and no further analysis of this topic in the EIR is required.

## VI. Geology and Soils

In 2015, the California Supreme Court in CBIA v. BAAQMD, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project.

In accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the project would have a significant impact related to geology and soils if it results in any of the following impacts to future residents or users.

*Would the project:* 

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions. Refer to Division of Mines and Geology Special Publication 42.

**Potentially Significant Impact.** The seismically active region of Southern California is crossed by numerous active and potentially active faults and is underlain by several blind thrust faults. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those that have shown evidence of movement within the past 11,000 years (i.e., during the Holocene Epoch).

Potentially active faults are those that have shown evidence of movement between 11,000 and 1.6 million years ago (i.e., during the Pleistocene Epoch). Inactive faults are those that have exhibited displacement greater than 1.6 million years before the present (i.e., during the Quaternary Epoch). Blind thrust faults are low angle reverse faults with no surface expression. Due to their buried nature, the existence of blind thrust faults is not usually known until they produce an earthquake.

Fault rupture is the displacement that occurs along the surface of a fault during the earthquake. The CGS has established earthquake fault zones known as Alquist-Priolo Earthquake Fault Zones around the surface traces of active faults to assist cities and counties in planning, zoning, and building regulation functions. These zones identify areas where potential surface rupture along an active fault could prove hazardous and identify where special studies are required to characterize hazards to habitable structures. In addition, the City's General Plan Safety Element has designated fault rupture study areas extending along each side of active and potentially active faults to establish areas of hazard potential due to fault rupture.

The Project Site is not located with an Alquist-Priolo Earthquake Fault Zone and the closest fault is the Puente Hills Blind Thrust, located approximately 1.3475 kilometers (0.84 mile) from the Project Site. However, since the Project Site is located within the seismically active Southern California region, the Project could expose people or structures to substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Therefore, the EIR will provide further analysis of potential impacts related to fault rupture.

## ii) Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?

**Potentially Significant Impact.** The Project Site is located within the seismically active Southern California region. The level of ground shaking that would be experienced at the Project Site from active or potentially active faults or blind thrust faults in the region would be a function

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City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS), Parcel Profile Report: 202-220 W. 1st Street. Generated January 25, 2017.

of several factors including earthquake magnitude, type of faulting, rupture propagation path, distance from the epicenter, earthquake depth, duration of shaking, site topography, and site geology. Active faults that could produce shaking at the Project Site include the Whittier-Elsinore Fault, San Jacinto Fault, San Andreas Fault, and numerous other smaller faults and blind thrust faults (including the Puente Hills Blind Thrust) found throughout the region. As with any new project development in the State of California, Project building design and construction would be required to conform to the current seismic design provisions of the City's Building Code, which incorporates relevant provision of the 2016 California Building Code (CBC), (effective 2017). The 2016 CBC, as amended by the City's Building Code, incorporates the latest seismic design standards for structural loads and materials to provide for the latest in earthquake safety. Nonetheless, the EIR will provide further analysis of potential impacts related to seismic ground shaking.

## iii) Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

**Potentially Significant Impact.** Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subject to high-intensity ground shaking.

Specifically, liquefaction occurs when the shock waves from an earthquake of sufficient magnitude and duration compact and decrease the volume of the soil; if drainage cannot occur, this reduction in soil volume will increase the pressure exerted on the water contained in the soil, forcing it upward to the ground surface. This process can transform stable soil material into a fluid-like state. This fluid-like state can result in horizontal and vertical movements of soils and building foundations from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Liquefaction occurs when three general conditions exist: 1) shallow groundwater; 2) low density non-cohesive (granular) soils; and 3) high-intensity ground motion.

The CGS has delineated seismic hazard zones in areas where the potential for strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events, which if designated requires cities and counties to regulate certain development projects within these zones until the geologic and soil conditions of a site are investigated and appropriate mitigation measures, if any, are incorporated into development plans. The Project Site is located in a City-designated liquefaction zone. As the Project is located within a designated liquefaction zone, and to provide a conservative analysis of seismic-related ground failure and liquefaction, the EIR will provide further evaluation of this issue.

## iv) Landslides caused in whole or in part by the project's exacerbation of the existing environmental conditions?

**No Impact.** The Project Site is not located within a City-designated Hillside Grading Area, is not subject to the City's Hillside Ordinance, and is not located in a City-designated Landslide

City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS) Parcel Profile Report: 202-220 W. 1st Street. Generated January 25, 2017.

area. <sup>13-14</sup> Furthermore, the Project Site is located in an urbanized area in which the Project Site and surrounding uses are entirely paved and impermeable, not allowing water to seep into the underlying formation. The Project Site is not located in proximity to any natural mountains or steep slopes and, as well as the surrounding area, does not have a history of landslides. Potential for landslides to occur on or near the Project Site is minimal or nonexistent. Therefore, the Project would not expose people or structures to potential substantial adverse effects involving landslides and would not exacerbate any existing environmental conditions related to landslides. No impact would occur and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

**Potentially Significant Impact.** During construction, the 3.6-acre Project Site would be subject to ground-disturbing activities (e.g., excavation, grading, soil stockpiling, foundation construction, the installation of utilities). These activities would expose soils for a limited time, allowing for possible erosion. In addition, the change in on-site drainage patterns resulting from the Project could also result in limited soil erosion. Thus, the EIR will provide further analysis of the potential for soil erosion resulting from Project construction and operation.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse caused in whole or in part by the project's exacerbation of the existing environmental conditions?

**Potentially Significant Impact.** As previously discussed in response to Checklist Questions VI.a.iii and a.iv, liquefaction hazards were concluded to be potentially significant and landslide hazards were concluded to have no impact. Subsidence occurs when a void is located or created underneath a surface, causing the surface to collapse. Common causes of subsidence include groundwater or oil resources or wells beneath a surface. Subsidence occurs when land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. No oil wells are located on the Project Site; however, the Project Site is located within 0.5 mile from the Union Station Oil Field to the east. 15·16 In addition, the Project Site is located within a potential liquefaction hazard zone and in an area subject to potentially high seismic ground shaking. Therefore, the EIR will provide further analysis of potential impacts related to lateral spreading, subsidence, liquefaction, and collapse.

J Ibid

<sup>13</sup> Ibid

City of Los Angeles General Plan Safety Element, Exhibit C: Landslide Inventory & Hillside Areas, http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf. Accessed on January 25, 2017.

City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS) Parcel Profile Report: 202-220 W. 1<sup>st</sup> Street. Generated January 25, 2017.

<sup>16</sup> City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit E–Oil Fields and Oil Drilling Areas in the City of Los Angeles. Available at http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf. Accessed on January 25, 2017.

# d) Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?

**Potentially Significant Impact.** Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Because the soils on the Project Site are currently unknown, there is potential for the soils on the Site to be subject to expansion resulting from changes in the moisture content. Therefore, the EIR will provide further analysis of potential impacts related to expansive soils.

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

**No Impact.** The Project Site is located in an urbanized area where wastewater infrastructure is currently in place. The Project would connect to existing infrastructure and would not use septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur and no mitigation measures are required. No further analysis of this topic in the EIR is required.

#### VII. Greenhouse Gas Emissions

Would the project:

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

**Potentially Significant Impact.** Construction and operation of the Project would increase greenhouse gas (GHG) emissions that have the potential to either individually or cumulatively result in a significant impact on the environment. In addition, the Project would generate vehicle trips that would contribute to the emission of GHGs. The amount of GHG emissions associated with the Project has not been estimated at this time. Therefore, the EIR will provide further analysis of the Project's greenhouse gas emissions.

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

Potentially Significant Impact. The Project would be required to comply with the City's Green Building Code pursuant to Chapter IX, Article 9, of the LAMC. In conformance with these requirements, the Project would be designed to reduce GHG emissions through various energy conservation measures. In addition, the Project is required to implement applicable energy conservation measures to reduce GHG emissions such as those described in California Air Resources Board AB 32 Scoping Plan, which describes the approaches California will take to achieve the goal of reducing GHG emissions to 1990 levels by 2020. Furthermore, because the Project would be designed to meet LEED Silver standards or the equivalent, the Project would incorporate sustainable elements of design during construction and operation. However, the GHG emissions associated with the Project have not been estimated at this time. Therefore, the

EIR will provide further evaluation of potential conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

#### VIII. Hazards and Hazardous Materials

In 2015, the California Supreme Court in CBIA v. BAAQMD, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. For example, if construction of the project on a hazardous waste site will cause the potential dispersion of hazardous waste in the environment, the EIR should assess the impacts of that dispersion to the environment, including to the project's residents.

Would the project:

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

Potentially Significant Impact. Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Furthermore, any emissions from the use of such materials would be minimal and localized to the Project Site. Operation of the Project would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, and pesticides for landscaping. The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. As with construction, any emissions from the use of such materials regarding the operation of the Project would be minimal and localized to the Project Site. Nevertheless, the EIR will evaluate the potential for the presence of hazardous environmental conditions on the Project Site.

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

**Potentially Significant Impact.** The Project Site is not located within a City-designated Methane Zone. <sup>17, 18</sup> Buildings demolished on-site may contain hazardous materials, which would require

<sup>17</sup> City of Los Angeles, Department of Building and Safety Methane and Methane Buffer Zone Map, 2004. Available at: https://www.partneresi.com/sites/default/files/methane-zone-map-los-angeles.pdf. Accessed on December 4, 2016.

City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS) Parcel Profile Report: 202-220 1st Street. Generated January 25, 2017.

remediation and abatement. Potential soil and water contamination impacts related to the past use of hazardous materials on the Project Site may also exist. Accordingly, the EIR will provide further analysis of potential impacts involving the release of hazardous materials.

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

**Potentially Significant Impact.** The nearest K through 12 school to the Project Site is the Ramon C. Cortines School of Performing Arts, a private 9-12 school located at 450 N. Grand Avenue. This school is located approximately 0.35 mile to the north of the Project Site, north of the US-101 Freeway. No LAUSD elementary, middle, or high schools are located with 0.25 mile or 0.5 mile of the Project Site. However, in a dense metropolitan area such as Downtown Los Angeles, numerous day care or pre-schools are likely to be associated with many of the civic, business, and residential uses. For instance, the Joy Picus Child Development Center a day care and preschool (0 to 5 years), is located at 111 E. 1<sup>st</sup> Street, approximately 0.1 mile to the east of the Project Site and the Grace Iino Child Care Center, a day care through kindergarten, is located at 231 E. 3<sup>rd</sup> Street, approximately 0.11 mile to the south of the Project Site. Because the construction of the Project includes emissions and potential handling and hauling of hazardous materials, and the proximity of these facilities and potentially other similar facilities to the Project Site, the EIR will provide further analysis of this topic.

# d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?

Potentially Significant Impact. Government Code Section 65962.5, amended in 1992, requires CalEPA to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 makes reference to the preparation of a list, many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions (such as a removal action) or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites (National Priorities List); State Response sites; Voluntary Cleanup sites; and School Cleanup sites. Because of the potential for listings associated with the site, as well as potential listed sites in the immediate vicinity (within 0.1 mile), the EIR will provide further evaluation of this issue.

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

**No Impact.** The Project Site is not within an airport land use plan and it is not within two miles of a public airport or public use airport. The nearest airport is the Hawthorne Municipal Airport located approximately 10 miles southwest of the Project Site. Therefore, the Project would not result in an airport-related safety hazard for people residing or working in the Project vicinity. No impact would occur and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

**No Impact.** There are no private airstrips in the vicinity of the Project Site, and the Project Site is not located within a designated airport hazard area. The nearest private airstrip to the Project Site is the Goodyear Blimp Base Airport, located approximately 13.5 miles to the south of the Project Site in the City of Carson. Because no private airstrips are within the Project vicinity, the Project would not result in airport-related safety hazards for the people residing or working in the area. No impact would occur and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

Potentially Significant Impact. The Project Site is located in an established urban area containing a concentration of critical facilities and lifeline systems.<sup>19</sup> While it is expected that the majority of construction activities for the Project would be confined on-site, short-term construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. A designated major communication center is located near the Project Site at W. 4th Street and S. Figueroa, and several City-designated Selected Disaster Routes are near and adjacent to the Project Site, including Broadway and Main Street.<sup>20</sup> Project construction activities would have the potential to affect access on the designated Selected Disaster Route on Broadway, as well as other routes in the vicinity. Thus, the EIR will provide further analysis of potential impacts to an adopted emergency response plan or emergency evacuation plan.

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Lifeline facilities includes distributive systems and related facilities necessary to provide electric power, oil and natural gas, water and wastewater, and communications.

City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit H - Critical Facilities & Lifeline Systems, http://cityplanning.lacity.org/cwd/gnlpln/ saftyelt.pdf. Accessed on January 25, 2017.

# 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 caused in whole or in part from the project's exacerbation of existing environmental conditions?

**No Impact.** The Project Site is located in a highly urbanized area. No wildlands are present on the Project Site or surrounding area. Furthermore, the Project Site is not within a City-designated wildfire hazard area.<sup>21</sup> In addition, the Project Site is not located within a City-designated Very High Fire Severity Zone.<sup>22</sup> Therefore, the Project would not expose people or structures to a significant risk involving wildland fires caused in whole or in part from the Project's exacerbation of existing environmental conditions. No impact would occur and no mitigation measures are required. No further analysis of this topic in the EIR is required.

## IX. Hydrology and Water Quality

Would the project:

## a) Violate any water quality standards or waste discharge requirements?

Potentially Significant Impact. The Project Site is currently developed with five interconnected buildings, including a six-level parking structure. The topography of the site rises to the west, directing stormwater runoff from the Project Site to the City's curb and gutter system to the east of the site. Construction of the Project would require earthwork activities, including grading and excavation of the Project Site, and the transport of potentially contaminated soils. During precipitation events in particular, construction activities associated with the Project have the potential to result in the conveyance of soils due to minor soil erosion during grading and soil stockpiling and subsequent siltation, as well as other pollutants into municipal storm drains. Excavation for the nine-level subterranean parking structure and other subsurface construction activities may require dewatering, depending on seasonal rain and other effects on groundwater table. While the Project would be required to implement design features and regulatory mechanisms related to water quality standards and waste discharge requirements, further evaluation of this topic will be provided in the EIR to identify potential impacts and appropriate mitigation measures.

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<sup>21</sup> City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit D – Selected Wildfire Hazard Areas in the City of Los Angeles, http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf. Accessed January 26, 2017.

City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS) Parcel Profile Report: 202-220 1st Street. Generated November 14, 2016.

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

Less Than Significant Impact. The Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. Water is supplied to the City from three primary sources, including the Metropolitan Water District's Colorado River and Feather River supplies (57 percent, Bay Delta 48 percent, Colorado River 8 percent), snowmelt from the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct (29 percent), local groundwater from the San Fernando groundwater basin (12 percent), as well as recycled water (2 percent).<sup>23</sup> Based on the City's most current Urban Water Management Plan (UWMP), in 2014 and 2015, LADWP had an available water supply of roughly 611,800 acre-feet, with approximately 18 percent coming from local groundwater.<sup>24</sup> Groundwater levels in the City are actively maintained via spreading grounds and recharge. Furthermore, the Project does not propose groundwater withdrawal. While there is a potential for dewatering during construction, any such dewatering would be limited and required to remove perched groundwater rather than groundwater from the water table; therefore, any dewatering would not have potential to withdraw groundwater from the water table. Lastly, the Project Site is currently approximately 100 percent developed with impervious surfaces, so the development of new impervious surfaces under the Project would not be expected to reduce groundwater recharge at the Project Site. Therefore, impacts would be less than significant and no mitigation measures are required. No further evaluation in the EIR is required.

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

**Potentially Significant Impact.** The Project Site is currently developed with commercial office uses and a parking garage. No streams are located within the Project vicinity. The Project would involve the demolition of a portion of the Project Site, construct new buildings, install new landscaping, and alter the roof and landscape areas of existing buildings, which would have the potential to alter the existing drainage patterns on the Project Site. While the Project would implement Best Management Practices (BMPs) to capture and treat first flush stormwater flows in accordance with the City's Los Impact Development (LID) Ordinance and Standard Urban Stormwater Mitigation Plan (SUSMP), further evaluation of potential erosion impacts will be provided in the EIR.

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Los Angeles Department of Water and Power: Facts and Figures, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?\_adf.ctrl-state=j77lkjtqw\_4&\_afrLoop=357285129360562. Accessed January 26, 2017.

Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, Exhibit ES-S – Service Area Reliability Assessment for Average Weather Year, adopted July 1, 2016, https://www.ladwp.com/cs/idcplg?IdcService=GET\_FILE&dDocName=QOELLADWP005416&RevisionSelecti onMethod=LatestReleased. Accessed December 5, 2016.

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

**Potentially Significant Impact.** As discussed above under response to Checklist Question IX.c, Hydrology and Water Quality, the Project has the potential to alter the existing drainage patterns on the Project Site. Therefore, the EIR will provide further evaluation of this topic.

# 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?

**Potentially Significant Impact.** As discussed above under response to Checklist Question IX.a and IX.c, Hydrology and Water Quality, the Project has the potential to alter the existing drainage patterns on the Project Site. Therefore, the EIR will provide further evaluation of potential stormwater drainage and runoff impacts.

#### f) Otherwise substantially degrade water quality?

Potentially Significant Impact. The Project would be required to implement a Stormwater Pollution Prevention Plan (SWPPP) that includes Best Management Practices to reduce pollutants in stormwater runoff from the Project Site, and also would be required comply with the City's Low Impact Development (LID) Ordinance and Standard Urban Stormwater Mitigation Plan (SUSMP) requirements requirement the implementation of good housekeeping practices intended to preclude sediment and hazardous substances from entering stormwater flows. While these are expected to avoid significant impacts to water quality standards and waste discharge requirements, further analysis of water quality impacts will be provided in the EIR to evaluate potential impacts and identify appropriate design features and regulatory compliance mechanisms.

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

## h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

**Less than Significant Impact (g-h).** The City's ZIMAS records and the Federal Emergency Management Agency (FEMA) map for the Project Site (Map No. 06037C1636F) do not show the site to be located within a 100-year flood hazard area.<sup>25, 26</sup> Streets in the City are used for curb and gutter drainage and can exhibit flow during a heavy rain. The Project, however, would not

<sup>25</sup> City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS) Parcel Profile Report: 202-220 1st Street. Generated January 26, 2017.

Federal Emergency Management Agency, Flood Insurance Rate Map, Map Number 06037C1636F, Effective Date: September 26, 2008, https://msc.fema.gov/portal/#searchresultsanchor. Accessed January 26, 2017.

encroach into the street and gutter drainage system or cause runoff to be impeded or redirected. Although streets in the City can experience surface runoff, flooding from the nearest body of water is not likely since the channelized Los Angeles River is located approximately 0.89 mile from the Project Site and at an elevation of approximately 238 feet above mean sea level (AMSL). The elevation of W. 1<sup>st</sup> Street in the Project area is approximately 290 feet AMSL, a height differential of approximately 52 feet compared to the Los Angeles River. No rise in the Los Angeles River would cause an inundation more than 50 feet in depth over a radius distance of 0.89 mile from the river. In addition, the Project Site is not located within an inundation area as indicated in the City's General Plan Safety Element.<sup>27</sup> Therefore, flooding impacts would be less than significant and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

Less than Significant Impact. The Project Site is not located within a potential inundation area for the Los Angeles River and/or an upstream dam.<sup>28</sup> As shown in the FEMA flood map for the Project area (Map No. 06037C1636F), the nearest flood zone is located in the vicinity of the Los Angeles River, approximately 0.89 mile to the east of the Project Site.<sup>29</sup> Therefore, the Project would not expose people or structures to a significant risk of loss or injury involving flooding. Impacts would be less than significant and no mitigation measures are required. No further analysis of this topic in the EIR is required.

### j) Inundation by seiche, tsunami, or mudflow?

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

The Project Site is located in an area of relatively flat topography and urban development, with no enclosed bodies of water upstream of the Project Site, and as such, there is no potential for inundation resulting from a seiche or mudflows. Although the Los Angeles River is located approximately 0.89 mile east of the Project Site, the river in this area is located within a sunken concrete-lined channel at several feet below the ground elevation of the Project Site, and any seiches that could potentially develop within this stretch of the river during an earthquake would not have the potential to inundate the Project Site. With respect to tsunami hazards, the Project Site is located approximately 16 miles inland (northeast) from the Pacific Ocean, and therefore

<sup>27</sup> City of Los Angeles General Plan, Safety Element Exhibit G, Inundation & Tsunami Hazard Areas (March 1994), http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf. Accessed January 26, 2017.

<sup>28</sup> Ibid

Federal Emergency Management Agency, Flood Insurance Rate Map, Map Number 06037C1636F, Effective Date: September 26, 2008, https://msc.fema.gov/portal/#searchresultsanchor. Accessed May 9, 2017.

would not be subject to a tsunami. Furthermore, the Project Site is not located on a City-designated tsunami hazard area.<sup>30</sup> Therefore, no impact would occur due to inundation by tsunami or mudflow and no mitigation measures are required. No further analysis of this topic in the EIR is required.

## X. Land Use and Land Use Planning

*Would the project:* 

#### a) Physically divide an established community?

Less Than Significant Impact. The Project Site is located within the Central City Community Plan area within the fully urbanized Downtown Los Angeles. The Project would be contained within the existing developed block bounded by W. 1st Street, S. Spring Street, W. 2nd Street, and S. Broadway, which is currently entirely developed with five interconnected buildings. The Project would not encroach into adjacent streets or require vacations of streets or changes in the City's circulation system that would divide an established community. Implementation of the Project would result in further infill within an already developed urban area, and development of the Project would occur within the boundaries of the Project Site as it currently exists. In addition, the Project would create a mid-block paseo between W. 1<sup>St</sup> Street and W. 2<sup>nd</sup> Street that would allow for pedestrian access through the site. This would facilitate pedestrian movement since the block is currently entirely covered by buildings that block any mid-block access. The Paseo would also accommodate public access between W. 1st Street and W. 2nd Street at the time Metro's 2<sup>nd</sup> Street and Broadway's station is developed to the south of W. 2<sup>nd</sup> Street, and would reduce the existing division between W. 1st Street and W. 2nd Street. Because the Project would not impede or encroach into the public right-of-way or cause any changes to the City's circulation system, and would improve pedestrian access, it would not result in the division of an established community. Impacts would be less than significant and no mitigation measures are required. No further analysis of this issue in the EIR is required.

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

Potentially Significant Impact. The Project Site is located within the Central City Community Plan Area, which designates the Project Site for Regional Commercial land uses. The existing designation allows for a Floor Area Ratio (FAR) of 6:1 with the Transfer of Floor Area as permitted by the Los Angeles Municipal Code. The land use designation corresponds with the zoning designation of C2-4D-SN, which permits general commercial and multi-family residential uses. The 4D Height District establishes a Floor Area Ratio (FAR) of 6.0:1, but does not specifically limit building heights.

<sup>30</sup> Ibid.

Other land use plans, policies, or regulations applicable to the Project Site include the Greater Downtown Housing Incentive Area, the Downtown Design Guide Project Area, the Historic Broadway Sign Supplemental Use District, and the Los Angeles State Enterprise Zone. The Project Site is located within a Transit Priority Area and an Adaptive Reuse Incentive Area.

- 1. The entitlements being requested for the Project include, but may not be limited to, the following: Transfer of Floor Area Rights (TFAR) greater than 50,000 square feet of floor area for the transfer of 548,440 square feet of floor area from the Los Angeles Convention Center (Donor Site) to the Project Site (Receiver Site) (LAMC Sec. 14.5.6-B).
- 2. Vesting Conditional Use Permit to permit floor averaging within a unified development (LAMC Sec. 12.24-W,19).
- 3. Master Conditional Use Permit (MCUB) to permit the on-site and off-site sale and consumption of alcoholic beverages within the Project's commercial retail spaces (LAMC Sec. 12.24-W,1).
- 4. Vesting Tentative Tract Map for the merger and re-subdivision of the Project Site for condominium purposes (LAMC Sec. 17.15). The Applicant is requesting to provide parking per LAMC requirements in lieu of the parking requirements under the Advisory Agency's Parking Policy for Condominiums.
- 5. Construction permits, including building, grading, excavation, foundation, and associated permits.
- 6. Haul Route Permit, as may be required.
- 7. Other approvals as needed.

Because the extent of applicable plans and the need for specific entitlements requiring discretionary action, further evaluation of the relationship of the Project to adopted plans and policies in the EIR is warranted.

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

**No Impact.** As discussed in the responses to Checklist Question IV, Biological Resources, the Project Site is located in an urbanized area and is developed with warehouse, wholesale commercial, and associated office, loading dock and parking uses. Although the channelized Los Angeles River is located approximately 0.89 mile east of the Project Site, the Project Site does not contain trees, vegetation and natural habitat, and thus does not support sensitive natural communities.

Furthermore, the Project Site is not located within or adjacent to a Significant Ecological Area (SEA) as defined by the City or County of Los Angeles. <sup>31,32</sup> The Project Site is not located within

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City of Los Angeles Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, at page 2.18-13 (January 19, 1995),

a habitat conservation plan or natural community conservation plan. Therefore, the Project would not conflict with the provisions of any adopted applicable conservation plan. No impact would occur and no mitigation measures are required. No further analysis of this topic in the EIR is required.

#### XI. Mineral Resources

*Would the project:* 

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact (a-b). According to the Conservation Element of the City of Los Angeles General Plan, much of Downtown Los Angeles is located within a Mineral Resource Zone (MRZ).<sup>33</sup>,<sup>34</sup> However, the Project Site is not designated as an existing Aggregate Production Area by the State of California or the U.S. Geological Survey.<sup>35</sup> The Project Site is located approximately 0.5 mile from the nearest active production field, the Union Station Oil Field to the east.<sup>36</sup> Also, the Project Site is fully developed with urban uses and, has not been the site of mineral resource extraction in the past, and rather than being designated for resource extraction, the Project Site is designated for Regional Commercial use by the City of Los Angeles General Plan. Therefore, Project implementation would not result in the loss of availability of a known mineral resource of value to the region and residents of the State, nor of a locally important mineral resource recovery site. No impacts to mineral resources would occur and no mitigation measures are required. No further analysis of Mineral Resources in the EIR is required.

http://cityplanning.lacity.org/housinginitiatives/housingelement/frameworkeir/FrameworkFEIR.pdf. Accessed January 26, 2017.

County of Los Angeles Department of Regional Planning, County of Los Angeles Significant Ecological Areas Program, Figure 9.3, Significant Ecological Areas and Coastal Resources Areas Policy Map (February 2015), http://planning.lacounty.gov/assets/upl/project/gp\_2035\_2014-FIG\_9-3\_significant\_ecological\_areas.pdf. Accessed January 26, 2017.

City of Los Angeles Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Figure GS-1 – Areas Containing Significant Mineral Deposits in the City of Los Angeles, http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF\_DraftEIR/GPF\_FEIR\_DEI R2.17\_p1-35.pdf. Accessed January 27, 2017.

City of Los Angeles Department of City Planning, Conservation Element, Exhibit A, https://planning.lacity.org/cwd/gnlpln/consvelt.pdf. Accessed May 9, 2017.

California Geological Survey, Aggregate Sustainability in California, California (2012),http://www.conservation.ca.gov/cgs/information/publications/ms/Documents/MS\_52\_2012.pdf. Accessed January 27, 2017.

City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit E–Oil Fields and Oil Drilling Areas in the City of Los Angeles, <a href="http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf">http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf</a>. Accessed January 25, 2017.

#### XII. Noise

Would the project result in:

# a) Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. Construction of the Project would require the use of heavy construction equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) that would generate noise on an intermittent, short-term basis. Additionally, operation of the Project may increase existing noise levels as a result of Project-related traffic, the operation of heating, ventilation, and air conditioning (HVAC) systems, vehicles in the surface and subsurface parking levels, loading and unloading of trucks, and resident and visitor activities on the Project Site. The Project may also increase vehicle traffic over existing conditions, which may increase local noise levels. As such, nearby noise-sensitive uses, such as residential uses or libraries, could potentially be affected. Therefore, the EIR will provide further evaluation of the Project's potential to expose sensitive receptors to noise levels in excess of applicable standards.

## b) Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?

**Potentially Significant Impact.** Construction of the Project may generate groundborne vibration and noise due to site grading, clearing activities, and haul truck travel. In addition, Project construction may require pile-driving. As such, the Project would have the potential to generate or to expose people to excessive groundborne vibration and noise levels during short-term construction activities. In addition to the potential to expose people to groundborne vibration, there is the potential for the Project to generate construction-related vibration that may impact adjacent historical resources. Therefore, the EIR will provide further evaluation of construction-related, groundborne noise levels.

Once construction is complete, Project operation (e.g., residential, office, restaurant, retail (including potential grocery)), would not generate excessive groundborne vibration or groundborne noise. As such, Project operation would not generate groundborne vibration or groundborne noise at levels beyond those which currently exist in an urbanized setting and would not have the potential to expose people to excessive groundborne vibration or groundborne noise, resulting in a less than significant impact. Therefore, no further analysis of operational groundborne vibration or groundborne noise in the EIR is required.

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

**Potentially Significant Impact.** As discussed in the response to Checklist Question XII.a, Project operation may increase existing noise levels as a result of Project-related traffic, the operation of HVAC systems, loading and unloading of trucks, traffic, and the presence of

residents and visitors at the Project Site. Therefore, the EIR will provide further evaluation of the potential permanent increase in ambient noise levels.

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

**Potentially Significant Impact.** As discussed in the response to Checklist Question XII.a, Project construction would require the use of heavy construction equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) that would generate noise on a short-term basis. Therefore, the EIR will provide further evaluation of potential impacts associated with a temporary or periodic increase in ambient noise levels.

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

**No Impact (e-f).** As discussed in the response to Checklist Question VIII.e, the Project Site is not located within an airport land use plan, within two miles of a public use airport, or within the vicinity of a private airstrip. The nearest public airport is the Hawthorne Municipal Airport located approximately 10 miles southwest of the Project Site and the nearest private airport or airstrip is the Goodyear Blimp Base Airport in the City of Carson, approximately 13.5 miles south of the Project Site. Therefore, the Project would not expose people in the Project vicinity to excessive noise levels from airport use. No impact would occur and no mitigation measures are required. No further analysis of this topic in the EIR is required.

## XIII. Population and Housing

Would the project:

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

Potentially Significant Impact. The Project Site is located within the jurisdiction of the Southern California Association of Governments (SCAG), a Joint Powers Agency established under California Government Code Section 6502 et seq. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. In April 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). The 2016 RTP/SCS presents the transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing the region's transportation and related challenges. It also includes projections of population, households, and

employment through 2040. Furthermore, the City's General Plan including its community plans address growth in the region.

The replacement of the existing Executive Building and bank with approximately 1,127 residential units would increase residential population in the area. The proposed approximately 50,000-square-foot grocery store and 34,572 square feet of retail uses associated with new development could potentially increase employment opportunities over the replaced uses. A detailed analysis comparing the Project's contribution to population, housing, and employment growth to SCAG's 2016 RTP/SCS, Central City Community Plan policies, and Citywide projections and policies regarding future development is warranted. Therefore, the EIR will provide further evaluation of the Project's potential population and housing impacts.

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

## c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

**No Impact (b-c).** No dwelling units are currently located on the Project Site. Because no housing would be displaced, the construction of replacement housing elsewhere would not be necessary. No impact would occur and no mitigation measures are required. Further analysis of this topic in the EIR is not required.

#### XIV. Public Services

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

## a) Fire protection?

**Potentially Significant Impact.** The Los Angeles Fire Department (LAFD) provides fire protection and emergency medical services in the City of Los Angeles. The Project area is located in the LAFD's Central Bureau and served by the Central Division/Station. The nearest stations to the Project Site are LAFD Station 3 at 108 N. Fremont, located approximately 0.51 mile to the northwest, and Station 4 at 450 E. Temple Street, located approximately 0.72 mile to the east. Fire Station No. 4 is the first-in station to calls for service at the Project Site.<sup>37</sup>

Because the Project would increase the developed floor area and height of buildings on the Project Site, and increase the population on the Project Site, it could increase demand on LAFD fire protection and emergency medical services and potentially affect demand on LAFD facilities which could result in the need for new or physically altered governmental facilities to maintain

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Los Angeles Fire Department, Find Your Station, http://www.lafd.org/fire-stations/find-your-station. Accessed January 27, 2017.

service. Therefore, the EIR will provide further evaluation of the Project's potential impacts on fire protection services.

#### b) Police protection?

**Potentially Significant Impact.** The Los Angeles Police Department (LAPD) provides police protection services in the City of Los Angeles. The LAPD is divided into four Police Station Bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. Each of the Bureaus encompasses several communities. The Project Site is located in LAPD's Central Bureau, which serves the Downtown business district, as well as the communities of Eagle Rock, the Garment District, MacArthur Park, Dodger Stadium, Chinatown, Little Tokyo, Griffith Park, and the Toy District.<sup>38</sup>

Specifically, the Project Site is served by the Central Community Police Station located at 251 E. 6<sup>th</sup> Street, approximately 0.65-mile south of the Project Site. Because the Project would increase the developed floor area and population on the Project Site, it could increase demand on LAPD police protection services and, potentially, demands on LAPD facilities, which could result in the need for new or physically altered governmental facilities to maintain acceptable service ratios or other performance objectives. Therefore, the EIR will provide further evaluation of the Project's potential impacts on police protection services.

#### c) Schools?

**Potentially Significant Impact.** The Project Site is located within the jurisdiction of the Los Angeles Unified School District (LAUSD), and specifically within LAUSD's East Local District.<sup>39</sup> The Project Site is within the attendance boundaries of 9<sup>th</sup> Elementary School, Hollenbeck Middle School, and Metropolitan Continuation High School, and within a LAUSD Zone of Choice with multiple high school options. Because the Project would introduce a new resident population to the Project Site, a greater demand on LAUSD schools would be generated. Therefore, potential impacts to local schools will be analyzed further in the EIR.

### d) Parks?

**Potentially Significant Impact.** The City of Los Angeles Department of Recreation and Parks provides park facilities and services within the City of Los Angeles. Because the Project would introduce new residents to the Project Site who might visit nearby City parks, greater demand on existing City parks could be generated. The Project would incorporate an open-to-the-sky Paseo, a 15,708-square foot open space available to the public, and 73,128 square feet of common open space for the Project's residents, including a 6<sup>th</sup> Floor garden terrace and pool deck and other recreational amenities. In addition, the Project would incorporate a rooftop office terrace on the 6<sup>th</sup> floor of the Plant Building, which would incorporate break lounges and conference areas for use by the employees of the Times, Plant, and Mirror Buildings. Although the Project would

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<sup>&</sup>lt;sup>38</sup> Los Angeles Police Department, About Central Bureau, http://www.lapdonline.org/central\_bureau/content\_basic\_view/1908. Accessed January 27, 2017.

<sup>39</sup> Los Angeles Unified School District, Local District East Map (June 2015), http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/Domain/33/East.pdf. Accessed January 27, 2017.

include open space areas and recreational amenities that would reduce the Project's demand for parks, overall demand on City parks associated with the Project's permanent residents could increase. Therefore, the EIR will provide further analysis of potential impacts to parks.

#### e) Other public facilities?

**Potentially Significant Impact.** The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles. Because the Project would introduce new residents to the Project Site, demand on LAPL library services could increase. Therefore, the EIR will provide further analysis of potential impacts associated with library services.

During construction and operation of the Project, other governmental services, including roads, would continue to be utilized. Project residents would use the existing road network, without the need for new roadways to serve the Project Site. As discussed in Checklist Question XVI, Transportation/Traffic, the Project could result in an increase in the number of vehicle trips attributable to the Project Site. However, the additional use of roadways would not be excessive and would not necessitate the upkeep of such facilities beyond normal requirements. Any minor roadway improvements (e.g., street dedications), pursuant to City requirements, would be constructed concurrent with the Project and would be analyzed as needed throughout the EIR. Therefore, the Project would result in less-than-significant impacts and no mitigation measures are required. Further analysis of other governmental services related to roadways in the EIR is not required.

#### XV. Recreation

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

**Potentially Significant Impact.** As discussed in the response to Checklist Question XIV.d, because the Project would introduce new population to the Project Site, greater demand on existing public recreational and park facilities and services could be generated. Therefore, the EIR will provide further evaluation of the Project's potential impacts on recreational services.

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

**Potentially Significant Impact.** Although the Project would include the development of on-site open space and recreational amenities (see the response to Checklist Question XIV.d), it could potentially require the development and/or expansion of existing off-site park, open space and recreational amenities. The construction of such amenities could potentially result in adverse physical effects on the environment. Therefore, the EIR will provide further evaluation of the Project's potential impacts related to expansion of recreational services.

## XVI. Transportation/Traffic

Would the project:

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

**Potentially Significant Impact.** The Project Site is subject to the Los Angeles Department of Transportation (LADOT) standards and guidelines regarding trip generation and levels of service (LOS) for the street system. The Project would develop the Project Site with 1,127 residential units and approximately 50,000 square feet of grocery store floor area, and 34,572 square feet of retail floor area. In addition to the grocery store, the rehabilitated Time, Plant, and Mirror buildings would contain 41,017 square feet of new retail/restaurant uses and 285,088 square feet of offices. However, the floor area of the rehabilitated Times, Plant, and Mirror Buildings would be the same as the existing buildings. The Project would substantially increase residential use in the immediate area, although reducing office space uses with the demolition of the on-site Executive Building. The new residential uses would add traffic to local and regional transportation systems. Thus, operation of the Project could adversely affect the existing capacity of the street system or exceed an established LOS standard. Project construction would also result in a temporary increase in traffic due to construction-related truck trips and worker vehicle trips. Therefore, traffic impacts during construction could also adversely affect the street system. As the Project has the potential to result in a significant traffic impact, further analysis of this topic, including mass transit and non-motorized travel, will be provided in the EIR.

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

**Potentially Significant Impact.** The CMP is a State-mandated program enacted by the State legislature to address the impacts that urban congestion has on local communities and the region as a whole. Metro is the local agency responsible for implementing the requirements of the CMP. New projects located in the City of Los Angeles must comply with the requirements set forth in the Metro's CMP. These requirements include the provision that all freeway segments where a project could add 150 or more trips in each direction during the peak hours be evaluated. The guidelines also require evaluation of all designated CMP intersections where a project could add 50 or more trips during either peak hour. The Project would generate vehicle trips, which could potentially add trips to a freeway segment or CMP intersection. Thus, the EIR will provide further analysis of this topic.

# 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?

**No Impact.** As discussed in the response to Checklist Question VIII.e, the nearest airport or heliport is the Hawthorne Municipal Airport, approximately 10 miles southwest of the Project Site. As such, the Project Site is not within any flight paths, does not propose any construction that would require notification of the Federal Aviation Administration, and would not result in a change in air traffic patterns, including increases in traffic levels or changes in location that would result in substantial safety risks. No impact would occur and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

**Potentially Significant Impact.** Project construction may require temporary lane or sidewalk closures. Access on and near the Project Site could also be temporarily disrupted resulting in conflicts with vehicles, pedestrians and/or bicyclists. Also, Project operation may alter the way vehicles ingress and egress the Project Site, increase trip generation and driveway use compared to existing on-site uses, and increase traffic on local streets. Considering these factors, the potential for hazardous conditions during Project construction and operation may increase over existing conditions. Therefore, the EIR will provide further analysis of this topic.

## e) Result in inadequate emergency access?

**Potentially Significant Impact.** Immediate vehicular access to the Project Site is provided by W. 1<sup>st</sup> Street, S. Spring Street, W. 2<sup>nd</sup> Street, and S. Broadway. While it is expected that the majority of construction activities for the Project would be confined on-site, short-term construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. In addition, the Project would generate traffic in the Project vicinity and would modify Project Site access from streets that surround the Project Site. Thus, the EIR will provide further analysis of potential impacts to emergency access.

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

**Potentially Significant Impact.** City plans, such as Angel's Walk, are intended to link transit and pedestrian districts of historic Downtown and to tie public investment in bus and rail transit to urban design improvements that make the City attractive to pedestrians. The Project Site is located in an area well-served by public transportation. Metro's Los Angeles Civic Center/Grand Park Station is located approximately 750 feet to the northwest of the Project Site. Metro's future 2<sup>nd</sup> Street and Broadway Station, one of the three subway stations in Metro's under-construction Regional Connector Project. Several bus lines serve the vicinity of S. Spring Street and W. 1<sup>st</sup> Street, including LADOT's Dash Downtown "D" line, Metro's Rapid Line 770, Metro's Rapid

Line 745, and Metro's Rapid Line 733. Numerous local lines are also located in the Project vicinity, including Metro's Lines Bus Lines 2, 4, 10, 28, 81, 83, 90, 91, 94, and 302, which run northbound along Broadway, and Lines 30, 33, 40, 45, 68, 83, 84, 92, and 330, which run southbound along Spring Street.<sup>40</sup> The Project Site is also served by dedicated bike lanes in southbound Spring Street and northbound Main Street. Although the Project Site is well served by public transportation, and would be anticipated to improve the pedestrian experience through the provision of a public paseo between W. 1<sup>st</sup> Street and W. 2<sup>nd</sup> Street, the EIR will provide further analysis of the Project's consistency with policies, plans, and programs supporting alternative transportation, such as Angel's Walk.

#### XVII. Tribal Cultural Resources

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

- a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?
- b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Potentially Significant Impact (a-b). Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to tribal cultural resources, as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Any information gained during the consultation process will be used to analyze impacts to tribal cultural resources in the EIR. The existence of tribal cultural resources on the Project Site is currently unknown; as such, further analysis of this topic will be provided in the EIR to determine the potential for, and significance of, the Project's impacts on tribal cultural resources.

<sup>40</sup> LA Metro, Metro Bus and Rail System Map – Downtown Los Angeles Detail (2016), https://media.metro.net/documents/742b6116-1c6a-47af-93f3-514cbc8a4fb8.pdf. Accessed June 12, 2017.

## XVIII. Utilities and Service Systems

Would the project:

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

Potentially Significant Impact. The City Department of Public Works (LADPW) provides wastewater services for the Project Site. Any wastewater generated at the Project Site is treated at the Hyperion Treatment Plant (HTP). The HTP is a part of the Hyperion Treatment System, which also includes the Tillman Water Reclamation Plant (TWRP) and the Los Angeles-Glendale Water Reclamation Plant (LAGWRP). The HTP is designed to treat 450 million gallons per day (mgd) HTP has an average dry water flow of approximately 362 mgd, leaving approximately 88 mgd of capacity available. The discharge of effluent from the HTP into Santa Monica Bay is regulated by the HTP's National Pollutant Discharge Elimination System (NPDES) Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board (RWQCB)'s requirements for a recreational beneficial use. The Project would result in new sources of wastewater generated at the Project Site with the development of the increase in developed floor area on the Project Site and introduction of 1,127 new residential units and new landscaped areas. The incremental increase in the quantity of wastewater generated by the Project could potentially result in impacts with respect to wastewater treatment. Therefore, the EIR will provide further analysis of this topic.

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

**Potentially Significant Impact.** Water and wastewater systems consist of two components, the source of the water supply or place of sewage treatment, and the conveyance systems (i.e., distribution lines and mains) that link these facilities to Project Site. Given the Project's proposed increase in developed floor area on the Project Site and introduction of 1,127 new residential units, the EIR will provide further analysis of this topic.

# c) Require or result in the construction of new storm water drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects?

**Potentially Significant Impact.** Under existing conditions, the Project Site is completely developed with five interconnected buildings. Current drainage flows on the Project Site are to

The HTP is an end-of-the-line plant, subject to diurnal and seasonal flow variation. It was designed to provide full secondary treatment for a maximum-month flow of 450 mgd, which corresponds to an average daily waste flow of 413 mgd, and peak wastewater flow of 850 mgd. (Information regarding peak flow is included in the City of Los Angeles Department of Public Works, Bureau of Sanitation, Water Integrated Resources Plan (IRP), Volume 1, Wastewater Management, 2006; page 7-3.)

City of Los Angeles Department of Public Works, Bureau of Sanitation website, Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/wcnav\_externalId/s-lsh-wwd-cw-p-hwrp?\_adf.ctrl-state=modqzbl8f\_4&\_afrLoop=33199812189076655. Accessed January 27, 2017.

the east and collected in the City's existing curb and gutter drainage system. Project implementation would require grading, could result in alterations to the drainage pattern at the Project Site, and would require verification of available capacity in the municipal storm drain system. Therefore, the EIR will provide further analysis of potential impacts related to stormwater drainage.

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

**Potentially Significant Impact.** The Project would develop 1,127 new residential units, a grocery store, and retail uses, which Project would increase water demand beyond the existing office building and parking structure that would be removed. Sections 10910-10915 of the State Water Code (Senate Bill [SB] 610) requires the preparation of a water supply assessment (WSA) demonstrating sufficient water supplies for a project that includes more than 500 dwelling units. A WSA will be required for the Project include 1,127 dwelling units. Further of this topic will be provided in the EIR in order to assess projected water demand and the sufficiency of current water supplies.

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

**Potentially Significant Impact.** Given the increase in developed floor area proposed on the Project Site and introduction of 1,127 new residential units, the Project would result in an increase in wastewater generation compared to existing conditions. Therefore, the EIR will provide further analysis of potential impacts related to wastewater capacity.

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

Potentially Significant Impact. Solid waste management in the City of Los Angeles involves both public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. The City of Los Angeles Bureau of Sanitation (BOS) is responsible for developing strategies to manage solid waste generation and disposal in the City of Los Angeles. The BOS collects solid waste generated primarily by single-family dwellings, small multi-family dwellings, and public facilities. Private hauling companies collect solid waste generated primarily from large multi-family residential, commercial, and industrial properties. The City of Los Angeles does not own or operate any landfill facilities, and the majority of its solid waste is disposed of at County landfills.

The remaining disposal capacity for the County's Class III landfills is estimated at approximately 114 million tons as of December 31, 2015, the most recent data available.<sup>43</sup> In addition to in-County landfills, out-of County disposal facilities may also be available to the City of Los Angeles. Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County's landfills, and based on the Los Angeles County Integrated Waste Management Plan (ColWMP), the County anticipates that future Class III disposal needs can be adequately met through 2030 through a combination of landfill expansion, waste diversion at the source, out-of-County landfills, and other practices.

The Project would demolish the existing Executive Building, totaling approximately 176,258 square feet, and a 6-level parking structure, thus generating construction debris. Proposed uses include approximately 1,127 new residential units, approximately 34,572 square feet of new retail/restaurant uses, approximately 41,017 square feet of new commercial floor area in the rehabilitated buildings, and a potential 50,000-foot grocery store or other retail use that would generate solid waste during future Project operations. During operation, Project-related waste generation from office uses would be incrementally reduced by incremental reduction in overall office space. Disposal would occur pursuant to City Ordinances that require the use of certified haulers and implementation of practices to recycle exported materials. Because the Project would generate waste and would potentially impact remaining landfill capacity, the EIR will provide further analysis of this topic.

## g) Comply with Federal, State, and local statutes and regulations related to solid waste?

Potentially Significant Impact. Disposal and recycling of the construction debris would be required to comply with all Federal, State, and local regulations. All local governments, including the City of Los Angeles, are required under Assembly Bill 939 (AB 939), the Integrated Waste Management Act of 1989, to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. The California Department of Resources and Recycling and Recovery (CalRecycle) is the California State Agency that promotes the importance of reducing waste and oversees California's waste management and recycling efforts. CalRecycle has issued jurisdiction waste diversion rate targets equivalent to 50 percent of the waste stream as expressing in pounds per person per day. If the City's target is exceeded, the City would be required to pay fines or penalties from the State for not complying with AB 939. Because of several state, county and city plans and policies that address the availability of sufficient landfill capacity and the diversion/recycling of waste debris, further analysis of the Project's waste generation and consistency with plans and policies to increase diversion of waste will be provided in the EIR.

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County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2015 Annual Report, https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF. Accessed June 12, 2017.

## XVX. Mandatory Findings of Significance

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

**Potentially Significant Impact.** The Project would not substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal. Also, the Project would not eliminate important examples of the major periods of California history or prehistory.

However, as discussed in this Initial Study, the Project could result in environmental impacts that have the potential to degrade the quality of environment as addressed herein. Potentially affected resources include Air Quality, Cultural Resources (Archaeological, Paleontological, and Historical Resources), Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services (Fire, Police, Schools, Parks, and Libraries), Transportation/Circulation (Traffic and Access), Tribal Cultural Resources, and Utilities (Water, Wastewater, and Solid Waste). An EIR will be prepared to analyze and document these potentially significant impacts. Potentially significant impacts on biological resources include construction impacts on protected nesting birds. However, a mitigation measure is provided in the Initial Study that would reduce this impact to a less than significant level. As such, impacts to biological resources will not be further addressed in the EIR.

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

**Potentially Significant Impact.** The potential for cumulative impacts occurs when the independent impacts of a given Project are combined with the impacts of related projects in proximity to the Project Site that would create impacts that are greater than those of the Project alone. Related projects include past, current, and/or probable future projects whose development could contribute to potentially significant cumulative impacts in conjunction with a given project.

Each of the topics determined to have the potential for significant impacts in this Initial Study will be subject to further evaluation in the EIR, including evaluation of the potential for cumulatively significant impacts. Topics for which Initial Study determinations were "No Impact" or "Less Than Significant Impact" have been determined not to have the potential for significant cumulative impacts.

With respect to potential contributions to cumulative impacts for agricultural resources, biological resources, the potential for human remains, and mineral resources, the Project Site is located in an urbanized area, and like the Project, other development occurring in the area would also constitute urban infill in already densely developed areas. Thus, the Project is unlikely to combine with related projects or other cumulative growth to result in significant cumulative impacts with respect to agricultural and mineral resources. With respect to biological resources, the Project would implement Mitigation Measure BIO-MM-1, as stated under Checklist Question IV.a, which would ensure that potential impacts to nesting birds would be reduced to a less than significant level. Impacts to sensitive plant and animal species would not be cumulatively considerable, as no such habitat occurs in the vicinity of the Project Site or related projects due to the existing urban development. Biological resources are generally site-specific and need to be evaluated within the context of each individual project. In regards to human remains, the Project would be required to comply with existing regulatory requirements that would ensure impacts related to human remains are less than significant. Furthermore, related projects would be required to comply with existing regulatory requirements and the City's building permit review and approval process, which address these subjects.

With respect to aesthetics, because the Project is a mixed-use residential and employment center project that would be located on an infill site within a Transit Priority Area, under SB 743, aesthetic impacts of the Project would be considered less than significant. Aesthetic impacts would still be analyzed in the EIR for informational purposes only. The Project Site is not located in areas that are designated by the City or County to be Landslide areas, within a 100-year flood hazard area, inundation area, or a significant ecological area (SEA); therefore, the Project would have no impact and there would be no potential for cumulative impacts. Because the Project Site is already previously developed, approximately 100-percent impermeable, and served by existing wastewater infrastructure, there would be no Project or cumulative impact on septic tanks or the reduction of groundwater recharge. Since the Project Site is not located within two miles of an airport or within any flight paths, any cumulative impacts with regards to airports and air traffic would be less than significant. Impacts regarding dividing a community or displacing housing are site specific, and because the Project would have no impact on those issues, there would be no potential for cumulative impacts. Therefore, Project implementation would not be expected to result in a considerable contribution to cumulatively significant impacts for these resources. No further discussion of potential cumulative effects for these topics is required in the EIR.

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

**Potentially Significant Impact.** As discussed in this Initial Study, the Project could result in potentially significant environmental impacts associated with Aesthetics (Aesthetics, Views, Light and Glare, and Shade and Shadow), Air Quality, Cultural Resources (Archaeological, Paleontological, and Historical Resources), Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services (Fire, Police, Schools, Parks, and Libraries), Transportation/ Circulation (Traffic and Access), Tribal Cultural Resources, and Utilities (Water, Wastewater, and Solid Waste). These impacts could have potentially adverse effects on human beings, and the EIR will provide further analysis of these potential impacts.