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CARMEN A. TRUTANICH
City Attorney

REPORT NO. R 10 - 0 2 9 8
AUG 24 2010

REPORT RE:

**DRAFT OF ORDINANCE AMENDING THE LOS ANGELES SPORTS AND
ENTERTAINMENT DISTRICT SPECIFIC PLAN**

The Honorable City Council
of the City of Los Angeles
Room 395, City Hall
200 North Spring Street
Los Angeles, California 90012

Council File No. 09-3070
CPC File No. 2009-2667-SPA-ZC-DA

Honorable Members:

We are transmitting to you for your consideration, approved as to form and legality, a draft ordinance that would amend the Los Angeles Sports and Entertainment District Specific Plan (LASED).

Charter Findings

Pursuant to Charter Section 559, the Director of Planning has approved this draft ordinance on behalf of the City Planning Commission and recommended that the City Council adopt it. Should the City Council adopt this ordinance, it may comply with the provisions of Charter Section 558 by either adopting the findings of the Director of Planning as set forth in his report dated August 13, 2010, or by making its own findings.

CEQA Findings

The development encompassed by the LASED was evaluated for environmental impacts under Environmental Impact Report (EIR) Number 2000-3577 (State Clearinghouse No. 2000091046), and certified by the City Council on September 4, 2001. On December 1, 2006, the City Council adopted an addendum in connection with its approval of Ordinance No. 178,134, which amended the LASED. A second addendum was prepared to discuss the potential impacts of additional changes to development permitted by the LASED. On November 30, 2007, the City Council adopted Ordinance No. 179,413, again amending the LASED. On December 21, 2009, the Planning Commission recommended adoption of another LASED amendment, adopted related California Environmental Quality Act (CEQA) findings approving the use of the addendum and concluding that the revised project will not create any new impacts or result in any substantial increase in the severity of previously identified potentially significant impacts, and therefore no additional environmental clearance is required under State CEQA Guidelines 15162, that the previously adopted mitigation monitoring program is adequate for the revised project and that the addendum was prepared in compliance with CEQA. If, after reviewing and considering the EIR and addendum, you agree, you may comply with CEQA by adopting the December 21, 2009, CEQA findings of the City Planning Commission concluding that no additional environmental clearance is required under State CEQA Guidelines Section 15162.

Summary of Ordinance Provisions

The draft ordinance would amend the LASED to increase the maximum permitted floor area within the Specific Plan from 5,515,101 square feet to 5,827,313 square feet, which is an increase of 312,212 square feet. The increase in floor area would be allocated to Development Site 12 on the Olympic North Subarea of the Plan. The amendment would also transfer 27,508 square feet of unused floor area from Development Site 1 (currently developed with a cinema and conference center); and would transfer 57,830 square feet from Development Site 2 (currently developed with a convention hotel and residences) to Development Site 12. The transfers of floor area (865,338 square feet total), and allocation of new floor area (312,212 square feet), to Development Site 12 result in 397,550 new square feet of floor area being assigned to that Site. The draft ordinance has both a maximum square footage as well as a trip cap, which is contained within a Specific Plan Equivalency Matrix. The amendment would introduce new uses to Development Site 12 at the Olympic North Subarea to allow for broadcasting and production studio uses along with general office uses and would also increase the currently existing height limit at the Olympic North subarea from 200 feet to 350 feet.

Council Rule 38 Referral

A copy of the final draft ordinance was sent, pursuant to Council Rule 38, to the Department of Building and Safety. The Department will report any comments it may have directly to you.

If you have any questions regarding this matter, please contact Deputy City Attorney Terry P. Kaufmann Macias at (213) 978-8233. She or another member of this Office will be present to answer any questions you may have when you consider this matter.

Very truly yours,

CARMEN A. TRUTANICH, City Attorney

By 

DAVID MICHAELSON
Chief Assistant City Attorney

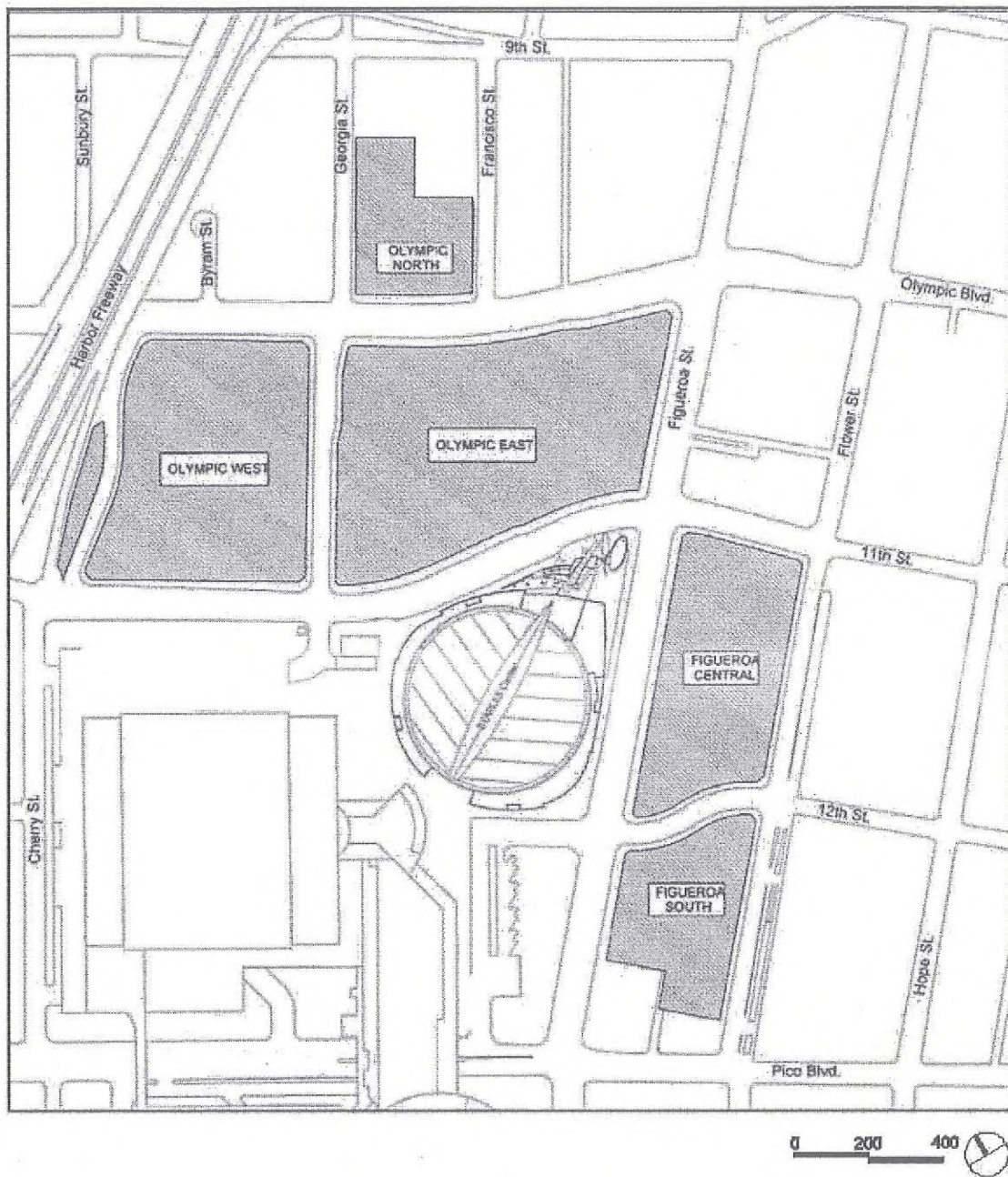
DM/TPKM:pj
Transmittal

ORDINANCE NO. _____

An ordinance amending the Los Angeles Sports and Entertainment District Specific Plan, Ordinance Nos. 174,222, 178,134 and 179,413 for a portion of the Central City Community Plan area.

**THE PEOPLE OF THE CITY OF LOS ANGELES
DO ORDAIN AS FOLLOWS:**

Section 1. Map 1 of Section 1 of the Los Angeles Sports and Entertainment District Specific Plan, Ordinance No. 174,224, as amended by Ordinance Nos. 178,134 and 179,413, is amended to read:



MAP 1
BOUNDARIES OF SPECIFIC PLAN AREA

Sec. 2. The definitions for the terms "Development Agreement" and "Olympic North Subarea" contained in Section 4 of the Los Angeles Sports and Entertainment District Specific Plan, Ordinance No. 174,244, as amended by Ordinance Nos. 178, 134 and 179, 413, are amended to read:

Development Agreement. A development agreement, authorized pursuant to California Government Code Section 65864, et seq., entered into by the City of Los Angeles, the LA Arena Land Company, Inc, and Flower Holdings, LLC., in September of 2001, as amended in December 2003, September 2005, December 2006, November 2007, and in September 2010 relating to, among other things, the Specific Plan area.

Olympic North Subarea. That area bounded by Georgia Street on the west, Francisco Street on the east, Olympic Boulevard on the south, and extending approximately 2/3 of the length of the block to James M. Wood Boulevard on the north, as shown on Map 1.

Sec. 3. Subsections B and C of Section 5 of the Los Angeles Sports and Entertainment District Specific Plan, Ordinance No. 174,244, as amended by Ordinance Nos. 178, 134 and 179,413, are amended to read:

B. Maximum Permitted Floor Area. The maximum total permitted Floor Area within the Specific Plan shall not exceed 5,827,313 square feet.

C. Project Land Use. The Specific Plan shall be developed with the following land uses. These land uses shall be developed in those locations, as shown on Map 2, the Specific Plan Land Use Map; provided, however, that the amount of square footage permitted for the individual uses listed below may be modified, and the locations of these land uses may be modified, pursuant to Equivalency Transfers as set forth in Section 9 of this Specific Plan.

Land Use Category	<u>Square Footage</u>
Hotel and Ballroom	1,389,106
Retail/Entertainment/Restaurant	789,486
Convention Center Expansion	250,000
Office	847,600
Residential	2,423,794
Cinema	127,327
Total Square Footage	5,827,313

Sec. 4. Subdivision 1 of Subsection B of Section 6 of the Los Angeles Sports and Entertainment District Specific Plan, Ordinance No. 174,224, as amended by Ordinance Nos. 178,134 and 179413, is amended to read:

1. The land use designated on all portions of the Development Site may be exchanged for another land use, so long as the new use is otherwise permitted

by this Specific Plan and the Floor Area of the new use is in conformance with the Land Use Equivalency Matrix. In no event shall the maximum permitted Floor Area exceed 5,827,313 square feet.

Sec. 5. The table entitled "Equivalency Matrix – Land Use Square Footage Conversion Factors" contained in Section 6 of the Los Angeles Sports and Entertainment District Specific Plan, Ordinance No. 174,224, as amended by Ordinance Nos. 178,134 and 179, 413, is amended to read:

EQUIVALENCY MATRIX **LAND USE SQUARE FOOTAGE CONVERSION FACTORS**

From this land use ↓	To this land use →	Hotel	Live Theater	Enter- tainment	Museum	Restaurant	Retail	General Office	Residential	Sports Broadcast Office	Cinemas	Convention Center Expansion	Production/ Tech. Office/ Studio
Hotel		NA	17.111 ¹	0.417 ²	0.349	0.093	0.169	0.272	1.203 ³	0.800	4.968	0.376	0.646
Live Theater		0.058 ⁴	NA	0.024 ⁵	0.020	0.005	0.010	0.016	0.070 ⁶	0.047	0.290	0.022	0.083
Entertainment		2.399 ⁷	41.056 ⁸	NA	0.838	0.224	0.404	0.653	2.887 ⁹	1.919	11.919	0.901	1.549
Museum		2.864	49.000	1.193	NA	0.267	0.483	0.779	3.445	2.291	14.226	1.076	1.849
Restaurant		10.714	183.333	4.465	3.741	NA	1.806	2.915	12.891	8.571	53.226	4.024	6.918
Retail		5.932	101.500	2.472	2.071	0.554	NA	1.614	7.137	4.745	29.468	2.228	3.830
General Office		3.675	62.889	1.532	1.283	0.343	0.620	NA	4.422	2.941	18.258	1.381	2.373
Residential		0.831 ¹⁰	14.222 ¹¹	0.346 ¹²	0.290	0.078	0.140	0.226	NA	0.665	4.129	0.312	0.537
Sports Broadcast Office		1.250	21.389	0.521	0.436	0.117	0.211	0.340	1.504	NA	6.210	0.470	0.807
Cinemas		0.201	3.444	0.084	0.070	0.019	0.034	0.055	0.242	0.161	NA	0.076	0.130
Convention Center Expansion		2.662	45.556	1.110	0.930	0.248	0.449	0.724	3.203	2.130	13.226	NA	1.719
Production/Tech Office/Studio		1.549	26.500	0.646	0.541	0.145	0.261	0.421	1.863	1.239	7.694	0.582	NA

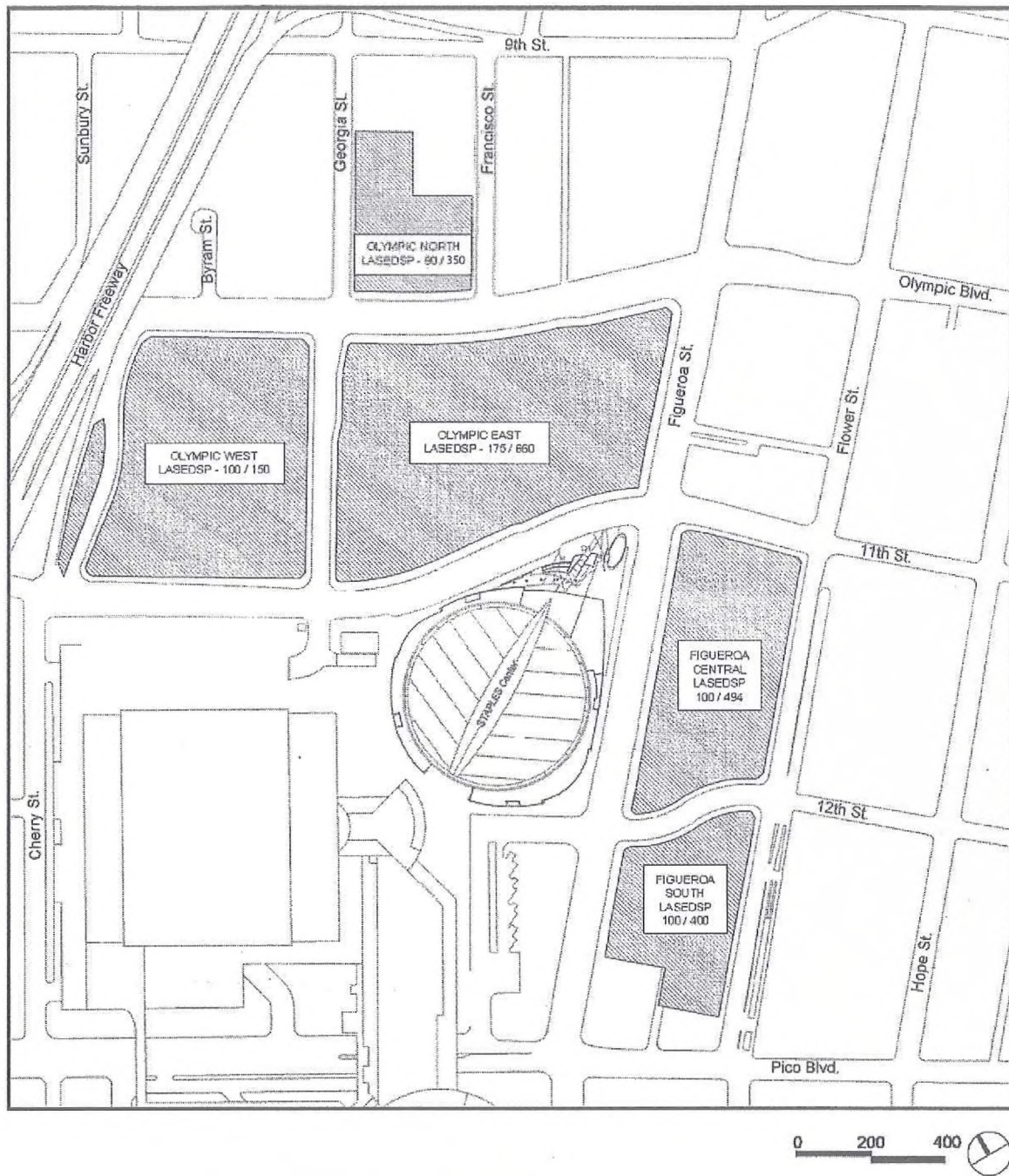
Sec. 6. Map 2 of Section 6 of the Los Angeles Sports and Entertainment District Specific Plan, Ordinance No. 174,224, as amended by Ordinance Nos. 178,134 and 179,413, is amended to read:



EXPANDED SPECIFIC PLAN AREA

MAP 2
SPECIFIC PLAN LAND USE MAP

Sec. 7. Map Nos. 3, 4, and 5 of Section 9 of the Los Angeles Sports and Entertainment District Specific Plan, Ordinance No. 174,224, as amended by Ordinance Nos. 178,134 and 179,413, are amended to read:



**MAP 3
SUBAREAS**





Sec. 8. Subsection A of Section 10 of the Los Angeles Sports and Entertainment District Specific Plan, Ordinance No. 174,224, as amended by Ordinance Nos. 178,134 and 179,413, is amended by changing all references to the word "Diagram" to "Exhibit."

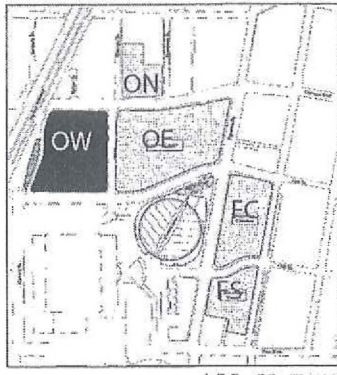
Sec. 9. Subdivision 3 of Subsection A of Section 10 of the Los Angeles Sports and Entertainment District Specific Plan, Ordinance Nos. 174,224, as amended by Ordinance No. 178,134 and 179,413, are amended to read:

3. Olympic North Subarea. The maximum permitted height and setback of any Project on a lot within the Olympic North Subarea, as shown on Map 3 and Exhibit 4a, shall be limited as follows:

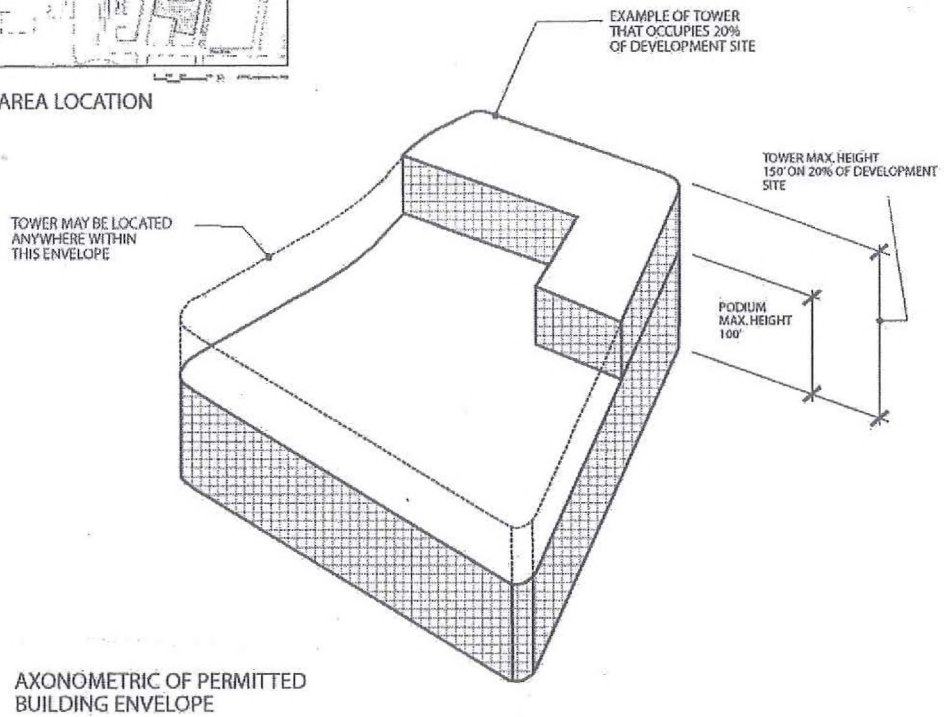
Podium Height: Podiums shall not exceed 90 feet in height.

Tower Height: Towers shall not exceed 350 feet in height; however the footprint of all Towers in this Subarea combined shall not exceed 60% of the total land within this Subarea.

Sec. 10. Exhibits 1, 2, 3, 4, and 4a of Subsection B of Section 10 of the Los Angeles Sports and Entertainment District Specific Plan, Ordinance No. 174,224, as amended by Ordinance Nos. 178,134 and 179,413, are amended to read:



SUB-AREA LOCATION



AXONOMETRIC OF PERMITTED BUILDING ENVELOPE

**EXHIBIT1
ALLOWABLE BUILDING HEIGHT & MASSING
OLYMPIC WEST SUBAERA**



SUB-AREA LOCATION

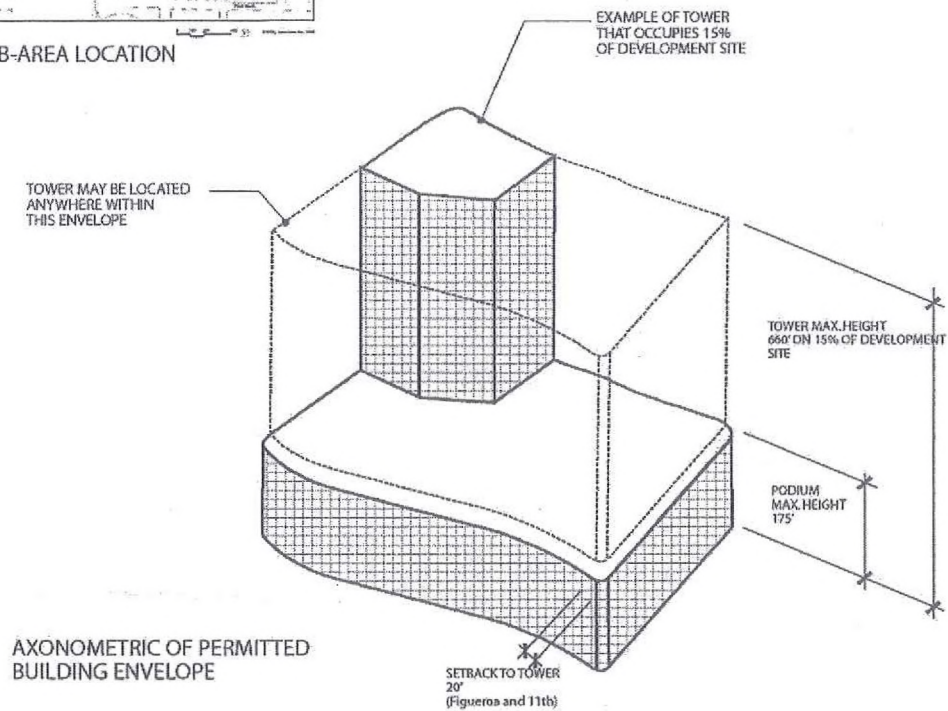
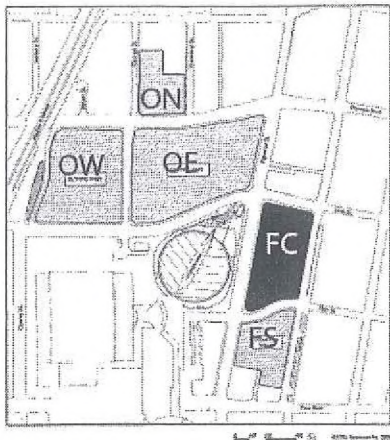
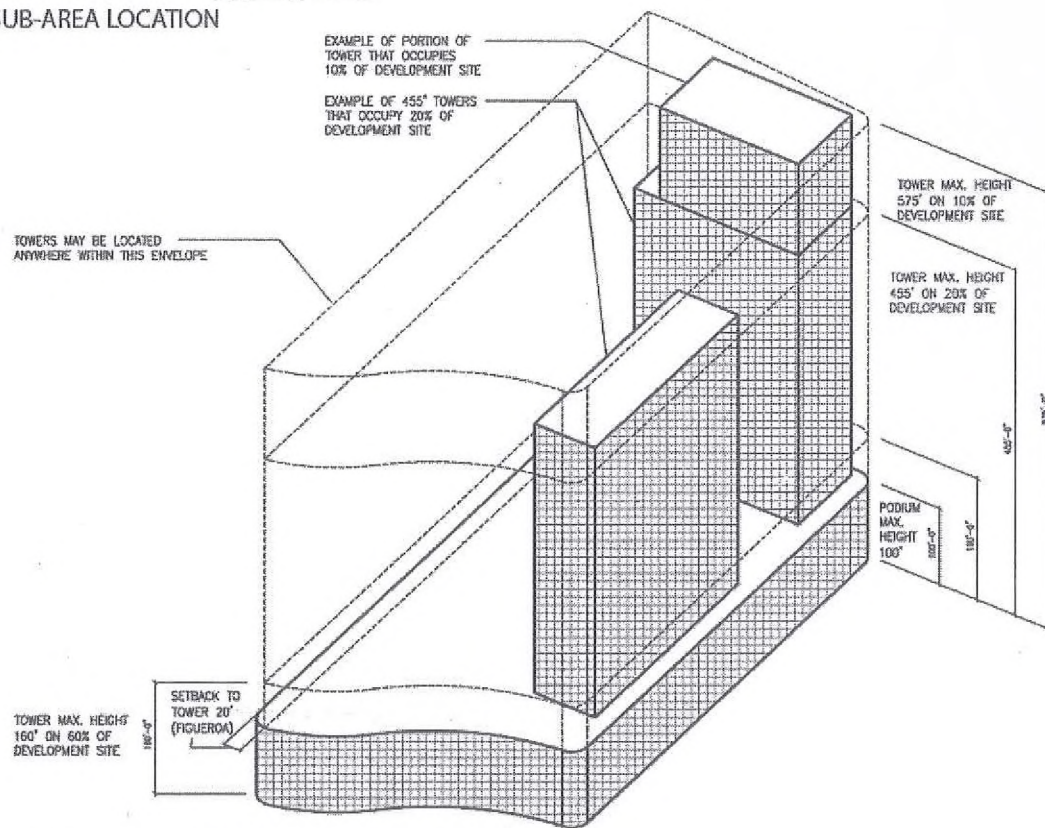


EXHIBIT 2
ALLOWABLE BUILDING HEIGHT & MASSING
OLYMPIC EAST SUBAREA

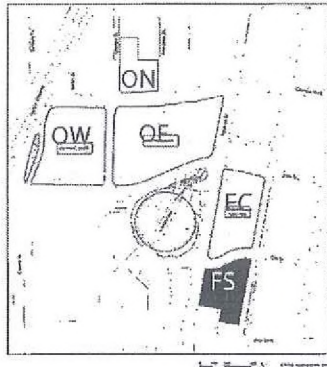


SUB-AREA LOCATION



AXONOMETRIC OF PERMITTED
BUILDING ENVELOPE

EXHIBIT3 ALLOWABLE BUILDING HEIGHT & MASSING FIGUEROA CENTRAL SUBAERA



SUB-AREA LOCATION

TOWER MAY BE LOCATED
ANYWHERE WITHIN
THIS ENVELOPE

SETBACK TO TOWER
20'
(Figueroa)

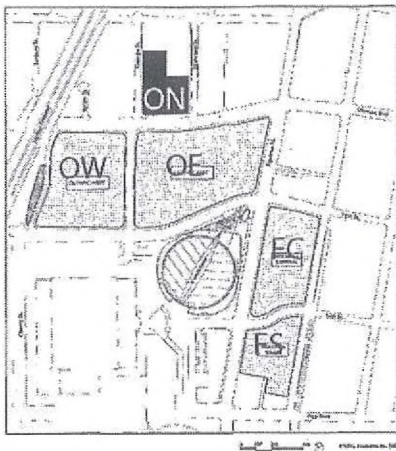
AXONOMETRIC OF PERMITTED
BUILDING ENVELOPE

EXAMPLE OF TOWER
THAT OCCUPIES 34%
OF DEVELOPMENT SITE

TOWER MAX HEIGHT
400' ON 34% OF
DEVELOPMENT SITE

PODIUM
MAX HEIGHT
100'

EXHIBIT4 ALLOWABLE BUILDING HEIGHT & MASSING FIGUEROA SOUTH SUBAERA



SUB-AREA LOCATION

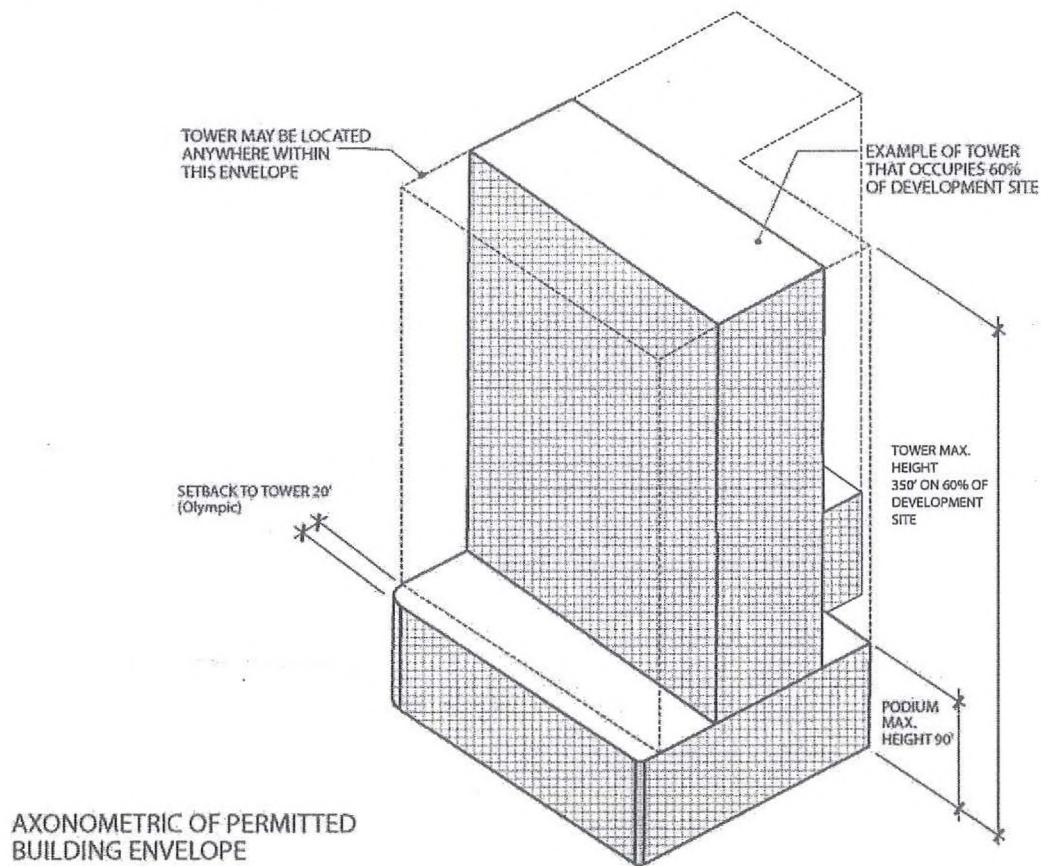
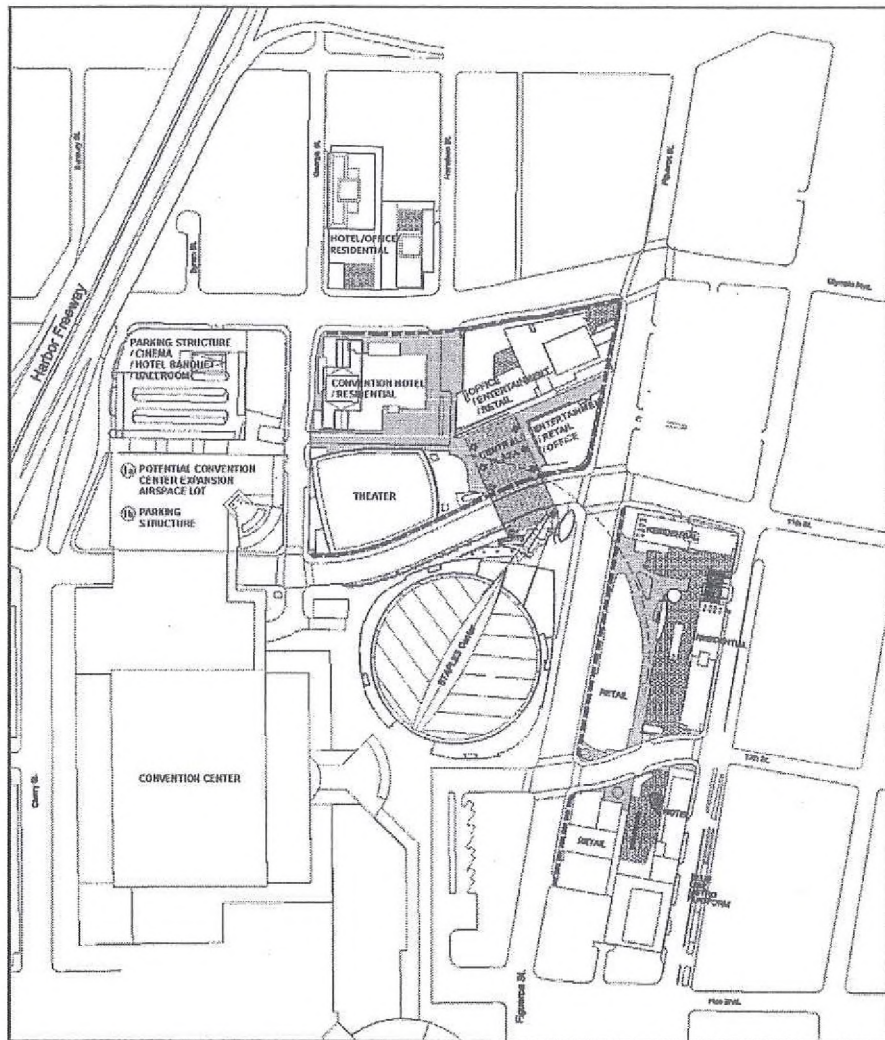






EXHIBIT4A
ALLOWABLE BUILDING HEIGHT & MASSING
OLYMPIC NORTH SUBAERA

Sec. 11. Map 6 of Subsection F of Section 10 of the Los Angeles Sports and Entertainment District Specific Plan, Ordinance No. 174,224, as amended by Ordinance Nos. 178,134 and 179,413, is amended to read:



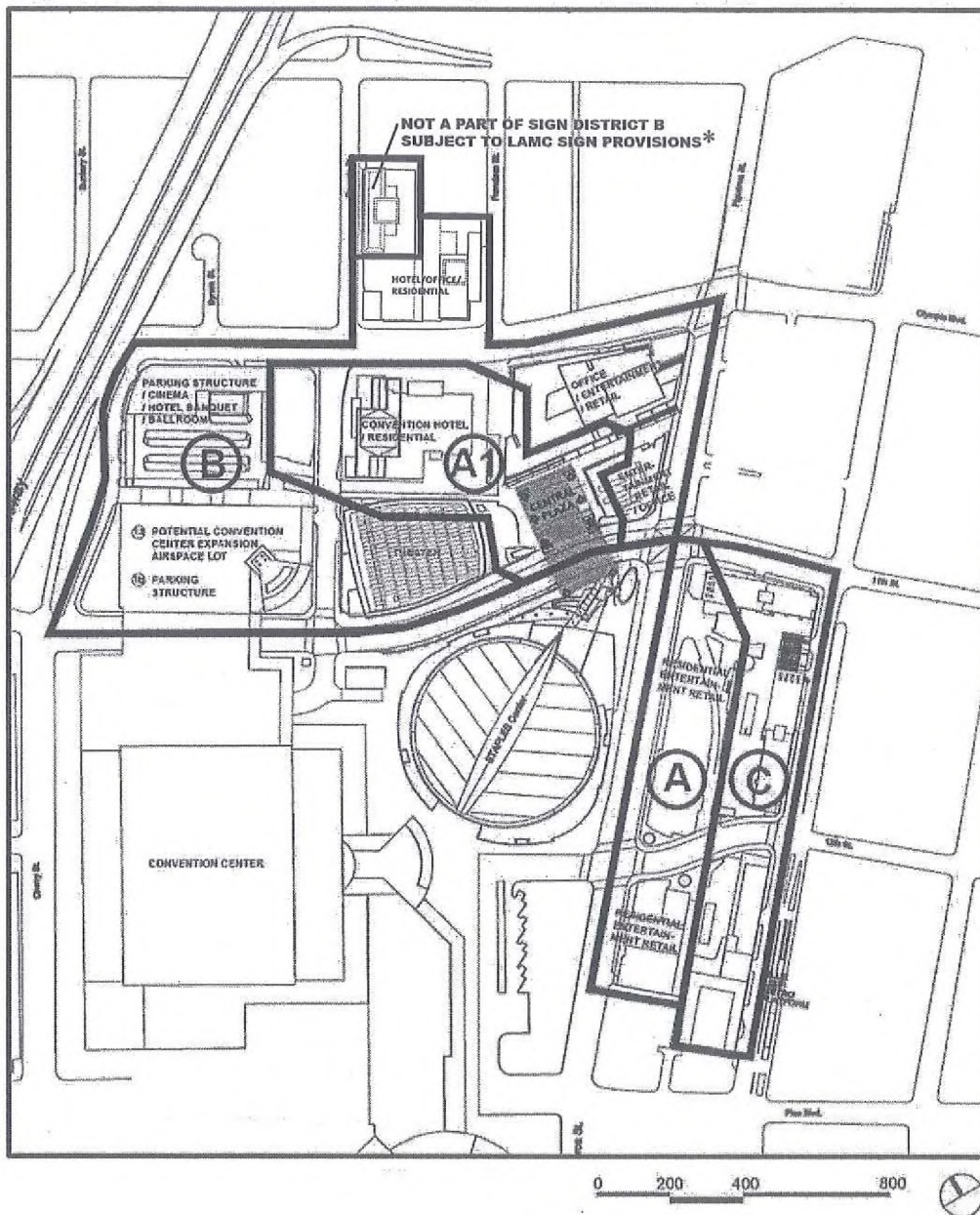
OPEN SPACE COMPONENTS

-  PLAZA / PASEO (94.9 KSF / 2.18 AC)
-  TERRACE (141.1 KSF / 3.23 AC)
-  PRIVATE SETBACK (25.8 KSF / 0.59 AC)
-  CENTRAL PLAZA (30.3 KSF / 0.70 AC)



MAP 6
GENERAL OPEN SPACE COMPONENTS

Sec. 12. Map 8 of Section 16 of the Los Angeles Sports and Entertainment District Specific Plan, Ordinance No. 174,224, as amended by Ordinance Nos. 178,134 and 179,413, is amended to read:



MAP 8
SIGN DISTRICTS

* Section 16, Signage, shall not apply to the four parcels described as Lots 20, 21, 22 and 23 as shown on F.J. Nettleton's Subdivision of the Ellis Tract. Thus, all applicable signage-related provisions of the Los Angeles Municipal Code shall apply to those four parcels, including but not limited to, Chapter I, Article 4.4; Chapter II, Article 8, Section 28.00, et seq.; Chapter VI, Article 7, Section 67.00, et seq.; and Chapter IX, Article 1, Division 62.

Sec. 13. Appendix B of the Los Angeles Sports and Entertainment District Specific Plan, Ordinance No. 174,224, as amended by Ordinance Nos. 178,134 and 179,413, is amended to read:

**APPENDIX B
TRIP GENERATION TABLE**

Land Use Type	Units	Inbound	Outbound	Total ¹
Hotel	Rooms	0.163	0.145	0.308
Live Theater	Seats	0.009	0.009	0.018
Entertainment	GSF	0.482	0.257	0.739
Museum	GSF	0.294	0.588	0.882
Restaurants	GSF	2.209	1.091	3.300
Retail	LSF	0.877	0.949	1.827
General Office	GSF	0.194	0.938	1.132
Residential	DU	0.156	0.100	0.256
Sports Broadcast Office	GSF	0.239	0.146	0.385
Cinemas	Seats	0.022	0.039	0.062
Convention Center Expansion	GSF	0.124	0.696	0.820
Production/Technical Office/Studio	GSF	0.142	0.355	0.477

Sec. 14. The City Clerk shall certify to the passage of this ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall; one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall East; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

I hereby certify that this ordinance was passed by the Council of the City of Los Angeles, at its meeting of _____.

JUNE LAGMAY, City Clerk

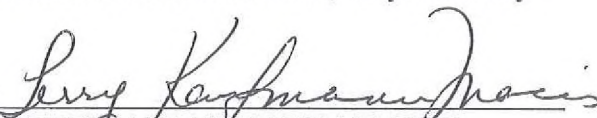
By _____ Deputy

Approved _____

Mayor

Approved as to Form and Legality

CARMEN A. TRUTANICH, City Attorney

By 
TERRY KAUFMANN-MACIAS
Assistant City Attorney

Date August 17, 2010

File No(s). Council File No. 09-3070

Pursuant to Charter Section 559, I **approve** this ordinance on behalf of the City Planning Commission and recommend that it be adopted

August 13, 2010

See attached report.


Michael LoGrande
Director of Planning

DEPARTMENT OF
CITY PLANNING
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
AND
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INFORMATION
www.planning.lacity.org

August 13, 2010

The Honorable Carmen A. Trutanich
City Attorney
200 North Main Street, 8th Floor
Los Angeles, CA 90012-4131

Attention: Terry Kaufmann-Macias
Assistant City Attorney

RE: Draft of Ordinance Amending the Los Angeles Sports and Entertainment District Specific Plan
Council File No: 09-3070 (not transmitted)
CPC File No: 2009-2677-SPA-ZC-DA (not transmitted)

Dear Mr. Trutanich:

At its meeting on November 12, 2009, the City Planning Commission approved a draft of an ordinance amending the Los Angeles Sports and Entertainment District Specific Plan to: allow the eventual development of approximately 332,618 square feet of general office uses and approximately 269,182 square feet of broadcasting studio and production uses, to be located in a 25-story building adjacent to Georgia Street. Development of approximately 206,500 square feet of hotel/ballroom uses, to include 275 hotel rooms; and approximately 89,250 square feet of residential uses, to include 65 residential dwelling units in a 25-story building adjacent to Francisco Street.

The subject draft of this ordinance is consistent with that as approved by the City Planning Commission on November 12, 2009.

Environmental Impact

The proposed ordinance will not create any new or result in any substantial increase in the severity of previously identified potentially significant impacts in any of the environmental impact categories, pursuant to the Addendum prepared to the adopted Environmental Impact Report ENV-20060-3577-EIR.

FINDINGS:

Specific Plan Amendment and Zone Change Findings

I. Findings under Charter Section 556: Conformance with the General Plan

Los Angeles City Charter Section 556 and LAMC Section 12.32(C)(7) require that prior to adopting a land use ordinance, such as a specific plan amendment and zone change, the City Council make findings that the ordinance is in substantial conformance with the purposes, intent and provisions of the General Plan. The Specific Plan Amendments to the Los Angeles Sports and Entertainment District (LASED) and the zone change to add the Olympic North Subarea into the Specific Plan are in substantial conformance with the purposes, intent and provisions of the General Plan in the following respects:

Central City Community Plan

The Specific Plan Amendments will promote the objectives, policies and goals of the Central City Community Plan and the Specific Plan by fostering the development of the LASED. Objectives 2-1, 2-2, 2-3 and 2-4 and Policy 2-4.1 of the Central City Community Plan, which are set forth below, seek to promote a mixed-use, 24-hour downtown environment, including retail, dining, entertainment, night clubs, theatres and hotels that will foster the development of residential uses, business, conventions, trade shows and tourism.

- Objective 2-1 To improve Central City's competitiveness as a location for offices, business, retail and industry.
- Objective 2-2 To retain the existing retail base in Central City.
- Objective 2-3 To promote land uses in Central City that will address the needs of all the visitors to Downtown for business, conventions, trade shows, and tourism.
- Objective 2-4 To encourage a mix of uses which create an active, 24-hour downtown environment for current residents and which would also foster increased tourism.
- Policy 2-4.1 Promote night life activity by encouraging restaurants, pubs, night clubs, small theaters, and other specialty uses to reinforce existing pockets of activity.

The Community Plan identifies the LASED as the program for implementing each of these objectives and policies. In addition, the purposes of the Specific Plan include providing "continued and expanded development of the site as a major entertainment/mixed use development", expanding the economic base of the City, and enhancing "the existing Convention Center and Staples Center development.

The proposed amendment to the Specific Plan is intended to allow for the simultaneous development of the Olympic North subarea with a facility for broadcast, production and office uses and a separate hotel and residential tower. The amendment would allow for the geographic expansion of this subarea by four parcels; an increase in the floor area allowed at the subarea; an increase in the building height allowed at the subarea; and the introduction of broadcast, production and office land uses. The result of this more intensive use of the Olympic North subarea is the provision of a broader mix of land uses that will more fully achieve the objectives of the Specific Plan and the Central City Community Plan.

The Project proposes to establish a new office building in Downtown Los Angeles, with the capacity and specifications designed to host a major entertainment studio and production company, which would include more production studio and broadcasting space than any existing location in the Central City Area. These uses would be critical in increasing Central City's competitiveness as a location for the entertainment industry and associated businesses and uses. Locating such entertainment office, broadcasting and production studio uses within the LASED and near established uses such as the Grammy Museum and Staples Center will contribute to the identity of the LASED as a premier location for the entertainment industry and associated uses. The inclusion of additional office uses in the Plan Area also would build upon other successful office uses already existing within the LASED, including ESPN's broadcasting studios. Furthermore, the inclusion of additional office uses in the Plan Area will bring a greater number of day-time uses to the district consistent with the goal of creating an active 24-hour district.

Expansion of the Olympic North Subarea to include parcels located to the north, adjacent to Francisco Street is necessary to accommodate the design of the hotel and residential tower that the Specific Plan identifies for the Olympic North site and ensure that the proposed office and hotel/condominium buildings are built pursuant to consistent design standards and guidelines. The proposed hotel, in conjunction with the already approved Ritz-Carlton/Marriott Hotel located on the Olympic East Subarea of the LASED, will provide needed support and accommodations for tourists, Convention Center patrons and LASED guests. The proposed hotel will be located in easy walking distance of LA Live, Staples Center and the Convention Center, thereby further integrating the LASED and greater Downtown area as an integrated, pedestrian-friendly environment. The inclusion of another first-class hotel within the Downtown area located near the Convention Center will increase the attractiveness of the Convention Center as a site for national conventions and trade shows.

The Specific Plan Amendments also would further the goals of the LASED and the Central City Community Plan to improve the performance of the Convention Center and to promote the development of business, conventions, trade shows and tourism in downtown by solidifying the Plan Area's identity as an entertainment district through the provision of broadcast, production and office uses.

The Specific Plan Amendments and zone change also would allow for development of an office building on the Olympic North Subarea. As described above, the LASED has been largely developed with uses that are oriented towards peak weekend and nighttime activity, including restaurant, nightclub, live theater and cinema uses. These uses, in conjunction with the Staples Center, have succeeded in creating a vibrant center of activity during nights and weekends. In addition to authorizing additional office floor area, the Specific Plan amendments would transfer unused floor area associated with hotel and residential uses on Development Sites 1 and 2 and some hotel and residential floor area originally proposed for the Olympic North Subarea to the proposed office uses. The intent of this change is to balance the existing uses with additional office and broadcasting/production uses, which are oriented towards weekday activity, to create a truly active 24-hour downtown environment. The additional office and broadcasting/production uses proposed for the Project would take advantage of parking located in the LASED which is largely underutilized during the daytime as the majority of LA Live parking is primarily used for the existing nighttime and weekend activities. As further described in the proposed Addendum to the EIR, because the proposed Project would provide additional weekday daytime uses, which are currently only a small portion of LASED uses, the amended Specific Plan would not result in a substantial increase in peak hour vehicular trips or parking demand or increase weekday peak trip generation beyond that analyzed in the EIR.

The proposed office and broadcasting/production uses also would support existing restaurants and retail in the area, thereby helping to retain the existing retail base in Central City.

Employees and visitors to the proposed office building would be located near a variety of restaurant and retail options in and around the LASED and would increase patronage to such uses. These employees would provide needed daytime revenue to complement the business currently generated by the other LASED uses that are primarily oriented towards nighttime activities.

General Plan Framework

The General Plan Framework, adopted in December 1996, provides current guidance on land use issues for the entire City. The entire area that would be included within the amended Specific Plan area is located within an area designated as Downtown Center on the General Plan Framework. Land Uses encouraged within the Downtown Center include major visitor and convention facilities, corporate and professional offices, offices, telecommunications centers, hotels and major cultural and entertainment facilities. The Downtown Center is defined as "the principal government and business center in the region, with a worldwide market. It is intended to be the highest density center of the City and hub of regional transportation." (General Plan Framework Element Executive Summary.) "It is the largest government center in the region and the location for major cultural and entertainment facilities, hotels, high-rise towers, regional transportation facilities and the Convention Center." (General Plan Framework Element, Ch. 3.) Generally the Downtown Center is characterized by Floor Area Ratios up to 13:1 and high-rise buildings.

The Specific Plan Amendments and zone change further the objectives and features of the General Plan Framework, particularly as they relate to land use and economic development. Objective 3.11 of the General Plan Framework provides for "the continuation and expansion of government, business, cultural, entertainment, visitor-serving, housing, industries, transportation, supporting uses, and similar functions at a scale and intensity that distinguishes and uniquely identifies the Downtown Center." Similarly, Policy 7.3.1 of the General Plan Framework seeks to "maintain the Downtown regional core as the preeminent center for office development in the City, the metropolitan area, and the region. Maintenance of this status is key to the City's economic and fiscal strength during the transition to a more service oriented economy."

The Specific Plan Amendments, zone change, and overall Project facilitated by such changes, would further establish the Downtown Center as the primary center of cultural, entertainment and office uses. Expansion of the Olympic North Subarea would facilitate development of a significant office building, designed for entertainment office, media production and broadcasting studios; thereby increasing the presence of the entertainment industry within the Downtown Center and further integrating the area with the sports and entertainment uses that already exist in the LASED. As the proposed office development would be integrated into the larger mixed-use LASED development, it would also further Policy 7.2.6 of the General Plan Framework, which encourages development of office uses in regional, mixed-use centers.

The Specific Plan Amendments and zone change also further several stated objectives of the Specific Plan and EIR. The EIR objectives include providing "a land use plan and development standards that ensure future Project success by creating a Project identity and by increasing downtown employment and housing opportunities." (EIR, at 35.) The Specific Plan includes a similar objective to "expand the economic base of the City, by providing additional employment opportunities and additional revenues to the region." (Specific Plan § 2.) The Revised Project furthers these objectives by expanding upon existing LASED employment opportunities through introducing additional office and production/studio uses, thereby creating new employment opportunities in the Specific Plan area and Downtown Los Angeles. The Revised Plan also "implements a site plan that optimizes the synergy among the on-site uses." (EIR, at 35.) As discussed above, the Revised Project would allow for increased daytime uses, which would further support existing LASED restaurant and retail options. Moreover, the Revised Project is

consistent with the Specific Plan purpose of ensuring adequate parking "through the use of shared parking." (Specific Plan § 2.) Consistent with EIR objectives, the Revised Project would provide opportunities to use shared parking to maximize efficient parking, with the proposed office uses using LASED parking during daytime hours and existing LASED uses generating most of the nighttime and weekend parking demand.

The Specific Plan Amendments also would facilitate an improved site plan for the proposed hotel on the Olympic North Subarea, which would supply needed support and accommodations for the Convention Center and patrons of the Staples Center and LA Live. The proposed hotel, in conjunction with the Ritz-Carlton/Marriott Hotel, would allow Los Angeles to successfully compete for regional, state and national meetings and conventions, increasing the number of events held in Los Angeles and ensuring the continued strength of the Downtown Center as a center for tourism and economic activity in the greater Los Angeles area.

Development of a first-class hotel and broadcasting/office building would stimulate additional economic activity in the area, resulting in increased employment opportunities for local residents, increased revenue to the City and heightened use of Convention Center and Staples Center facilities. The employment opportunities generated by the Specific Plan Amendments are likely to be distributed across a wide variety of office, hotel, restaurant and retail uses, as well as short-term construction, and would cover a broad spectrum of income levels, in accordance with the City's goals. Moreover, the local hiring program that would apply to the entire amended Specific Plan area would result in many of these jobs being filled by people from local neighborhoods, including South Park, Pico Union and the areas to the south of the LASED. The office uses will also further support existing LASED uses, including retail and restaurant uses, as employees and visitors would likely increase patronage to these uses during daytime hours.

Transportation Element

The Specific Plan Amendments and corresponding zone change are consistent with the applicable objectives and policies of the Transportation Element, including Objective 3, related to supporting development in regional centers, major economic activity areas and along mixed-use boulevards. With the adoption of the requested amendments, the Project would be located entirely in the LASED, which is a mixed-use district designated as a regional center by the General Plan. The development of office uses near residential uses and a major entertainment and retail center constitutes "smart growth" planning, where people are encouraged to live, work, shop and seek entertainment in the same area without driving to other areas. Further, the Project would not result in significant new traffic impacts, as the vast majority of additional trips would be generated during weekday hours, rather than the peak weekend PM hours when traffic generated by the LASED and surrounding area is at its highest. As further described in the proposed Addendum to the EIR, the Specific Plan Amendments and zone change will not result in any significant transportation, parking or circulation issues not analyzed in the EIR.

II. Findings under Charter Section 558

Los Angeles City Charter Section 558 and LAMC Section 12.32.C.7 require that prior to adopting a land use ordinance, the City Council must make findings that the ordinance conforms with public necessity, convenience, general welfare and good zoning practice. The Specific Plan Amendments and the LASED Specific Plan zone change for the Olympic North Subarea conform to public necessity, convenience, general welfare and good zoning practice in the following respects:

The expansion of the Olympic North Subarea of the LASED Specific Plan area conforms to the public necessity, general welfare and good zoning practice by fostering a unified development and consistent standards and regulations throughout the project site and existing Specific Plan

area. All uses proposed by the Specific Plan Amendments are allowed within the Specific Plan area. Incorporating the entire project site into the Specific Plan area would ensure conformance with the development parameters and design guidelines of the Specific Plan and facilitate a unified development for the Olympic North Subarea. Moreover, it would facilitate development of an office building on the Subarea. As most existing LASED uses are oriented towards nighttime and weekend uses, the additional office, broadcasting, and production studio uses would serve to further the Specific Plan's goals of creating an active 24-hour, 7 day district. The additional uses proposed for the Project would take advantage of parking located in the LASED which is under-utilized during the daytime, as the majority of LA Live parking is used primarily for the existing nighttime and weekend activities. As further described in the proposed Addendum to the EIR, because the Project would be focused on additional daytime uses, it would not result in a significant increase in peak hour vehicular trips or parking demand or increase weekday peak trip generation beyond that analyzed in the EIR. The proposed office, broadcasting and production studio uses would also compliment existing LASED uses, including restaurants and retail uses, during daytime hours. The additional height proposed by the Specific Plan Amendments is within the range allowed on other LASED subareas, including the Olympic East Subarea (660 foot maximum), the Figueroa Central Subarea (575 foot maximum) and the Figueroa South Subarea (400 foot maximum). It is also consistent with the overall design of Downtown, where most office uses are located in high-rise buildings.

The Project is also consistent with the intent of the Specific Plan to allow the proposed uses designated in a certain subarea to shift over time in response to market conditions. (See Specific Plan §.6 (allowing "development flexibility by permitting shifts of permitted Floor Area between certain land uses over the life of the Specific Plan").) Due to changes in market conditions, the proposed uses for the Olympic North Subarea have shifted to include a reduced hotel/condominium building consistent with projected area demand for such uses. The remaining floor area, as well as unused floor area from other Specific Plan Development Sites, would be used to develop the office, broadcasting and production studio uses to provide efficient use of the Olympic North Subarea and associated parking.

Locating additional office uses within the Specific Plan area also promotes pedestrian activity and the reduction of vehicular trips and vehicle miles traveled. Locating office uses near existing residential developments and mass transit locations represents "smart growth," as it encourages employees and residents to live and work within the same area, thereby reducing commuter traffic. The LASED facilitates this form of smart growth, as the proposed office uses would be located within easy walking distance of residential uses located in the Olympic North, Olympic East, Figueroa Central and Figueroa South Subareas. Olympic North residents and employees could also enjoy the various existing LASED entertainment, restaurant and retail options without using a car. Further, as the proposed office uses would be located near several bus stops and the Metro Blue Line and Expo Line light rail line, employees could easily commute to work using existing mass transit options.

The Project site plan also appropriately balances development of the Olympic North Subarea. The two proposed towers are spaced apart on the Project Site, located at the northwest and southeast corners, to maximize views from the towers and promote efficient flow of pedestrians and vehicles. The proposed overall massing and height of the Olympic North Subarea provides an appropriate transition from the larger development and height allowed on the Olympic East Subarea and the commercial buildings located outside of the LASED area to the north, west and east of the Olympic North Subarea.

Development Agreement Amendment Findings

- III. In connection with the amendment to the Third Amended and Restated Development Agreement it is hereby found as follows:**

- A. That a Third Amended and Restated Development Agreement by and among the City of Los Angeles ("City"), a municipal corporation, L.A. Arena Land Company, LLC ("LandCo"), Flower Holdings, LLC, Olympic and Georgia Partners, LLC, LA Live Theatre, LLC, LA Live Properties, LLC, FIDM Residential, Inc., Figueroa South Land, LLC, and Fig Central Fee Owner, LLC was entered into on April 2, 2008 and recorded on April 10, 2008 in the Official Records of Los Angeles County, California as Instrument No. 20080625541 (the "Development Agreement") after adoption by the City Council as Ordinance No. 179,414 on November 30, 2007.
- B. That State Government Code Section 65868 authorizes the amendment of a previously approved development agreement.
- C. That LandCo requested that the City consider amending and restating the Development Agreement in accordance with the Fourth Amended and Restated Development Agreement (the "Amended Agreement"). The amendment process was initiated by the Applicant, and all proceedings have been taken in accordance with the City's adopted procedures.
- D. That the Amended Agreement complies with all applicable City and State regulations governing development agreements.
- E. That, pursuant to Section 65867.5 of the Government Code, the Amended Agreement is consistent with the objectives, policies and programs specified in the City of Los Angeles General Plan, including the Central City Community Plan (the "Community Plan") and the Los Angeles Sports and Entertainment District Specific Plan (the "Specific Plan"). The Amended Agreement is consistent with the General Plan and Specific Plan in that it conforms the Development Agreement to the amendments to the Specific Plan sought concurrently herewith, including expansion of the Olympic North Subarea to include additional parcels and floor area. The Amended Agreement would permit construction of a new state-of-the-art office building in Downtown Los Angeles, with the capacity and specifications to host a major entertainment studio and production company, thereby increasing Central City's competitiveness as a location for the entertainment industry and associated businesses and uses. Locating such entertainment office, broadcasting and production studio uses within the Los Angeles Sports and Entertainment District ("LASED") and near established uses such as the Grammy Museum and Staples Center will also contribute to the identity of Central City as a premier location for the entertainment industry and associated uses. The Amended Agreement therefore furthers the Community Plan's objective of improving Central City's competitiveness as a location for offices, business, retail and industry. The Amended Agreement would also provide for the expansion of the Olympic North Subarea, which is necessary to accommodate the design of the hotel and condominium building that the Specific Plan identifies for the Olympic North site. The Olympic North hotel, in conjunction with the already approved Ritz-Carlton/Marriott Hotel located on the Olympic East Subarea of the LASED, will provide needed support and accommodations for tourists, Convention Center patrons and LASED guests. Therefore, the Amended Agreement furthers the General Plan and Community Plan objectives of promoting land uses in the Central City that address the needs of all visitors to Downtown for business, conventions and tourism, as well as continuing the expansion of cultural, entertainment and visitor-serving uses that distinguish and uniquely identify the Downtown Center. The Amended Agreement leaves unchanged the obligations and public requirements under the Development Agreement. The additional development approved by the Amended Agreement would also result in an expansion of the public benefits contemplated under the Development Agreement, including expansion of the living wage program and local hiring program.

- F. That the Amended Agreement will not be detrimental to the public health, safety and general welfare. Approval of the Amended Agreement conforms the Development Agreement to the amendments of the Specific Plan, sought concurrently herewith. In addition, the Amended Agreement will not modify those provisions of the Development Agreement which specifically permit application to the Project of rules and regulations under City Municipal Code relating to public health and safety. The Olympic North hotel permitted by the Amended Agreement will be located in easy walking distance of LA Live, Staples Center and the Convention Center, thereby further integrating the LASED and greater Downtown area as an integrated, pedestrian-friendly environment. Development of a first-class hotel and broadcasting/office building would stimulate additional economic activity in the area, resulting in increased employment opportunities for local residents. The employment opportunities generated by the Amended Agreement are likely to be distributed across a wide variety of office, hotel, restaurant and retail uses, as well as short-term construction, and would cover a broad spectrum of income levels, in accordance with the City's goals. Moreover, the local hiring program that would apply to the entire Amended Agreement area would result in many of these jobs being filled by people from local neighborhoods. The Amended Agreement will also contribute to the success of the Convention Center and LA Live, thereby promoting the general welfare. As described in greater detail in the Addendum to the Los Angeles Sports and Entertainment Complex EIR prepared in connection with the Amended Agreement, these amendments would not result in any new significant environmental impacts or substantially increase any previously identified significant environmental impacts.
- G. That the Amended Agreement will promote the orderly development of the subject property in accordance with good land use practice. The Amended Agreement merely conforms the Development Agreement to the modifications to the Specific Plan sought concurrently herewith. The Los Angeles Sports and Entertainment District has largely been developed with uses that are oriented towards peak weekend and nighttime activity, including restaurant, nightclub, live theater, and entertainment uses. The Amended Agreement would permit the development of office, broadcasting and production studio uses on the Olympic North Subarea, thereby balancing the existing uses with additional office uses oriented towards weekday activity, to create a truly active 24/7 downtown district originally contemplated under the Community Plan and Specific Plan. The proposed uses would also support existing restaurants and retail in the area, thereby helping to retain the existing retail base in Central City. Employees and visitors to the proposed office building would be located near a variety of restaurant and retail options in and around the LASED and would increase patronage to such uses. Further, as the Amended Agreement would allow additional uses oriented primarily towards weekday activities, such uses would take advantage of LASED parking which is currently underutilized during off-peak weekday hours. The Amended Agreement would thus promote the orderly development of the Project in accordance with good land use practice.
- H. That the Amended Agreement is necessary to strengthen the public planning process and to reduce the costs of development uncertainty.
- I. That the Amended Agreement is consistent with the conditions of previous discretionary approvals for the subject development, as well as with concurrently requested approvals.
- J. That, based on the above findings, the Amended Agreement is deemed consistent with public necessity, convenience, general welfare, and good zoning practice.

Statement of Environmental Effects and Findings

IV. Statement of Environmental Effects and Findings Introduction

Description of the Approved Project

The Final Environmental Impact Report ("EIR") for the Los Angeles Sports and Entertainment District ("LASED") (SCH #2000091046) was certified by the City of Los Angeles on September 4, 2001. The EIR analyzed a 4.0 million square foot conceptual development program for the LASED. The LASED is comprised of approximately 27.1 acres over all or portions of six city blocks in the southwest section of downtown Los Angeles, approximately 1.5 miles southwest of Los Angeles City Hall, and 0.5 miles northeast of the Santa Monica Freeway (I-10) and Harbor Freeway (I-110) interchange. Generally, the development areas that make up the LASED are located east and west of Figueroa Street, at Olympic Boulevard on the north and almost to Pico Boulevard on the south, and one partial block north of Olympic Boulevard between Francisco Street and Georgia Street. The LASED currently consists of the following two components: (1) the LASED Specific Plan (which covers five of the LASED's six city blocks), and (2) development on a portion of one City block not included within the LASED Specific Plan area but included within the Development Agreement area (the Figueroa North Subarea).

In the years since the certification of the EIR, the conceptual development program for the LASED has undergone modifications in response to changing market conditions. In accordance with two Specific Plan Amendments, approval of two Vesting Tentative Tract Maps, 10 project approvals for various parts of the Approved Project and associated subsequent addenda to the certified EIR, the Approved Project consists of a maximum of 5,515,101 square feet of total development within the LASED Specific Plan area and 462,705 square feet of development on the Figueroa North Subarea (included in the Development Agreement Area, but not the LASED Specific Plan), for a total of 5,977,806 square feet within the EIR project area. The Approved Project includes a variety of permitted uses within the LASED area, including cinemas; hotel and ballroom; office; residential; retail; restaurant; entertainment; sports broadcast office; live theater; museum; motion picture, television or broadcast studio; and Los Angeles Convention Center uses. The Olympic North Subarea, located within the LASED Specific Plan area permits a maximum of 400 hotel rooms (500,000 square feet of hotel and ballroom uses) and 100 residential units (150,000 square feet). As set forth in the LASED Specific Plan, allowable building heights are defined in terms of podium height (i.e., the height that applies to the entire subarea) and a tower height (i.e. the maximum height permitted within the subarea). The maximum permitted podium height for the Olympic North Subarea is 90 feet above grade and the maximum permitted tower height is 200 feet above grade. The Approved Project also includes a maximum of 1,080 hotel rooms (862,000 square feet of hotel and ballroom uses) and 225 residential units (504,000 square feet) permitted for Development Site 2. Development Site 1 contains a maximum of 127,327 square feet of cinema uses and 203,526 square feet of hotel and ballroom uses. Accordingly, all references within the Addendum and these findings to the currently entitled Project (the "Approved Project") reflect conditions inclusive of the above approvals and modifications.

Description of the Revised Project

The Applicant is proposing amendments to the LASED Specific Plan to balance the existing LASED uses with additional office uses, which are oriented towards weekday activity, to create a truly active 24-hour downtown environment and support existing LASED restaurant and retail uses. The Revised Project achieves this goal by proposing modifications to the Olympic North Subarea. No changes are proposed for any other portion of the LASED other than reducing the maximum allowed development in some areas to accommodate the increased floor area permitted in the Olympic North Subarea. The Revised Project includes the following modifications to the Development Agreement Approved Project: (1) increasing the maximum allowable development within the LASED area (as analyzed by the EIR) from 5,977,806 square feet to 6,290,018 square feet (as noted above, the Figueroa North property, with 462,705

square feet of floor area, is not within the LASED Specific Plan area, but is covered by both the EIR and the Development Agreement); (2) increasing the maximum permitted allowable development within the LASED Specific Plan area from 5,515,101 square feet to 5,827,313 square feet; (3) increasing the maximum allowable development on the Olympic North Subarea from 500,000 square feet to 897,550 square feet; (4) increasing the size of the Olympic North Subarea from 1.48 acres to 2.17 acres, which in turn increases the acreage within the LASED Specific Plan area from 25.28 acres to 25.97 acres; (5) increasing the maximum allowable tower height in the Olympic North Subarea from 200 feet to 350 feet above grade; (6) providing for office and studio/production uses in the Olympic North Subarea; (7) decreasing the maximum allowable development on Development Site 1 from 330,853 square feet to 297,492 square feet; (8) decreasing the maximum allowable development on Development Site 2 from 1,366,000 square feet to 1,308,170 square feet; and (9) zoning the expanded portion of the Olympic North Subarea as LASED. The Applicant is also seeking certain corresponding amendments to the previously approved LASED Development Agreement and an Implementation Agreement to the LASED Disposition and Development Agreement. The Specific Plan Amendment and these corresponding amendments to previously approved agreements are referred to herein as the "Project Approvals". The changes to the Approved Project (i.e., the proposed Specific Plan Amendment) are referred to herein as the "Revised Project".

Based upon the above changes to the overall LASED Specific Plan development, the Revised Project would include a maximum of 601,800 square feet of office uses (consisting of 332,618 square feet of general office uses and 269,182 square feet of broadcasting/production studio uses), 275 hotel rooms (206,500 square feet of hotel and ballroom uses) and 65 residential units (89,250 square feet) in the Olympic North Subarea; thereby reducing the amount of proposed hotel and residential development permitted in the Olympic North Subarea to balance the uses in the Subarea with both daytime and nighttime activities. To further reduce the impact of the additional development proposed in the Olympic North Subarea, the development permitted on Development Site 1 in the Olympic West Subarea and Development Site 2 in the Olympic East Subarea would be reduced. Consistent with the development approved in the Marriott Hotel Conference Center Project Permit Compliance Review ("PPCR"), the Revised Project would reduce the maximum permitted floor area for hotel and ballroom uses on Development Site 1 from 203,526 square feet to 170,165 square feet. The maximum permitted development on Development Site 2 would be reduced from 1,080 hotel rooms (862,000 square feet of hotel and ballroom uses) and 225 residential units (504,000 square feet) to 1,001 hotel rooms (805,065 square feet of hotel and ballroom uses) and 224 residential units (503,105 square feet).

As the physical configuration of the land uses, amount of commercial development and scope of the LASED Specific Plan area proposed in the Revised Project differs from the conceptual development program analyzed in the EIR, as amended by the aforementioned and subsequent entitlement actions and environmental analysis, additional environmental review under CEQA is required for the Revised Project. The Addendum analyzed the proposed changes due to the Revised Project to determine whether any significant environmental impacts, which were not identified in the EIR and subsequent addenda, would result or whether previously identified significant impacts would be substantially more severe. As demonstrated in the Addendum, the Revised Project would not result in any new significant impacts or substantial increase in the severity of previously identified impacts. Therefore, it is appropriate under CEQA to prepare an addendum for the Revised Project. State CEQA Guidelines Section 15164 requires that a "brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record." Below is a summary of the findings required under Section 15164, which summarizes the analysis contained in the Addendum.

V. Land Use

Approved Project Impacts

The Approved Project would develop the individual subareas of the LASED with floor area ratios (FARs) between 1.92 and 7.77. Under the Approved Project, three of the LASED Specific Plan area's subareas are above the maximum 6.0 FAR allowed by the Los Angeles Municipal Code ("LAMC"). However, the Central City Community Plan states that the LASED Specific Plan area may exceed the 6:1 FAR limitation and develop at a maximum FAR of up to 13:1 pursuant to the transfer of floor area provisions of the LASED Specific Plan. The EIR included an analysis of consistency with applicable plans and LAMC provision. The PPCR approvals for individual development projects and two subsequent Addendums approved since certification of the EIR confirm that the Approved Project is consistent with the EIR and thus do not alter the EIR's conclusions regarding consistency with applicable plans and the LAMC. The Approved Project is also consistent with the goals and policies set forth in the City of Los Angeles General Plan. With regard to land use compatibility, it has been concluded that the Approved Project would combine with existing adjacent land uses to create a well-designed, modern, efficient and balanced urban environment, intended to provide a full range of day and nighttime activities and uses. Based on the findings of the EIR and subsequent environmental documentation, no significant impacts regarding land use compatibility would occur with the Approved Project.

Revised Project Impacts

Under the Revised Project, the maximum amount of permitted development within the LASED Specific Plan area would increase from 5,515,101 square feet to 5,827,313 square feet and the maximum amount of permitted development on the Olympic North Subarea would increase from 500,000 square feet to 897,550 square feet. As two of the approved projects within the LASED Specific Plan area did not realize the maximum permitted development on their respective subareas, the Revised Project would also modify the amount of development that has occurred pursuant to all currently approved entitlements within the LASED. Specifically, the Specific Plan area would be modified to: (1) reduce the hotel uses from 1,702 rooms (1,622,902 square feet) to 1,498 rooms (1,389,106 square feet) and (2) reduce residential uses from 1,833 residential units (2,485,439 square feet) to 1,797 residential units (2,423,794 square feet).

Through refinement of plans for the Olympic North Subarea to support an active mixed-use development that balances day and night uses and maximizes parking efficiency within the LASED, the Revised Project would accommodate both a smaller hotel and condominium development and an additional broadcasting/production and general office development in a manner that creates a more synergistic site plan for the Subarea. The inclusion of additional broadcast/production and office uses would further compliment existing LASED uses though expanding the weekday uses in the LASED, which is currently developed with uses that are generally oriented towards nighttime and weekend activity, such as the LASED live theater, cinema, restaurant and entertainment uses. Additional broadcasting/production and office development would therefore further the goals of the Specific Plan to create a mixed use 24-hour, seven days a week district with minimal effect on traffic and parking demands at the LASED's peak times, which generally occur on weekends. The additional office uses would also provide support for the existing LASED uses, including restaurant and retail uses, as additional daytime employment within the LASED would likely increase the patronage of such uses. The proposed office uses would also compliment other areas surrounding the Olympic North Subarea, which are all zoned for commercial uses or are part of the LASED Specific Plan area.

The Revised Project also furthers several stated objectives of the Specific Plan and EIR, including the goals of increasing downtown employment and expanding the economic base of the City. The Revised Project furthers these objectives by expanding upon existing LASED employment opportunities through introducing additional office and production/studio uses,

thereby creating new employment opportunities within the LASED area and Downtown Los Angeles. Similar to the Approved Project, the Revised Project would be consistent with the policies and objectives of the General Plan and Central City Community Plan, Central Business District Redevelopment Plan, Downtown Strategic Plan, South Park Development Strategies and Design Guidelines, Figueroa Corridor Economic Development Strategy, and LASED Specific Plan.

Overall, the Revised Project reflects a continuation of the types of development already anticipated to occur within the LASED and would not introduce any uses not already permitted within the LASED Specific Plan area. With regard to the increase in office development under the Revised Project, a substantial amount of office uses is already included in the Approved Project and the increase in office floor area reinforces the positive diversity of land uses that occur within, as well as around, the LASED. The development of office uses was previously analyzed in the EIR and it was concluded that the Approved Project would result in a less than significant impact with regard to land use compatibility, although the office uses were subsequently removed from the Olympic North Subarea in lieu of hotel and residential uses in the August 2006 Addendum to the EIR. Thus, the proposed land use changes do not result in any significant land use impacts. Further, as demonstrated throughout the Addendum, the increase in the amount of proposed development does not result in any new significant impacts or in a substantial worsening of a previously identified significant impact.

The Revised Project would result in the reduction of several FARs within the LASED area, while resulting in an increase in the FAR for the Olympic North Subarea and an overall increase in the FAR for the LASED Specific Plan area from 5.01 to 5.15. The Revised Project is consistent with the applicable density standards provided in the Central City Community Plan. Thus, as is the case with the Approved Project, the Revised Project would result in a less than significant impact with respect to density.

The proposed increase in permitted building heights within the Olympic North Subarea would require modifications to the LASED Specific Plan. By amending the LASED Specific Plan to permit a maximum tower height of 350 feet above grade, the Revised Project would be consistent with both the LAMC and Specific Plan. The height increase is also compatible with the maximum height allowed in other LASED subareas, including the Olympic East Subarea (660 feet), Figueroa Central Subarea (575 feet) and Figueroa South Subarea (400 feet). Potential environmental impacts related to aesthetics and shade/shadow are addressed in the Addendum and the conclusions of these analysis are that the implementation of the proposed height changes to the Olympic North Subarea would not result in any significant impacts or in a substantial worsening of a previously identified significant impact.

No further modifications would be made to the amount and type of development permitted on the remaining five subareas in the LASED Specific Plan area or the Figueroa North Subarea, other than reducing the maximum permitted development in portions of the Olympic West and Olympic East Subareas to accommodate the increased square footage permitted in the Olympic North Subarea.

Revised Project Impact Findings

Implementation of the Revised Project would not introduce new or substantially worsen the Approved Project's land use impacts. Thus, the land use impacts of the Revised Project would be consistent with those analyzed in the EIR and subsequent environmental analysis.

VI. Aesthetics – Visual Quality

Approved Project Impacts

During construction, the proposed temporary covered walkways along the public streets adjoining the LASED, along with other temporary construction barriers, could potentially serve as targets for graffiti and other unattractive visual features if not properly monitored. The EIR and subsequent Addendums concluded that the tower features of the Approved Project would have a beneficial impact on then viewshed by providing a visual link to the downtown high-rises to the north and east and would not have an impact on views to the south, as STAPLES Center and the Los Angeles Convention Center already obstructed these views. While the height and bulk of the Approved Project would differ from some of the existing commercial and residential buildings in the immediate vicinity, it would be compatible with the height and bulk of buildings that have been recently constructed or under construction in the South Park area.

The Approved Project would also contribute positively to the visual environment within the LASED and surrounding area by replacing existing surface parking lots and aging structures with new hotel, entertainment/retail/restaurant, office and residential uses. Planned LASED structures complement the existing Staples Center and Convention Center in architecture, lighting, landscaping and hardscape. Further, implementation of the Approved Project's streetscape design would also enhance the existing aesthetic quality of the area and establish a pedestrian friendly environment. The Approved Project's urban design would be consistent with the South Park Development Strategies and Design Guidelines and would serve to define the Approved Project as a distinctive entertainment district.

While the EIR and subsequent Addendums concluded that the Approved Project's signage would be consistent with applicable plans and regulations, visual quality impacts attributable to the Approved Project's proposed signage program were concluded to be significant due to the substantial signage that would be introduced to the area.

Revised Project Impacts

The visual quality impact during construction of the Approved Project results from the temporary creation of a construction site (i.e., the placement of graffiti on construction barriers). While the additional construction that would occur under the Revised Project might extend the duration of on-site construction, the implementation of the Approved Project's recommended mitigation measure would reduce the Revised Project's impacts to less than significant levels, regardless of the duration of the Revised Project construction.

The changes to the development on the Olympic North Subarea would increase the visibility of development through increased bulk and massing occurring at an increased height. These changes would reinforce the visual definition of the LASED area by creating buildings that are consistent with the physical form of LASED development located on the south side of Olympic Boulevard, opposite from the Olympic North Subarea. The additional height would conform to the massing and height of other parts of the LASED area, including the Olympic East Subarea (660 feet), Figueroa Central Subarea (575 feet) and Figueroa South Subarea (400 feet). Further, development of the Revised Project would not further restrict views from area viewsheds. Instead, the Revised Project would reinforce and extend the Approved Project's beneficial effect on the available viewsheds by adding additional tower features that provide a visual linkage to the downtown high-rises to the north and east and would increase the visibility of the LASED relative to the surrounding area. Therefore, the Revised Project would not increase the Approved Project's less than significant visual access impact.

Similar to the Approved Project, the Revised Project would alter the visual character of the Project Site and surrounding area by replacing existing surface parking lots and a single story office building on the Project Site with two towers on top of podium structures that would contain entertainment studio/production, office, hotel and residential uses. The change in proposed land uses on the Subarea would not result in additional visual quality impacts, as the change in bulk and massing would be incremental and minor, and the exterior of buildings would be

anticipated to be relatively similar in appearance and be consistent with the overall mixed-use theme of the LASED. Constructing taller and larger towers on the Olympic North Subarea would reinforce the development patterns in the LASED area and in doing so does not substantially alter the visual quality of the area, as high-rise structures are common to the LASED area and downtown Los Angeles area in general.

Similar to the Approved Project, the Revised Project would be contemporary in architectural style and character and would complement the existing LASED, Staples Center, and Convention Center in terms of architecture, lighting, landscape and hardscape and would be consistent with the Design Guidelines in the LASED Specific Plan. Expansion of the LASED Specific Plan area to include all of the Project Site will ensure consistent application of the LASED Specific Plan design guidelines and architectural standards. Thus, as with the Approved Project, impacts related to visual quality would be less than significant and the impacts of the Revised Project are similar to those of the Approved Project.

Regarding signage, the Revised Project would not expand any of the sign provisions currently provided in the Specific Plan to the four new parcels proposed to be included in the Olympic North subarea. These four parcels would remain subject to Los Angeles Municipal Code requirements. Therefore, there would be no increase the total amount, size, type, or placement of signage previously approved for the LASED Specific Plan. As with the Approved Project, signage would further enhance the sense of place and contribute to the area's identity as an entertainment district. Compliance with the LASED Specific Plan sign standards would ensure that the proposed signage would be consistent with the LASED Specific Plan signage. Additionally, the majority of proposed signage would face onto Olympic Boulevard, away from surrounding sensitive uses. Thus, the Revised Project would not increase the significant signage impact identified under the Approved Project.

Revised Project Findings

The Revised Project would not introduce new or substantially worse impacts regarding visual quality. Thus, the environmental implications of the Revised Project would be consistent with those analyzed in the EIR and subsequent environmental analysis.

VII. Aesthetics – Light and Glare

Approved Project Impacts

The Approved Project would increase the ambient light within the LASED area and surrounding area, as compared to existing conditions due to the introduction of multiple new buildings, including some high-rises, and signage. The EIR concluded that this would result in a less than significant impact during daytime conditions. With respect to nighttime illumination, the overall level of illumination would be increased under the Approved Project from building and parking lot lighting, as well as proposed signage. As the Approved Project would substantially increase nighttime illumination when compared to existing conditions, it was concluded that nighttime illumination impacts would be significant.

The Approved Project would be constructed of materials that produce minimal amounts of glare, resulting in a less than significant daytime and nighttime glare impact.

Revised Project Impacts

The Revised Project, similar to the Approved Project, would increase the amount of ambient lighting within the LASED and in the surrounding area as compared to existing conditions as it would replace the existing surface parking lot and single-story office building on the Olympic North Subarea with high-rise development. As with the Approved Project, the conversion of the

Subarea as a result of the increase in pedestrian-level lighting, signage, and interior lighting radiating through windows. However, all lighting would be implemented in conformance with the South Park Development Strategy and Design Guidelines, the LASED Specific Plan, the City's General Plan Framework Element, and other applicable policies.

With the exception of an increase in tower height and an incremental increase in the amount of signage, development on the Olympic North Subarea would not be substantially different from what was envisioned for this area under the Approved Project. The additional building height on the Olympic North Subarea under the Revised Project would not result in a substantial increase in lighting as existing area development already provides high amounts of ambient lighting. As a result, lighting impacts under the Revised Project would be less than significant and similar to the less than significant impacts of the Approved Project.

With respect to nighttime illumination, with the exception of the Olympic North Subarea, the Revised Project would not alter building designs in the remainder of the LASED in comparison to what was envisioned under the Approved Project. Concerning the Olympic North Subarea, the additional height, massing and size associated with the Revised Project is associated with office uses, which would largely not be in use at night and therefore would not result in lighting impacts beyond those generated by other nearby offices uses and other background lighting in the area. Further, as the Revised Project would decrease the square footage permitted for residential and hotel uses on the Olympic North Subarea, lighting associated with these uses would similarly be reduced as compared to the Approved Project. While the Revised Project would result in an incremental increase in the proposed signage within the Olympic North Subarea, it would not increase the overall type, placement, and amount of signage previously permitted within the LASED Specific Plan area. Therefore, the Revised Project's nighttime impacts would be similar to the Approved Project's nighttime illumination impacts.

The Revised Project, as is the case with the Approved Project, would be constructed of materials that produce minimal amounts of glare. Thus, as with the Approved Project, the Revised Project would result in a less than significant impact with regard to glare.

Revised Project Findings

The Revised Project would not introduce new or substantially worse impacts regarding light or glare. Thus, the environmental implications of the Revised Project would be consistent with those analyzed in the EIR and subsequent environmental analysis.

VIII. Aesthetics – Shade/Shadow

Approved Project Impacts

The EIR concluded that no off-site shadow sensitive uses would be significantly impacted by the Approved Project during the summer. Development to the maximum heights permitted under the Approved Project would result in significant shading impacts to five off-site shadow-sensitive uses during the winter, including two multi-family residential structures. These impacts would be reduced through implementation of the Project design guidelines and mitigation measures related to shade. However, while it was determined that adopted mitigation measures would reduce shade impacts, it would not be feasible to reduce all shading impacts to a less than significant level and still be consistent with the functions and uses anticipated to occur within the LASED. Thus, it was concluded that a significant shading impact would occur.

Revised Project Impacts

With the exception of the Olympic North Subarea, the Revised Project would not increase tower heights or building size in the LASED. The Revised Project would increase the maximum

building height occurring within the Olympic North Subarea from 200 feet above grade to 350 feet above grade and expand the footprint of the proposed towers beyond what was proposed under the Approved Project. The expanded footprint and increased height of the towers proposed on the Olympic North Subarea would incrementally increase the shadow lengths from the Subarea when compared to the Approved Project. Under the Revised Project, two multi-family buildings north of the Subarea would be shaded for more than four hours from approximately 12:00 PM to 5:00 PM during the summer. While these residential buildings would be shaded for more than four hours during the summer months, the owner of these two residential buildings has been issued a court order to vacate the buildings due to sub-standard living conditions and the structures are nearly vacant and considered uninhabitable. As such, the buildings would not be occupied at the time of the completion of construction of the Olympic North Subarea and thus is not considered a shade shadow sensitive land use. As such, shading impacts during the summer would be less than significant, as is the case with the Approved Project.

Shadow lengths also would be incrementally increased during the winter. Winter shadows would shade the commercial uses northeast of the Olympic North Subarea in the morning and the two multi-family residential buildings and surface parking lots north of the Subarea though the late afternoon period. The Revised Project would therefore result in an incremental increase in shading as compared to the Approved Project. Moreover, as with the Approved Project, the Revised Project would primarily result in shade impacts to the two multi-family residential structures north of the Subarea; however, as mentioned above, these buildings are not considered a shade shadow sensitive land use. As such, Revised Project shading impacts during the winter would not substantially worsen a previously identified significant impact.

Revised Project Findings

The Revised Project would not introduce new or substantially worsen impacts regarding shade/shadow. Thus, the environmental implications of the Revised Project would be consistent with those analyzed in the EIR and subsequent environmental analysis.

IX. Population, Housing and Employment

Approved Project Impacts

The Approved Project's 2,101 residential units would generate approximately 5,966 residents, within the growth projected for the Central City Community Plan area and the City of Los Angeles subregion. The downtown area is currently a jobs rich area, in which housing is not sufficient to support the employee base. The Approved Project's addition of residential units in the downtown area would further the policies of the City and SCAG and establish a better balance between the distribution of housing and employment. With regard to employment, the EIR determined that the Approved Project would generate approximately 5,343 jobs in the LASED area, resulting in a favorable impact on employment in the area. In addition, it was found that the Approved Project would contribute to improving the jobs-to-housing ratio within the Central City Community area. Thus, the population, housing and employment impacts were determined to be less than significant with the Approved Project.

Revised Project Impacts

The Revised Project would develop a total of 2,065 residential units in the LASED area, which is a decrease of 36 units as compared to the Approved Project. The Revised Project's residential units are forecasted to generate 5,864 residents, which is a decrease of 102 residents when compared to the Approved Project. The Revised Project's residential population would not exceed the forecasted population and housing growth for the Community Plan Area or the City of Los Angeles subregion, and would represent a reduction when compared to the Approved

Project. Similar to the Approved Project, the Revised Project would facilitate the achievement of local and regional policies to provide housing in the downtown Los Angeles area and improve the jobs/housing balance. Further, the Revised Project would not cause a substantial change in the location, distribution, density, or growth rate of population and housing anticipated for the area and would not conflict with the goals and policies set forth in City and SCAG plans. Thus, the population/housing impacts would be less than significant and less than those associated with the Approved Project due to the relative reduction in housing under the Revised Project.

The Revised Project is estimated to generate approximately 7,071 jobs, which is an increase of 1,715 jobs as compared to the Approved Project, exceeding the employment projections for the Central City area. Increased employment opportunities are seen as a benefit to the community and the Revised Project's increase in employment would provide residents living in the LASED area with greater opportunities to live and work in the same place, resulting in a corresponding economic benefit to the community and supporting a 24-hour-a-day environment. Additionally, the Revised Project's increase in employment along with the increase in housing would further the downtown's current transition towards a mixed-use area and support City and SCAG policies with regard to improving the jobs-housing ratio in the downtown area. As such, the Revised Project would not create any new impacts with respect to population, housing, and employment nor would the Revised Project increase the severity of any previously identified impacts.

Revised Project Findings

The Revised Project would not introduce new or substantially worsen impacts regarding population, housing and employment. Thus, the environmental implications of the Revised Project would be consistent with those analyzed in the EIR and subsequent environmental analysis.

X. Hydrology

Approved Project Impacts

The EIR determined that the construction and operation of the Approved Project would not result in a significant change to existing hydrologic conditions. Further, as the LASED site is fully paved, the Approved Project would have a beneficial impact on runoff by increasing the amount of pervious areas through landscaping. Thus, the Approved Project would result in a less than significant drainage impact.

With implementation of Best Management Practices ("BMPs") and compliance with all relevant storm water quality management programs, the Approved Project would result in a less than significant impact during construction. While the Approved Project would also increase the amount of contaminants in storm water runoff resulting from an increase in automobile traffic, the Approved Project would implement source control and treatment BMPs approved by the Regional Water Quality Control Board. With implementation of these BMPs, the Approved Project would result in a less than significant impact to surface water quality.

Revised Project Impacts

The Revised Project would increase the size of the Olympic North Subarea and the amount of development that would occur within the Subarea. However, both the existing Subarea and the proposed expanded Subarea are comprised almost entirely of impervious surfaces (e.g., buildings and surface parking lots). Similar to the Approved Project, the Revised Project would have a beneficial impact on the expanded Olympic North Subarea, as it would increase the amount of pervious areas on the site through increased landscaping. Therefore, the rate and amount of storm water runoff would be similar and thus drainage impacts for the Revised

Project would be the same as those under the Approved Project. The local storm drain infrastructure would be adequate to accommodate the increased residential and commercial uses. Thus, as is the case with the Approved Project, the Revised Project would result in less than significant impacts to drainage.

With regard to surface water quality, similar to the Approved Project, the Revised Project would implement BMPs and would comply with relevant storm water quality management programs. Therefore, surface water quality impacts during construction would be less than significant. Under the Revised Project, the amount of impervious and pervious areas throughout the LASED area would remain the same as the Approved Project. Further, development of the expanded Olympic North Subarea would comply with current SUSMP requirements which would require the incorporation of measures which would improve surface water quality within this area of the Revised Project when compared to existing conditions. Therefore, as is the case with the Approved Project, the Revised Project would result in less than significant impacts to surface water quality.

Revised Project Findings

The Revised Project would not introduce new or substantially worsen impacts with regard to drainage and surface water quality. Thus, the environmental implications of the Revised Project would be consistent with those analyzed in the EIR and subsequent environmental analysis.

XI. Air Quality

Approved Project Impacts

The EIR concluded that Approved Project would result in construction emissions of CO, ROC, NOx and PM10 that exceed South Coast Air Quality Management District ("SCAQMD") regional significance thresholds for construction activities, thereby resulting in a significant and unavoidable impact. Localized construction PM10 impacts on sensitive receptors would be less than significant. During operation of the Approved Project, traffic and other pollutant sources, such as consumption of energy, would result in regional emissions of CO, ROC, NOx and PM10 that exceed SCAQMD regional significance thresholds. Therefore, operation of the Approved Project would result in a significant and unavoidable impact on air quality. Sensitive receptors in the area would not be significantly affected by localized CO emissions generated by traffic attributable to the Approved Project. In addition, the EIR found that the Approved Project would be consistent with applicable SCAQMD and SCAG air quality policies.

When the EIR was prepared, there were no regulatory requirements to analyze impacts related to global climate. To provide a comparison to the Revised Project, the Addendum analyzed greenhouse gas impacts associated with the Approved Project. In the absence of specific regulatory guidance, if a project implements strategies consistent with the goals of Assembly Bill 32 and the LA Green Plan, the project will not be considered to have a significant impact with respect to global climate change, either on a project-specific basis or with respect to its contribution to a cumulative impact on global climate change. The Approved Project is designed with a number of features and mitigation measures that are consistent with the City's LA Green Plan, the goals of AB 32, and the recommendations and strategies of the California Climate Action Team. The Approved Project promotes reductions in vehicle trips and consequent generation of greenhouse gas emissions by (1) providing a mix of uses including commercial office, retail, restaurant, hotel and residential uses; (2) providing improved opportunities for the use of public transit, including bus and rail; (3) encouraging pedestrian and bicycle circulation through a well established sidewalk system in the project vicinity; and (4) by providing on-site recreation and open space amenities. These benefits, combined with other adopted project design features and mitigation measures, establish compliance with the goals of California's AB 32, LA Green Plan, and the CAT recommendations and strategies. Therefore,

the Approved Project is not considered to have a significant impact with respect to global climate change, either on a project-specific basis or with respect to its contribution to a cumulative impact.

Revised Project Impacts

The change in residential, hotel and office land use mix under the Revised Project would not change the types of construction activities within the Olympic North Subarea as compared to the Approved Project. While the Revised Project would result in an incremental increase in the overall amount of building construction as compared to the Approved Project, pollutant emissions and fugitive dust from site preparation and construction activities would be similar on a daily basis, as only the duration and not intensity of these activities would increase compared to the Approved Project. The Revised Project would implement the same mitigation measures, as applicable, that were identified for the Approved Project. Therefore, the Revised Project would not involve any new significant impacts related to construction air quality and any incremental new impacts would be expected to be less than significant. Although the Revised Project would expand construction to parcels immediately north of the existing Olympic North Subarea, this change would not result in construction near any additional sensitive receptors. As with the Approved Project, the Revised Project would result in a less than significant impact for localized emissions.

Like the Approved Project, the Revised Project would implement key air quality policies set forth by the City, SCAG, and the SCAQMD and would be consistent with those policies. In comparison to the original LASED project analyzed in the EIR, the Revised Project would decrease weekday daily vehicular trips by 2 percent and increase weekend vehicular trips by 0.6 percent. The increase in daily weekend trips would not substantially change projected emissions for the Olympic North Subarea and would not create a significant impact related to CO hotspots. Additionally, the additional commercial uses included in the Revised Project would result in slightly higher stationary operational emissions than under the Approved Project; however, this increase would only be incremental and minor as compared to the Approved Project's emissions. The Revised Project would implement the same mitigation measures as the Approved Project. Therefore, the Revised Project would not involve any new significant impacts related to operational air quality and any incremental increase in emissions would be less than significant.

Similar to the Approved Project, the Revised Project is designed with a number of features and mitigation measures that comply with the goals of California's AB 32, LA Green Plan, and the CAT recommendations and strategies. The Revised Project promotes reductions in greenhouse gas emissions in the same ways as the Approved Project, described above. Although the Revised Project would result in an incremental increase in vehicular trips on weekends, the increase would not be of a sufficient magnitude to result in a significant increase in greenhouse gas emissions. Therefore, the Revised Project would not involve any new significant impacts related to greenhouse gases and any incremental increase in emissions would be less than significant.

Revised Project Findings

The Revised Project would not introduce new or substantially worsen the previously identified significant impacts with regard to air quality. Thus, the environmental implications of the Revised Project would be consistent with those analyzed in the EIR and subsequent environmental analysis.

XII. Transportation/Circulation - Traffic

Approved Project Impacts

The EIR concluded that, as most construction traffic would arrive and depart during off-peak hours, the impact on peak-hour traffic would be negligible. Although certain streets may be closed to complete certain utility relocations, the EIR concluded that no street closures other than the realignment of 12th Street between Figueroa and Flower Streets would result in a significant impact. As this realignment has been completed, the temporary significant impact during construction that was identified in the EIR is no longer relevant.

The EIR concluded that 17 intersections would be significantly impacted during the weekday PM peak hour and 10 intersections would be significantly impacted during the Saturday evening peak hour. However, with implementation of the required mitigation measures, significant impacts would be reduced to 15 intersections during the PM peak hour and 8 intersections during the Saturday evening peak hour. The EIR also concluded that a significant impact would occur at the 9th Street northbound off-ramp from the SR-110 Harbor Freeway. In addition, residential street impacts could also potentially occur on 11th Street east of Burlington Avenue and on 12th Street east of Burlington Avenue and between Valencia and Albany Streets; however, such impacts are considered unlikely due to the fact that the arterial streets provide the most direct and convenient access to the Project site.

Revised Project Impacts

While the types of uses planned for the Olympic North Subarea would differ from that approved for the Approved Project, the changes in the maximum amount of construction daily activity would not be sufficiently different to result in a substantial increase in construction traffic impacts as compared to the Approved Project.

The Revised Project would generate a total of 3,541 PM peak hour trips, which would be about 16 percent more than the total of 3,058 trips generated by the Approved Project; however, this total would be 2 percent less than the 3,612 trips analyzed in the EIR. There would be an approximately 14 percent decrease in the number of PM peak hour inbound trips and approximately 11 increase in PM peak hour outbound trips as compared to the project analyzed in the EIR. As the overall total trips for the Revised Project would be less than the number of trips analyzed in the EIR, and as the overall inbound/outbound totals are very similar, the Revised Project would not create any new significant impacts, or substantially worsen the previously identified impacts in the PM peak hour.

The Revised Project would generate a total of 5,214 trips in the Saturday evening peak hour, which would be about 0.2 percent less than the total of 5,227 trips identified for the Approved Project. While the Revised Project would generate a trip total approximately 0.6 percent greater than the 5,181 trips analyzed in the EIR, it was previously determined for the Approved Project that 5,227 trips would not constitute a significant increase in trips over the EIR nor cause additional significant impacts. There would be an approximately 0.3 percent decrease in the number of Saturday Evening peak hour inbound trips and an approximately 3 percent increase in Saturday Evening peak hour outbound trips for the Revised Project compared to the trips in the Final EIR. As the overall trip total for the Revised Project would be less than that analyzed for the Approved Project, and because the inbound and outbound trip totals would be very similar, the Revised Project would not create any new significant traffic impacts, or substantially worsen the previously identified significant impacts in the Saturday Evening peak hour. The distribution of parking for the Revised Project would be similar to the distribution planned for the Approved Project, resulting in a similar trip distribution pattern. In summary, the Revised Project would not create any new significant impacts or substantially worsen the significant traffic impacts identified in the EIR with regard to intersections, freeway ramps, CMP monitoring locations, transit systems and residential streets.

Revised Project Findings

The Revised Project would not introduce new or substantially worsen the previously identified significant impacts with regard to traffic. Thus, the environmental implications of the Revised Project would be consistent with those analyzed in the EIR and subsequent environmental analysis.

XIII. Transportation/Circulation – Parking

Approved Project Impacts

During construction of the Approved Project, nearby lots for STAPLES Center parking would be utilized for construction parking since these lots are typically not used during the daytime when construction activity would occur. Adequate replacement parking for STAPLES Center would be maintained. Thus, no significant parking impacts would occur during construction of the

Approved Project.

The Approved Project would provide 7,068 on-site parking spaces in parking garages at various locations on the Project site. This would meet the projected Code required parking of 6,887 parking spaces required for the Approved Project. During peak hours on Saturdays, any excess need for parking would be met by nearby off-site parking and private lots. Parking impacts associated with the Approved Project would therefore be less than significant.

Revised Project Impacts

The Revised Project, as with the Approved Project, would utilize nearby STAPLES Center and Nokia Theater parking lots for construction parking. Therefore, construction parking impacts of the Revised Project would be comparable to those of the Approved Project, and construction parking impacts would be less than significant.

The Revised Project proposes to provide a total of 7,083 spaces in parking garages at various locations on the Project site, with a slightly reduced number of parking spaces proposed for the Olympic North Subarea, and 1,030 off-site parking spaces, for a total of 8,113 spaces. As compared to the Approved Project, the Revised Project would provide an additional 15 on-site parking spaces, with a slightly greater number of parking spaces dedicated to commercial uses. Off-site spaces would be located within 1,500 feet of the Project site as required by the LASED Specific Plan, anticipated to be located to the north and east of the Project site. Parking for the Revised Project would meet the Code-required parking requirement of 8,109 parking spaces. On a typical day, the total peak parking demand for the Revised Project would be approximately 7,907 parking spaces, or 206 parking spaces less than the total available parking supply. Thus, the Revised Project would not create a significant parking impact on a typical day.

During peak weekend demand, the total parking demand would be 10,592 parking spaces, or 2,479 parking spaces more than that provided by the Revised Project. However, as previously identified in the EIR, this excess of parking demand for a peak day would park off-site in the adjacent areas to the north and east, and utilize the existing abundance of off-site parking supply in both public and private lots. Since the peak parking demand for the Revised Project occurs at evening, the office parking spaces to the north and east of the Project site, as well as the parking proposed for the Olympic North Subarea, are prime candidates for shared parking opportunities. Therefore, similar to the Approved Project, the Revised Project would not introduce or substantially worsen parking demand impacts.

Revised Project Findings

The Revised Project would not introduce new or substantially worsen impacts with regard to parking. Thus, the environmental implications of the Revised Project would be consistent with those analyzed in the EIR.

XIV. Hazardous Materials

Approved Project Impacts

During construction of the Approved Project, excavation and earthwork activities would have the potential to release contaminants into the air. Additionally, demolition of asbestos/lead-containing structures within the LASED area would have the potential to release these substances into the atmosphere. Further, the Approved Project would result in an increase in the handling and storage of hazardous materials during construction. However, compliance with existing regulations and with implementation of the established mitigation measures, construction-related impacts regarding hazardous materials would be reduced to less than significant levels. Operational impacts regarding hazardous materials would also be less than significant as all hazardous materials would be stored, handled, and disposed of in accordance with all applicable federal, state, and local regulations. Therefore, the impacts from the Approved Project regarding hazardous materials would be less than significant.

Revised Project Impacts

The Revised Project would require additional construction activities due to the overall increase in the amount of development and, as such, would result in an increase in the handling and storage of hazardous materials during construction. Additionally, as the size of the Olympic North Subarea would be increased to accommodate the proposed development, the Revised Project would demolish one additional structure (a single-story office building). Given the age of this structure, there is the potential for asbestos-containing materials and/or lead-based paints to be released into the atmosphere during its demolition; however, compliance with existing regulations and mitigation measures included for the Approved Project would result in a less than significant impact. Excavation and earthwork activities under the Revised Project would be greater than those of the Approved Project, resulting in an incremental increase in the potential to release contaminants during construction. However, compliance with mitigation measures adopted for the Approved Project and existing regulations would result in less than significant impacts related to the release of contaminants during construction. Further, the Revised Project would develop the same types of land uses as the Approved Project within the LASED, and thus would involve the same types of hazardous materials. As with the Approved Project, all potentially hazardous materials would be stored, handled, and disposed of properly in compliance with existing regulations. Thus, as with the Approved Project, the Revised Project would result in less than significant impacts concerning hazardous materials.

Revised Project Findings

The Revised Project would not introduce new or substantially worsen previously identified significant impacts with regard to hazardous materials. Thus, the environmental implications of the Revised Project would be consistent with those analyzed in the EIR and subsequent environmental analysis.

XV. Noise

Approved Project Impacts

Construction on portions of the Olympic and Figueroa Properties would have the potential to exceed 75 dBA within 500 feet of existing residential areas. Even with the incorporation of all feasible mitigation measures, construction noise would still significantly impact nearby sensitive

receptors. The Approved Project would also result in a significant impact regarding traffic noise along portions of Francisco Street. Outdoor noise associated with the Approved Project, such as tennis courts and pools, would result in a less than significant impact.

Revised Project Impacts

The Revised Project would result in an incremental increase in overall construction on the Project Site as compared to the Approved Project; however, daily construction activities and the resulting noise levels would be similar, as the Revised Project would impact only the duration of construction activities, not the intensity. While the Revised Project would result in construction on four additional parcels north of the existing Olympic North Subarea, this change would not result in additional construction noise near sensitive receptors. The Revised Project would implement the same construction mitigation measures, as applicable, identified for the Approved Project. Therefore, the Revised Project would not involve any new significant impacts related to construction noise or result in a substantial increase in a previously identified significant impact. While the Revised Project would change the mix of land uses for the Olympic North Subarea, the proposed uses would not be anticipated to generate significant noise levels at sensitive receptors and would be considered less than significant. The Revised Project would not substantially increase traffic noise because traffic volumes and distribution are comparable to those of the Approved Project. Further, the Revised Project would implement the same operational mitigation measures, as applicable, that were identified for the Approved Project. Therefore, the Revised Project would not involve any new significant impacts related to operational noise or result in a substantial increase in a previously identified significant impact.

Revised Project Findings

The Revised Project would not introduce new or substantially worsen impacts with regard to noise. Thus, the environmental implications of the Revised Project would be consistent with those analyzed in the EIR and subsequent environment analysis.

XVI. Public Services – Fire Protection

Approved Project Impacts

Traffic disruptions during construction of the Approved Project would be temporary and would not significantly affect emergency access or response times. Therefore, no significant impact to fire protection services would occur during construction. During operation, the Approved Project's land uses would increase the need for LAFD services. Further, during post-event periods at the STAPLES Center and Convention Center, traffic congestion could potentially cause significant delays in LAFD emergency response times into the LASERD. However, with implementation of the adopted mitigation measures, these impacts would be reduced to a less than significant level. As the Approved Project would implement mitigation measures to ensure fire flows are adequate, it was concluded that impacts to fire flow service would be less than significant.

Revised Project Impacts

The Revised Project would increase the total amount of development within the LASERD; however, impacts with regard to emergency access are not anticipated since Revised Project construction traffic would typically occur during off-peak hours and be predominately freeway oriented. The Revised Project impacts with regard to emergency access would therefore be similar to those resulting from construction activities associated with the Approved Project.

During operation, the Revised Project's increased development levels would potentially result in a higher demand for fire protection services as compared to the Approved Project. As three fire

stations are located within 1.1 miles of the LASED, sufficient fire fighting and paramedic resources are available to meet the increased demand attributable to the Revised Project. Furthermore, activity levels under the Revised Project, as compared to the Approved Project, would represent a minor increase in the overall population served by the fire stations in proximity of the Project Site. The limited changes in daily trips under the Revised Project are not sufficient to cause an increase in impacts with regard to emergency vehicle access. Furthermore, the Revised Project would implement the same mitigation measures identified for the Approved Project. Therefore, impacts on fire protection services would be less than significant, as is the case with the Approved Project.

Revised Project Findings

The Revised Project would not introduce new or substantially worsen impacts with regard to fire protection services. Thus, the environmental implications of the Revised Project would be consistent with those analyzed in the EIR and subsequent environment analysis.

XVII. Public Safety – Police

Approved Project Impacts

With implementation of the adopted mitigation measures, construction impacts with regard to police services would be reduced to less than significant levels. The Approved Project would generate an increased need for police protection services on-site and off-site during events within the LASED or at STAPLES Center. The Approved Project would include security features and mitigation measures, including but not limited to private on-site security, adequate parking lot lighting, and development of an Emergency Procedures Plan, that would minimize the potential for on-site crime and reduce the demand for additional police services. Therefore, the Approved Project's impact on police service would be less than significant. Further, the Approved Project would implement mitigation measures to reduce emergency access delay impacts to a less than significant level.

Revised Project Impacts

The Revised Project would increase the total amount of development within the LASED. Revised Project impacts with regard to emergency access would not be substantially greater than those resulting from construction activities associated with the Approved Project because any increases in construction traffic would typically occur during off-peak hours and be predominantly freeway oriented. Thus, as is the case with the Approved Project, implementation of mitigation measures would reduce the Revised Project's construction impacts on police protection services to less than significant levels.

The Revised Project would involve a change in the land use mix for the Olympic North Subarea, resulting in a decrease in the previously approved residential units. As such, the Revised Project would decrease the residential population, and therefore would not negatively impact the officer-to-resident ratio when compared to the Approved Project. As the Revised Project would increase the commercial and overall uses within the LASED area, the Revised Project would create a slight increase in demand on police protection services as compared to the Approved Project. However, as the increase in commercial floor area would be relatively minor in comparison to the floor area envisioned to be developed within the LASED area, it is reasonable to assume that any increased demands upon police services would be nominal. Furthermore, the Revised Project would implement the same mitigation measures identified for the Approved Project. Additionally, the Revised Project would result in a less than significant impact on emergency response times with the implementation of the adopted mitigation measures. Therefore, the Revised Project would not create any new impacts with respect to police protection services or increase the severity of any previously identified impacts.

Revised Project Findings

The Revised Project would not introduce new or substantially worsen impacts with regard to police services. Thus, the environmental implications of the Revised Project would be consistent with those analyzed in the EIR and subsequent environment analysis.

XVIII. Public Facilities - Schools

Approved Project Impacts

The Approved Project would generate a total of 2,352 new students, which would exceed the capacity of the applicable elementary school, middle school, and high school. However, the Approved Project would pay development fees pursuant to Government Code Section 65995, the payment of which constitutes full mitigation of school impacts and results in a less than significant impact for the Approved Project.

Revised Project Impacts

The Revised Project would result in 2,729 students, which is an increase of 308 students over the Approved Project, primarily due to the increase in employment-related students. The specific schools that would receive these students cannot be determined, because they depend on the household location and school enrollment decision of each employee household. Therefore, as these students would be distributed across the LAUSD, the school facility impacts from non-residential development would not significantly impact the schools currently servicing the Project Site. Additionally, as is the case with the Approved Project, the Revised Project would pay development fees to the LAUSD. Per the provisions of Government Code Section 65995, the payment of these fees would fully mitigate the school impacts attributable to the Revised Project. Thus, as with the Approved Project, the impacts of the Revised Project would be less than significant.

Revised Project Findings

The Revised Project would not introduce new or substantially worsen impacts with regard to schools. Thus, the environmental implications of the Revised Project would be consistent with those analyzed in the EIR and subsequent environment analysis.

XIX. Public Facilities -Parks and Recreation

Approved Project Impacts

The Approved Project's new residential population of 5,966 persons would result in an increased use of existing neighborhood, community and regional parks. While the Approved Project would satisfy the City's open space requirements as set forth in the LAMC and would pay in-lieu fees under the Quimby Act to offset the demand for park facilities, the Approved Project would not meet the Department of Recreation and Parks standard of four acres per 1,000 residents. Therefore, the EIR concluded that a significant impact on parks and recreational facilities would occur.

Revised Project Impacts

The Revised Project's residential units would result in a residential population of approximately 5,864 persons, which is a decrease of 102 persons when compared to the Approved Project. As the Revised Project represents a reduction in the LASED's resident population, the Revised Project would similarly lessen the park deficiency identified under the Approved Project.

Development of the Revised Project would comply with all LASED Specific Plan open space provisions, and therefore, the parks and recreational demands attributable to the residential population under the Revised Project would be generally satisfied to the same degree as the Approved Project. Additionally, similar to the Approved Project, the Applicant would be required to pay in-lieu park fees under the Quimby Act to offset the demand for park facilities by future Revised Project residents. As the Revised Project would reduce the overall LASED residential population, it would result in a slight reduction in the severity of a previously identified significant impact. However, the reduction in impact is not of a significant magnitude to reduce the Approved Project's significant impact to a less than significant level. Therefore, as with the Approved Project, impacts on parks and recreational facilities under the Revised Project would be significant.

Revised Project Findings

The Revised Project would not substantially worsen the previously identified significant impacts with regard to parks and recreation services. Thus, the environmental implications of the Revised Project would be consistent with those analyzed in the EIR and subsequent environment analysis.

XX. Utilities - Water

Approved Project Impacts

The Approved Project's water demand during construction would result in less than significant impacts with regard to existing water service, water lines, and facilities. During operation, the Approved Project would consume approximately 2,106,949 gallons per day (gpd) of water. Although the Approved Project's water demand would constitute a small portion of the regional water demand, impacts regarding water supply would be significant. Impacts regarding water infrastructure would be less than significant as LADWP has indicated that the existing water distribution and treatment facilities would be adequate to provide for the Approved Project's water demand.

Revised Project Impacts

With regard to construction, the amount of excavation and earth moving would be greater under the Revised Project than under the Approved Project, as the incremental increase in development under the Revised Project would result in increased site preparation activities. However, this increase would be incremental and would not result in a substantial increase in demand such that impacts would occur to existing water service, water lines, and facilities. Therefore, water demand during construction would also be the same as the Approved Project.

With regard to water demand during operation, the Revised Project would consume approximately 2,122,432 gpd, which is approximately 15,483 gpd (or 0.7 percent) more than the Approved Project. The Revised Project would implement the same mitigation measures, as applicable, as the Approved Project, which would reduce any potential incremental impacts. Since the Approved Project's water demand would constitute a small portion of the regional water demand, the Revised Project's incremental increase in water consumption would not substantially worsen a previously identified significant impact.

Due to the limited increase in overall water demand under the Revised Project, it is anticipated that the existing water infrastructure would be sufficient to serve the water demand of the Revised Project. In the event that insufficient capacity is available, improvements to the infrastructure system would be made in accordance with standard City practices and procedures to address any and all system deficiencies. As such, environmental impacts associated with potential system expansion would be reduced to less than significant levels and

the Revised Project would have a less than significant impact with regard to infrastructure within which water would be conveyed.

Revised Project Findings

The Revised Project would not introduce new or substantially worsen the previously identified significant impacts with regard to water supply and water infrastructure. Thus, the environmental implications of the Revised Project would be consistent with those analyzed in the EIR and subsequent environment analysis.

XXI. Utilities – Sewer

Approved Project Impacts

Operation of the Approved Project would generate approximately 1,756,236 gallons per day (gpd) of wastewater. The existing sewer lines and trunk sewer surrounding the LASED, as well as the Hyperion Wastewater Treatment Plant, have available capacity to accommodate sewage generated by the Approved Project. No significant impacts regarding sewage would occur with the Approved Project. Nonetheless, the Approved Project would implement mitigation measures to ensure that wastewater generation would be reduced to the maximum extent feasible.

Revised Project Impacts

The Revised Project would generate approximately 1,769,138 gpd of sewage, which is approximately 12,902 gpd (or 0.7 percent) more than the Approved Project. As with the Approved Project, it is anticipated that the existing sewage infrastructure would be sufficient to serve the Revised Project because sufficient capacity would exist for the incremental increase. In the event that insufficient capacity is available, improvements to the infrastructure system would be made in accordance with standard City practices and procedures to address any and all system deficiencies. Additionally, the Revised Project would implement the same mitigation measures, as applicable, as the Approved Project. As such, environmental impacts associated with potential system expansion would be reduced to less than significant levels and less than significant impacts regarding sewage would occur with the Revised Project.

Revised Project Findings

The Revised Project would not introduce new or substantially worsen impacts with regard to sewage. Thus, the environmental implications of the Revised Project would be consistent with those analyzed in the EIR and subsequent environment analysis.

XXII. Utilities - Solid Waste

Approved Project Impacts

Less than significant impacts with regard to solid waste (e.g. rock, concrete, brick, sand, soil, asphalt, sheetrock, wood, metal, drywall, and cardboard) disposal capacity are anticipated during construction of the Approved Project because on-site source separation of waste materials for recycling would be implemented. The Approved Project would result in approximately 22,025 pounds of solid waste per day during operation, or 4,020 tons per year. The Approved Project would implement source reduction, recycling, and diversion measures, which would serve to reduce the amount of waste disposed at area landfills. The EIR concluded that the Approved Project would have a less than significant impact to the remaining disposal capacity of available landfill facilities. As a result, the development of the Approved Project would result in a less than significant impact regarding solid waste.

Revised Project Impacts

The Revised Project would result in an increase in the amount of solid waste generated during construction. However, as with the Approved Project, because construction and demolition waste would be minimized and recycled to the extent practicable, the Revised Project would not substantially worsen construction-related solid waste impacts. The Revised Project would consume approximately 24,827 pounds per day, or 4,531 tons per year, which is approximately 511 tons per year more than the Approved Project. As such, the Revised Project would increase the demand for disposal capacity at landfills. The Revised Project's annual solid waste generation would represent approximately 0.3 percent of the combined remaining daily permitted intake of the Sunshine Canyon and Chiquita Canyon Landfills. Additionally, the Revised Project would implement the same mitigation measures, as applicable, recommended for the Approved Project, which would further reduce any potential incremental impacts related to solid waste. Therefore, the Revised Project's impacts to landfill disposal capacity would remain less than significant and development under the Revised Project would not substantially worsen impacts regarding solid waste.

Revised Project Findings

The Revised Project would not introduce new or substantially worsen impacts with regard to solid waste. Thus, the environmental implications of the Revised Project would be consistent with those analyzed in the EIR and subsequent environment analysis.

XXIII. Geology/Seismic Hazards

Approved Project Impacts

With implementation of identified mitigation measures, the Approved Project would be designed so that there would be no increased threat of exposing people, property, or infrastructure to geotechnical or seismic hazards. Therefore, with implementation of the adopted mitigation measures, any potential geologic or seismic impacts would be reduced to less than significant levels. Further, with implementation of the adopted mitigation measures, potential impacts related to subsidence with the Approved Project would be reduced to a less than significant level.

Revised Project Impacts

The Revised Project would result in an increase in the amount of development and would increase the total land area on which development would occur, thereby requiring additional construction activities and a greater amount of excavation when compared to the Approved Project. However, this increase would be incremental and, via compliance with the same adopted mitigation measures as the Approved Project, the Revised Project's geologic and seismic hazards would remain less than significant.

Portions of the LASED are located within the State- and City-designated former Downtown Los Angeles Oil Field. However, the Olympic North Subarea is not located within this former oil field and increasing both the amount of development, as well as the physical size of the Subarea would not increase the potential for methane release during construction. The Revised Project would not increase development on any other subareas. Therefore, construction impacts on geology and seismic hazards would be similar to those of the Approved Project, and less than significant.

Due to the increase in office and studio/production development, the Revised Project would result in an incremental, but not substantial, increase in the exposure of employees and visitors

to geologic and seismic hazards. However, the Revised Project would implement mitigation measures to reduce geologic and seismic impacts to less than significant levels. Thus, the Revised Project, as is the case with the Approved Project, would result in a less than significant impact with regard to potential geologic and seismic hazards.

Revised Project Findings

The Revised Project would not introduce new or substantially worsen impacts with regard to geology and seismic hazards. Thus, the environmental implications of the Revised Project would be consistent with those analyzed in the EIR and subsequent environmental analysis.

XXIV. Architectural/Historic Resources

Approved Project Impacts

The Approved Project would not result in any adverse effects to historic resources. There are no historic resources located within the LASED. Construction activities associated with the Approved Project do not result in any significant impacts to historic resources in the vicinity of the Project Site. With regard to operation, the Approved Project would result in less than significant impacts with regard to the Valley Arts Center and would have no physical or indirect impacts on the Petroleum Building and Hotel Figueroa. As such, the Approved Project would have less than significant impacts on these buildings, and the potential impacts of the Approved Project with regard to the architectural/historic resources are concluded to be less than significant.

Revised Project Impacts

The Revised Project would not result in impacts to any identified historic resources, including the Valley Arts Center, Petroleum Building and Hotel Figueroa. To accommodate the proposed development, the Revised Project would require demolition of one single-story office building north of the existing Olympic North Subarea. However, this structure was not identified as being eligible as a historic resource in the EIR or subsequent Addendums. As such, the Revised Project would not create any new impacts to the identified historic resources or increase the severity of previously identified impacts. Additionally, with implementation of the mitigation measures approved for the Approved Project, the Revised Project would result in a less than significant impact to identified paleontological, archaeological and/or cultural resources, similar to the Approved Project.

Revised Project Findings

The Revised Project would not introduce new or substantially worsen impacts with regard to architectural/historic resources. Thus, the environmental implications of the Revised Project would be consistent with those analyzed in the EIR and subsequent environmental analysis.

XXV. Other CEQA Considerations

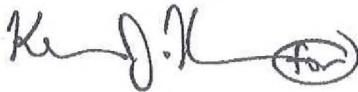
- A. The City of Los Angeles, acting through the Planning Department, is the "Lead Agency" for the Revised Project evaluated in the Addendum. The City finds that the Addendum was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the Addendum for the Revised Project and that the Addendum reflects its independent judgment.
- B. The City finds and determines that the information contained in the Addendum and staff errata for the Revised Project is adequate for matters related to the Revised Project, which is before the City, and that the City has reviewed and considered the information contained

therein pursuant to the State CEQA Guidelines, and the City CEQA Guidelines along with other factors related to this matter.

- C. The City finds and determines that, based on the information set forth in the Addendum and in the Statement of Environmental Effects and Findings and other staff errata, with respect to the potentially significant impacts analyzed in the EIR, the Revised Project will not create any new or result in any substantial increase in the severity of previously identified potentially significant impacts in any of the analyzed environmental impact categories and that no new mitigation measures are identified in the Addendum that would modify the Mitigation Monitoring and Reporting Program adopted in connection with certification of the EIR and which are incorporated into the Addendum by reference.
- D. The City finds and determines that, pursuant to Section 15162(a)(3) of the State CEQA Guidelines, the Revised Project, as compared to the Approved Project, neither constitutes nor contains new information of substantial importance that was not known or could not have been known with the exercise of reasonable diligence at the time the EIR was certified as complete.

The City finds and determines that no additional environmental impacts other than those identified in the EIR will have a significant effect or result in a substantial or potentially substantial adverse effect on the environment as a result of the Revised Project.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael LoGrande", followed by a circular stamp containing the word "for".

Michael LoGrande
Director of Planning

RHS:KK/CW
Transmittal