

## TRANSMITTAL TO CITY COUNCIL

<b>Case No.(s)</b>	<b>Planning Staff Name(s) and Contact No.</b>	<b>C.D. No.</b>
CPC-2009-2677-SPA-ZC-DA	CRAIG WEBER 213-978-1213	9
<b>Items Appealable to Council:</b>	<b>Last Day to Appeal:</b>	<b>Appealed:</b>
N/A	N/A	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<b>Location of Project (Include project titles, if any.)</b>		
<p>The area generally bounded by OLYMPIC BOULEVARD to the north, CHERRY STREET to the west, 11<sup>th</sup> STREET to the south, and FIGUEROA STREET to the east; the area generally bounded by 11<sup>th</sup> STREET to the north, FIGUEROA STREET to the west, PICO BOULEVARD to the south, and FLOWER STREET to the east; and the area generally immediately north of OLYMPIC BOULEVARD between GEORGIA STREET and FRANCISCO STREET, as well as between FIGUEROA STREET and OLYMPIC BOULEVARD.</p>		
<b>Name(s), Applicant / Representative, Address, and Phone Number.</b>		
<p>LA ARENA LAND COMPANY, LLC          TED TANNER          800 W. OLYMPIC BLVD. SUITE 305          LOS ANGELES, CA 90015          213-742-7870</p>		
<b>Name(s), Appellant / Representative, Address, and Phone Number.</b>		
<b>Final Project Description (Description is for consideration by Committee/Council, and for use on agendas and official public notices. If a General Plan Amendment and/or Zone Change case, include the prior land use designation and zone, as well as the proposed land use designation and zone change (i.e. "from Very Low Density Residential land use designation to Low Density land use designation and concurrent zone change from RA-1-K to (T)(Q)R1-1-K). In addition, for all cases appealed in the Council, please include in the description <u>only</u> those items which are appealable to Council.)</b>		
<p>Amendment of the LASED Specific Plan and Third Restated and Amended Development Agreement 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.</p>		
<b>Fiscal Impact Statement</b>	<b>Environmental No.</b>	<b>Commission Vote:</b>
<small>*Determination states administrative costs are recovered through fees.</small> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	ENV-2000-3577-3577-EIR & ADDENDUM	5-0

 JAMES WILLIAMS, Commission Executive Assistant I	Date: <b>DEC 22 2009</b>
---	--------------------------



# CITY OF LOS ANGELES PLANNING COMMISSION

200 N. Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300  
[www.lacity.org/PLN/index.htm](http://www.lacity.org/PLN/index.htm)

Determination Mailing Date: DEC 22 2009

**CASE NO. CPC-2009-2677-SPA-ZC-DA**  
**CEQA: ENV-2000-3577-EIR and Addendum**

**Location:** Various  
**Council District:** 9  
**Plan Area:** Central City  
**Request:** Specific Plan  
Amendment, Zone Change,  
Development Agreement

**Applicant:** L.A. Arena Land Company, LLC

**At its meeting on November 12, 2009, the following action was taken by the Los Angeles City Planning Commission:**

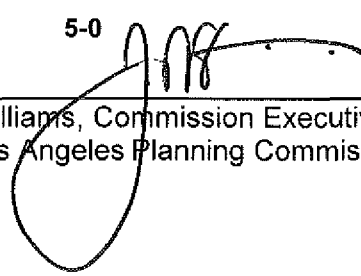
1. **Approved and Recommended** that the City Council **Adopt** the requested Specific Plan Amendments to the Los Angeles Sports and Entertainment District (LASED) Specific Plan.
2. **Approved and Recommended** that the City Council **Adopt** the requested Zone Change to the Olympic North properties from the C2-4D Commercial Zone to the "LASED" Zone and amend the boundaries of the Specific Plan Area to include these properties.
3. **Approved and Recommended** that the City Council **Adopt** the requested Amendment to the Third Amended and Restated Development Agreement.
4. **Recommended** that the City Council **Adopt** an ordinance, and subject to review by the City Attorney as to form and legality, authorizing the execution of the subject Amendment to the Third Amended and Restated Development Agreement.
5. **Adopted** the attached findings, including the related environmental finding that the Addendum to ENV-2000-3577-EIR, the Final Environmental Impact Report, demonstrates that there are no new significant environmental impacts associated with the project, is adequate environmental clearance for the subject requests.
6. **Advised** the applicant that, pursuant to California State Public Resources Code Section 21081.6, the City shall monitor or require evidence that mitigation conditions are implemented and maintained throughout the life of the project and the City may require any necessary fees to cover the cost of such monitoring.
7. **Advised** the applicant that pursuant to State Fish and Game Code Section 711.4, a Fish and Game Fee and / or Certificate of Fee Exemption is now required to be submitted to the County Clerk to or concurrent with the Environmental Notice of Determination (NOD) filing.

Fiscal Impact Statement: There is no General Fund impact as administrative costs are recovered through fees.

**This action was taken by the following vote:**

**Moved:** Roschen  
**Seconded:** Orozco  
**Ayes:** Freer, Kezios, Romero  
**Absent:** Burton, Cardoso, Woo  
**Vacant:** One

**Vote:** 5-0

  
\_\_\_\_\_  
James Williams, Commission Executive Assistant I  
City of Los Angeles Planning Commission

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

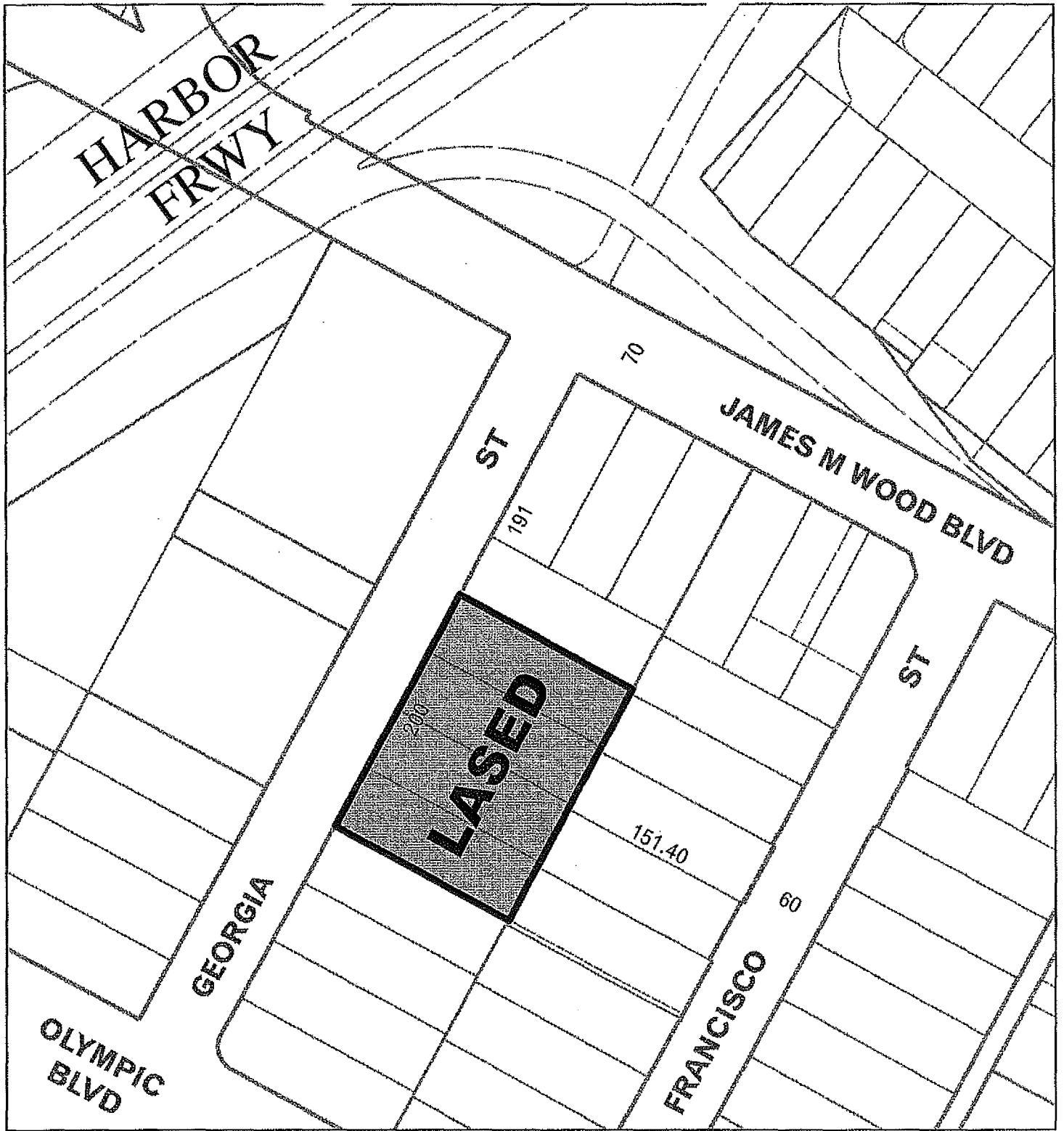
Attachments: Ordinance, Maps, Findings, Development Agreement  
City Planner: Craig Weber

**ORDINANCE NO. \_\_\_\_\_**

An ordinance amending Section 12.04 of the Los Angeles Municipal Code by amending the zoning map.

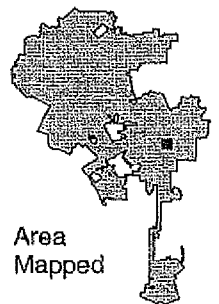
THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section \_\_. Section 12.04 of the Los Angeles Municipal Code is hereby amended by changing the zone classifications of property shown upon a portion of the Zoning Map incorporated therein and made a part of Article 2, Chapter 1 of the LAMC, so that such portion of the Zoning Map shall conform to the zoning on the map attached hereto and incorporated herein by this reference.



NOT TO SCALE

D.M. 129 A 207	CPC 2009-2677 SP ZC DA
AE/AA	082109



Area Mapped

Sec. \_\_\_\_\_. 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 \_\_\_\_\_.

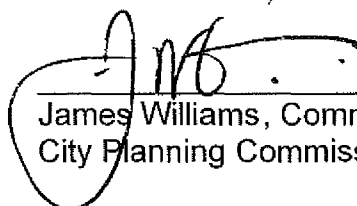
\_\_\_\_\_  
JUNE LAGMAY, City Clerk

By \_\_\_\_\_  
Deputy

Approved \_\_\_\_\_

\_\_\_\_\_  
Mayor

Pursuant to Section 558 of the City Charter,  
the City Planning Commission on November 12, 2009,  
recommended this ordinance be adopted by the City Council.

  
\_\_\_\_\_  
James Williams, Commission Executive Assistant I  
City Planning Commission

File No. \_\_\_\_\_

## 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 highrise 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 "ApprovedProject") 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 to accommodate an office structure would result in an 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 as allowed by the LAMC, 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 office 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.

*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 landuses 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 LASED. 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 LASED; 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 ProjectSite. 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 Variety 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 Variety 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.

ORDINANCE \_\_\_\_\_

An ordinance authorizing the execution of an Amendment to the Third Amended and Restated Development Agreement by and among the City of Los Angeles (the "City"), L.A. Arena Land Company, LLC ("LandCo"), Flower Holdings, LLC ("Flower Holdings"), Olympic and Georgia Partners, LLC ("OGP"), LA Live Theatre, LLC ("LA Live Theatre"), LA Live Properties, LLC ("LA Live Properties"), FIDM Residential, Inc. ("FIDM"), Figueroa South Land, LLC ("Figueroa South Land") and Fig Central Fee Owner, LLC ("Figueroa Central Owner") relating to real property in the Central City Community Plan area and within and adjacent to the Los Angeles Sports and Entertainment District Specific Plan area ("Amended Development Agreement"), which is hereby incorporated by reference.

WHEREAS, a Development Agreement between the City, LandCo and Flower Holdings was entered into on December 11, 2001 and recorded on December 18, 2001 in the Official Records of Los Angeles County, California as Instrument No. 01-2421128 after adoption by the City Council as Ordinance No. 174227 on September 4, 2001 (the "Development Agreement") as amended by Amendment to Development Agreement dated December 10, 2003, by and among City, LandCo and Flower Holdings and recorded in the Official Records of Los Angeles County, California as Instrument No. 2004-0100217 (as amended, the "Original Development Agreement"); and

WHEREAS, an Amended and Restated Development Agreement between the City, LandCo, Flower Holdings, FIDM, and Figueroa South Land was entered into on December 14, 2005 and recorded on December 19, 2005 in the official Records of Los Angeles County, California as Instrument No. 2005-3119740 after adoption by the City Council as Ordinance No. 177,020 on September 21, 2005; and

WHEREAS, a Second Amended and Restated Development Agreement between the City, LandCo, Flower Holdings, FIDM, and Figueroa South Land was entered into on May 22, 2007 and recorded on May 29, 2007 in the official Records of Los Angeles County, California as Instrument No. 2007-1291167 after adoption by the City Council as Ordinance No. 178,136 on December 12, 2006; and

WHEREAS, a Third Amended and Restated Development Agreement between the City, LandCo, Flower Holdings, OGP, LA Live Theatre, LA Live Properties, FIDM, Figueroa South Land and Figueroa Central Owner was entered into on April 2, 2008 and recorded on April 10, 2008 as Instrument No. 2008-0625541 after adoption by the City Council as Ordinance No. 179,414 on November 30, 2007; and

WHEREAS, OGP, LA Live Theatre, and LA Live Properties own certain property interests in the Development Agreement Property, and LandCo has partially assigned its rights to, and each of, OGP, LA Live Theatre and LA Live Properties have assumed LandCo's obligations under the Amended and Restated Development Agreement, as they relate to these properties; and

WHEREAS, Figueroa Central Owner owns certain property interests in the Development Agreement Property, and Land Co and Flower Holdings have assigned their rights to and

Figuroa Central Owner has assumed LandCo's and Flower Holdings' obligations under the Third and Restated Development Agreement, as they relate to these properties; and

WHEREAS, City, LandCo, Flower Holdings, OGP, LA Live Theatre, LA Live Properties, FIDM, Figuroa South Land, and Figuroa Central Owner, each parties to the Third Amended and Restated Development Agreement, wish to further amend the Development Agreement to conform the Development Agreement to the Los Angeles Sports and Entertainment District Specific Plan; and

WHEREAS, after due notice the City Planning Commission and the City Council did conduct public hearings on this matter; and

WHEREAS, pursuant to California Government Code Sections 65864 et seq. the City Planning Commission has transmitted its findings and recommendations; and

WHEREAS, the Amended Development Agreement is in the public interest and is consistent with the City's General Plan including the Central City Community Plan and the Los Angeles Sports and Entertainment District Specific Plan; and

WHEREAS, the City Council has reviewed and considered the Amended Development Agreement and the findings and recommendations of the City Planning Commission,

NOW, THEREFORE, THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section 1. The City Council finds and determines, that the development permitted by the zone changes, plan amendments and other approvals to which this Development Agreement relates were analyzed in Environmental Impact Report No. 2000-3577 (the "EIR"), which was certified as being prepared in compliance with the California Environmental Quality Act ("CEQA"), and which was processed under provisions of CEQA and City and State CEQA Guidelines. In addition, an addendum to the EIR has been prepared and adopted by the City Council. The EIR, addendum and findings constitute the environmental clearance for this ordinance.

Section 2. The City Council finds, with respect to the Amended Development Agreement that:

(a) It is consistent with the objectives, policies and programs specified in the General Plan, including the Central City Community Plan, and the Los Angeles Sports and Entertainment District Specific Plan ("Specific Plan"), and is compatible with the uses authorized in, and the regulations prescribed for, the zone in which the real property is located. Specifically, the Amended Development Agreement conforms the Development Agreement to the amendments to the Specific Plan;

(b) The intensity, building height and uses set forth in the Amended Development Agreement are permitted by and consistent with the Central City Community Plan and the Los Angeles Sports and Entertainment District Specific Plan.

(c) The Amended Development Agreement will not be detrimental to the public health, safety and general welfare since it encourages the construction of a project which is desirable and beneficial to the public. Furthermore, the Amended Development Agreement does not modify those provisions of the Development Agreement which specifically permit application to the project of rules and regulations under City Municipal Code Section 98.0605 to 91.101.1 relating to public health and safety;

(d) The Amended Development Agreement complies with all applicable City and State regulations governing development agreements;

(e) The Amended Development Agreement is necessary to strengthen the public planning process and to reduce the public and private costs of development uncertainty.

Section 3. The City Council hereby approves the Amended Development Agreement and authorizes and directs the Mayor to enter into said Amended Development Agreement in the name of the City of Los Angeles, and, further, directs the City Clerk to record said Amended Development Agreement and this ordinance with the County Recorder within ten (10) days of its effective date.

Section 4. The City Clerk shall certify to the passage of this ordinance and cause the same to be published in some daily newspaper printed and published in the City of Los Angeles.

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 \_\_\_\_\_

\_\_\_\_\_  
Antonio Villaraigosa, Mayor

Approved as to Form and Legality

\_\_\_\_\_  
CARMEN A. TRUTANICH, City Attorney

By \_\_\_\_\_

\_\_\_\_\_  
Assistant City Attorney

File No. \_\_\_\_\_

## AMENDMENT TO THIRD AMENDED AND RESTATED DEVELOPMENT AGREEMENT

This Amendment to the Third Amended and Restated Development Agreement ("Amendment") is executed this \_\_\_ day of \_\_\_\_\_ 2009 ("Effective Date"), by and among the CITY OF LOS ANGELES, a municipal corporation ("City"), L.A. ARENA LAND COMPANY, LLC, a Delaware limited liability company ("LandCo"), FLOWER HOLDINGS, LLC, a Delaware limited liability company ("Flower Holdings"), OLYMPIC AND GEORGIA PARTNERS, LLC, a Delaware limited liability company ("OGP"), LA LIVE THEATRE, LLC a Delaware limited liability company ("LA Live Theatre"), LA LIVE PROPERTIES, LLC, a Delaware limited liability company ("LA Live Properties"), FIDM RESIDENTIAL, INC., a California corporation ("FIDM"), FIGUEROA SOUTH LAND, LLC, an Oregon limited liability company ("Figueroa South Land"), and FIG CENTRAL FEE OWNER, LLC a Delaware limited liability company ("Figueroa Central Owner") and collectively with City, LandCo, Flower Holdings, OGP, LA Live Theatre, LA Live Properties, FIDM and Figueroa South Land (the "Parties") pursuant to California Government Code Section 65868, and the implementing procedures of the City.

### RECITALS

A. City, LandCo and Flower Holdings entered into that certain Development Agreement dated December 11, 2001 and recorded on December 18, 2001 in the Official Records of Los Angeles County, California, as Instrument No. 01-2421128 (the "Development Agreement") after adoption by the City Council as Ordinance No. 174227 on September 4, 2001, as amended by Amendment to Development Agreement dated December 10, 2003, by and among City, LandCo and Flower Holdings and recorded in the Official Records of Los Angeles County, California as Instrument No. 04-0100217 (as amended, the "Original Development Agreement").

B. The Original Development Agreement was amended and restated in its entirety by that Amended and Restated Development Agreement dated December 14, 2005 by and among the City, LandCo, Flower Holdings, FIDM and Figueroa South Land and recorded on December 19, 2005 in the Official Records of Los Angeles County, California, as Instrument No. 053119740. The Original Development Agreement was further amended and restated in its entirety by that Second Amended and Restated Development Agreement dated May 22, 2007 by and among the City, LandCo, Flower Holdings, FIDM, and Figueroa South Land and recorded on May 29, 2007 in the Official Records of Los Angeles County, California as Instrument No. 2007-1291167. The Original Development Agreement was further amended and restated in its entirety by that Third Amended and Restated Development Agreement dated April 2, 2008 by and among the City, LandCo, Flower Holdings, OGP, LA Live Theatre, LA Live Properties, FIDM, Figueroa South Land and Figueroa Central Owner. The Original Development Agreement as amended and restated shall be hereinafter referred to as the "Amended and Restated Development Agreement."

C. The Parties desire to enter into this Amendment, pursuant to Section 6.8 of the Amended and Restated Development Agreement, to expand the Development Agreement Property to include four additional adjacent parcels owned by LandCo, identified as APN 5138-

005-032, north of and immediately adjacent to the Olympic North Properties as identified on Attachment 3 (the "Additional Parcels"); increase the maximum permitted floor area of the LASED Specific Plan Properties to provide for additional office, production and broadcast studio uses; increase the maximum height permitted on the expanded Olympic North Properties; and to make other minor modifications.

NOW, THEREFORE, in consideration of the foregoing, the mutual covenants and conditions herein, and other valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties hereby agree to amend the Amended and Restated Development Agreement as follows:

Section 1. Olympic North Properties. To accommodate the expansion of the Olympic North Properties to include the Additional Parcels and additional development within the Olympic North Properties, Sections 1.12, 1.15, 1.21, 1.30 and 3.2.3.1 and Attachments 1 and 2 of the Amended and Restated Development Agreement shall be amended for the Olympic North Properties as follows:

(a) Section 1.12 is hereby amended to add "the Fifth Implementation of the DDA, the Sixth Implementation of the DDA, the Seventh Implementation of the DDA" after "the Fourth Implementation of the DDA".

(b) To include the additional 0.7 acres of the Additional Parcels into the Development Agreement Property, Section 1.15 is hereby amended by replacing "27.1 acres" with "27.8 acres".

(c) Section 1.21 is hereby amended to replace "Ordinance No. 178134" with "Ordinance No. [xxx]".

(d) To include the additional floor area and acreage permitted within the Development Agreement Property and clarify the uses permitted within the Development Agreement Property, Section 1.30 is hereby amended by replacing "5,977,806 square feet of floor area" with "6,290,018 square feet of floor area", replacing "27.1 acres" with "27.8 acres", and adding "production and broadcast studio," after "office space, including".

(e) To clarify the Applicable Rules for the Additional Parcels, as defined below, Section 2.3.1 is hereby amended to add "(3) reduced in density, intensity or use from what is set forth in the Applicable Rules for the Additional Parcels as of the Effective Date;" and to renumber the previous subsequent subsections (3) and (4) to (4) and (5) respectively.

(f) Attachment 1 is hereby replaced with Attachment 1 of this Amendment, entitled Development Agreement Property.

(g) Attachment 2 is hereby replaced with Attachment 2 to this Amendment, entitled LASED Specific Plan Properties.



(h) Applicable Rules.

(i) Development Agreement Properties Other than the Additional Parcels. For the Development Agreement Properties other than the Additional Parcels, the Applicable Rules are set forth in Section 1.4 of the Amended and Restated Development Agreement. Pursuant to Section 1.4, the amendments to the LASED Specific Plan and Los Angeles Municipal Code adopted concurrent with the adoption of this Amendment shall be included within the Applicable Rules as if such amendments were in effect as of the Original Effective Date.

(ii) Additional Parcels. For the Additional Parcels, the Applicable Rules are the rules, regulations, ordinances and officially adopted policies of the City in force as of the Effective Date, including but not limited to the LASED Specific Plan and the Municipal Code. Notwithstanding the language of this Section or any other language in this Agreement, all specifications, standards and policies regarding the design and construction of public works facilities, if any, shall be those that are in effect at the time the applicable Project plans are being processed for approval and/or under construction. Further, the Applicable Rules shall include (i) the Citywide programs which will be enacted after the Effective Date, for storm water pollution abatement mandated by the Federal Water Pollution Control Act of 1972, and subsequent amendments to the Act; and (ii) a change in the downtown parking requirements if ultimately adopted by the City Council after the Effective Date to the extent the change is consistent with the Central City Community Plan Update as recommended by City Planning Commission action, dated November 12, 1998, CPC No. 94-0225CAU.

Section 2. City Procedures and Actions.

(a) Planning Commission Action. The Planning Commission held a duly noticed public hearing on [November 12, 2009], and recommended approval of this Amendment on the same date.

(b) City Council Action. The City Council on [xxx], after conducting a duly noticed public hearing, adopted Ordinance No. [xxx], to become effective on the thirty-first day after publication, or on the forty-first day after posting, approving this Amendment, found that its provisions are consistent with the City's General Plan, the Central City Community Plan, the LASED Specific Plan, and the Municipal Code, and authorized the execution of this Amendment.

Section 3. Notices. Any notices, demands and communications directed to LandCo, Flower Holdings, OGP, LA Live Theater, or LA Live Properties pursuant to the Amended and Restated Development Agreement or this Amendment shall be delivered to the following addresses, respectively, in conformance with the provisions of Section 6.15 of the Amended and Restated Development Agreement:

If to LandCo:

Mr. Ted Tanner  
L.A. Arena Land Company, LLC  
800 West Olympic Boulevard, Suite 305  
Los Angeles, California 90015

with copies to:

Mr. Eduardo Cervantes  
L.A. Arena Land Company, LLC  
714 West Olympic Boulevard, Suite 401  
Los Angeles, California 90015

Mr. David A. Goldberg, Esq.  
Latham & Watkins  
355 South Grand Avenue  
Los Angeles, California 90071

If to Flower Holdings:

Mr. Ted Tanner  
Flower Holdings, LLC  
800 West Olympic Boulevard, Suite 305  
Los Angeles, California 90015

with copies to:

Mr. Eduardo Cervantes  
Flower Holdings, LLC  
714 West Olympic Boulevard, Suite 401  
Los Angeles, California 90015

Mr. David A. Goldberg, Esq.  
Latham & Watkins  
355 South Grand Avenue  
Los Angeles, California 90071

If to OGP:

Mr. Ted Tanner  
Olympic and Georgia Partners, LLC  
800 West Olympic Boulevard, Suite 305  
Los Angeles, California 90015

with copies to:

Mr. Eduardo Cervantes  
Olympic and Georgia Partners, LLC  
714 West Olympic Boulevard, Suite 401  
Los Angeles, California 90015

Mr. David A. Goldberg, Esq.  
Latham & Watkins  
355 South Grand Avenue  
Los Angeles, California 90071

If to LA Live Theatre:

Mr. Ted Tanner  
LA Live Theatre, LLC  
800 West Olympic Boulevard, Suite 305  
Los Angeles, California 90015

with copies to:

Mr. Eduardo Cervantes  
LA Live Theatre, LLC  
714 West Olympic Boulevard, Suite 401  
Los Angeles, California 90015

Mr. David A. Goldberg, Esq.  
Latham & Watkins  
355 South Grand Avenue  
Los Angeles, California 90071

If to LA Live Properties:  
Mr. Ted Tanner  
LA Live Properties, LLC  
800 West Olympic Boulevard, Suite 305  
Los Angeles, California 90015

with copies to:  
Mr. Eduardo Cervantes  
LA Live Properties, LLC  
714 West Olympic Boulevard, Suite 401  
Los Angeles, California 90015

Mr. David A. Goldberg, Esq.  
Latham & Watkins  
355 South Grand Avenue  
Los Angeles, California 90071

Section 4. Effectiveness of Amendment. This Amendment is dated for convenience only and shall only become effective on the date which is the latest of (i) the date this Amendment is executed by LandCo, Flower Holdings, OGP, LA Live Theatre, LA Live Properties, FIDM, Figueroa South Land and Figueroa Central Owner and (ii) the date this Amendment is approved and executed by the City.

Section 5. Counterparts. This Amendment may be executed in counterparts, each of which shall be deemed an original but all of which together shall constitute one and the same agreement.

Section 6. No Other Changes, Consistency. Notwithstanding any changes and deletions contained herein, all other provisions of the Amended and Restated Development Agreement remain the same. In the event of any conflict between the terms of the Amended and Restated Development Agreement and this Amendment, the terms of this Amendment shall govern.

Section 7. Severability. If any provision of this Amendment should be determined by a court to be invalid or unenforceable, the remaining provisions of this Amendment shall remain in full force and effect and continue to be binding on both Parties.

IN WITNESS WHEREOF, the Parties hereto have executed this Amendment as of the date first written above.

“City”

CITY OF LOS ANGELES, a municipal corporation of the State of California

APPROVED AS TO FORM:  
Carmen Trutanich,  
City Attorney

By: .....  
Antonio Villaraigosa, Mayor

By: .....  
Laura Cadogan  
Deputy City Attorney  
DATE: ....., 2009

ATTEST:  
Frank T. Martinez, City Clerk

L.A. Arena Land Company, LLC  
a Delaware limited liability company

By: .....  
.....Deputy  
DATE: ....., 2009

APPROVED AS TO FORM:

By: .....  
Name: David A. Goldberg  
of Latham & Watkins LLP

By: .....  
Name: Ted Tanner  
Title: Vice President

Counsel for L.A. Arena Land Company, LLC

Flower Holdings, LLC,  
a Delaware limited liability company

APPROVED AS TO FORM:

By: .....  
Name: David A. Goldberg  
of Latham & Watkins LLP

By: .....  
Name: Ted Tanner  
Title: Vice President

Counsel for Flower Holdings, LLC

Olympic and Georgia Partners, LLC,  
a Delaware limited liability company

By: .....  
Name: Ted Tanner  
Title: Vice President

LA Live Theatre, LLC  
a Delaware limited liability company

By: .....  
Name: Ted Tanner  
Title: Vice President  
LA Live Properties, LLC, a Delaware  
limited liability company

By: .....  
Name: Ted Tanner  
Title: Vice President

FIDM Residential, Inc.

By: .....  
Name:  
Title:

Figueroa South Land LLC, an Oregon limited  
liability company

By: Figueroa South Development Limited  
Partnership, an Oregon limited partnership,  
its Manager

By: WDD California, Inc., an Oregon  
corporation, its General Partner

By: .....  
Name: Gary A. Finicle  
Title: Secretary/Treasurer

APPROVED AS TO FORM:

By: .....  
Name: David A. Goldberg  
of Latham & Watkins LLP

Counsel for Olympic and Georgia Partners,  
LLC

APPROVED AS TO FORM:

By: .....  
Name: David A. Goldberg  
of Latham & Watkins LLP

Counsel for LA Live Properties, LLC

By: .....  
Name:  
Counsel for FIDM Residential, Inc.

By: .....  
Name:  
Counsel for Figueroa South Land, LLC

Fig Central Fee Owner LLC, a Delaware  
limited liability company

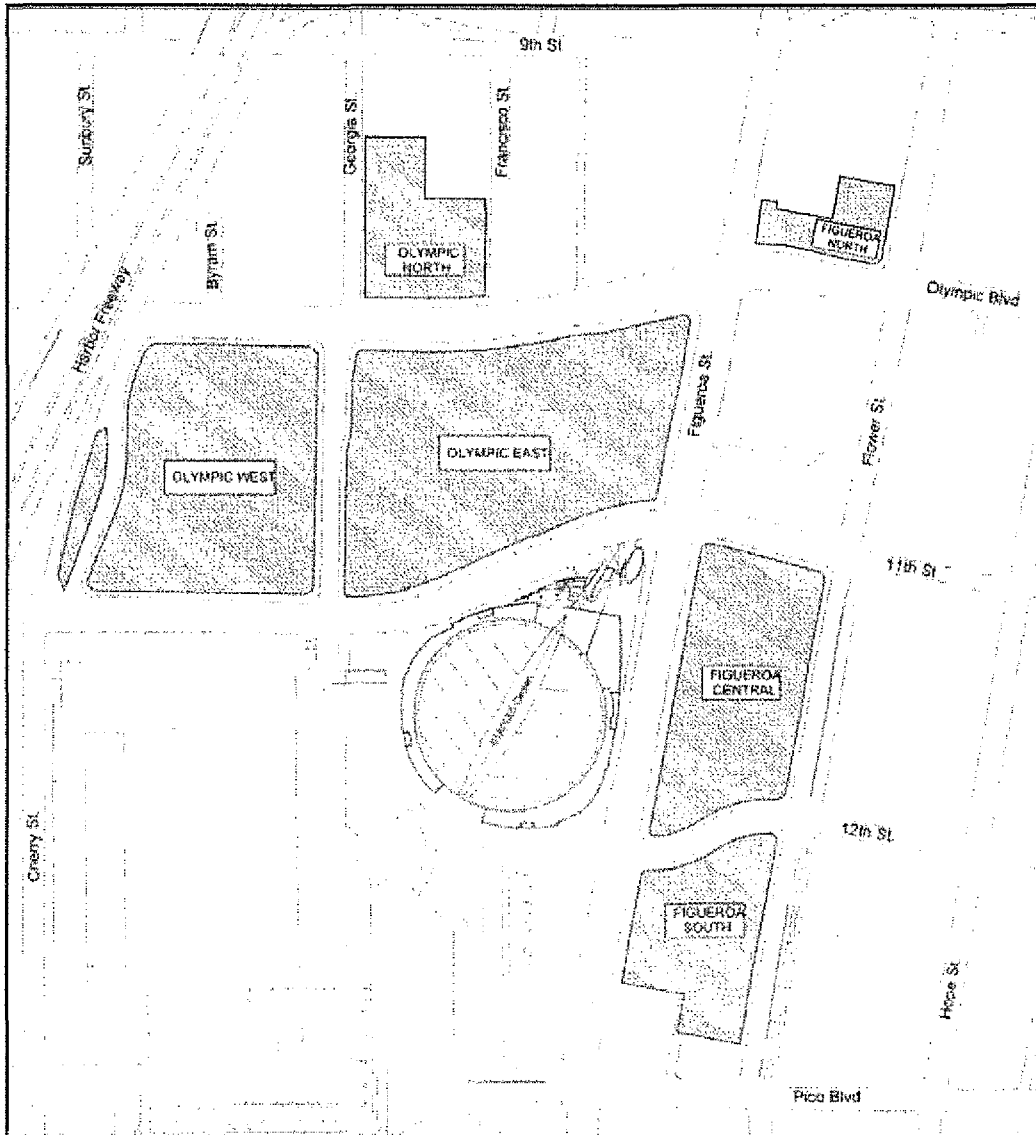
APPROVED AS TO FORM:

By: .....  
Name: Oskar Brecher  
Title: Authorized Signatory

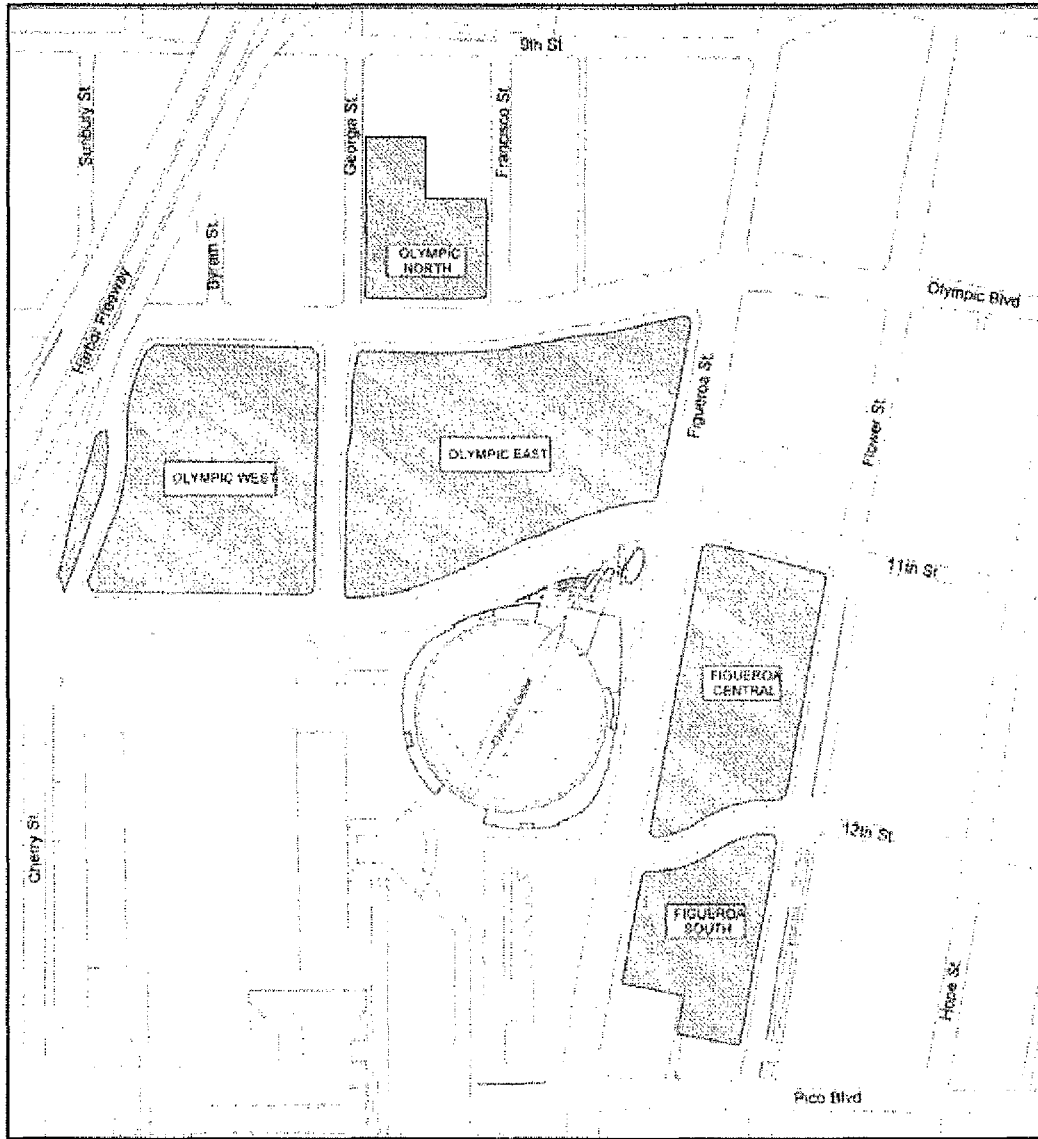
By: .....  
Name: John W. Whitaker  
of DLA Piper US LLP

Counsel for Fig Central Fee Owner LLC

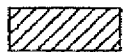
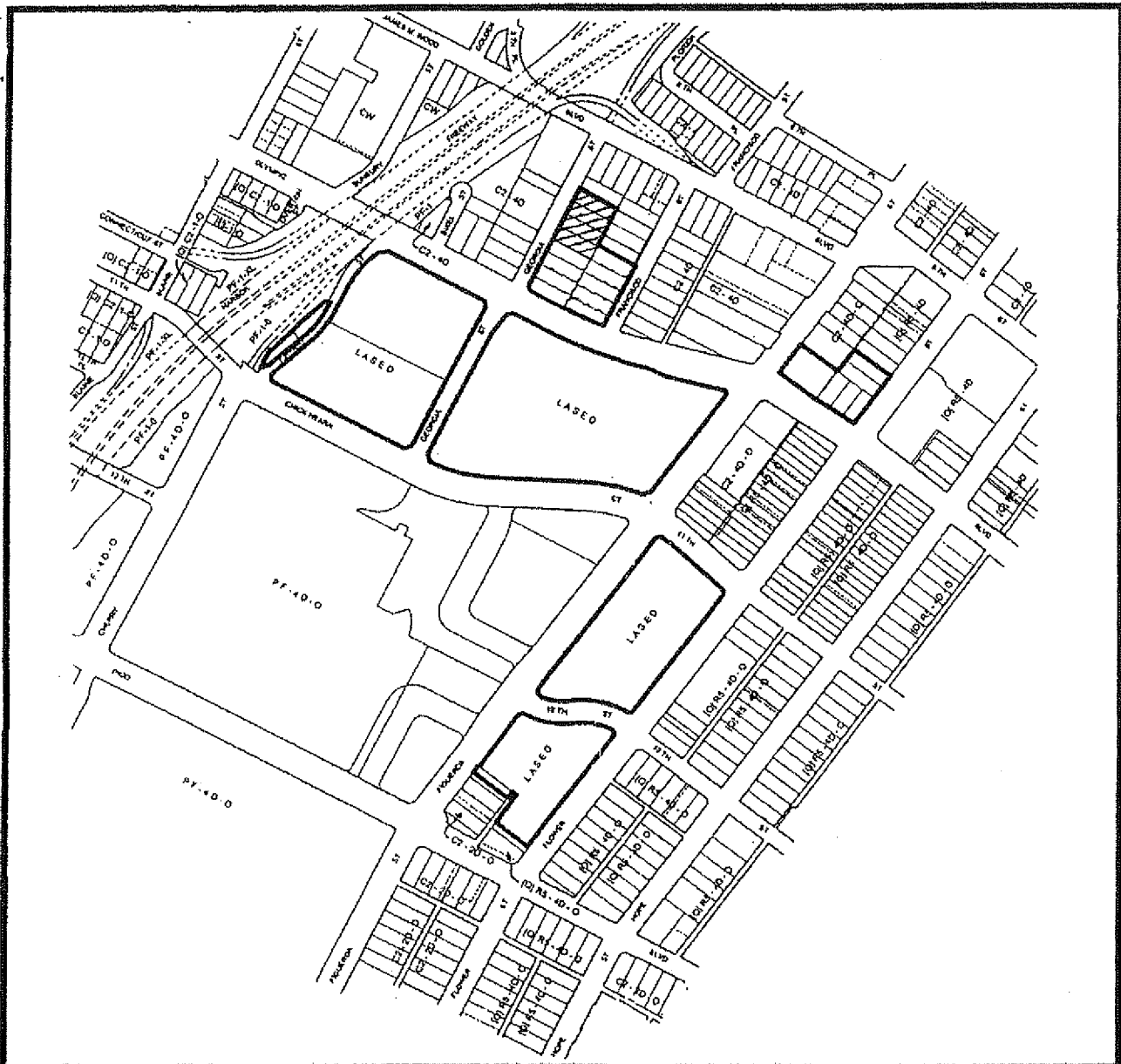
ATTACHMENT 1  
DEVELOPMENT AGREEMENT AREA MAP



ATTACHMENT 2  
Los Angeles Sports and Entertainment District  
Specific Plan Map

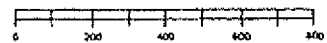




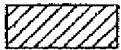
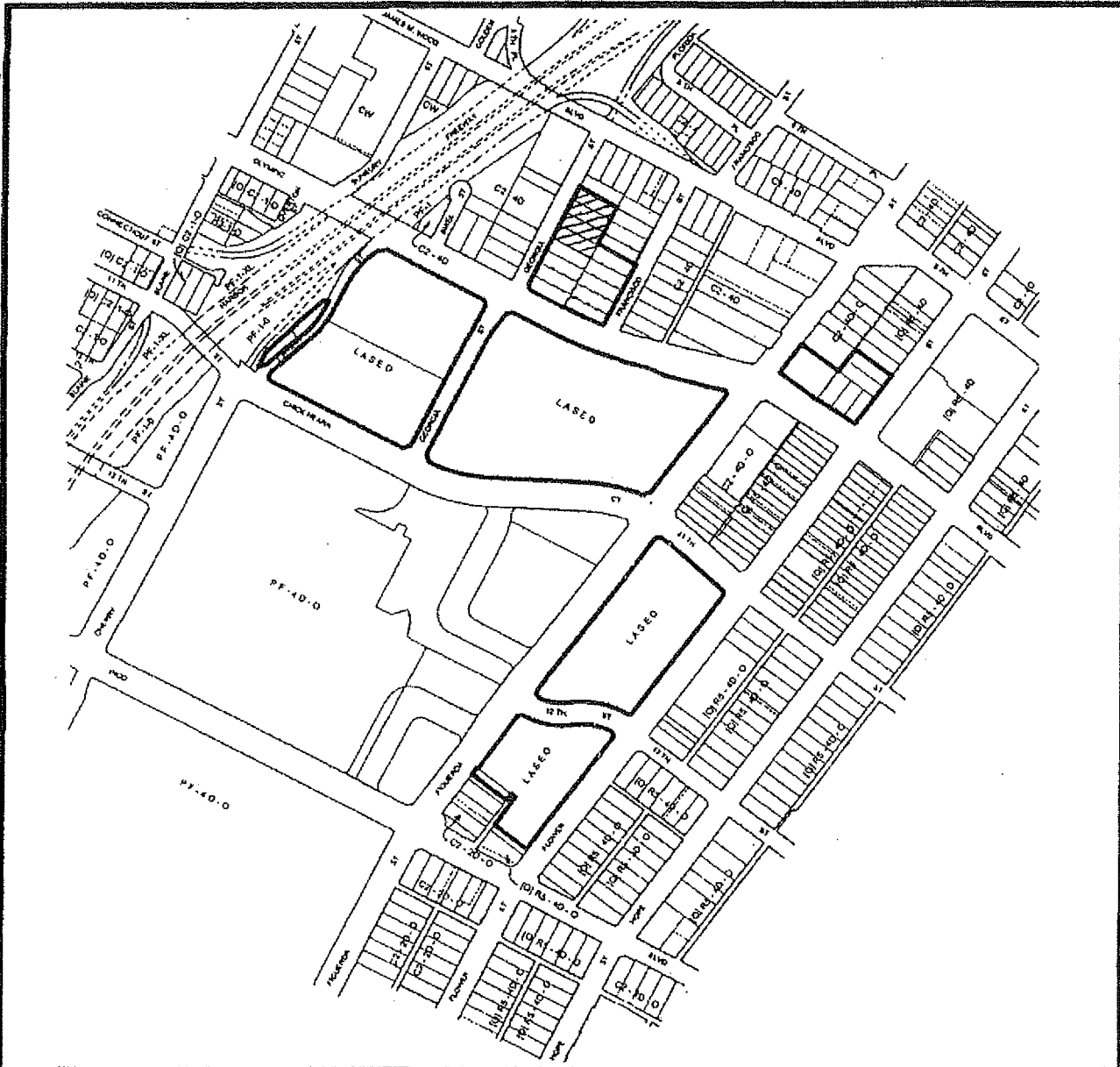


Additional Parcels

SCALE:

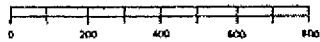


Attachment 3  
 Additional Parcels to be Added to Development Agreement Property



Additional Parcels

SCALE:



Attachment 3  
 Additional Parcels to be Added to Development Agreement Property

**DETERMINATION LETTER  
CPC-2009-2677-SPA-ZC-DA  
MAILING DATE: 12/22/09**

Latham & Watkins, LLP  
Attn: Robert Smith  
355 S. Grand Avenue  
Los Angeles, CA 90071

Central City Association  
Attn: Carol Schatz  
626 Wilshire Blvd., Suite 200  
Los Angeles, CA 90017

The Mobility Group  
Attn: Michael Bates  
18301 Von Karman, Suite 580  
Irvine, CA 92612

Beverly Kenworthy  
350 S. Bixel  
Los Angeles, CA 90036

Ann Nguyen  
626 Wilshire Blvd., #200  
Los Angeles, CA 90017

Council Member Jan Perry  
Ninth Council District  
City Hall, Room 420  
**Mail Stop #215**

Fae Tsukamoto- G.I.S Section  
200 N. Spring St., Room 825  
**Mail Stop #395**

FIRE  
MARYLOU.NAJERA@LACITY.ORG

LA Arena Land Company, LLC  
Ted Tanner  
800 W. Olympic Blvd., Suite 305  
Los Angeles, CA 90015

Latham & Watkins, LLP  
Attn: David Goldberg  
355 S. Grand Avenue  
Los Angeles, CA 90071

The Salvation Army  
Attn: Michael J. Woodruff  
180 E. Ocean Blvd.  
Long Beach, CA 90802

Local 33  
Attn: William F. Raleigh  
1720 W. Magnolia Blvd.  
Burbank, CA 91506

Shiraz Taneri  
114 W. 5<sup>th</sup> Street  
Los Angeles, CA 90013

LADOT  
Attn: Jay Kim  
100 S. Main Street, 10<sup>th</sup> Floor  
Los Angeles, CA 90012  
**Mail Stop #725**

Office of the Mayor  
Attn: Michelle Cervera  
200 N. Spring Street, 13<sup>th</sup> Floor  
Los Angeles, CA 90012  
**Mail Stop #370**

TRANSPORTATION  
TAIMOUR.TANAVOLI@LACITY.ORG

STREET SERVICES  
GREG.MONFETTE@LACITY.ORG

Downtown LA NC  
Attn: Russell Brown  
P.O. Box 13096  
Los Angeles, CA 90013

Craig Weber  
2055 Yosemite Dr.  
Los Angeles, CA 90041

Southpark Stakeholders Group  
Attn: Mike Pfeiffer  
900 Wilshire Blvd., Suite 624  
Los Angeles, CA 90017

Matrix Environmental  
Attn: Bruce Lacklow  
6701 Center Dr., Suite 900  
Los Angeles, CA 90045

Maya Zutler  
5121 Van Nuys Blvd., #203  
Sherman Oaks, CA 91403

LADOT  
Attn: Tomas Carranza  
100 S. Main Street, 9<sup>th</sup> Floor  
Los Angeles, CA 90012  
**Mail Stop #725**

Craig Weber  
City Planner  
City Hall, Room 667  
**Mail Stop #395**

ENGINEERING  
QUYEN.PHAN@LACITY.ORG

LIAISON  
NELSON.LARIOS@LACITY.ORG  
TONY.STAPLES@LACITY.ORG  
IRIS.FAGAR-AWAKUNI@LACITY.ORG

# LOS ANGELES CITY PLANNING DEPARTMENT RECOMMENDATION REPORT

## CITY PLANNING COMMISSION

DATE: **November 12, 2009**  
TIME: **after 8:30 a.m.\***  
PLACE: **Los Angeles City Hall  
200 N Spring Street  
10<sup>th</sup> Floor  
Los Angeles, CA 90012**

Public Hearing completed on September 30, 2009  
Expiration Date: November 15, 2009

CASE NO. **CPC-2009-2677-SPA-ZC-DA**  
SPECIFIC PLAN AMENDMENT, ZONE CHANGE  
DEVELOPMENT AGREEMENT AMENDMENT,  
CEQA: ENV-2000-3577-EIR & Addendum  
Incidental Cases: None  
Related Cases: CPC-2000-5433-DA-GPA-SP-SUB-ZC  
Council District: 9  
Plan Area: Central City  
Specific Plan: Los Angeles Sports and Entertainment  
District  
Neighborhood Council: Downtown Los Angeles  
Plan Land Use: Regional Commercial and High Density  
Residential  
Zone: LASED, C2-4D  
Applicant: L.A. Arena Land Company, LLC.

## Project Location

The area generally bounded by Olympic Boulevard to the north, Cherry Street to the west, 11<sup>th</sup> Street to the south, and Figueroa Street to the east; the area generally bounded by 11<sup>th</sup> Street to the north, Figueroa Street to the west, Pico Boulevard to the south, and Flower Street to the east; and the area generally immediately north of Olympic Boulevard between Georgia Street and Francisco Street, as well as between Figueroa Street and Olympic Boulevard.

## Proposed Project

Amendment of the LASED Specific Plan and Third Restated and Amended Development Agreement 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.

## Requested Actions

1. An Addendum to the Los Angeles Sports and Entertainment District Final EIR (ENV-2000-3577-EIR) which demonstrates that the Project would not result in any additional significant environmental impacts nor would it increase the severity of previously anticipated significant impacts.
2. Pursuant to Sections 11.5.7 and 12.32(C)(7) of the Municipal Code, a Specific Plan Amendment to the Los Angeles Sports and Entertainment District (LASED) Specific Plan (Ordinance No. 174,224, previously amended by Ordinance Nos. 178,134, and 179,413) to:
  - a. Increase the maximum permitted floor area for the overall Specific Plan area from 5,515,101 square feet to 5,827,313 square feet;
  - b. Increase the maximum allowable development on Development Site 12 from 500,000 square feet to 897,550 square feet.
  - c. Allow development of office uses, broadcasting and production studio uses on the Olympic North subarea;
  - d. Decrease the permitted floor area for Development Sites 1 and 2 within the Olympic West and Olympic East Subareas (collectively from 1,691,000 square feet to 1,605,662 square feet);
  - e. Decrease the maximum number of hotel rooms and residential units permitted for Development Site 2 on the Olympic East Subarea (from 1,080 hotel rooms to 1,001 hotel rooms and from 225 dwelling units to 224 dwelling units);
  - f. Increase the maximum height allowed in the Olympic North Subarea from 200 feet to 350 feet;
  - g. Expand the Specific Plan area to include four adjacent parcels located north of the current Olympic North Subarea; and
  - h. Incorporate into the Specific Plan other minor modifications and clarifications.
3. Pursuant to Section 12.32(C)(7) of the Municipal Code, a Zone Change to the four adjacent parcels located north of the current Olympic North Subarea from the C2-4D Commercial Zone to the "LASED" zone to add the parcels to the Specific Plan area.

4. Pursuant to Section 65868 of the State Government Code and the City implementing procedures, an Amendment to the Third Amended and Restated Development Agreement to bring the Development Agreement into consistency with this action.

**Recommended Actions:**

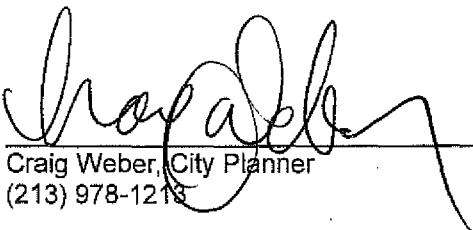
1. **Approve and Recommend** that the City Council **Adopt** the requested Specific Plan Amendments to the Los Angeles Sports and Entertainment District (LASED) Specific Plan.
2. **Approve and Recommend** that the City Council **Adopt** the requested Zone Change to the Olympic North properties from the C2-4D Commercial Zone to the "LASED" Zone and amend the boundaries of the Specific Plan Area to include these properties.
3. **Approve and Recommend** that the City Council **Adopt** the requested Amendment to the Third Amended and Restated Development Agreement, as modified.
4. **Recommend** that the City Council **Adopt** an ordinance, and subject to review by the City Attorney as to form and legality, authorizing the execution of the subject Amendment to the Third Amended and Restated Development Agreement.
5. **Adopt** the attached findings, including the related environmental finding that Addendum prepared to the Final Environmental Impact Report, ENV-2000-3577-EIR, for this action is adequate environmental clearance for the subject requests.
6. **Advise** the applicant that, pursuant to California State Public Resources Code Section 21081.6, the City shall monitor or require evidence that mitigation conditions are implemented and maintained throughout the life of the project and the City may require any necessary fees to cover the cost of such monitoring.
7. **Advise** the applicant that pursuant to State Fish and Game Code Section 711.4, a Fish and Game Fee and / or Certificate of Fee Exemption is now required to be submitted to the County Clerk to or concurrent with the Environmental Notice of Determination (NOD) filing.

S. Gail Goldberg, AICP  
Director of Planning



---

Kevin Keller, Senior City Planner



---

Craig Weber, City Planner  
(213) 978-1218

**ADVICE TO PUBLIC:** \*The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the *Commission Secretariat, Room 210, City Hall, 200 North Spring Street, Los Angeles, CA 90012* (Phone No. 213-978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent to the week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to this programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request not later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1300.

## TABLE OF CONTENTS

Project Analysis	Page A-1
Project Summary	
Project Description	
Background	
Issues	
Conclusion	
Findings	Page F-1
Specific Plan Amendment and Zone Change Findings	
Development Agreement Amendment Findings	
CEQA Findings	
Public Hearing and Communications	Page P-1
Exhibits:	
A: Maps	
A-1 – Vicinity Map	
A-2 – Radius Map	
A-3 – Specific Plan Map	
B: Proposed Amended Los Angeles Sports and Entertainment District Specific Plan	
C: Proposed Amendment to the Third Amended and Restated Development Agreement, with Development Agreement Attachments:	
Attachment 1: Development Agreement Area Map (map updated)	
Attachment 2: Los Angeles Sports and Entertainment District Specific Plan Map (map updated)	
Attachment 3: Los Angeles Sports and Entertainment District Streetscape Plan (unchanged)	
Attachment 4: Community Benefits Program (unchanged)	
Attachment 5: Conditions for On-Site Consumption Permits (unchanged)	
Attachment 6: Implementation of Affordable Housing Program (unchanged)	
D: Draft Zone Change Ordinance	
E: Draft Ordinance amending the Third Amended and Restated Development Agreement	
F: Conceptual Plan for proposed production/office tower and proposed hotel/residential tower	
G: Environmental Clearance: Addendum to ENV-2000-3577-EIR	
H: Correspondence Received	

## PROJECT ANALYSIS

### Project Summary

The proposal involves three main components, each with sub-elements:

**I. An Amendment to the Los Angeles Sports and Entertainment District Specific Plan;**

The proposed amendments to the provisions of the LASED Specific Plan effect the following Specific Plan provisions:

**A. Floor Area**

- Increase the maximum permitted floor area for the overall Specific Plan;
- Decrease the permitted floor area for specified development sites while increasing the permitted floor area for other specified development sites.

**B. Uses**

- Allow development of office uses, broadcasting and production studio uses on the Olympic North subarea;
- Decrease maximum number of hotel rooms and residential units permitted for a specified development site while increasing the number of hotel rooms and residential units permitted for other specified development sites;

**C. Height**

- Increase the maximum height allowed in the Olympic North Subarea

**D. Geographic Expansion**

- Expand the Specific Plan area to include certain parcels located north of the current Olympic North Subarea; and

**II. A Zone Change to add the Olympic North properties into the Specific Plan;**

**III. An Amendment to the Third Restated and Amended Development Agreement.**

### Project Description

**I. An Amendment to the Los Angeles Sports and Entertainment District Specific Plan;**

**A. Floor Area Increase**

This amendment increases 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 (85,338 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 Specific Plan has both a maximum square footage as well as a trip cap, which is contained within the Specific Plan Equivalency Matrix. The Specific Plan Equivalency Matrix in concert with the Final EIR allows for the transfer and exchange of land uses within the district, and provides a regulated framework of exchange rates and floor area transfer policy. The proposed Specific Plan, as amended, permits a greater total square footage of development. By shifting the types and amounts of land uses permitted, the Specific Plan remains within the envelope of the original approved trips as analyzed in the 2001 approval and the overall floor area ratio (FAR) remains below the 6:1 allowed for the Plan Area as a whole.

#### **B. Uses**

The amendment to the Specific Plan introduces new uses to Development Site 12 at the Olympic North Subarea. Currently the Subarea and the Development Site are planned for hotel uses (400 rooms at 350,000 square feet) and residential uses (100 dwelling units at 150,000 square feet). The Amendment would allow for broadcasting and production studio uses at the Site (269,182 square feet) along with general office uses (332,618 square feet). To keep the project within the square footage and trip thresholds analyzed by the project EIR the project would also include a diminishment of hotel uses at Development Site 12 (down to 275 rooms at 206,500 square feet) and a diminishment of residential uses at Development Site 12 (down to 65 dwelling units at 89,250 square feet). The project also involves the transfer of 89,696 square feet of unused hotel floor area and 895 square feet of unused residential floor area from Development Sites 1 and 2 to Development Site 12. A maximum of 1,200 hotel rooms are required to be built within the Plan Area, and the proposed amendment does not conflict with this requirement. The existing Convention Hotel will have 1,001 hotel rooms, and the revised allowance for hotel rooms at Olympic North would provide a cumulative total of 1,276 rooms. Furthermore, the Figueroa Central subarea has been approved to provide 222 hotel rooms. The Amendment facilitates the anticipated development of a broadcast facility with related production, studio and office uses for a nationwide cable television network while still allowing for the completion of a third hotel tower with accompanying residential uses.

#### **C. Height**

The amendment to the Specific Plan increases the currently existing height limit at the Olympic North subarea from 200 feet to 350 feet. The Specific Plan currently imposes unique height limits to each of the various subareas with allowed heights ranging from 150 feet at the Olympic West subarea (currently developed with a parking garage, cinema and conference center) to 600 feet at the Olympic East subarea (currently developed with a convention hotel and LA Live complex). The Figueroa Central and Figueroa South subareas, which are currently undeveloped, are permitted 575 feet and 400 feet in height respectively. The majority of the surrounding parcels, outside of the LASED Specific Plan, are within a 4D Height District and are unlimited with respect to height.

#### **D. Geographic Expansion**



The amendment to the Specific Plan expands the geographic boundaries of both the Olympic North subarea and the Specific Plan as a whole. Currently, the Olympic North Subarea consists of Lots 8,9, 10, 11, 12, 39, 40 and 44 as shown on Re-subdivision of the Francisco Tract being the subdivision of Part of Lot 1, Block 35 Hancock's Survey. The expansion brings Lots 20, 21, 22 and 23 as shown on F.J. Nettleton's Subdivision of the Ellis Tract. The expansion brings four parcels, or approximately 29,576 square feet of additional land into the Specific Plan. Exhibit D, the Draft Zone Change Ordinance shows those parcels that would be newly included in the Specific Plan area.

## **II. Zone Change to add the Olympic North properties into the Specific Plan.**

The proposed zone change applies to those four parcels identified as the Lots 20, 21, 22 and 23 as shown on F.J. Nettleton's Subdivision of the Ellis Tract. The four parcels would be re-zoned from C2-4D to LASED. The zone change brings these properties into the Specific Plan, Olympic North Subarea, Development Site 12, subject to all provisions therein, excluding the sign provisions expressed in Section 16 of the Specific Plan.

## **III. An Amendment to the Amended and Restated Development Agreement**

The recommended amendments to the Amended and Restated Development Agreement are intended to bring the Development Agreement into conformance with the amendments to the Specific Plan. The amendments do not impact any obligations or public requirements under the Development Agreement. The developer's obligations as outlined under the Community Benefits Agreement remain unchanged.

### Background

The Los Angeles Sports and Entertainment District (LASED) Specific Plan was approved in 2001, and became the first Specific Plan within the Central City area. Developed in partnership with the Community Redevelopment Agency, the Specific Plan was created to build off the success of the adjacent Staples Center which itself broke ground in 1998 and opened in 1999.

A driving goal of the LASED was the development of services and amenities to complement the existing Convention Center and build off the success of Staples Center to create a regional sports and entertainment district. A central component of the LASED was the inclusion of a major Convention Center Hotel, which had been planned in various capacities over the years but had never materialized. The Convention Center Hotel would be critical in driving convention business to Los Angeles and help create a favorable climate for the renaissance of the under-performing Convention Center.

### *Development of the Olympic East and West Subareas*

Actual development within the District began in 2005, with the approval of a 7,100 seat live theater. The Nokia Theater is currently in operation on Specific Plan Parcels 4 and 5, directly across from the Staples Center and hosts a wide range of live concerts, award shows and other similar events.

Approval of the Nokia Theatre was followed by the approval for the primary subterranean parking structure for the "LA Live" project. This structure, which broke ground in 2005, currently provides parking and truck access in a multi-level underground structure for the various uses associated with the LA Live campus. In 2006 a subsequent approval was granted for the Olympic West parking structure which is also in operation today. The Olympic West structure includes one level of above-grade parking and is located beneath the air-space expansion area for the Los Angeles Convention Center.

Late 2006 and early 2007 also saw the approval and construction of LA Live Buildings 'A' and 'B' and the Central Plaza. Buildings 'A' and 'B' are multi-level structures that include various restaurant uses at ground level, night clubs, a bowling alley, the Grammy Museum a broadcast facility for ESPN, a cable sports network, and various office uses. The Central Plaza, which is located between Building 'B' and the Nokia Theatre provides a centrally located gathering place wherein large-scale public events are hosted.

Following the approval of a hotel financing agreement by the City Council in 2005, and the subsequent amendment of the LASED Specific Plan, construction began on the Convention hotel in 2007. The hotel includes both standard and luxury hotel rooms and residences. The hotel is scheduled to open in February 2010.

#### *Figueroa Subareas*

Outside the Olympic West and Olympic East Subareas, the Director of Planning has issued approvals for mixed use developments on both the Figueroa Central Subarea and the Figueroa South Subarea. Following the most recent amendment of the LASED Specific Plan (effective in January of 2009), a mixed-use project consisting of 860 residential units; 222 hotel rooms; a health club; and restaurant, entertainment and retail uses was approved for the Figueroa Central Subarea. In October 2006 a mixed use project containing 648 units and 23,000 square feet of retail and restaurant uses was approved for the Figueroa South Subarea. No construction activity has taken place at either of the Figueroa Subareas.

#### *Relevant Cases and Actions*

DIR-2005-1341-SPP-SPPA, August 15, 2005

- Nokia Theatre;
- 210,000 square feet;
- 7,100 seats;
- Live theater currently in operation.

DIR-2005-5518-SPP-SPPA, November 1, 2005

- Figueroa South Mixed-use Towers;
- 870,000 square feet;
- Two towers 350 feet in height;
- 648 residential units;
- 48,000 square feet of retail/entertainment/restaurant uses;
- 858 parking spaces;
- Entitlement modified by APCC-2006-3868-SPE-SPP.

DIR-2005-7920-SPP, November 30, 2005

- Olympic East Parking Structure;

- 816 parking spaces;
- Subterranean parking structure currently in operation.

DIR-2005-7453-SPP-SPPA, December 14, 2005

- Figueroa Central Mixed-use Towers;
- 1,120,000 square feet;
- Two towers, 350 feet in height and 494 feet in height;
- 700 residential dwelling units;
- 250,000 square feet of retail/entertainment/restaurant uses;
- 1,125 parking spaces;
- Entitlement modified by DIR-2005-7453-SPP-SPPA-M1 and again by DIR-2005-7453-SPP-SPPA-M2.

DIR-2006-4043-SPP, October 5, 2006

- Olympic West Parking Structure;
- 2,699 parking spaces;
- Loading dock access to various LA Live Buildings;
- Subterranean and above-grade structure currently in operation.

APCC-2006-8393-SPE-SPP, October 24, 2006

- LA Live Building B;
- 112,000 square feet;
- 110 feet in height;
- Restaurant, office, broadcast, uses;
- Includes 30,300-square-foot Central Plaza;
- Building and plaza currently in operation.

APCC-2006-3868-SPE-SPP, November 13, 2006

- Figueroa South Mixed-use Towers;
- Action modified previous November 1, 2005 Director's determination, DIR-2005-5518-SPPA-M1;
- 870,000 square feet;
- Two towers, 260 feet and 400 feet in height;
- 648 residential units;
- 833 parking spaces;
- No building permits issued, no construction activity.

DIR-2005-7453-SPP-SPPA-M1, January 29, 2007

- Figueroa Central Mixed-use Towers;
- Action modified previous December 14, 2005 Director's determination, DIR-2005-7453-SPP-SPPA;
- 1,120,000 square feet;
- Two towers, 350 feet in height and 494 feet in height;
- 860 residential dwelling units;
- 189,400 square feet of retail/entertainment/restaurant uses;
- 1,930 parking spaces;
- Entitlement modified by DIR-2005-7453-SPP-SPPA-M2.

DIR-2006-10272-SPP, February 20, 2007

- LA Live Building A;
- 408,200 square feet;
- 106 feet in height;
- Restaurant, office, broadcast, nightclub and museum uses;
- Building currently in operation;

DIR-2007-2148-SPP-SPPA, June 28, 2007

- LA Live Convention Hotel;
- 1,478,335 square feet;
- 1,001 hotel rooms;
- 224 residential dwelling units;
- 660 feet in height;
- Conference center, restaurants, pool decks and outdoor amenities;
- Hotel under construction, scheduled to open February 2010;
- Entitlement corresponds with Specific Plan Amendment CPC-2006-7109-DA-SP-ZC, effective January 27, 2007.

DIR-2005-7453-SPP-SPPA-M2, September 28, 2007

- Figueroa Central Mixed-use Towers;
- Action modified previous January 29, 2007 Director's determination, DIR-2005-7453-SPP-SPPA-M1;
- 1,488,101 square feet;
- Two towers, 455 feet in height and 575 feet in height;
- 860 residential dwelling units;
- 222 hotel rooms;
- 271,286 square feet of retail/entertainment/restaurant uses;
- 1,930 parking spaces;
- Entitlement corresponds with Specific Plan Amendment CPC-2007-1238-SP-DA, effective November 30, 2007;
- No building permits issued, no construction activity.

DIR-2007-5865-SPP-SPPA, February 7, 2008

- Regal Cinema;
- 127,327 square feet;
- 3780 seats, 14 screens;
- 105 feet in height;
- Cinema currently in operation.

Various other letters of determination have been issued with respect to Project Permits for signs on the various structures and with respect to Plan Approvals for alcohol sales and service.

### Issues

The following is a brief overview of additional issues central to the proposed amendments, and central to the ongoing implementation of the Los Angeles Sports and Entertainment District (LASED) Specific Plan.

#### *Vehicular Trips related to the Increase in Floor Area*

The proposed Specific Plan Amendment would increase the overall floor area allowed within the Plan Area from 5,515,101 to 5,827,313—an increase of 312,212 square feet. Furthermore, the amount of floor area allowed on Development Site 12 (Olympic North) would increase from 500,000 square feet to 897,550—an increase of 397,550 square feet. 312,212 square feet of the new floor area at Development Site 12 would be floor area that is new to the Specific Plan. 85,338 square feet of the floor area that is new to Development Site 12 would be unused floor area that has been transferred from Development Sites 1 and 2 on the Olympic East and Olympic West subareas: sites currently developed with LA Live buildings and the Convention Hotel. The Specific Plan and EIR contain an Equivalency Matrix which allows for the transfer and exchange of permitted land uses throughout the Specific Plan as governed by the matrix. Consequently, the increase of 85,338 square feet at Olympic North does not bring new vehicular trips to the Plan Area. However, the increase of 312,212 square feet does bring new vehicular trips to the Plan Area.

The Addendum to the Environmental Impact Report for the project found that the original EIR analyzed 3,612 P.M. peak hour trips associated with floor area allowed within the Plan Area. The actual floor area that has been constructed and the particular mix of uses that have been incorporated into existing structures within the Plan Area have resulted in 3,058 P.M. peak hour trips. The proposed Specific Plan Amendment would increase P.M. peak hour trips to 3,541—an increase of 16-percent. However, 3,541 P.M. peak hour trips is still 2-percent less than the 3,612 P.M. peak hour trips that were analyzed by the original EIR. While the proposed increase in floor area does represent an increase in vehicular trips this increase does not create a new significant impact to traffic and circulation in the project vicinity.

#### *Increase in Building Height*

The proposed Specific Plan Amendment would increase the allowed height of building within the Olympic North Subarea from 200 feet to 350 feet. A range of building heights are allowed on the various subareas within the Specific Plan. The Figueroa South and Figueroa Central subareas are allowed 400 feet and 575 feet in height respectively. The Olympic West and Olympic East subareas are allowed 150 feet and 660 feet in height respectively. The increase in height for Olympic North to 350 feet is therefore well within the range of building heights conceived within the Plan Area.

Furthermore, in addition to regulating building height, the Specific Plan includes urban design regulations related to podium height, tower height, tower setbacks and lot coverage. These unique development constraints were taken primarily from the project's Final EIR. The Plan Area and Olympic North subarea is surrounded by other property within the Central City with no height limits. Shade/shadow impacts analyzed in the EIR governed the original height limits of the Specific Plan. An Addendum to the original EIR has determined that there is no additional significant increase in previously identified impacts relating to shade/shadow related to increasing the allowed height at Olympic North to 350 feet.

As with all projects in the LASED Plan Area, any proposed structures would be reviewed by the Director of Planning for compliance with the various provisions and design criteria stipulated in the Plan. Prior to the issuance of any permits for construction, the Director of Planning is required to issue a Project Permit Compliance Review which provides findings that demonstrate compliance. The Director's determination may be appealed to the Central Area Planning Commission.

### *New and Transferred Land Uses*

The goal of the Specific Plan Amendment is to allow for wider range of land uses to be allowed on the Olympic North subarea. Currently the subarea is devoted exclusively to the development of 400 hotel rooms and 100 residential dwelling units. The proposed Amendment to the Specific Plan would allow for broadcast, production and office uses within the subarea. The increase in land uses at the site, while keeping the project within the range of vehicular trips that would be acceptable pursuant to the project's EIR and Addendum is accomplished through a variety of means.

First, the allowed floor area at the Olympic North subarea would be increased by 312,212 square feet as discussed above. Second, the number of hotel rooms and residential dwelling units allowed in the subarea would be decreased from 400 rooms to 275 rooms and 100 dwelling units to 65 dwelling units respectively. Lastly, 89,696 square feet of hotel floor area and 895 square feet of residential floor area would be transferred from Development Sites 1 and 2 (where the floor area has gone unused) to Development Site 12 (Olympic North). The Equivalency Matrix makes possible the transfer and exchange of one land use for another within the Specific Plan subject to the requirements of the matrix. The Equivalency Matrix is intended to allow development within the area to respond to as-built conditions and market conditions.

### *No Changes to Sign Regulations or Alcohol Regulations*

While the proposed Specific Plan Amendment does not propose any changes to sign regulations or alcohol sales and service regulations within the Plan Area these two issues have attracted the ongoing attention of various stakeholders and constituents.

In January 2007 the LASED Specific Plan was amended to include the Olympic North subarea. At that time the Olympic North subarea was folded into Sign District B as defined in Section 16 of the Specific Plan. Sign District B generally applies to those portions of the Plan Area that are not immediately adjacent to the primary activity centers such as the Central Plaza and the Staples Center and as are regulated by more conservative sign regulations. The project does not propose any changes to the Sign District to which Olympic North is assigned, nor does it involve any changes to the sign provisions within Section 16 of the Specific Plan. As shown on Map 8 of the draft Amended Specific Plan, the four parcels that are to be absorbed into the Olympic North subarea would not be included in Sign District B, and would not be subject to any of the sign rights and provisions provided by the Specific Plan.

The Specific Plan—a sports and entertainment district—currently allows 33 separate alcohol uses within the Plan Area. The Specific Plan enables a host of provisions related to the appropriation of these 33 alcohol uses within the Plan Area, stipulating that only three uses may be for offsite sales; that nine ABC licenses must be repurchased from a specified geographic range before uses may be distributed within the Plan Area; that only four onsite uses may include "bottle service," and that nine of the uses must be subject to a public hearing. The provisions surrounding alcohol use within the Specific Plan (Sections 12 and 13) have been crafted in cooperation with an Alcohol Advisory Committee with participation from local stakeholder groups, the Los Angeles Police Department, Council Districts 1 and 9, and the California Department of Alcoholic Beverage Control.

To date, 15 alcohol uses have been granted within the LA Live development area (a request for alcohol use for the Convention Hotel is currently pending with the Zoning Administrator). Three public hearings have been held; three ABC licenses have been repurchased and one "bottle

service" use has been authorized. Furthermore, no issues of significance have been reported to the Department of City Planning related to the granting of the 15 current alcohol uses within the Plan Area. The proposed Specific Plan amendment does not propose any changes to the alcohol use provisions within the Specific Plan.

#### *Traffic Mitigation Phasing Plan*

The Specific Plan includes a range of traffic mitigations and other public improvements as outlined in Appendix C of the Specific Plan. These required mitigations were identified at the time of adoption of the Specific Plan in 2001. Planning Staff has received a comment letter from LADOT on the revised projects and proposed amendment, which determined that no new significant impacts result from the revised mix of land uses and additional floor area.

A Transportation Mitigation Phasing Plan (TMPP), as required by Section 14.B.1 of the Specific Plan, was approved by LADOT on August 14, 2002. This TMPP spells out the specific mitigations that are assigned to each Development Parcel within the Specific Plan. As projects are reviewed by Planning Staff in consultation with LADOT, applicable traffic mitigations or applicable portions of larger-scale traffic mitigations are assigned to each project. The required mitigations are required to be completed, or funded in the case of larger scale improvements, prior to the issuance of a Certificate of Occupancy.

In addition to traffic mitigations, the Specific Plan and EIR outlines Traffic Demand Management practices which are applied to each project as reviewed and which become part of the conditions of approval. These conditions include the provision of new bus shelters, transit kiosks, rideshare and transit incentives, bicycle facilities, and other transportation demand management requirements which are incorporated into project leases.

#### Conclusion

The proposed Specific Plan Amendment, Zone Change, and Amendment to the Third Amended and Restated Development Agreement are consistent with the goals and vision of the Los Angeles Sports and Entertainment District Specific Plan. These actions seek to facilitate the well planned completion and integration of a master-planned entertainment district into its urban surroundings. Central to these changes is the ability to facilitate the development of broadcast, production and office uses on the Olympic North subarea, thereby providing a broader mix of 24-hour uses within the Plan Area.

The proposed Amendment has been developed within the framework of the approved EIR and traffic mitigation plan, and through the exchange of project land uses does not exceed the trip caps analyzed as part of the original project. The Specific Plan's Equivalency Matrix, an integral part of the original plan, will continue to ensure that development stays within this approved environmental envelope.

The amended Development Agreement retains all of the previously approved public benefits, including affordable housing, job training, local hiring, and park funding. The Specific Plan is the result of neighborhood participation and voice, with an underlying understanding that the success of Downtown is critical to the success of Los Angeles. Planning Staff recommends approval of the requested amendments.

## 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 LASED. 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 LASED; 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.

## PUBLIC HEARING AND COMMUNICATION

### Public Hearing

- A public hearing on this matter was held City Hall, 200 N. Spring Street, 10<sup>th</sup> Floor Hearing Room on September 30, 2009 at 9:00 A.M.
- Present: Approximately 15 people attended.
- Speakers: 6 in support; None in opposition
- A representative of Councilmember Jan Perry, Council District 9, was present and spoke in support of the project.
- A representative of the Central City Association, and the South Park Stakeholders Group was present and spoke in support of the project.

### Communications Received

- All written communications regarding the project are attached to this report as Exhibit H.
- 2 letters were received in support of the project: one from the Central City Association and one from the South Park Stakeholders Group.
- A letter from the Salvation Army, a neighboring property owner, was received expressing concerns about the project.
- Written correspondence from the Department of Transportation, relative to the projects traffic analysis is attached as an exhibit to this report.
- A letter from Latham & Watkins, the applicant's legal representative was submitted in response to issues raised in the Salvation Army letter.

### Summary of Public Hearing Testimony and Communications Received

#### **Councilmember Jan Perry, Council District 9:**

- The Councilmember is a longtime advocate of the Los Angeles Sports and Entertainment District (LASED), and fully supports the requested amendments.
- The provision of jobs and a stronger 24-hour presence in the district is consistent with the Central City Community Plan.
- Analysis suggest that the project can be executed without creating additional traffic impacts beyond the scope of the EIR.

#### **Ted Tanner, Applicant**

- The Specific Plan has been amended twice in response to market conditions which speaks to how well functioning the Specific Plan is.
- The existing LA Live campus is already functioning and lively and the expansion northward makes sense and would allow for continued economic growth.
- The cinema would be opening next month. The Conference Center will open shortly thereafter. (both facilities are now open). The Convention Hotel will open in February.
- There is a lack of weekday/daytime activities in the area, the expansion of uses on Olympic North to include broadcast, production and office uses would more fully accomplish the goals of the Specific Plan.

- Olympic North could accommodate both the required hotel as well as office and production uses. Hotel and residential would be diminished.
- Bringing broadcast, production and office uses to Olympic North makes downtown more competitive as a regional job center.

**David Goldberg, Latham & Watkins, Applicant Representative**

- The amendment transfers floor area from other locations so that the net increase is only in the realm of approximately 300,000 square feet.
- No other changes such as alcohol or signage are proposed as part of the project.
- The project is fundamentally consistent with the goals of the City's General Plan.
- No new mitigation measures are proposed as part of the project, it still complies with the existing EIR.

**Mike Phiffer, South Park Stakeholders Group**

- In strong support of the proposed amendments, would like to see a stronger 24-hour presence in the district.
- The project will also bring a wide range of good jobs to the area.

**Ann Nguyen, Central City Association**

- Strongly support the amendment.
- The Specific Plan has already had a much needed positive affect on the area, approval would only build upon the success of the project.
- New buildings and new job-uses are critical to increase Downtown Los Angeles' visibility to the entertainment industry.

**William Raleigh, Local 33**

- Labor Union currently has relationship with LA Live.
- In support of the project and moving forward with expanded job opportunities.

**Michael Woodruff, Salvation Army**

- Salvation Army owns two acres of land adjacent to the Olympic North expansion area.
- Salvation Army operates sensitive uses in the area including a church and women's shelter. The expansion of a 24-hour downtown environment could have an impact on these sensitive uses.
- The cumulative impact of 10 project permit compliance Review approvals and exceptions to LASED, as well as two SPA's need to be considered. A shifting of densities to the areas close to the Salvation Army could negatively impact Salvation Army properties.
- Additional conditions, beyond those that already exist in the EIR and the Specific Plan need to be added to regulate tower bulk, height and tower placement.





**City Planning Department**  
City Hall • 200 N. Spring Street • Los Angeles, CA 90012



---

*ENVIRONMENTAL IMPACT REPORT ADDENDUM*  
*CENTRAL CITY COMMUNITY PLAN AREA*

---

***Los Angeles Sports and Entertainment District***  
***Final EIR (SCH #2000091046)***

***Council District No. 9***

**Project Description:** This document serves as an Addendum to the Los Angeles Sports and Entertainment District (LASED) Final EIR (SCH #2000091046) certified by the City of Los Angeles on September 4, 2001 (the "Final EIR"), and two subsequent Final EIR Addendums, dated August 31, 2006, and June 28, 2007. This Addendum analyzes the potential impacts of an amendment to the Los Angeles Sports and Entertainment District Specific Plan (the "Specific Plan") and previously approved entitlements (the "Approved Project") to allow for the expansion of weekday uses in the LASED. Specifically, the proposed Specific Plan amendment (the "Revised Project") is summarized as consisting of: (1) increasing the maximum allowable development within the LASED from 5,977,806 square feet to 6,290,018 square feet; (2) increasing the maximum 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; (5) increasing the maximum allowable tower height in the Olympic North Subarea from 200 feet to 350 feet above existing 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; (9) zoning the expanded portion of the Olympic North Subarea in accordance with the LASED Specific Plan; and (10) modifying a limited number of LASED Specific Plan development standards.

**PREPARED BY:**  
Matrix Environmental

---

***August 18, 2009***

**ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT  
FOR THE  
LOS ANGELES SPORTS AND ENTERTAINMENT DISTRICT**

**OLYMPIC NORTH PROJECT**

**PREPARED FOR:**

The City of Los Angeles Department of City Planning  
Community Planning Bureau  
201 North Figueroa Street, 4<sup>th</sup> Floor  
Los Angeles, CA 90012-2601

**APPLICANT:**

L.A. Arena Land Company, LLC  
800 Olympic Boulevard, Suite 305  
Los Angeles, CA 90015

**PREPARED BY:**

Matrix Environmental  
6701 Center Drive , Suite 900,  
Los Angeles, CA 90045

August 18, 2009

# Table of Contents

---

	<u>Page</u>
<b>I. SUMMARY .....</b>	<b>1</b>
A. Introduction.....	1
B. CEQA Authority for the Addendum.....	4
C. Format of the Addendum Analysis .....	5
D. Summary Description of the Revised Project .....	5
E. Mitigation Monitoring .....	6
F. Summary of Environmental Effects, Mitigation Measures, and Level of Significance After Mitigation.....	6
<b>II. PROJECT DESCRIPTION .....</b>	<b>7</b>
A. Overview of the Los Angeles Sports and Entertainment District.....	7
B. Overview of the LASED EIR.....	11
C. Vesting Tentative Tract Maps .....	17
D. Description of the Approved Project .....	18
E. Description of the Revised Project .....	18
F. Necessary Actions.....	26
<b>III. ENVIRONMENTAL IMPACT ANALYSIS.....</b>	<b>27</b>
A. Land Use.....	27
B. Aesthetics.....	36
1. Visual Quality .....	36
2. Light and Glare.....	41
3. Shade and Shadow .....	43
C. Population, Housing, and Employment .....	49
D. Drainage and Surface Water Quality .....	55
E. Air Quality.....	58
F. Transportation/Circulation .....	69
1. Traffic.....	69
2. Parking.....	75
G. Hazardous Materials.....	83
H. Noise.....	85
I. Public Services.....	88
1. Fire Protection .....	88
2. Police.....	90
3. Schools.....	91
4. Parks and Recreation .....	95

	<u>Page</u>
J. Utilities.....	97
1. Water.....	97
2. Sewer .....	100
3. Solid Waste .....	102
K. Geology/Seismic Hazards .....	105
L. Architectural/Historic Resources .....	108
<b>IV. OTHER ENVIRONMENTAL CONSIDERATIONS .....</b>	<b>110</b>
A. Growth Inducing Impacts of the Revised Project.....	110
B. Significant Irreversible Environmental Changes.....	111
<b>V. LIST OF PREPARERS .....</b>	<b>112</b>

## **List of Tables**

---

1	Approved Project - Entitled LASED Development Program.....	19
2	Proposed Project - Proposed LASED Development Program .....	21
3	Floor Area Ratios (FAR) .....	28
4	Estimated Population Generation under Approved Project and Revised Project.....	51
5	Estimated Employment Generation under Approved Project and Revised Project.....	53
6	Consistency with Applicable California Climate Action Team Report Strategies (Approved Project).....	63
7	Trip Generation: Approved Project and Revised Project .....	72
8	Comparison of Proposed On-Site Parking Spaces .....	77
9	Parking Code Requirement.....	79
10	Comparison of Code Required Parking Spaces .....	80
11	Comparison of Parking Supply and Demand .....	80
12	Projected Student Generation.....	92
13	Estimated Water Demand for Approved and Revised Project .....	98
14	Estimated Wastewater Generation for Approved and Revised Project.....	101
15	Estimated Solid Waste Generation for Approved and Revised Project.....	103

## **List of Figures**

---

1	Regional Location Map .....	8
2	LASED Specific Plan Boundaries .....	9
3	Specific Plan Development Sites .....	10
4	Allowable Building Height & Massing: Olympic North Subarea .....	23
5	Proposed Allowable Building Height & Massing: Olympic North Subarea .....	24
6	Comparison of Shadows During Summer Solstice .....	45
7	Comparison of Shadows During Winter Solstice .....	46

# **I. Summary**

---

## **A. Introduction**

This document is an Addendum to the Los Angeles Sports and Entertainment District (LASED) Final EIR (SCH #2000091046) certified by the City of Los Angeles on September 4, 2001 (the "Final EIR"), and two subsequent Addendums, dated August 31, 2006 and June 28, 2007. At this time, the Applicant is proposing to amend the LASED Specific Plan to allow for the implementation of the Project in a manner that supports the Central City Community Plan's goal to support uses which "create an active 24-hour downtown environment for residents and which would foster increased tourism" by expanding the weekday uses in the LASED, which is currently developed with uses that are generally oriented towards nighttime and weekend activity.

The LASED is currently comprised of approximately 27 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. The LASED also lies within the South Park area of the Central Business District Redevelopment Project area and within the City Center Redevelopment Project area. Generally, the development sites that make up the LASED are located east and west of Figueroa Street, with Olympic Boulevard on the north and almost to Pico Boulevard on the south. Additionally, one development site, the Olympic North Subarea, is located north of Olympic Boulevard between Georgia Street and Francisco Street. The LASED consists of the following two components: (1) the LASED Specific Plan area (which currently covers five of the LASED's six City blocks); and (2) development on one City block not included within the LASED Specific Plan area, but included in the Final EIR.

The purpose of this EIR Addendum is to analyze the impacts of an amendment to the LASED Specific Plan to permit an increase in development within the Olympic North Subarea, as well as to reduce the amount of development permitted within the Olympic East and Olympic West Subareas to offset a portion of the increased development within the Olympic North Subarea. No changes are proposed with regard to development within the two remaining (i.e., Figueroa Central and Figueroa South) subareas. Specifically, the proposed Specific Plan amendment (the "Revised Project") is summarized as consisting of

the following actions: (1) increasing the maximum allowable development within the LASED from 5,977,806 square feet to 6,290,018 square feet; (2) increasing the maximum 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; (5) increasing the maximum allowable tower height in the Olympic North Subarea from 200 feet to 350 feet above existing grade (exclusive of rooftop elements); (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; (9) zoning the expanded portion of the Olympic North Subarea in accordance with the LASED Specific Plan; and (10) modifying a limited number of LASED Specific Plan development standards.

The LASED Final EIR analyzed a four million square foot conceptual development program for the LASED. Following certification of the Final EIR, the City approved a vesting tentative tract map in March 15, 2005 for the western portion of the Figueroa North Subarea with companion discretionary approvals approved on June 21, 2005. These approvals changed the entitlement rights within the western portion of the Figueroa North Subarea from the development of 25,750 square feet of office uses and 7,499 square feet of retail uses to 172,026 square feet of residential uses (156 new dwelling units) and 7,499 square feet of retail uses. The end result of this approval was an increase in total permitted development within the LASED from four million square feet to 4.146 million square feet. On August 15, 2005, a Project Permit Compliance Review ("PPCR") application, pursuant to Section 5.A of the LASED Specific Plan (Ordinance No. 174,224, effective October 21, 2001), was approved by the City of Los Angeles Planning Department (the "Planning Department") for the transfer of the live theater (the Nokia Theatre) proposed for LASED Specific Plan Development Site No. 3 to Development Site Nos. 4 and 5, while also increasing the number of seats within the live theater from 7,000 to 7,100; and transferring the development allocated to Development Site Nos. 4 and 5 to Development Site No. 3. The three Development Sites included in the PPCR approval are all located within the LASED Specific Plan's Olympic East Subarea. Additionally, on November 1, 2005, a second PPCR was approved for transfers of residential, retail, and hotel floor area between Figueroa Central Subarea and the Figueroa South Subarea. The transfers resulted in a shift in the location of certain entitled land uses for Development Sites 7, 8, 10, and 11.

On December 15, 2005, a third PPCR that modified permitted development within the LASED Specific Plan was approved by the City. This PPCR modified development through a series of land use transfers, assignments, and conversions between and within the development sites of the Specific Plan area. With this third PPCR, the number of

residential units increased to 1,348 units and the amount of retail/entertainment/restaurant uses decreased. In addition, this PPCR decreased the number of hotel rooms in the LASED Specific Plan area to 1,400 hotel rooms and increased the rooflines of the Figueroa Central Subarea buildings to a height of 462 feet, with a maximum building height of approximately 494 feet, inclusive of all rooftop elements. On October 24, 2006, a fourth PPCR modified the Specific Plan development by shifting square footage on the Olympic East Subarea, transferring 75,000 square feet of office uses from Development Site 3 to Development Site 6 and transferring 73,000 square feet of retail/entertainment/restaurant uses from Development Site 6 to Development Site 3. Lastly, the City and the Community Redevelopment Agency of the City of Los Angeles, in September 2005, approved a financing agreement and related ordinance for the development of the Convention Center Hotel proposed for the Olympic East Properties that would, among other changes, result in an increase in the maximum height of the hotel tower from 600 to 660 feet.

On January 27, 2007, the Planning Department amended the LASED Specific Plan to include the Olympic North Subarea into the Specific Plan area following the preparation of the 2006 Final EIR Addendum concluding the addition of this Subarea would not increase the environmental impacts identified in the Final EIR. The January 2007 Amendment increased the overall development in the LASED Specific Plan area to 5,147,429 square feet through an increase in the amount of retail/entertainment/restaurant, hotel (square footages and rooms), office, and residential uses, as well as through the development of a cinema and ballroom space to support the Convention Center Hotel. The January 2007 Amendment also increased the maximum tower height on the Olympic East Subarea to 660 feet and enacted modifications to allow a redistribution of where signage could occur, as well as the types of signs permitted, throughout the LASED Specific Plan area. Additionally, the City amended the LASED Specific Plan a second time on November 30, 2007, to permit the LA Central Project, which was evaluated in a 2007 Final EIR Addendum that concluded that the LA Central Project would not increase the environmental impacts identified in the Final EIR. This second Specific Plan amendment increased the total permitted development within the LASED Specific Plan area to 5,515,101 square feet through a 35,186-square-foot increase in commercial floor area, a 125,539-square-foot increase in residential floor area, and the inclusion of 206,592 square feet of hotel use. Subsequent to the 2007 Specific Plan Amendment, on February 7, 2008, a fifth PPCR included a land use equivalency transfer to convert 1,474 square feet of unused hotel and ballroom uses from the Olympic West Subarea to 7,327 square feet of cinema uses on the same Subarea. Accordingly, all references within this Addendum to the currently entitled Project (the "Approved Project") reflect conditions inclusive of the aforementioned Specific Plan amendments and PPCR approvals.

The purpose of this Addendum is to analyze the proposed changes in the development program for the LASED to determine whether any significant environmental impacts, which were not identified in the Final EIR, would result or whether previously



identified significant impacts would be substantially more severe. The changes to the Approved Project described herein (i.e., the proposed Specific Plan amendment) are referred to in this Addendum as the "Revised Project".

Implementation of the Revised Project would result in a land use mix that exceeds some of the development guidelines set forth in Appendix D of the LASED Specific Plan. In such cases, the LASED Specific Plan requires that additional environmental review be conducted. This Addendum serves as the environmental review required pursuant to this provision of the Specific Plan. All prior documents that are germane to this Addendum including the Final EIR (i.e., comprised of the Draft EIR, including the Initial Study; Response to Comments received on the Draft EIR, including refinements and clarifications to the Draft EIR text; and a Mitigation Monitoring and Reporting Program); two Addendums; and all prior PPCR and tract map approvals are hereby incorporated by reference.<sup>2</sup>

## B. CEQA Authority for the Addendum

The California Environmental Quality Act (CEQA) and CEQA Guidelines establish the type of environmental documentation, which is required when changes to a project occur after an EIR is certified. Section 15164 (a) states that:

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

The analysis in this Addendum evaluates the proposed changes due to the Revised Project in order to determine whether any significant environmental impacts, which were not identified in the Final EIR or subsequent Addendums, would result or whether previously identified significant impacts would be substantially more severe. As demonstrated by the analysis herein, the Revised Project would not result in any additional significant impacts nor would it increase the severity of previously anticipated significant impacts. Therefore, it is appropriate under CEQA to prepare an addendum for the Revised Project.

---

<sup>2</sup> The LASED Final EIR, April 2001, and all other referenced documents are available for review at the City of Los Angeles Department of City Planning, 200 North Spring Street, Los Angeles, California 90012.

## **C. Format of the Addendum Analysis**

The environmental analysis in this Addendum follows the same outline and uses the same thresholds of significance as those used in the Final EIR. The analyses presented in this Addendum address each of the environmental issues analyzed in the Final EIR, as well as the two prior Addendums, focusing on the potential changes in environmental impacts due to the Revised Project. The analysis of each environmental issue first summarizes the findings of the Final EIR and subsequent Addendums, and then analyzes the potential physical effects of the Revised Project. In addition, each analysis identifies any changes to the mitigation measures included in the Final EIR and subsequent Addendums as well as the conclusions regarding the significance of impacts after the imposition of the mitigation measures. The analyses presented in this Addendum are consistent with the applicable provisions of the LASED Specific Plan, in that changes within the LASED Specific Plan area are to be evaluated in terms of the conditions and analyses set forth in the Final EIR and subsequent Addendums.

## **D. Summary Description of the Revised Project**

The aspects of the Revised Project that would be authorized under the Project Approvals, which have the potential to affect the physical environment are as follows: (1) increasing the maximum allowable development within the LASED from 5,977,806 square feet to 6,290,018 square feet; (2) increasing the maximum 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, thereby increasing the LASED area from 27.1 acres to 27.8 acres and 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 existing grade (exclusive of rooftop elements); (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; (9) zoning the expanded portion of the Olympic North Subarea in accordance with the LASED Specific Plan; and (10) making modifications to a limited number of LASED Specific Plan development standards.

## **E. Mitigation Monitoring**

As required by CEQA, the Los Angeles City Council adopted a Mitigation Monitoring and Reporting Program (MMRP) for the LASED to ensure compliance with the adopted mitigation measures. This Addendum incorporates by reference the LASED's MMRP. No new mitigation measures are identified in this Addendum that would modify the MMRP adopted in concert with the certification of the Final EIR. Thus, the MMRP, as previously adopted, also applies to the Revised Project.

## **F. Summary of Environmental Effects, Mitigation Measures, and Level of Significance After Mitigation**

This Addendum analyzes the Revised Project and describes the modifications to the Final EIR and subsequent Addendums, which are necessary to reflect the Revised Project. For all environmental issues, the Addendum demonstrates that the Revised Project would not result in new significant impacts or substantial increases in the severity of previously identified significant impacts and that no supplemental or subsequent environmental review is required.

## **II. Project Description**

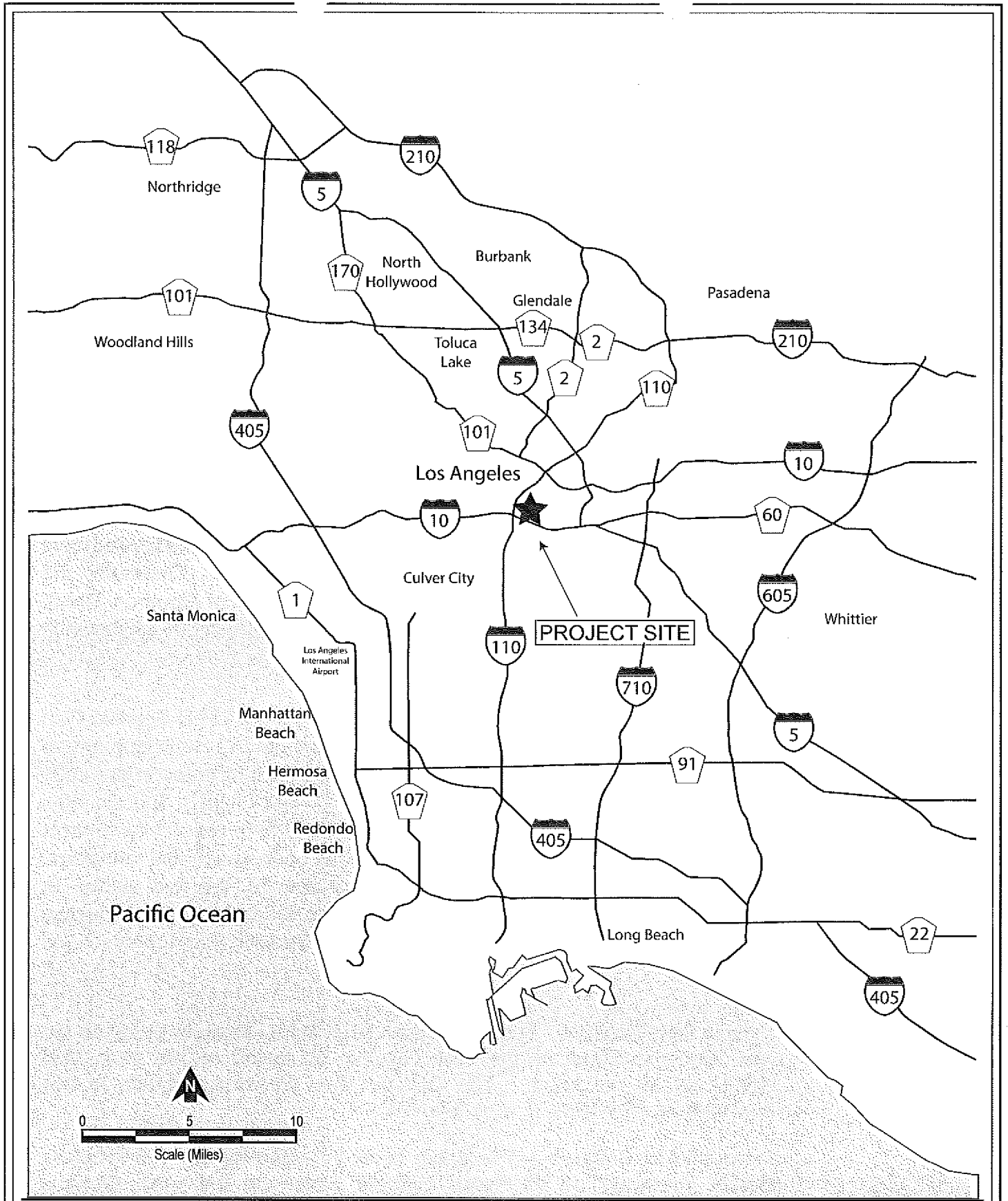
---

### **A. Overview of the Los Angeles Sports and Entertainment District**

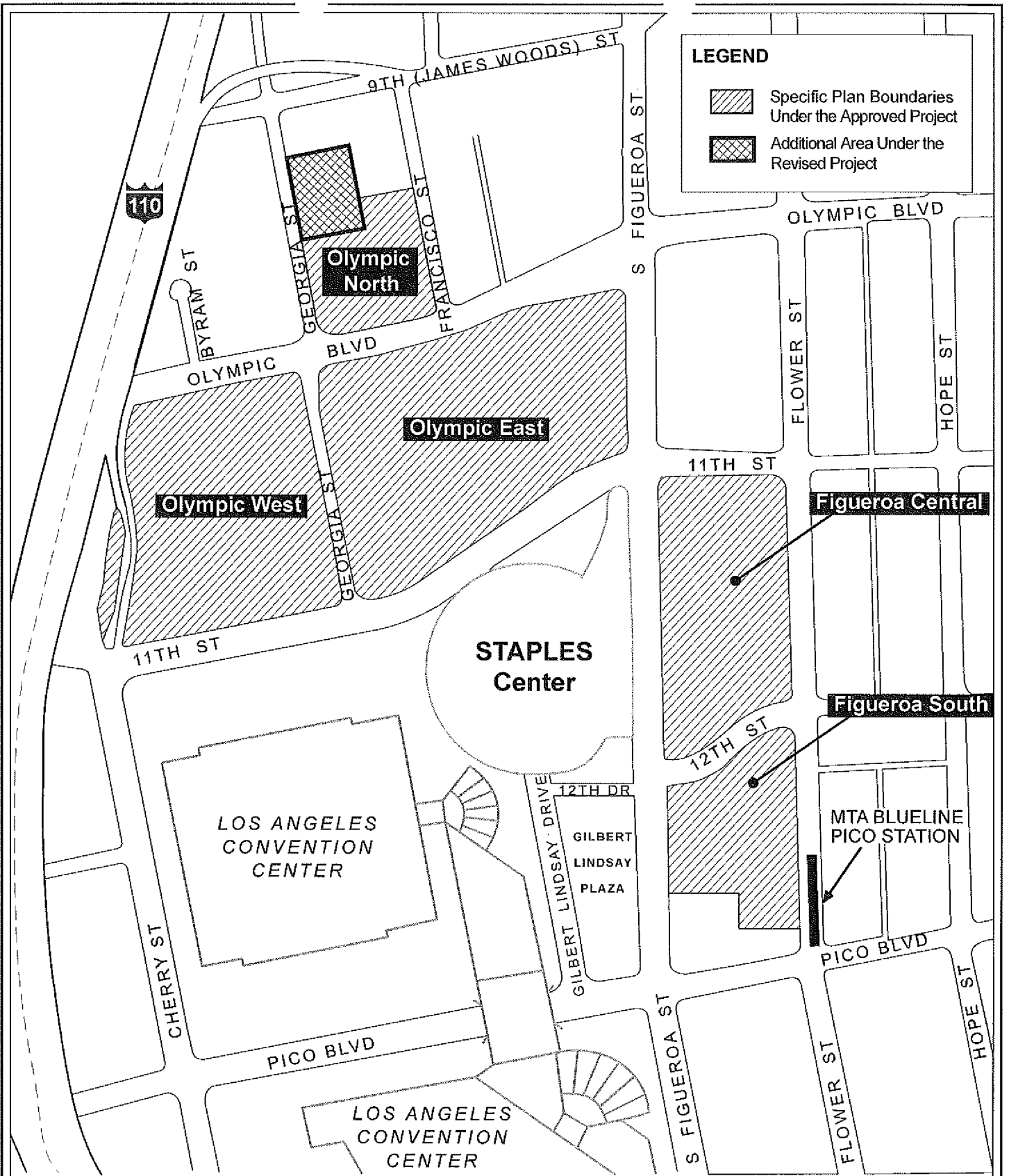
The Los Angeles Sports and Entertainment District (the "LASED") comprises portions of six city blocks in the southwest section of downtown Los Angeles, approximately 1.5 miles southwest of Los Angeles City Hall, and 0.5 miles northeast of the Santa Monica Freeway (the "I-10") and Harbor Freeway (the "I-110") interchange. The LASED also lies within the South Park area of the Central Business District Redevelopment Project area and within the City Center Redevelopment Project Area. Generally, the development areas that make up the LASED are located east and west of Figueroa Street, to Olympic Boulevard on the north and almost to Pico Boulevard on the south as shown in Figure 1 on page 8.

The LASED consists of the following two components: (1) the LASED Specific Plan area (which currently covers five of the LASED's six City blocks); and (2) development on one City block not included within the LASED Specific Plan area, but included in the 2001 LASED Final Environmental Impact Report (the "Final EIR"). The LASED Specific Plan (last amended November 30, 2007, Ordinance No. 179,413) sets forth regulatory controls regarding densities, heights, uses, parking, signage, as well as open space and landscape requirements. As shown in Figures 2 and 3 on pages 9 and 10, the five blocks, or subareas, within the LASED Specific Plan area are further divided into 12 individual development sites. The five subareas regulated by the LASED Specific Plan are described as follows:



- Olympic East Subarea – The entire block bounded by Georgia Street on the west, Figueroa Street on the east, Olympic Boulevard on the north, and 11th Street on the south. The Olympic East Subarea consists of five development sites (Nos. 2, 3, 4, 5, and 6).
- Olympic West Subarea – The entire block bounded by the 110 Freeway (Harbor Freeway) on the west, Georgia Street on the east, Olympic Boulevard on the north, and 11th Street on the south. The Olympic West Subarea consists of three development sites (Nos. 1, 1a, and 1b).

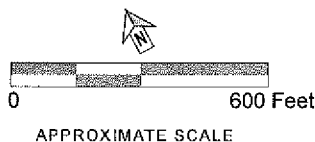


**Figure 1**  
Regional Location Map

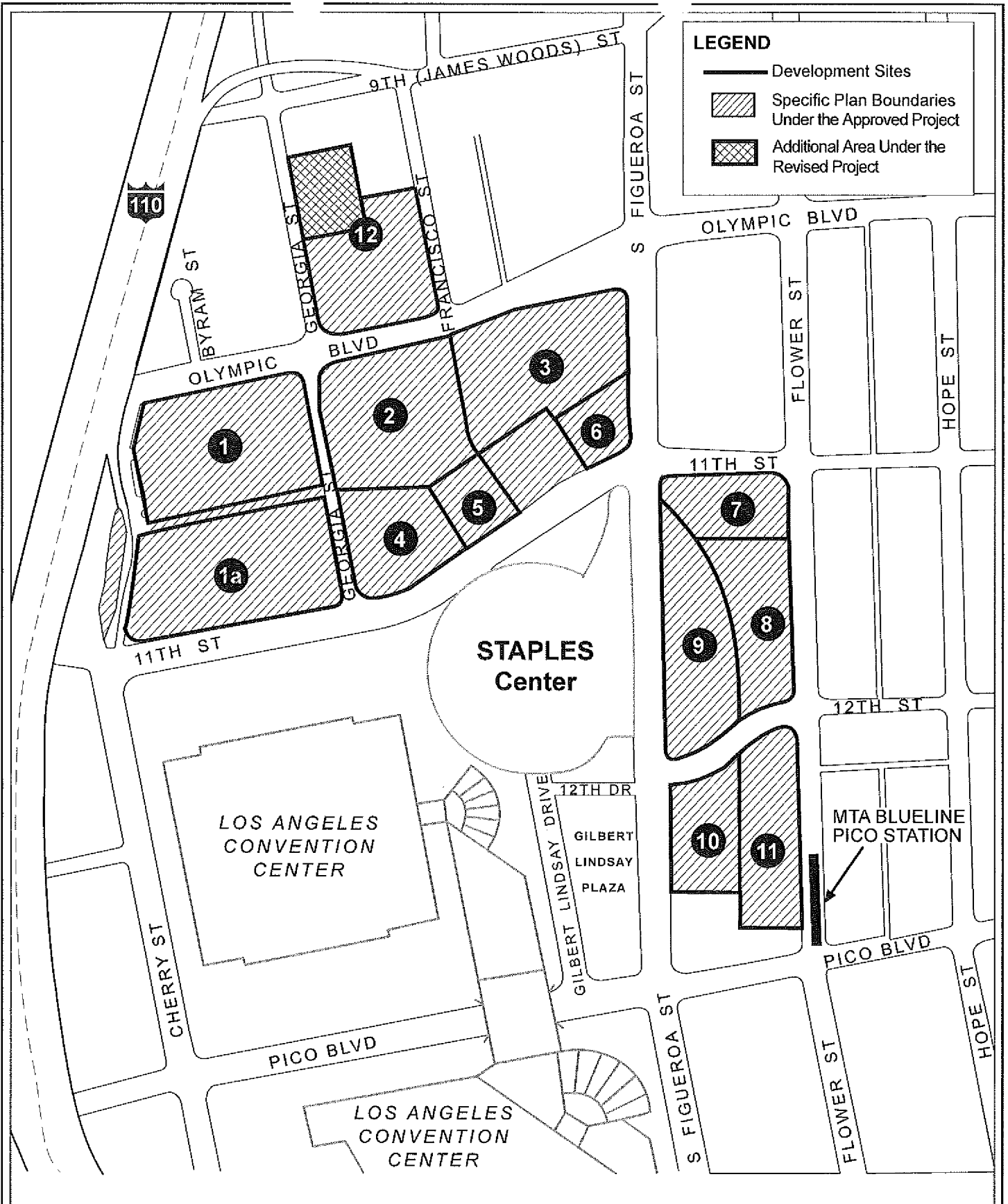


**LEGEND**

-  Specific Plan Boundaries Under the Approved Project
-  Additional Area Under the Revised Project

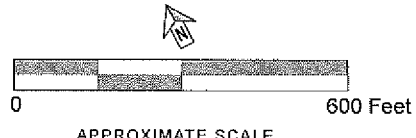


**Figure 2**  
LASER Specific Plan Boundaries



**LEGEND**

- Development Sites
- Specific Plan Boundaries Under the Approved Project
- Additional Area Under the Revised Project



**Figure 3**  
Specific Plan Development Sites

Source: Matrix Environmental, 2009

- Olympic North Subarea – The southern portion of the block bounded by Georgia Street on the west, Francisco Street on the east, 9th Street on the north, and Olympic Boulevard on the south. The Olympic North Subarea consists of one development site (No. 12).
- Figueroa Central Subarea – The entire block bounded by Figueroa Street on the west, Flower Street on the east, 11th Street on the north, and 12th Street on the south. The Figueroa Central Subarea consists of three development sites (Nos. 7, 8, and 9).
- Figueroa South Subarea – The block bounded by Figueroa Street on the west, Flower Street on the east, 12th Street on the north, and almost to Pico Boulevard on the south. The Figueroa South Subarea consists of two development sites (Nos. 10 and 11).

The remaining city block located outside of the LASED Specific Plan area, but included in the Final EIR, is located north and east of the Specific Plan area and is described as follows:

- Figueroa North Subarea – The southern portion of the block bounded by Figueroa Street on the west, Flower Street on the east, 9th Street on the north, and Olympic Boulevard on the south.

Construction activity is currently occurring across portions of the Olympic East Subarea and Olympic West Subarea. The Olympic North Subarea is currently occupied by surface parking lots. The entire LASED is located adjacent to STAPLES Center and in proximity to the Los Angeles Convention and Exhibition Center, which lies south of the Olympic Subareas and west of the Figueroa Subareas. Land uses that are adjacent to the Olympic Subareas to the north (west of Figueroa Street) include commercial uses, medical offices, offices, apartment buildings, a motel, the Hotel Figueroa, and restaurants. Land uses adjacent to the Figueroa Subareas include the Metro Blue Line light rail line, commercial offices, warehouses, the Variety Arts Center, a church, senior housing and other residential uses. A number of off-site development projects currently under construction are primarily located east of the LASED.

## **B. Overview of the LASED EIR**

In 2001, an Environmental Impact Report for the LASED (the "Final EIR") was prepared, evaluating the environmental impacts of the LASED, which at that time included four City blocks, or subareas, in the LASED Specific Plan area, (i.e., Olympic West, Olympic East, Figueroa Central and Figueroa South) plus the Olympic North Subarea, as described above, and the Figueroa North Subarea, which is located on the southern portion



of the block bounded by Flower Street, Olympic Boulevard, Figueroa Street, and 9th Street. The LASED Project evaluated in the Final EIR involved a total of approximately four million square feet of development.

As the LASED Specific Plan is a conceptual planning document, mechanisms are available to revise the Specific Plan as development trends and market conditions warrant. One such mechanism is the Plan's Equivalency Matrix, which allows for the exchange of certain land uses and floor areas within the LASED Specific Plan area (provided certain restrictions and conditions are followed as outlined in the Land Use Equivalency Matrix). Another mechanism is the ability of the City to amend the LASED Specific Plan and to establish vesting tract maps as market conditions warrant. Thus far, ten Project Permit Compliance Applications (PPCR) and several supporting Addendums to the Final EIR have been approved by the City of Los Angeles City Planning Department for development within the LASED Specific Plan area. These actions are summarized below in chronological order:

### **1. Nokia Theater (Case No. DIR-2005-1341-SPP-SPPA)**

Case No. DIR-2005-1341-SPP-SPPA for the 7,100-seat Nokia Theater was reviewed and approved by the City of Los Angeles City Planning Department on August 15, 2005. Case No. DIR-2005-1341-SPP-SPPA involved a Project Permit Compliance Review ("PPCR") to allow the transfer of the live theatre within Development Site 3 to Development Sites 4 and 5, all located within the Olympic East Subarea, on the block bounded by Figueroa Street, 11th Street, Georgia Street, and Olympic Boulevard. With the approval of this PPCR, the land use mix for the LASED was as follows: (1) a major convention hotel with a total of 1,200 rooms; (2) a second 600-room hotel; (3) up to 845,000 gross square feet ("GSF") of retail/entertainment/restaurant uses, including a 7,100-seat live theater; (4) up to 870,000 GSF of residential uses (800 dwelling units); (5) up to 75,000 GSF of office/sports medicine uses; (6) a health sports club of up to 120,000 GSF; (7) 250,000 GSF for expansion of the Los Angeles Convention Center; (8) an open air plaza to feature year-round venues; and (9) support parking.

### **2. Olympic East Subarea (Case No. DIR-2005-7920-SPP)**

Case No. DIR-2005-7920-SPP was reviewed and approved by the City of Los Angeles City Planning Department on November 30, 2005. Case No. DIR-2005-7920-SPP involved a PPCR to allow the construction of a three level, approximately 816 space subterranean parking garage consisting of approximately 455 standard parking spaces, 343 compact parking spaces, and 18 handicap accessible parking spaces. This parking structure provides parking for several uses within the Specific Plan area.

### **3. Figueroa South Project (Case Nos. DIR-2005-5518-SPP-SPPA-M1 and APCC-2006-3868SPE-SPP)**

The City approved Case Nos. DIR-2005-5518-SPP-SPPA-M1 (May 12, 2006) and APCC2006-3868-SPE-SPP (May 5, 2006) for the Figueroa South Project, located on the block bounded by 11th Street, Flower Street, 12th Street, and Figueroa Street (i.e., Figueroa South Subarea or Development Sites 10 and 11). The entitlement for the Figueroa South Project allows for an 870,000-square-foot mixed-use development, providing a total of 648 residential condominiums within two towers (a 35-story, 400-foot East Tower and a 23-story 250-foot West Tower connected by a 40 to 50-foot podium), 23,000 square feet of retail/entertainment/restaurant uses, and a minimum of 862 parking spaces. (The Figueroa South Urban Design regulations allow a maximum building height of 350 feet; however, an LASED Specific Plan Exception was approved to allow an increase in 50 feet in building height and building footprint coverage of 34 percent in lieu of 20 percent of the lot area.) The Figueroa South Subarea is part of Vesting Tract Map No. 53384 which was recorded on June 11, 2003. Both the Figueroa Central and the Figueroa South Subareas were included in Tract Map No. 53384. The Figueroa South Subarea includes Ground Lot 2 and Airspace Lots 14 – 19.

### **4. Olympic West Subarea (Case No. DIR-2006-4043-SPP)**

Case No. DIR-2006-4043-SPP was reviewed and approved by the City of Los Angeles City Planning Department on October 5, 2006. Case No. DIR-2006-4043-SPP involved a PPCR to allow the construction of a five level, approximately 2,699 space subterranean and above-ground parking garage consisting of 1,964 standard parking spaces, 698 compact parking spaces, and 37 handicap accessible parking spaces. This project would also provide parking for several uses within the Specific Plan area, and also included two 63-foot high structural elements that would eventually accommodate freeway signage.

### **5. Building B (Case No. APCC-2006-8393-SPE-SPP)**

Case No. APCC-2006-8393-SPE-SPP was reviewed and approved by the City of Los Angeles City Planning Department on October 24, 2006. Case No. APCC-2006-8393-SPE-SPP involved a PPCR to allow the construction of an 112,000 square foot, maximum 110-foot high, building containing 32,600 square feet of restaurant uses, 4,400 square feet of retail uses, 75,000 square feet of sports broadcast office uses, and the construction of the adjacent 30,300 square foot public plaza. The PPCR modified the Specific Plan development by transferring 75,000 square feet of office uses from Development Site 3 to Development Site 6 and transferring 73,000 square feet of retail/entertainment/restaurant uses from Development Site 6 to Development Site 3.

## **6. Figueroa Central Project (Case No. DIR-2005-7453-SPP-SPPA-M1)**

The LA Central Project, Case No. DIR-2005-7453-SPP-SPPA-M1, was approved by the City Planning Department on January 29, 2007 for the Figueroa Central Subarea, located on the block bounded by 11th Street, Flower Street, 12th Street, and Figueroa Street, and including Development Sites 7, 8, and 9. The Project included modifications to a previously approved case, Case No. DIR-2005-7453-SPP-SPPA (December 14, 2005). The Figueroa Central Subarea is part of Vesting Tract Map No. 53384 which was recorded on June 11, 2003. Both the Figueroa Central and the Figueroa South Subareas were included in Tract Map No. 53384. The Figueroa Central Subarea includes Ground Lot 1 and Airspace Lots 3 – 13.

Case No. DIR-2005-7453-SPP-SPPA-M1 involved a PPCR to allow for changes to the previous entitlement for the Figueroa Central Subarea, specifically: (1) an increase of 160 residential units and 22,600 square feet of residential floor area thereby yielding within this subarea a total of 860 residential units and 883,900 square feet of residential floor area, (2) a decrease in retail/entertainment floor area from 212,000 square feet to 189,400 square feet, (3) an increase of 100 parking spaces to 1,930 spaces, and (4) an increase of 24,000 square feet of open space to 129,000 square feet. As entitled, the LA Central Project was approved for two towers, the 494-foot North Tower and 350-foot South Tower, and a connecting podium. A ground level public plaza was included along Flower Street. A minimum of 1,311 parking spaces are required within a four-level, below-grade parking structure. All required grading, foundation, and other site preparation work for Development Sites 7, 8, and 9 was also entitled pursuant to the January 29, 2007 approval.

## **7. Specific Plan Amendment (SPA-1)**

On August 31, 2006, the City prepared an Addendum to the Final EIR to allow for increased development within the overall LASED Project (which includes the Figueroa North Subarea). The Addendum modified the development program within the LASED Project area to allow the total amount of permitted development to increase by 1,463,429 square feet from 4,146,276 square feet to 5,609,705 square feet. In addition, the Specific Plan Addendum also facilitated the incorporation of the Olympic North Subarea into the LASED area and LASED Specific Plan area, and increased the overall amount of development permitted in the LASED Specific Plan area. Specifically, the amendment increased the overall development in the Specific Plan area to 5,147,429 square feet through an increase in the amount of retail/entertainment/restaurant, hotel, office, and residential uses, as well as through the development of a cinema and ballroom space to support the Convention Center hotel. The amendment also increased the maximum tower height on the Olympic East Subarea to 660 feet and included modifications to allow a

redistribution of where signage could occur, as well as the types of signs permitted, throughout the LASED Specific Plan area. In January 2007, the LASED Specific Plan was amended to incorporate these changes.

## **8. Olympic East Subarea (Case No. DIR-2006-10272 SPP)**

Case No. DIR-2006-10272 SPP was reviewed and approved by the City of Los Angeles City Planning Department on February 20, 2007. Case No. APCC-2006-8393-SPE-SPP involved a PPCR to allow the construction of a 408,200 square foot mixed use office/restaurant/entertainment project on five levels, with a maximum height of 106 feet. Of the 408,200 square feet, 170,500 square feet would be developed with office uses and 237,700 square feet would be developed as retail/entertainment/restaurant commercial space. The 237,700 square feet of retail/entertainment/restaurant uses would consist of 137,000 square feet of entertainment uses (including a 71,900 square foot live theater and 34,000 square foot museum) and 100,700 square feet of restaurant uses. A total of 1,162 parking spaces would be provided – 756 spaces would be provided below grade on the Olympic East block, 78 spaces would be provided in the Olympic West parking garage, 150 spaces on the Olympic North Subarea, and 178 spaces off-site pursuant to the regulations of the Specific Plan.

## **9. Convention Center Hotel and Conference Center (Case No. DIR-2007-2148-SPP-SPPA)**

The Convention Center Hotel and Conference Center, Case No. DIR-2007-2148-SPP-SPPA was reviewed and approved by the City of Los Angeles Planning Department on June 28, 2007. Case No. DIR-2007-2148-SPP-SPPA involved a PPCR and Specific Plan Adjustment to allow the construction of a 1,478,335 square foot high rise Convention Center hotel and residential project, consisting of 975,230 square feet of hotel and ballroom uses and 503,105 square feet of residential uses. The approved development includes 224 residential condominium units, 1,001 hotel rooms and retail and restaurant uses ancillary to the hotels. The Convention Center Hotel will be located on the northwest corner of the Olympic East Subarea, in conjunction with a Hotel Conference Center located on the Olympic West Subarea. The overall tower height of the project is 660 feet, with an additional 109 foot podium. The PPCR resulted in 79 hotel rooms, 91,770 square feet of hotel uses, 1 residential unit and 895 square feet of residential uses less than that anticipated in the Specific Plan.

## **10. Figueroa Central Subarea (Case Nos. DIR-2005-7453-SPP-SPPA-M2 & CPC-2007-1238-SPA-DA)**

The LA Central Project, Case No. DIR-2005-7453-SPP-SPPA-M2, was approved by the City Planning Department on September 28, 2007 for the Figueroa Central Subarea. Case CPC-2007-1238-SPA-DA included modifications to the prior City approval for this site to allow increased development within the subarea. Specifically, Case CPC-2007-1238-SPA-DA includes: (1) an increase of 125,539 square feet of residential floor area thereby yielding within this subarea a total of 860 residential units and 1,009,439 square feet of residential floor area, (2) a decrease in retail/entertainment floor area from 189,400 square feet to 174,769 square feet, (3) the development of 1,980 square feet of sports bar floor area; (4) the development of 47,485 square feet of health club floor area; (5) the development of 222 hotel rooms, with a total of 206,593 square feet of hotel floor area; and (6) an increase of 13,665 square feet of open space for a total of 142,665 square feet of open space. Overall, the total allowable development on the Figueroa Central Subarea was increased 368,101 square feet to a total of 1,488,101 square feet of allowable development.

As entitled, the LA Central Project was approved for two towers, a 494-foot North Tower and 350-foot South Tower. Case CPC-2007-1238-SPA-DA increased the maximum allowable height of the North Tower 81 feet to permit a tower 575 feet above grade and increased the maximum allowable height of the South Tower 105 feet to permit a tower 455 feet above grade. A minimum of 1,930 parking spaces would continue to be provided.

## **11. Specific Plan Amendment (SPA-2)**

In order to account for the modifications to the LA Central Project (Case Nos. DIR-2005-7453-SPP-SPPA-M2 & CPC-2007-1238-SPA-DA discussed above), the City prepared an addendum to the Final EIR (and associated Addendums) and amended the LASED Specific Plan to allow for increased development within the overall LASED Specific Plan area. The Specific Plan amendment modifies the development program within the LASED Specific Plan area to allow the total amount of permitted development to increase by 1,368,825 square feet from 4,146,276 square feet to 5,515,101 square feet. The LASED Specific Plan was amended to incorporate these changes on November 30, 2007.

## **12. Regal Cinemas (Case No. DIR-2007-5865-SPP-SPPA)**

Following the approval of second Specific Plan Amendment, the Regal Cinemas project (Case No. DIR-2007-5965-SPP-SPPA) was reviewed and approved by the City of Los Angeles Planning Department on February 7, 2008. Case No. DIR-2007-5865-SPP-SPPA involved a PPCR and Specific Plan Adjustment to allow construction of Regal

Cinemas, an approximately four level, 127,327 square foot cinema that will include 14 screens and approximately 3,780 seats, located on Development Site 1 of the Olympic West Subarea. The PPCR approval included a land use equivalency transfer, as permitted under the Specific Plan, to convert 1,474 square feet of unused hotel and ballroom uses located on Development Site 1 to 7,327 square feet of cinema uses.

## **C. Vesting Tentative Tract Maps**

In addition to the above entitlement actions within the LASED Specific Plan area, two Vesting Tentative Tract Maps and supporting Initial Studies/Mitigated Negative Declarations (IS/MNDs) have been approved for development within the Figueroa North Subarea which was part of the original LASED Project analyzed in the Final EIR, but is not part of the LASED Specific Plan. Each of these entitlements is discussed briefly, below.

### **1. Hanover Project (Case No. ENV-2004-7066-MND)**

Case No. ENV-2004-7066-MND for the Hanover Project was approved by the City Planning Department on March 15, 2005, following release of an MND on March 1, 2005. Case No. ENV-2004-7066-MND involved approval of a Vesting Tentative Tract Map (Tract No. 062006) for a 26-story mixed-use tower providing 156 multi-family residential units, 7,499 square feet of ground-floor commercial uses, and 228 parking spaces within the Figueroa North Subarea, located on the block bounded by Flower Street, Olympic Boulevard, Figueroa Street, and 9th Street.

### **2. FIDM Project (Case No. ENV-2005-2905-EAF)**

An IS/MND for Case No. ENV-2005-2905-EAF, the Fashion Institute of Design and Merchandising (FIDM) Project, was released by the City of Los Angeles City Planning Department on October 19, 2006. The FIDM Project is located on the block bounded by 9th Street, Flower Street, Olympic Boulevard, and Figueroa Street, (i.e., the Figueroa North Subarea) and is adjacent to the Hanover Project, discussed previously. Case No. ENV-2005-2905-EAF involves approval of a Vesting Tentative Tract Map (Tract No. 062298) for a 21-story mixed-use tower providing 112 residential units and 90,000 square feet of non-residential floor area, for a total of 250,740 square feet of floor area, and 366 parking spaces.

## **D. Description of the Approved Project**

All references within this Addendum to the currently entitled Project (the "Approved Project") reflect conditions inclusive of the PPCR approvals, vesting tract maps, and LASED Specific Plan amendments discussed above. Development permitted under the Approved Project is shown in Table 1, on page 19. As shown therein, the existing LASED Specific Plan permits 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, for a total of 5,977,806 square feet within the LASED area.

As the primary subject of this Addendum is the proposed changes to the size and development profile for the Olympic North Subarea, the following outlines the currently permitted development within this portion of the LASED. A total of 500,000 square feet of development is permitted on the Olympic North Subarea, comprised of 350,000 square feet (400 rooms) of hotel floor area and 150,000 square feet (100 dwelling units) of residential floor area. As set forth in the LASED Specific Plan, allowable building heights within the Olympic North Subarea are defined in terms of a 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 is 90 feet above grade, whereas the maximum permitted tower height is 200 feet above existing grade. The footprint of all towers within the Olympic North Subarea shall not exceed 60 percent of the total land within this subarea.

## **E. Description of the Revised Project**

The proposed revisions to the Approved Project are proposed 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 square footage permitted in the Olympic North Subarea.

The Revised Project is described as follows: (1) increasing the maximum allowable development within the LASED from 5,977,806 square feet to 6,290,018 square feet; (2) increasing the maximum 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

Table 1  
Approved Project - Entitled LASED Development Program

	Hotel and Ballroom			Residential			Retail/ Entertainment/ Restaurant	Total
	Convention Center Expansion	Cinema	Square Footage	Rooms	Office	Square Footage		
<b>SPECIFIC PLAN AREA</b>								
Olympic West		127,327	203,526					330,853
1								
1a	250,000							250,000
1b <sup>a</sup>								
Olympic East			862,000	1,080	170,500	504,000	225	1,366,000
2								408,200
3								195,500 <sup>b</sup>
4 and 5					75,300			112,300
6								
Figueroa Central			207,376	222		1,009,439	860	1,488,101
7-9								
Figueroa South						822,000	648	870,000
10 and 11								
Olympic North			350,000	400		150,000	100	500,000
12								
<b>TOTAL LASED SPECIFIC PLAN</b>	<b>250,000</b>	<b>127,327</b>	<b>1,622,902</b>	<b>1,702</b>	<b>245,800</b>	<b>2,485,439</b>	<b>1,833</b>	<b>5,515,101<sup>c</sup></b>
Figueroa North					95,706	359,500	268	462,700
<b>TOTAL LASED AREA</b>	<b>250,000</b>	<b>127,327</b>	<b>1,622,902</b>	<b>1,702</b>	<b>341,506</b>	<b>2,844,939</b>	<b>2,101</b>	<b>5,977,806<sup>c</sup></b>

<sup>a</sup> LASED Parking shall be permitted on Development 1b.

<sup>b</sup> Includes a 7,100-seat live theater.

<sup>c</sup> This total does not equal the sum of the Approved Project uses since although Case No. DIR-2007-5965-SPP-SPPA allowed for additional cinema square footage, it did not increase the overall square footage permitted in the Specific Plan area.

Source: LASED Specific Plan, amended November 30, 2007.



from 25.28 acres to 25.97 acres, and the acreage within the overall LASED from 27.1 acres to 27.8 acres; (5) increasing the maximum allowable tower height in the Olympic North Subarea from 200 feet to 350 feet above existing grade (exclusive of rooftop elements); (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; (9) zoning the expanded portion of the Olympic North Subarea in accordance with the LASED Specific Plan; and (10) modifying a limited number of LASED Specific Plan development standards. Table 2 on page 21 shows the development program for the LASED under the Revised Project.

## 1. Olympic North Subarea

All development proposed to be added to the LASED Specific Plan under the Revised Project would occur within the Olympic North Subarea. Development within the Olympic North Subarea under the Revised Project would consist of the following: 206,500 square feet (275 rooms) of hotel and ballroom floor space, 89,250 square feet (65 dwelling units) of residential floor area, 335,300 square feet of general office floor area and 266,500 square feet of broadcasting studio and production floor area. When added to what was previously permitted, this development profile would increase the total permitted development within the Olympic North Subarea from 500,000 square feet to 897,550 square feet.

The total residential and hotel development currently permitted in the Olympic North Subarea under the LASED Specific Plan would not be realized. For instance, the Revised Project would include 89,250 square feet (65 dwelling units) of residential floor area, which is 60,750 square feet and 35 dwelling units less than the 150,000 square feet and 100 dwelling units currently permitted under the LASED Specific Plan. Similarly, the Revised Project would include 206,500 square feet (275 rooms) of hotel floor area, which is 143,500 square feet and 125 rooms less than the 350,000 square feet and 400 rooms currently permitted under the LASED Specific Plan. As a result, one of the modifications to the LASED Specific Plan under the Revised Project would be to reduce the amount of hotel and residential development permitted in the Olympic North Subarea to balance uses in the Subarea with both daytime and nighttime activities, thereby maximizing efficient parking. These reductions would result in a new maximum of 897,550 square feet of development allowed in the Olympic North Subarea.

II. Project Description

Table 2  
Proposed Project - Proposed LASED Development Program

	Convention Center Expansion	Hotel and Ballroom			Residential			Retail/ Entertainment/ Restaurant	Total
		Cinema	Square Footage	Rooms	Office	Square Footage	Units		
<b>SPECIFIC PLAN AREA</b>									
Olympic West									
1		127,327 <sup>a</sup>	170,165						297,492
1a	250,000								250,000
1b <sup>b</sup>									
Olympic East									
2			805,065	1,001	170,500	503,105	224	237,700	1,308,170
3								195,500 <sup>c</sup>	408,200
4 and 5					75,300			37,000	195,500
6									112,300
Figueroa Central									
7-9			207,376	222		1,009,439	860	271,286	1,488,101
Figueroa South									
10 and 11						822,000	648	48,000	870,000
Olympic North									
12			206,500	275	601,800 <sup>d</sup>	89,250	65	789,486	897,550
<b>TOTAL PROPOSED LASED SPECIFIC PLAN</b>	<b>250,000</b>	<b>127,327</b>	<b>1,389,106</b>	<b>1,498</b>	<b>847,600</b>	<b>2,423,794</b>	<b>1,797</b>	<b>789,486</b>	<b>5,827,313</b>
Figueroa North					95,706	359,500	268	7,499	462,705
<b>TOTAL PROPOSED LASED AREA</b>	<b>250,000</b>	<b>127,327</b>	<b>1,389,106</b>	<b>1,498</b>	<b>943,306</b>	<b>2,783,294</b>	<b>2,065</b>	<b>796,985</b>	<b>6,290,018</b>
<b>TOTAL EXISTING ENTITLEMENTS</b>	<b>250,000</b>	<b>127,327</b>	<b>1,622,902</b>	<b>1,702</b>	<b>341,506</b>	<b>2,844,939</b>	<b>2,101</b>	<b>796,985</b>	<b>5,977,806<sup>e</sup></b>
Compared to Existing Entitlement	0	0	-233,796	-204	+601,800	-61,645	-36	0	+312,212

<sup>a</sup> Includes an additional 7,327 square feet of cinema uses approved pursuant to Case No. DIR-2007-5965-SPP-SPPA, using floor area obtained through a land use equivalency transfer from hotel and ballroom floor area on Development Site 1.

<sup>b</sup> LASED Parking shall be permitted on Development 1b.

<sup>c</sup> Includes a 7,100-seat live theater.

<sup>d</sup> Includes technical, production space, lobbies, and studio uses.

<sup>e</sup> This total does not equal the sum of the Approved Project uses since although Case No. DIR-2007-5965-SPP-SPPA allowed for additional cinema square footage, it did not increase the overall square footage permitted in the Specific Plan area.

Source: LASED Specific Plan, amended November 30, 2007.

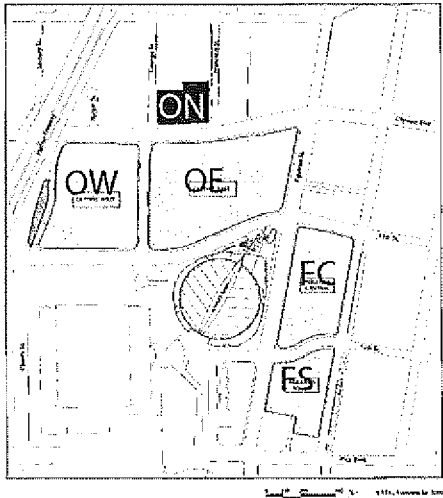
To further reduce the impact of the additional development proposed in the Olympic North Subarea, the development permitted on Development Site 1 in the Olympic West Subarea and Development Site 2 in the Olympic East Subarea would be reduced. The Revised Project would reduce the maximum permitted square footage 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 862,000 square feet of hotel and ballroom uses (1,080 rooms) and 504,000 square feet of residential uses (225 residential units) to 805,065 square feet of hotel and ballroom uses (1,001 rooms) and 503,105 square feet of residential uses (224 residential units). Table 2 on page 21 details the development summary changes for the LASED.

To accommodate the additional development proposed within the Olympic North Subarea, the size of the subarea would be increased by extending the northern boundary northward, so that the subarea encompasses a greater portion of the block bounded by Georgia Street on the west, Francisco Street on the east, 9th Street on the north, and Olympic Boulevard on the south. Extending the Olympic North Subarea's northern boundary would increase the size of the subarea by 1.48 acres to a total of 2.17 acres. In addition, to permit the development proposed on the Olympic North Subarea under the Revised Project, the newly added portion of the subarea would be zoned "LASED" to be consistent with the balance of the LASED Specific Plan area. The building height and massing permitted on the Olympic North Subarea under the existing and amended LASED Specific Plan is detailed in Figures 4 and 5 on pages 23 and 24, respectively.

As established by the LASED Specific Plan, the maximum tower height permitted on the Olympic North Subarea is 200 feet above existing grade. To accommodate the Revised Project, the LASED Specific Plan would be amended to permit a maximum tower height of 350 feet above existing grade (exclusive of rooftop elements) on the subarea. While the Revised Project modifies the tower height permitted within the Olympic North Subarea, no revisions to the Specific Plan regulations pertaining to setbacks, lot coverage requirements, or to the maximum permitted podium height of 90 feet above grade would be required. Other than the reductions in permitted development discussed above, no 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. Under the Revised Project, the Olympic North Subarea would be developed with two separate buildings. Additional detailed descriptions of the two proposed buildings are provided below under separate subheadings.

#### (a) Office/Studio and Production Component

The western portion of the proposed Olympic North Subarea would be developed with a 23-story tower that would rise 350 feet above existing grade (exclusive of rooftop elements) and would provide two levels of subterranean parking. The tower would provide



SUB-AREA LOCATION

TOWER MAY BE LOCATED ANYWHERE WITHIN THIS ENVELOPE

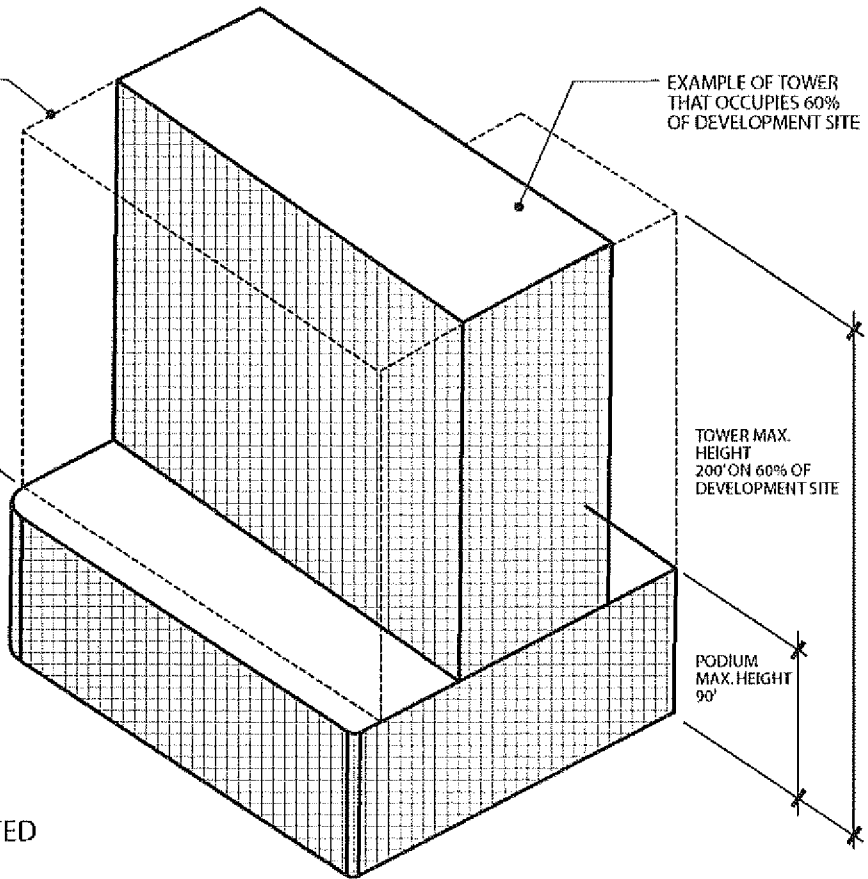
EXAMPLE OF TOWER THAT OCCUPIES 60% OF DEVELOPMENT SITE

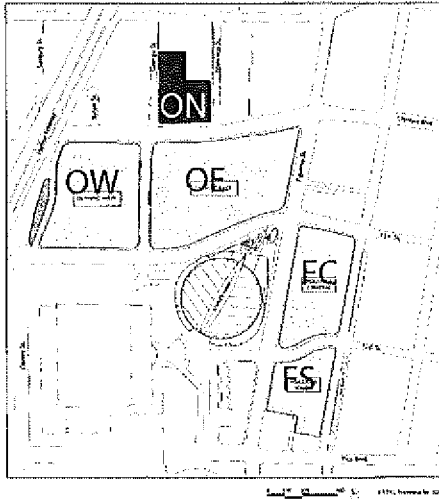
SETBACK TO TOWER 20' (Olympic)

TOWER MAX. HEIGHT 200' ON 60% OF DEVELOPMENT SITE

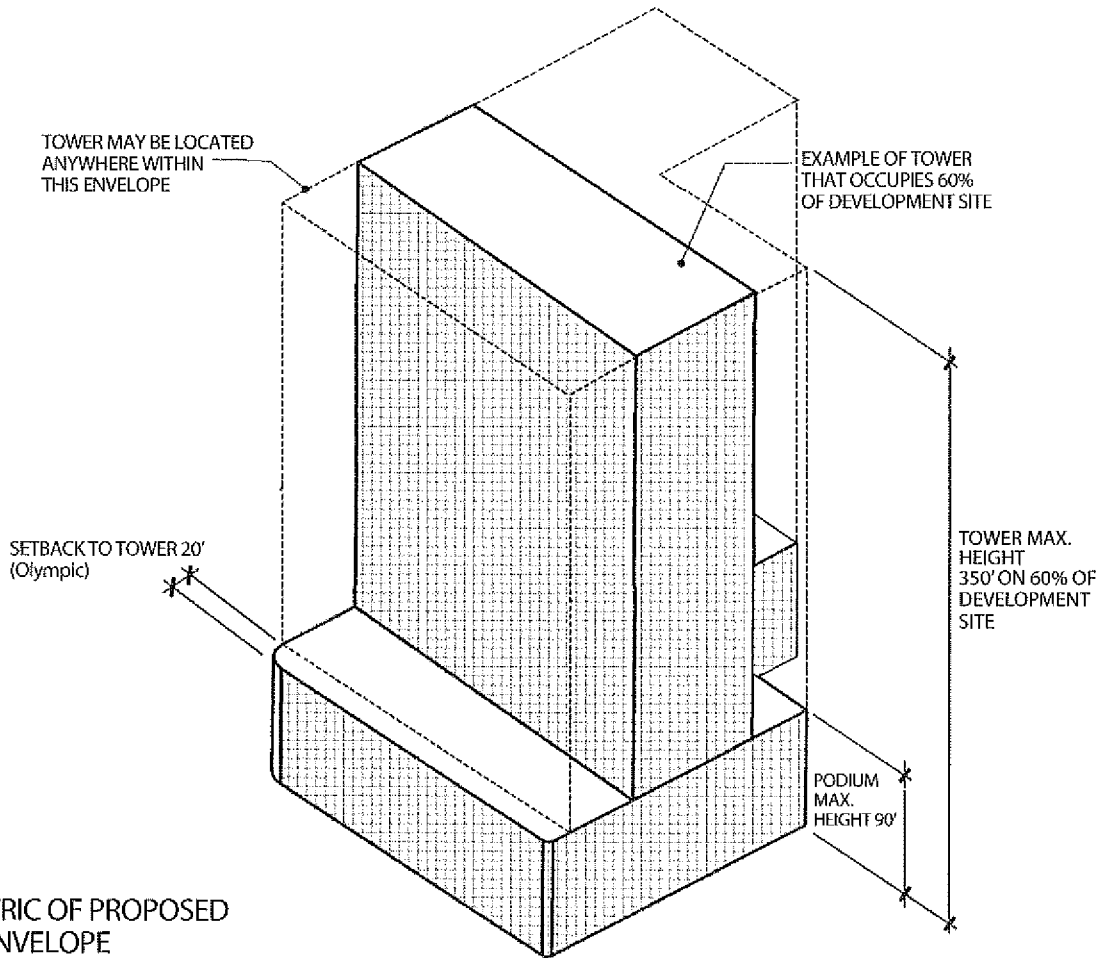
PODIUM MAX. HEIGHT 90'

AXONOMETRIC OF PERMITTED BUILDING ENVELOPE





SUB-AREA LOCATION



AXONOMETRIC OF PROPOSED BUILDING ENVELOPE



**Figure 5**  
Proposed Allowable Building Height & Massing:  
Olympic North Sub-Area

Source: RTKL Associates, Inc., March 2007

335,300 square feet of general office floor area and 266,500 square feet of broadcasting studio and production floor area. Studio uses would comprise the majority of the first two floors, while office space would comprise the majority of the remaining 19 floors.

### (b) Hotel and Residential Component

The eastern portion of the revised Olympic North Subarea would be developed with a 25-story hotel/residential tower. The 25-story tower would rise to a maximum of 350 feet above existing grade (exclusive of rooftop elements) and would provide subterranean parking. The tower would provide a total of 295,750 square feet of hotel and residential floor area, comprised of the following: 206,500 square feet (275 rooms) of hotel floor area; and 89,250 square feet (65 dwelling units) of residential floor area.

## 2. Parking and Circulation

Parking for the Revised Project would be provided in accordance with LASED Specific Plan requirements. In total, the Revised Project would provide 8,338 spaces, with 7,083 spaces located throughout the LASED area and 1,255 spaces located at off-site locations within 1,500 feet of the LASED area. The increased development on the Olympic North Subarea would require 743 parking spaces; 300 of which would be provided in subterranean parking facilities on the Olympic North Subarea, while the remaining 443 parking spaces would be provided within other portions of the LASED Specific Plan area and/or at off-site locations within 1,500 feet of the LASED Specific Plan boundary. The Revised Project would continue to implement the access and circulation design as set forth under the Approved Project; however, minor modifications would be made to the circulation pattern within the Olympic North Subarea. Specifically, one private, east-west internal circulation road would be constructed on the Olympic North Subarea, which would provide access to parking areas and service loading areas.

## 3. Project Design

The urban design of the Revised Project's proposed buildings would be in accordance with the urban design regulations and design guidelines set forth in the LASED Specific Plan. The current design for the two towers proposed for the Olympic North Subarea would be contemporary in architectural style and character and would complement the existing LASED buildings, the STAPLES Center and the Convention Center in architecture, signage, lighting, landscape, and hardscape treatments. Additionally, the Revised Project would include open space amenities for the residential uses in accordance with the requirements of the LASED Specific Plan. Further, all signage would be designed and installed in accordance with the signage regulations set forth in the LASED Specific Plan. The Revised Project would result in an increase in signage on the

Olympic North Subarea as compared to that anticipated in the L.A. Live Conceptual Sign Plan filed with the City in October 2006; however, the total amount of signage would be consistent with the LASED Specific Plan, which would permit a maximum total of 17,205 square feet of signage on the Olympic North Subarea without exceeding the maximum amount of signage permitted for L.A. Live pursuant to Specific Plan Section 16.C.18.

Under the Revised Project, service areas, parking areas, and mechanical/equipment areas would be screened from public view. Landscaping for the Revised Project would extend the pedestrian-oriented environment that exists within the LASED which promotes pedestrian safety and comfort while building a strong interface between the buildings and sidewalks. Extensive landscaping on the perimeter of the Olympic North Subarea would enhance the existing aesthetic quality of the area and would place the emphasis on the street and other common spaces proposed to occur throughout the LASED.

## **F. Necessary Actions**

As the Revised Project would include changes that have the potential to affect the physical environment (i.e., increase in development, increase in the LASED Specific Plan area, changes to permitted building, etc.), the Revised Project requires further analysis under CEQA. This Addendum serves as the environmental documentation required pursuant to CEQA. This Addendum, along with the Final EIR and its subsequent Addendums cover all discretionary approvals that may be required to construct or implement the Revised Project, whether or not listed below. These approvals include, but are not limited to:

- Approval of LASED Specific Plan Amendments;
- Approval of a Zone Change for the expanded portion of the Olympic North Subarea;
- Approval of Project Permit Compliance Review applications for individual projects seeking to implement the Revised Project;
- Modification of the previously approved LASED Development Agreement;
- Adoption of an Implementation Agreement to the Disposition and Development Agreement covering the LASED;
- Approval of a lot line adjustment; and
- Any additional actions as may be deemed necessary to fully implement the Revised Project.

### **III. Environmental Impact Analysis**

---

#### **A. Land Use**

##### **1. Approved Project Impacts**

The analysis of land use impacts in the Final EIR and subsequent environmental documentation considered whether the Approved Project would conflict with adopted land use policies, plans, or regulations and whether the Project would be compatible with existing land uses.

The Approved Project, as shown in Table 3 on page 28, 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 FAR allowed by the LAMC. These include the Figueroa Central Subarea (with a FAR of 7.41), the Figueroa South Subarea (with a FAR of 7.25), and the Olympic North Subarea (with a FAR of 7.77). As a result, these subareas are above the 6.0 maximum FAR permitted in the 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 FAR of up to 13:1 pursuant to the transfer of floor area provisions of the LASED Specific Plan.<sup>2</sup> In addition, the City granted a variance with regard to the Hanover Project that permitted the FAR on the portion of the Figueroa North Subarea in which the Hanover Project is located to exceed a FAR of 6:1.

The Final EIR included an analysis of Project consistency with applicable plans and Los Angeles Municipal Code (LAMC) provisions. The Project Permit Compliance Review ("PPCR") approvals for individual development projects since the certification of the Final EIR confirm that the Approved Project is consistent with the Final EIR and thus do not alter the Final EIR's conclusions regarding consistency with applicable plans and the LAMC. Each of the two subsequent Addendums also analyzed this issue and concluded that the proposed changes addressed in those documents were also consistent with the Final EIR's

---

<sup>2</sup> *Central City Community Plan, Footnote 11; January 8, 2003.*



**Table 3  
Floor Area Ratios (FAR)**

Development Site	Approved Project			Revised Project			
	Site Area	Development (sf)	FAR	Site Area	Development (sf)	FAR	
<i>Olympic West</i>							
1		330,853			297,492		
1A		250,000			250,000		
	<i>Subtotal</i>	<i>303,270</i>	<i>580,853</i>	<i>1.92</i>	<i>303,270</i>	<i>547,492</i>	<i>1.81</i>
<i>Olympic East</i>							
2		1,366,000			1,308,170		
3		408,200			408,200		
4 and 5		195,500			195,500		
6		112,300			112,300		
	<i>Subtotal</i>	<i>412,841</i>	<i>2,082,000</i>	<i>5.04</i>	<i>412,841</i>	<i>2,023,900</i>	<i>4.90</i>
<i>Figueroa Central</i>							
7, 8, 9		1,488,101			1,488,101		
	<i>Subtotal</i>	<i>200,875</i>	<i>1,488,101</i>	<i>7.41</i>	<i>200,875</i>	<i>1,488,101</i>	<i>7.41</i>
<i>Figueroa South</i>							
10 and 11		870,000			870,000		
	<i>Subtotal</i>	<i>119,997</i>	<i>870,000</i>	<i>7.25</i>	<i>119,997</i>	<i>870,000</i>	<i>7.25</i>
<i>Olympic North</i>							
12		500,000			897,550		
	<i>Subtotal</i>	<i>64,318</i>	<i>500,000</i>	<i>7.77</i>	<i>94,331</i>	<i>897,550</i>	<i>9.51</i>
<b>Entire LASED Specific Plan Area</b>	<b>1,101,301</b>	<b>5,515,101<sup>a</sup></b>	<b>5.01</b>	<b>1,131,314</b>	<b>5,827,313</b>	<b>5.15</b>	
<i>Figueroa North</i>							
	<i>Subtotal</i>	<i>57,492</i>	<i>462,705</i>	<i>7.19</i>	<i>57,492</i>	<i>462,705</i>	<i>7.19</i>
<b>Entire LASED</b>	<b>1,158,793<sup>b</sup></b>	<b>5,977,806<sup>a</sup></b>	<b>5.16</b>	<b>1,188,806</b>	<b>6,290,018</b>	<b>5.29</b>	

<sup>a</sup> This total does not equal the sum of the Approved Project uses since although Case No. DIR-2007-5965-SPP-SPPA allowed for additional cinema square footage, it did not increase the overall square footage permitted in the Specific Plan area.

<sup>b</sup> The total site area used to calculate LASED FAR does not include roadways and other public easements. When these areas are included, the total area of the LASED under the Approved Project equals 27.1 acres).

Source: Matrix Environmental, July 2009.

conclusion regarding consistency with applicable plans and the LAMC. Thus, via these respective and collective analyses, the Approved Project was found to be within the allowable densities, building heights and all other development standards regulated by the LAMC and/or the Central City Community Plan and thus, no significant impacts related to Approved Project consistency with the Central City Community Plan as well as the LAMC would occur.

The Approved Project, as analyzed in the Final EIR and subsequent Addendums, would also be consistent with the goals and policies set forth in the City of Los Angeles General Plan, including but not limited to the 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 the Southern California Association of Governments' (SCAG) Regional Comprehensive Plan and Guide (RCPG).

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; one which provides a full range of day and nighttime activities and uses that are desired and encouraged in order to achieve the long term realization of development strategies for the downtown area. Thus, it has been concluded that the Approved Project would be compatible with the majority of surrounding land uses. Based on the findings of the Final EIR and subsequent environmental documentation, no significant impacts regarding land use compatibility would occur with the Approved Project.

## 2. Revised Project Impacts

The Revised Project would modify the development program for the LASED as well as some of the regulations set forth in the LASED Specific Plan (e.g., the total amount and types of permitted development, building height, etc.). The land use implications of these proposed changes are identified and addressed in the following paragraphs.

The LASED Specific Plan area is currently defined as the Olympic West, Olympic East, Olympic North, Figueroa Central, and Figueroa South subareas. As part of the Revised Project, the Applicant is requesting that the allocation, amount, and type of individual land uses permitted on the Olympic North Subarea be modified to: (1) reduce the amount of hotel and ballroom floor area from 350,000 square feet (400 rooms) to 206,500 square feet (275 rooms); (2) reduce the amount of residential floor area from 150,000 square feet (100 dwelling units) to 89,250 square feet (65 dwelling units); (3) increase the amount of general office floor area from 0 square feet to 335,300 square feet; and (4) increase the amount of entertainment studio/production floor area from 0 to 266,500 square feet. This modified development profile would represent a 295,750-square-foot increase in the total development permitted within the subarea, bringing the total development permitted to 897,550 square feet (from 500,000 square feet).

By increasing the amount of development permitted on the Olympic North Subarea, the Revised Project would also increase the amount of development permitted within the overall LASED Specific Plan area. It is important to note that two of the approved projects

within the LASED did not realize the maximum permitted development on their respective subareas. Since no additional development is anticipated to occur within these subareas, in addition to modifying the amount of development permitted in the Specific Plan area as a result of modifications to the Olympic North Subarea, the Revised Project would also modify the amount of development permitted within the LASED Specific Plan to reflect the actual development that has occurred pursuant to all currently approved entitlements within the LASED. Specifically, as shown on Table 2 on page 14, the development permitted in the Specific Plan area would be modified to: (1) reduce the hotel and ballroom floor area from 1,622,902 square feet (1,702 rooms) to 1,389,106 square feet (1,498 rooms); (2) increase the amount of office floor area from 245,800 square feet to 847,600 square feet; and (4) reduce the amount of residential floor area from 2,485,439 square feet (1,833 dwelling units) to 2,423,794 square feet (1,797 dwelling units). Overall, the maximum allowable development within the LASED Specific Plan area would increase from 5,515,101 square feet to 5,827,313 square feet. When combined with the development permitted on the Figueroa North Properties, the overall development permitted in the LASED area would be increased from 5,977,806 square feet to 6,290,018 square feet. As the level of development proposed within the LASED Specific Plan exceeds the limitation of 5,515,101 square feet set forth within Sections 5.B and 6.B.1 of the LASED Specific Plan, a Specific Plan Amendment is required.

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 through 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, retail, 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 Specific Plan area.

The Revised Project also furthers 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." (Final 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 LASED area and Downtown Los Angeles. The Revised Plan also “implements a site plan that optimizes the synergy among the on-site uses.” (Final 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) As further described below in Section III.F of this Addendum (Transportation and Parking), the Revised Project would 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 Revised Project also complies with the City of Los Angeles General Plan (“General Plan”). The Revised Project furthers 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 Revised Project would further establish the Downtown Center as the primary center of cultural, entertainment and office uses. 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 Revised Project is also consistent with the Central City Community Plan (“Community Plan”). For example, the Revised Project furthers Community Plan Objective 2-1, which seeks to improve Central City’s competitiveness as a location for offices, business, retail and industry. The Revised Project would establish new office and broadcast/production uses in Central City. Locating such office and broadcasting uses within the LASED and near established uses such as the Grammy Museum, Nokia Theater and Staples Center would contribute to the identity of the LASED as an important location for the entertainment industry and associated uses. As described above, it would also be consistent with Objective 2-4, which seeks to encourage “uses which create an active 24-hour downtown environment for current residents and which would also foster increased tourism.”

On an overall basis, these changes reflect a continuation of the types and general quantities of development already anticipated to occur within the LASED, although with a greater emphasis on weekday uses than previous LASED development plans. With regard to the increase in office development under the Revised Project, it is important to note that a substantial amount of office development is included in the Approved Project and the increase in office floor area under the Revised Project reinforces the positive diversity of land uses that occur within, as well as around, the LASED. Thus, the proposed changes do not result in any land use impacts. Furthermore and as demonstrated throughout this 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 on an individual Subarea basis, as shown in Table 3 on page 28, would result in FARs between 1.81 and 9.51. Three of the LASED's six subareas would have FARs above the LAMC 6.0 maximum. Of these three areas, the Figueroa South Subarea was approved, pursuant to a PPCR issued by the City on December 14, 2005, with a FAR of 7.25. Additionally, the Figueroa Central Subarea was approved, pursuant to a PPCR on September 28, 2007 and associated Specific Plan Amendment on November 30, 2007, with a FAR of 7.41. Lastly, the Olympic North Subarea was approved, pursuant to the Specific Plan Amendment approved by the City on November 30, 2007, with a FAR of 7.77. In addition, the City granted a variance with regard to the Hanover Project that permitted the FAR on the portion of the Figueroa North Subarea in which the Hanover Project is located to exceed a FAR of 6:1. The Revised Project will result in the reduction of several FARs within the LASED area, while resulting in an increase in the FAR for the Olympic North Subarea. Specifically, the Revised Project would reduce the FAR for the Olympic West Subarea from 1.90 to 1.81 and would reduce the FAR of the Olympic East Subarea from 5.04 to 4.90. Regarding the Olympic North Subarea, although the size of the Olympic North Subarea would be increased, the proportional change in floor area is greater than the change in site area. As such, the Revised Project would increase the FAR for the Olympic North Subarea from the previously approved 7.77 to 9.51. The increase in FAR within the Olympic North Subarea is of a sufficient magnitude so as to cause an overall increase in FAR across the LASED Specific Plan area as well as the entire LASED. Specifically, under the Revised Project, the FAR for the LASED Specific Plan is increased from 5.01 to 5.15, whereas the FAR for the overall LASED is increased from 5.16 to 5.29. Nevertheless, although the Revised Project would increase the FAR for the LASED Specific Plan area and the LASED area as a whole, the Revised Project remains consistent with applicable density standards per the provisions of the Central City Community Plan since the overall FAR for the LASED Specific Plan area under the Revised Project would

be less than 6.0 (i.e., a FAR of 5.29).<sup>3</sup> Thus, as is the case with the Approved Project, the Revised Project would result in a less than significant impact with respect to this issue.

The Final EIR and subsequent Addendums analyzed a maximum tower height of 200 feet above grade (exclusive of rooftop elements) within the Olympic North Subarea. As part of the proposed Specific Plan amendment, the maximum height of the hotel tower would be increased to 350 feet above grade. No other changes to allowable building heights within the LASED Specific Plan area or the overall LASED is proposed under the Revised Project.

The proposed increase in building heights within the Olympic North Subarea would require modifications to the provisions of Section 10 of the LASED Specific Plan, which establishes height limits within the LASED Specific Plan area. The Olympic North Subarea is currently zoned "LASED", which pursuant to Section 12.04.C of the LAMC, limits heights to those established in Section 10 of the LASED Specific Plan. Thus, 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 the LASED Specific Plan. From a land use regulatory perspective, this component of the proposed Specific Plan Amendment does not result in any impacts as the Approved Project has always included a tower component within the Olympic North Subarea and the increase in the height of the towers permitted does not pose any inconsistencies with the LASED Specific Plan or any other land use regulation applicable to the LASED should the requested Specific Plan Amendment be approved by the City. 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). The Revised Project's proposed increase in height for the Olympic North Subarea is discussed in further detail in Section III.B of this Addendum (Aesthetics). These potential environmental impacts are addressed in this Addendum and the conclusions of these analyses are that the implementation of the proposed changes to the allowable tower height within the Olympic North Subarea would not result in any new significant impacts or in a substantial worsening of a previously identified significant impact.

No modifications to the Specific Plan regulations pertaining to setbacks, lot coverage requirements, or to the maximum permitted podium height of 90 feet above grade would be required. Further, no 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 allowed development in some areas to

---

<sup>3</sup> Based on a total of 5,827,313 square feet of development across a site area of 1,131,314 square feet within the LASED Specific Plan area (i.e., total LASED minus the Figueroa North Subarea).

accommodate the increased square footage permitted in the Olympic North Subarea. Thus, increasing the tower height to 350 feet would not create any new significant impacts or substantially worsen a previously identified significant impact.

All other aspects of the Revised Project are consistent with the land use regulations of the LASED Specific Plan. Thus, upon approval of the proposed Specific Plan Amendment, development under the Revised Project, as with the Approved Project, would result in less than significant impacts with regard to consistency with the LASED Specific Plan. Furthermore, since the types of land uses, and the manner in which they are to be developed under the Revised Project would be similar to the Approved Project, the Revised Project would be consistent with the General Plan Framework's land use objectives for the Downtown Center as well as the goals and objectives of the Central Business District Redevelopment Plan, the Downtown Strategic Plan, the South Park Development Strategies and Design Guidelines and the Figueroa Corridor Economic Development Strategy by contributing to its identity as a unique place of national and international importance; by providing entertainment and visitor-serving opportunities that contribute to achieving the full economic potential of the Convention Center and maintaining the Downtown Center as the social and economic focal point of Los Angeles. The Revised Project, as is the case with the Approved Project, is consistent with the goals and policies of the Central City Community Plan by promoting the Central City as a concentrated center of high-intensity urban activities, including entertainment, residential, commercial, cultural, recreational, and appropriate industrial uses. For the reasons cited above, the Revised Project would also be consistent with the goals and policies of the LASED Specific Plan. In addition, the Revised Project would also be consistent with all of the other applicable land use plans and regulations, including the LAMC and SCAG's RCPG.

With regard to the issue of land use compatibility, the Revised Project would develop the same types of land uses as the Approved Project, though in a different mix. It is important to note that the development of office uses on the Olympic North Subarea was previously analyzed in the Final EIR and it was concluded that the Approved Project would result in a less than significant impact with regard to land use compatibility. The office uses were subsequently removed from the Olympic North Subarea in lieu of hotel and residential uses in the August 2006 Final EIR Addendum. The proposed hotel and residential uses are currently permitted on the Olympic North subarea and reflect the land use mix for this Subarea under the current LASED Specific Plan. While the LASED Specific Plan does not currently anticipate office development within the Olympic North Subarea, office uses, including broadcast/production uses, are a permitted use under the LASED Specific Plan, and are one of the land uses set forth in the LASED Specific Plan Land Use Equivalency Matrix. Thus, as is the case with the Approved Project, the Revised Project would result in less than significant impacts with regard to land use compatibility. Further, the existing land uses in proximity of the Olympic North Subarea are generally commercial and/or institutional in nature, and high rise development is an emergent development profile for

South Park area of Downtown Los Angeles. Thus, the reintroduction of high-rise office uses within the Olympic North Subarea under the Revised Project would result in land use compatibility impacts that are similar to those of the Approved Project, which were concluded to be less than significant in the Final EIR and subsequent environmental documentation.

### **3. Mitigation Measures**

No mitigation measures were identified in the Final EIR, subsequent documentation, and the adopted MMRP as the Approved Project's land use impacts were concluded to be less than significant. As the same conclusion applies to the Revised Project, no land use mitigation measures are required for the Revised Project.

### **4. Conclusion**

Implementation of the Revised Project would not introduce a new significant land use impact 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 under the Approved Project.



### **III. Environmental Impact Analysis**

---

#### **B. Aesthetics**

##### **1. Visual Quality**

###### **a. Approved Project Impacts**

The Approved Project is located within the viewshed of the Harbor and Santa Monica Freeways. As a result, buildings under the Approved Project would reduce a portion of the views to the east and north from these freeway locations. While a portion of the views from these perspectives would be obstructed, implementation of tower features within the Project Site were concluded in the Final EIR and Addendums to have a beneficial effect on the viewshed by providing a visual linkage to the downtown high-rises to the north and east, and would help to visually define the LASED area by increasing its visibility relative to the surrounding area.

The Approved Project would also be located within the viewshed of Olympic Boulevard and Figueroa Street. Approved Project development would be highly visible along these roadways in the LASED area and to some degree would shift the visual focal points in the area away from the STAPLES Center and Convention Center. The Final EIR and subsequent Addendums concluded that the Approved Project would not further obstruct views to the south (from commercial and residential properties to the north) as the STAPLES Center and Los Angeles Convention Center already obstruct 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 currently under construction within the South Park area as well as being compatible with what is allowed under existing zoning as well as the Central Business District Redevelopment Plan and Downtown Strategic Plan standards for proposed development. The Approved Project's environmental documentation has concluded that since the height and bulk of the Approved Project is compatible with existing and planned development; and the Approved Project would not remove a valued visual feature or largely obstruct a valued existing view; no significant impact on visual access from Approved Project development would occur.

During construction of the Approved Project, 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. With the implementation of the Approved Project's adopted mitigation measure, this significant impact is reduced to a less than significant level.

The Approved Project was concluded in the Final EIR and subsequent Addendums to 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. The Approved Project's prior environmental analyses have concluded that this replacement would not introduce elements that would substantially detract from the existing visual character or primary visual resources of the area and would not remove or demolish elements that contribute positively to the visual character of the area. The development that would occur within the LASED would also be consistent with the visual character of the area as envisioned in the City's plans for this area of downtown Los Angeles (i.e., the General Plan Framework, the Downtown Strategic Plan, and the South Park Development Strategies and Design Guidelines).

Existing and planned LASED structures are contemporary in architectural style and character and complement the existing STAPLES Center and Convention Center in architecture, signage, lighting, landscaping, and hardscape. Approved Project service areas, parking areas, and mechanical/equipment areas would be screened from public viewpoints.

A very important aspect of the Approved Project's streetscape design is the creation of a pedestrian-oriented environment. This is achieved via extensive landscaping and walkways that enhance the existing aesthetic quality of the area and would place the emphasis on the street and other common spaces proposed to occur throughout the LASED. The Approved Project's streetscape concept would also promote pedestrian safety and comfort and build a strong interface between buildings and sidewalks. As such, the Approved Project was concluded in the Final EIR and subsequent environmental documentation to result in a less than significant impact with regard to visual quality.

Further, the Approved Project's signage and urban design would be consistent with the South Park Development Strategies and Design Guidelines, and other applicable plans and regulations, and would be consistent with the surrounding South Park community. Furthermore, the Final EIR and subsequent Addendums concluded that the Approved Project's proposed use of signage, graphics and lighting serve to define the Approved Project as a distinctive place, emphasizing exciting and innovative expressions that would be consistent with the South Park Development Strategies and Design Guidelines recommendations to establish a sense of place and reflect the unique identity of the

STAPLES Center/Convention Center area. While the Final 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 as part of the Approved Project in relation to existing conditions.

## **b. Revised Project Impacts**

Visual quality impacts during construction of the Approved Project result from the temporary creation of construction sites (e.g., the placement of graffiti on construction barriers, etc.). As the types of land uses and quality of development would not change from that anticipated under the Approved Project, the types of construction activities that would occur under the Revised Project relative to these issues would also be the same. 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 (e.g., security patrols, graffiti removal, prohibiting unauthorized posters on construction barriers, etc.) would reduce the Revised Project's impacts to less than significant levels, regardless of the duration of Revised Project construction.

The primary element of the Revised Project that has the potential to affect visual access issues is increasing the maximum permitted tower height permitted on the Olympic North Subarea from 200 feet above grade to 350 feet above grade (an increase of 150 feet). Other elements of the Revised Project that also affect visual access, albeit to a much lesser degree, is increasing the size and amount of permitted development within the Olympic North Subarea. No changes in maximum permitted tower height or building size are proposed in the remainder of the LASED area, although the maximum allowable development in certain Subareas will be reduced to accommodate the increased development on the Olympic North Subarea.

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 with 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. With respect to visual quality, the Approved Project provided for the construction of high-rise hotel and residential uses on the Olympic North Subarea. The Final EIR also considered the construction of office uses on the Olympic North Subarea. 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 the buildings would be anticipated to be relatively similar in appearance and be consistent with the overall mixed-use theme of the LASED. As mentioned above, the primary element of the Revised Project that affects visual quality issues is increasing the tower height permitted on the Olympic North Subarea. Other elements of the Revised Project that also affect visual quality, albeit to a much lesser degree, are increasing the size and amount of permitted development within the Olympic North Subarea. 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 the Olympic North Subarea. Towers are one of the elements that define the visual character of the LASED. Further, as with the Approved Project, the Revised Project would not introduce elements that would substantially detract from the existing visual character or primary visual resources of the area and would not remove or demolish elements that contribute positively to the visual character of the area. As such, 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 in the area, as high-rise structures are common in the downtown Los Angeles area.

Furthermore, 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, signage, lighting, landscape, and hardscape, and would be consistent with the Design Guidelines in the LASED Specific Plan. The area surrounding the LASED is composed of development of varying age and density, from aging single-story office buildings to modern high-rise towers of downtown and the LASED. The aging buildings are generally of brick and mortar construction, with ornate street frontage decorations, while the more modern buildings are generally larger, contemporary in design, and constructed of modern materials, including glass and stucco walls. In general, these newer buildings are representative of the development trends occurring within the LASED. As the type and density of development in the vicinity of the LASED area varies quite a bit, there is generally a lack of visual

cohesiveness in the area's development. The exception is the development that is occurring within the LASED, anchored by the STAPLES Center and the Convention Center. This new development is largely cohesive through its use of contemporary design and materials, as well as through similar bulk, massing, architectural ornamentation, lighting, and signage. The majority of undeveloped parcels in the vicinity of the LASED are occupied by surface parking lots. As mentioned above, the design of the Revised Project would complement the LASED, Staples Center, and Los Angeles Convention Center. 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. Additionally, similar to the Approved Project, the Revised Project would replace a surface parking lot and older single story office building with a contemporary building. Further, as mentioned above, by constructing the revised Project north of the existing STAPLES Center and Convention Center, the Revised Project would help create a visual linkage to the high-rise structures downtown that are located to the north and east of the LASED and would help to define the LASED as a 24-hour mixed-use destination. 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 result in an incremental increase in the amount of signage proposed for the Olympic North Subarea, but would not increase the total amount, size, type, or placement of signage previously approved for the LASED Specific Plan. As with the Approved Project, signage under the Revised Project would be consistent with the South Park Development Strategies and Design Guidelines and the LASED Specific Plan. Further, as with the Approved Project, the signage in the LASED area would further enhance the sense of place and contribute to the creation of a major outdoor "gathering place", resulting in a beneficial impact with regard to signage. Compliance with the LASED Specific Plan sign standards would ensure that the proposed signage would be consistent with the LASED Specific Plan signage, further establishing the district as a vibrant and exciting mixed use district. Additionally, the majority of the proposed signage would face onto Olympic Boulevard, away from surrounding sensitive uses. Thus, as the incremental increase in signage proposed for the Olympic North Subarea would not require an increase to the total amount, size, type, or placement of signage over that previously permitted in the LASED Specific Plan area, and would continue to be consistent with applicable land use planning documents, signage under the Revised Project would not increase the significant impact identified under the Approved Project.

### **c. Mitigation Measures**

The Mitigation Measure that is identified in the Final EIR, Addendums, and the adopted MMRP to address visual impacts during construction (Mitigation Measure IV.B.1-1)

would also apply to the Revised Project. No additional mitigation measures are required due to the development of the Revised Project.

#### **d. Conclusion**

Overall, the Revised Project would not introduce new significant impacts or substantially increase the severity of previously identified significant impacts regarding visual quality. Thus, the environmental implications of the Revised Project would be consistent with those analyzed in the Final EIR and subsequent Addendums.

## **2. Light and Glare**

### **a. Approved Project Impacts**

The Approved Project would increase the amount of ambient light within the LASED area and surrounding area, as compared to existing conditions due to the introduction of multiple new buildings, some of which would be high-rise structures as well as signage. This was concluded to result in a less than significant impact to daytime conditions. Nevertheless, 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 from 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.

### **b. 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.

With the exception of the Olympic North Subarea, the Revised Project would not increase tower heights or alter building designs in the LASED in comparison to what was proposed under the Approved Project. Thus, the Revised Project would not result in an increase in ambient lighting in the remainder of the LASED. Similar to the Approved Project, the Revised Project would convert the Olympic North Subarea from a surface

parking and single-story office building lot into high-rise towers. The existing surface parking lot generates a minimal amount of light and glare, primarily as a result of vehicle headlights and parking lot lights. As with the Approved Project, the conversion of this subarea into towers would increase the overall ambient light generated on the subarea as a result of the increase in pedestrian-level lighting, signage, and interior lighting radiating through windows. Nonetheless, 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. In this regard, 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 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. As such, with regards to the remainder of the LASED, the Revised Project would not increase nighttime lighting over what was envisioned under the Approved Project. Similar to the Approved Project, the Revised Project would convert the Olympic North Subarea from a surface parking lot to high-rise tower development, thus resulting in an increase in the amount of nighttime light occurring within the Olympic North Subarea. As the Revised Project would increase the height, size, and mass of development within the Olympic North Subarea over the Approved Project, the overall level of illumination on the Olympic North Subarea may be increased, primarily as a result of additional perimeter pedestrian-level lighting (i.e., due to the increase in the size of the Olympic North Subarea) and an increase in the amount of interior lighting radiating through windows (i.e., due to taller structures under the Revised Project). However, 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 office 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 noted above, the Revised Project would result in an incremental increase in the proposed signage within the Olympic North Subarea over what was envisioned under the Approved Project. Nonetheless, this incremental increase in signage would not increase the overall type, placement, and amount of signage previously permitted within the LASED Specific Plan area and the LASED area as a whole. As such, the Revised Project would be consistent with applicable land use policies, including those set forth in the South Park Development Strategies and Design Guidelines and the LASED Specific Plan, including

design standards intended to shield illumination from adjacent areas. As a result, although the Revised Project may increase nighttime levels over the Approved Project, this increase would be incremental when compared to the increase from the Approved Project and would not result in a substantial increase in nighttime illumination over conditions that would exist under the Approved Project. As such, the Revised Project's nighttime illumination 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. Similar to the Approved Project, any glass or reflective surface to be used on the building façades within the Olympic North Subarea would either have low-reflectivity, would be treated with a non-glare coating, or would be screened to prevent off-site glare impacts. Additionally, as with the proposed Project, vehicle headlights would largely be screened from view as parking would be subterranean. In addition, the Approved Project's lighting standards that require that lighting not create glare on nearby roadways, freeways, residences, and other sensitive uses would also apply to the Revised Project. Thus, as with the Approved Project, the Revised Project would result in a less than significant impact with regard to glare. Further, glare impacts under the Revised Project would be similar to those of the Approved Project.

### **c. Mitigation Measures**

The Mitigation Measures that are identified in the Final EIR, Addendums, subsequent documentation, and the adopted MMRP requiring the Applicant to prepare a lighting plan and implement design features to reduce light and glare impacts (Mitigation Measures IV.B.2-1 and IV.B.2-2) would also apply to the Revised Project. No additional mitigation measures are required due to the development of the Revised Project.

### **d. Conclusion**

Overall, the Revised Project would not introduce new significant impacts or substantially increase the severity of previously identified significant impacts regarding light and glare. Thus, the environmental implications of the Revised Project would be consistent with those analyzed under the Approved Project.

## **3. Shade and Shadow**

### **a. Approved Project Impacts**

Shadow-sensitive uses identified in proximity of the LASED consists of the Convention Center's Gilbert Lindsay Plaza; the Convention Center West Hall entry pavilion, lobby and concourse; the Holiday Inn Hotel; the Figueroa Hotel; the first United Methodist



Church; California Hospital Medical Center; and a number of motels and apartment buildings located primarily along Hope and Flower Streets south of Pico Boulevard, and between Olympic Boulevard and 9th Street.

No off-site shadow sensitive uses were concluded to be significantly impacted by the Approved Project during the summer. Development to the maximum heights permitted under the Approved Project, as concluded in the Final EIR and subsequent environmental documentation would result in significant shading impacts (i.e., shading longer than three hours between 9:00 A.M. and 3:00 P.M.) to five off-site shadow-sensitive uses during the winter. Of note is that two multi-family residential structures (located at the southeast corner of 9th Street and Georgia Street) would be shaded for more than three hours by development proposed within the Olympic North Subarea, resulting in a significant shading impact. Additional significant winter shading impacts in the LASED area were identified at the two Salvation Army Buildings along Olympic Boulevard in the vicinity of Francisco Street and at the Gilbert Lindsay Plaza, as a result of development on the Figueroa North and Olympic East Subareas, respectively. These impacts would be reduced with implementation of the Project design guidelines and mitigation measures related to shade (e.g., reducing the height of Approved Project structures, setting the maximum height portion of the Project structures away from the shade-sensitive uses, or stepping back the roofs for the Olympic East, Olympic North, and Figueroa South Properties). However, it was determined that while the result of these actions would be to reduce, where feasible, anticipated shading of shade-sensitive uses, 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.

## **b. 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 in comparison to what was proposed under the Approved Project. As such, with regards to the remainder of the LASED area, the Revised Project would not increase shade impacts over the Approved Project. The Revised Project would increase the maximum building height occurring within the Olympic North Subarea, and thus would alter shadow patterns generated by development within this Subarea. Specifically, the maximum tower height of 200 feet above grade would be increased to 350 feet above grade, exclusive of rooftop elements. In addition, the footprint of the proposed towers would be expanded beyond what was proposed under the Approved Project. All other height regulations within the LASED would remain unchanged.

As shown in Figures 6 and 7 on pages 45 and 46, 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

Revised Project



9:00 AM



9:00 AM



11:00 AM



11:00 AM



1:00 PM



1:00 PM



3:00 PM



3:00 PM

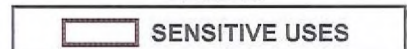


5:00 PM



5:00 PM

LEGEND



Approved Project

Revised Project



9:00 AM



9:00 AM



11:00 AM



11:00 AM



1:00 PM



1:00 PM

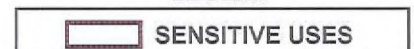


3:00 PM



3:00 PM

LEGEND



Approved Project. During the morning hours in the summer (approximately 9:00 A.M. to 12:00 P.M.), development within the Subarea would shade a small portion of the Olympic West Subarea and commercial uses on the east side of Georgia Street. During the early afternoon hours in the summer (approximately 12:00 P.M. to 3:00 P.M.), development on the Subarea would shade the two multi-story residential buildings and the Salvation Army building north of the Subarea. During the late afternoon in the summer (approximately 3:00 P.M. to 5:00 P.M.), development within the Olympic North Subarea would continue to shade the two residential buildings north of the Subarea, as well as the Salvation Army building at the southeast corner of James Woods Boulevard and Francisco Street, the Los Angeles Department of Power and Water building, and surface parking lots east of Francisco Street. As such, the shadow lengths would increase to a degree that additional shade-sensitive uses would be shaded over those uses identified under the Approved Project. Under the Approved Project, no shade-sensitive uses would be shaded for more than four hours between 9:00 A.M. and 5:00 P.M. between early April and late October (summer). Under the Revised Project, the two multi-family residential buildings north of the Subarea would be shaded for more than four hours from approximately 12:00 P.M. to sometime after 5:00 P.M. 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. As such, the buildings would not be occupied at the time of the completion of construction on the Olympic North Subarea and thus is not considered a shade shadow sensitive land use for the purposes of this analysis. As such, shading impacts during the summer would be less than significant, as is the case with the Approved Project.

Shadow lengths would be incrementally increased during the winter as well, although to a greater extent than during the summer months. Winter shadows would largely follow the pattern of the summer shadows, resulting in shading on 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 through the late afternoon time period. Unlike during the summer, sensitive uses east of the Project Site would not be shaded during the winter as a result of the sun angle and the earlier time at which the sun sets during the winter months. As with the Approved Project, the proposed towers on the Olympic North Subarea under the Revised Project would primarily result in shade impacts to the two three-story, multi-family residential structures north of the subarea, located at the southeast corner of 9th Street and Georgia Street. As mentioned above in the discussion of summer shade/shadow impacts, this analysis is conservative in that it assumes that the entire Olympic North Subarea to the property line would be developed to a height of 350 feet, which would not be the case. The proposed towers would occupy only approximately 39 percent of the subarea and would include design features to minimize shade impacts, including roof forms and required setbacks. Additionally, as further mentioned above, the owner has been issued a court order to vacate these residential buildings due to sub-standard living conditions. As such, the

buildings would not be occupied at the time of the completion of construction on the Olympic North Subarea and thus is not considered a shade shadow sensitive land use for the purposes of this analysis. As such, Revised Project shading impacts during the winter would not substantially worsen a previously identified significant impact.

No other sensitive uses would be shaded by the Revised Project's two proposed towers. Under the Revised Project, all other portions of the LASSED would be developed to the same heights as the Approved Project. Thus, as is the case with the Approved Project, the Revised Project could result in a significant shading impact as a result of development throughout the LASSED since implementation of the mitigation measure set forth in the Final EIR and Addendums may not necessarily reduce all shading impacts to less than significant. However, with regards to the increased tower height on the Olympic North Subarea, while changes in the shadow patterns would occur under the Revised Project, the proposed height for the Olympic North Subarea would not shade any sensitive uses such that a new significant impact would occur or a substantial worsening of a previously identified significant impact.

### **c. Mitigation Measures**

The Mitigation Measure that is identified in the Final EIR, Addendums, and the adopted MMRP to reduce shade impacts through a reduction in building height and building design features (Mitigation Measure IV.B.3-1) would also apply to the Revised Project. No additional mitigation measures are required due to the development of the Revised Project.

### **d. Conclusion**

Overall, the Revised Project would not introduce new significant impacts or substantially increase the severity of previously identified significant impacts regarding shade and shadow. Thus, the environmental implications of the Revised Project would be consistent with those analyzed under the Approved Project.

### **III. Environmental Impact Analysis**

---

#### **C. Population, Housing, and Employment**

##### **1. Approved Project Impacts**

The Approved Project's 2,101 residential units (1,833 units within the Specific Plan area and 268 units on the Figueroa North Properties) would generate approximately 5,966 residents.<sup>4</sup> The Approved Project's residential population would represent approximately 71.2 percent of the anticipated population growth (8,383 persons) between 2000 and 2010 for the Central City Community Plan Area. In addition, the Approved Project's residential population would represent 1.3 percent of the growth forecasted (453,629 persons) for the City of Los Angeles subregion between 2000 and 2010.<sup>5</sup>

Additionally, the Approved Project's 2,101 residential units would represent approximately 66.3 percent of the forecasted housing growth between 2000 and 2010 in the Central City Community (3,168 units), and approximately 1.3 percent of the growth anticipated for the City of Los Angeles subregion (162,836 units). As such, population and housing growth due to the Approved Project would be within the growth projected for the Central City Community Plan area and the City of Los Angeles subregion.

The Approved Project would constitute a notable proportion of the population and housing growth projected for the Community Plan area. However, the Approved Project's 2,101 residential units would further the policies of the City and SCAG. In particular, it would support development of the downtown area as a mixed-use area and major center consistent with Policies 1-1.1 and 1-2.1 of the Central City Community Plan; it would support the downtown area as a balanced around-the-clock urban environment consistent with Objective 2-4; and it would promote the creation of additional residential units in the South Park area consistent with Objective 1-1. Further, this housing supports the overall effort of SCAG to establish a better balance between the distribution of housing and employment. The Downtown area is currently a jobs rich area, in which housing is not

---

<sup>4</sup> Based upon the average household size as identified in the Final EIR of 2.84 persons per household within a one-mile radius of the Project site.

<sup>5</sup> Based on a Central City 2000 to 2010 population growth of 8,383 persons and City of Los Angeles subregion population growth between 2000 and 2010 of 453,629 persons.

sufficient to support the employee base. Thus, most employees must live outside of the area necessitating longer drives to work, causing adverse effects on transportation, air quality and noise. SCAG policies, including Policies 3-04, 3-11, and 3-24, aim to increase the relative amount of housing in job rich areas. Thus, the Approved Project would be consistent with regional and local growth policies.

With regard to employment, approximately 4,296 workers would be employed during the construction of the Approved Project.<sup>6</sup> However, it was concluded that these workers do not typically relocate closer to the construction site as the length of time spent at a specific job is limited. Therefore, housing and population impacts related to construction workers would be less than significant.

During operation, it was determined that the Approved Project would assist in the economic revitalization of the Central City area by generating approximately 5,343 jobs in the LASED area as shown in Table 2 on page 5 which is approximately 82.1 percent of the projected overall employment increase for this area from 2000 to 2010 (6,506 jobs). While constituting a large majority of the forecasted growth, this level of employment growth would be a favorable impact on employment, and as such represents a less than significant impact. In addition, it was found that the Approved Project would contribute to improving the jobs-to-housing ratio within the Central City Community Plan area.

Development of the Approved Project would be consistent with the policy initiatives included within the various planning documents, which oversee housing and economic development within this area of the City (i.e., the Central City Community Plan, South Park Design Guidelines and SCAG's Regional Comprehensive Plan and Guide). Thus, the population, housing, and employment impacts were determined to be less than significant with the Approved Project.

## 2. Revised Project Impacts

As shown in Table 4, the Revised Project would develop a total of 2,065 residential units in the LASED area (65 units on the Olympic North Subarea), 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,<sup>7</sup> which is a decrease of 102 residents when

---

<sup>6</sup> *The Final EIR, which analyzed a total development of 4.0 million square feet within the LASED, concluded that 4,296 construction jobs would be generated. While the Approved Project increased development to 5,977,806 square feet within the LASED area, the subsequent documentation for this additional development conservatively retained the EIR's forecast of construction jobs. The same approach is used for the Revised Project.*

<sup>7</sup> *Based on the Draft EIR's population assumption of 2.84 persons per dwelling unit.*

**Table 4**  
**Estimated Population Generation under Approved Project and Revised Project**

<b>Development Site</b>	<b>Residential Units</b>	<b>Generation Rate (Persons/DU)<sup>a</sup></b>	<b>Total Population (persons)</b>
<b>LASED under Approved Project</b>			
2	225 du	2.84	639
7,8, and 9	860 du	2.84	2,442
10 and 11	648 du	2.84	1,840
12	100 du	2.84	284
<i>Subtotal LASED Specific Plan Area</i>	<i>1,833 du</i>	-	<i>5,205</i>
Figueroa North	268 du	2.84	761
<i>Subtotal LASED under Approved Project</i>	<i>2,101 du</i>	-	<i>5,966</i>
<b>LASED under Revised Project</b>			
2	224 du	2.84	636
7,8, and 9	860 du	2.84	2,442
10 and 11	648 du	2.84	1,840
12	65 du	2.84	185
<i>Subtotal LASED Specific Plan Area</i>	<i>1,797 du</i>	-	<i>5,103</i>
Figueroa North	268 du	2.84	761
<i>Subtotal LASED under Revised Project</i>	<i>2,065 du</i>	-	<i>5,864</i>
<b>Net Change Revised Project</b>	<b>-36 du</b>		<b>-102 persons</b>

Notes: du = dwelling unit; sf = square feet

<sup>a</sup> The LASED Final EIR, May 2001, identified the average household size within a one-mile radius of the LASED as 2.84 persons per unit.

Source: Matrix Environmental, June 2009.

compared to the Approved Project. The residential population associated with the Revised Project would represent approximately 70 percent of the population growth projected for the Central City Community Plan Area between 2000 and 2010 and approximately 1.3 percent of the growth for the City of Los Angeles subregion between 2000 and 2010.<sup>8</sup> Additionally, the Revised Project's housing supply would represent approximately 65.2 percent of the housing growth projected for the Central City Community Plan Area between 2000 and 2010 and approximately 1.3 percent of the housing growth projected for the City of Los Angeles Subregion.

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. The

<sup>8</sup> Based on a Central City Community Plan Area 2000 to 2010 population growth of 8,383 persons and City of Los Angeles subregion population growth between 2000 and 2010 of 453,629 persons.



Revised Project, which would reduce the residential development within the LASED, would facilitate the achievement of current local and regional policies to provide housing in the downtown area and to address the job/housing balance. Thus, the Revised Project would result in beneficial population/housing impacts, which would result in less than significant impact. Furthermore, the Revised Project would not cause a substantial alteration in the location, distribution, density, or growth rate of population and housing anticipated for the area and would not conflict with the basic goals and expectations set forth in the City's or SCAG's plans. Thus, population/housing impacts associated with the Revised Project would be less than those significant and less than those of the Approved Project due to the relative reduction in housing under the Revised Project.

As shown in Table 5 on page 53, the Revised Project's proposed development is conservatively estimated to generate approximately 7,071 jobs, which is an increase of 1,715 jobs from the Approved Project. As a result, the Revised Project would exceed the employment projections for the Central City area. Nevertheless, increased employment opportunities are generally 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. Thus, the Revised Project's increase in employment would not result in a significant impact. 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. In addition, the Revised Project would support the policies of the City and SCAG with regard to improving the jobs-housing ratio in the downtown area (e.g., City General Plan Framework Objectives 3.1, 3.2 and 3.4; as well as SCAG Growth Management Chapter Policy 3.04 and Principle 1 of SCAG's Compass Growth Visioning). Furthermore, the Revised Project would not cause a substantial alteration in the location, distribution, density or growth rate of employment for the area and would not conflict with the basic goals or expectation set forth in the City's or SCAG's plans. 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. Thus, as with the Approved Project, population, housing and employment impacts associated with the Revised Project would be less than significant.

The preceding analysis addresses those aspects of the proposed Specific Plan amendments that have the potential to result in population, housing and employment impacts (i.e., increasing the maximum square footage permitted within the LASED Specific Plan area; as well as changes to the type, and amounts and allocation of land uses across the individual Development Sites that comprise the LASED Specific Plan area). The balance of the proposed Specific Plan amendments analyzed in this Addendum would have no impact upon population, housing and employment issues (i.e., increasing the size of the Olympic North Subarea; and changing the maximum height and location of the

**Table 5**  
**Estimated Employment Generation under Approved Project and Revised Project**

<b>Uses</b>	<b>Development</b>	<b>Employee Generation Rate (SF/Employee)<sup>a</sup></b>	<b>Total Employment (persons)</b>
<b>LASED under Approved Project</b>			
Convention Center	250,000	500	500
Cinema	127,327	486 <sup>b</sup>	262
Hotel/Ballroom	1,622,902	909	1,785
Office	245,800	292	842
Retail/Entertainment/Restaurant	789,486	486 <sup>b</sup>	1,624
<i>Subtotal LASED Specific Plan Area</i>	<i>3,035,515</i>	<i>-</i>	<i>5,013</i>
Figueroa North (Office)	95,706	292	328
Figueroa North (Retail/Entertainment/Restaurant)	7,499	486 <sup>b</sup>	15
<i>Subtotal LASED (non-residential) under Approved Project</i>	<i>3,138,720</i>	<i>-</i>	<i>5,356</i>
<b>LASED under Revised Project</b>			
Convention Center	250,000	500	500
Cinema	127,327	486 <sup>b</sup>	262
Hotel/Ballroom	1,389,106	909	1,528
Office	581,100	292	1,990
Entertainment Studio/Production	266,500	323 <sup>c</sup>	824
Retail/Entertainment/Restaurant	789,486	486 <sup>b</sup>	1,624
<i>Subtotal LASED Specific Plan Area</i>	<i>3,403,519</i>	<i>-</i>	<i>6,728</i>
Figueroa North (Office)	95,706	292	328
Figueroa North (Retail/Entertainment/Restaurant)	7,499	486 <sup>b</sup>	15
<i>Subtotal LASED (non-residential) under Revised Project</i>	<i>3,506,724</i>	<i>-</i>	<i>7,071</i>
<b>Net Change Revised Project</b>	<b>+368,004</b>		<b>+1,715</b>

Notes: du = dwelling unit; sf = square feet

<sup>a</sup> Generation factors provided in the LASED Final EIR, May 2001.

<sup>b</sup> Generation factor derived from weighted average of the retail, entertainment, and restaurant factors.

<sup>c</sup> Generation factor derived from the October 1996 Universal City Final Draft EIR.

Source: Matrix Environmental, June 2009.

tower(s) within the Olympic North Subarea). As such, no further analysis of these Specific Plan amendments is required.

### 3. Mitigation Measures

No mitigation measures were identified in the Final EIR, Addendums, and the adopted MMRP as the Approved Project's population, housing and employment impacts were concluded to be less than significant. As the same conclusion applies to the Revised Project, no mitigation measures relative to population, housing and employment are required for the Revised Project.

## 4. Conclusion

Overall, the Revised Project would not introduce new significant impacts or substantially increase the severity of previously identified significant impacts with regard to population, housing, and employment. Thus, the environmental implications of the Revised Project would be consistent with those analyzed under the Approved Project.

### **III. Environmental Impact Analysis**

---

#### **D. Drainage and Surface Water Quality**

##### **1. Approved Project Impacts**

###### **a. Drainage**

It was determined that construction of the Approved Project would not result in a significant change to existing hydrologic conditions. Furthermore, the Approved Project would be designed to ensure that hydrologic conditions before and after development would remain unchanged and that no increase in runoff over existing conditions would occur during construction. Thus, a less than significant drainage impact would occur during construction of the Approved Project.

Operation of the Approved Project would also not result in a significant change to existing hydrologic conditions. As noted above, the Approved Project would be designed to ensure that hydrologic conditions before and after development would remain unchanged. Furthermore, as the LASED site is fully paved, the Approved Project would actually have a beneficial impact on runoff by increasing the amount of pervious areas through landscaping. Thus, a less than significant drainage impact would occur during operation of the Approved Project.

###### **b. Surface Water Quality**

It was found that while construction of the Approved Project would temporarily increase sediment loading in surface water, the Approved Project would be required to implement Best Management Practices ("BMPs") as set forth by the County's National Pollutant Discharge Elimination System ("NPDES") permit. With implementation of BMPs and compliance with all relevant storm water quality management programs, the Approved Project would result in less than significant impacts to surface water quality during construction.

During operation, the Approved Project would also increase the amount of contaminants in stormwater runoff as a result of the proposed land uses and increase in automobile traffic. However, as stated in the Final EIR and Addendums, the Approved Project would be required to select source control and treatment control BMPs from the list

approved by the Regional Water Quality Board. With implementation of these BMPs, the Approved Project would not violate any water quality standards or waste discharge requirements, nor would the Project impair the beneficial uses of receiving waters. Furthermore, by replacing the existing surface parking lots with urban land uses, the quantity of urban contaminants in relation to existing Project uses would be reduced; this is a beneficial effect. As a result, less than significant impacts to surface water quality during Approved Project operations would occur.

## 2. 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, 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 stormwater runoff would be similar, and thus, drainage impacts for the Revised Project would be the same as those under existing conditions. Furthermore, since the rate and amount of stormwater runoff would not increase over existing conditions under the Revised Project, the local storm drain infrastructure would be adequate to accommodate the increased residential and commercial uses since no capacity constraints are known to presently exist. In addition, no changes to the physical design of the local storm drain system are proposed, and as a result drainage patterns under the Revised Project would be the same as that of the Approved Project. 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, even though the site area of the LASED increases under the Revised Project, surface water quality impacts during construction would be less than significant. Under the Revised Project, the amount of impervious and pervious areas on an areawide basis would remain the same under current conditions. Moreover, development in 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. Thus, the Revised Project would not create any new impacts with respect to drainage and surface water quality nor increase the severity of any previously identified impacts. Therefore, as is the case with the Approved Project, the Revised Project would result in less than significant impacts to surface water quality.

### **3. Mitigation Measures**

The Mitigation Measures that are identified in the Final EIR, Addendums, and the adopted MMRP to reduce the potential for an increased flood hazard and to ensure no significant impacts to surface water quality (Mitigation Measures IV.D-1 and IV.D-2) would also apply to the Revised Project. No additional mitigation measures are required due to the development of the Revised Project.

### **4. Conclusion**

Overall, the Revised Project would not introduce new significant impacts or substantially increase the severity of previously identified significant impacts with regard to drainage and surface water quality. Thus, the environmental impacts of the Revised Project would be consistent with those of the Approved Project

### **III. Environmental Impact Analysis**

---

#### **E. Air Quality**

##### **1. Approved Project Impacts**

###### **a. Construction**

It was determined that construction of the Approved Project would generate particulate matter less than 10 microns in diameter (PM<sub>10</sub>) pollutant emissions from the following activities: (1) site preparation (grading/excavation); (2) travel by construction workers to and from the site; (3) delivery and hauling of construction materials and supplies to and from the site; (4) fuel combustion by on-site construction equipment; and (5) the application of architectural coatings and other building materials that release reactive organic compounds. Based on the phase of construction and other worst-case assumptions, daily construction emissions from the Approved Project would exceed the South Coast Air Quality Management District's (SCAQMD) significance thresholds for carbon monoxide (CO), reactive organic compounds (ROC), nitrogen oxides (NOx), and daily PM<sub>10</sub>. The Approved Project would not exceed the SCAQMD's significance thresholds for quarterly PM<sub>10</sub> or sulfur oxides (SOx) during construction. Mitigation measures would reduce these impacts, but not to a less than significant level. As such, it was concluded that the Approved Project would result in significant and unavoidable impacts on regional air quality during construction. With regard to localized construction impacts, the Approved Project was forecasted to have a maximum PM<sub>10</sub> concentration increase of 1.95 µg/m<sup>3</sup> at the corner of Francisco Street and Olympic Boulevard. In comparison to the 2.5 µg/m<sup>3</sup> PM<sub>10</sub> significance threshold, it was concluded that the Approved Project would result in a less than significant localized PM<sub>10</sub> impact on all sensitive receptors including, but not limited to, nearby residential receptors as well as the Tenth Street and Norwood Street Schools.

###### **b. Operation**

During operation of the Approved Project, traffic and other pollutant sources (e.g., consumption of energy) would result in regional emissions of NOx, CO, ROC, and PM<sub>10</sub> that would exceed SCAQMD regional significance thresholds. Therefore, it was concluded that operation of the Approved Project would result in a significant and unavoidable impact on regional air quality. Sensitive receptors in the area would not be significantly affected by

localized CO emissions generated by traffic attributable to the Approved Project. Therefore, localized air quality impacts related to mobile source emissions were concluded to be less than significant. In addition, it was concluded that the Approved Project would be consistent with applicable SCAQMD and SCAG air quality policies.

### c. Greenhouse Gas (GHG) Emissions

When the Final EIR was prepared, there were no regulatory requirements to analyze impacts to global climate. However, regulations have evolved in recent years. In response to growing scientific and political concern regarding global climate change, California has recently adopted a series of laws to reduce both the level of GHGs in the atmosphere and to reduce emissions of GHGs from commercial and private activities within the State. At this time there is no formal guidance under CEQA and no available quantitative standards by which the approval of a project can be judged to support or hinder attainment of the State's goals relating to GHG abatement.

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 commits the State to the following:

- 2000 GHG emission levels by 2010 (which represents an approximately 11 percent reduction from emissions projections if current GHG production rates are not altered, or so called "business as usual");
- 1990 levels by 2020 (25 percent below "business as usual"); and
- 80 percent below 1990 levels by 2050.

To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce Statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

Recently, the City of Los Angeles published the "*Green LA, an Action Plan to Lead the Nation in Fighting Global Warming*" (*LA Green Plan*), outlining the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. According to the *LA Green Plan*, the City of Los Angeles is committed to the goal of reducing emissions of CO<sub>2</sub> to 35 percent below 1990 levels.



As of this date, neither the SCAQMD nor the City of Los Angeles have yet established significance thresholds for GHG emissions related to land use development projects (e.g., residential/commercial).<sup>9</sup> Thus, the regulations required to meet the State goals under AB 32 are still under development. In the absence of specific regulatory guidance, the City concludes that if a project implements strategies consistent with the goals of AB 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 largest project-related source of GHG emissions is from mobile sources. Mobile source GHG emissions are directly dependent on the number of vehicle trips. Thus, a decrease in the number of Project generated trips as a result of implementation of project features and mitigation measures would provide a proportional reduction in mobile source GHG emissions. The SCAQMD recommended URBEMIS model provides for vehicular trip reducing measures and includes a range of reduction for different measures (e.g., sidewalks, bike paths, etc.).

The Approved Project promotes reductions in vehicle trips and the consequent generation of GHG emissions in the following ways: (a) by providing a mix of uses including commercial office, retail, restaurant, hotel, and residential uses; (b) by providing improved opportunities for the use of public transit, including bus and rail, and other alternative transportation modes; (c) by encouraging pedestrian and bicycle circulation through a well established sidewalk system in the project vicinity; and (d) by providing on-site recreation and open space amenities.

The following design features and mitigation measures result in a reduction in GHG emissions and were proposed as part of the Approved Project:

- The Approved Project integrates a variety of mutually supportive land uses, such as employment, housing, and life style amenities as well as restaurant, retail, and

---

<sup>9</sup> On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where the SCAQMD is lead agency. However, SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds. More information on this Working Group is available at <http://www.aqmd.gov/ceqa/handbook/GHG/GHG.html> (last visited June 16, 2009).

hotel uses, that will make efficient use of land and infrastructure, and reduce employee, resident, and visitor trips and trip distance. As an example, the average trip distance for retail would be substantially reduced as approximately 20 to 30 percent of the trips would be considered pass-by trips, depending on the particular retail use. (Final EIR, at 246)

- The Approved Project mix of land uses (commercial office, retail, hotel and residential uses) could help achieve an ideal housing/employment balance within the Project area which could result in a daily trip reduction of up to nine percent. (SCAQMD, at 37)<sup>10</sup>
- The Approved Project is located within a transit rich area with close access to nearby bus and rail lines (e.g., Metro Blue Line). It would also include conveniently placed bus stops with safe and efficient access from building entrances, and amenities at bus stops (such as seating and route/schedule information). The Approved Project is located in close proximity to local transit with over 900 daily light rail and buses stopping within ½ mile of the center of the Project site. The close proximity to local transit could result in a daily trip reduction of up to 15 percent. (SCAQMD, at 39)
- The Approved Project includes local serving retail uses; in addition, there are existing retail uses within ½ mile of the center of the Project site, all of which could result in a daily trip reduction of up to two percent. (SCAQMD, at 38)
- Bike and Pedestrian (non-motorized access to transit) —The Approved Project is located in close proximity to an extensive pedestrian system (i.e., sidewalks and crosswalks) and includes sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building. The extensive non-motorized access to transit could result in a daily trip reduction of up to nine percent. (SCAQMD, at 38)
- Mitigation Measure IV.E-17 requires the Applicant to implement transportation systems management and demand management measures and comply with SCAQMD Rule 2202, which applies to all employers who employ 250 or more persons on a full or part-time basis at a single worksite. This rule provides employers a menu of options that they can choose from to reduce emissions related to employee commutes.

---

<sup>10</sup> *South Coast Air Quality Management District and Jones & Stokes Associates, URBEMIS 2007 for Windows Users' Guide, Version 9.2, Appendix D (URBEMIS 2007 Mobile Source Mitigation Component). November 2007.*

- Mitigation Measure IV.F-13 requires the Applicant to initiate and maintain a Transportation Demand Management (TDM) Program, discussed below in Section IV. F, which may include but not be limited to the following measures: (1) centralized information board on alternative transportation modes; (2) rideshare coordination services; (3) preferential loading and unloading areas for high-occupancy vehicles (HOV); (4) parking management for employee carpool/vanpool parking; (5) bicycle facilities for employees and visitors; (6) conveniently located public transit stops with shelters, benches, schedule and route information; and (7) on-site transit pass sales. A TDM program that implements five of these elements could result in a daily trip reduction of up to five percent depending on the level of transit and pedestrian/bike friendliness in the area. (SCAQMD, at 44)

In June 2005, Governor Schwarzenegger signed Executive Order S-3-05, which established GHG emissions targets for the State, as well as a process to ensure the targets are met. As a result of this executive order, the California Climate Action Team (CAT), led by the Secretary of the California EPA, was formed. The CAT published its report in March 2006, in which it laid out several recommendations and strategies for reducing GHG emissions and reaching the targets established in the executive order.<sup>11</sup> Table 6 on page 63 illustrates the project's consistency with those recommendations and strategies presented in the CAT report and provides project features or mitigation measures that apply directly to the CAT strategies for reducing GHG emissions.

While it is not possible at this time to quantify the exact amount of greenhouse gas emissions reduction anticipated, the Approved Project would be consistent 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.

---

<sup>11</sup> *California Climate Action Team. Climate Action Team Report to Governor Schwarzenegger and the Legislature, 2006.*

**Table 6  
Consistency with Applicable California Climate Action Team Report Strategies  
(Approved Project)**

Strategies for Reducing GHG Emissions	Project Consistency
<p><b>Diesel Anti-Idling</b></p> <p>Reduce diesel-fueled commercial motor vehicle idling.</p>	<p>While not specific to diesel idling, the following mitigation measures serve to reduce diesel exhaust emissions. MM IV.E-8 stipulates that diesel fueled onsite generators shall not be used during construction of the Approved Project. MM IV.E-14 requires the Applicant to use low emission vehicles to the extent technologically and economically feasible. This may include vehicles using alternative fuels, low sulfur diesel, diesel engines with particulate traps, methanol, or electricity.</p>
<p><b>Achieve 50% Statewide Recycling Goal</b></p> <p>Achieve California's 50 percent waste diversion mandate (Integrated Waste Management Act of 1989) to reduce GHG emissions associated with virgin material extraction.</p>	<p>Prior to the issuance of building permits, MM IV.J.3-1 requires a Recycling and Resource Recovery Plan be prepared to coordinate resource conservation and recycling for the Approved Project. The plan would include (1) a recycling program designed to reduce the amount of solid waste going to landfills; (2) measures for maximizing the recycling of demolition and construction debris; (3) recycling bins and chutes provided at appropriate locations to promote the recycling of paper, metal, glass, and other recyclable materials; (4) an education/outreach to reduce the output of solid waste through recycling and reduction of waste at the source; and (5) promote recycling to patrons and residents.</p>
<p><b>Urban Forestry</b></p> <p>Plant five million trees in urban areas by 2020 to effect climate change emission reductions.</p>	<p>MM IV.B.1-2 requires the Applicant to substitute vegetated surfaces for hard surfaces, which shall include 15 percent of the at-grade plaza and courtyards and 5 percent of elevated surfaces. In addition, the Approved Project's streetscape plan would provide for additional landscape areas.</p>
<p><b>Water Use Efficiency</b></p> <p>Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.</p>	<p>MM IV.J.1-1 requires the Approved Project to adhere to all applicable DWP rules and regulations. The DWP shall be consulted regarding feasible water conservation features, including xeriscape practices (e.g. use of drought-tolerant landscaping and drip irrigation systems), which can be incorporated into the design of the Approved Project. All necessary infrastructure improvements shall be constructed to meet the requirements of the DWP. MM IV.J.1-2 requires automatic sprinkler systems be set to irrigate landscaping during morning or evening hours to reduce water losses from evaporation. Sprinklers shall be reset to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation. MM IV.J.2-3 requires the Applicant to comply with all provisions of Ordinance No. 162,532, which reduces water consumption levels, thereby restricting wastewater flows. Water saving devices to be installed would include low flow</p>

**Table 6 (Continued)  
Consistency with Applicable California Climate Action Team Report Strategies  
(Approved Project)**

Strategies for Reducing GHG Emissions	Project Consistency
	toilets and plumbing fixtures that prevent water loss.
<b>Building Energy Efficiency Standards in Place and in Progress</b>	
The California Energy Commission updates building energy efficiency standards that apply to newly constructed buildings and additions to and alterations to existing buildings. Both the Energy Action Plan and the Integrated Energy Policy Report call for ongoing updating of the standards.	The Approved Project would comply with California Title 24 Energy Efficiency standards for residential and non-residential buildings to meet standards for water heating, space heating and cooling, to the extent feasible.
<b>Appliance Energy Efficiency Standards in Place and in Progress</b>	
Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development.	The Approved Project would implement LA Green Plan strategies, as feasible.
<b>Smart Land Use and Intelligent Transportation</b>	
Apply strategies that integrate transportation and land use decisions, including but not limited to promoting jobs/housing proximity, high-density residential/commercial development along transit corridors, and implementing intelligent transportation systems.	The Approved Project would integrate a variety of mutually supportive land uses that will make efficient use of land and infrastructure, and reduce employee, resident, and visitor trip distances. In addition, the Approved Project provides employment opportunities and residences near public transit; encourages pedestrian and bicycle circulation; provides development in proximity to regional corridors and within an area that is well-served by public transportation.
<b>Green Buildings Initiative</b>	
Reduce energy use in private buildings. .	The Approved Project would implement LA Green Plan strategies, as feasible.
<p><i>CAT strategies not listed are not applicable to this project.</i></p> <p><i>Source: Matrix Environmental, 2009.</i></p>	

## 2. Revised Project Impacts

### a. Construction

The Revised Project involves modifications to the land use mix entitled for the Olympic North Subarea under the Approved Project, resulting in an increase of 312,212 square feet of commercial floor area as compared to the Approved Project. Overall, the Revised Project would increase the maximum allowable development within the LASED from 5,977,806 square feet to 6,290,018 square feet. The amount of residential and hotel development allowed within the Olympic North Subarea would be reduced by 35 residential units (60,750 square feet) and 125 hotel rooms (143,500 square feet of hotel and ballroom uses) to accommodate the proposed office and broadcast/production studio space. 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. The overall amount of building construction would increase by 5.6 percent as a result of the Revised Project compared to the Approved Project. However, pollutant emissions and fugitive dust from site preparation and construction activities would be similar on a daily basis, as the duration and not the intensity of these activities would increase compared to the Approved Project. While construction emissions generated by the Revised Project would be slightly more than those of the Approved Project over the construction period, impacts during maximum conditions, those used for measuring significance, would be similar to those of the Approved Project. Therefore, as with the Approved Project, the Revised Project would result in a significant impact with respect to CO, ROC and NO<sub>x</sub> and daily PM<sub>10</sub> construction emissions but would not exceed the SCAQMD's significance thresholds for quarterly PM<sub>10</sub> or SO<sub>x</sub> during construction. The Revised Project would implement the same construction 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.

To accommodate the additional development proposed within the Olympic North Subarea, the size of the subarea would be increased by relocating the northern boundary northward, so that the subarea encompasses a greater portion of the block bounded by Georgia Street on the west, Francisco Street on the east, 9th Street on the north, and Olympic Boulevard on the south. However, this change in the northern boundary would not result in sensitive receptors to be located substantially closer to proposed construction activities. Thus, localized pollutant construction impacts would be similar to the Approved Project as the distance to sensitive receptors and the intensity of grading activities would not substantially change. As with the Approved Project, the Revised Project would result in a less than significant localized PM<sub>10</sub> impact on all sensitive receptors including, but not

limited to, nearby residential receptors as well as the Tenth Street and Norwood Street Schools.

## **b. Operation**

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. The Revised Project involves modifications to the land use mix entitled for the Olympic North Subarea under the Approved Project, resulting in an increase of 312,212 square feet of commercial floor area as compared to the Approved Project. In comparison to the Original LASED Project, the Revised Project weekday daily trips would decrease by 2.0 percent, but increase by 0.6 percent on the weekends. The increase in daily weekend trips would not substantially change projected emissions for the Olympic North Subarea under the Approved Project. As such, mobile source emissions would be expected to be similar under the Revised Project as compared to the Approved Project. Additionally, as the proposed change in land uses within the Olympic North Subarea would slightly increase the amount of commercial square footage development within the LASED, future stationary operational emissions (i.e., emissions associated with landscaping equipment) under the Revised Project would be slightly higher than would occur under the development entitled for the Olympic North Subarea under the Approved Project. Therefore, like the Approved Project, the Revised Project would result in a significant impact with respect to CO, ROC, NOx, and daily PM<sub>10</sub> operational emissions. Likewise, the Revised Project would not exceed the SCAQMD's significance thresholds for quarterly SOx during operation. Furthermore, the Revised Project would implement the same operational mitigation measures, as applicable, identified for the Approved Project. As such, the Revised Project would not involve any new significant impacts related to operational air quality and any incremental increase in emissions would be expected to be less than significant.

As discussed above, the Revised Project would generate a slight increase in the number of daily weekend trips that are entitled for the Olympic North Subarea under the Approved Project. Since local CO hotspots are directly proportional to increases in vehicular traffic and the local CO impacts were well below the ambient air quality standards for the Approved Project, sensitive receptors in the Project area are not anticipated to be significantly impacted by CO emissions related the Revised Project. The Revised Project would not involve any new significant localized air quality impacts and any incremental increase in localized air quality impacts would be expected to be less than significant.

## **c. Greenhouse Gas Emissions**

It is difficult to predict the specific impact of one project's incremental contribution to the global effects of GHG emissions due to a variety of factors, including the complex and

long term nature of such effects and the global scale of climate change.<sup>12</sup> However, it is possible to determine whether a project is implementing strategies consistent with State and local greenhouse gas emissions guidance and policies. Thus, if a project implements strategies consistent with the goals of AB 32, the LA Green Plan and the CAT Report, 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 Revised Project is designed with a number of features and mitigation measures consistent with those provided above for the Approved Project. The Revised Project promotes reductions in vehicle trips and the consequent generation of GHG emissions in the following ways: (a) by providing a mix of uses including commercial office, retail, restaurant, hotel, broadcast/production studio, and residential uses which reduces commuter trips and miles traveled for retail and restaurant uses; (b) by providing improved opportunities for the use of public transit, including bus and rail, and other alternative transportation modes; (c) by encouraging pedestrian and bicycle circulation through a well established sidewalk system in the Project vicinity; and (d) by providing on-site recreation and open space amenities. Although the Revised Project would result in an incremental increase in vehicular traffic, as further described in Section IV.F below, the increase in vehicular trips would not be of sufficient magnitude as to cause a significant increase in greenhouse gas emissions. While it is not possible at this time to quantify the exact amount of greenhouse gas emissions reduction anticipated, the Revised Project would be consistent with the goals of California's AB 32, LA Green Plan, and the CAT recommendations and strategies. Since the GHG analysis for the Approved Project did not result in any significant impacts, the Revised Project would likewise have less than significant GHG impacts for the reasons summarized above and elaborated on in the discussion of Approved Project impacts.

---

<sup>12</sup> *Ibid.* OPR indicates in the *Climate Change and CEQA Presentation to the Climate Action Team* that complex questions must be answered before a consistent, effective, and workable process can be developed for evaluating climate change under CEQA. Some of the questions cited include: What constitutes a new GHG emission? What is the appropriate baseline for calculating new emissions? What makes a project's GHG emissions significant? Is the effect of climate change too speculative to be considered a significant environmental impact? How much mitigation is enough to reduce the impact so it is not significant?



### **3. Mitigation Measures**

The Mitigation Measures that are identified in the Final EIR and the adopted MMRP (Mitigation Measures IV.I.E-1 through IV.E.-14) would also apply to the Revised Project. No additional mitigation measures are required due to the development of the Revised Project.

### **4. Conclusion**

Overall, the Revised Project would not introduce new or substantially worsen impacts with regard to air quality. Thus, the environmental implications of the Revised Project would be consistent with those analyzed under the Approved Project.

### **III. Environmental Impact Analysis**

---

#### **F.1 Transportation/Circulation - Traffic**

##### **1. Approved Project Impacts**

The Final 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 Final 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 Final EIR is no longer of relevance.

The Approved Project is served by an extensive freeway network, grid street system and public transit options including, but not limited to the Metro Blue Line. The Final EIR analyzed 40 intersections in the vicinity of the Project site during the weekday P.M. peak hour and for the Saturday evening hour. The traffic analysis included in the Final EIR concluded that 17 intersections would be significantly impacted during the weekday P.M. peak hour and 10 intersections during the Saturday evening peak hour. However, with implementation of the required mitigation measures, significant impacts would be reduced to 15 intersections during the weekday P.M. peak hour and 8 intersections during the Saturday evening peak hour. The two subsequent Addendums concluded that the Approved Project would not introduce new significant impacts or substantially increase the severity of previously identified significant impacts with regard to intersection performance. Similar to the Final EIR, significant impacts would remain at 15 intersections during the weekday P.M. peak hour and 8 intersections during the Saturday evening peak hour under the Approved Project.

The Final EIR also concluded that a significant impact would occur at the 9th Street (James Wood Boulevard) 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, although such impacts are considered unlikely due to the fact that the arterial streets provide the most direct and convenient access to the Project site. The two subsequent Addendums concluded that the Approved Project would not introduce new significant impacts or substantially increase the severity of previously identified significant impacts with regard to freeway ramps and residential streets.

Finally, the Final EIR concluded that significant impacts would also occur at two CMP Freeway monitoring locations along the SR-110 segment south of US-101 and along the SR-110 segment at Alpine Street, even though these freeway segments would operate at LOS F without the Project. The Final EIR concluded that no mitigation measures are available to reduce the impacts on these CMP freeway locations to a less than significant level. As such, impacts on these two locations remain significant and unavoidable. The two subsequent Addendums concluded that the Approved Project would not introduce new significant impacts or substantially increase the severity of previously identified significant impacts with regard to CMP Freeway monitoring locations and significant impacts would remain along the SR-110 segment south of US-101 and along the SR-110 segment at Alpine Street.

The Final EIR also concluded that on-site development would generate 695 transit trips during the weekday P.M. peak hour and 575 transit trips during the Saturday evening peak hour. These trips would result in less than significant impacts to the local transit system, based on the total transit capacity serving the area. The two subsequent Addendums found that the Approved Project would not result in any significant increase in transit trips and would likewise not result in additional significant impacts with regard to transit trips.

## **2. Revised Project Impacts**

While the types of construction activity for the Revised Project may differ from the Approved Project due to changes in the amounts and types of uses to be developed, the changes in the maximum amount of daily construction activity for the Revised Project would not be sufficiently different to result in a substantial increase in construction traffic impacts than those forecasted to occur under the Approved Project. Thus, the Revised Project would not create new or substantially increase the severity of the temporary significant construction impact associated with the Approved Project. As noted above, as the realignment of 12th Street between Figueroa and Flower Streets has been completed, the temporary significant impact identified in the Final EIR that was associated with this improvement would no longer occur.

Traffic impacts of the Revised Project, as is the case with the Approved Project, result from the number of vehicle trips generated by the land uses that would be developed. To assess the comparative impacts of the Revised Project, trip generation forecasts have been developed for the land uses proposed for the Revised Project. The methodology used to forecast the trips generated by the Revised Project was the same as those used in the Final EIR and subsequent Addendums, with certain updates and/or adjustments to reflect new land uses that are now proposed under the Revised Project. The analysis used the trip rates established in the original Specific Plan and in the Specific Plan Amendment dated January 27, 2007 (2007 Specific Plan Amendment). At this time,

all of the individual projects within the Project site have been approved, with the exception of the Olympic North Subarea. The trip generation analysis therefore utilizes the actual land use quantities identified in the approved PPCRs for each project and applies the appropriate Specific Plan trip rate.

Some of these projects were approved under the Final EIR, so the trip rates applied for these projects were from that document. Other projects were approved after the 2007 Specific Plan Amendment. This amendment identified slightly modified trip rates (due to the overall level of land use changes at the Project site). For projects approved after the 2007 Specific Plan Amendment, the trip rates established therein were used. The differences are slight, but the above approach, including the use of actual approved land uses, is considered the most accurate method of estimating trips generated under the Approved Project because it tracks the trips tied to the actual entitlements.

For the Olympic North Subarea, the proposed land uses for the Revised Project were used, along with the current Specific Plan trip rates. For one land use type in the proposed Olympic North project, that of Production/Technical/Studio space, there is no trip rate specified in the Specific Plan. In this instance, a trip rate specific to this land use type was developed and approved by LADOT for use in this Addendum and proposed Specific Plan Amendment pursuant to Section 14.A of the Specific Plan.

The trip generation analysis was conducted for the entire Project site. A comparison of the trip generation totals included in the Final EIR, the Approved Project, and the Revised Project are presented in Table 7 on page 72 and are analyzed below.

#### **a. P.M. Peak Hour Trips and Traffic Impacts**

The Revised Project would generate a total of 3,541 P.M. peak hour trips, which would be about 16% more than the total of 3,058 trips generated by the Approved Project. This total would however be 2% less than the 3,612 trips analyzed in the Final EIR.

There would be an approximately 14% decrease in the number of P.M. peak hour inbound trips and an approximately 11% increase in P.M. peak hour outbound trips for the Revised Project compared to the trips in the Final EIR. The proportion of P.M. peak hour trips that would be inbound would be very similar, at 46% for the Revised Project and 52% in the Final EIR.

III. Environmental Impact Analysis

Table 7  
Trip Generation: Approved Project and Revised Project

Parameter	Final EIR		Approved Project				Revised Project					
	Trips	% I/B	Trips	% I/B	Difference to Final EIR		Trips	% I/B	Difference to Approved Project			
					Trips	Percent			Trips	Percent		
<b>P.M. Peak Hour</b>												
Inbound Trips	1,881	52%	1,539	50%	-342	-18.2%	1,613	46%	+74	+4.8%	-268	-14.2%
Outbound Trips	1,731		1,519		-212	-12.2%	1,928		+409	+26.9%	+197	+11.4%
<b>Total Trips</b>	<b>3,612</b>		<b>3,058</b>		<b>-554</b>	<b>-15.3%</b>	<b>3,541</b>		<b>+483</b>	<b>+15.8%</b>	<b>-71</b>	<b>-2.0%</b>
<b>Saturday Evening Peak Hour</b>												
Inbound Trips	3,588	69%	3,625	69%	+37	+1.0%	3,576	69%	-49	-1.4%	-12	-0.3%
Outbound Trips	1,593		1,602		+9	+0.6%	1,638		+36	+2.2%	+45	+2.8%
<b>Total Trips</b>	<b>5,181</b>		<b>5,227</b>		<b>+46</b>	<b>+0.9%</b>	<b>5,214</b>		<b>-13</b>	<b>-0.2%</b>	<b>+33</b>	<b>+0.6%</b>

Source: The Mobility Group, 2009.

As the overall trips total for the Revised Project would be less than the number of trips analyzed in the Final EIR, and as the overall inbound/outbound totals and proportion of trips that are inbound are very similar, the Revised Project would not create any new significant traffic impacts, or substantially worsen the previously identified significant impacts in the P.M. peak hour.

### **b. Saturday Evening Peak Hour Trips and Traffic Impacts**

The Revised Project would generate a total of 5,214 trips in the Saturday Evening peak hour, which would be about 0.2% less than the total of 5,227 trips identified for the Approved Project. While this trip total would be approximately 0.6% greater than the 5,181 trips analyzed in the Final EIR, it was previously determined for the Approved Project that 5,227 trips would not constitute a significant increase in trips over the Final EIR nor cause additional significant impacts.

There would be an approximately 0.3% decrease in the number of Saturday Evening peak hour inbound trips and an approximately 3% increase in Saturday Evening peak hour outbound trips for the Revised Project compared to the trips in the Final EIR. The proportion of total trips that would be inbound would be 69% in all cases.

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 and the proportion of trips that are inbound would all 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.

In order to provide a more conservative analysis, a comparison of trip distribution among the Final EIR, Approved Project and Revised Project also was performed. This is because in the Final EIR the trips that are generated were assigned to the roadway network by distributing them to the individual blocks within the Project site based on the parking supply and not the land uses, because people may not park on the same block as their land use destination.

The Final EIR anticipated providing a total of 5,305 on-site parking spaces, of which 59 percent (3,115 spaces) would be located on the Olympic Subareas and the remaining 41 percent (2,190 spaces) would be located on the Figueroa Subareas. Similarly, the Approved Project anticipated providing a total of 7,068 on-site parking spaces, of which 52 percent (3,682 spaces) would be located on the Olympic Subareas and the remaining 48 percent (3,386 spaces) would be located on the Figueroa Subareas. The Revised Project would provide a total of 7,083 on-site parking spaces, of which 52 percent (3,697 spaces) would be located on the Olympic subareas, and the remaining 48 percent

(3,386 spaces) would be located on the Figueroa Subareas. This information is discussed further in Section F.2, Parking, of this Addendum. It is therefore concluded that the overall parking supply levels anticipated in the Revised Project, and the distribution within the Project site, are not substantially different from those in the Approved Project, and thus, would not lead to substantial differences in trip distribution when compared to the Approved Project.

Based on this analysis it is concluded that the Revised Project would not create any new significant impacts or substantially worsen the significant traffic impacts identified in the Final EIR and subsequent Addendums with regard to intersections, freeway ramps, CMP Freeway monitoring locations, transit system and residential streets. As a result, no further traffic analysis is necessary.

### **3. Mitigation Measures**

The mitigation measures identified in the Final EIR, Addendums, and the adopted MMRP to reduce impacts related to Approved Project increases in traffic (Mitigation Measure IV.F.1-1 through IV.F.1-25) would also apply to the Revised Project. No additional mitigation measures are required due to the development of the Revised Project.

### **4. Conclusion**

Overall, the Revised Project would not introduce new significant impacts or substantially increase the severity of previously identified significant impacts with regard to traffic. Thus, the environmental implications of the Revised Project would be consistent with those analyzed under the Approved Project.

### **III. Environmental Impact Analysis**

---

#### **F.2 Transportation/Circulation - Parking**

##### **1. 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. However, adequate replacement of STAPLES Center parking would be maintained. Thus, no significant parking impacts would occur during construction of the Approved Project.

The Approved Project would provide on-site parking spaces in accordance with City parking code requirements. Additionally, it is anticipated that weekday typical parking demand would be met through compliance with City code. During peak hours on Saturdays, any excess need for parking would be met by nearby off-site parking in public and private lots. Overall, parking impacts associated with operation of the Approved Project would be less than significant.

##### **2. Revised Project Impacts**

The Revised Project, as with the Approved Project, would utilize nearby STAPLES Center and Nokia Theater parking lots for construction parking. Due to the changes in the amounts and types of uses to be developed under the Revised Project, the types of construction activity that would occur under the Revised Project may differ from those of the Approved Project. Notwithstanding, it is anticipated that the change in the maximum amount of daily construction activity for the Revised Project, if it occurs at all, would be incremental in nature, and would not be sufficiently different from those of the Approved Project to result in a substantial increase in construction parking impacts. 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.

Regarding Revised Project operations, the updated parking program follows the same overall strategy and principles that were established for the Approved Project, with respect to the proposed parking supply. Due to the changes in the proposed land uses, some of the parking numbers for code requirements, proposed supply, and typical and peak parking demands also change. The following analysis of the Revised Project uses



the same overall methodology and input/operating assumptions that were used in the Final EIR and subsequent environmental documentation.

The Revised Project proposes to provide a total of 7,083 spaces in parking garages at various locations on the Project site. It is anticipated that these spaces would be distributed across the Revised Project as shown in Table 8 on page 77, which also provides a comparison to the parking supply for the Approved Project.

The proposed parking supply numbers are slightly different than under the Approved Project for two reasons. First, the numbers for Olympic West and Olympic East Subareas represent the number of spaces actually built (which are slightly higher than originally estimated). Second, the number of proposed spaces for Olympic North Subarea would be decreased slightly under the Revised Project.

Under the Revised Project's parking plan, the total capacity of the proposed Olympic West garage would be 2,712 parking spaces. Of this total, 489 spaces would be reserved for STAPLES Center events and as such are excluded from this analysis. Also, the 2,712 space total includes an above grade deck of 354 spaces on the south half of the parcel. If and when the Los Angeles Convention Center expansion occurs, these spaces would have to be removed to accommodate the expansion. Due to the uncertainty and long-term nature of the potential LACC expansion, these 354 spaces have been included in this analysis. At such time as the LACC expansion occurs in the future, these spaces would therefore need to be replaced elsewhere.

Under the Approved Project, it was anticipated that a total of 7,068 on-site parking spaces would be provided across the LASED, of which 52 percent (3,682 spaces) would be located on the Olympic Subareas (Olympic West, Olympic East, and Olympic North), and the remaining 48 percent (3,386 spaces) would be located on the Figueroa Subareas (Figueroa North, Figueroa Central, and Figueroa South).

In comparison, the Revised Project would provide a total of 7,083 on-site parking spaces across the LASED, which is 15 parking spaces (or 0.2 percent) more than provided under the Approved Project. Similar to the Approved Project, of the Revised Project's total parking, 52 percent (3,697 spaces) would be located on the Olympic Subareas, and the remaining 48 percent (3,386 spaces) would be located on the Figueroa Subareas.

The number of parking spaces for the commercial uses under the Revised Project would increase slightly from that analyzed under the Approved Project by about 62 spaces, from 4,101 spaces under the Approved Project to 4,163 spaces under the Revised Project. The distribution of commercial spaces would also be very similar, with 74 percent of the

**Table 8**  
**Comparison of Proposed On-Site Parking Spaces**

<b>Subarea</b>	<b>Approved Project (Spaces)</b>	<b>Revised Project (Spaces)</b>
Olympic West	2,186	2,223
Olympic East	1,146	1,174
Olympic North	350	300
Figueroa North	594	594
Figueroa Central	1,930	1,930
Figueroa South	862	862
<b>Total</b>	<b>7,068</b>	<b>7,083</b>

*Note: The Figueroa Central Project (2007 EIR Addendum) did not summarize parking totals for the LASED as a whole. The parking numbers presented above are from 2006 Specific Plan Amendment, with adjusted numbers for the approved Figueroa Central Project.*

*Source: The Mobility Group, 2009.*

spaces located on the Olympic Subareas under both the Approved Project and the Revised Project.

With respect to the commercial parking spaces, it is therefore concluded that the overall parking supply levels anticipated for the Revised Project would not create any new impacts, nor would the Revised Project increase the severity of any previously identified impacts. As with the Approved Project, impacts with regard to commercial parking would be less than significant.

The Final EIR stated that 2,200 of the existing surface parking spaces for the STAPLES Center that were located on the Olympic West, Olympic East, and Olympic North Subareas of the LASED would be replaced in the new Olympic West Subarea garage. The Revised Project also proposes replacement of these spaces but in a slightly different fashion, though still in various nearby locations. The Revised Project would relocate some spaces to the Los Angeles Convention Center garages (through a parking agreement), some spaces to the Olympic West garage, and some spaces in other nearby locations.

The Final EIR and subsequent Addendums determined that the Project would be considered to have a significant impact with regard to parking if the parking supply provided by the Project, either on-site or off-site by covenant per standard City procedures, did not meet the number of spaces required by the Los Angeles Municipal Code ("LAMC"). The same threshold was used for this updated analysis for the Revised Project.

## **a. Parking Code Requirements and Proposed Supply**

### **(1) Parking Code Requirements**

The current LASED Specific Plan (Section 14.D.2 and Parking Requirements Table) sets forth the requirements for parking by land use type. A total of 8,109 parking spaces would be required for the Revised Project, as shown in Table 9 on page 79. Of these, 7,197 spaces would be for the commercial and residential uses in the LASED, and 912 would be for the Los Angeles Convention Center Expansion. The determination of parking space needs for the Convention Center Expansion is based on the latest requirement for the Convention Center of 3.65 spaces per 1,000 square feet as identified in the most recent zone variance for the Convention Center, ZA-1995-62-ZV, and as calculated for the 2006 EIR Addendum).

Table 10 on page 80 shows a comparison of the code-required parking as analyzed under the Approved Project and for the Revised Project, broken down by commercial and residential uses, and excluding the Convention Center Expansion requirements for a more direct comparison. As can be seen, the overall parking required for the LASED, excluding the parking requirements for the Convention Center expansion, increases under the Revised Project to 7,197 spaces, as compared to 6,887 spaces under the Approved Project.

### **(2) Proposed Project Parking Supply**

The Revised Project would provide a total of 7,083 spaces on-site, and 1,030 spaces off-site, for a total of 8,113 spaces. This would meet the code requirement of 8,109 spaces. As is the case with the Approved Project, the off-site spaces would be located within 1,500 feet of the Project site as required by the LASED Specific Plan, most probably to the north and east of the Project site. It is therefore concluded, as it was under the Approved Project, that the Revised Project would conform to the requirements of the LAMC and that parking impacts would be less than significant. Furthermore, the Revised Project would not introduce new or substantially worsen impacts with regard to parking supply.

## **b. Analysis of Parking Demand and Proposed Supply**

The Final EIR and subsequent Addendums also analyzed issues relating to estimated parking demand. The parking demand analysis was updated for the Revised Project, using the same methodology and parameters as used in the Final EIR and subsequent environmental documentation. The analysis focused on scenarios when there are concurrent events at STAPLES Center as the Typical Day condition. Table 11 on page 80 shows the results of this analysis for the Approved Project and the Revised Project, and shows: the code requirement (as previously discussed); the proposed supply (as previously

**Table 9  
Parking Code Requirement**

Land Use	Code Requirements		
	Size	Units	Rate
Hotel Rooms	1,498	Rooms	<sup>a</sup>
Hotel Banquet / Meeting	110,893	Net SF	1 sp / 100 s.f
Restaurants	210,851	GSF	1 sp / 1,000 s.f
Retail	179,169	GSF	1 sp / 1,000 s.f
Health Club	47,485	GSF	1 sp / 1,000 s.f
General Office / Sports Broadcast Office	613,100	GSF	1 sp / 1,000 s.f
Production Office / Studio	298,500	GSF	1 sp / 1,000 s.f <sup>b</sup>
Medical Office	0	GSF	1 sp / 1,000 s.f
Residential	2,065	DU	
Entertainment:			
Live Theater <sup>b</sup>	9,500	Seats	1 sp / 10 Seats
Night Club /			
Sports Bar / Museum	67,080	GSF	1 sp / 100 s.f
Other			
Cinemas	3,780	Seats	1 sp / 10 Seats
Educational	95,706	GSF	2 sp / 1,000 s.f
Convention Center Expansion	250,000	GSF	3.65 sp / 1,000 s.f
		<b>Project Total</b>	<b>8,109</b>

<sup>a</sup> Hotel parking requirement 1/2 space per room for first 20 rooms, 1/4 space for next 20 rooms, 1/6 space per room for remaining rooms.  
<sup>b</sup> Live Theater includes 7,100 Patrons for the Nokia Live Theater and 2,400 Patrons for the Club Nokia.  
<sup>c</sup> Code requirement for residential land use is calculate at 1.25 space per D.U except for Figueroa North block, which is outside the Specific Plan Area and where code requirement was calculated per FIDM Application (VTT 62298, ZA 2005-2948 (ZV)(ZAA)(SPR) and Hanover Approval (VTT 62006, ZA 2004-7070 (ZV)(YV)(ZAA)(SPR).  
<sup>d</sup> Per FIDM application, May 2006 (VTT 62298, ZA 2005-2948 (ZV) (ZAA) (SPA).  
<sup>e</sup> Based on current LACC parking provision ratio (ZA-1995-62-ZV).  
<sup>f</sup> Office parking requirement assumed to be 0.6 sp/1,000 sf in Olympic North (367,300 sf) as of PD 6-18-09.  
<sup>g</sup> For uses north of Olympic Boulevard, the parking rate for office uses is 0.6 sp per 1,000 square feet.  
<sup>h</sup> Code requirement for General Office assumed.

Source: The LASED SPA 2006, Figueroa Central PPCR 3-1-07, and Olympic North PD as of 6-18-09.

**Table 10  
Comparison of Code Required Parking Spaces**

Land Use	Approved Project	Revised Project
Commercial	4,298	4,653
Residential	2,589	2,544
<b>Total</b>	<b>6,887</b>	<b>7,197</b>

Note: Excludes LACC Expansion requirement of 912 spaces.

Source: The Mobility Group, 2009.

**Table 11  
Comparison of Parking Supply and Demand**

	Approved Project		Revised Project	
	Weekday (8 - 9 P.M.)	Saturday (8 - 9 P.M.)	Weekday (8 - 9 P.M.)	Saturday (8 - 9 P.M.)
<b>City Code Requirement</b>	7,799	7,799	8,109	8,109
<b>Project Parking Supply</b>				
On-site Supply	7,068	7,068	7,083	7,083
Off-site Supply	735	735	1,030	1,030
<b>Total Project Supply</b>	<b>7,803</b>	<b>7,803</b>	<b>8,113</b>	<b>8,113</b>
<b>Typical Day Parking Demand</b>				
Visitors <sup>a</sup>	7,283	7,301	7,318	7,329
Employee	547	531	628	578
<b>Total Project Demand</b>	<b>7,830</b>	<b>7,832</b>	<b>7,946</b>	<b>7,907</b>
<b>Supply/Demand Difference Total</b>	<b>-27</b>	<b>-29</b>	<b>+167</b>	<b>+206</b>
<b>On-site</b>	<b>-215</b>	<b>-233</b>	<b>-235</b>	<b>-246</b>
<b>Typical Day Parking Demand</b>				
Visitors <sup>a</sup>	9,708	9,815	9,689	9,781
Employee	776	768	855	811
<b>Total Project Demand</b>	<b>10,484</b>	<b>10,583</b>	<b>10,544</b>	<b>10,592</b>
<b>Supply/Demand Difference Total</b>	<b>-2,681</b>	<b>-2,780</b>	<b>-2,431</b>	<b>-2,479</b>
<b>On-site</b>	<b>-2,640</b>	<b>-2,747</b>	<b>-2,606</b>	<b>-2,698</b>

Note: The Figueroa Central Project (2007 EIR Addendum) did not summarize parking totals for the LASED as a whole. The parking numbers presented above are from 2006 Specific Plan Amendment, with adjusted numbers for the approved Figueroa Central Project.

<sup>a</sup> Includes 5% excess for search for visitors. Includes resident parking.

Source: The Mobility Group, 2009.

discussed); the typical day parking demand and the peak day parking demand for both a weekday and a Saturday; and a comparison of the estimated parking demand to the proposed supply.

The parking demand for the Revised Project would be very similar to that analyzed for the Approved Project on both weekdays and Saturdays, with the peak time of demand occurring between 8:00 P.M. and 9:00 P.M. in both cases.

For the Revised Project on a Typical Day, the total peak parking demand of 7,907 spaces on a Saturday would be about 206 spaces less than the total available parking supply of 8,113 spaces. The on-site visitor parking demand of 7,329 spaces would be 246 spaces more than the on-site supply of 7,083 spaces. This on-site shortfall would be accommodated in the 1,030 off-site parking spaces provided by the Revised Project. Thus, there would be no significant parking impacts on a Typical Day. The Revised Project would provide sufficient parking spaces to meet the typical day parking demand.

As presented in Table 11, for the Revised Project on a Peak Day, the total peak parking demand of 10,592 parking spaces on a Saturday would be more than the total parking supply of 8,113 spaces, by 2,479 spaces. The on-site visitor need of 9,781 spaces would be more than the on-site supply of 7,083 spaces, by 2,698 spaces. These differences are similar to, but slightly lower than for the Approved Project. However, as previously identified in the Final EIR this excess of parking demand for a Peak Day would park off-site in the adjacent areas to the north and to the east, and utilize the existing abundance of off-site parking supply in both public and private lots. This parking demand would most likely be met in leased or public spaces. Since the peak parking demand for the Revised Project occurs at evening/night, the office parking spaces to the north and east of the Project, as well as parking proposed for the Olympic North Subarea, are prime candidates for shared parking opportunities. Similarly to the conclusion identified in the Final EIR and subsequent environmental documentation, off-site parking impacts are therefore not anticipated for the Revised Project.

As also identified in the Final EIR and subsequent environmental documentation, the parking program for the Revised Project would also include an off-site employee parking program. This program would be capable of accommodating the estimated 855 employee vehicles at peak times. These spaces would be accommodated in the 1,030 off-site parking space supply, and would be connected to the LASED by a shuttle bus system to the extent that the spaces are located beyond a reasonable walking distance. In conclusion, parking demand impacts for the Revised Project, as is the case with the Approved Project, are less than significant. Furthermore, the Revised Project would not introduce new or substantially worsen impacts with regard to parking demand.

### **3. Mitigation Measures**

The mitigation measure identified in the Final EIR, Addendums, and the adopted MMRP with regard to parking demand (Mitigation Measures IV.F.2-1 through IV.F.2-4) would also apply to the Revised Project. No additional mitigation measures are required due to the development of the Revised Project.

### **4. Conclusion**

Overall, the Revised Project would not introduce new significant impacts or substantially increase the severity of previously identified significant impacts with regard to parking. Thus, the environmental implications of the Revised Project would be consistent with those analyzed under the Approved Project.

### **III. Environmental Impact Analysis**

---

#### **G. Hazardous Materials**

##### **1. Approved Project Impacts**

During Approved Project construction, 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. Furthermore, 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.

Operation of the Approved Project would involve the use of small quantities of potentially hazardous materials such as cleaning solvents, detergents, and pesticides. However, these hazardous materials would be stored, handled, and disposed of in accordance with all applicable federal, state, and local regulations. As such, operational impacts regarding hazardous materials would be less than significant.

##### **2. 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, via compliance with existing regulations and the same mitigation measures as those that apply to the Approved Project, no additional risk to the public would result. Excavation and earthwork activities under the Revised Project would be greater than those of the Approved Project. While the depth of excavation would be similar to the Approved Project, the total land area to be excavated would be greater. As such, the potential to release contaminants during these phases of construction would be somewhat increased under the Revised Project. Nonetheless, while the peak daily construction



activities and the amount of excavated area may increase under the Revised Project, compliance with existing regulations, as well as the adopted mitigation measures, would result in less than significant hazardous impacts related to the release of contaminants during construction. As such, the Revised Project would not create any new impacts with respect to hazardous materials during construction or would increase the severity of any previously identified impacts. Thus, with the implementation of the adopted mitigation measures, the construction impacts of the Revised Project, as is the case with the Approved Project, would be less than significant.

The Revised Project would develop the same types of land uses as the Approved Project within the LASED, and thus would involve the use of the same types of hazardous materials. As the Revised Project would increase the amount of development in the LASED, the use of hazardous materials during operation would be incrementally increased. However, as with the Approved Project, all potentially hazardous materials would be stored, handled, and disposed of properly in compliance with existing regulations. As such, the increase in office uses that would occur under the Revised Project would not create any new impacts with respect to hazardous materials during operation, nor would the Revised Project increase the severity of any previously identified impacts. Thus, as with the Approved Project, the operational impacts of the Revised Project would be less than significant.

### **3. Mitigation Measures**

The Mitigation Measures that are identified in the Final EIR, Addendums, and the adopted MMRP ensure no significant hazardous materials impacts occur during construction (particularly the removal of asbestos-containing materials or lead-based paints) and that previously undiscovered hazardous materials are handled accordingly (Mitigation Measures IV.G-1 through IV.G-5) would also apply to the Revised Project. No additional mitigation measures are required due to the development of the Revised Project.

### **4. Conclusion**

Overall, the Revised Project would not introduce new significant impacts or substantially increase the severity of previously identified significant impacts with regard to hazardous materials. Thus, the environmental implications of the Revised Project would be consistent with those analyzed under the Approved Project.

### **III. Environmental Impact Analysis**

---

#### **H. Noise**

##### **1. Approved Project Impacts**

###### **a. Construction**

Construction activity associated with the Approved Project within the Olympic North Subarea could be as close as 50 feet from existing apartments located northeast of Olympic Boulevard and Francisco Street. During the heaviest periods of construction activity, the Approved Project could result in a construction noise level as high as 89 dBA during short instances at these apartments. As construction on portions of the Olympic and Figueroa Properties would have the potential to exceed 75 dBA within 500 feet of existing residential areas, construction-related noise levels would adversely impact sensitive land uses. Mitigation measures were identified for the Approved Project to reduce construction-related noise impacts to some extent; nonetheless, it was concluded that construction-related noise impacts would be significant and unavoidable.

###### **b. Operation**

It was concluded that Approved Project land uses (hotel, retail, office, and residential) would not typically involve operations that generate noise levels that can result in significant impacts. Recreational facilities such as outdoor pools, spas, and potentially tennis courts would be expected to be shielded from direct line of sight from off-site locations. As such, noise from these activities would not be expected to generate significant noise impacts at nearby sensitive receptors and would thus be considered less than significant. It was also concluded that the Approved Project could introduce traffic-related noise levels that would result in a significant impact at sensitive land uses located along portions of Francisco Street. Mitigation measures were identified for the Approved Project to reduce operational noise impacts to some extent; nonetheless, the Approved Project was concluded to result in significant and unavoidable operational noise impacts.

## **2. Revised Project Impacts**

### **a. Construction**

The Revised Project involves modifications to the land use mix entitled for the Olympic North Subarea under the Approved Project, resulting in an increase of 312,212 square feet of commercial floor area as compared to the Approved Project. Overall, the Revised Project would increase the maximum allowable development from 5,977,806 square feet to 6,290,018 square feet. The amount of residential and hotel square footage allowed within the Olympic North Subarea would be reduced by 35 residential units (60,750 square feet) and 125 hotel rooms (143,500 square feet of hotel and ballroom uses) to accommodate the proposed office and broadcast/production studio space. 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. The overall amount of building construction would increase by 5.6 percent as a result of the Revised Project compared to the Approved Project. However, construction activities and resulting noise levels would be similar on a daily basis, as the duration and not the intensity of these activities would increase compared to the Approved Project.

To accommodate the additional development proposed within the Olympic North Subarea, the size of the Subarea would be increased by relocating the northern boundary northward, so that the Subarea encompasses a greater portion of the block bounded by Georgia Street on the west, Francisco Street on the east, 9th Street on the north, and Olympic Boulevard on the south. The relocation of the Olympic North Subarea's northern boundary would effectively increase the size of the Subarea. However, this change in the northern boundary would not result in sensitive receptors to be located substantially closer to proposed construction activities. Thus, construction noise levels for the Revised Project would be similar to the Approved Project as the distance to sensitive receptors and the intensity of construction activities would not substantially change. 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 nor result in a substantial increase in a previously identified significant impact.

### **b. Operation**

The Revised Project involves modifications to the land use mix entitled for the Olympic North Subarea under the Approved Project, resulting in an increase of 312,212 square feet of floor area as compared to the Approved Project. As discussed above, hotel, retail, office, broadcast/production studios and offices, and residential land

uses would not typically involve operations that generate noise levels that would result in significant impacts. Thus, the modification to the land use mix would not be anticipated to generate significant noise levels at nearby sensitive receptors and would be considered less than significant. In comparison to the project analyzed in the Final EIR, the Revised Project weekday P.M. daily trips would decrease by 2.0 percent, but increase by 0.6 percent on weekends. On an overall basis, the volume and distribution of traffic under the Revised Project are comparable to those of the Approved Project. Furthermore, 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 result in a new significant and unavoidable impact or substantially worsen a previously identified significant impact with respect to operational noise.

### **3. Mitigation Measures**

The Mitigation Measures that are identified in the Final EIR, Addendums and the adopted MMRP (Mitigation Measures IV.H-1 through IV.H.-9) would also apply to the Revised Project. No additional mitigation measures are required due to the development of the Revised Project.

### **4. Conclusion**

Overall, 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 under the Approved Project.

### **III. Environmental Impact Analysis**

---

#### **I. Public Services**

##### **1. Fire Protection**

###### **a. Approved Project Impacts**

Traffic disruptions during construction of the Approved Project would be temporary and would not be anticipated to significantly affect emergency access or response as there is a wide selection of alternate routes to and through the LASED. Therefore, it was concluded that no significant impacts to fire protection services would occur during construction.

During operation, the Approved Project's land uses would increase the need for LAFD services. However, with implementation of the adopted mitigation measures, this impact would be reduced to a less than significant level. Impacts with respect to response distance would also be less than significant since the nearest fire station (i.e., Fire Station No. 10) is located approximately 0.6 miles from the LASED area. Additionally, two other LAFD fire stations were identified as being located within 1.1 miles of the LASED. During post-event periods at the STAPLES Center and the Convention Center, traffic congestion could potentially cause significant delays in LAFD emergency response times into the LASED. However, with the implementation of the adopted mitigation measures, this impact would be reduced to a less than significant level. It was found that fire flow requirements for the Approved Project would be determined by the LAFD during final review of all site plans. Furthermore, hydrants would be installed to LAFD requirements. As the Approved Project would implement mitigation measures to ensure fire flows would be adequate, it was concluded that impacts to fire flow service would be less than significant.

###### **b. Revised Project Impacts**

The Revised Project would increase the total amount of development within the LASED. While an increase in construction would occur under the Revised Project, impacts with regard to emergency access are not anticipated since Revised Project construction traffic would typically occur during off-peak hours and be predominantly freeway oriented. In conjunction with the ongoing maintenance of LAFD emergency access to the Olympic North Subarea, the LASED, and adjoining properties during construction, Revised Project

impacts with regard to emergency access would 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 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, relative 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 Revised Project involves construction and operation activities that extend beyond the boundaries of the existing Olympic North Subarea analyzed under the Approved Project. However, due to the overall changes in development under the Revised Project, a comparable number of daily vehicle trips would be generated when compared to the Approved Project and the overall increase in trips would be negligible. 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. Thus, the Revised Project would result in a less than significant impact with regard to emergency vehicle access, as is the case with the Approved Project. Furthermore, the Revised Project would implement the same mitigation measures identified for the original LASED Project. As such, the Revised Project would not create any new impacts with respect to fire protection services nor increase the severity of any previously identified impacts. Therefore, impacts on fire protection services would be less than significant, as is the case with the Approved Project.

### **c. Mitigation Measures**

The Mitigation Measures that are identified in the Final EIR, Addendums, and the adopted MMRP to ensure adequate fire protection and emergency services (Mitigation Measures IV.I.1-1 through IV.I.1-18) would also apply to the Revised Project. No additional mitigation measures are required due to the development of the Revised Project.

### **d. Conclusion**

Overall, the Revised Project would not introduce new significant impacts or substantially increase the severity of previously identified significant impacts with regard to fire protection services. Thus, the environmental implications of the Revised Project would be consistent with those analyzed under the Approved Project.

## **2. Police**

### **a. Approved Project Impacts**

Construction of the Approved Project may result in temporary lane closures. However, due to the temporary and limited nature of the closures along roadways and the wide selection of alternate routes to and through the LASED, emergency access and response times would not be significantly affected. With the implementation of the adopted mitigation measures, construction impacts with regard to police services would be reduced to less than significant levels.

During operation, 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 that would minimize the potential for on-site crime and reduce the demand for additional police services. These features include private on-site security, adequate parking lot lighting, and development of an Emergency Procedures Plan. These security features, along with the implementation of mitigation measures, would reduce the Approved Project's impact on police services to a less than significant level. In addition, traffic during events at the STAPLES Center could potentially disrupt emergency access and cause delays for emergency responses within the LASED. However, the Approved Project would implement mitigation measures to reduce this impact to a less than significant level. Thus, the increase in demand for police protection services was similarly concluded to be less than significant.

### **b. Revised Project Impacts**

The Revised Project would increase the total amount of development within the LASED. While an increase in construction would occur under the Revised Project, impacts with regard to emergency access are not anticipated since Revised Project construction traffic would typically occur during off-peak hours and be predominantly freeway oriented. In conjunction with the ongoing maintenance of emergency access to the Olympic North Subarea, the LASED, and adjoining properties during construction, Revised Project impacts with regard to emergency access would not be substantially greater than those resulting from construction activities associated with the Approved Project. 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 LAPD utilizes an area's resident population to determine service needs, in the form of an officer-to-resident ratio. The Revised Project would involve a change in the land use mix for the Olympic North Subarea, and would involve a decrease in the previously approved residential units. As such, the Proposed Project would decrease the residential

population, and therefore, would not negatively impact the officer-to-resident ratio when compared to the Approved Project. Nonetheless, as the Revised Project would increase the commercial and overall uses in the LASED area, during operation, the Revised Project's increased activity levels would create a slight increase in demand on police protection services over 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 similarly minor. Furthermore, the Proposed Project would include security features and would implement the same mitigation measures identified for the original LASED Project. Additionally, as the Revised Project would not result in a significant increase in traffic conditions as compared to the Approved Project (see discussion in Transportation/Circulation – Traffic), the Revised Project would result in a less than significant impact on emergency response with the implementation of the adopted mitigation measures. As such, the Revised Project would not create any new impacts with respect to police protection services nor increase the severity of any previously identified impacts.

### **c. Mitigation Measures**

The Mitigation Measures that are identified in the Final EIR, Addendums, and the adopted MMRP to ensure adequate on-site security and minimize on-site demand for LAPD services, both during construction and operation (Mitigation Measures IV.1.2-1 through IV.1.2-13), would also apply to the Revised Project. No additional mitigation measures are required due to the development of the Revised Project.

### **d. Conclusion**

Overall, the Revised Project would not introduce new significant impacts or substantially increase the severity of previously identified significant impacts with regard to police services. Thus, the environmental implications of the Revised Project would be consistent with those analyzed under the Approved Project.

## **3. Schools**

### **a. Approved Project Impacts**

The Approved Project would generate a total of 2,352 new students, as shown in Table 12 on page 92. It was determined that these students would attend 10th Street Elementary School, Berendo Middle School, and Belmont High School. The students generated by the Approved Project would exceed each of the school's forecasted future capacity. However, the Approved Project would pay development fees pursuant to



III. Environmental Impact Analysis

Table 12  
Projected Student Generation

School Level	Student Generation Rates for Apartments			Approved Project					Revised Project					
	Two Bedroom	Three Bedroom		Number of Proposed Units		Forecasted Student Generation			Number of Proposed Units <sup>b</sup>		Forecasted Student Generation			
	0.22	0.52		Two Bedroom	Three Bedroom	Two Bedroom	Three Bedroom	Total	Two Bedroom	Three Bedroom	Two Bedroom	Three Bedroom	Total	
Elementary				1,322	511	291	266	557	1,304	493	287	256	543	
Middle	0.1	0.2		1,322	511	132	102	234	1,304	493	130	99	229	
High	0.14	0.27		1,322	511	185	138	323	1,304	493	183	133	316	
				Total LA SED Specific Plan Area		608	506	1,114	Total LA SED Specific Plan Area		600	488	1,088	
Figueroa North				134	134	62	133	195	134	134	62	133	195	
				<b>TOTAL</b>	<b>TOTAL</b>	<b>670</b>	<b>639</b>	<b>1,309</b>	<b>TOTAL</b>	<b>TOTAL</b>	<b>662</b>	<b>621</b>	<b>1,283</b>	
													<b>Change</b>	
														<b>-26</b>

B. EMPLOYMENT

School Level	Student Generation Rate (per 2 employees)	Approved Project			Revised Project		
		Project Employment	Forecasted Student Generation	Revised Project Employment	Forecasted Student Generation		
Elementary	0.2	5,356	536	7,071	707		
Middle	0.08	5,356	214	7,071	283		
High	0.11	5,356	295	7,071	389		
		Total LA SED Specific Plan Area		Total LA SED Specific Plan Area			
Figueroa North		343	67	343	67		
		<b>TOTAL</b>	<b>1,112</b>	<b>TOTAL</b>	<b>1,446</b>		
					<b>+337</b>		
					<b>Change</b>		

Table 12 (Continued)  
Projected Student Generation

School Level	C. TOTAL STUDENT GENERATION			Revised Project			Change
	Residential	Employment	Total	Residential	Employment	Total	
Elementary	557	536	1,093	544	707	1,251	+158
Middle	234	214	448	229	283	512	+64
High	323	295	618	315	389	704	+86
Total LASED Specific Plan Area	1,114	1,045	2,159	1,088	1,379	2,467	+308
Figueroa North	195	67	262	195	67	262	0
<b>Total</b>	<b>1,309</b>	<b>1,112</b>	<b>2,421</b>	<b>1,283</b>	<b>1,446</b>	<b>2,729</b>	<b>+308</b>

<sup>a</sup> Student generation factors from the LASED Draft EIR, January 2001

<sup>b</sup> Similar to the split utilized for the Approved Project, residential units for the Olympic North Subarea under the Revised Project are assumed to be half (33 units) two-bedroom units and half (32 units) 3-bedroom units. When this split is applied to the previously approved residential units, it results in a reduction of 18 2-bedroom units and 18 3-bedroom units when compared to the Approved Project.

Source: Matrix Environmental, June 2009.

Government Code Section 65995. The payment of these development fees constitutes full mitigation of school impacts, and thus impacts under the Approved Project would be less than significant.

### **b. Revised Project Impacts**

The number of LAUSD students generated by a project is a function of the amount and types of proposed development. While the Revised Project would not change the types of development that would occur within the LASED, it would modify the quantity development permitted in the LASED. Specifically, the Revised Project would increase the amount of office and broadcasting/production development permitted, while reducing the amount of hotel and residential development permitted. As shown in Table 12, the Revised Project would result in 2,729 students, which is an increase of 308 students over the Approved Project. As a result, the Revised Project would increase overall school enrollments within the LASED, 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 are not anticipated to substantively impact the schools currently servicing the Project Site.

Since the student generation forecasts for the residential and non-residential portions of the Revised Project conservatively assume for purposes of analysis that none of the Revised Project residents are also Revised Project employees, the number of students generated by the non-residential development of the Revised Project is likely overstated. To the extent that employees of the Revised Project were to reside within the Project Site, the actual number of students generated by the Revised Project would be lower than that shown in this analysis because students generated by these employee residents would already be accounted for in the residential forecast. Additionally, as is the case with the Approved Project, the Revised Project would pay development fees to the LAUSD (which are adjusted based on the square footage of residential and commercial development). 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.

### **c. Mitigation Measures**

Approved Project impacts are less than significant with the payment of development fees to the LASUD. Similarly, the Revised Project would implement Mitigation Measure No. IV.I.3-1, identified in the 2007 Final EIR Addendum requiring the payment of school

fees, in accordance with the provisions of Government Code Section 65995. No additional mitigation measures are required due to the development of the Revised Project.

#### **d. Conclusion**

Overall, the Revised Project would not introduce new significant impacts or substantially increase the severity of previously identified significant impacts with regard to schools. Thus, the environmental implications of the Revised Project would be consistent with those analyzed under the Approved Project.

### **4. Parks and Recreation**

#### **a. Approved Project Impacts**

Across the City there is a currently a shortage of neighborhood parks, community parks, and regional parks. This condition also occurs within the area of the LASED. The demand for parks and recreational services is primarily the function of the amount of residential development in an area, as an area's residents are considered the primary users of recreation facilities. Non-residential uses do not generally result in a measurable increase on the use of parks facilities.

The Approved Project's new residential population of 5,966 persons would result in the 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, it was concluded that a significant impact on parks and recreational facilities would occur.

#### **b. Revised Project Impacts**

As discussed above, the demand for parks and recreation services generated by a project is primarily a function of the amount of residential development that is being proposed. 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 that occurs under the Revised Project would be generally satisfied and to the same degree as under the Approved Project. Additionally, similar to the Approved Project, the Applicant would also 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 Project would result in a slight reduction in the severity of a previously identified significant impact. However, the reduction in impact is not of a sufficient 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, although the Revised Project would reduce impacts when compared to those of the Approved Project.

### **c. Mitigation Measures**

The Mitigation Measures that are identified in the Final EIR, Addendums, and the adopted MMRP incorporate project design features (Mitigation Measures IV.I.4-1 and IV.I.4-2) would also apply to the Revised Project. No additional mitigation measures are required due to the development of the Revised Project.

### **d. Conclusion**

Overall, the Revised Project would not introduce new significant impacts or substantially increase the severity of 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 under the Approved Project.

### **III. Environmental Impact Analysis**

---

#### **J. Utilities**

##### **1. Water**

###### **a. Approved Project Impacts**

During construction, water would be used for dampening fill material and for dust control. It was concluded that 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's land uses would consume approximately 2,106,949 gallons per day (gpd) of water as shown in Table 13 on page 98. As the City is largely dependent on external water sources, there is no certainty that long-term water supplies would be available on a regional basis. Therefore, although the Approved Project's water demand would constitute a small portion of the regional water demand, impacts regarding water supply would be significant. It was concluded that impacts regarding water infrastructure would be less than significant as the Los Angeles Department of Water and Power ("LADWP") has indicated that the existing water distribution and treatment facilities would be adequate to provide for the Approved Project's water demand.

###### **b. Revised Project Impacts**

Potential impacts with regard to water demand during construction primarily result from the amount of excavation and earth moving occurring at the Project site, while during long-term operations, water demand results from the amount and types of development. 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 (i.e., excavation and earth moving). Therefore, the Revised Project would increase water demand during construction when compared to the Approved Project. Nonetheless, 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. As a result, the Revised Project would not create any new impacts with respect to water demand

**Table 13**  
**Estimated Water Demand for Approved and Revised Project**

Land Use	Size	Consumption Rate (gpd/unit) <sup>a</sup>	Total (gpd)
<b>LASED under Approved Project</b>			
Convention Center	250,000 sf	1.488	372,000
Cinema	3,780 seats <sup>b</sup>	6	22,680
Hotel	1,702 rms	156	265,512
Hotel Meeting/Ballroom Area <sup>c</sup>	162,290 sf	0.852	138,271
Office	245,800 sf	0.216	53,093
Residential	1,833 du	192	351,936
Retail/Entertainment/Restaurant	789,486	1.053	831,329
		<i>Subtotal LASED SPA</i>	<i>2,034,821</i>
<b>Figueroa North</b>			
Office	95,706	0.216	20,672
Residential	268	192	51,456
		<i>Subtotal LASED under Approved Project</i>	<i>2,106,949</i>
<b>LASED under Revised Project</b>			
Convention Center	250,000 sf	1.488	372,000
Cinema	3,780 seats <sup>b</sup>	6	22,680
Hotel	1,498 rms	156	233,688
Hotel Meeting/Ballroom Area	110,893 sf	0.852	94,481
Office	581,100 sf	0.216	125,518
Entertainment Studio/Production	266,500 sf	0.096 <sup>d</sup>	25,584
Residential	1,797 du	192	345,024
Retail/Entertainment/Restaurant	789,486	1.053	831,329
		<i>Subtotal LASED SPA</i>	<i>2,050,304</i>
<b>Figueroa North</b>			
Office	95,706	0.216	20,672
Residential	268	192	51,456
		<i>Subtotal LASED under Revised Project</i>	<i>2,122,432</i>
		<b>Net Change Revised Project</b>	<b>+15,483</b>

Notes: du = dwelling unit; rms = rooms; sf = square feet

<sup>a</sup> Water consumption rates based on 120 percent of wastewater generation rates provided in the LASED Final EIR, May 2001.

<sup>b</sup> The 2007 EIR Addendum evaluated a greater number of cinema seats (13,350 seats) than permitted within the LASED Specific Plan area (3,780 seats). While this Addendum corrects the overage, the correct number of seats is applied to both the Approved Project and the Revised Project. As such, no credit was taken for the additional cinema seats analyzed in the 2007 EIR Addendum.

<sup>c</sup> Under the Approved Project, Hotel Meeting/Ballroom floor area was estimated to be 10% of the total Hotel and Ballroom floor area detailed in the LASED Specific Plan.

<sup>d</sup> Generation factor derived from the City Bureau of Engineering and is based on 120 percent of wastewater generation rates.

Source: Matrix Environmental, June 2009.

during construction nor would it increase the severity of any previously identified impacts. Thus, as with the Approved Project, the Revised Project would result in a less than significant to water demand during construction

With regard to water demand during operation, the Revised Project's proposed changes to the development program of the Approved Project would change the estimated amount of water consumption within the LASED. As shown also in Table 13, 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. As such, the Revised Project would result in an incremental increase in water demand.

In addition, on a Project level, the Revised Project would implement the same mitigation measures, as applicable, recommended for 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 higher water demand of the Revised Project. Confirmation of this conclusion would occur in conjunction with the issuance of building permits per standard City procedures. In the event that insufficient capacity is available, improvements to the infrastructure system would be made to address any and all system deficiencies. As these improvements, if they are even needed, would be completed in accordance with standard City practices and procedures, environmental impacts associated with potential system expansion would be reduced to less than significant levels. Thus, as is the case with the Approved Project, the Revised Project would have a less than significant impact with regard to infrastructure within which the water would be conveyed.

### **c. Mitigation Measures**

The Mitigation Measures that are identified in the Final EIR, Addendums, and the adopted MMRP to ensure that on-site water resources are conserved to the extent feasible (Mitigation Measures IV.J.1-1 through IV.J.1-4) would also apply to the Revised Project. No additional mitigation measures are required due to the development of the Revised Project.

### **d. Conclusion**

Overall, the Revised Project would not introduce new significant impacts or substantially increase the severity of previously identified significant impacts with regard to water supplies and water infrastructure. Thus, the environmental implications of the Revised Project would be consistent with those analyzed under the Approved Project.



## 2. Sewer

### a. Approved Project Impacts

Based on the amount and types of land uses proposed, operation of the Approved Project, as shown on Table 14 on page 101, would generate approximately 1,756,236 gpd of wastewater. The existing sewer lines and trunk sewer surrounding the LASED were found to have available capacity to accommodate sewage generated by the Approved Project. Additionally, the Hyperion Wastewater Treatment Plant would also have sufficient capacity to serve the Approved Project. Thus, less than 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.

### b. Revised Project Impacts

Wastewater generated by a project is a function of the amount and types of development that is being proposed. As such, the Revised Project's proposed changes to the development program of the Approved Project would change the amount of sewage generated within the LASED. As shown in Table 14, the Revised Project would generate approximately 1,769,138 gpd of sewage, which is approximately 12,902 gpd (or approximately 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 it is anticipated that sufficient capacity would exist for this incremental increase. Confirmation of this conclusion would occur in conjunction with the issuance of building permits per standard City procedures. In the event that insufficient capacity is available, improvements to the infrastructure system would be made to address any and all system deficiencies. As these improvements, if they are even needed, would be completed in accordance with standard City practices and procedures, environmental impacts associated with potential system expansion would be reduced to less than significant levels. Additionally, the Revised Project would implement the same mitigation measures, as applicable, recommended in the Final EIR and subsequent Addendums, which would further reduce any incremental impacts related to sewer services. As a result, the Revised Project would not create any new impacts with respect to wastewater infrastructure, nor would the Revised Project increase the severity of any previously identified impacts. Thus, as with the Approved Project, less than significant impacts regarding sewage would occur with the Revised Project.

**Table 14  
Estimated Wastewater Generation for Approved and Revised Project**

Land Use	Size	Consumption Rate (gpd/unit) <sup>a</sup>	Total (gpd)
<b>LASED under Approved Project</b>			
Convention Center	250,000 sf	1.24	310,000
Cinema	3,780 seats <sup>b</sup>	5	18,900
Hotel	1,702 rms	130	221,260
Hotel Meeting/Ballroom Area <sup>c</sup>	162,290 sf	0.71	115,226
Office	245,800 sf	0.18	44,244
Residential	1,833 du	160	293,280
Retail/Entertainment/Restaurant	789,486	0.878	693,169
		<b>Subtotal LASED SPA</b>	<b>1,696,079</b>
<b>Figueroa North</b>			
Office	95,706	0.18	17,277
Residential	268	160	42,880
		<b>Subtotal LASED under Approved Project</b>	<b>1,756,236</b>
<b>LASED under Revised Project</b>			
Convention Center	250,000 sf	1.24	310,000
Cinema	3,780 seats <sup>b</sup>	5	18,900
Hotel	1,498 rms	130	194,740
Hotel Meeting/Ballroom Area	110,893 sf	0.71	78,734
Office	581,100 sf	0.18	104,598
Entertainment Studio/Production	266,500 sf	0.08 <sup>d</sup>	21,320
Residential	1,797 du	160	287,520
Retail/Entertainment/Restaurant	789,486	0.878	693,169
		<b>Subtotal LASED SPA</b>	<b>1,708,981</b>
<b>Figueroa North</b>			
Office	95,706	0.18	17,277
Residential	268	160	42,880
		<b>Subtotal LASED under Revised Project</b>	<b>1,769,138</b>
		<b>Net Change Revised Project</b>	<b>+12,902</b>

Notes: du = dwelling unit; rms = rooms; sf = square feet

<sup>a</sup> Wastewater generation rates provided in the LASED Final EIR, May 2001.

<sup>b</sup> The 2007 EIR Addendum evaluated a greater number of cinema seats (13,350 seats) than permitted within the LASED Specific Plan area (3,780 seats). While this Addendum corrects the overage, the correct number of seats is applied to both the Approved Project and the Revised Project. As such, no credit was taken for the additional cinema seats analyzed in the 2007 EIR Addendum.

<sup>c</sup> Under the Approved Project, Hotel Meeting/Ballroom floor area was estimated to be 10% of the total hotel floor area in the LASED.

<sup>d</sup> Generation factor derived from the City Bureau of Engineering.

Source: Matrix Environmental, June 2009.

### c. Mitigation Measures

The Mitigation Measures that are identified in the Final EIR, Addendums, and the adopted MMRP to ensure that wastewater is reduced to the maximum extent feasible (Mitigation Measures IV.J.2-1 through IV.J.2-4) would also apply to the Revised Project. No additional mitigation measures are required due to the development of the Revised Project.

## **d. Conclusion**

Overall, the Revised Project would not introduce new significant impacts or substantially increase the severity of previously identified significant impacts with regard to wastewater flows and wastewater infrastructure. Thus, the environmental implications of the Revised Project would be consistent with those analyzed under the Approved Project.

## **3. Solid Waste**

### **a. Approved Project Impacts**

The Approved Project would generate demolition and construction building debris waste, such as rock, concrete, brick, sand, soil, asphalt, sheetrock, wood, metal, drywall, and cardboard. However, on-site source separation of waste materials for recycling would be implemented. Less than significant impacts with regard to solid waste disposal capacity are anticipated during construction of the Approved Project.

During Approved Project operation, approximately 22,025 pounds of solid waste per day, or 4,020 tons per year would be generated, as shown in Table 15 on page 103. This waste would likely be disposed of at landfills located within, as well as outside of, Los Angeles County. In particular, it was anticipated that operational waste would be disposed of at the Bradley Landfill, the Sunshine Canyon Landfill, and the Chiquita Canyon Landfill. Since the preparation of the Final EIR and subsequent Addendums, the Bradley Landfill has closed (i.e., ceased operation).

The Approved Project would implement source reduction, recycling, and diversion measures, which would serve to reduce the amount of waste disposed of at area landfills. It was concluded that the Approved Project would have a less than significant impact with regard to the remaining disposal capacity of available landfill facilities or their anticipated closure dates. As a result, the development of the Approved Project would result in a less than significant impact regarding solid waste.

### **b. Revised Project Impacts**

Potential solid waste impacts result from the amount and types of development that would occur during both construction and long-term operations. With regard to construction, the Revised Project would increase the amount of development in the LASED and thus, would also increase the amount of construction activities and the amount of construction debris generated (i.e., rock, asphalt, sheetrock). Thus, the Revised Project would result in an increase in the amount of solid waste generated during construction.

**Table 15**  
**Estimated Solid Waste Generation for Approved and Revised Project**

Land Use	Size	Consumption Rate (pounds/unit) <sup>a</sup>	Total (pounds)
<b>LASED under Approved Project</b>			
Convention Center	250,000 sf	5/1,000 sf	1,250
Cinema	3,780 seats <sup>b</sup>	1/seat	3,780
Hotel	1,702 rms	2/room	3,404
Hotel Meeting/Ballroom <sup>c</sup>	162,290 sf	5/1,000 sf	811
Office	245,800 sf	6/1,000 sf	1,475
Residential	1,833 du	4/du	7,332
Retail/Entertainment/Restaurant	789,486	2.948/1,000 sf	2,327
	<i>Subtotal LASED Specific Plan Area</i>		<b>20,379</b>
<b>Figueroa North</b>			
Office	95,706	0.18	574
Residential	268	160	1,072
	<i>Subtotal LASED under Approved Project</i>		<b>22,025</b>
<b>LASED under Revised Project</b>			
Convention Center	250,000 sf	5/1,000 sf	1,250
Cinema	3,780 seats <sup>b</sup>	1/seat	3,780
Hotel	1,498 rms	2/room	2,996
Hotel Meeting/Ballroom	110,893 sf	5/1,000 sf	554
Office	581,100 sf	6/1,000 sf	3,487
Entertainment Studio/Production	266,500 sf	6/1,000 sf	1,599
Residential	1,797 du	4/du	7,188
Retail/Entertainment/Restaurant	789,486	2.948/1,000 sf	2,327
	<i>Subtotal LASED Specific Plan Area</i>		<b>23,181</b>
<b>Figueroa North</b>			
Office	95,706	0.18	574
Residential	268	160	1,072
	<i>Subtotal LASED under Revised Project</i>		<b>24,827</b>
	<b>Net Change Revised Project</b>		<b>+2,802</b>

Notes: du = dwelling unit; rms = rooms; sf = square feet

<sup>a</sup> Solid waste generation rates provided in the LASED Final EIR, May 2001.

<sup>b</sup> The 2007 EIR Addendum evaluated a greater number of cinema seats (13,350 seats) than permitted within the LASED Specific Plan area (3,780 seats). While this Addendum corrects the overage, the correct number of seats is applied to both the Approved Project and the Revised Project. As such, no credit was taken for the additional cinema seats analyzed in the 2007 EIR Addendum.

<sup>c</sup> Under the Approved Project, Hotel Meeting/Ballroom floor area was estimated to be 10% of the total hotel floor area in the LASED.

<sup>d</sup> Generation factor derived from the October 1996 Universal City Final Draft EIR.

Source: Matrix Environmental, June 2009.

However, as with the Approved Project, construction and demolition waste would be minimized and recycled to the extent practicable. While construction waste would increase under the Revised Project, sufficient inert landfill capacity is available, and thus, the Revised Project would not substantially worsen construction-related solid waste impacts.

With regard to solid waste generated during operations, the Revised Project's proposed changes to the development program would change the estimated amount of solid waste generated within the LASED. As shown in Table 15, the Revised Project would generate approximately 24,827 pounds per day (or 4,531 tons per year), which is approximately 2,802 pounds per day (511 tons per year) more than the Approved Project. As such, the Revised Project would increase the demand for disposal capacity at landfills (i.e., a 12.7 percent increase in the daily and annual generation). However, the Revised Project's annual solid waste generation would represent approximately 0.4 percent of the remaining daily permitted intake at the Sunshine Canyon Landfill and 1.2 percent of the remaining daily permitted intake at the Chiquita Canyon Landfill, assuming that all of the daily solid waste went to one landfill or the other, which is an unlikely scenario.<sup>13</sup> In terms of combined capacity, the Revised Project would represent 0.3 percent of the combined remaining daily permitted intake of these landfills. Additionally, the Revised Project would implement the same mitigation measures, as applicable, recommended in the Final EIR, which would further reduce any potential incremental impacts related to solid waste. Thus, 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.

### **c. Mitigation Measures**

The Mitigation Measures that are identified in the Final EIR, Addendums, and the adopted MMRP to reduce the quantity of solid waste generated during construction and operation (Mitigation Measures IV.J.3-1 through IV.J.3-3) would also apply to the Revised Project. No additional mitigation measures are required due to the development of the Revised Project.

### **d. Conclusion**

Overall, the Revised Project would not introduce new significant impacts or substantially increase the severity of previously identified impacts with regard to solid waste. Thus, the environmental implications of the revised Project would be consistent with those analyzed under the Approved Project.

---

<sup>13</sup> Based on remaining daily intake of 1,054 tons for the Chiquita Canyon Landfill and a remaining daily intake of 3,498 tons at the Sunshine Canyon Landfill. Based on the Los Angeles Countywide Integrated Waste Management Plan – 2007 Annual Report. Available at: [http://dpw.lacounty.gov/swims/Upload/2007%20CIWMP%20Annual%20Report\\_5343.pdf](http://dpw.lacounty.gov/swims/Upload/2007%20CIWMP%20Annual%20Report_5343.pdf). Accessed June 23, 2009.

### **III. Environmental Impact Analysis**

---

#### **K. Geology/Seismic Hazards**

##### **1. Approved Project**

The Approved Project involves the development of various land uses across all or parts of six City blocks. Parking for the Approved Project is provided in a combination of surface lots as well as aboveground and subterranean structures. The Approved Project would potentially expose employees, visitors, and residents to on-site seismic hazards. However, with the implementation of identified mitigation measures, the Approved Project would be designed so that there would no increased threat of exposing people, property, or infrastructure to geotechnical or seismic hazards. In addition, the Approved Project is not subject to any greater seismic risk than any other site within the Central City subregion of Los Angeles. Therefore, with implementation of the adopted mitigation measures, any potential geologic or seismic impacts would be reduced to less than significant levels.

As a portion of the LASED (i.e., the Figueroa Central and Figueroa South Subareas) is located inside the boundary of the State- and City-designated former Downtown Los Angeles Oil Field, the potential for subsidence is present. However, with the implementation of the adopted mitigation measures, potential impacts related to subsidence with the Approved Project would be reduced to a less than significant level.

##### **2. Revised Project**

The Revised Project involves changes that increase the floor area and building heights within the Olympic North Subarea, as well changes that increase the size of the Olympic North Subarea, the LASED Specific Plan area, and the LASED area as a whole. Parking for the Revised Project would continue to be provided in a combination of surface lots as well as aboveground and subterranean structures. 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. As such, the Revised Project would be subject to increased geologic and seismic hazards during construction than the Approved Project. Nonetheless, this increase would be incremental (i.e., would not constitute a substantial increase in construction hazard risk) 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 of the other remaining subareas. As such, the Revised Project would not create any new impacts with respect to geology or seismic hazards during construction nor increase the severity of any previously identified impacts. Therefore, construction impacts on geology and seismic hazards would be similar to those of the Approved Project, and less than significant, as is the case with the Approved Project.

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 residents, employees, and visitors to geologic and seismic hazards during operation of the Revised Project. However, as with the Approved Project, the Revised Project would implement mitigation measures to reduce geologic and seismic impacts to less than significant levels. As mentioned above, although portions of the LASED are located within a former oil field, the Olympic North Subarea is not located within this former oil field. Thus, increasing both the amount of development, as well as the physical size of the subarea would not increase the potential for subsidence to occur when compared to the Approved Project. The Revised Project would not increase development on any of the other remaining subareas and would reduce the amount of permitted development on Development Sites 1 and 2. As such, the Revised Project would not create any new impacts with respect to geology or seismic hazards during operation, nor would the Revised Project increase the severity of any previously identified impacts. 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.

### **3. Mitigation Measures**

The Mitigation Measures that are identified in the Final EIR, Addendums, and the MMRP to reduce potential geologic and seismic hazards to a less than significant level (Mitigation Measures IV.K-1 through IV.K-4) would also apply to the Revised Project. No additional mitigation measures are required due to the development of the Revised Project.

## 4. Conclusion

Overall, the Revised Project would not introduce new significant impacts or substantially increase the severity of previously identified impacts with regard to geology or seismic hazards. Thus, the environmental implications of the Revised Project would be consistent with those analyzed under the Approved Project.



### **III. Environmental Impact Analysis**

---

#### **L. Architectural/Historic Resources**

##### **1. Approved Project**

The Approved Project involves the development of various land uses across all or parts of six City blocks. More specifically, the Approved Project involves a mixed-use development providing retail/entertainment/restaurant, office, hotel and residential uses.

There are no historic resources located within the LASED. Three properties in the vicinity were concluded to be eligible or appear eligible for federal, State, or local designation as historic resources under CEQA, namely the Variety Arts Center, Petroleum Building, and Hotel Figueroa. Construction activities associated with the Approved Project do not result in any significant impacts to these historic resources. With regard to operation, the Approved Project incorporates project design features to ensure that visual access to these three structures is maintained. Additionally, the Approved Project has an architectural style and character that is visually compatible with the Variety Arts Center. Furthermore, the Approved Project has no physical or indirect impacts on the Petroleum Building and the Hotel Figueroa. As such, the Approved Project has less than significant impacts on these buildings and impacts are less than significant with respect to architectural and historic resources. In addition to historic resources, the Final EIR and subsequent Addendums identified the potential for construction to encounter previously unidentified paleontological, archaeological, and/or cultural resources. However, mitigation measures were identified to reduce potential impacts to these resources to a less than significant level.

##### **2. Revised Project**

The Revised Project involves changes to the land use mix, increases the floor area as well as building heights and massing within the Olympic North Subarea as compared to the Approved Project. The Revised Project would be developed on the Olympic North Subarea in accordance with the same development standards as the Approved Project, with the exception of increasing both the size of the Olympic North Subarea and the maximum tower height permitted within the Subarea. Under the Approved Project, no historic resources were identified within the LASED. The Variety Arts Center, Petroleum Building, and Hotel Figueroa were the only resources identified as eligible or potentially

eligible for designation as historic resources under CEQA in the vicinity of the LASED. The Revised Project's increase in the size of the Olympic North Subarea, increase in the maximum tower height on the Subarea, and increase in the overall development permitted within the LASED would not result in impacts to these identified historic resources. To accommodate the proposed development, the Revised Project would require the demolition of one additional structure (a single-story office building) north of the existing Olympic North Subarea. However, this structure was not identified as being eligible as historic resources in the Final EIR or subsequent Addendums. As such, the Revised Project would not create any new impacts to the identified historic resources nor increase the severity of previously identified impacts. Additionally, with regards to previously identified paleontological, archaeological, and/or cultural resources, similar to the Approved Project, the Revised Project would result in a less than significant impact to these resources with the implementation of the same mitigation measures as the Approved Project. Thus, as with the Approved Project, the Revised Project's impacts with respect to architectural/historical resources would be less than significant.

### **3. Mitigation Measures**

Although impacts to architectural/historic resources would be less than significant, mitigation measures were identified in the Final EIR to protect against the destruction of archaeological or paleontological resources that may be encountered during construction and to further protect historical resources. The Mitigation Measures that are identified in the Final EIR, subsequent Addendums, and the MMRP (Mitigation Measures IV.L.3-1 through IV.L.3-2) would also apply to the Revised Project. No additional mitigation measures are required due to the development of the Revised Project.

### **4. Conclusion**

Overall, the Revised Project would not introduce new significant impact or substantially increase the severity of previously identified impacts with regards to architectural/historic resources. Thus, the environmental implications of the Revised Project would be consistent with those analyzed under the Approved Project.

## **IV. Other Environmental Considerations**

---

### **A. Growth Inducing Impacts of the Revised Project**

The analysis of the Approved Project's growth inducing impacts, as presented in the Final EIR and subsequent Addendums, concluded that since the Approved Project would be developed on all or portions of six city blocks in downtown Los Angeles, the Approved Project would not involve any substantial extension of infrastructure such as roads or utilities nor would it open up undeveloped areas to new development. Furthermore, while it is anticipated that the new employment opportunities associated with the Approved Project would be filled primarily by current area residents, the new employment opportunities may lead some people to relocate to the area to be nearer their jobs, thereby creating some demand for additional housing in the area. The Final EIR and subsequent Addendums also concluded that the influx of Project patrons may create demand for additional retail and entertainment services in the area. Further development in the area may affect local service and infrastructure systems, although such projects could potentially be required to upgrade these systems as needed.

The Final EIR and subsequent Addendums further concluded that the Approved Project and any development that it induces, either directly or indirectly, would contribute to the ongoing redevelopment of the area around STAPLES Center and the Los Angeles Convention Center, as envisioned in numerous City plans and policies. Elements of the Approved Project, such as the proposed convention center hotel and retail/restaurant/entertainment facilities, would also enhance the ability of the Convention Center to attract new and larger meetings, conventions, and expositions. This activity in turn could induce additional growth which would reinforce the visibility and desirability of downtown as a center of concentrated activity and as such, would also contribute to the redevelopment of a previously deteriorating area of downtown.

The incremental increase in office and broadcasting/production uses and overall development under the Revised Project would be consistent with and reinforce the current growth patterns of the downtown area. Furthermore, the Revised Project's increased development would not require a substantial extension of infrastructure such as roads or utilities that could, in turn, induce substantial population growth. Thus, as is the case with the Approved Project, the Revised Project is not anticipated to result in significant growth inducing impacts.

## **B. Significant Irreversible Environmental Changes**

The Approved Project, as concluded in the Final EIR and subsequent Addendums would necessarily consume limited, slowly renewable and non-renewable resources. This consumption would occur during the construction phase of the Project and would continue throughout its operational lifetime.

Implementation of the Revised Project, as is the case with the Approved Project, would require the commitment of natural resources and land. Implementation of the Revised Project would increase on-site office and broadcasting/production development, and as such, impacts to nonrenewable or slowly renewable resources would be incrementally, but not substantially, increased. Furthermore, construction of the Revised Project, as is the case with the Approved Project, would require a commitment of resources that would include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and people to and from the site. During operation, the Revised Project, as is the case with the Approved Project, would require the long-term commitment of non-renewable energy resources such as electricity and natural gas, as well as petroleum-based fuels required by the increased number of vehicle trips. In addition, development of the Revised Project is not anticipated to result in the addition of new infrastructure not already contemplated by the Approved Project. The Revised Project, represents an essentially irreversible commitment of land uses that would transform the existing uses on-site in response to local planning goals and policies, as is the case with the Approved Project. The commitment of resources required for the type and level of the development would limit the availability of these resources for future generations for other uses during the life of the Revised Project, as is the case with the Approved Project. As such, development of the Revised Project would not result in substantial changes to the significant irreversible environmental effects of the Approved Project.

## **V. List of Preparers**

---

### **A. Lead Agency**

City of Los Angeles  
Department of City Planning  
201 N. Figueroa St, 4<sup>th</sup> Floor  
Los Angeles, CA 90012

### **B. Applicant**

L.A. Arena Land Company, LLC  
800 West Olympic Boulevard, Suite 305  
Los Angeles, CA 90015

### **C. Environmental Impact Report Preparation**

#### **Environmental Consultant**

Matrix Environmental  
6701 Center Drive, Suite 900  
Los Angeles, CA 90045

- Bruce Lackow, President
- Shawn Gaver, Senior Environmental Planner
- Mark Hagmann, Air and Noise Specialist
- Jeremy Buck, Graphics Specialist
- Natasha Mapp, Production Specialist

---

## **Architectural Consultant**

Gensler Architects  
2500 Broadway, Suite 300  
Santa Monica, CA 90404

- Marty Borko, Architect
- John Adams, Architect

## **Land Use Consultant**

Latham & Watkins, LLP  
355 South Grand Avenue  
Los Angeles, CA 90071-1560

- Robert Smith, Land Use Attorney

## **Traffic Consultant**

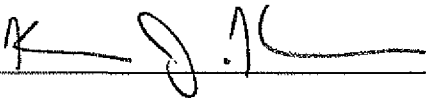
The Mobility Group  
18301 Von Karman, Suite 580  
Irvine, CA 92612

- Michael Bates, President

V. List of Preparers

---

The City of Los Angeles Planning Department has reviewed this Addendum and has determined it to be prepared in accordance with all CEQA requirements and in so doing adequately addresses the potential environmental impacts of the Revised Project. Therefore, this Addendum is adequate under CEQA and can be used by an agency making a decision on the Project.



---

Kevin Keller  
Los Angeles Department of City Planning

8/31/09  
Date