SECOND ADDENDUM TO THE CERTIFIED EIR

The Grand Avenue Project

Los Angeles, California

State Clearinghouse No. 2005091041

Prepared for:

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I. INTRODUCTION

Project Information

Project Title: Second Addendum to Final Environmental Impact Report for The Grand Avenue Project

Project Location: The portion of the downtown area, in which the Grand Avenue Project is located, is generally bounded by Cesar E. Chavez Avenue on the north, Spring Street on the east, Fifth Street on the south, and Hope Street to the West

Project Applicant: Grand Avenue L.A., LLC

Pursuant to the California Environmental Quality Act (CEQA), a Final Environmental Impact Report (EIR) was prepared and certified for The Grand Avenue Project in November 2006 (SCH No. 2005091041). The Final EIR document is hereinafter referred to as the Certified EIR.

This document is an addendum to the Final EIR and has been prepared to evaluate potential environmental effects that may be associated with proposed changes in the previously-approved The Grand Avenue Project (or "Approved Project"). These modifications are related to potential changes in development plans for Parcel Q (described in full in Section IV., Environmental Impact Analysis, below).

Final EIR

The Final EIR for the Approved Project analyzed the following three components to be located in downtown Los Angeles:

(1) The now completed 16-acre Civic Park (renamed Grand Park) that expands upon the existing Civic Center Mall that connects Los Angeles' City Hall to Grand Avenue;

(2) Streetscape improvements along Grand Avenue between Fifth Street and Cesar E. Chavez Avenue. Grand Avenue Improvements between 2nd Street and 3rd Street will be completed with development of Parcels L and M-2, which are currently under construction.; and

(3) Development of five parcels, which are referred to as Parcels Q, W-1, W-2, L, and M-2. Parcels L and M-2 are currently under construction.

Two development options were also analyzed in the Certified EIR:

(1) The Project with County Office Building Option and

(2) The Project with Additional Residential Development Option.

Under the Project with County Office Building Option, up to 2,060 residential units, including up to 412 affordable units; up to 449,000 square feet of retail floor area; up to 275 hotel rooms; and a County Office Building containing up to 681,000 square feet, would be constructed.

Under the Project with Additional Residential Development Option, up to 2,660 residential units, including 532 affordable units; 449,000 square feet of retail floor area; and up to 275 hotel rooms would be constructed. The County Office Building would not be constructed under the Project with Additional Residential Development Option. The total floor area to be developed under both options is 3.6 million square feet. The Final EIR analyzed all potential environmental impacts and provided mitigation measures to reduce potential impacts to a less than significant level.

The Certified EIR for the Grand Avenue Project evaluated the potential environmental impacts of a project that would be developed in a series of phases. Initially, the Approved Project was to involve the development of Parcel Q concurrently with the development of the Civic Park. Parcels W-1/W-2, L and M-2 would be developed in later phases, along with the completion of the Grand Avenue streetscape program, from Fifth Street to Second Street, and from Temple Street to Cesar E. Chavez Avenue.

2010 Addendum

In July of 2010, an Addendum was prepared and approved that addressed two proposed changes to the Approved Project, consisting of: (1) proposed changes to development of Parcels L and M-2; and (2) proposed changes to the original schedule for implementation of the overall development. These changes are hereinafter referred to as the "2010 Addendum". Specifically, the 2010 Addendum revised the Conceptual Plan for Parcels L and M-2 to reflect a different mix of land uses and a different site configuration than was provided for in the Conceptual Plan for the Approved Project. The 2010 Addendum included a museum facility, along with residential and retail uses and associated parking facilities, on Parcels L and M-2. Inclusion of the museum facility was proposed to be offset by reductions in residential units and retail square footage compared to the Approved Project.

The 2010 Addendum concluded that inclusion of the museum use would not increase the overall floor area of development on Parcels L and M-2 when compared to the Approved Project. With respect to the planned residential and retail uses on these parcels, the previous approvals granted by the City of Los Angeles for the Grand Avenue Project for development of Parcels L and M-2 permitted such uses under existing zoning. Further, the 2010 Addendum did not change any of the land uses and development parameters with respect to any other aspect of the Approved Project, including the Civic Park, Grand Avenue Streetscape Program and development of Parcels Q, W-1 and W-2. Accordingly, the 2010 Addendum concluded that these changes to The Grand Avenue Project would not cause any new significant impacts.

Purpose of this Addendum

The purpose of this Addendum is to address potential environmental impacts associated with proposed modifications to the Approved Project. In particular, this Addendum addresses potential changes in the location of approved towers on Parcel Q and the overall net square footage of proposed retail and restaurant uses. Other than the changes set forth in this Addendum and described below under Section II., Project Description, all aspects of the Approved Project would remain the same as originally analyzed in the Certified EIR and 2010 Addendum. These changes are hereinafter referred to as the "Revised Project".

Pursuant to Section 15164 of the State CEQA Guidelines, the lead 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 the preparation of a subsequent EIR have occurred. The scope of this Addendum focuses on the environmental effects that are associated with the specific changes that would take place due to the modifications. Additional discussions on the rationale for preparing an Addendum to the Final EIR for the Approved Project are included in Section III., Rationale for Addendum.

Organization of Addendum

This Addendum is organized into five sections as follows:

I. Introduction: This section provides introductory information such as the project title, the project applicant and the lead agency for the Proposed Project.

II. Project Description: This section provides a detailed description of the environmental setting and the Proposed Project, including project characteristics and environmental review requirements.

III. Criteria for Using an Addendum to a Certified EIR/Executive Summary: This section contains the rationale for preparing an Addendum pursuant to Section 15164 of the State CEQA Guidelines, including an executive summary of the findings and determinations supporting a decision to use an Addendum.

IV. Environmental Impact Analysis: This section contains a brief summary of the environmental impacts disclosed in the prior EIR for each environmental issue area. The evaluation includes an analysis of how any of the environmental factors may be altered as a result of the proposed changes.

V. Preparers of Addendum and Persons Consulted: This section provides a list of lead agency personnel, consultants and other governmental agencies that participated in the preparation of the Addendum.

II. PROJECT DESCRIPTION

PROPOSED CHANGES

Changes to Development on Parcel Q

Approved Project

For the development of Parcel Q, the Certified EIR for the Approved Project evaluated a program consisting of the following components: 1) up to 500 residential units, including 100 apartment units, 2) 275 room hotel with 15,000 square feet of meeting space, and 3) retail uses comprising approximately 284,000 square feet, including a breakdown of commercial as detailed in Table II-1, Parcel Q Land Use Program Comparison, below.

The Conceptual Plan for the Approved Project included two towers - a high-rise tower containing hotel and residential uses and a mid-rise tower containing residential uses. The height envelope studied in the Certified EIR for the Approved Project anticipated the high rise tower rising to a height of up to 750 feet above Grand Avenue near the corner of Grand Avenue and Second Street, and the mid-rise building to a height up to 450 feet above Grand Avenue near the corner of Olive Street and First Street. Each of the two towers was anticipated to cover no more than 10% of the site each. Of the remaining 80% of the site, half would include buildings up to 150 feet above Grand Avenue and half would include buildings rising to a height of up to 75 feet above Grand Avenue.

Development of the Approved Project was also anticipated to occur in three construction phases. The initial development phase was to include the simultaneous completion of Civic Park; Grand Avenue streetscape improvements between Second and Temple Streets; and the development of Parcel Q. The second phase was to include the development of Parcels L and M-2 and Grand Avenue streetscape improvements. The third phase was to include the complete development of Parcels W-1/W-2 and Grand Avenue streetscape improvements. The Approved Project studied two possible construction scenarios, an anticipated and accelerated schedule. Specifically, in the event that the overall construction schedule was accelerated, the second phase would overlap part of the first phase, but the duration of each phase would remain at 36-months. In order to account for possible changes in schedule and to analyze worst case construction impacts, the Certified EIR analyzed both construction schedules.

The Approved Project also recommended mitigation measures, compliance measures, and project design features for both construction and operation of the Approved Project to help reduce impacts to a less than significant level, where applicable.

Revised Project

Revised Conceptual Plan

The Revised Project would revise the Conceptual Plan for Parcel Q in the following ways:

1) **Program:** The Revised Project would include the same uses but with a smaller amount of retail/commercial square footage and with a narrower subset of specific retail uses, as detailed in Table II-1, Parcel Q Land Use Program Comparison, below. Specifically, the Revised Project would have approximately 220,000 square feet of retail uses compared with the 284,000 square feet analyzed in the Certified EIR. Also, the Revised Project now proposes roughly 50,000 square feet of office space, whereas, the Approved Project proposed no office space under the Parcel Q land use program. Although the Approved Project did not specify proposed residential unit type, the current residential program is now anticipated to include market rate rental apartments, affordable rental apartments, and condominium units. That current program is reflected in Table II-1 below. Note, however, that for purposes of worst case impact analysis, and to allow flexibility for potential future conversion to condominiums, the impact analysis in this Addendum and the Initial Study Checklist attached as Appendix A evaluated al of these units as if the units are condominiums, which would generate slightly more vehicle trips than would apartment units.

Table II-1
Parcel Q Land Use Program Comparison

Parcel Q	Units	Original Program (2006 EIR)[a]	Revised Program (2013 Update)[b]	% Change
Condominiums	D.U.	400	70	-82.5%
Apartments (Market Rate)	D.U.	-	290	+100%
Apartments (Affordable)	D.U.	100	90	-10%
Hotel	Rooms	275	300	+10%
Retail/Commercial	S.F.	284,000	220,000	-23%
Market	*S.F.*	*53,000*	*10,000*	*-82%*
Retail	*S.F.*	*97,750*	*85,000*	*-13%*
Restaurants	*S.F.*	*42,000*	*85,000*	*+202%*
Event Facility	*Seats*	*250*	-	*-100%*
Health Club	*S.F.*	*50,000*	*40,000*	*-20%*
Office	S.F.	-	50,000	+100%

D.U. – dwelling units; S.F. – square feet

[a] *Condominiums and Market Rate Apartments were grouped together as "Residential Uses" in the Original Program EIR.*

[b] *The Original Program did not identify specific residential unit types. The Revised Program is now detailing specific types of residential units for added clarity. Nevertheless, the CEQA analysis on these units (i.e., traffic) is being conducted as if the units are condominiums, to reflect potential worst case impacts.*

Source: CAJA Environmental Services, LLC, 2014.

2) **Tower Locations:** The Conceptual Plan for the Approved Project anticipated the two towers on Parcel Q to be located at corners of 1st and Olive and 2nd and Grand. The Revised Project still anticipates two towers but relocates the towers to the corners of 1st and Grand and 2nd and Olive, as depicted in Figure II-1, Parcel Q Tower Location Comparison, below.

3) **Height Envelope**: The Revised Project makes slight revisions to the height envelope on Parcel Q that is analyzed for visual/aesthetic impacts. It should also be noted that these revisions are not substantive changes from the original plans but a correction to a discrepancy between the originally described height envelope and the originally proposed plans, which are also applicable to current plans. Tower heights in the height envelope remain the same as in the Original Project (750 feet and 450 feet above Grand Avenue). However, the height envelope has been revised to anticipate slightly larger tower floor plates that occupy up to 15% of the site each (rather than 10% each). Similar to the height envelope analyzed in the Certified EIR, lower buildings are assumed to occupy the remainder of the site, with half of the remaining site area up to 150 feet above Grand Avenue and the other half up to 85 feet above Grand Avenue. These revisions to the height envelope are being made to ensure that the analysis includes the possibility that towers will exceed the footprints described in the Approved EIR. It should be noted that height envelope analyzed for EIR purposes is generated as a worst case analysis for purposes of analyzing potential visual/aesthetic impacts. Other development limitations and design parameters set forth in the project DDA, land use entitlements, and approved plans will continue to further limit building forms, height, and site coverage. For example, the height envelope analyzed includes buildings of varying heights on 100% of the site to provide for a conservative impact analysis. However, as a public plaza is required as part of the project DDA and approved plans, buildings will not occupy the entire site.

4) **Phasing**: The order of phasing and the number of phases of development has not been changed since certification of the EIR. The Civic Park was completed as the first phase of development and Parcels L and M-2 are currently under construction as two separate but overlapping phases of development. The next phase is anticipated to be construction of Parcel Q within one phase of construction as originally programmed. Remaining phases include one additional phase on the remainder of Parcel L that is not currently under construction, and the construction of Parcels W-1/W-2.

5) **Access:** The Revised Project now includes minor changes to certain driveways on Parcel Q. In particular, the originally proposed driveway on First Street remains in the same location, but will now be one-way ingress solely, compared to the previous two-way (ingress and egress) driveway analyzed in the Approved Project. The originally proposed two-way driveway on Olive Street remains in the same location. Turn restrictions of these two previously mentioned driveways remain as specified for the Approved Project. On Second Street, the two previously proposed driveways have been replaced with one driveway, which serves the same function. The remaining originally proposed driveway on Lower Grand Avenue will remain but will now only

serve residential uses. Lastly, the originally proposed commercial exit-only driveway on Lower Grand Avenue has now been eliminated.

It should be noted that the project DDA, as currently being amended, includes a Scope of Development that is less than the maximum development program being studied in the Revised Project. The less intensive program in the DDA Scope is the currently anticipated development program. However, in order to provide a more comprehensive "worst case" analysis and to afford more flexibility in proceeding with the development in the future, the Revised Project includes a larger program that equates to the amount of traffic trips associated with the program approved in the Certified EIR.

Other than as described above, the Revised Project would not change any of the land uses and development parameters with respect to any other aspect of the Approved Project, including the Civic Park, Grand Avenue Streetscape Program, and development of Parcels W-1 and W-2. Lastly, all mitigation measures, compliance measures, and project design features proposed under the Approved Project would remain for the Revised Project.

Figure II-1 – Parcel Q Tower Location Comparison

III. CRITERIA FOR USING AN ADDENDUM TO A CERTIFIED EIR

Criteria

Section 15164 of the CEQA Guidelines provides the authority for preparing an Addendum to a previously certified Environmental Impact Report or adopted Negative Declaration. Specifically, Section 15164 states:

> *(a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*
>
> *(b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.*
>
> *(c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.*
>
> *(d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.*
>
> *(e) 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. The explanation must be supported by substantial evidence.*

Section 15162 of the CEQA Guidelines provides the scenarios for preparing a subsequent EIR and Negative Declaration after an EIR has been certified. Consistent with Section 15162, the analysis in this Addendum demonstrates that 1) the Revised Project would not involve substantial changes that would result in new significant environmental effects or a substantial increase in the severity of significant effects previously identified in the Certified EIR, 2) that substantial changes with respect to the circumstances under which the Revised Project would be undertaken that would result in new significant environmental effects or a substantial increase in the severity of significant effects previously identified in the Certified EIR have not occurred, and 3) that new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, does not exist.

As will be discussed in detail below, the modifications to the Approved Project are relatively minor and would not result in any new significant environmental impacts. The analysis contained in this Addendum demonstrates that the Revised Project is consistent with the size, scale, and massing of the Project analyzed in the Certified EIR and all of the impact issues previously examined in the Final EIR would remain unchanged with implementation of the proposed modifications.

Executive Summary

In order to implement revisions to the previously Certified EIR, analyses must be presented that support the determination that proposed changes to the Approved Project would not involve new significant environmental effects or result in a substantial increase in the severity of previously identified significant effects, which would call for, as provided in Section 15162 of the State CEQA Guidelines, the preparation of a Subsequent EIR

In order to adequately scope out additional analysis, a newly revised Initial Study was prepared that discussed potential environmental impacts attributable to changes to development planned for Parcel Q. The Initial Study is attached to this Addendum at Appendix A. As part of the Initial Study, a traffic memorandum was prepared for the Revised Project that looked at potential changes in trip generation as a result of the modified development since traffic trips are potential causes of traffic impacts. The memorandum, titled Traffic Memorandum to LADOT, was prepared by The Mobility Group and is attached as Appendix A to the Initial Study. The Traffic Memorandum concluded that potential impacts under the Revised Project would be similar or less than those under the Approved Project and no changes to mitigation measures were necessary to reduce any new significant impacts.

Consistent with CEQA Section 15162, the analysis in this Addendum and attached Initial Study demonstrates that:

1. The Revised Project would not involve substantial changes that would result in new significant environmental effects or a substantial increase in the severity of significant effects previously identified in the Certified EIR. The changes proposed to the Approved Project are relatively minor and would not result in any new significant environmental impacts. The analysis contained herein demonstrates that the revised project is consistent with the size, scale, and massing of the Approved Project and the impact issues previously examined in the Certified EIR would remain unchanged.

2. Substantial changes with respect to the circumstances under which the Revised Project would be undertaken that would result in new significant environmental effects or a substantial increase in the severity of significant effects previously identified in the Certified EIR have not occurred. In particular, the existing Project Site has not been altered or changed in a way that would create a substantial increase in significant effects. Further, potential changes to the surrounding environment since the adoption of the Certified EIR was analyzed in the report attached as Appendix A to the Initial Study with respect to related projects and existing traffic in the area. No significant changes were identified concerning those matters. In particular, the Certified EIR concluded that all of the impacted intersections would continue to operate at LOS D or better, except for two that would operate at LOS E in the PM peak hour, and two that would operate of LOS F in the PM peak hour. As concluded in the Post-EIR Initial Study, traffic impacts identified for the Revised Project would be similar or less than those identified in the Approved

Project, which concludes that the circumstance under which the Revised Project would be undertaken has not been altered from that of the Certified EIR.

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete does not exist. There have been no changes in the mitigation measures required for the Project. As discussed in Appendix A, Initial Study, implementation of mitigation measures identified in the Certified EIR would apply to the Revised Project and would help reduce all potential impacts to a less than significant level. Additionally, no changes in the project alternatives studied in the Certified EIR are necessary to address a new significant impact caused by the Revised Project.

Therefore, the analysis of the Revised Project supports the determination that the proposed changes to the Project would not involve new significant environmental effects or result in a substantial increase in the severity of previously identified significant effects which would call for the preparation of a Subsequent EIR (or recirculated EIR).

The remaining balance of the analysis below looks at potential impacts attributable to those impact areas not studied in the Certified EIR and those impact categories that need to be further studied in this Addendum as discussed in the Post-EIR Initial Study. The proposed Addendum will address Aesthetics and Greenhouse Gas Emissions. The relocation of two towers on Parcel Q warrants further discussion of Aesthetics in this Addendum. That discussion is provided in this Addendum for full disclosure so the public and decision-makers can consider and evaluate this potential impact, even though Senate Bill No. 743, effective as of January 1, 2014, amended CEQA to provide that the aesthetics of a project located within one-half mile of a "transit priority area" (which may apply to the Revised Project) shall not be considered a significant impact under CEQA). Also, Greenhouse Gas Emissions was not originally analyzed in the Draft and Final EIR. Further, this Addendum will analyze potential impacts associated with the change in the phasing of development on Parcel Q, as well as a proposed change in the timing of certain traffic mitigation measures.

Based on the analysis in this Addendum, the Revised Project would result in little to no changes with respect to the studied environmental impact areas. See Table III-1 for a comparison of the effect of the Revised Project in all impact areas. Therefore, an Addendum to the previously certified EIR serves as the appropriate form of documentation to meet the statutory requirements of CEQA.

Table III-1
Comparison of Environmental Findings between the Approved Project and the Revised Project

Environmental Issue	Approved Project	Revised Project	Conclusion
Aesthetics			
Views	Significant	Significant	No change
Visual Character	LTS/Mitigation	LTS/Mitigation	No change
Light and Glare	LTS/Mitigation	LTS/Mitigation	No change
Shade/Shadow	LTS/Mitigation	LTS/Mitigation	No change
Air Quality			
Consistency with AQMP	LTS	LTS	No change
Construction	LTS/Mitigation	LTS/Mitigation	No change
Operation	Significant	Significant	No change
Toxic Air Contaminants	Significant	Significant	No change
Greenhouse Gas	--- [1]	LTS/Mitigation	---
Cultural Resources			
Historic	LTS/Mitigation	LTS/Mitigation	No change
Archaeological	LTS/Mitigation	LTS/Mitigation	No change
Paleontological	LTS/Mitigation	LTS/Mitigation	No change
Hazards and Hazardous Materials			
Transport, Use, or Disposal	LTS/Mitigation	LTS/Mitigation	No change
Release into the Environment	LTS/Mitigation	LTS/Mitigation	No change
Within ¼ mile of a School	LTS/Mitigation	LTS/Mitigation	No change
List of Hazardous Materials Sites	LTS/Mitigation	LTS/Mitigation	No change
Within 2 miles of a Public Airport	NI	NI	No change
Within vicinity of a Private Airstrip	NI	NI	No change
Land Use/Planning			
Physically Divide Community	LTS/Mitigation	LTS/Mitigation	No Change
Conflict with Land Use Plan	LTS	LTS	No change
Conflict with Habitat Conservation	NI	NI	No Change
Noise			
Construction Noise	LTS/Mitigation	LTS/Mitigation	No Change
Operation Noise	LTS/Mitigation	LTS/Mitigation	No Change

Table III-1
Comparison of Environmental Findings between the Approved Project and the Revised Project

Environmental Issue	Approved Project	Revised Project	Conclusion
Airport Land Use Plan	NI	NI	No Change
Population and Housing			
Induce Population Growth	LTS	LTS	No change
Displace Existing Housing	LTS	LTS	No Change
Displace People	LTS	LTS	No Change
Public Services			
Fire	LTS/Mitigation	LTS/Mitigation	No Change
Police	LTS/Mitigation	LTS/Mitigation	No Change
Schools	LTS/Mitigation	LTS/Mitigation	No change
Recreation	LTS/Mitigation	LTS/Mitigation	No Change
Libraries	LTS/Mitigation	LTS/Mitigation	No change
Recreation			
Increase Use	LTS/Mitigation	LTS/Mitigation	No Change
Expansion of Existing Facilities	LTS/Mitigation	LTS/Mitigation	No change
Transportation/Traffic			
Trip Generation	Significant	Significant	No change
Site Access and Circulation	LTS/Mitigation	LTS/Mitigation	No change
Parking	LTS/Mitigation	LTS/Mitigation	No change
Adopted Policies	LTS	LTS	No change
Utilities			
Wastewater	LTS/Mitigation	LTS/Mitigation	No change
Water	LTS/Mitigation	LTS/Mitigation	No change
Solid Waste	LTS/Mitigation	LTS/Mitigation	No change
Energy	LTS/Mitigation	LTS/Mitigation	No change

Notes:
LTS = Less than significant
LTS/Mitigation = Less than significant with mitigation
NI = No impact

[1] *The Certified EIR did not address greenhouse gas emissions associated with the Approved Project. Global climate change was not routinely analyzed prior to AB32, effective in 2007, and the CEQA Guidelines did not address greenhouse gases or global climate change at the time the Final EIR for the Approved Project was certified.*

IV. ENVIRONMENTAL IMPACT ANALYSIS

AESTHETICS AND VISUAL RESOURCES

Visual Quality

Certified EIR

In the Certified EIR, the existing parking structure would be removed and under the Conceptual Plan the development would be designed across multi-levels, incorporating a central plaza space, outdoor terraces, large amounts of landscaping and outdoor pools and terraces for the hotel, restaurant, and residential uses. Outdoor and indoor spaces would be blended to take advantage of the Southern California climate.

Because of the high quality architecture characterizing the downtown Los Angeles high-rise towers, individual structures and the combined structures, which form the surrounding skyline, are also considered aesthetic resources and/or distinguished buildings. Some of the surrounding uses identified in the Certified EIR include the Grand Promenade Tower, Wells Fargo Tower, KMPG Tower, One California Plaza Tower, Two California Plaza Tower, Gas Company Tower, US Bank Tower, Biltmore Tower, Mellon Bank, Bank of America Plaza, City National Bank, Walt Disney Concert Hall, Los Angeles Music Center, Colburn School of Performing Arts, Dorothy Chandler Pavilion, and Cathedral of our Lady of the Angels at Grand Avenue and Second Street.

With the implementation of the height overlay, two tower buildings would comprise approximately 20 percent of the total parcel. The remainder of the site would be developed with lower buildings and open space, including a large central plaza accessible to the public. The Certified EIR found that the variation in building heights imposed by the height overlay would create a stepped effect and would enhance the dramatic effect of the single highest building, particularly since the higher tower would be set along Grand Avenue at the crest of Bunker Hill. The variation in building heights was also found to reduce the overall sense of mass and add visual interest to the skyline. Additionally, the Certified EIR found that the high-rise tower created a stepped visual affect when coupled with the Project's adjacent low-rise development along Second Street, which would reduce visual contrast between the Project and the adjacent school.

Parcel Q, under the Conceptual Plan identified in the Certified EIR, would also have its own outdoor public open space with pedestrian connections to Grand Avenue, First Street, and by a pedestrian bridge over Olive Street to Parcels W-1/W-2. The pedestrian-oriented open space would include a landscaped plaza, numerous seating areas, integrated public art and/or fountains, and a collection of gathering places. The outdoor orientation of the development on Parcel Q, under the Conceptual Plan and Certified EIR,

would also be maximized on multiple floor levels through the use of patios, elevated walkways, and roof terraces.

It was found that development on Parcel Q and the proportion of open space to tower development, under the Conceptual Plan, would be consistent with other high-rise development in the area, including California Plaza at Grand Avenue and Wells Fargo Center at Third Street and Grand Avenue. As with the Project, these developments feature attractive high-rise buildings setback from the adjoining public street in a stepped building design, with extensive landscape features, including the Water Court in California Plaza, that are integrated into the adjacent public sidewalk.

The Certified EIR also stated that the anticipated modern design of the Project with County Office Building Option would be consistent with the quality of surrounding visually prominent buildings, including MOCA (Museum of Contemporary Art), the Colburn School, Walt Disney Concert Hall, the Dorothy Chandler Pavilion, and the Cathedral of Our Lady of Angels. The proposed development of Parcel Q would remove the existing open parking structure and, with its public plaza and sidewalks integrated into the Grand Avenue streetscape, would contribute to the existing visual character of city's surrounding cultural and high-rise core. Overall, development under the Certified EIR would not significantly contrast with existing, visually prominent buildings. Therefore, visual quality impacts associated with the development of Parcel Q were found to be less than significant under the Approved Project.

Revised Project

Construction

Similar to the Approved Project, although construction activities would reduce the existing visual attributes of Parcel Q during the construction phases, this parcel does not currently contain any aesthetic features that contribute to the existing visual character of the area. The mitigation measures set forth in the Certified EIR with respect to construction activity within the parcels would apply to all development associated with the Revised Project on Parcel Q. As such, the Revised Project would not result in any new significant impacts or substantial increase in the severity of previously-identified impacts in the Certified EIR with respect to construction activities with inclusion of the previously identified mitigation measures for construction under the Certified EIR.

Operation

Under the Revised Project, the existing parking structure would be removed and the development would be designed across multi-levels, incorporating a central plaza space, outdoor terraces, large amounts of landscaping and outdoor pools and terraces for the hotel, restaurant, and residential uses.

In addition to the aesthetic resources and/or distinguished buildings discussed in the Certified EIR, several other projects have subsequently been built near the Revised Project Site since the certification of the EIR in 2006. Some of these uses include the Broad Museum near the corner of Grand Avenue and

Second Street, an expansion to the existing Colburn School of Performing Arts, and the Approved Project's apartment building structure on Parcel L/M.

With the implementation of the height overlay identified above for the Revised Project, the proposed high-rise tower would be an icon or centerpiece for the block similar to the Approved Project. The Revised Project for Parcel Q also includes a second tower to be located nearer to Olive Street and Second Street. The two tower buildings would comprise up to 30 percent of the total parcel as compared to the 20 percent under the Approved Project. The remainder of the site would be developed with lower buildings and open space, including a large central plaza accessible to the public. Similar to the Approved Project, the variation in building heights imposed by the height overlay would create a stepped effect and would enhance the visual interest of the Downtown and Bunker Hill skyline. The variation in building heights would also reduce the overall sense of mass and add visual interest to the skyline.

Since the Revised Project's high-rise components would still occupy up to 30 percent of the total site, the mass and contrast of the Project would be consistent with surrounding uses, including the adjacent low-rise Colburn School of Performing Arts and its 13-story addition, similar to that of the Approved Project. The outdoor orientation of the development on Parcel Q, under the Revised Project, would also be maximized on multiple floor levels through the use of patios, elevated walkways, and roof terraces. The outdoor public space would also be integrated into the Grand Avenue streetscape similar to the Approved Project.

Development on Parcel Q and the proportion of open space to tower development would be consistent with other high-rise development in the area, including California Plaza at Grand Avenue and Wells Fargo Center at Third Street and Grand Avenue. As mentioned above, these developments feature attractive high-rise buildings, with extensive landscape features, including the Water Court in California Plaza, that are integrated into the adjacent public sidewalk.

Similar to the Approved Project, the anticipated modern design of the Revised Project would also be consistent with the quality of surrounding visually prominent buildings, including MOCA (Museum of Contemporary Art), the Colburn School, The Broad Museum, Walt Disney Concert Hall, the Dorothy Chandler Pavilion, and the Cathedral of Our Lady of Angels. The proposed development of Parcel Q would remove the existing open parking structure and, with its public art and sidewalks integrated into the Grand Avenue streetscape, would contribute to the existing visual character of the city's surrounding cultural and high-rise core.

The proposed design of the towers for the Revised Project would provide the same physical and visual separation between architecturally significant buildings (such as The Broad Museum and Walt Disney Concert Hall) when compared to the Approved Project, which would minimize the potential visual quality impact of the tower buildings. Specifically, the resulting appearance of the Revised Project for local residents and travelers in and around the area of the Project would be shaped by setbacks, the sloped nature of the streets, and the overall architectural design of a high-rise development with low- to mid-rise retail and restaurant uses. Intermittent landscape edges coupled with building facades setback from the

street would soften any visual contrast between existing and proposed buildings. So as to not have an entire street block of high-rise building facades, height variations created by the proposed building overlay would add interest and variation to the skyline and would help the Project to complement neighboring development (e.g., Walt Disney Concert Hall).

Since the proposed development is anticipated to be consistent with the quality and design of surrounding uses and the context of the urban setting, it would not substantially alter, degrade or eliminate the existing visual character of the area. In addition, development would not significantly contrast with existing, visually prominent buildings. Therefore, visual quality impacts associated with the development of the Revised Project would be less than significant.

Furthermore, the Revised Project would remove the existing surface parking lot and would contribute to the existing visual character of the area by raising the site to the Grand Avenue street level and would create a continuous interface with the sidewalk. The Revised Project would therefore not introduce elements that would be incompatible with the character, scale, height, massing, and architectural articulation of existing development. The mitigation measures set forth in the Certified EIR with respect to development activity within the five development parcels would apply to the development associated with the Revised Project on Parcel Q and reduce impacts to a less than significant level. As such, the Revised Project would not result in any new significant impacts or substantial increase in the severity of previously-identified impacts in the Certified EIR with respect to visual quality and aesthetics.

Since the Revised Project would comprise a variety of building heights and configurations, the Revised Project would contribute to the existing visual quality of the Los Angeles Downtown skyline and would be consistent with the variety of building heights and setbacks characterizing the existing skyline. The Revised Project would not substantially alter, degrade or eliminate the existing visual character of the area, including valued existing features, nor would the Revised Project contrast with the visual character of the surrounding area. As such, the Revised Project would not result in any new significant impacts or substantial increase in the severity of previously-identified impacts in the Certified EIR with respect to the Los Angeles Downtown skyline.

Views

Certified EIR

The Certified EIR concluded that the Approved Project, for Parcel Q, would obstruct distant vista views to the north, possibly including the San Gabriel Mountains, from the upper stories of the Museum Tower residential building. This analysis was based on consideration of the following height limits that would apply as a development standard on Parcel Q, as taken from the Certified EIR Project Description:

- Building heights of 1,135 feet above mean sea level would be allowed on 10 percent of the site;
- Building heights of 865 feet above mean sea level would be allowed on 20 percent of the site (approximately 36,000 square feet);

- Building heights of 535 feet above mean sea level would be allowed on 60 percent of the site; and
- Building heights of 460 feet above mean sea level would be allowed on 80 percent of the site.

The Certified EIR included analysis of an overlay configuration that would confine the higher tower on Parcel Q to a small portion (10 percent) of the site, rising to a height of 750 feet above Grand Avenue near the corner of Grand Avenue and First Street. Additionally, the Certified EIR studied the second tower height of up to 450 feet above Grand Avenue, with both towers not exceeding 20 percent of the total site. Overall, the Certified EIR concluded that view blockage impacts to neighboring residential buildings with northerly views of the San Gabriel Mountains and horizon would be significant and unavoidable due to the Approved Project's residential building tower near the corner of Grand Avenue and Second Street. Potential views impacts in a southerly, easterly, and westerly direction were all considered less than significant.

Revised Project

Under the Revised Project, the proposed changes would include the replacement of the event facility and the reduction in health club uses with additional restaurant uses in previously approved smaller buildings on Parcel Q. As discussed above, the Revised Project maintains the maximum tower heights from the Certified EIR but revise the height envelope to accommodate slightly larger tower footprints. Additionally, the proposed two towers under the Revised Project would be located in alternate locations on Parcel Q. This analysis was based on consideration of the following height limits that would apply as a development standard on Parcel Q:

- Building heights of 1,135 feet above mean sea level would be allowed on 15 percent of the site;
- Building heights of 835 feet above mean sea level would be allowed on 30 percent of the site;
- Building heights of 535 feet above mean sea level would be allowed on 60 percent of the site; and
- Building heights of 470 feet above mean sea level would be allowed on 80 percent of the site.
- Buildings that would not exceed 150 and 85 feet above mean sea level would be allowed on remainder of the site (70 percent).
- Two towers proposed would not exceed 30 percent of the total site area.

As discussed above, the tower proposed for the corner of Second Street and Grand Avenue under the Certified EIR will now be proposed for the corner of First Street and Grand Avenue. Similar to the Approved Project, the exchange of existing south-, west-, and east-facing views of high-quality urban development with further views of high quality urban development is an important factor in assessing the magnitude of view blockage. The tower proposed for the northern portion of Parcel Q under the Approved Project will now be proposed for the southern corner of Second Street and Olive Street. The

placement of both towers in new locations would continue the overall skyline view of tall buildings, which is typical of views within the Los Angeles's high-rise core. Similar south-, west-, and east-facing views would continue to be available from the Grand Avenue corridor and other street and sidewalk areas in the City, as discussed below.

West-Facing Views

As it relates to publicly available west-facing views across Parcel Q from Olive Street, the vista of the Walt Disney Concert Hall opens up as the viewer moves from Olive Street toward the west, so that the entire Walt Disney Concert Hall is visible from the intersection of First Street and Grand Avenue. Views are also available near Grand Avenue and Second Street. To note, existing views are better of the Walt Disney Concert Hall from the north sidewalk than from the southern sidewalk along First Street. Overall, the northern side of the Walt Disney Concert Hall seems to be more aesthetically appealing than other sides of the Disney Concert Hall given the architectural design and main entrance to the building near the northeast corner of the site. The tower proposed for the corner of First Street and Grand Avenue under the Revised Project would not create a significant view impact, as unobstructed westerly views towards the Walt Disney Concert Hall would continue to be available from adjoining sidewalks on Grand Avenue, First Street, and portions of Second Street to the south. Currently, public views in a westerly direction towards the Walt Disney Concert Hall from various vantage points along the adjacent roadways and sidewalks are obstructed because the site currently contains a parking garage and various walls. Thus, these views are already currently interrupted and are not considered expansive views. Though there is a potential for a slight view through the Revised Project from Olive Street to the Walt Disney Concert Hall, dense development throughout downtown Los Angeles already obstructs any potential panoramic views beyond the Walt Disney Concert Hall or views that would be considered a scenic resource.

Private residential views from areas along Olive Street in a westerly direction over the site do not exist. Also, the placement of the tower at the corner of First Street and Grand Avenue would create a view perspective that is typical of views within the Los Angeles high rise core in downtown, and similar views would continue to be available from the Grand Avenue corridor and other street and sidewalk areas in the city.

East-Facing Views

With regard to east-facing views across Parcel Q from the Grand Avenue street and sidewalk, and from the Walt Disney Concert Hall entrance plaza, interrupted views of older downtown buildings, including City Hall, are available. However, similar to the Certified EIR, development on Parcel Q with two new tower locations would not create a significant view impact due to the location of City Hall to the north of First Street and the existing view corridor that is widely open and created by First Street. Even with a tower placed near the corner of Grand Avenue and First Street, existing interrupted and non-expansive view corridors of downtown Los Angeles along First and Second Streets would continue to exist. Currently, private views in an easterly direction (from the west side of Grand Avenue) do not exist due to the Walt Disney Concert Hall and overall topography of this area of downtown Los Angeles. Thus,

construction of the Revised Project would not obstruct public views of a scenic resource and impacts to public views in an easterly direction would be less than significant.

South-Facing Views

South-facing publicly accessible views across Parcel Q from areas north of the project site would be similar to those discussed in the Certified EIR, albeit, the location of one of the proposed towers is now located further to the north, near the corner of First Street and Grand Avenue rather than Grand Avenue and Second Street. Nevertheless, the interrupted skyline views from sidewalks and streets along Grand Avenue and Olive Street looking in a southerly direction are typical of views within downtown Los Angeles. Any publicly accessible view from these locations north of the site would be temporary in nature and would usually occur while in a car or walking on the sidewalks. These temporary views of structures such as the Walt Disney Concert Hall northern façade and entrance, or future Broad Museum, would still be available through existing view corridors. Thus, with development of Parcel Q, views would continue to be of high-quality high-rise structures and impacts would be less than significant. Currently, private views in a southerly direction do not exist due to existing office buildings, City Hall, courthouses, and overall topography of this area of downtown Los Angeles.

Thus, the impact of development relative to south-, east-, and west-facing views of the Walt Disney Concert Hall, the future Broad Museum, the 578-foot tall California Plaza property, Wells Fargo towers, and public streets and sidewalks would be considered less than significant, similar to the Approved Project and Certified EIR.

North-Facing Views

As noted, north-facing private views under the Approved Project were considered significant and unavoidable. With that, the buildings to be constructed on Parcel Q under the Revised Project would similarly block views of the San Gabriel Mountains and the horizon for residents of the Museum Tower residential building, just south of the Colburn School that have northerly to northwesterly views. These north-facing views and associated view impacts would be the same as those mentioned under the Approved Project (regardless of tower location), as the views of the horizon and San Gabriel Mountains extend horizontally over the entirely of Parcel Q.

North facing private and public views of architecturally significant buildings such as the backside of the Walt Disney Concert Hall, City Hall, County Courthouse, and Broad Museum, would not be blocked due to the Revised Project tower locations. In particular, private views of these structures from the Museum Tower residential building would open up slightly when compared to the Certified EIR tower locations. Proposing a tower further north near Grand Avenue and First Street would soften any view impacts from these areas south of the project site. Similar to other view directions above, the Revised Project would alter public views in a northerly direction from Second Street, Grand Avenue, and Olive Street, by blocking views of certain surrounding buildings from specific points on these surrounding streets. Currently public views from vantage points along the adjacent roadways and sidewalks are obstructed due to the existing development on the project site, existing topography, and surrounding mid- to high-rise

structures. However, these available views towards buildings such as the Walt Disney Concert Hall are interrupted and non-expansive.

Additionally, since portions of Parcel Q could be developed with two high-rise towers, the development of Parcel Q, under the Revised Project, could also block some publicly available north-facing views of the horizon from the California Plaza, Wells Fargo Bank, and Bank of America Plaza towers. Nevertheless, similar to the Approved Project, although north-facing views across Parcel Q do not contain scenic vistas of the City's skyline, partial view blockage from these nearby office towers would occur.

Overall, although the Certified EIR concluded that a significant and unavoidable impact could occur, the Revised Project would not result in any new significant impacts or substantial increase in the severity of previously-identified impacts in the Certified EIR with respect to views. Additionally, although there is a potential for a slight view through the Revised Project from Olive Street to the Walt Disney Concert Hall, dense development throughout downtown Los Angeles already obstructs any potential panoramic views beyond the Walt Disney Concert Hall or views that would be considered a scenic resource.

Light and Glare

Certified EIR

The Certified EIR concluded, for the Approved Project, for Parcel Q, that although ambient lighting would increase, the increased ambient light would not alter the character of the highly urbanized area or prevent the performance of any off-site activity, such as the safe operation of a motor vehicle. The Approved Project would generate potential glare associated with reflected sunlight from building surfaces. However, with the implementation of mitigation measures, compliance measures, and project design features, potential light and glare impacts associated with special events lighting and reflected sunlight would be reduced to less than significant levels.

Revised Project

Construction-Lighting

Similar to the Approved Project, under the Revised Project although the construction site may be illuminated for safety and security purposes, nighttime construction limitations of the Los Angeles Municipal Code (LAMC) would preclude any significant light and glare impacts on residential or sensitive land uses due to the Revised Project construction activities. The mitigation measures set forth in the Certified EIR with respect to development activity within the five development parcels would apply to the development associated with the Revised Project on Parcel Q. As such, the Revised Project would not result in any new significant impacts or substantial increase in the severity of previously-identified impacts in the Certified EIR with respect to construction lighting.

Operation-Lighting

Under the Revised Project, impacts from light levels during operation under the Revised Project would be similar to the Approved Project. The same mitigation and regulatory measures set forth in the Certified EIR with respect to lighting impacts would apply to the Revised Project. These include design of new lighting sources to prevent light spillover onto adjacent private property (i.e., shielding of building lighting). The mitigation measures set forth in the Certified EIR with respect to development activity within the five development parcels would apply to the development associated with the Revised Project on Parcel Q. As such, the Revised Project would not result in any new significant impacts or substantial increase in the severity of previously-identified impacts in the Certified EIR with respect to lighting during operation of the Revised Project.

Glare

Similar to the Approved Project, under the Revised Project, any shiny trim or awnings visible from northbound Grand Avenue would have the potential to reflect sunlight. However, the tower buildings in their new locations could include an extensive amount of glass coverage on the façade of the buildings. It is noted, however, that Grand Avenue also experiences a great deal of existing afternoon shading and all reasonable and appropriate measures would be taken to prevent significant light and glare impacts relative the glass façade. No sun reflection toward southbound streets is anticipated since, in order to receive sun reflection, the sun must be behind the viewer and reflect on a surface that is in front of the viewer. The mitigation measures set forth in the Certified EIR with respect to development activity within the five development parcels would apply to the development associated with the Revised Project on Parcel Q. As such, the Revised Project would not result in any new significant impacts or substantial increase in the severity of previously-identified impacts in the Certified EIR with respect to glare.

Shade/Shadow

Certified EIR

The shade/shadow analysis in the Certified EIR identifies those areas that are currently shaded by existing buildings, the areas that would be shaded by the Project with Height Overlay Zones with County Building Option, and the new shadows that would occur in areas that are not currently shaded. Overall, the Certified EIR concluded that the Approved Project, for Parcel Q, would not shade any off-site sensitive uses in excess of the established significance thresholds and, therefore, would not cause any significant and unavoidable shade/shadow impacts.

Revised Project

The Revised Project proposes new locations for its towers. As discussed above, the proposed revisions include placing one tower near the corner of Grand Avenue and First Street (rather than Grand Avenue and Second Street) and another tower near the corner of Olive Street and Second Street (rather than Olive Street and First Street). Under the Revised Project, the two towers would be within the maximum height

envelope evaluated in the Certified EIR with respect to shade/shadow and thus would not exceed the impacts of the Approved Project with respect to shade/shadow.

Similar to the Approved Project, potential shading impacts on sun-sensitive uses were analyzed according to the shadow lengths created by the maximum buildings heights and approximate percentage of lot coverage, or worst case scenario allowed under the Revised Project. Based on the maximum building heights, the identified specific times for the winter and summer solstices as well as the spring and fall equinoxes were used and impacts found to be less than significant.

Similar to the Certified EIR, since most sun-sensitive uses surrounding the site are situated just south or to the west of the Approved Project, the potential for shade/shadow impacts are reduced, as the site is not completely surrounded by sensitive receptors. In particular, due to the locations of these identified uses and regardless of the overall height of the towers, no proposed overlay height zone would shade a sun-sensitive use for more than three hours during the winter solstice and spring equinox, and no more than four hours during the summer solstice and fall equinox. Since these uses are just south and west of the site, the new location of towers would not create an impact not previously discussed and analyzed in the Certified EIR. As such, the Revised Project would not result in any new significant impacts or substantial increase in the severity of previously-identified impacts in the Certified EIR with respect to shade/shadow.

GREENHOUSE GAS EMISSIONS

The Certified EIR did not address greenhouse gas emissions associated with the Approved Project. Global climate change was not routinely analyzed prior to AB32, effective in 2007, and the CEQA Guidelines did not address greenhouse gases or global climate change at the time the Final EIR for the Approved Project was certified.

However, although greenhouse gas emissions were not routinely analyzed in 2007, information regarding potential harmful effects of those emissions was known at the time. The United Nations Framework Convention on Climate Change was established in 1992. The regulation of greenhouse gas emissions to reduce climate change impacts was extensively debated and analyzed throughout the early 1990s. The studies and analyses of this issue resulted in the adoption of the Kyoto Protocol in 1997. In the early and mid 2000s, GHGs and climate change were extensively discussed and analyzed in California. In 2000, SB 1771 established the California Climate Action Registry for the recordation of greenhouse gas emissions to provide information about potential environmental impacts. Therefore, the impact of greenhouse gases on climate change was known at the time of the certification of the EIR, and their impacts do not constitute "new information" which would require the preparation of a supplemental EIR under Guidelines Section 15162.

Nonetheless, the Addendum to the Final EIR that was prepared for the Project in 2010 analyzed greenhouse gas emissions. To provide additional information to the public, the analysis below uses

relevant information identified in the 2010 Addendum and expands it accordingly as it relates to Parcel Q and the changes proposed.

Introduction

The Earth's natural warming process is known as the "greenhouse effect." This greenhouse effect compares the Earth and the atmosphere surrounding it to a greenhouse with glass panes. The glass allows solar radiation (sunlight) into the Earth's atmosphere, but prevents radiative heat from escaping, thus warming the Earth's atmosphere. Greenhouse gases (GHGs) keep the average surface temperature of the Earth close to a hospitable 60 degrees Fahrenheit. However, excessive concentrations of GHGs in the atmosphere can result in increased global mean temperatures, with associated adverse climatic and ecological consequences.

Scientists studying the particularly rapid rise in global temperatures have determined that human activity has resulted in increased emissions of GHGs, primarily from the burning of fossil fuels (during motorized transport, electricity generation, consumption of natural gas, industrial activity, manufacturing, etc.) and deforestation, as well as agricultural activity and the decomposition of solid waste.

Scientists refer to the global warming context of the past century as the "enhanced greenhouse effect" to distinguish it from the natural greenhouse effect. While the increase in temperature is known as "global warming," the resulting change in weather patterns is known as "global climate change." Global climate change is evidenced in changes to wind patterns, storms, precipitation, and air temperature.

GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3). Carbon dioxide is the most abundant GHG. Other GHGs are less abundant, but have higher global warming potential than CO_2. Thus, emissions of other GHGs are frequently expressed in the equivalent mass of CO_2, denoted as CO_2e. Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions.

A general description of the GHGs discussed is provided in Table IV-1, Description of Identified Greenhouse Gases.

Table IV-1
Description of Identified Greenhouse Gases

Greenhouse Gas	General Description
Carbon Dioxide (CO_2)	An odorless, colorless GHG, which has both natural and anthropocentric sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic activity. Anthropogenic (human caused) sources of carbon dioxide are from burning coal, oil, natural gas, and wood.

Table IV-1
Description of Identified Greenhouse Gases

Greenhouse Gas	General Description
Methane	A flammable gas and the main component of natural gas. When one molecule of methane is burned in the presence of oxygen, one molecule of carbon dioxide and two molecules of water are released. There are no ill health effects from methane. A natural source of methane is from the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain methane, which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
Nitrous Oxide (N_2O)	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. Nitrous oxide is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
Hydrofluorocarbons (HFCs)	HFCs are synthetic man-made chemicals that are used as a substitute for chlorofluorocarbons (CFCs) for automobile air conditioners and refrigerants. CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. As CFCs destroy stratospheric ozone, their production was stopped as required by the Montreal Protocol in 1987.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and do not break down though the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above the earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semiconductor manufacture.
Sulfur Hexafluoride (SF_6)	An inorganic, odorless, colorless, non-toxic, and nonflammable gas. SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.
Nitrogen Trifluoride (NF_3)	NF_3 is an inorganic, odorless, colorless, toxic, nonflammable gas. It has one of the highest GWP among GHGs (17,200) with an atmospheric lifetime of 740 years. NF_3 is emitted during manufacture of various electronics including televisions, photovoltaic solar panels, and microprocessors.

Sources: Association of Environmental Professionals, Alternative Approaches to Analyze Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final, June 29, 2007.

Global Warming Potential

Global Warming Potentials (GWPs) are one type of simplified index based upon radiative (heat-absorbing) properties that can be used to estimate the potential future impacts of emissions of different gases upon the climate system in a relative sense. GWP is based on a number of factors, including the radiative efficiency (heat-absorbing ability) of each gas relative to that of carbon dioxide, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years) relative to that of carbon dioxide. For example, methane has 21 times the global warming potential as does carbon dioxide.

A summary of the atmospheric lifetime and GWP of selected gases is presented at Table IV-2, Atmospheric Lifetimes and Global Warming Potentials. As indicated, GWP ranges from 1 to 23,900 times the GWP of carbon dioxide in the atmosphere.

Table IV-2
Atmospheric Lifetimes and Global Warming Potentials

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100 year time horizon)
Carbon Dioxide	50 – 200	1
Methane	12 (+/-3)	21
Nitrous Oxide	120	310
HFC-23	264	11,700
HFC-134a	14.6	1,300
HFC-152a	1.5	140
PFC: Tetrafluoromethane (CF_4)	50,000	6,500
PFC: Hexafluoroethane (C_2F_6)	10,000	9,200
Sulfur Hexafluoride (SF_6)	3,200	23,900

Source: IPCC, 2006.

Projected Impacts of Global Warming in California

According to the 2006 California Climate Action Team (CAT) Report, temperature increases arising from increased GHG emissions could potentially result in a variety of impacts to the people, economy, and environment of California associated with a projected increase in extreme conditions. Severity of the impacts depends upon actual future emissions of GHGs and associated warming.

California-Specific Adaptation Strategies

Because climate change already affects California and current emissions will continue to propel climate change in the coming decades, regardless of any mitigation measures that may be adopted, the necessity of adaptation to the impacts of climate change is recognized by the State of California. The 2009 California Climate Adaptation Strategy Discussion Draft begins a now ongoing process of adaptation, as directed by Executive Order S-13-08 (discussed in detail below). The goals of the approach are to analyze risks and vulnerabilities and identify strategies to reduce the risks. Once the strategies are identified and prioritized, government resources would be identified.

Climate change risks are evaluated using two distinct approaches: (1) projecting the amount of climate change that may occur using computer-based global climate models, and (2) assessing the natural or human system's ability to cope with and adapt to change by examining past experience with climate variability and extrapolating this to understand how the systems may respond to the additional impact of climate change. The major anticipated climate changes expected in the State of California include: increases in temperature; decreases in precipitation; particularly as snowfall; and increases in sea level, as discussed above.

Existing Setting

Existing GHG Emissions in Project Vicinity

GHG emissions are generated in the local vicinity of the Project site by stationary and area-wide sources, such as space and water heating, landscape maintenance by leaf blowers and lawn mowers, consumer products, and mobile sources, primarily automobile traffic. Overall, motor vehicles are the primary source of GHGs in the Project site vicinity. A key characteristic of the existing site is that it is used for vehicle parking, which promotes automobile traffic. No other existing sources of greenhouse gases exist at the Revised Project site.

Existing State-wide Greenhouse Gas Emissions

The California Energy Commission (CEC) published the *Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004* in December 2006. This report indicates that California emitted between 425 and 468 million metric tons of greenhouse gases in 1990. This seemingly large amount is a result of the large population residing in California. When considering fossil fuel emissions at the level of each individual person, California is second lowest in the nation in per capita CO_2 emissions, with only the District of Columbia being lower. Between 1990 and 2000, California's population grew by 4.1 million people and during the 1990 to 2003 period, California's gross state product grew by 83 percent (in dollars, not adjusted for inflation). However, California's greenhouse gas emissions were calculated to have grown by only 12 percent over the same period. The report concluded that California's ability to slow the rate of growth of GHG emissions was largely due to the success of its energy efficiency, renewable energy programs, and commitment to clean air and clean energy. The State's programs and commitments were calculated to have lowered its GHG emissions rate of growth by more than half of what it would have been otherwise.

State Emissions

In December 2006, the California Energy Commission prepared an inventory of GHG emissions for the State.[1] It includes a projected inventory of 542 million metric tons of CO_2e in 2010 and 610 million metric tons projected for 2020.

Regulatory Discussion

Assembly Bill 32 (California Global Warming Solutions Act)

California's major initiative for reducing greenhouse gas emissions is outlined in Assembly Bill 32 (AB-32), the "Global Warming Solutions Act," passed by the California State legislature on August 31, 2006. Assembly Bill 32 required CARB to:

- Establish a statewide greenhouse gas emissions cap for 2020, based on 1990 emissions, by January 1, 2008;
- Adopt mandatory reporting rules for significant sources of greenhouse gas emissions by January 1, 2008;
- Adopt an emissions reduction plan by January 1, 2009, indicating how emissions reductions will be achieved via regulations, market mechanisms, and other actions;
- Adopt regulations to achieve the maximum technologically feasible and cost-effective reductions of greenhouse gases by January 1, 2011; and
- Prepare a Scoping Plan outlining the State's strategy to achieve the 2020 greenhouse gas emissions limit.

The CARB has established that the level of annual greenhouse gas emissions in 1990 was 427 million metric tons of "CO_2 equivalence" (CO_2e).[2] The term "Carbon Dioxide Equivalence" (CO_2e) describes, for a given Greenhouse Gas, the amount of CO_2 that would have the same global warming potential, when measured over a specified timescale. The emissions target of 427 million metric tons of CO_2e/year requires the reduction of 80 million metric tons from the State's projected "business-as-usual" 2020

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1 *California Energy Commission, Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004; CEC-600-2006-013-SF (December 2006).*

2 *California Air Resources Board. California 1990 Greenhouse Gas Emissions Level and 2020 Limit. Available at: http://www.arb.ca.gov/cc/inventory/1990level/1990level.htm.*

emissions of 507 million metric tons[3] (i.e., the 1990 levels are approximately 28.4 percent below "business-as-usual"). "Business-as-usual" is a forecast of the California economy in 2020 without implementation of any of the greenhouse gas reduction measures identified in the Scoping Plan. The Scoping Plan was approved by CARB on December 11, 2008, and includes measures to address greenhouse gas emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures.[4] More specifically, the Scoping Plan includes aggressive energy efficiency goals and methods for increasing renewable energy use. As stated on page 27 of the 2008 Scoping Plan, CARB encourages local governments to adopt a reduction goal for municipal operations emissions and move toward establishing similar goals for community emissions that parallel the State's commitment to reduce greenhouse gas emissions by approximately 15 percent from current levels by 2020. Meeting the goals in the Scoping Plan will require expanded utility-based energy efficiency programs, more stringent building and appliance standards, green building practices, waste reduction, and innovative strategies that go beyond traditional approaches.

In August 2011, the Scoping Plan was revised and reapproved by the CARB and includes the Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED).[5] The 2011 revisions to the Scoping Plan include a new "business-as-usual" benchmark of 507 million metric tons of CO_2e/year in 2020 and revised emissions reduction requirements based on updated emissions projections in light of the economic downturn since 2008. The revised Scoping Plan indicates that California needs to reduce greenhouse gas emissions by approximately 16 percent below "business as usual" greenhouse gas emissions for year 2020 to attain the goal of 1990 emission levels, or 427 million metric tons of CO_2e, by 2020. The Scoping Plan includes a range of greenhouse gas reduction actions that may include direct regulations, alternative compliance mechanisms, monetary and nonmonetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system. It is important to note that the Scoping Plan, even after Board approval, remains a recommendation.

SB 97 & CEQA Guidelines

In August 2007, the Legislature adopted Senate Bill 97 (SB 97), requiring the Office of Planning and Research (OPR) to prepare and transmit new CEQA guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. Following receipt of these

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[3] *California Air Resources Board. Greenhouse Gas Inventory - 2020 Emissions Forecast. Available at: http://www.arb.ca.gov/cc/inventory/data/forecast.htm, last accessed February 2012.*

[4] *California Air Resources Board. December 2008. Climate Change Proposed Scoping Plan: a Framework for Change. Available at: http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf, last accessed October 9, 2012.*

[5] *California Air Resources Board. August 2011. Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document. Available at: http://www.arb.ca.gov/cc/scopingplan/document/final_supplement _to_sp _fed.pdf, last accessed October 9, 2012.*

guidelines, the Resources Agency was required to certify and adopt the guidelines prepared by OPR by January 1, 2010.

OPR submitted its proposed guidelines to the Secretary for Natural Resources on April 13, 2009. The Natural Resources Agency then undertook the formal rulemaking process to certify and adopt the amendments as part of the state regulations implementing CEQA. The CEQA Guidelines Amendments were adopted on December 30, 2009 and became effective on March 18, 2010.

The CEQA Guideline Amendments do not specify a threshold of significance for GHG emissions, nor do they prescribe assessment methodologies or specific mitigation measures. Instead, the amendments encourage lead agencies to consider many factors in performing a CEQA analysis, but rely on the lead agencies in making their own significance threshold determinations based upon substantial evidence. The CEQA Guidelines Amendments also encourage public agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses.

Title 24 Energy Efficiency Standards

California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

The most recent update to Title 24 was adopted by the CEC on April 23, 2008. Newly revised standards were recently approved and will be effective in January of 2014. The requirement for when the 2008 standards must be followed is dependent on when the application for the building permit is submitted. If the application for the building permit is submitted on or after January 1, 2010, the 2008 standards must be met. The CEC adopted the 2008 changes to the Building Energy Efficiency Standards to respond to the mandates of AB 32 and to pursue California energy policy that energy efficiency is the resource of first choice for meeting California's energy needs.

California Green Building Code

The California Green Buildings Standards Code (Cal Green Code) (California Code of Regulations [CCR], Title 24, part 11) was adopted by the California Building Standards Commission in 2010 and became effective in January 2011. The Code applies to all new constructed residential, nonresidential, commercial, mixed-use, and State-owned facilities, as well as schools and hospitals. The Cal Green Code is comprised of Mandatory Residential and Nonresidential Measures and more stringent Voluntary Measures (Tiers I and II).

Mandatory Measures are required to be implemented on all new construction projects and consist of a wide array of green measures concerning project site design, water use reduction, improvement of indoor air quality, and conservation of materials and resources. The Cal Green Building Code refers to Title 24,

Part 6 compliance with respect to energy efficiency; however, it encourages 15 percent energy use reduction over that required in Part 6. Voluntary Measures are optional, more stringent measures that may to be used by jurisdictions that strive to enhance their commitment towards green and sustainable design and achievement of Assembly Bill 32 goals. For instance, under TIERs I and II, all new construction projects are required to reduce energy consumption by 15 percent and 30 percent, respectively, below the baseline required under the California Energy Commission (CEC), as well as implement more stringent green measures than those required by mandatory code.

Revised Project Impacts

The following analysis has been prepared in accordance with the requirements set forth in Section 15164.4 and Appendix G of the CEQA Guidelines, which became effective on March 18, 2010.

Section 15064.4 of the revised CEQA Guidelines that became effective on March 18, 2010 states:

(b) A lead agency should consider the following factors, among others, when assessing the significance of greenhouse gas emissions on the environment:

(1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;

(2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

(3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

Appendix G of the State CEQA Guidelines provides sample checklist questions for use in an Initial Study to determine a project's potential for environmental impact. These checklist questions include the following:

- Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance?
- Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Accordingly, the Revised Project would have a significant impact with respect to GHG emissions and global climate change if it would substantially conflict with the provisions of Section 15064.4(b) of the State CEQA Guidelines or Appendix G to the CEQA Guidelines as set forth above. The State CEQA Guidelines leave the determination of significance to the reasonable discretion of the lead agency and encourage lead agencies to develop and publish thresholds of significance for use in determining the significance of environmental effects in CEQA documents. However, neither SCAQMD nor the County of Los Angeles has yet established specific quantitative significance thresholds for greenhouse gas emissions for residential or commercial projects.

Revised Project GHG Emissions

Construction emissions represent an episodic, temporary source of GHG emissions. Such emissions are generally associated with the operation of construction equipment and the disposal of construction waste. To be consistent with the guidance from the SCAQMD for calculating criteria pollutants from construction activities, only GHG emissions from on-site construction activities and off-site hauling and construction worker commuting are considered as Project-generated. As explained by California Air Pollution Controls Officers Association (CAPCOA) in its 2008 white paper, the information needed to characterize GHG emissions from manufacture, transport, and end-of-life of construction materials would be speculative at the CEQA analysis level. CEQA does not require an evaluation of speculative impacts (*CEQA Guidelines* §15145). Therefore, the construction analysis does not consider such GHG emissions, but does consider on-site construction activities and off-site hauling and construction worker trips.

During operation of the Project, greenhouse gases would be emitted from new direct operational sources, such as natural gas usage; and indirect operational sources, such as production of electricity used at the Revised Project, transport of water, and decomposition of Project-related wastes. Greenhouse gases would also be emitted by residents, visitors, and employees travelling to and from the Project site. It should be noted that all operational GHG emissions are reported on an annual basis.

Emissions of GHGs were calculated using the California Emissions Estimator Model (CalEEMod Version 2013.2) for the construction year of 2015 for the Proposed Project. The construction assumptions for this analysis were generally based on Certified EIR for Parcel Q. As shown in Table IV-3, Predicted Greenhouse Gas Emissions Associated with Revised Project on Parcel Q, the total GHG emissions (CO_2e) from Project construction activities would be 6,207.34 metric tons, and the annual GHG emissions (CO_2e) from Project operations would be 20,259.13 metric tons.

Table IV-3
Predicted Greenhouse Gas Emissions Associated with Revised Project on Parcel Q

Emissions Source	CO_2e Emissions in Metric Tons per Year
Construction	6,207.34
Revised Project Operation	
Natural Gas Consumption	1,878.62
Electricity Consumption	6,800.72
Hearth	159.61
Landscaping Equipment	8.62
Water Consumption	795.27
Solid Waste Generation	381.46
Motor Vehicles	10,234.83
Total Emissions	**20,259.13**
Source: Pomeroy Environmental Services (PES), August 2013.	

Assessment of Potential Significance of Revised Project GHG Emissions

For the qualitative GHG emissions analysis for the Revised Project, the 2006 CAT Report and the ARB's AB 32 Scoping Plan have recommended a list of strategies and measures that the State could pursue to reduce climate change greenhouse gas emissions. Thus, in the absence of regulatory guidance, this document also addresses the potential impacts associated with GHG emissions resulting from implementation of the Revised Project by evaluating qualitatively whether the Revised Project development on Parcel Q would be consistent with the emission reduction strategies identified by the CAT Report and the ARB AB 32 Scoping Plan.

Neither the State, the South Coast Air Quality Management District (SCAQMD), nor the County of Los. Angeles has officially adopted a quantitative significance threshold for GHG emissions that can be used to determine whether a project "may have a significant impact on the environment" in accordance with Guidelines Appendix G. The emission by any individual project of GHGs into the atmosphere typically is too small to cause an adverse environmental effect by itself. Rather, the potential impact is attributable to the increased accumulation of GHGs in the atmosphere that results in global climate change. The resultant consequences of that climate change can cause adverse environmental effects.

Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, it is not possible to establish direct relationships and predict the specific impact, to global climate change from one project's or even a set of cumulative projects' relatively small incremental increase in emissions. However, AB 32 represents the statewide plan for reducing California's GHG emissions to 1990 levels by 2020. In addition, the AB 32 Scoping Plan contains the main strategies California will use to reduce the GHGs that cause climate change. The scoping plan has a range of GHG reduction actions which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32

cost of implementation fee regulation to fund the program. As such, the AB 32 Scoping Plan would represent a statewide plan for the reduction or mitigation of greenhouse gas emissions that was adopted by the relevant public agency through a public review process in accordance with Guidelines Section 15064.4(b)(3), and would constitute a plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases in accordance with Guidelines Appendix G.

Accordingly, taking all of the factors set forth in Guidelines Section 15064.4(b) into account, the Revised Project will be deemed to cause a significant impact with respect to GHG emission if the Revised Project would be inconsistent with the ARB AB 32 Scoping Plan and other applicable guidance documents issued in furtherance of AB 32 to date, including the 2006 CAT Report, and the Attorney General's publication, *CEQA: Addressing Global Warming Impacts at the Local Agency Level* is assessed. By evaluating consistency with all of these documents, it can be determined whether the Revised Project would achieve the emissions reductions that the Legislature has determined California must achieve.

Revised Project Compliance with ARB's AB 32 Scoping Plan Recommended Measures

The consistency of the Revised Project development on Parcel Q with the strategies from the ARB's AB 32 Scoping Plan measures is evaluated in Table IV-4, Revised Project Consistency with ARB Scoping Plan Recommended Greenhouse Gas Emission Reduction Measures. As shown, the Revised Project would be consistent with the recommended measures of the ARB AB 32 Scoping Plan to reduce greenhouse gas emissions in California. Therefore, GHG emissions associated with the development on Parcel Q that would be permitted under the Revised Project would not contribute to cumulative adverse GHG emissions impact and the impact of the Revised Project with respect to GHG emissions and climate change would be less than significant.

Table IV-4
Revised Project Consistency with ARB AB 32 Scoping Plan Recommended Greenhouse Gas Emission Reduction Measures

Measure	Project Consistency
California Air Resources Board	
California Cap-and-Trade Program Linked to Western Climate Initiative Partner Jurisdictions Implement a broad-based California cap-and-trade program to provide a firm limit on emissions. Link the California cap–and-trade program with other Western Climate Initiative Partner programs to create a regional market system to achieve greater environmental and economic benefits for California. Ensure California's program meets all applicable AB 32 requirements for market-based mechanisms.	**Not applicable.** While this measure is not specifically applicable to the Revised Project, the Revised Project would not preclude the implementation of this measure by the ARB.
California Light-Duty Vehicle Greenhouse Gas Standards Implement adopted Pavley standards and planned	**Not Applicable.** The Revised Project does not influence or impact

Table IV-4
Revised Project Consistency with ARB AB 32 Scoping Plan Recommended Greenhouse Gas Emission Reduction Measures

Measure	Project Consistency
second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	regulatory decision-making on light-duty vehicle standards.
Energy Efficiency Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities).	**Consistent.** The Revised Project would be required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development. The overall intent of the Revised Project is to exceed Title 24 requirements. In addition, under State law, appliances that are purchased for the Revised Project – both pre- and post-development – would be consistent with energy efficiency standards that are in effect at the time of manufacture.
Renewables Portfolio Standard Achieve 33 percent renewable energy mix statewide.	**Not applicable.** While this measure is not applicable, the Revised Project would not preclude the implementation of this measure by municipal utility providers.
Low Carbon Fuel Standard Develop and adopt the Low Carbon Fuel Standard.	**Not Applicable.** The Revised Project has no influence or impact on regulatory decision-making regarding low carbon fuel standards.
Regional Transportation-Related Greenhouse Gas Targets Develop regional greenhouse gas emissions reduction targets for passenger vehicles.	**Not Applicable.** The Revised Project has no influence or impact on regulatory decision-making regarding GHG emissions targets.
Vehicle Efficiency Measures Implement light-duty vehicle efficiency measures.	**Not Applicable.** The Revised Project has no influence or impact on regulatory decision-making regarding vehicle efficiency standards.
Goods Movement Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	**Not applicable.** The Revised Project has no influence or impact on regulatory decision-making regarding the improvement in goods movement activities.
Million Solar Roofs Program Install 3,000 MW of solar-electric capacity under California's existing solar programs.	**Consistent** Although solar roofs are not specifically proposed as part of the Revised Project, the design of the new towers would not preclude the installation and use of solar equipment in the future if they become cost effective from a purchase and maintenance

Table IV-4
Revised Project Consistency with ARB AB 32 Scoping Plan Recommended Greenhouse Gas Emission Reduction Measures

Measure	Project Consistency
	standpoint of the property owners.
Medium/Heavy-Duty Vehicles Adopt medium and heavy-duty vehicle efficiency measures.	**Not Applicable.** The Revised Project has no influence or impact on regulatory decision-making regarding medium/heavy-duty vehicle efficiency standards.
Industrial Emissions Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions and provide other pollution reduction co-benefits. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive methane emissions and reduce flaring at refineries.	**Not applicable.** The Revised Project is not an industrial facility and would not involve the operation of industrial processes.
High Speed Rail Support implementation of a high speed rail system.	**Not applicable.** While this measure is not applicable, the Revised Project would not preclude the implementation of this measure by the State.
Green Building Strategy Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Consistent.** As the Revised Project would intend to exceed Title 24 requirements, water saving features and energy efficient features would be incorporated into the Project's design.
High Global Warming Potential Gases Adopt measures to reduce high global warming potential gases.	**Consistent.** As the Revised Project would intend to exceed Title 24 requirements, water saving features and energy efficient features would be incorporated into the project's design – and specifically the towers. The Revised Project would also not preclude the implementation of this measure by the ARB.
Recycling and Waste Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	**Consistent.** The Revised Project would be subject to the requirements of AB 939. In addition, the Project Site is located within the City of Los Angeles, which surpassed the State-mandated 50 percent diversion rate for the year 2000 and achieved a 58.8 percent diversion rate. In 2001 and 2002, the City achieved a diversion rate of 63 and 62 percent, respectively. Furthermore, in 1999, the Mayor directed City departments to develop strategies to achieve the citywide recycling goal of 70 percent by 2015. The

Table IV-4
Revised Project Consistency with ARB AB 32 Scoping Plan Recommended Greenhouse Gas Emission Reduction Measures

Measure	Project Consistency
	Revised Project would also be subject to all applicable State and City requirements for solid waste reduction as they change in the future. Finally, the Revised Project would be subject to the mitigation measures included in the Certified EIR that requires the Revised Project to include recycling of construction materials and recycling facilities in the Revised Project.
Sustainable Forests Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	**Not applicable.** The Revised Project is not located within or near a forest.
Water Continue efficiency programs and use cleaner energy sources to move and treat water.	**Consistent.** As the Revised Project would intend to exceed Title 24 requirements, water saving features and energy efficient features would be incorporated into the Revised Project's design.
Agriculture In the near-term, encourage investment in manure digesters and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	**Not applicable.** The Revised Project would not include any elements of agriculture.
Sources: Air Resources Board, Climate Change Proposed Scoping Plan, October 2008 and CAJA Environmental Services, LLC, 2014.	

Compliance with 2006 CAT Report Strategies and the Attorney General's Guidance on Addressing Global Warming Impacts at the Project Level

The consistency of the Revised Project with the strategies from the 2006 CAT Report is evaluated in Table IV-5, Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies. As shown, the Revised Project would be consistent with all feasible and applicable strategies of the 2006 CAT Report.

Table IV-5
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
California Air Resources Board	
Vehicle Climate Change Standards AB 1493 (Pavley) required the state to develop and adopt regulations that achieve the maximum feasible and cost-effective reduction of climate change emissions emitted by passenger vehicles and light duty trucks. Regulations were adopted by the ARB I September 2004.	**Consistent.** The vehicles that travel to and from the Project Site on public roadways would be in compliance with ARB vehicle standards that are in effect at the time of vehicle purchase.
Diesel Anti-Idling In July 2004, the ARB adopted a measure to limit diesel-fueled commercial motor vehicle idling.	**Consistent.** The Revised Project, which involves a development consisting of residential, commercial and hotel uses, would not involve substantial diesel truck idling operations. The hotel and restaurant uses would include a loading dock; however, trucks are not expected to idle at this facility. If they do, they are limited to 5 minutes in accordance with SCAQMD Rules.
Hydrofluorocarbon Reduction 1) Ban retail sale of HFC in small cans. 2) Require that only low GWP refrigerants be used in new vehicular systems. 3) Adopt specifications for new commercial refrigeration. 4) Add refrigerant leak-tightness to the pass criteria for vehicular inspection and maintenance programs. 5) Enforce federal ban on releasing HFCs.	**Consistent.** This strategy applies to consumer products that may be used by the new residents associated with the Revised Project. All applicable products would be required to comply with the regulations that are in effect at the time of manufacture.
Transportation Refrigeration Units, Off-Road Electrification, Port Electrification (ship to shore) Require all new transportation refrigeration units (TRU) to be equipped with electric standby. Require cold storage facilities to install electric infrastructure to support electric standby TRUs.	**Not applicable.** The Revised Project would not involve the use of transportation refrigeration units.
Manure Management Improved management practices, manure handling practices, and lagoon/liquid waste control options.	**Not applicable.** The Revised Project would not involve any manure handling.

Table IV-5
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Semi-Conductor Industry Targets Emission reduction rules for semiconductor operations.	**Not applicable.** The Revised Project would not involve any semiconductor operations.
Alternative Fuels: Biodiesel Blends ARB would develop regulations to require the use of 1 to 4 percent biodiesel displacement of California diesel fuel.	**Not Applicable.** The Revised Project has no influence or impact on ARB decision-making regarding fuel blend regulations.
Alternative Fuels: Ethanol Increased use of E-85 fuel.	**Not Applicable.** The Revised Project does not impact the availability of fuel blends.
Heavy-Duty Vehicle Emission Reduction Measures Increased efficiency in the design of heavy duty vehicles and an education program for the heavy duty vehicle sector.	**Consistent.** The heavy-duty vehicles (e.g., refuse and delivery trucks) that travel to and from the Project Site on public roadways would be subject to all applicable ARB efficiency standards that are in effect at the time of vehicle manufacture.
Reduced Venting and Leaks on Oil and Gas Systems Improved management practices in the production, processing, transport, and distribution of oil and natural gas.	**Not applicable.** The Revised Project does not involve any production, processing, transport, or distribution of oil and natural gas.
Hydrogen Highway The California Hydrogen Highway Network (CA H2 Net) is a State initiative to promote the use of hydrogen as a means of diversifying the sources of transportation energy.	**Not applicable.** The Revised Project would not be responsible for promoting the use of hydrogen for transportation energy. However, residents and patrons of the Revised Project could use this fuel once it becomes commercially available.
Achieve 50% Statewide Recycling Goal Achieving the State's 50 percent waste diversion mandate as established by the Integrated Waste Management Act of 1989, (AB 939, Sher, Chapter 1095, Statutes of 1989), will reduce climate change emissions associated with energy intensive material extraction and production as well as methane emission from landfills. A diversion rate of 48% has been achieved on a statewide basis. Therefore, a 2% additional reduction is needed.	**Consistent.** The Revised Project would be subject to the requirements set forth in AB 939, which requires each city or county to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. The Revised Project would be subject to the mitigation measures included in the Certified EIR that requires the Revised Project to include recycling of construction materials and recycling facilities in the Project.
Landfill Methane Capture Install direct gas use or electricity projects at landfills to capture and use emitted methane.	**Not applicable.** The Revised Project does not involve landfill operations.
Zero Waste – High Recycling	**Consistent.**

Table IV-5
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Efforts to exceed the 50 percent goal would allow for additional reductions in climate change emissions.	The Revised Project would be subject to the requirements of AB 939. In addition, the Project Site is located within the City of Los Angeles, which surpassed the State-mandated 50 percent diversion rate for the year 2000 and achieved a 58.8 percent diversion rate. In 2001 and 2002, the City achieved a diversion rate of 63 and 62 percent, respectively. Furthermore, in 1999, the Mayor directed City departments to develop strategies to achieve the citywide recycling goal of 70 percent by 2015. The Revised Project would also be subject to all applicable State and City requirements for solid waste reduction as they change in the future. Finally, the Revised Project would be subject to the mitigation measures included in the Certified EIR that requires the Revised Project to include recycling of construction materials and recycling facilities in the Project.
Department of Forestry	
Forest Management Increasing the growth of individual forest trees, the overall age of trees prior to harvest, or dedicating land to older aged trees.	**Not applicable.** The Revised Project is not located within or near a forest.
Forest Conservation Provide incentives to maintain an undeveloped forest landscape.	**Not applicable.** The Revised Project is not located within or near a forest.
Fuels Management/Biomass Reduce the risk of wildland fire through fuel reduction and biomass development.	**Not applicable.** The Revised Project is not located within or near a forest or an area of open space in which fuel accumulation is an issue.
Urban Forestry A new statewide goal of planting 5 million trees in urban areas by 2020 would be achieved through the expansion of local urban forestry programs.	**Not Applicable.** The Revised Project has no influence or impact on State decision-making regarding urban forestry programs.
Afforestation/Reforestation Reforestation projects focus on restoring native tree cover on lands that were previously forested and are now covered with other vegetative types.	**Not applicable.** The Revised Project is not located within or near a forest.

Table IV-5
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Department of Water Resources	
Water Use Efficiency Approximately 19 percent of all electricity, 30 percent of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute and use water and wastewater. Increasing the efficiency of water transport and reducing water use would reduce greenhouse gas emissions.	**Consistent.** The Revised Project applicant intends to exceed Title 24 requirements, thus, the provision of water saving features and energy efficient features would be included in the Revised Project. In addition, mitigation measures contained in the Certified EIR would require the Revised Project to include water conservation features and operational water use restrictions in accordance with laws and regulations in effect at the time of development.
Energy Commission (CEC)	
Building Energy Efficiency Standards in Place and in Progress Public Resources Code 25402 authorizes the CEC to adopt and periodically update its building energy efficiency standards (that apply to newly constructed buildings and additions to and alterations to existing buildings).	**Consistent.** The Revised Project would be required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development. As the Revised Project would intend to exceed Title 24 requirements, the Revised Project would exceed Title 24 standards.
Appliance Energy Efficiency Standards in Place and in Progress Public Resources Code 25402 authorizes the Energy Commission to adopt and periodically update its appliance energy efficiency standards (that apply to devices and equipment using energy that are sold or offered for sale in California).	**Not Applicable.** The Revised Project does not influence or impact regulatory decision-making on energy efficiency standards.
Fuel-Efficient Replacement Tires & Inflation Programs State legislation established a statewide program to encourage the production and use of more efficient tires.	**Not Applicable.** The Revised Project has no influence or impact on regulatory decision-making on tire production or efficiency standards.
Cement Manufacturing Cost-effective reductions to reduce energy consumption and to lower carbon dioxide emissions in the cement industry.	**Not applicable.** The Revised Project does not involve cement manufacturing.

Table IV-5
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Municipal Utility Energy Efficiency Programs/Demand Response Includes energy efficiency programs, renewable portfolio standard, combined heat and power, and transitioning away from carbon-intensive generation.	**Not applicable.** While this strategy is not applicable, the Revised Project would not preclude the implementation of this strategy by municipal utility providers.
Municipal Utility Renewable Portfolio Standard California's Renewable Portfolio Standard (RPS), established in 2002, requires that all load serving entities achieve a goal of 20 percent of retail electricity sales from renewable energy sources by 2017, within certain cost constraints.	**Not applicable.** While this strategy is not applicable, the Revised Project would not preclude the implementation of this strategy by municipal utility providers.
Municipal Utility Combined Heat and Power Cost effective reduction from fossil fuel consumption in the commercial and industrial sector through the application of on-site power production to meet both heat and electricity loads.	**Not applicable.** While this strategy is not applicable, the Revised Project would not preclude the implementation of this strategy by municipal utility providers.
Municipal Utility Electricity Sector Carbon Policy State agencies to address ways to transition investor-owned utilities away from carbon-intensive electricity sources.	**Not applicable.** While this strategy is not applicable, the Revised Project would not preclude the implementation of this strategy by municipal utility providers.
Alternative Fuels: Non-Petroleum Fuels Increasing the use of non-petroleum fuels in California's transportation sector, as recommended as recommended in the CEC's 2003 and 2005 Integrated Energy Policy Reports.	**Not Applicable.** The Revised Project does not influence or impact regulatory decision-making regarding the composition or availability of neither non-petroleum fuels, nor consumer choice regarding use of non-petroleum fuels in the transportation sector.
Business, Transportation and Housing	
Measures to Improve Transportation Energy Efficiency Builds on current efforts to provide a framework for expanded and new initiatives including incentives, tools and information that advance cleaner transportation and reduce climate change emissions.	**Not applicable.** While this strategy is not applicable, the Revised Project would not preclude the implementation of this strategy by State or local agencies.

Table IV-5
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Smart Land Use and Intelligent Transportation Systems (ITS) Smart land use strategies encourage jobs/housing proximity, promote transit-oriented development, and encourage high-density residential/commercial development along transit corridors. ITS is the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and movement of people, goods and services. Governor Schwarzenegger is finalizing a comprehensive 10-year strategic growth plan with the intent of developing ways to promote, through state investments, incentives and technical assistance, land use, and technology strategies that provide for a prosperous economy, social equity and a quality environment. Smart land use, demand management, ITS, and value pricing are critical elements in this plan for improving mobility and transportation efficiency. Specific strategies include: promoting jobs/housing proximity and transit-oriented development; encouraging high density residential/commercial development along transit/rail corridor; valuing and congestion pricing; implementing intelligent transportation systems, traveler information/traffic control, incident management; accelerating the development of broadband infrastructure; and comprehensive, integrated, multimodal/intermodal transportation planning.	**Consistent.** The Project Site is located within proximity to several public transportation services, including transit services provided by the Metropolitan Transportation Authority (MTA), the City of Los Angeles Department of Transportation (LADOT) Dash service, and the Metro Rail system. MTA provides both local and commuter bus lines through the downtown area. The Metro Red Line Civic Center station is approximately one-half mile from parcel Q. Several public and private shuttle services also operate in this area, providing access to downtown locations and rail transit stations. In addition, the Revised Project is situated within easy walking distance to existing retail, restaurant, and other commercial businesses located along the Grand Avenue corridor. Furthermore, the commercial component of the Revised Project would also serve the surrounding residential uses in the neighborhood, which in turn would reduce vehicular travel by the surrounding residences.
Department of Food and Agriculture	
Conservation Tillage/Cover Crops Conservation tillage and cover crops practices are used to improve soil tilt and water use efficiency, and to reduce tillage requirements, labor, fuel, and fertilizer requirements.	**Not applicable.** The Revised Project would not include any elements of agriculture.
Enteric Fermentation Cattle emit methane from digestion processes. Changes in diet could result in a reduction in emissions.	**Not applicable.** The Revised Project would not include any elements of agriculture.

Table IV-5
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
State and Consumer Services Agency	
Green Buildings Initiative Green Building Executive Order, S-20-04 (CA 2004), sets a goal of reducing energy use in public and private buildings by 20 percent by the year 2015, as compared with 2003 levels. The Executive Order and related action plan spell out specific actions state agencies are to take with state-owned and –leased buildings. The order and plan also discuss various strategies and incentives to encourage private building owners and operators to achieve the 20 percent target.	**Consistent.** As discussed previously, the Revised Project would be required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development. In addition, as the Revised Project intends to exceed Title 24 requirements.
Public Utilities Commission (PUC)	
Accelerated Renewable Portfolio Standard The Governor has set a goal of achieving 33 percent renewable in the State's resource mix by 2020. The joint PUC/Energy Commission September 2005 Energy Action Plan II (EAP II) adopts the 33 percent goal.	**Not applicable.** While this strategy is not applicable, the Revised Project would not preclude the implementation of this strategy by municipal utility providers.
California Solar Initiative The solar initiative includes installation of 1 million solar roofs or an equivalent 3,000 MW by 2017 on homes and businesses, increased use of solar thermal systems to offset the increasing demand for natural gas, use of advanced metering in solar applications, and creation of a funding source that can provide rebates over 10 years through a declining incentive schedule.	**Consistent** Although solar roofs are not proposed as part of the Revised Project, the design of the new buildings would not preclude the installation and use of solar equipment in the future if they become cost effective from a purchase and maintenance standpoint of the property owners.
Investor-Owned Utility Programs These strategies include energy efficiency programs, combined heat and power initiative, and electricity sector carbon policy for investor owned utilities.	**Not applicable.** While this strategy is not applicable, the Revised Project would not preclude the implementation of this strategy by investor owned utility providers.
Sources: Climate Action Team, Climate Action Team Report to Legislature, 2006 and CAJA Environmental Services, LLC, 2014.	

The Office of the Attorney General (AG's Office) released an updated memo in January 2010[6] that provides a list of various measures that may reduce the GHGs associated with a project. As discussed

[6] *California Attorney General. The California Environmental Quality Act Addressing Global Warming Impacts at the Project Level, January 2010.*

above, the Revised Project incorporates a number of the listed measures that would reduce GHG emissions from the Revised Project, including:

Energy Efficiency

- Install energy efficient lighting

Water Conservation and Efficiency

- Create water-efficient landscapes
- Install water-efficient fixtures and appliances

Solid Waste Measures

- Reuse and recycle construction waste
- Integrate reuse and recycling into project

Land Use Measures

- Incorporate public transit into the project's design
- Create open space and parks.
- Include pedestrian and bicycle facilities within the Revised Project.

Transportation and Motor Vehicles

- Require amenities for non-motorized transportation, such as secure and convenient bicycle parking.
- Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles.

These measures are largely duplicative of the components of the ARB AB 32 Scoping Plan and 2006 CAT Report and consistency with these measures is documented in Tables IV-4 and IV-5.

Because the Revised Project would be consistent with the provisions of the AB 32 Scoping Plan, 2006 CAT Report and AG's Office Guidance, impacts of the Revised Project with respect to GHGs and climate change would not conflict with the adopted state strategies for achieving reductions in GHG emissions to meet the requirements of AB 32 and would therefore be less than significant. No mitigation measures are required.

Traffic – Change in Timing of Implementation of Mitigation

Certified EIR

The Certified EIR lists several mitigation measures to help reduce potential traffic impacts. Of the measures identified, several require that the developer fund and implement various programs, one of

which includes the restriping of a westbound approach near the Third Street and Hill Street intersection. Another requires that the County fund and implement a Transportation Demand Management program for the proposed uses on Parcel W-2.

Revised Project

As identified in the Initial Study (attached hereto as Appendix A), a supplemental traffic report was prepared (Appendix I to the Initial Study), which has been approved by the Department of Transportation of the City (LADOT).[7] That report, which concludes the following: 1) that the trip generation from the Revised Project does not exceed the trip totals for the project analyzed in the 2006 EIR; 2) that the circumstances affecting the Project's traffic impacts, namely, the existing traffic in the relevant geographic area and future traffic associated with related projects, have not substantially changed; 3) that the Revised Project's access and circulation is essentially the same as the Approved Project site plan, and 4) that the Revised Project would not cause any new significant traffic impacts or a substantial increase in a previously identified impact, but would rather eliminate one significant impact identified in the Certified EIR. Thus, potential traffic impacts under the Revised Project would be similar or less than those under the Approved Project and no changes to mitigation measures are necessary to reduce any new significant impacts attributable to the Revised Project.

A preliminary review of necessary traffic mitigation measures to Parcel Q development was also prepared to determine the appropriate timing for implementation of previously identified traffic mitigation (Certified EIR Mitigation Measures B-1 through B-7). As outlined in the memorandum attached as Appendix B to this Addendum (the "2014 Traffic Mitigation Report"), the analysis estimated the number of vehicle trips that would be generated at the completion of the entire Phase 1 of Parcel Q, and then added in the two projects (Certified EIR) under construction on Parcel L/M-2. An impact analysis then conducted that assigned the trips generated by the two projects on Parcel L/M-2 and the trips generated by Parcel Q to the roadway traffic.

In summary, the Certified EIR determined that the Approved Project would cause 7 significant traffic impacts in the AM peak hour and 17 significant impacts in the PM peak hour. For the Revised Project, the number of significant impacts after Parcel Q is constructed would be within the envelope of total trips analyzed in the 2006 EIR. Since the Revised Project will not cause any new significant traffic impacts or a substantial increase in the severity of significant traffic impacts previously identified in the Certified EIR, there is no need for additional mitigation measures. The 2014 Traffic Mitigation Report also reached the following conclusions concerning the timing of the implementation of certain mitigation measures:

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[7] *The Department of Transportation for the City of Los Angeles (LADOT) issued letters approving the traffic study for the Certified EIR and the supplemental traffic study for the 2010 Addendum.*

- Mitigation Measure B-1 (Prepare Construction Traffic Control/Management Plan): Does apply to Parcel Q.

- Mitigation Measure B-2 (Distribute Construction Traffic Control/Management Plan): Does apply to Parcel Q.

- Mitigation Measure B-3 (Provide Off-Street Parking for Construction Workers): Does apply to Parcel Q.

- Mitigation Measure B-4 (Prepare Transportation Demand Management Plan for County Office Building): Does not apply to Parcel Q. This measure applies only to the County Office Building, which is located on Parcel Q, not Parcel Q.

- Mitigation Measure B-5 (Participation in Areawide ATSC Program): Applies and will remain a mitigation requirement for the Approved and Revised Project. Please see 2014 Traffic Mitigation Report for more information.

- Mitigation Measure B-6 (Measures to Reduce Project's Traffic and Circulation Impacts): Specifics to be determined in conjunction with LADOT. Please see menu of possible items the 2014 Traffic Mitigation Report.

- Mitigation Measure B-7 (Improvement at Intersection of Third Street and Hill Street): Does not apply. Parcel Q would not cause a significant impact at the Hill & 3rd intersection (see Table 4 of 2014 Traffic Mitigation Report)) as previously discussed, so implementation of this measure is not necessary for completion of the Revised Parcel Q Project.

Overall, the proposed change in timing of the implementation of previously identified mitigation measures would not create new or significantly altered environmental impacts that were previously disclosed in the Certified EIR.

SECOND ADDENDUM TO THE CERTIFIED EIR

THE GRAND AVENUE PROJECT

APPENDIX A

CALIFORNIA ENVIRONMENTAL QUALITY ACT

POST EIR - INITIAL STUDY AND CHECKLIST

CEQA Guidelines Section 15063, 15162, & 15164

PROJECT DESCRIPTION

Approved Project:

With respect to Parcels Q, the Certified EIR for the Approved Project evaluated development consisting of up to 400 residential units, approximately 97,750 square feet of retail floor area, 100 apartment units, 275 hotel rooms, a roughly 53,000 square foot supermarket, approximately 42,000 square feet of restaurant uses, a 250 seat event facility, and a 50,000 square foot athletics club. The Conceptual Plan for the Approved Project called for construction of a mid-rise tower containing residential uses and a high-rise tower containing hotel and residential uses. The height overlay in Parcel Q would allow a building height of 1,135 feet above mean sea level on 10 percent of the site; a building height of 835 feet above mean sea level on 20 percent of the site; a building height of 535 feet above mean sea level on 60 percent of the site; and a building height of 460 feet above mean sea level on 80 percent of the site.

The overlay configuration would confine the higher tower, under the Conceptual Plan, to 10 percent of the site, resulting in a single tall structure, rising to a height of up to 750 feet above Grand Avenue near the corner of Grande Avenue and Second Street. The second tower would rise to a height up to 450 feet above Grand Avenue near the corner of Olive Street and First Street. These two towers would not exceed 20 percent of the total site. Buildings that would not exceed a height of 150 feet and 75 feet, respectively, above Grand Avenue would be allowed on the remainder of the site (80 percent). Of the remaining 80 percent, buildings rising to a height of up to 150 feet above Grand Avenue could be developed on approximately half of the remaining area and buildings rising to a height of up to 75 feet above Grand Avenue would be allowed on the balance of Parcel Q.

Development of the Approved Project was also anticipated to occur in three construction phases. The initial development phase was to include the simultaneous completion of Civic Park; Grand Avenue streetscape improvements between Second and Temple Streets; and the development of Parcel Q. The second phase was to include the development of Parcels L and M-2 and Grand Avenue streetscape improvements. The third phase was to include the complete development of Parcels W-1/W-2 and Grand Avenue streetscape improvements. The Approved Project studied two possible construction scenarios, an anticipated and accelerated schedule. Specifically, in the event that the overall construction schedule is accelerated, the second phase would overlap part of the first phase, but the duration of each phase would remain at 36-months. In order to account for possible changes in schedule, the Certified EIR analyzed both construction schedules for a conservative analysis.

In 2010, an Addendum to the Final EIR was prepared for the Approved Project. That Addendum revised the Conceptual Plan for Parcels L and M-2 to reflect a different mix of land uses and a different site configuration than was provided for in the Conceptual Plan for the Approved Project. The Addendum included a museum facility, along with residential and retail uses and associated parking facilities, on Parcels L and M-2. Inclusion of the museum facility was proposed to be offset by reductions in residential units and retail square footage compared to the Approved Project.

Revised Project: The Revised Project would include the same uses but with a smaller amount of retail square footage and with a narrower subset of specific retail uses. Specifically, the Revised Project would revise the Conceptual Plan for Parcel Q in the following ways:

Program: The Revised Project would include similar uses but with a smaller amount of retail square footage and with a narrower subset of specific retail uses as detailed in Table II-1, Parcel Q Land Use Program Comparison, below. Specifically, the Revised Project would have approximately 220,000 square feet of retail uses and 450 residential units compared with the 284,000 square feet of retail uses and 500 residential units analyzed in the Certified EIR. Additionally, the revised program also proposed 300 hotel rooms as compared to the 275 rooms proposed under the Certified EIR. The current program is anticipated to include market rate and affordable rental apartments, along with roughly 70 condominium units. For purposes of worst case impact analysis, and to allow flexibility for potential future conversion to condominiums, the CEQA analysis on these units is being conducted as if the units are condominiums, which would generate a slightly more vehicle trips than would apartment units.

Tower Locations: The Conceptual Plan for the Approved Project anticipated the two towers on Parcel Q to be located at corners of 1st and Olive and 2nd and Grand. The Revised Project still anticipates two towers but relocates the towers to the corners of 1st and Grand and 2nd and Olive.

Height Envelope: The Revised Project makes slight revisions to the height envelope on Parcel Q that is analyzed for visual/aesthetic impacts. It should also be noted that these revisions are not substantive changes from the original plans but a correction to a discrepancy between the originally described height envelope and the originally proposed plans, which are also applicable to current plans. Tower

heights in the height envelope remain the same as in the Original Project (750 feet and 450 feet above Grand Avenue). However, the height envelope has been revised to anticipate slightly larger tower floor plates that occupy up to 15% of the site each (rather than 10% each). Similar to the height envelope analyzed in the Certified EIR, lower buildings are assumed to occupy the remainder of the site, with half of the remaining site area up to 150 feet above Grand Avenue and the other half up to 85 feet above Grand Avenue. These revisions to the height envelope are being made to ensure that the analysis includes the possibility that towers will exceed the footprints described in the Approved EIR. It should be noted that height envelope analyzed for EIR purposes is generated as a worst case analysis for purposes of analyzing potential visual/aesthetic impacts. Other development limitations and design parameters set forth in the project DDA, land use entitlements, and approved plans will continue to further limit building forms, height, and site coverage. For example, the height envelope analyzed includes buildings of varying heights on 100% of the site to provide for a conservative impact analysis. However, as a public plaza is required as part of the project DDA and approved plans, buildings will not occupy the entire site.

Access: The Revised Project now includes minor changes to certain driveways on Parcel Q. In particular, the originally proposed driveway on First Street remains in the same location, but will now be one-way ingress solely, compared to the previous two-way (ingress and egress) driveway analyzed in the Approved Project. The originally proposed two-way driveway on Olive Street remains in the same location. Turn restrictions of these two previously mentioned driveways remain as specified for the Approved Project. On Second Street, the two previously proposed driveways have been replaced with one driveway, which serves the same function. The remaining originally proposed driveway on Lower Grand Avenue will remain but will now only serve residential uses. Lastly, the originally proposed exit-only driveway on Lower Grand Avenue has now been eliminated.

Phasing: The order of phasing and the number of phases of development has been changed since certification of the EIR. The Civic Park was completed as first phase of development and the Parcels L and M-2 are currently under construction as two separate but overlapping phases of development. The next phase is anticipated to be construction of Parcel Q which will be constructed in one phase as originally anticipated. Remaining phases include one additional phase on the remainder of Parcel L that is not currently under construction, and the construction of Parcels W-1/W-2.

It should be noted that the project DDA, as currently being amended, includes a Scope of Development that is less than the maximum development program being studied in the Revised Project. The less intensive program in the DDA Scope is the currently anticipated development program. However, in order to provide a more comprehensive "worst case" analysis and to afford more flexibility in proceeding with the development in the future, the Revised Project includes a larger program that equates to the amount of traffic trips associated with the program approved in the Certified EIR.

Other than as described above, the Revised Project would not change any of the land uses and development parameters with respect to any other aspect of the Approved Project, including the Civic Park, Grand Avenue Streetscape Program, and development of Parcels W-1 and W-2. Lastly, all mitigation measures, compliance measures, and project design features proposed under the Approved Project would remain for the Revised Project.

Purpose of Checklist: Section 15162 of the CEQA Guidelines provides the scenarios for preparing a subsequent EIR and Negative Declaration after an EIR has been certified. Consistent with Section 15162, the brief analysis below demonstrates that 1) the Revised Project would not involve substantial changes that would result in new significant environmental effects or a substantial increase in the severity of significant effects previously identified in the Certified EIR, 2) that substantial changes with respect to the circumstances under which the Revised Project would be undertaken that would result in new significant environmental effects or a substantial increase in the severity of significant effects previously identified in the Certified EIR has not occurred, and 3) that new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, does not exist and is not presented in this document.

Additionally, Section 15164 of the CEQA Guidelines provides the authority for preparing an Addendum to a previously certified EIR or adopted Negative Declaration. As required in Subsection (e) of Section 15164, substantial evidence supporting the Lead agency's decision not to prepare a subsequent EIR pursuant to CEQA Guidelines Section 15162 is provided. The analysis below strictly relates to the changes associated with the Revised Project only. It should also be noted that the information below is focused as a post EIR certification Initial Study per Guidelines Sections 15162 and 15164. Thus, in accordance with the State CEQA Guidelines, preparation of a subsequent EIR to address the Revised Project would not be required based on the following analysis:

I. AESTHETICS. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	☐	■	☐	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?	☐	■	☐	☐
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	■	☐	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	■	☐	☐

Response a-d: The potential of the Revised Project to alter the visual physical environment will be analyzed in a document providing subsequent environmental review (the "Addendum"), and include an analysis of any required mitigation measures. That discussion is provided in the Addendum for full disclosure so the public and decision-makers can consider and evaluate this potential impact, even though Senate Bill No. 743, effective as of January 1, 2014, amended CEQA to provide that the aesthetics of a project located within one-half mile of a "transit priority area" (which may apply to the Revised Project) shall not be considered a significant impact under CEQA). Nevertheless, the Certified EIR concluded that visual quality, light and glare, and shade and shadow impacts would be less than significant with mitigation. A significant view impact was projected to occur with implementation of the Approved Project. For the Revised Project, the construction of buildings potentially 1,135 feet in height have the potential for significant impact views and scenic vistas given their new location at alternate intersections. There may be blocked public views of historic resources from vantage points near the Project Site or other public vantage points in and around downtown Los Angeles. However, there are no rock outcroppings on-site and the Site is not located within a state scenic highway. Additionally, the development of high-rise structures have the potential to create shade and shadow impacts upon the surrounding uses. Development of the Revised Project has the potential to introduce additional sources of light and glare onto the Site as well. Therefore, the Addendum will provide additional analysis of the Revised Project's potential to have adverse aesthetic impacts and any required mitigation measures. That analysis will be provided in the Addendum for full disclosure so the public and decision-makers can consider and evaluate this potential impact, even though Senate Bill No. 743, effective as of January 1, 2014, amended CEQA to provide that the aesthetics of a mixed use in a "transit priority area" (which may apply to the Revised Project) shall not be considered a significant impact under CEQA.

II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest Range and Assessment Project and Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

Resources Board. Would the project:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	■
b. Conflict the existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	■
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined by Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526, or timberland zoned Timberland Production (as defined by Government Code section 51104 (g)?	☐	☐	☐	■
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	■
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	■

Response a-e. A new significant impact may occur if the Revised Project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use, the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use, results in the rezoning of forest land or timberland, or involves other changes in the existing environment which, could result in conversion of Farmland, to non-agricultural use. The Project Site is not classified in any of these categories and is zoned for commercial and residential uses. As a result, the Certified EIR concluded that no impact would occur and this issue was not studied in the Certified EIR. Similar to the Approved Project, no further analysis of this issue is required for the Revised Project.

III.AIR QUALITY. Where applicable, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the SCAQMD Air Quality Management Plan or Congestion Management Plan?	☐	■	☐	☐
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	■	☐	☐
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	■	☐	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☐	■	☐	☐
e. Create objectionable odors affecting a substantial number of people?	☐	■	☐	☐

Response a. A new significant impact may occur if the Revised Project is not consistent with the applicable Air Quality

Management Plan (AQMP) or would represent in some way a substantial hindrance to employing the policies or obtaining the goals of that plan. The Certified EIR concluded that the Approved Project would be compatible with the air quality policies set forth in the AQMP and the City of Los Angeles General Plan with adherence to mitigation measures. All mitigation measures identified in the Certified EIR would apply to the Revised Project. The Revised Project would not alter growth assumptions upon which the regional AQMP was based since the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. Thus, the Revised Project would not alter the conclusions identified in the Certified EIR. No further analysis of this issue is required.

Response b. The Revised Project may have a new significant impact where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. The Certified EIR concluded that emissions from the Approved Project would exceed threshold levels and a significant regional air quality impact would occur even with implementation of mitigation measures. Nevertheless, construction and operation of the Revised Project would not alter emission levels discussed in the Certified EIR since the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. Thus, the Revised Project would not alter the conclusions identified in the Certified EIR. No further analysis of this issue is required.

Response c. A new significant impact may occur if the Revised Project would add a considerable cumulative contribution to federal or State non-attainment pollutant. The Certified EIR concluded that cumulative emissions would exceed threshold levels and a significant regional air quality impact would occur even with implementation of mitigation measures. Construction and operation of the Revised Project would not alter cumulatively considerable emission levels discussed in the Certified EIR. This is due to the overall amount of development proposed under the Revised Project, which would be the same or less than the Certified EIR. Thus, the Revised Project would not alter the conclusions identified in the Certified EIR. No further analysis of this issue is required.

Response d. A new significant impact may occur if the Revised Project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. For purposes of assessing air quality impacts, residential, senior citizen, and school uses are considered sensitive receptors, whose inhabitants are particularly sensitive to air pollution created by construction and operational activities. As discussed in the Certified EIR, with implementation of mitigation measures, pollutant concentrations would not negatively affect neighboring sensitive receptors and all potential impacts were found to be less than significant. The Revised Project would not increase short term construction impacts to sensitive receptors and would not increase the number of motor vehicles on nearby roadways analyzed in the Certified EIR, as the overall amount of development proposed is the same or less than the Approved Project. Thus, the Revised Project would not alter the conclusions identified in the Certified EIR. No further analysis of this issue is required.

Response e. A new significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. The Certified EIR concluded that all construction and operational related odor impacts would be less than significant with mitigation. Thus, the Revised Project would not alter the conclusions identified in the Certified EIR. No further analysis of this issue is required.

IV.BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	■

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	■
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	■
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	■
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	☐	☐	☐	■
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	■

Response a-d: Similar to the Approved Project, the Revised Project would not have an adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act because the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. The Revised Project would not interfere with the movement of any native resident or migratory fish or wildlife species and no impact would occur. No further analysis of this issue is required.

Response e. Similar to the Approved Project, the Revised Project would not be inconsistent with local regulations pertaining to biological resources, since the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. Implementation of the Revised Project would not affect any local policies or ordinances protecting or preserving biological resources and no impact would occur. No further analysis of this issue is required.

Response f. No approved local, regional, or state habitat conservation plans exist for the Site. Therefore, similar to the Approved Project, the Revised Project would not conflict with any local policies or ordinances protecting biological resources, or with the provisions of an adopted Habitat Conservation Plan. No impact would occur and further analysis of this issue is not required.

V. CULTURAL RESOURCES: Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA§15064.5?	☐	☐	☐	■
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?	☐	☐	☐	■
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	■
d. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	■

Response a. A project that may cause a new substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. Within the Approved Project area, there were several culturally and historically significant buildings identified, including the Walt Disney Concert Hall, the Music Center, the Stanley Most County Courthouse, the Cathedral of Our Lady of the Angels, and the Kenneth Hahn Hall of Administration. The existing Civic Center Mall was also identified as a contributor to the City's Civic Center historic district. The Certified EIR concluded that the Approved Project by itself would not create a significant impact to historical resources, although together with the related projects, has the potential to cause a significant cumulative impact to historical resources. Similar to the Approved Project, the Revised Project would not create a substantial adverse change in the significance of a historical resource, but would contribute cumulatively to a potential historical resource; however, impacts would not be increased since the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. Thus, the Project's potential to adversely impact the eligibility of resources will not be evaluated, since the proposed re-location of residential buildings on Parcel Q would not substantially increase the severity of any significant impact previously identified in the Certified EIR. The Revised Project would be designed in substantial compliance with the Civic Center Park and Streetscape Program identified in the Certified EIR. Mitigation measures adopted under the Certified EIR would apply to the Revised Project and would ensure that impacts would not significantly affect the potential or existing eligibility of adjacent historical structures.

Response b. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources. A new significant project-related effect could occur if the Revised Project were to affect archaeological resources. The Certified EIR concluded that all potential impacts to archaeological resources would be less than significant with mitigation. The Revised Project, even with its proposed new tower locations and inclusion of the same mitigation measures, would comply with all City, County, and State law with regards to encountering historical resources. Thus, the Revised Project would not alter the conclusions identified in the Certified EIR. No further analysis of this issue is required.

Response c. A new significant adverse effect could occur if grading or excavation activities associated with the Revised Project would disturb paleontological resources or geologic features which presently exist within the Site. The Certified EIR concluded that all potential impacts to paleontological resources or geologic features would be less than significant with mitigation. The Revised Project, even with its proposed new tower locations and inclusion of the same mitigation measures, would comply with all City, County, and State law with regards to encountering paleontological or geologic resources. Therefore, the Revised Project would not alter the less than significant conclusions identified in the Certified EIR. No further analysis of this issue is required.

Response d. A new significant adverse effect would occur if grading or excavation activities associated with the Revised Project were to disturb previously interred human remains. The Revised Project would include excavation during the construction of the project similar to the Approved Project. The Certified EIR concluded that the site is located in an urbanized area, which has not been previously disturbed or heavily affected by past activities, and while there is no evidence that human remains are located on the Site, there is still a possibility that the construction phase of the Approved Project could encounter human remains. As a result, the Approved Project recommended mitigation measures to reduce impacts to a less than significant level. Similarly, the Revised Project, with its altering tower locations, would not alter the conclusions identified in the Certified EIR and all mitigation measures would apply to the Revised Project. No further analysis of this issue is required.

VI.GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving :				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	■
ii. Strong seismic ground shaking?	☐	☐	☐	■
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☐	■
iv. Landslides?	☐	☐	☐	■
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	■
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	■
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	■
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	■

Response a.i-ii: A new significant impact may occur if the Revised Project is located within a State-designated Alquist-Priolo Zone or other designated fault zone, and appropriate building practices are not employed. Also, a new significant impact may occur if the Revised Project represents an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region. The Certified EIR adequately provided analysis to assess the possibility of the Site lying within an area of other known faults or other designated fault zones, and determined that the issue did not need to be analyzed in the Certified EIR. The Revised Project would not alter the no-impact conclusions identified in the Certified EIR and potential impacts would be similar because the overall amount and type of development proposed under the Revised Project would be the same or less than the Certified EIR. No further analysis of this issue is required.

Response a.iii: A new significant impact may occur if the Revised Project is located in an area identified as having a high risk of liquefaction and mitigation measures required within such designated areas are not incorporated into the project. The Certified EIR adequately provided analysis to assess the possibility of the Site having a high risk of liquefaction, and determined that the issue did not need to be analyzed in the Certified EIR. The Revised Project would not alter the no-impact conclusions identified in the Certified EIR and potential impacts would be similar because the overall amount and type of development proposed under the Revised Project would be the same or less than the Certified EIR. No further analysis of this issue is required.

Response a.iv: A new significant adverse effect may occur if the Revised Project is located in a hillside area with soil conditions that would suggest high potential for sliding. The Revised Project is not located in a hillside area with soil conditions that would suggest high potential for sliding. Similar to the Approved Project, the Revised Project would not alter the no-impact conclusions identified in the Certified EIR. No further analysis of this issue is required.

Response b-e: A new significant impact may occur if the Revised Project exposes large areas to the erosional effects of wind or water for a protracted period of time. Minor amounts of erosion and siltation could occur during project grading. Additionally, a significant impact may occur if a project is built in an unstable area, or on expansive soils, without proper Site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. The Certified EIR found that no further analysis of these issues was warranted and that the loss of topsoil and the lack of an unstable project site would not occur. Because the overall amount and type of development proposed under the Revised Project would be the same or less than the Certified EIR, the Revised Project would not alter the conclusions identified in the Certified EIR. No further analysis of these issues is required.

VII. GREENHOUSE GAS EMISSIONS Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact upon the environment?	☐	☐	■	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?	☐	☐	■	☐

Responses a-b: The Certified EIR did not contain a discussion of greenhouse gas emissions, either directly or indirectly. However, although greenhouse gas emissions were not routinely analyzed in 2007, information regarding potential harmful effects of those emissions was known at the time. The United Nations Framework Convention on Climate Change was established in 1992. The regulation of greenhouse gas emissions to reduce climate change impacts was extensively debated and analyzed throughout the early 1990s. The studies and analyses of this issue resulted in the adoption of the Kyoto Protocol in 1997. In the early and mid 2000s, GHGs and climate change were extensively discussed and analyzed in California. In 2000, SB 1771 established the California Climate Action Registry for the recordation of greenhouse gas emissions to provide information about potential environmental impacts. Therefore, the impact of greenhouse gases on climate change was known at the time of the certification of the EIR, and their impacts do not constitute "new information" which would require the preparation of a supplemental EIR under Guidelines Section 15162.

Nonetheless, the 2010 Addendum to the Final EIR analyzed greenhouse gas emission as it relates to Parcels L and M-2. The 2010 Addendum concluded that the Project at the time would be consistent with the provision of the AB 32 Scoping Plan, 2006 CAT Report, Title 24, and the AG's Office Guidance. As a result, the modified project analyzed in the 2010 Addendum did not conflict with adopted strategies and impacts were reduced to less than significant levels without mitigation. Since the Revised Project was not part of the analysis contained within the 2010 Addendum, the Revised Project will be fully evaluated for consistency with all applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of greenhouse gases and will be further discussed in the Addendum.

VIII. HAZARDS AND HAZARDOUS MATERIALS Would the project:	Potentially Significant	Potentially Significant Unless Mitigation	Less Than Significant	No Impact

	Impact	Incorporated	Impact	
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	❑	❑	❑	■
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	❑	❑	❑	■
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	❑	❑	❑	■
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	❑	❑	❑	■
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	❑	❑	❑	■
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	❑	❑	❑	■
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	❑	❑	❑	■
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	❑	❑	❑	■

Response a: A new significant impact may occur if the Revised Project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Certified EIR concluded that less than significant impacts would occur under both construction and operation of the Approved Project based on implementation of mitigation measures. Similarly, the Revised Project's construction activities are anticipated to use typical, although potentially hazardous, construction materials, including vehicle fuels, paints, mastics, solvents, and other acidic or alkaline solutions that would require special handling, transport, and disposal. The Revised Project would not alter the conclusions identified in the Certified EIR since the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR and the same mitigation measures would apply. No further analysis of this issue is required.

Response b: A new significant impact may occur if the Revised Project utilizes quantities of hazardous materials as part of its routine operations and could potentially pose a hazard to nearby sensitive receptors under accident or upset conditions. The Approved Project was not anticipated to result in a release of hazardous materials into the environment. The Revised Project, with its altering tower locations and similar or less development square footages, would not alter the conclusions identified in the Certified EIR. No further analysis of this issue is required.

Response c: The Revised Project is not within one-quarter mile of a primary or secondary school. No impacts involving schools would occur, and no further analysis in the Addendum is required similar to the Approved Project.

Response d: California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous

waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. The Certified EIR concluded that less than significant impacts would occur under both construction and operation of the Approved Project as it relates to underground storage tanks. The Revised Project would not alter the conclusions identified in the Certified EIR since the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. No further analysis of this issue is required.

Responses e & f: The Revised Project is not located near a private airstrip similar to the Approved Project. No impacts involving airports would occur, and no further analysis is required.

Response g: A new significant impact may occur if the Revised Project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. Similar to the Approved Project, the Revised Project has the potential to impede public access or travel upon public rights-of-way as well as interfere with any adopted emergency response plan or emergency evacuation plan. However, the Revised Project, which has an overall amount of development that is the same or less than the Certified EIR, would not alter the conclusions identified in the Certified EIR and the same mitigation measures would apply. Thus, no further analysis of this issue is required.

Response h: A new significant impact may occur if the Revised Project is located in proximity to wildland areas and poses a potential fire hazard, which could affect persons or structures in the area in the event of a fire. As was the case with the Approved Project, the Revised Project would not be located in proximity to Wildland areas and would not pose a potential fire hazard, similar to the conclusions identified in the Certified EIR. No further analysis of this issue is required.

IX. HYDROLOGY AND WATER QUALITY. Would the proposal result in:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements?	☐	☐	☐	■
b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	☐	☐	☐	■
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☐	■
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in an manner which would result in flooding on- or off site?	☐	☐	☐	■
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	■
f. Otherwise substantially degrade water quality?	☐	☐	☐	■

g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	❑	❑	❑	■
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?	❑	❑	❑	■
i. Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?	❑	❑	❑	■
j. Inundation by seiche, tsunami, or mudflow?	❑	❑	❑	■

Response a-b: A new significant impact may occur if the Revised Project discharges water which does not meet the quality standards of agencies that regulate surface water quality and water discharge into storm water drainage systems. Also, a significant impact may occur if existing groundwater becomes contaminated due to recharge or excavations. A new significant impact would also occur if the Revised Project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). The Certified EIR did not discuss potential impacts to hydrology and water quality since the Initial Study for the Certified EIR determined that no significant impacts would occur. Similarly, the Revised Project would not alter the conclusions identified in the Certified EIR since the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. Thus, no further analysis of this issue is required.

Response c-d: A new significant impact may occur if the Revised Project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project. Additionally, a new significant impact may occur if the Revised Project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the project Site or nearby properties. As mentioned above, the Certified EIR did not discuss potential impacts to hydrology and water quality since the Initial Study for the Certified EIR determined that no significant impacts would occur. The Revised Project would not alter the conclusions identified in the Certified EIR since the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. Further, the new locations for both towers on Parcel Q would not cause potential impacts in drainage patterns or erosion because the entire site, regardless of the eventual location of the towers, would create no impacts. The Revised Project would similarly not alter drainage patterns nor increase runoff volumes during both construction and operation, as the existing non-pervious site would continue to operate as a non-pervious use. Additionally, the Revised Project would construct new and improved on-site drainage mechanisms along with siltation devices to help alleviate runoff volumes. Thus, no further analysis of this issue is required.

Response d-f: A new significant impact may occur if 1) the Revised Project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the project Site or nearby properties; 2) the Revised Project would increase the volume of storm water runoff to a level which exceeds the capacity of the storm drain system serving a project Site; and 3) the Revised Project could involve the use of contaminants that could potentially degrade water quality if not properly handled and stored. Similar to the Approved Project, grading and construction activities on the project Sites may temporarily alter the existing drainage patterns of the Site and reduce off-Site flows. The Certified EIR did not discuss these issues in the Draft EIR since no impacts were concluded to occur. Similarly, the Revised Project would not alter the conclusions identified in the Certified EIR since the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. Thus, no further analysis of this issue is required.

Response g-h: The Revised Project Site is not located within an area identified by Federal Emergency Management Agency (FEMA) as potentially subject to 100-year floods. The Project Site is not located within a City-designated 100-year or 500-year flood plain. Similar to the conclusion identified in the Certified EIR, no impact would occur and no further analysis of this issue is required because the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. Thus, no further analysis of this issue is required in the Addendum.

Response i: Similar to the conclusion identified in the Certified EIR, no impact would occur and no further analysis of this issue is required because the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. Thus, no further analysis of this issue is required.

Response j: The Revised Project Site is not located in a Tsunami Hazard Area, and it is located at least 11 miles from the Pacific Ocean and is not near any other major water bodies. Similar to the conclusion identified in the Certified EIR, no impact would occur and no further analysis of this issue is required because the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. Thus, no further analysis of this issue is required in the Addendum.

X.LAND USE AND PLANNING. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	❑	❑	❑	■
b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	❑	❑	❑	■
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	❑	❑	❑	■

Response a: A new significant impact may occur if the Revised Project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project that involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community). The Certified EIR concluded that the Approved Project, with mitigation, would not divide an established community, given the type of proposed land uses to be implemented under the Certified EIR and the configuration and nature of the surrounding sues. Similar to the Approved Project, with implementation of the same mitigation measures, the Revised Project would not result in an impact to the established community and no further analysis of this issue is required.

Response b: A new significant impact may occur if the Revised Project is inconsistent with the City's General Plan. The Certified EIR concluded that with the potential granting of zone changes and variance, which would be granted after certification of the Final EIR by the Lead Agency, potential significant zoning and policy impacts would be eliminated. However, since the Approved Project was not in compliance with the current zoning during the drafting of the EIR, it was concluded that there would be a significant project and cumulative impact relative to zoning. Similar to the Approved Project, the Revised Project has the potential to conflict with applicable land use plans, policies, or regulations. However, since the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR, no impacts would occur and the Revised Project would not alter the conclusions identified in the Certified EIR. Also, the City of Los Angeles has since approved the aforementioned zone change for the Project Site. Thus, no further analysis of this issue is required.

Response c: As discussed in Question IV(f) above, no habitat conservation plans or natural community conservation plans presently exist which govern any portion of the project Site. The Certified EIR concluded that the project Site is located in an area that has been previously disturbed and graded and less than significant impacts would occur. Therefore, the Revised Project would not have the potential to conflict with any applicable habitat conservation plan or natural community conservation plan because the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. No impact would occur and no further analysis of this issue is required.

XI. MINERAL RESOURCES. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	■
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	■

Response a-b: The Revised Project is not located near any oil fields and no oil extraction activities have historically occurred on or are presently conducted at the project Site. The Certified EIR did not include an analysis of mineral resources, as the Draft EIR Initial Study concluded that no impacts would occur. Furthermore, the project Site is not in an area identified by the City of Los Angeles as containing a significant mineral deposits site that would be of value to the region and the residents of the state. As a result, the Revised Project would not alter the conclusions identified in the Certified EIR since the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. Thus, no further analysis of this issue is required.

XII. NOISE. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	■	☐	☐
b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	☐	■	☐	☐
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	■	☐	☐
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	■	☐	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	■
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	■

Response a: The Certified EIR concluded that Project and cumulative construction activities would intermittently increase the daytime noise levels at nearby sensitive receptors by more than the 5-dBA significance threshold. All other noise impacts, including operational noise, were reduced to less than significant levels with mitigation in the Certified EIR. Construction of the Revised Project would incorporate the same Certified EIR mitigation measures and would require the use of construction equipment during grading, hauling, establishing building foundations, installation of utility lines and services, and other construction activities. Thus, the Revised Project would not alter the conclusions identified in the

Certified EIR. No further analysis of this issue is required.

Response b: A new significant impact would occur if the Revised Project exposed people to or generated excessive groundborne vibration or groundborne noise levels. The Certified EIR concluded that the rumbling sound caused by vibration of room surfaces (or groundborne noise) during construction would be less than significant. The ground motion caused by vibration is measured as particle velocity in inches per second and in the U.S. is referenced as vibration decibels (VdB). Overall, the Revised Project would incorporate the same mitigation measures as identified in the Certified EIR, and would not alter the conclusions because the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. Thus, the Revised Project would not alter the conclusions identified in the Certified EIR. No further analysis of this issue is required in the Addendum.

Response c-d: A new significant impact may occur if the Revised Project were to result in a substantial temporary or permanent increase in ambient noise levels in the project vicinity above levels existing without the Revised Project. Construction during all phases of development, as well as traffic and human operational activity associated with the Approved Project, were found to create less than significant impacts as it relates to an increase ambient noise levels above existing levels. Mitigation was also proposed for the Approved Project and would apply to the Revised Project to help reduce potential impacts. Thus, the Revised Project would not alter the conclusions identified in the Certified EIR. No further analysis of this issue is required in the Addendum.

Response e: A new significant impact may occur if the Revised Project were located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or near the project Site. The Revised Project's Site is not located within an airport land use plan similar to the Approved Project. The nearest airport to the Revised Project Site is the Burbank-Glendale-Pasadena Airport, which is located approximately 6.2 miles to the north. Therefore, no impact would occur and no further analysis of this issue is required.

Response f: A new significant impact may occur if the Revised Project is within the vicinity of a private airstrip. The Revised Project Site is not located in the vicinity of a private airstrip. Therefore, similar to the conclusion identified in the Certified EIR, no impact would occur and no further analysis is required.

XIII.POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	■
b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	☐	☐	☐	■
c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	☐	☐	☐	■

Response a: A new significant impact may occur if the Revised Project were to locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing population growth that would otherwise not have occurred as rapidly or in as great a magnitude. The Certified EIR concluded that the Approved Project's growth would be a small percentage of projected growth and would not exceed adopted SCAG forecasts. Similarly, the Revised would not alter the conclusions identified in the Certified EIR because the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. Thus, no further analysis of this issue is required.

Response b: A new significant impact may occur if the Revised Project would result in displacement of existing housing,

necessitating construction of replacement housing elsewhere. Similar to the Approved Project, no housing would be displaced under the Revised Project. Thus, the Revised Project would not alter the conclusions identified in the Certified EIR because the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. No further analysis of this issue is required.

Response c: A new significant impact may occur if the Revised Project would result in the displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere. Less than significant impacts would occur under the Approved Project because the demolition would not involve the displacement of any residential uses, as none are currently developed on Site. The Revised would not alter significance conclusions. As such, no further analysis of this issue is required.

XIV. PUBLIC SERVICES.

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Fire protection?	☐	☐	☐	■
Police protection?	☐	☐	☐	■
Schools?	☐	☐	☐	■
Parks?	☐	☐	☐	■
Other Public facilities?	☐	☐	☐	■

Response a:

Fire Protection: A new significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve the Revised Project based upon response time, access, or fire hydrant/water availability. Less than significant with mitigation project and cumulative impacts were concluded in the Certified EIR because automatic fire sprinklers were proposed in all structures, fire hydrants were required to be installed to LAFD specifications, and the site was within the service area of four Task Force truck and engine companies. Since the Revised Project incorporates the same mitigation measures, does not alter the proposed residential population on the site, and is inherently similar in development size and tower design, no significant project and cumulative impacts are expected to occur under the Revised Project. For a discussion of related projects identified in the Certified EIR compared against potential related projects under current conditions, please reference Response B below under Section XVII., Mandatory Findings of Significance. Thus, no further analysis is needed.

Police Protection: A new significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve the Revised Project, necessitating a new or physically altered station. If existing service capacities are exceeded, new facilities, equipment and/or personnel may be required to maintain acceptable response times and service levels. The Certified EIR concluded that the level of increased demand under the Approved Project would not substantially exceed LAPD's capacity and would, thus, be less than significant with incorporation of proposed mitigation measures. Similar to the Approved Project, no significant project or cumulative impact would occur under the Revised Project with incorporation of the same mitigation measures, since the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. For a discussion of related projects identified in the Certified EIR compared against potential related projects under current conditions, please reference Response B below under Section XVII., Mandatory Findings of Significance. No further analysis is needed.

Schools: A new significant impact may occur if the Revised Project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The Certified EIR concluded that a potentially significant project impact with regard to seating shortages would occur to elementary school students. Nevertheless, this impact was reduced to a less than significant level with adherence to mitigation. Pursuant to California Government Code Section 65995, payment of the developer fees required by State law provides full and complete mitigation of the impacts of the Approved Project. Similar to the Certified EIR, since the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR, and the same mitigation would apply to the Revised Project, no new significant project or cumulative impact would occur. For a discussion of related projects identified in the Certified EIR compared against potential related projects under current conditions, please reference Response B below under Section XVII., Mandatory Findings of Significance. No further analysis is needed.

Parks: A new significant impact would occur if the available City of Los Angeles Department of Recreation and Parks (LADRP) recreation and park services could not accommodate the Revised Project, necessitating new or physically altered facilities, the construction of which could cause significant environmental impacts. The Certified EIR concluded that potential short term construction project impacts could occur and adversely affect park usage. All other potential park impacts were identified to be less than significant because the Approved Project would be required to comply with the Quimby Act. It should be noted that since certification of the Approved Project EIR, the proposed Civic Park has since been constructed (and named Grand Park). This park would add additional park space available to the surrounding population, which was not discussed in the Certified EIR. Thus, since the Revised Project does not alter the proposed residential population on the site or induce additional park space, and the same mitigation measure would be carried over to the Revised Project, no new significant project or cumulative impact would occur. For a discussion of related projects identified in the Certified EIR compared against potential related projects under current conditions, please reference Response B below under Section XVII., Mandatory Findings of Significance. No further analysis is needed.

Other Public Facilities: The Project Site is served by the Los Angeles Public Library System. The Certified EIR concluded that the Approved Project would not cause a significant project or cumulative impact on library services without mitigation. Since the Revised Project does not alter the proposed residential population on the site or induce population growth not identified in the Certified EIR, no new significant project or cumulative impact would occur. For a discussion of related projects identified in the Certified EIR compared against potential related projects under current conditions, please reference Response B below under Section XVII., Mandatory Findings of Significance. No further analysis is needed.

XV. RECREATION.	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	■
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	■

Response a: A new significant impact may occur if the Revised Project would include substantial employment or population growth that could generate an increased demand for public park facilities which exceeds the capacities of existing parks and/or causes premature deterioration of the park facilities. The Certified EIR concluded that less than significant project and cumulative operational impacts would occur with compliance with applicable law and implementation of mitigation measures. Similar to the Approved Project, Revised Project impacts would be less than significant with the same mitigation measures because the Revised Project would not increase the projected use of existing

neighboring and regional parks since the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. Thus, no new significant project or cumulative impact would occur under the Revised Project. For a discussion of related projects identified in the Certified EIR compared against potential related projects under current conditions, please reference Response B below under Section XVII., Mandatory Findings of Significance. No further analysis is needed.

Response b: Development of the Revised Project has the potential to increase demands upon recreational facilities that may require the construction of new facilities or expansion of recreation facilities. The Certified EIR concluded that cumulative construction impacts on recreational resources were unavoidable and significant, although short-term in nature. This was mainly due to the development and operation of Grand Park, which has since been fully developed, and not the construction of development parcels associated with the Approved Project. Even with the operation of Grand Park near the Revised Project Site, the Revised Project would not create short-term construction impacts and would not increase those impacts identified in the Certified EIR, since the overall amount of development proposed under the Revised Project would be the same or less. Thus, no further analysis is needed.

XVI. TRANSPORTATION/CIRCULATION. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☐	■
b. Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	■
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	■
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	■
e. Result in inadequate emergency access?	☐	☐	☐	■
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	■

Response a-b: The Certified EIR concluded that all of the impacted intersections would continue to operate at LOS D or better, except for two that would operate at LOS E in the PM peak hour, and two that would operate at LOS F in the PM peak hour. Traffic impacts identified for the Revised Project would be similar or less than those identified in the Approved Project (please see attached Appendix 1, Traffic Memorandum to LADOT, to this Initial Study from The Mobility Group). The potential of the Revised Project to cause a substantial increase in traffic in relation to existing traffic loads and capacity will not be analyzed in the Addendum because the Revised Project does not propose uses or design configurations that would trigger the need for additional traffic analyses. An evaluation was performed on the Revised Project, which concludes the following: 1) that the trip generation from the Revised Project does not exceed the trip totals for the project analyzed in the 2006 EIR; 2) that the circumstances affecting the Project's traffic impacts, namely, the existing traffic in the

relevant geographic area and future traffic associated with related projects, have not substantially changed; 3) that the Revised Project's access and circulation is essentially the same as the Approved Project site plan, and 4) that the Revised Project would not cause any new significant traffic impacts or a substantial increase in a previously identified impact, but would rather eliminate one significant impact identified in the Certified EIR. Thus, potential impacts under the Revised Project would be similar or less than those under the Approved Project and no changes to mitigation measures are necessary to reduce any new significant impact associated with the Revised Project. These mitigation measures were previously found to be feasible in the Certified EIR and are not being presented to result in a considerably different effect on the environment. Thus, no new significant impacts would occur and no further analysis is needed. However, it should be noted that a proposed change in the timing of implementation of certain traffic mitigation measures will be analyzed in Addendumthe Addendum.

Response c: The Approved Project did not contain any aviation-related uses, and the Revised Project would not include the development of any aviation-related uses. Thus, the Revised Project would have no impact on air traffic patterns, and no further analysis of this issue is required.

Response d-e: Similar to the Approved Project, the Revised Project would include the construction of new ingress and egress driveways from the surrounding streets to access the proposed parking structures. These ingress and egress driveways would be altered slightly from those analyzed in the Certified EIR, which concluded less than significant circulation impacts. According to the Traffic Memorandum to LADOT (Appendix 1), there may be the potential for the slightly revised access and egress routes to cause new significant traffic impacts at nearby intersections. As discussed in Appendix 1, and in order to evaluate this potential impact, an analysis was conducted of the eight intersections closest to the Project Site. It should be noted that this analysis followed the same procedures used in the Certified EIR Traffic Study. Overall, it was found that there would be no new significant intersection traffic impact caused by the Revised Project driveway configurations. In fact, there would be one less significant impact in the PM peak hour when compared to the Certified EIR. Thus, no impact would occur and no further analysis is needed.

Response f: The Certified EIR concluded that there will be no conflict with adopted policies or that the Approved Project would involve modification of existing alternative transportation facilities due to implementation. Similarly, the Revised Project would not conflict with adopted policies since the overall amount of development proposed under the Revised Project and associated trips would be the same or less than the Certified EIR. Thus, no impact would occur and no further analysis is needed.

XVII. UTILITIES. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	■
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	■
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	■
d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	☐	☐	☐	■
e. Result in a determination by the wastewater treatment provider				

which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	■
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	■
g. Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	■

Response a: A new significant impact would occur if the Revised Project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board. The Los Angeles Regional Water Quality Control Board (LARWQCB) enforces wastewater treatment and discharge requirements for properties in the project area. The Certified EIR concluded that the Approved Project and related projects would not substantially exceed the future scheduled capacity of the Hyperion Treatment Plan, nor would it cause a measurable increase in wastewater flows with incorporation of mitigation measures. All mitigation measures identified in the Certified EIR would apply to the Revised Project. Therefore, the Revised Project would not alter the conclusions identified in the Certified EIR because the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. For a discussion of related projects identified in the Certified EIR compared against potential related projects under current conditions, please reference Response B below under Section XVII., Mandatory Findings of Significance. No further analysis of this issue is required.

Response b: A new significant impact may occur if the Revised Project would increase water consumption or wastewater generation to such a degree that the capacities of facilities currently serving the project Site would be exceeded. The Certified EIR concluded that the Approved Project, with mitigation, would not substantially exceed identified future water consumption or wastewater generation projections and potential project and cumulative impacts were found to be less than significant. The Revised Project would incorporate the same mitigation measures and would not alter the conclusions identified in the Certified EIR because the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. For a discussion of related projects identified in the Certified EIR compared against potential related projects under current conditions, please reference Response B below under Section XVII., Mandatory Findings of Significance. No further analysis of this issue is required.

Response c: A significant impact may occur if the volume of storm water runoff increases to a level exceeding the capacity of the storm drain system serving the project Site, to the extent that existing facilities would need to be expanded. The Certified EIR concluded that the Approved Project, with mitigation measures, would not substantially increase the volume of stormwater runoff to a level exceeding the capacity of the surrounding storm drain system and potential impacts were found to be less than significant. The Revised Project would use the same mitigation measures in the Approved Project and would not alter the conclusions identified in the Certified EIR because the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. No further analysis of this issue is required.

Response d: A new significant impact may occur if the Revised Project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The Certified EIR concluded that the Approved Project and related projects would not substantially increase water consumption so that new water sources would need to be identified and potential impacts were found to be less than significant with incorporation of mitigation measures. The Revised Project would incorporate the same mitigation measures and would not alter the conclusions identified in the Certified EIR because the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. For a discussion of related projects identified in the Certified EIR compared against potential related projects under current conditions, please reference Response B below under Section XVII., Mandatory Findings of Significance. No further analysis of this issue is required.

Response e: A new significant impact may occur if the Revised Project would increase wastewater generation to such a degree that the capacity of facilities currently serving the project Site would be exceeded. The Certified EIR concluded that the Approved Project and related projects would not substantially exceed the future scheduled capacity of the Hyperion

Treatment Plan, nor would it create the need for a facility to be constructed to serve the Approved Project. The Revised Project and related projects would not alter the conclusions identified in the Certified EIR because the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. For a discussion of related projects identified in the Certified EIR compared against potential related projects under current conditions, please reference Response B below under Section XVII., Mandatory Findings of Significance. No further analysis of this issue is required.

Response f-g: A new significant impact may occur if the Revised Project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Also, a significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The Certified EIR concluded that the Approved Project, with mitigation, would create a less than significant project and cumulative impact, as the Approved Project would generate roughly 7,012 tons of solid waste per year, which would constitute less than 0.001 percent of the City's annual tons of total solid waste. Additionally, the Approved Project would dispose of all solid waste in accordance with City and State laws and regulations. The Revised Project would incorporate the same mitigation measures and would not alter the conclusions identified in the Certified EIR because the overall amount of development proposed under the Revised Project would be the same or less than the Certified EIR. For a discussion of related projects identified in the Certified EIR compared against potential related projects under current conditions, please reference Response B below under Section XVII., Mandatory Findings of Significance. No further analysis of this issue is required.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	❑	❑	❑	■
b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	❑	❑	❑	■
c. Does the project have environmental effects, which cause substantial adverse effects on human beings, either directly or indirectly?	❑	❑	❑	■

Response a: A new significant impact may occur if the Revised Project would degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Similar to the Approved Project, the Revised Project site is devoid of any natural vegetation and does not provide any suitable habitat to support riparian habitat or sensitive species. Thus, the Revised Project's potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory is less than significant. No further analysis of this issue is required.

Response b: A new significant impact may occur if the Revised Project, in conjunction with other related projects in the area of the Project, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. The number and type of related projects identified under the Certified EIR is generally the same as those related projects under current conditions, as discussed in detail in the attached Traffic Memorandum to LADOT from The Mobility Group. Overall, the Certified EIR adequately addressed cumulative impacts for each impact category identified in items I through XVII, above.

Response c: A new significant impact may occur if the Revised Project has the potential to result in significant impacts, as discussed in the preceding sections. As identified in this Initial Study, the Revised Project has the potential to result in significant impacts attributable to deferred traffic mitigation measure implementation and Aesthetics. Impacts to these CEQA categories will be formally addressed in the Addendum to the Certified EIR. Greenhouse gas emissions will also be analyzed in the Addendum, as Parcel Q was not part of the greenhouse gas emissions discussion analyzed in the 2010 Addendum.

XVIV. PARKING. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in inadequate parking capacity?	❑	❑	❑	■

Response a: A new significant impact may occur if the Revised Project would result in a development with inadequate parking. Currently, the Initial Study checklist provided in the State CEQA Guidelines does not discuss potential parking impacts. However, since parking was analyzed in the Certified EIR, the potential parking impacts of the Revised Project are discussed in this Initial Study. The Certified EIR concluded that impacts would be less than significant to parking since the Approved Project originally proposed 1,267 parking spaces for Parcel Q. Potential parking impacts identified for the Revised Project would be similar to those identified in the Approved Project based on an updated analysis by The Mobility Group). That updated analysis d follows the same procedures that were used in the Certified EIR for determining adequate parking. The proposed on-site parking supply for Parcel Q under the Revised Project will be sufficient to accommodate projected demand during the weekday daytime, but will not be sufficient during weekday evenings and at weekends. However, the parking demand would exceed the on-site supply for the commercial uses only, and the projected shortfall is similar to the shortfall projected in the Certified EIR for Parcel Q. The Parcel Q weekday evening and weekend deficits cannot be accommodated by other Approved Project parcels. But, as concluded in the Certified EIR, this deficit (which is very similar to the Approved Project) could be easily accommodated by the considerable surplus parking capacity that exists at evenings and weekends in many of the parking garages on Bunker Hill — particularly the office building garages within a few blocks of the Revised Project. Use of this publicly available parking would be an effective use of existing resources and avoid providing an over-supply of parking in the area. Lastly, the Certified EIR concluded there would be no significant off-street parking supply impacts. Based on the updated parking analysis for the Revised Project, it is similarly concluded there would be no significant off-street parking supply impacts. Thus, potential impacts under the Revised Project would be similar or less than those under the Approved Project and no changes to mitigation measures are necessary or proposed under the Revised Project. Thus, no new significant impacts would occur and no further analysis is needed.

SECOND ADDENDUM TO THE CERTIFIED EIR

THE GRAND AVENUE PROJECT

APPENDIX 1 TO THE POST EIR – INTIAL STUDY AND CHECKLIST

The Mobility Group
Transportation Strategies & Solutions

Memorandum

To: Tomas Caranza, LADOT

From: Michael Bates

Subject: Grand Avenue Project – Updated Traffic Assessment for Parcel Q

Date: February 3, 2014

The Grand Avenue Project was approved by the City of Los Angeles in 2007. The EIR was certified in 2006 by the Joint Powers Authority as Lead Agency, including a Traffic Study dated May 30, 2006. The Project Site Plan as processed in the 2006 EIR is shown in Figure 1, and covers four downtown blocks known as Parcel Q, Parcel W and Parcel L/M-2.

Since 2006 two phases of the project have moved forward and are currently under construction on Parcel L/M-2. These are the Broad Museum, and a 271-unit apartment residential building.

The developer, Grand Avenue L.A., LLC (an affiliate of Related California and The Related Companies, L.P.), is now proposing a project change to the Los Angeles Grand Avenue Authority ("Authority"), in order to move forward with development on Parcel Q. The change in Project Description is primarily limited to Parcel Q along with some previously approved changes to Parcel L/M-2 ("Revised Project").

The purpose of this memorandum is to evaluate the effect on the 2006 EIR traffic analysis attributable to changes in (i) the proposed development program for Parcel Q and (ii) the surrounding environment relative to the projections and assumptions made in the 2006 EIR. In summary, our assessment demonstrates:

- That the trip generation from the Revised Project does not exceed the trip totals for the project analyzed in the 2006 EIR ("Original Project").
- That the circumstances affecting the Project's traffic impacts, namely, the existing traffic in the relevant geographic area and future traffic associated with related projects, have not substantially changed.

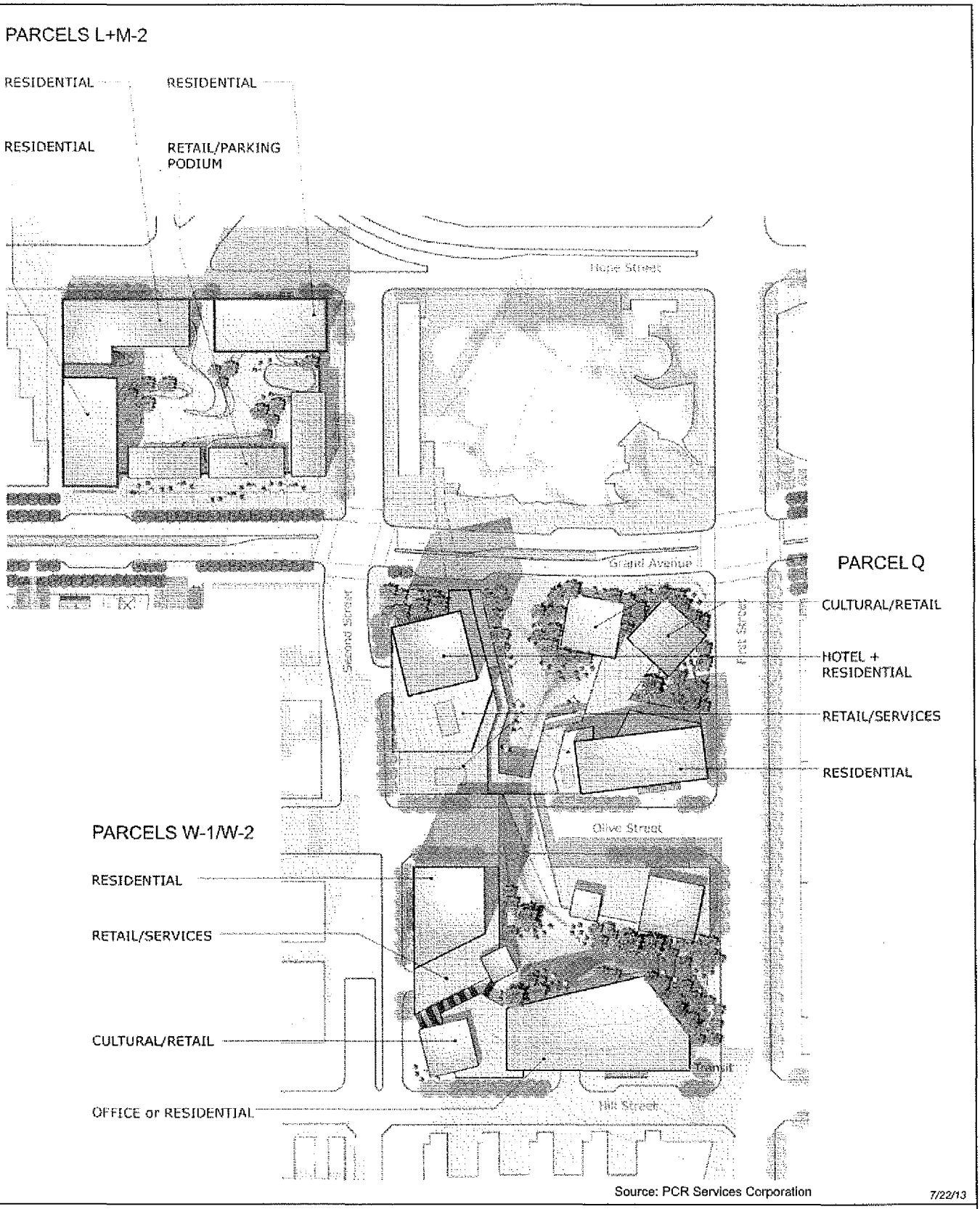


Figure 1
Conceptual Parcel Development Plan - 2006 EIR

Grand Avenue Parcel Q Update

The **Mobility** Group
Transportation Strategies & Solutions

- That the Revised Project would not cause any new significant traffic impacts or a substantial increase in a previously identified significant traffic impact, and therefore, no additional traffic analysis is necessary.

The remainder of this memorandum provides documentation to support these conclusions.

Project Description Comparison

A comparison of the Original Project and the Revised Project is shown in Table 1. Though it is anticipated that the Disposition and Development Agreement (DDA) for the Project, as currently being proposed, will include a scope of development that is less than the maximum being studied in the Revised Project, we are undertaking the analysis on the Revised Project in order to provide a more comprehensive "worst case" analysis and to afford more flexibility in proceeding with the development in the future. The Revised Project incorporates the following changes for the Approved Project studied in the original EIR:

Parcel Q

The event facility has been eliminated. The total number of condominiums and apartments has reduced slightly, and the number of hotel rooms has increased slightly. The grocery store size has been significantly reduced. There are changes in the retail commercial square footage (reduction) and the restaurant square footage (increase). The health club use has reduced slightly.

Project driveways and access/egress remains essentially the same, with slight modifications. The driveway on First Street remains in the same location, but will now be one-way in only compared to two-way (in and out) in the Original Project. The driveway on Olive Street remains in the same location and a two-way driveway. Turn restrictions at these two driveways remain as specified for the Original Project. On Second Street, the two driveways have been replaced with one driveway, which serves the same functions. There remains a driveway on Lower Grand Avenue, but this now serves only residential uses and the commercial exit-only driveway has been eliminated.

Parcel W

There are no changes to the Project description for this parcel.

Table 1 Grand Avenue Parcel Q Update - Land Use Program Comparison 12/11/2013

Land Use	Units	Original Program (2006 EIR)	Revised Program (2013 Update)
Parcel Q			
Condominiums	D.U.	400	360
Apartments	D.U.	100	90
Hotel	Rooms	275	300
Market	S.F.	53,000	10,000
Retail	S.F.	97,750	85,000
Restaurants	S.F.	42,000	85,000
Event Facility	Seats	250	-
Health Club	S.F.	50,000	40,000
Office	S.F.	-	50,000
Parcel W-1/W-2			
Condominiums	D.U.	568	568
Apartments	D.U.	142	142
Office	S.F.	681,000	681,000
Retail	S.F.	54,400	54,400
Restaurant	S.F.	10,000	10,000
Parcel L/M-2			
Condominiums	D.U.	680	645
Apartments	D.U.	170	271
Museum	S.F.	-	115,231
Retail	S.F.	73,100	-
Restaurant	S.F.	15,000	15,000

Parcel L/M-2

Two projects are currently under construction on this parcel - the Broad Museum comprising a total of 115,231 sq. ft. (not in the original Project), and a 271 unit apartment building (101 more apartments than in the original Project). On the remainder of the parcel, the total restaurant square footage will remain the same as originally proposed. In order to remain within the overall project trip totals in the EIR, the number of condominiums has been reduced and the retail (non-restaurant) uses have been eliminated in the Revised Project. Six hundred and forty five (645) condominiums are being retained on Parcels L/M-2 in the Revised Project for the purposes of preserving trips previously analyzed on this parcel in the Original Project in order to preserve flexibility for potential future land use conversions and future development of the remaining developable portion of Parcel L/M-2 (on Hope Street frontage of Parcel L).

Trip Generation Comparison – Original Project and Revised Project

The EIR and entitlements for the Original Project included an Equivalency Program that allows the composition of on-site development to be modified to respond to future needs in a manner that does not increase the Project's impacts on the environment. Within this framework, land uses can be exchanged for certain other permitted land uses so long as the limitations of the Equivalency Program are satisfied and no additional environmental impacts occur. All permitted land use increases can be exchanged for corresponding decreases of other land uses under the proposed Equivalency Program.

In the context of traffic circulation and impacts, this relates to the overall number of trips generated by the Project, and allows land use exchanges as long as the total number of peak hour trips generated does not exceed the totals identified in this study. Land use conversion factors based on trip equivalencies were included in the EIR for the Original Project, which were based on the net trip generation rates in the EIR Traffic Study.

This method was effectively used in this analysis to evaluate potential effects of land use changes. However, the equivalency ratios are based on overall trip rates for the entire project, while the trip generation analysis in the EIR was based on trip rates specific to the land uses by block. Because the Revised Project incorporates a number of land use changes across two blocks of the Project, the final analysis of the Revised Project was therefore based on trip generation estimates calculated directly from revised land use quantities and the trip rates for each land use by block - using the exact same methodology as in the EIR, as described below

and shown in Appendices A and B. This is a more accurate procedure and is still consistent with the equivalency factors in the EIR.

The results of the trip generation analysis prepared for the Revised Project are shown in Table 2, which shows the vehicle trip totals for the AM peak hour, PM peak hour and daily totals, by parcel, for the Original Project and for the Revised Project. As can be seen in the table, the trip totals for the Revised Project are the same or less than the trip totals in the 2006 EIR. Detailed trip generation tables are shown in Appendix A for the 2006 EIR and in Appendix B for the Revised Project.

Existing Traffic

To compare the amount of existing traffic in the relevant geographic area under current conditions against the existing traffic counts used in the 2006 EIR, we evaluated the baseline traffic conditions calculated in two recent major studies in downtown Los Angeles - the Convention Center Modernization and Farmers Field (CCM&FF) EIR and the Los Angeles Street Civic Building EIR. The CCM&FF EIR addressed the Los Angeles Convention Center Modernization and the proposed Farmers Field Event Center (football stadium). The LA Street Civic Building project proposes to redevelop the vacant Parker Center building adjacent to City Hall East along Los Angeles Street. The Los Angeles Street Civic Building EIR addresses three alternatives, with Alternative 3 being the most intensive and creating the most traffic trips – the demolition of the existing building and construction of approximately 712,500 sq.ft. of government office, 35,000 sq.ft. of commercial space, and a 2,500 sq.ft. day care facility. In order to conduct a conservative analysis, the Alternative 3 information was used in this traffic assessment.

Traffic Counts

The Grand Avenue EIR Traffic Study (May 2006) addressed 32 intersections. The CCM&FF counts were conducted in March/April 2011 (PM peak hour only), and the LA Street Civic Building EIR counts were conducted in June 2012 (for both the AM and PM peak hours).

The existing conditions traffic count information in each of the three studies was compared for a sample of 10 key intersections that were common to all three studies, as shown in Figure 2. These intersections are both adjacent to the Grand Avenue Project Site and within the EIR study area, and represent sufficient geographic coverage within the study area, including: key intersections along 1st Street adjacent to the Revised Project, intersections both with and without significant impacts in the Grand Avenue EIR, and locations where comparison data were available from all three traffic studies.

Table 2 Grand Avenue Parcel Q Update - Trip Generation Comparison

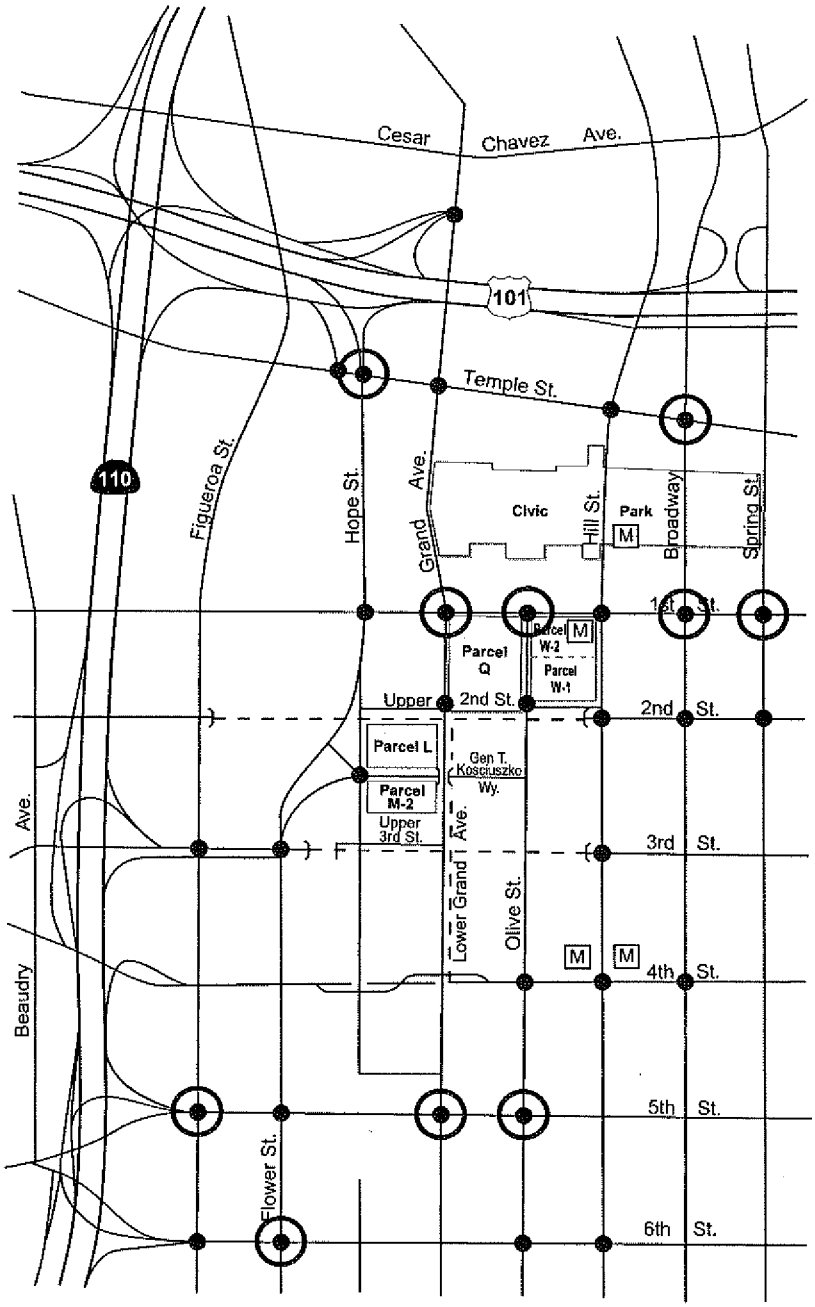
12/11/2013

2006 EIR

Project Component	A.M Peak Hour			P.M Peak Hour			Daily		
	In	Out	Total	In	Out	Total	In	Out	Total
Parcel Q Subtotal	196	220	416	538	446	984	5,327	5,328	10,665
Parcel W-1/W-2 Subtotal	646	226	872	303	683	986	3,198	3,199	6,397
Parcel L/M-2 Subtotal	77	186	263	279	215	494	2,774	2,775	5,549
Total All Parcels	919	632	1,551	1,120	1,344	2,464	11,299	11,302	22,601

2013 Update

Project Component	A.M Peak Hour			P.M Peak Hour			Daily		
	In	Out	Total	In	Out	Total	In	Out	Total
Parcel Q Subtotal	208	194	402	531	450	981	5,500	5,499	10,999
Parcel W-1/W-2 Subtotal	646	226	872	303	683	986	3,198	3,199	6,397
Parcel L/M-2 Subtotal	91	173	263	215	230	444	2,231	2,230	4,461
Total All Parcels	945	593	1,537	1,049	1,363	2,411	10,929	10,928	21,857



Legend

- Project Site
- Analyzed Intersection
- M Red Line Station
- Traffic Data Comparison

07/19/13

N

Not to Scale

Figure 2
Grand Avenue EIR Study Intersections - Parcel Q Update Traffic Count Comparison

A comparison of these existing condition traffic counts is summarized in Table 3. The key conclusions are the following:

- In the AM peak hour the Los Angeles Street Civic Building traffic counts were on average 14% lower than the Grand Avenue EIR traffic counts.

- In PM peak hour the Los Angeles Street Civic Building traffic counts were 2% lower than the Grand Avenue EIR Counts, and the CCM&FF counts were on average 10% lower.

- In all cases except one, the more recent traffic counts were lower than the Grand Avenue EIR counts at every individual intersection. At the only exception, the more recent traffic volumes were only 2% higher than in the Grand Avenue EIR.

It is therefore concluded that the existing condition traffic counts in the Grand Avenue EIR are still valid as recent traffic data indicate the 2006 counts have not been exceeded.

Related Projects

We evaluated the related projects list in the Grand Avenue EIR to the related projects list in the two recent EIRs in Downtown Los Angeles identified above. The CCM&FF related project list was finalized in August 2011 and the Los Angeles Street Civic Building EIR list in September 2012.

The results of the comparison are shown in Table 4, and are summarized as follows.

Number of Projects

The total number of projects in each list was:

- 93 Related Projects in 2006 Grand Avenue EIR

- 133 Related Projects in 2012 CCM&FF EIR

- 96 Related Projects in 2012 Los Angeles Street Civic Building EIR

Table 3 Grand Avenue Project Parcel Q Update - Intersection Existing Traffic Volume Comparison

6/12/2013

Intersection	AM Peak					PM Peak				
	Grand Avenue (2005)	LA Event Center (2011)		LA St. Civic Building Project (2012)		Grand Avenue (2005)	LA Event Center (2011)		LA St. Civic Building Project (2012)	
	Volume	Volume	% Diff.	Volume	% Diff.	Volume	Volume	% Diff.	Volume	% Diff.
Hope St. / Temple St. (US-101 Ramps)		-	-	-	-	3,284	2,985	-9.1%	-	-
Broadway / Temple St.	3,040	-	-	2,706	-11.0%	3,584	-	-	3,548	-1.0%
Grand Ave. / 1st St.		-	-	-	-	4,107	4,025	-2.0%	-	-
Olive St. / 1st St.		-	-	-	-	3,619	3,049	-15.8%	-	-
Broadway / 1st St.	3,375	-	-	2,858	-15.3%	4,047	-	-	3,969	-1.9%
Spring St. / 1st St.	3,323	-	-	2,845	-14.4%	2,905	2,153	-25.9%	2,798	-3.7%
Figueroa St. / 5th St.		-	-	-	-	5,509	5,182	-5.9%	-	-
Grand Ave. / 5th St.		-	-	-	-	2,997	2,695	-10.1%	-	-
Olive St. / 5th St.		-	-	-	-	3,396	3,031	-10.7%	-	-
Flower St. / 6th St.		-	-	-	-	2,817	2,879	2.2%	-	-
Average %					-13.6%			-9.7%		-2.2%

Note: Volumes show total approach volumes to intersection.

F:\Projects 2013\Grand Avenue Parcel Q Update\Products\[Table 3 Existing Traffic Vol. Comparison - 6-12-13.xlsx]Sheet1

Table 4. Grand Avenue Parcel Q Update - Related Project Comparison

6/19/2013

		Grand Avenue Project (Target year 2015)	CCM&FF Project (Target year 2017)		Los Angeles Street Civic Building Project (Target year 2018)	
# of Related Projects		93	133		96	
Trip Generation of Related Projects - Per EIRs	AM Peak	21,328	N/A		16,520 [1]	-23%
	PM Peak	28,192	31,467	12%	33,288 [1]	18%
Trip Generation of Related Projects - Excluding CCM&FF	AM Peak	21,328	N/A		16,520 [2]	-23%
	PM Peak	28,192	31,467	12%	23,286 [2]	-17%
# of Related Projects in Other Studies but Not in Grand Ave	PM TG > 1,000 trips		0		2	
	PM TG > 500 trips < 1,000 trips		5		5	
	PM TG > 150 trips < 500 trips		15		17	

1. Includes CCM&FF Project
2. Excludes CCM&FF Project

The higher number of related projects in the CCM&FF EIR was due to the larger study area being identified for this regional entertainment facility than for the Grand Avenue Project. The similar number of related projects in the Los Angeles Street Civic Building EIR reflects a geographic study area more similar to the Grand Avenue Project.

Peak Hour Trips

The number of total trips in each related projects list is also shown in Table 4. The CCM&FF Project had slightly more trips (12%) than the Grand Avenue EIR in the PM Peak hour (again due to the larger study area). The Los Angeles Street Civic Building EIR had 23% fewer trips than the Grand Avenue EIR in the AM Peak hour, but 18% more trips in the PM peak hour. However, this PM peak hour number is the result of the CCM&FF Project being included in the list. We do not believe this to be an appropriate approach. As identified in the CCM&FF EIR, the Farmers Field events would occur predominantly on weekends with weekday events occurring only a handful (less than 10) days a year. Therefore, it cannot be considered part of the normal or typical background condition. When the CCM&FF Project is excluded, the Los Angeles Street Civic Building EIR related project trips are 17% less than in the Grand Avenue EIR. Even if the trips for the Los Angeles Street Civic Building itself are added to the related projects trips in that EIR, the total combined trips are still 13% less than in the Grand Avenue EIR.

Comparison of Listed Projects

A detailed comparison of the full lists of specific related projects in each EIR is difficult due to the different time frames of each analysis. However, certain conclusion may be drawn. There were certain projects in the Grand Avenue list that did not appear in the more recent lists (either because they have already been completed or because they have dropped off the list of active projects). There are some projects that appear in the CCM&FF and Los Angeles Street Civic Building lists that were not in the Grand Avenue EIR list because those lists are more recent.

Comparison of Future Total Trips

The evaluation performed a comparison of total Future with Project forecast traffic volumes from both the CCM&FF EIR (forecast year 2017) and the Los Angeles Street Civic Building EIR (forecast year 2018) studies and compared them to the Grand Avenue EIR Future With Project volumes (forecast year 2015), for four key intersections along 1st Street. This comparison is summarized in Table 5. The key conclusions are the following:

Table 5 Grand Avenue Project Parcel Q Update - Intersection Future With Project Traffic Volume Comparison - 1st Street Intersections 6/13/2013

Intersection	AM Peak					PM Peak				
	Grand Avenue (Target Yr. 2015)	LA Event Center (Target Year 2017)		LA St. Civic Building Project (Target Year 2018)		Grand Avenue (Target Yr. 2015)	LA Event Center (Target Year 2017)		LA St. Civic Building Project (Target Year 2018)	
	Volume	Volume	% Diff.	Volume	% Diff.	Volume	Volume	% Diff.	Volume	% Diff.
Hope St. / Temple St. (US-101 Ramps)		-	-	-	-	-	-	-	-	-
Broadway / Temple St.		-	-	-	-	-	-	-	-	-
Grand Ave. / 1st St.		-	-	-	-	6,039	6,149	1.8%	-	-
Olive St. / 1st St.		-	-	-	-	5,080	4,442	-12.6%	-	-
Broadway / 1st St.	5,156	-	-	3,685	-28.5%	6,175	-	-	5,117	-17.1%
Spring St. / 1st St.	4,954	-	-	3,469	-30.0%	4,954	4,173	-15.8%	3,964	-20.0%
Figueroa St. / 5th St.		-	-	-	-	-	-	-	-	-
Grand Ave. / 5th St.		-	-	-	-	-	-	-	-	-
Olive St. / 5th St.		-	-	-	-	-	-	-	-	-
Flower St. / 6th St.		-	-	-	-	-	-	-	-	-
Average %					-29.3%			-8.8%		-18.6%

Note: Volumes show total approach volumes to intersection.

F:\Projects 2013\Grand Avenue Parcel Q Update\Products\[Table 5 FWP Traffic Vol. Comparison - 6-13-13.xlsx]Sheet1

- In the AM peak hour the total Future with Project traffic forecasts for the Los Angeles Street Civic Building are on average 29% lower than the Grand Avenue EIR forecasts.

- In PM peak hour the total Future with Project traffic forecasts for the CCM&FF traffic forecasts are on average 9% lower than the Grand Avenue EIR forecasts, and the Los Angeles Street Civic Building traffic counts are 19% lower.

This evaluation demonstrates even though the Grand Avenue EIR did not have some of the related projects that are included in the two more recent studies, the forecasted future total traffic volumes for those two studies (which include those new projects not in the Grand Avenue Study in their future traffic forecasts) are still lower than the projected forecast total traffic volumes in the Grand Avenue EIR. This is also probably due to the fact that some of the some related projects included in the Grand Avenue EIR are not included in the more recent studies, and that the background traffic has decreased slightly since the traffic study done for the Grand Avenue EIR.

It is therefore concluded that the future traffic forecasts from the related projects list in the 2006 EIR are still valid.

Evaluation of Driveway Changes

The Revised Project includes minor changes to certain driveways on Parcel Q as described earlier. These changes were evaluated to determine if the Revised Project driveway configurations could lead to new significant traffic impacts. The analysis followed the same methodology and parameters as in the Original Project EIR Traffic Study. The analysis of the Revised Project accounted for the changes in trip generation on Parcel Q and the differences in local access/egress traffic distribution that would occur with the modified driveways – namely that there would no longer be exiting traffic at the First Street driveway, that the two Second Street driveways would be consolidated, and that there would no longer be a commercial use exit driveway to Lower Grand Avenue.

Driveway Volumes

The analysis first addressed driveway volumes. Figures 3 and 4 show the Parcel Q driveway volumes in the original EIR (Parcel W & Parcel L/M-2 driveways are not changed in the Revised Project, so those volumes are not shown in the figures). Figures 5 and 6 show the Parcel Q driveway volumes for the Revised Project. As can be seen from the figures, while

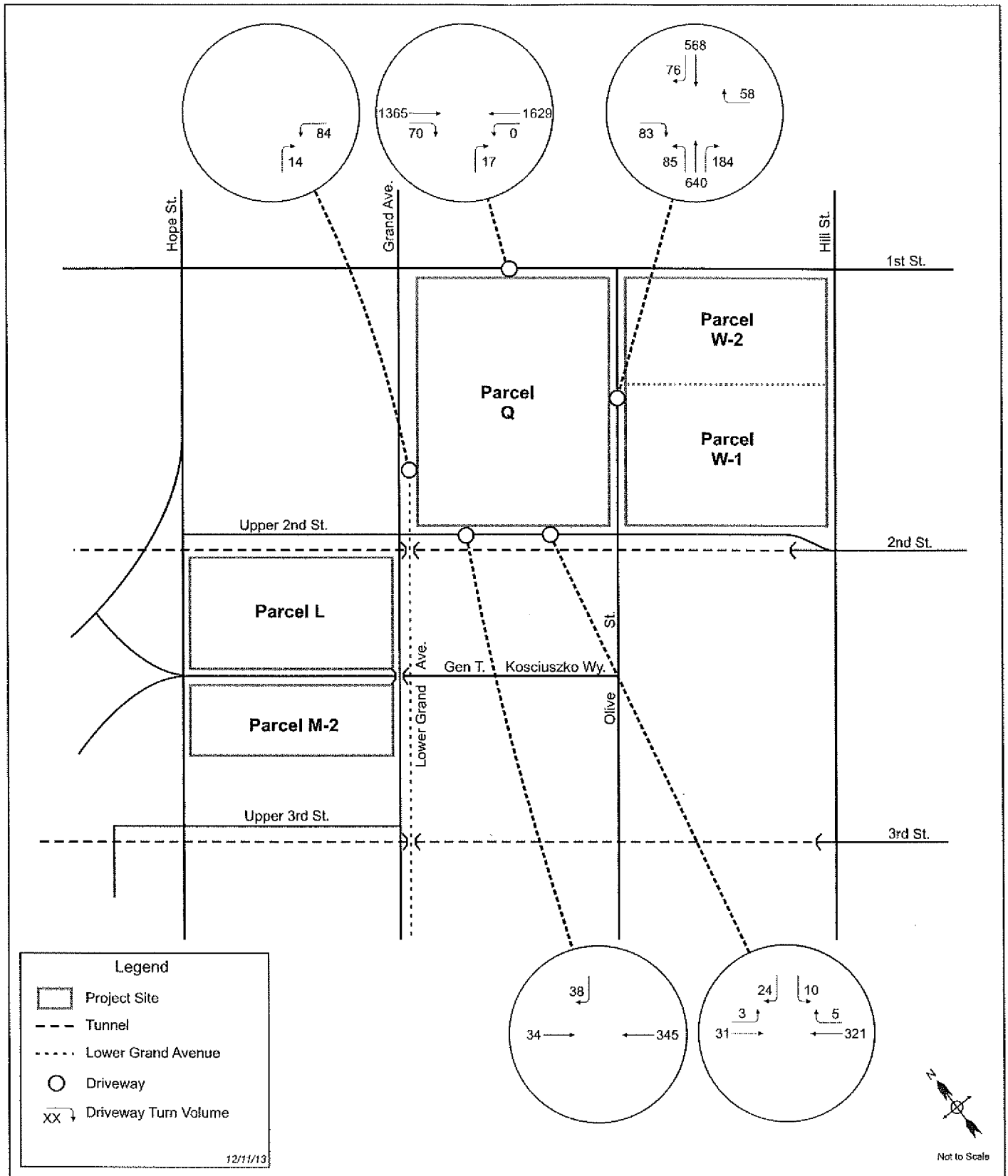


Figure 3 Parcel Q Driveway Volumes (from Fig 5-3 in 2006 original EIR)
Project Driveway Volumes - AM Peak Hour - Project with County Office Building Option

Grand Avenue Project

The **Mobility** Group
Transportation Strategies & Solutions

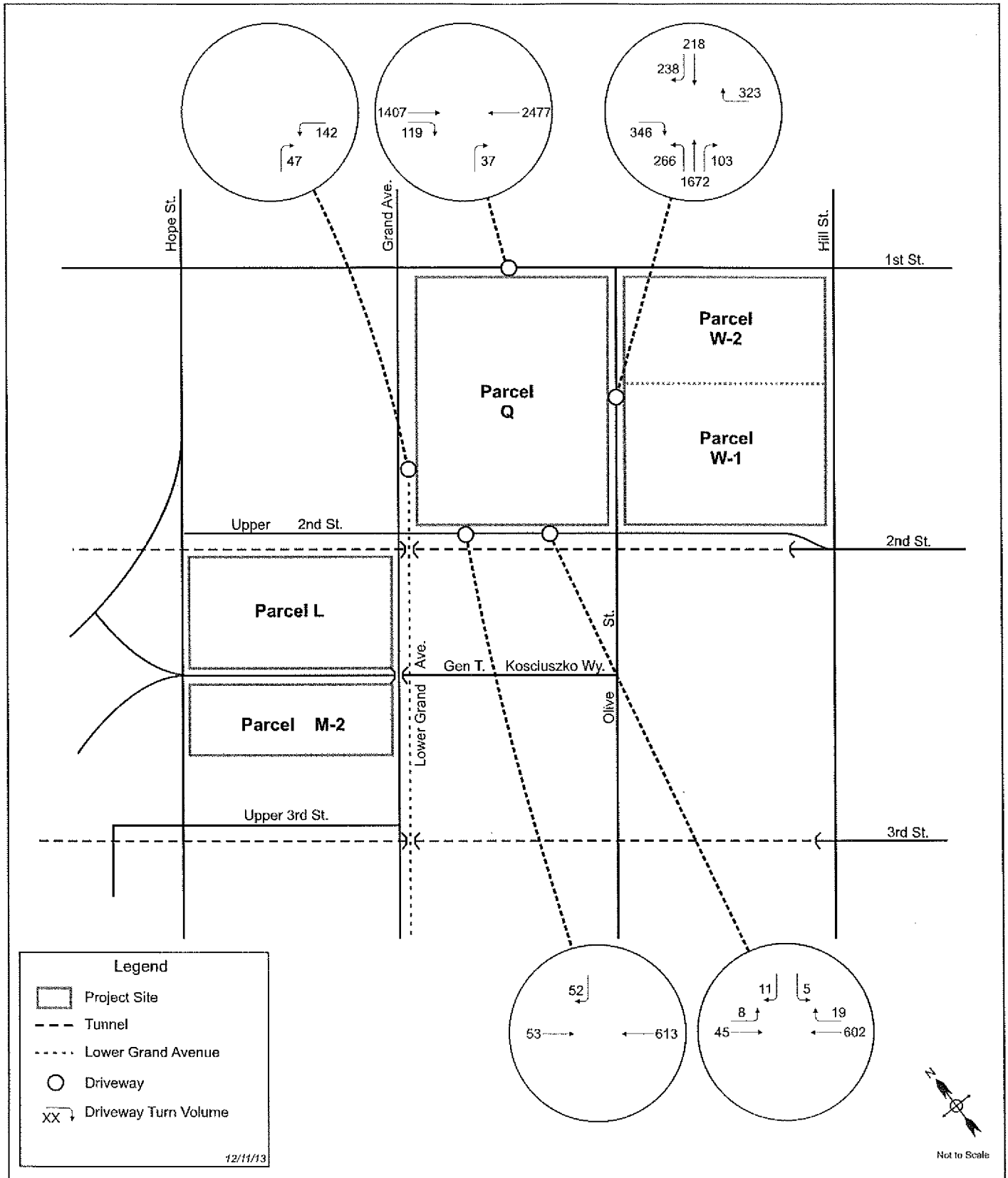


Figure 4 Parcel Q Driveway Volumes (from Fig 5-4 in 2006 Original EIR)
Project Driveway Volumes - PM Peak Hour - Project with County Office Building Option

Grand Avenue Project

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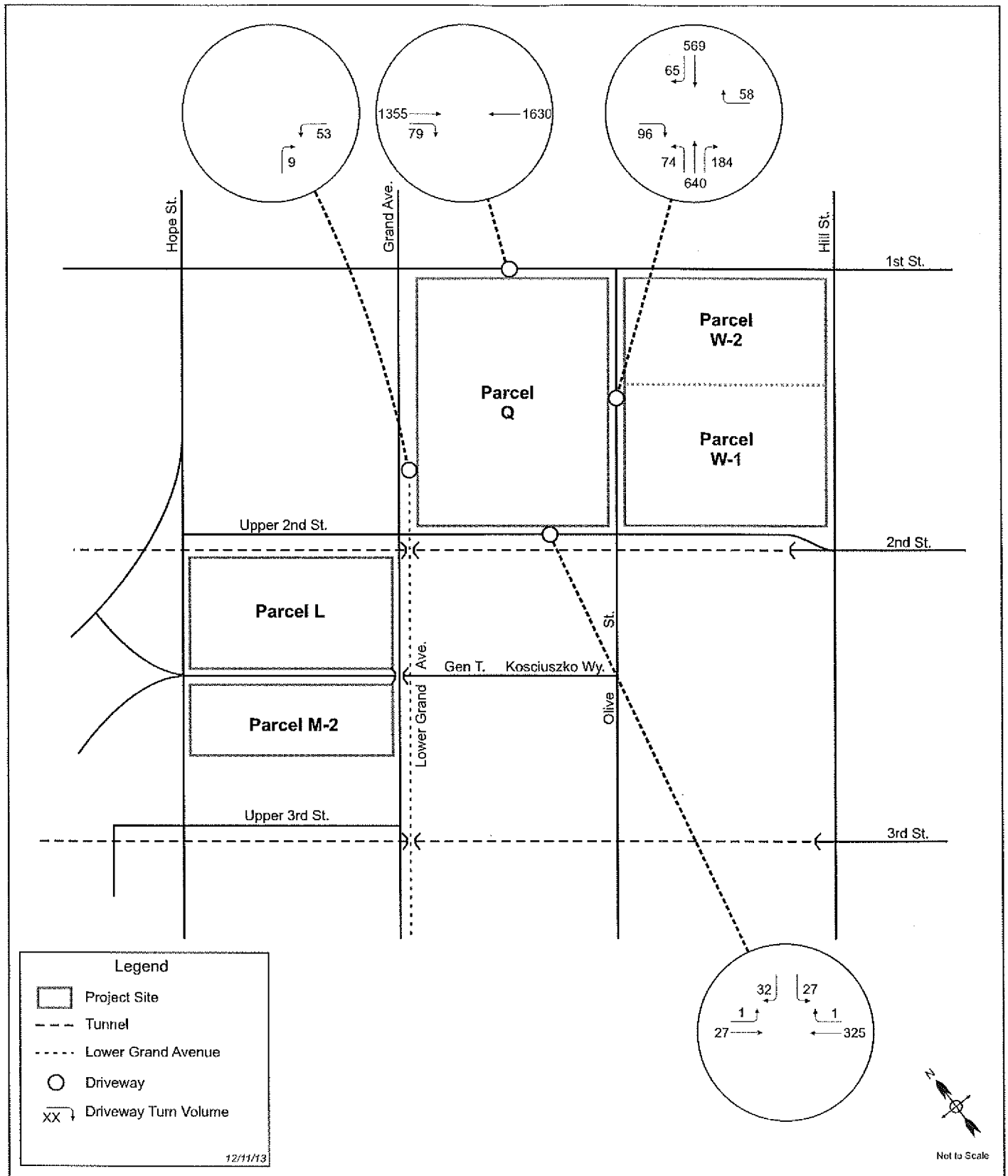

Figure 5 Parcel Q Driveway Volumes - Revised Project 2013
Project Driveway Volumes - AM Peak Hour - Project with County Office Building Option

Grand Avenue Project

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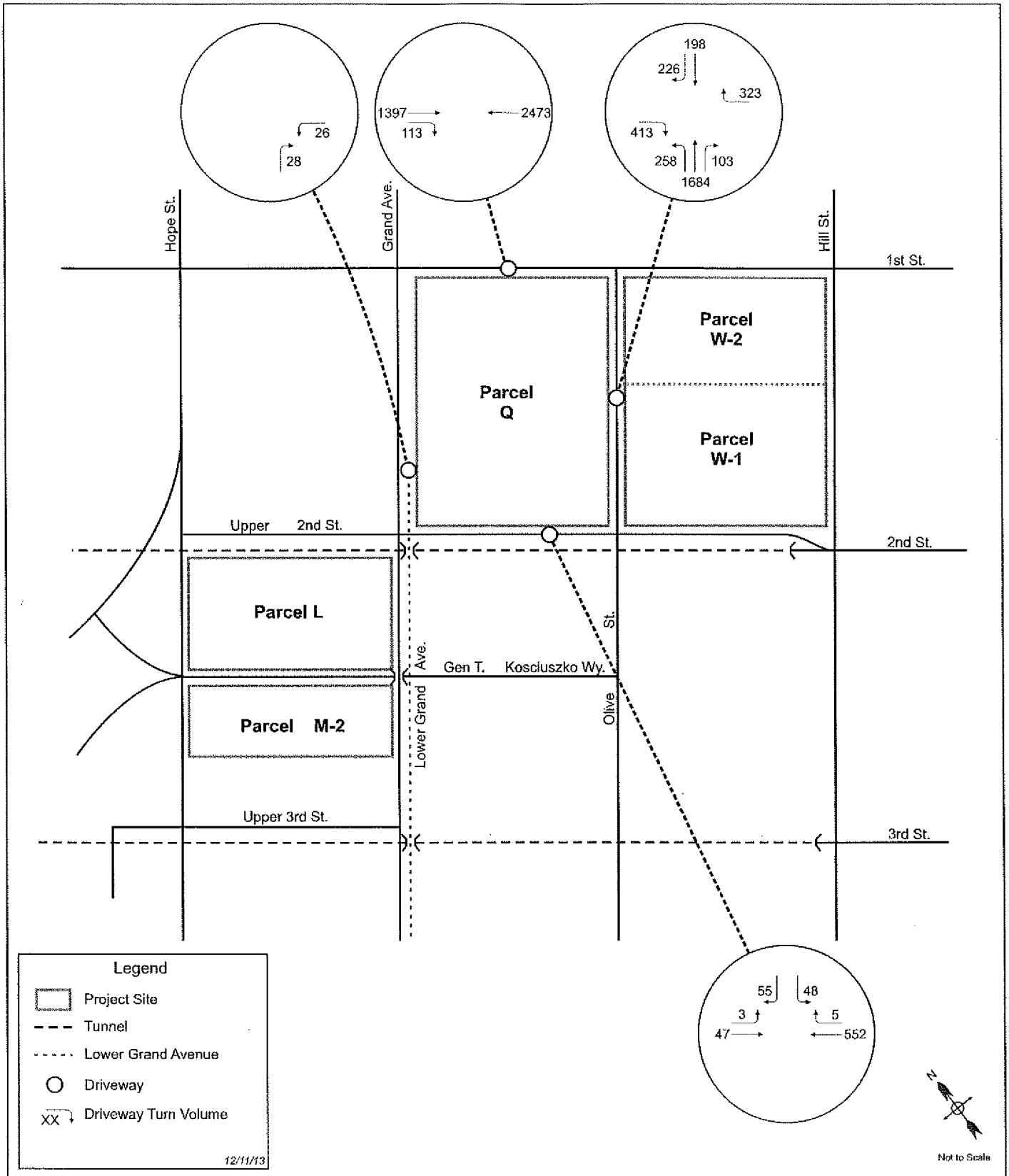

Figure 6 Parcel Q Driveway Volumes - Revised Project 2013
Project Driveway Volumes - PM Peak Hour - Project with County Office Building Option

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some driveway volumes change with the Revised Project, the level of change is small and would not be expected to significantly change the results in the original Project EIR. This was confirmed in the following analysis.

Driveway Levels of Service

The driveway levels of service for Parcel Q for the Original Project are shown in Table 6, and for the Revised Project in Table 7. As can be seen, there is very little difference between the two analyses, with the levels of service remaining very largely the same. There would be no new significant impacts caused by the Revised Project driveway configurations.

Intersection Levels of Service

There may also be the potential for the slightly revised access and egress routes caused by the modified driveway configurations in the Revised Project to cause new significant traffic impacts at nearby intersections.

In order to evaluate this potential, an analysis was conducted of the eight intersections closest to the Project site (all of the intersections that could potentially be affected by revised access/egress patterns). Again this analysis followed the same procedures used in the original EIR Traffic Study. The results of this analysis are shown in Tables 8 and 9.

As can be seen from Tables 8 and 9, there would be no new significant intersection traffic impacts caused by the Revised Project driveway configurations. In fact, there would be one less significant impact in the P.M. peak hour – the impact identified in the Original EIR at Grand Avenue and Upper Second Street would be eliminated with the Revised Project.

Conclusions

The analysis has demonstrated that:

- The Revised Project trip generation totals are within the envelope of total trips analyzed in the 2006 EIR.

- The circumstances analyzed in the 2006 EIR concerning existing traffic counts and related project trips are still valid as the traffic trips associated with those matters have not been exceeded under current conditions.

Table 6 **Parcel Q Driveway Level of Service Analysis - Original Project** 12/11/2012

From Table 5-2 in Original 2006 EIR
Future With Project Conditions - Driveway Level of Service
Project with County Office Building Option

Parcel	Driveway		Future With Project - AM Peak Hour		Future With Project - PM Peak Hour	
			Delay (secs)	LOS	Delay (secs)	LOS
Q	1st Street Driveway	NB Right Turn	12.0	B	12.8	B
		NB Approach	12.0	B	12.8	B
		Worst Case LOS	**12.0**	**B**	**12.8**	**B**
Q	Upper 2nd St. Driveway (Mid block)	EB Left Turn	7.9	A	8.7	A
		SB Approach	9.9	A	11.6	B
		Worst Case LOS	**9.9**	**A**	**11.6**	**B**
Q	Upper 2nd St. Driveway (Closer to Grand Ave.)	SB Right Turn	9.5	A	10.6	B
		SB Approach	9.5	A	10.6	B
		Worst Case LOS	**9.5**	**A**	**10.6**	**B**
Q / W	Olive St. Driveway	NB Left Turn	9.2	A	9.2	A
		EB Right Turn	11.0	B	13.2	B
		WB Right Turn	10.6	B	32.0	D
		EB Approach	11.0	B	13.2	B
		WB Approach	10.6	B	32.0	D
		Worst Case LOS	**11.0**	**B**	**32.0**	**D**

Table 7 **Parcel Q Driveway Level of Service Analysis - Revised Project** 12/11/2012

Future With Project Conditions - Driveway Level of Service
Project with County Office Building Option

Parcel	Driveway		Future With Project - AM Peak Hour		Future With Project - PM Peak Hour	
			Delay (secs)	LOS	Delay (secs)	LOS
Q	1st Street Driveway	NB Right Turn	N/A	N/A	N/A	N/A
		NB Approach	N/A	N/A	N/A	N/A
		Worst Case LOS	**N/A**	**N/A**	**N/A**	**N/A**
Q	Upper 2nd St. Driveway (Mid block)	EB Left Turn	7.9	A	8.5	A
		SB Approach	10.3	B	12.8	B
		Worst Case LOS	**10.3**	**B**	**12.8**	**B**
Q	Upper 2nd St. Driveway (Closer to Grand Ave.)	Driveway Removed	N/A	N/A	N/A	N/A
Q / W	Olive St. Driveway	NB Left Turn	9.1	A	9.1	A
		EB Right Turn	11.1	B	14.2	B
		WB Right Turn	10.6	B	32.5	D
		EB Approach	11.1	B	14.2	B
		WB Approach	10.6	B	32.5	D
		Worst Case LOS	**11.1**	**B**	**32.5**	**D**

Table 8 Intersection Level Of Service - Future With Project Conditions - Project with County Office Building Option - From 2006 EIR 4/21/2006

No.	Intersection	A.M Peak						P.M Peak					
		Future Without Project Condtions		Future With Project Conditions		Change in V/C	Significant Impact	Future Without Project Condtions		Future With Project Conditions		Change in V/C	Significant Impact
		V/C	LOS	V/C	LOS			V/C	LOS	V/C	LOS		
6	Hope St. / 1st St.	0.925	E	0.935	E	0.010	Yes	0.733	C	0.830	D	0.097	Yes
7	Hope St. / GTK Way / 2nd Place	0.420	A	0.452	A	0.032	No	0.776	C	0.845	D	0.069	Yes
13	Grand Ave. / 1st St.	0.791	C	0.818	D	0.027	Yes	0.850	D	0.918	E	0.068	Yes
14	Grand Ave. / Upper 2nd St.	0.537	A	0.670	B	0.133	No	0.504	A	0.708	C	0.204	Yes
16	Olive St. / 1st St.	0.531	A	0.609	B	0.078	No	0.627	B	0.801	D	0.174	Yes
17	Olive St. / 2nd St.	0.283	A	0.359	A	0.076	No	0.406	A	0.583	A	0.177	No
22	Hill St. / 1st St.	0.744	C	0.766	C	0.022	No	0.911	E	0.947	E	0.036	Yes
23	Hill St. / 2nd St.	0.765	C	0.793	C	0.028	No	0.679	B	0.845	D	0.166	Yes

Table 9 Intersection Level Of Service - Future With Project Conditions - Project with County Office Building Option - Revised Project 2013 12/4/2013

No.	Intersection	A.M Peak						P.M Peak					
		Future Without Project Condtions		Future With Project Conditions		Change in V/C	Significant Impact	Future Without Project Condtions		Future With Project Conditions		Change in V/C	Significant Impact
		V/C	LOS	V/C	LOS			V/C	LOS	V/C	LOS		
6	Hope St. / 1st St.	0.925	E	0.936	E	0.011	Yes	0.733	C	0.833	D	0.100	Yes
7	Hope St. / GTK Way / 2nd Place	0.420	A	0.455	A	0.035	No	0.776	C	0.839	D	0.063	Yes
13	Grand Ave. / 1st St.	0.791	C	0.818	D	0.027	Yes	0.850	D	0.916	E	0.066	Yes
14	Grand Ave. / Upper 2nd St.	0.537	A	0.659	B	0.122	No	0.504	A	0.695	B	0.191	No
16	Olive St. / 1st St.	0.531	A	0.603	B	0.072	No	0.627	B	0.795	C	0.168	Yes
17	Olive St. / 2nd St.	0.283	A	0.369	A	0.086	No	0.406	A	0.585	A	0.179	No
22	Hill St. / 1st St.	0.744	C	0.766	C	0.022	No	0.911	E	0.947	E	0.036	Yes
23	Hill St. / 2nd St.	0.765	C	0.793	C	0.028	No	0.679	B	0.837	D	0.158	Yes

- The Revised Site Plan is essentially the same as the Original Site Plan. While the location of the driveways remains basically the same, there are some operational changes to some driveways, as described above. The Revised Site Plan would not cause any new significant traffic impacts, and in fact would eliminate one significant impact identified in the 2006 EIR.

We therefore conclude that the Revised Project would not cause any new significant traffic impacts or a substantial increase in any significant traffic impact previously identified in the 2006 EIR and that no further traffic studies are necessary.

We respectfully request LADOT's concurrence with these conclusions.

Appendix A

2006 EIR

Trip Generation Tables

Table A-0 **Summary of Project Trip Generation - Grand Avenue 2006 EIR** 7/3/2013

A. By Parcel

Project Component	Quantity	Units	A.M Peak Hour			P.M Peak Hour			Daily		
			In	Out	Total	In	Out	Total	In	Out	Total
Parcel Q											
Condominiums	400	D.U	21	89	110	71	44	115	658	658	1,316
Apartments	100	D.U	4	13	17	12	8	20	118	118	236
Subtotal Residential			25	102	127	83	52	135	776	776	1,552
Hotel	275	Rooms	59	38	97	58	52	110	710	710	1,420
Supermarket	53,000	S.F	54	34	88	123	118	241	1,056	1,056	2,112
Retail	97,750	S.F	41	26	67	128	139	267	1,446	1,446	2,892
Restaurant	42,000	S.F	8	8	16	99	49	148	889	889	1,777
Event Facility	250	Seats	0	0	0	11	3	14	169	169	339
Health Club	50,000	S.F	9	12	21	36	33	69	282	282	563
Subtotal Commercial			112	80	192	397	342	739	3,841	3,842	7,683
Subtotal			196	220	416	538	446	984	5,327	5,328	10,665
Parcel W-1 / W-2											
Condominiums	568	D.U	28	119	147	98	60	158	898	899	1,797
Apartments	142	D.U	6	18	24	17	11	28	168	167	335
Subtotal Residential			34	137	171	115	70	186	1,066	1,066	2,132
Office	681,000	S.F	585	72	657	91	519	610	1,074	1,074	2,148
Retail	54,400	S.F	25	15	40	74	81	155	847	847	1,694
Restaurant	10,000	S.F	2	2	4	23	12	35	211	212	423
Subtotal Commercial			612	89	701	188	612	800	2,132	2,133	4,265
Subtotal			646	226	872	303	683	986	3,198	3,199	6,397
Parcel L / M-2											
Condominiums	680	D.U	33	139	172	116	71	187	1,059	1,059	2,118
Apartments	170	D.U	7	22	29	21	13	34	201	201	402
Subtotal Residential			40	161	201	137	84	221	1,260	1,260	2,520
Retail	73,100	S.F	34	22	56	106	114	220	1,197	1,198	2,395
Restaurant	15,000	S.F	3	3	6	36	17	53	317	317	634
Subtotal Commercial			37	25	62	142	131	273	1,514	1,515	3,029
Subtotal			77	186	263	279	215	494	2,774	2,775	5,549
Total All Parcels			919	632	1,551	1,120	1,344	2,464	11,299	11,302	22,601

Table A-0 **Summary of Project Trip Generation - Grand Avenue 2006 EIR** 7/3/2013

B. By Land Use

Land Use Type	Quantity	Units	A.M Peak Hour			P.M Peak Hour			Daily		
			In	Out	Total	In	Out	Total	In	Out	Total
Condominiums	1,648	D.U	82	347	429	285	175	460	2,615	2,616	5,231
Apartments	412	D.U	17	53	70	50	32	82	487	486	973
Subtotal Residential	2,060	D.U	99	400	499	335	207	542	3,102	3,102	6,204
Hotel	275	Rooms	59	38	97	58	52	110	710	710	1,420
Office	681,000	S.F	585	72	657	91	519	610	1,074	1,074	2,148
Supermarket	53,000	S.F	54	34	88	123	118	241	1,056	1,056	2,112
Retail	225,250	S.F	100	63	163	308	334	642	3,490	3,491	6,981
Restaurant	67,000	S.F	13	13	26	158	78	236	1,417	1,418	2,834
Event Facility	250	Seats	0	0	0	11	3	14	169	169	339
Health Club	50,000	S.F	9	12	21	36	33	69	282	282	563
Subtotal Commercial			761	194	955	727	1,085	1,812	7,488	7,490	14,977
Total			919	632	1,551	1,120	1,344	2,464	11,299	11,302	22,601

Table A-1 **A.M Peak Hour Trip Generation - Grand Avenue 2006 EIR** 4/21/2006

Land Use	Quantity	Units	Trip Rates	Foot - note	Base Vehicle Trips	% Project Internal	% Walk-In / Walk-Out	% Transit, R/S, & Taxi	% Pass-By	Net Vehicle Trips	Net as % Base	Inbound		Outbound	
												%	Trips	%	Trips
Parcel Q															
Condominiums	400	D.U	0.36	1,2	145	5%	15%	5%		110	76%	19%	21	81%	89
	534,562	S.F													
Apartments	100	D.U	0.30	1,3	30	5%	20%	25%		17	56%	25%	4	75%	13
	98,375	S.F													
Subtotal Residential	500	D.U			175					127	73%	20%	25	80%	102
	632,937	S.F													
Hotel	275	Rooms	0.52	1,4	143	5%	10%	20%		97	68%	61%	59	39%	38
	315,000	S.F													
Office	0	S.F	0.00	1,5	0							88%		12%	
Market	53,000	S.F	3.89	1,6	206	15%	10%	5%	40%	88	43%	61%	54	39%	34
Retail	97,750	S.F	1.58	1,7	154	15%	20%	5%	30%	67	43%	61%	41	39%	26
Restaurant	42,000	S.F	0.81	1,8,9	34	15%	30%	5%	10%	16	47%	52%	8	48%	8
Event Facility	250	Seats	0.00	1,10	0	5%	5%	5%	10%	0			0		0
	24,000	S.F													
Health Club	50,000	S.F	1.21	1,11	61	20%	35%	5%	20%	21	34%	42%	9	58%	12
Subtotal Commercial	266,750	S.F			455					192	42%	58%	112	42%	80
Total Parcel Q	1,214,687	S.F			773					416	54%	47%	196	53%	220
Parcel W-1 / W-2															
Condominiums	568	D.U	0.34	1,2	193	5%	15%	5%		147	76%	19%	28	81%	119
	553,005	S.F													
Apartments	142	D.U	0.30	1,3	43	5%	20%	25%		24	56%	25%	6	75%	18
	139,728	S.F													
Subtotal Residential	710	D.U			236					171	73%	20%	34	80%	137
	692,733	S.F													
Hotel	0	Rooms	0.00	1,4	0					0		61%	0	39%	0
	0	S.F													
Office	681,000	S.F	1.69	1,5	1,153	0%	5%	40%	0%	657	57%	89%	585	11%	72
Retail	54,400	S.F	2.00	1,7	109	15%	20%	5%	40%	40	37%	61%	25	39%	15
Restaurant	10,000	S.F	0.81	1,8,9	8	15%	30%	5%	10%	4	49%	52%	2	48%	2
Event Facility	0	Seats	0.00	1,10	0					0			0		0
	0	S.F													
Health Club	0	S.F	1.21	1,11	0					0		42%	0	58%	0
Subtotal Commercial	745,400	S.F			1,270					701	55%	87%	612	13%	89
Total Parcel W-1 / W-2	1,438,133	S.F			1,506					872	58%	74%	646	26%	226

Table A-1 **A.M Peak Hour Trip Generation - Grand Avenue 2006 EIR** 4/21/2006

Land Use	Quantity	Units	Trip Rates	Foot - note	Base Vehicle Trips	% Project Internal	% Walk-In / Walk-Out	% Transit, R/S, & Taxi	% Pass-By	Net Vehicle Trips	Net as % Base	Inbound		Outbound	
												%	Trips	%	Trips
Parcel L / M-2															
Condominiums	680	D.U	0.33	1,2	226	5%	15%	5%		172	76%	19%	33	81%	139
	662,050	S.F													
Apartments	170	D.U	0.30	1,3	51	5%	20%	25%		29	56%	25%	7	75%	22
	167,280	S.F													
Subtotal Residential	850	D.U			277					201	73%	20%	40	80%	161
	829,330	S.F													
Hotel	0	Rooms	0.00	1,4	0					0		61%	0	39%	0
	0	S.F													
Office	0	S.F	0.00	1,5	0					0		88%	0	12%	0
Retail	73,100	S.F	1.77	1,7	130	15%	20%	5%	30%	56	43%	61%	34	39%	22
Restaurant	15,000	S.F	0.81	1,8,9	12	15%	30%	5%	10%	6	47%	52%	3	48%	3
Event Facility	0	Seats	0.00	1,10	0					0			0		0
	0	S.F													
Health Club	0	S.F	1.21	1,11	0					0		42%	0	58%	0
Subtotal Commercial	88,100	S.F			142					62	44%	60%	37	40%	25
Total Parcel L / M-2	917,430	S.F			419					263	63%	29%	77	71%	186
Total All Parcels	3,570,250	S.F			2,698					1,551	57%	59%	919	41%	632

1. ITE Rates and Equations from Trip Generation, 7th Edition, Institute of Transportation Engineers, Washington, DC, 2003, except otherwise noted.
2. ITE 232 trip generation equation (T=0.29(X)+28.26) for High-Rise Condominium / Townhouse was used.
3. ITE 222 trip rate for High-Rise Apartments was used.
4. ITE 310 trip generation equation (LN(T) = 1.24*LN(X) - 2.00) for Hotel was used.
5. ITE 715 trip generation equation (T = 1.66*(X) + 22.94) for Single Tenant Office Building was used.
6. ITE 850 trip generation equation (LN(T) = 1.70*LN(X) - 1.42) for Supermarket was used.
7. ITE 820 trip generation equation (LN(T) = 0.60*LN(X) + 2.29) for Shopping Center was used.
8. ITE 931 trip rate for Quality Restaurant was used.
9. Directional distribution for the AM peak hour is not available. Directional distribution of 52 % entering and 48 % existing was assumed based on ITE 932 for High-Turnover Sit Down Restaurant.
10. ITE 444 trip rate for Movie Theater with Matinee was used.
11. ITE 492 trip rate for Health / Fitness Club was used.

Table A-2 **P.M Peak Hour Trip Generation - Grand Avenue 2006 EIR** 4/21/2006

Land Use	Quantity	Units	Trip Rates	Foot - notes	Base Vehicle Trips	% Project Internal	% Walk-In / Walk-Out	% Transit, R/S, & Taxi	% Pass-By	Net Vehicle Trips	Net as % Base	Inbound		Outbound	
												%	Trips	%	Trips
Parcel Q															
Condominiums	400	D.U	0.38	1,2	151	5%	15%	5%		115	76%	62%	71	38%	44
	534,562	S.F													
Apartments	100	D.U	0.35	1,3	35	5%	20%	25%		20	56%	61%	12	39%	8
	98,375	S.F													
Subtotal Residential	500	D.U			186					135	72%	62%	83	39%	52
	632,937	S.F													
Hotel	275	Rooms	0.59	1,4	162	5%	10%	20%		110	68%	53%	58	47%	52
	315,000	S.F													
Office	0	S.F	0.00	1,5	0							17%		83%	
Market	53,000	S.F	10.66	1,6	565	15%	10%	5%	40%	241	43%	51%	123	49%	118
Retail	97,750	S.F	6.31	1,7	617	15%	20%	5%	30%	267	43%	48%	128	52%	139
Restaurant	42,000	S.F	7.49	1,8	315	15%	30%	5%	10%	148	47%	67%	99	33%	49
Event Facility	250	Seats	0.07	1,9	18	5%	5%	5%	10%	14	77%	75%	11	25%	3
	24,000	S.F													
Health Club	50,000	S.F	4.05	1,10	203	20%	35%	5%	20%	69	34%	51%	36	49%	33
Subtotal Commercial	266,750	S.F			1,718					739	43%	54%	397	46%	342
Total Parcel Q	1,214,687	S.F			2,066					984	48%	55%	538	45%	446
Parcel W-1 / W-2															
Condominiums	568	D.U	0.37	1,2	209	5%	15%	5%		158	76%	62%	98	38%	60
	553,005	S.F													
Apartments	142	D.U	0.35	1,3	50	5%	20%	25%		28	56%	61%	17	39%	11
	139,728	S.F													
Subtotal Residential	710	D.U			259					186	72%	62%	115	38%	71
	692,733	S.F													
Hotel	0	Rooms	0.59	1,4	0					0		53%	0	47%	0
	0	S.F													
Office	681,000	S.F	1.57	1,5	1,070	0%	5%	40%	0%	610	57%	15%	91	85%	519
Retail	54,400	S.F	7.70	1,7	419	15%	20%	5%	40%	155	37%	48%	74	52%	81
Restaurant	10,000	S.F	7.49	1,8	75	15%	30%	5%	10%	35	47%	67%	23	33%	12
Event Facility	0	Seats	0.07	1,9	0					0		75%	0	25%	0
	0	S.F													
Health Club	0	S.F	4.05	1,10	0					0		51%	0	49%	0
Subtotal Commercial	745,400	S.F			1,564					800	51%	23%	188	76%	612
Total Parcel W-1 / W-2	1,438,133	S.F			1,823					986	54%	31%	303	69%	683

Table A-2 **P.M Peak Hour Trip Generation - Grand Avenue 2006 EIR** 4/21/2006

Land Use	Quantity	Units	Trip Rates	Foot - notes	Base Vehicle Trips	% Project Internal	% Walk-In / Walk-Out	% Transit, R/S, & Taxi	% Pass-By	Net Vehicle Trips	Net as % Base	Inbound		Outbound	
												%	Trips	%	Trips
Parcel L / M-2															
Condominiums	680 662,050	D.U S.F	0.36	1,2	247	5%	15%	5%		187	76%	62%	116	38%	71
Apartments	170 167,280	D.U S.F	0.35	1,3	60	5%	20%	25%		34	57%	61%	21	39%	13
Subtotal Residential	850 829,330	D.U S.F			307					221	72%	62%	137	38%	84
Hotel	0 0	Rooms S.F	0.59	1,4	0					0		53%	0	47%	0
Office	0	S.F	0.00	1,5	0					0		17%	0	83%	0
Retail	73,100	S.F	6.96	1,7	509	15%	20%	5%	30%	220	43%	48%	106	52%	114
Restaurant	15,000	S.F	7.49	1,8	112	15%	30%	5%	10%	53	47%	67%	36	33%	17
Event Facility	0 0	Seats S.F	0.07	1,9	0					0		75%	0	25%	0
Health Club	0	S.F	4.05	1,10	0					0		51%	0	49%	0
Subtotal Commercial	88,100	S.F			621					273	44%	52%	142	48%	131
Total Parcel L / M-2	917,430	S.F			928					494	53%	56%	279	44%	215
Total All Parcels	3,570,250	S.F			4,817					2,464	51%	45%	1,120	55%	1,344

1. ITE Rates and Equations from Trip Generation, 7th Edition, Institute of Transportation Engineers, Washington, DC, 2003, except otherwise noted.
2. ITE 232 trip generation equation (T=0.34(X)+15.47) for High-Rise Condominium / Townhouse was used.
3. ITE 222 trip rate for High-Rise Apartments was used.
4. ITE 310 trip rate for Hotel was used.
5. ITE 715 trip generation equation (T=1.52(X)+ 34.88) for Single Tenant Office Building was used.
6. ITE 850 trip generation equation (Ln(T) = 0.79*LN(X) + 3.20) for Supermarket was used.
7. ITE 820 trip generation equation (LN(T) = 0.66*LN(X) + 3.40) for Shopping Center was used.
8. ITE 931 trip rate for Quality Restaurant was used.
9. ITE 444 trip rate for Movie Theater with Matinee was used.
10. ITE 492 trip rate for Health / Fitness Club was used.

Table A-3 **Daily Trip Generation - Grand Avenue 2006 EIR** 4/24/2006

Land Use	Quantity	Units	Trip Rates	Foot - note	Base Vehicle Trips	% Project Internal	% Walk-In / Walk-Out	% Transit, R/S, & Taxi	% Pass-By	Net Vehicle Trips	Net as % Base	Inbound		Outbound	
												%	Trips	%	Trips
Parcel Q															
Condominiums	400	D.U	4.33	1,2	1,732	5%	15%	5%		1,316	76%	50%	658	50%	658
	534,562	S.F													
Apartments	100	D.U	4.20	1,3	420	5%	20%	25%		236	56%	50%	118	50%	118
	98,375	S.F													
Subtotal Residential	500	D.U			2,152					1,552	72%	50%	776	50%	776
	632,937	S.F													
Hotel	275	Rooms	7.59	1,4	2,088	5%	10%	20%		1,420	68%	50%	710	50%	710
	315,000	S.F													
Office	0	S.F	0.00	1,5	0							50%		50%	
Market	53,000	S.F	93.21	1,6	4,940	15%	10%	5%	40%	2,112	43%	50%	1,056	50%	1,056
Retail	97,750	S.F	68.45	1,7	6,691	15%	20%	5%	30%	2,892	43%	50%	1,446	50%	1,446
Restaurant	42,000	S.F	89.95	1,8	3,778	15%	30%	5%	10%	1,777	47%	50%	889	50%	889
Event Facility	250	Seats	1.76	1,9	440	5%	5%	5%	10%	339	77%	50%	169	50%	169
	24,000	S.F													
Health Club	50,000	S.F	32.93	1,10	1,647	20%	35%	5%	20%	563	34%	50%	282	50%	282
Subtotal Commercial	266,750	S.F			17,496					7,683	44%	50%	3,841	50%	3,842
Total Parcel Q	1,214,687	S.F			21,736					10,655	49%	50%	5,327	50%	5,328
Parcel W-1 / W-2															
Condominiums	568	D.U	4.16	1,2	2,365	5%	15%	5%		1,797	76%	50%	898	50%	899
	553,005	S.F													
Apartments	142	D.U	4.20	1,3	596	5%	20%	25%		335	56%	50%	168	50%	167
	139,728	S.F													
Subtotal Residential	710	D.U			2,961					2,132	72%	50%	1,066	50%	1,066
	692,733	S.F													
Hotel	0	Rooms	0.00	1,4	0					0		50%	0	50%	0
	0	S.F													
Office	681,000	S.F	5.53	1,5	3,767	0%	5%	40%	0%	2,148	57%	50%	1,074	50%	1,074
Retail	54,400	S.F	84.04	1,7	4,572	15%	20%	5%	40%	1,694	37%	50%	847	50%	847
Restaurant	10,000	S.F	89.95	1,8	900	15%	30%	5%	10%	423	47%	50%	211	50%	212
Event Facility	0	Seats	1.76	1,9	0					0		50%	0	50%	0
	0	S.F													
Health Club	0	S.F	32.93	1,10	0					0		50%	0	50%	0
Subtotal Commercial	745,400	S.F			9,239					4,265	46%	50%	2,132	50%	2,133
Total Parcel W-1 / W-2	1,438,133	S.F			12,200					6,397	52%	50%	3,198	50%	3,199

Table A-3 **Daily Trip Generation - Grand Avenue 2006 EIR** 4/24/2006

Land Use	Quantity	Units	Trip Rates	Foot - note	Base Vehicle Trips	% Project Internal	% Walk-In / Walk-Out	% Transit, R/S, & Taxi	% Pass-By	Net Vehicle Trips	Net as % Base	Inbound		Outbound	
												%	Trips	%	Trips
Parcel L / M-2															
Condominiums	680	D.U	4.10	1,2	2,787	5%	15%	5%		2,118	76%	50%	1,059	50%	1,059
	662,050	S.F													
Apartments	170	D.U	4.20	1,3	714	5%	20%	25%		402	56%	50%	201	50%	201
	167,280	S.F													
Subtotal Residential	850	D.U			3,501					2,520	72%	50%	1,260	50%	1,260
	829,330	S.F													
Hotel	0	Rooms	0.00	1,4	0					0		50%	0	50%	0
	0	S.F													
Office	0	S.F	0.00	1,5	0					0		50%	0	50%	0
Retail	73,100	S.F	75.78	1,7	5,540	15%	20%	5%	30%	2,395	43%	50%	1,197	50%	1,198
Restaurant	15,000	S.F	89.95	1,8	1,349	15%	30%	5%	10%	634	47%	50%	317	50%	317
Event Facility	0	Seats	1.76	1,9	0					0			0		0
	0	S.F													
Health Club	0	S.F	32.93	1,10	0					0		50%	0	50%	0
Subtotal Commercial	88,100	S.F			6,889					3,029	44%	50%	1,514	50%	1,515
Total Parcel L / M-2	917,430	S.F			10,390					5,549	53%	50%	2,774	50%	2,775
Total All Parcels	3,570,250	S.F			44,326					22,601	51%	50%	11,299	50%	11,302

1. ITE Rates and Equations from Trip Generation, 7th Edition, Institute of Transportation Engineers, Washington, DC, 2003, except otherwise noted.
2. ITE 232 daily trip generation equation (T= 3.77(X)+223.66) for High-Rise Condominium / Townhouse was used.
3. ITE 222 daily trip rate for High-Rise Apartments was used.
4. ITE 310 daily trip generation equation (T = 8.95*(X) - 373.16) for Hotel was used.
5. ITE 715 trip generation equation (LN(T) = 0.60*LN(X) + 4.32) for Single Tenant Office Building was used.
6. ITE 850 daily trip generation equation (T = 66.95*(X) +1391.56) for Supermarket was used.
7. ITE 820 daily trip generation equation (LN(T) = 0.65*LN(X) + 5.83) for Shopping Center was used.
8. ITE 931 daily trip rate for Quality Restaurant was used.
9. ITE 444 daily trip rate for Movie Theater with Matinee is not available. Daily trip rate was estimated based on the ratio of ITE 443 weekday p.m peak hour of adjacent traffic to ITE 444 weekday p.m peak hour of adjacent traffic.
10. ITE 492 daily trip rate for Health / Fitness Club was used.

Appendix B

Revised Program 2013

Trip Generation Tables

Table B-0 **Summary of Project Trip Generation - Grand Avenue Revised Project 2013** 11/18/2013

A. By Parcel

Project Component	Quantity	Units	A.M Peak Hour			P.M Peak Hour			Daily		
			In	Out	Total	In	Out	Total	In	Out	Total
Parcel Q											
Condominiums	360	D.U	19	82	101	65	40	105	600	601	1,201
Apartments	90	D.U	4	11	15	11	7	18	107	106	213
Subtotal Residential	450	D.U	23	93	116	76	47	123	707	707	1,414
Hotel	300	Rooms	66	43	109	64	56	120	786	786	1,572
Office	50,000	S.F	54	7	61	13	64	77	223	223	446
Supermarket	10,000	S.F	3	2	5	33	31	64	441	440	881
Retail	85,000	S.F	38	24	62	117	126	243	1,320	1,321	2,641
Restaurant	85,000	S.F	17	15	32	200	99	299	1,798	1,797	3,595
Event Facility	0	Seats	0	0	0	0	0	0	0	0	0
Health Club	40,000	S.F	7	10	17	28	27	55	225	225	450
Subtotal Commercial	270,000		119	58	177	391	347	738	4,007	4,006	8,013
Subtotal			208	194	402	531	450	981	5,500	5,499	10,999
Parcel W-1 / W-2											
Condominiums	568	D.U	28	119	147	98	60	158	898	899	1,797
Apartments	142	D.U	6	18	24	17	11	28	168	167	335
Subtotal Residential			34	137	171	115	70	186	1,066	1,066	2,132
Office	681,000	S.F	585	72	657	91	519	610	1,074	1,074	2,148
Retail	54,400	S.F	25	15	40	74	81	155	847	847	1,694
Restaurant	10,000	S.F	2	2	4	23	12	35	211	212	423
Subtotal Commercial			612	89	701	188	612	800	2,132	2,133	4,265
Subtotal			646	226	872	303	683	986	3,198	3,199	6,397
Parcel L / M-2											
Condominiums	645	D.U	32	133	164	110	68	178	1,009	1,009	2,018
Apartments	271	D.U	11	34	46	33	21	54	320	320	640
Subtotal Residential			51	201	253	143	89	232	1,329	1,329	2,658
Retail	0	S.F	0	0	0	0	0	0	0	0	0
Restaurant	15,000	S.F	3	3	6	36	17	53	317	317	634
Museum	115,231	S.F	45	2	47	35	124	159	585	584	1,169
Subtotal Commercial			48	5	53	71	141	212	902	901	1,803
Subtotal			91	173	263	215	230	444	2,231	2,230	4,461
Total All Parcels			945	593	1,537	1,049	1,363	2,411	10,929	10,928	21,857

Table B-0 **Summary of Project Trip Generation - Grand Avenue Revised Project 2013** 11/18/2013

B. By Land Use

Land Use Type	Quantity	Units	A.M Peak Hour			P.M Peak Hour			Daily		
			In	Out	Total	In	Out	Total	In	Out	Total
Condominiums	1,573	D.U	79	334	412	273	168	441	2,507	2,509	5,016
Apartments	503	D.U	21	63	85	61	39	100	595	593	1,188
Subtotal Residential	2,076	D.U	100	397	497	334	207	541	3,102	3,102	6,204
Hotel	300	Rooms	66	43	109	64	56	120	786	786	1,572
Office	681,000	S.F	585	72	657	91	519	610	1,074	1,074	2,148
Supermarket	10,000	S.F	3	2	5	33	31	64	441	440	881
Retail	139,400	S.F	63	39	102	191	207	398	2,167	2,168	4,335
Restaurant	110,000	S.F	22	20	42	259	128	387	2,326	2,326	4,652
Event Facility	0	Seats	0	0	0	0	0	0	0	0	0
Health Club	40,000	S.F	7	10	17	28	27	55	225	225	450
Museum	115,231	S.F	45	2	47	35	124	159	585	584	1,169
Subtotal Commercial			725	145	870	637	1,036	1,673	6,818	6,817	13,635
Total			945	593	1,537	1,049	1,363	2,411	10,929	10,928	21,857

Table B-1 **A.M Peak Hour Trip Generation - Grand Avenue Revised Project 2013** 11/18/2013

Land Use	Quantity	Units	Trip Rates	Foot - note	Base Vehicle Trips	% Project Internal	% Walk-In / Walk-Out	% Transit, R/S, & Taxi	% Pass-By	Net Vehicle Trips	Net as % Base	Inbound		Outbound	
												%	Trips	%	Trips
Parcel Q															
Condominiums	360	D.U	0.37	1,2	133	5%	15%	5%		101	76%	19%	19	81%	82
		S.F													
Apartments	90	D.U	0.30	1,3	27	5%	20%	25%		15	56%	25%	4	75%	11
		S.F													
Subtotal Residential	450	D.U			160					116	73%	20%	23	80%	93
	0	S.F													
Hotel	300	Rooms	0.53	1,4	160	5%	10%	20%		109	68%	61%	66	39%	43
		S.F													
Office	50,000	S.F	2.15	1,12	108	0%	5%	40%	0%	61	57%	88%	54	12%	7
Market	10,000	S.F	1.21	1,6	12	15%	10%	5%	40%	5	41%	61%	3	39%	1
Retail	85,000	S.F	1.67	1,7	142	15%	20%	5%	30%	61	43%	61%	37	39%	24
Restaurant	85,000	S.F	0.81	1,8,9	69	15%	30%	5%	10%	32	46%	52%	17	48%	15
Event Facility	0	Seats	0.00	1,10	0	5%	5%	5%	10%	0			0		0
	0	S.F													
Health Club	40,000	S.F	1.21	1,11	48	20%	35%	5%	20%	17	35%	42%	7	58%	10
Subtotal Commercial	270,000	S.F			379					176	46%	67%	118	33%	57
Total Parcel Q	270,000	S.F			698					401	57%	52%	207	48%	193
Parcel W-1 / W-2															
Condominiums	568	D.U	0.34	1,2	193	5%	15%	5%		147	76%	19%	28	81%	119
	553,005	S.F													
Apartments	142	D.U	0.30	1,3	43	5%	20%	25%		24	56%	25%	6	75%	18
	139,728	S.F													
Subtotal Residential	710	D.U			236					171	73%	20%	34	80%	137
	692,733	S.F													
Hotel	0	Rooms	0.00	1,4	0					0		61%	0	39%	0
	0	S.F													
Office	681,000	S.F	1.69	1,5	1,153	0%	5%	40%	0%	657	57%	89%	585	11%	72
Retail	54,400	S.F	2.00	1,7	109	15%	20%	5%	40%	40	37%	61%	25	39%	15
Restaurant	10,000	S.F	0.81	1,8,9	8	15%	30%	5%	10%	4	49%	52%	2	48%	2
Event Facility	0	Seats	0.00	1,10	0					0			0		0
	0	S.F													
Health Club	0	S.F	1.21	1,11	0					0		42%	0	58%	0
Subtotal Commercial	745,400	S.F			1,270					701	55%	87%	612	13%	89
Total Parcel W-1 / W-2	1,438,133	S.F			1,506					872	58%	74%	646	26%	226

Table B-1 **A.M Peak Hour Trip Generation - Grand Avenue Revised Project 2013** 11/18/2013

Land Use	Quantity	Units	Trip Rates	Foot - note	Base Vehicle Trips	% Project Internal	% Walk-In / Walk-Out	% Transit, R/S, & Taxi	% Pass-By	Net Vehicle Trips	Net as % Base	Inbound		Outbound	
												%	Trips	%	Trips
Parcel L / M-2															
Condominiums	645	D.U	0.33	1,2	216	5%	15%	5%		164	76%	19%	32	81%	133
	643,611	S.F													
Apartments	271	D.U	0.30	1,3	81	5%	20%	25%		46	56%	25%	11	75%	34
	271,312	S.F													
Subtotal Residential	916	D.U			297					210	71%	21%	43	80%	167
	914,923	S.F													
Hotel	0	Rooms	0.00	1,4	0					0		61%	0	39%	0
	0	S.F													
Office	0	S.F	0.00	1,5	0					0		88%	0	12%	0
Retail	0	S.F		1,7	0	15%	20%	5%	30%	0		61%	0	39%	0
Restaurant	15,000	S.F	0.81	1,8,9	12	15%	30%	5%	10%	6	47%	52%	3	48%	3
Museum	115,231	S.F	0.41	1,11	47	0%	0%	0%	0%	47	100%	95%	45	5%	2
Health Club	0	S.F	1.21	1,10	0					0		42%	0	58%	0
Subtotal Commercial	130,231	S.F			59					53	89%	91%	48	10%	5
Total Parcel L / M-2	1,045,154	S.F			357					263	74%	35%	91	66%	173
Total All Parcels	2,753,287	S.F			2,561					1,536	60%	61%	944	39%	593

1. ITE Rates and Equations from Trip Generation, 7th Edition, Institute of Transportation Engineers, Washington, DC, 2003, except otherwise noted.
2. ITE 232 trip generation equation (T=0.29(X)+28.26) for High-Rise Condominium / Townhouse was used.
3. ITE 222 trip rate for High-Rise Apartments was used.
4. ITE 310 trip generation equation (LN(T) = 1.24*LN(X) - 2.00) for Hotel was used.
5. ITE 715 trip generation equation (T = 1.66*(X) + 22.94) for Single Tenant Office Building was used.
6. ITE 850 trip generation equation (LN(T) = 1.70*LN(X) - 1.42) for Supermarket was used.
7. ITE 820 trip generation equation (LN(T) = 0.60*LN(X) + 2.29) for Shopping Center was used.
8. ITE 931 trip rate for Quality Restaurant was used.
9. Directional distribution for the AM peak hour is not available. Directional distribution of 52 % entering and 48 % existing was assumed based on ITE 932 for High-Turnover Sit Down Restaurant.
10. ITE 492 trip rate for Health/Fitness Club was used.
11. Trip rate from LACMA Enhancement Study, adjusted for local details of Revised Project.
12. ITE 710 trip generation equation (LN(T) = 0.80*Ln(X) + 1.55) for General Office Building was used.

Table B-2 **P.M Peak Hour Trip Generation - Grand Avenue Revised Project 2013** 11/18/2013

Land Use	Quantity	Units	Trip Rates	Foot - notes	Base Vehicle Trips	% Project Internal	% Walk-In / Walk-Out	% Transit, R/S, & Taxi	% Pass-By	Net Vehicle Trips	Net as % Base	Inbound		Outbound	
												%	Trips	%	Trips
Parcel Q															
Condominiums	360	D.U	0.38	1,2	138	5%	15%	5%		105	76%	62%	65	38%	40
		S.F													
Apartments	90	D.U	0.35	1,3	32	5%	20%	25%		18	56%	61%	11	39%	7
		S.F													
Subtotal Residential	450	D.U			169					123	73%	62%	76	38%	47
	0	S.F													
Hotel	300	Rooms	0.59	1,4	177	5%	10%	20%		120	68%	53%	64	47%	56
		S.F													
Office	50,000	S.F	2.70	1,12	135	0%	5%	40%	0%	77	57%	17%	13	83%	64
Supermarket	10,000	S.F	15.13	1,6	151	15%	10%	5%	40%	64	42%	51%	33	49%	31
Retail	85,000	S.F	6.62	1,7	562	15%	20%	5%	30%	243	43%	48%	117	52%	126
Restaurant	85,000	S.F	7.49	1,8	637	15%	30%	5%	10%	299	47%	67%	200	33%	99
Event Facility	0	Seats	0.07	1,9	0	5%	5%	5%	10%	0	0%	75%	0	25%	0
	0	S.F													
Health Club	40,000	S.F	4.05	1,10	162	20%	35%	5%	20%	55	0%	51%	28	49%	27
Subtotal Commercial	270,000	S.F			1,648					738	45%	53%	391	47%	347
Total Parcel Q	270,000	S.F			1,994					981	49%	54%	531	46%	450
Parcel W-1 / W-2															
Condominiums	568	D.U	0.37	1,2	209	5%	15%	5%		158	76%	62%	98	38%	60
	553,005	S.F													
Apartments	142	D.U	0.35	1,3	50	5%	20%	25%		28	56%	61%	17	39%	11
	139,728	S.F													
Subtotal Residential	710	D.U			259					186	72%	62%	115	38%	71
	692,733	S.F													
Hotel	0	Rooms	0.59	1,4	0					0		53%	0	47%	0
	0	S.F													
Office	681,000	S.F	1.57	1,5	1,070	0%	5%	40%	0%	610	57%	15%	91	85%	519
Retail	54,400	S.F	7.70	1,7	419	15%	20%	5%	40%	155	37%	48%	74	52%	81
Restaurant	10,000	S.F	7.49	1,8	75	15%	30%	5%	10%	35	47%	67%	23	33%	12
Event Facility	0	Seats	0.07	1,9	0					0		75%	0	25%	0
	0	S.F													
Health Club	0	S.F	4.05	1,10	0					0		51%	0	49%	0
Subtotal Commercial	745,400	S.F			1,564					800	51%	23%	188	76%	612
Total Parcel W-1 / W-2	1,438,133	S.F			1,823					986	54%	31%	303	69%	683

Table B-2 **P.M Peak Hour Trip Generation - Grand Avenue Revised Project 2013** 11/18/2013

Land Use	Quantity	Units	Trip Rates	Foot - notes	Base Vehicle Trips	% Project Internal	% Walk-In / Walk-Out	% Transit, R/S, & Taxi	% Pass-By	Net Vehicle Trips	Net as % Base	Inbound		Outbound	
												%	Trips	%	Trips
Parcel L / M-2															
Condominiums	645 643,611	D.U S.F	0.36	1,2	235	5%	15%	5%		178	76%	62%	110	38%	68
Apartments	271 271,312	D.U S.F	0.35	1,3	95	5%	20%	25%		54	57%	61%	33	39%	21
Subtotal Residential	916 914,923	D.U S.F			330					232	70%	62%	143	38%	89
Hotel	0 0	Rooms S.F	0.59	1,4	0					0		53%	0	47%	0
Office	0	S.F	0.00	1,5	0					0		17%	0	83%	0
Retail	0	S.F	0.00	1,7	0	15%	20%	5%	30%	0		48%	0	52%	0
Restaurant	15,000	S.F	7.49	1,8	112	15%	30%	5%	10%	53	47%	67%	36	33%	17
Museum	115,231	S.F	1.38	1,11	159	0%	0%	0%	0%	159	100%	22%	35	78%	124
Health Club	0	S.F	4.05	1,10	0					0		51%	0	49%	0
Subtotal Commercial	130,231	S.F			271					212	78%	34%	71	67%	141
Total Parcel L / M-2	1,045,154	S.F			601					444	74%	48%	215	52%	230
Total All Parcels	2,753,287	S.F			4,418					2,412	55%	43%	1,049	57%	1,369

1. ITE Rates and Equations from Trip Generation, 7th Edition, Institute of Transportation Engineers, Washington, DC, 2003, except otherwise noted.
2. ITE 232 trip generation equation (T=0.34(X)+15.47) for High-Rise Condominium / Townhouse was used.
3. ITE 222 trip rate for High-Rise Apartments was used.
4. ITE 310 trip rate for Hotel was used.
5. ITE 715 trip generation equation (T=1.52(X)+ 34.88) for Single Tenant Office Building was used.
6. ITE 850 trip generation equation (Ln(T) = 0.79*LN(X) + 3.20) for Supermarket was used.
7. ITE 820 trip generation equation (LN(T) = 0.66*LN(X) + 3.40) for Shopping Center was used.
8. ITE 931 trip rate for Quality Restaurant was used.
9. ITE 444 trip rate for Movie Theater with Matinee was used.
10. ITE 492 trip rate for Health / Fitness Club was used.
11. Trip rate from LACMA Enhancement Study.
12. ITE 710 trip generation equation (T=1.12(X)+ 78.84) for General Office Building was used.

Table B-3 **Daily Trip Generation - Grand Avenue Revised Project 2013** 11/18/2013

Land Use	Quantity	Units	Trip Rates	Foot - note	Base Vehicle Trips	% Project Internal	% Walk-In / Walk-Out	% Transit, R/S, & Taxi	% Pass-By	Net Vehicle Trips	Net as % Base	Inbound		Outbound	
												%	Trips	%	Trips
Parcel Q															
Condominiums	360	D.U	4.39	1,2	1,581	5%	15%	5%		1,201	76%	50%	600	50%	601
		S.F													
Apartments	90	D.U	4.20	1,3	378	5%	20%	25%		213	56%	50%	107	50%	106
		S.F													
Subtotal Residential	450	D.U			1,959					1,414	72%	50%	707	50%	707
	0	S.F													
Hotel	300	Rooms	7.71	1,4	2,312	5%	10%	20%		1,572	68%	50%	786	50%	786
		S.F													
Office	50,000	S.F	15.65	1,12	782	0%	5%	40%	0%	446	57%	50%	223	50%	223
Market	10,000	S.F	206.11	1,6	2,061	15%	10%	5%	40%	881	43%	50%	441	50%	440
Retail	85,000	S.F	71.89	1,7	6,110	15%	20%	5%	30%	2,641	43%	50%	1,320	50%	1,321
Restaurant	85,000	S.F	89.95	1,8	7,646	15%	30%	5%	10%	3,595	47%	50%	1,798	50%	1,797
Event Facility	0	Seats	1.76	1,9	0	5%	5%	5%	10%	0	0%	50%	0	50%	0
	0	S.F													
Health Club	40,000	S.F	32.93	1,10	1,317	20%	35%	5%	20%	450	0%	50%	225	50%	225
Subtotal Commercial	270,000	S.F			17,917					8,013	45%	50%	4,007	50%	4,006
Total Parcel Q	270,000	S.F			22,188					10,999	50%	50%	5,500	50%	5,499
Parcel W-1 / W-2															
Condominiums	568	D.U	4.16	1,2	2,365	5%	15%	5%		1,797	76%	50%	898	50%	899
	553,005	S.F													
Apartments	142	D.U	4.20	1,3	596	5%	20%	25%		335	56%	50%	168	50%	167
	139,728	S.F													
Subtotal Residential	710	D.U			2,961					2,132	72%	50%	1,066	50%	1,066
	692,733	S.F													
Hotel	0	Rooms	0.00	1,4	0					0		50%	0	50%	0
	0	S.F													
Office	681,000	S.F	5.53	1,5	3,767	0%	5%	40%	0%	2,148	57%	50%	1,074	50%	1,074
Retail	54,400	S.F	84.04	1,7	4,572	15%	20%	5%	40%	1,694	37%	50%	847	50%	847
Restaurant	10,000	S.F	89.95	1,8	900	15%	30%	5%	10%	423	47%	50%	211	50%	212
Event Facility	0	Seats	1.76	1,9	0					0		50%	0	50%	0
	0	S.F													
Health Club	0	S.F	32.93	1,10	0					0		50%	0	50%	0
Subtotal Commercial	745,400	S.F			9,239					4,265	46%	50%	2,132	50%	2,133
Total Parcel W-1 / W-2	1,438,133	S.F			12,200					6,397	52%	50%	3,198	50%	3,199

Table B-3 **Daily Trip Generation - Grand Avenue Revised Project 2013** 11/18/2013

Land Use	Quantity	Units	Trip Rates	Foot - note	Base Vehicle Trips	% Project Internal	% Walk-in / Walk-Out	% Transit, R/S, & Taxi	% Pass-By	Net Vehicle Trips	Net as % Base	Inbound		Outbound	
												%	Trips	%	Trips
Parcel L / M-2															
Condominiums	645	D.U	4.12	1,2	2,655	5%	15%	5%		2,018	76%	50%	1,009	50%	1,009
	643,611	S.F													
Apartments	271	D.U	4.20	1,3	1,138	5%	20%	25%		640	56%	50%	320	50%	320
	271,312	S.F													
Subtotal Residential	916	D.U			3,794					2,659	70%	50%	1,329	50%	1,329
	914,923	S.F													
Hotel	0	Rooms	0.00	1,4	0					0		50%	0	50%	0
	0	S.F													
Office	0	S.F	0.00	1,5	0					0		50%	0	50%	0
Retail	0	S.F		1,7	0	15%	20%	5%	30%	0		50%	0	50%	0
Restaurant	15,000	S.F	89.95	1,8	1,349	15%	30%	5%	10%	634	47%	50%	317	50%	317
Museum	115,231	S.F	10.14	1,11	1,168	0%	0%	0%	0%	1,168	100%	50%	585	50%	584
Health Club	0	S.F	32.93	1,10	0					0		50%	0	50%	0
Subtotal Commercial	130,231	S.F			2,518					1,803	72%	50%	902	50%	901
Total Parcel L / M-2	1,045,154	S.F			6,311					4,462	71%	50%	2,231	50%	2,230
Total All Parcels	2,753,287	S.F			40,699					21,858	54%	50%	10,930	50%	10,928

1. ITE Rates and Equations from Trip Generation, 7th Edition, Institute of Transportation Engineers, Washington, DC, 2003, except otherwise noted.
2. ITE 232 daily trip generation equation (T= 3.77(X)+223.66) for High-Rise Condominium / Townhouse was used.
3. ITE 222 daily trip rate for High-Rise Apartments was used.
4. ITE 310 daily trip generation equation (T = 8.95*(X) - 373.16) for Hotel was used.
5. ITE 715 trip generation equation (LN(T) = 0.60*LN(X) + 4.32) for Single Tenant Office Building was used.
6. ITE 850 daily trip generation equation (T = 66.95*(X) +1391.56) for Supermarket was used.
7. ITE 820 daily trip generation equation (LN(T) = 0.65*LN(X) + 5.83) for Shopping Center was used.
8. ITE 931 daily trip rate for Quality Restaurant was used.
9. ITE 444 daily trip rate for Movie Theater with Matinee is not available. Daily trip rate was estimated based on the ratio of ITE 443 weekday p.m peak hour of adjacent traffic to ITE 444 weekday p.m peak hour of adjacent traffic.
10. ITE 492 daily trip rate for Health / Fitness Club was used.
11. Trip rate from LACMA Entertainment Sstudy.
12. ITE 710 trip generation equation (LN(T) = 0.77*LN(X) + 3.65) for General Office Building was used.

SECOND ADDENDUM TO THE CERTIFIED EIR

THE GRAND AVENUE PROJECT

APPENDIX B

The Mobility Group
Transportation Strategies & Solutions

Memorandum

To: Tomas Caranza, LADOT

From: Michael Bates

Subject: Grand Avenue Project – Revised Project for Parcel Q:
Review of Necessary Traffic Mitigation Measures for Parcel Q Development

Date: April 9, 2014

This memorandum summarizes our review of the necessary traffic mitigation measures in the Grand Avenue Project FEIR, November 2006, updated for the revised Parcel Q development and the timing of their implementation. The Original Project Site Plan as processed in the 2006 EIR is shown in Figure 1, and covers four downtown blocks known as Parcel Q, Parcel W and Parcel L/M-2. This memorandum is a companion to the Memorandum titled "Grand Avenue Project – Updated Traffic Assessment for Parcel Q", dated February 3, 2014.

Background

Since 2006, two phases of the project have moved forward and are currently under construction on Parcel L/M-2. These are the Broad Museum, and a 271-unit apartment residential building.

The developer, Grand Avenue L.A., LLC (an affiliate of Related California and The Related Companies, L.P.), is now processing a project change with the Los Angeles Grand Avenue Authority ("Authority"), in order to move forward with development on Parcel Q. The change in Project Description is primarily limited to Parcel Q along with some previously approved changes to Parcel L/M-2 ("Revised Project"). A comparison of the Original EIR Project and the Revised Project is shown in Table 1.

A separate memorandum February 3, 2014 documented an evaluation of the effect on the 2006 EIR traffic analysis attributable to changes in (i) the proposed development program for Parcel Q and (ii) the surrounding environment relative to the projections and assumptions made in the 2006 EIR.

In summary, that assessment demonstrated:

- That the trip generation from the Revised Project does not exceed the trip totals for the project analyzed in the 2006 EIR ("Original Project").
- That the circumstances affecting the Revised Project's traffic impacts, namely, the existing traffic in the relevant geographic area and future traffic associated with related projects, have not substantially changed relative to the Original Project.
- That the Revised Project would not cause any new significant traffic impacts or a substantial increase in a previously identified significant traffic impact, and therefore, no additional traffic analysis is necessary.

Focus of This Memorandum

This memorandum is a review of the Grand Avenue Project traffic mitigation program and our summary of which measures we consider to be necessary for the Revised Project on Parcel Q in order to mitigate or reduce previously identified significant impacts. The Parcel Q development program will comprise the land uses shown in Table 1.

The Mitigation Monitoring and Reporting Program in the 2006 EIR identified seven mitigation measures relating to traffic. Those measures are numbered as B-1 through B-7 and are described further below in this memorandum.

Since 2006 two phases of the project have moved forward and are currently under construction on Parcel L/M-2. These are the Broad Museum, and a 271-unit apartment residential building. Previous assessments (The Mobility Group Memorandum dated April 23, 2010 and LADOT Letter dated May 19, 2010 for the Broad Museum, and The Mobility Group Memorandum dated February 8, 2012 and LADOT Letter dated April 2, 2012 for the apartment building) identified which mitigations in the overall program would be appropriate for those developments.

This memorandum addresses the traffic impacts of the Revised Parcel Q Project in order to determine which mitigations are necessary to mitigate or reduce previously identified significant impacts for that parcel.

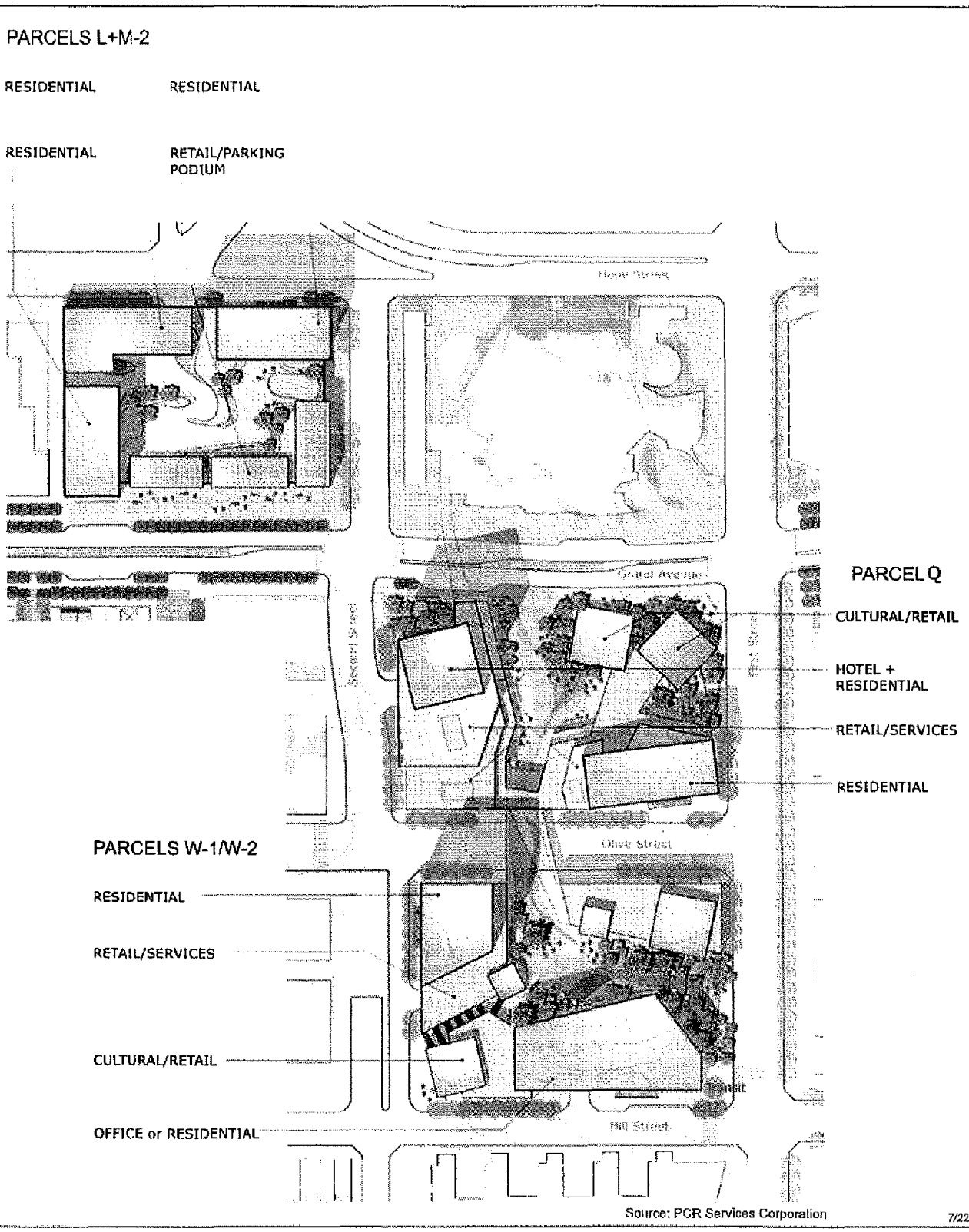

Figure 1
Conceptual Parcel Development Plan - 2006 EIR

Table 1 Grand Avenue Parcel Q Update - Land Use Program Comparison 2/18/2014

Land Use	Units	Original Program (2006 EIR)	Revised Program (2013 Update)
Parcel Q			
Condominiums	D.U.	400	360
Apartments	D.U.	100	90
Hotel	Rooms	275	300
Market	S.F.	53,000	10,000
Retail	S.F.	97,750	85,000
Restaurants	S.F.	42,000	85,000
Event Facility	Seats	250	-
Health Club	S.F.	50,000	40,000
Office	S.F.	-	50,000
Parcel W-1/W-2			
Condominiums	D.U.	568	568
Apartments	D.U.	142	142
Office	S.F.	681,000	681,000
Retail	S.F.	54,400	54,400
Restaurant	S.F.	10,000	10,000
Parcel L/M-2			
Condominiums	D.U.	680	645
Apartments	D.U.	170	271
Museum	S.F.	-	115,231
Retail	S.F.	73,100	-
Restaurant	S.F.	15,000	15,000

F:\Projects 2013\Grand Avenue Parcel Q Update\Mitigations\Mitigation Memo to LADOT 2-18-14\Tables\[Table 1 - Land Use Comparison - 2-18-14.xlsx]Sheet1

Methodology

The analysis estimated the number of vehicle trips that would be generated by the Revised Parcel Q development. This is summarized in Table 2. The detailed trip generation calculations are shown in Appendix A.

The total vehicle trips for the Original Grand Avenue Project, as calculated in the 2006 EIR, would be 1,551 trips in the AM peak hour and 2,464 trips in the PM peak hour. The currently proposed Revised Project for Parcel Q would generate 401 trips in the AM peak hour and 981 trips in the PM peak hour. These would represent 26% and 40% of the total project trips respectively.

Adding in the two phases of the project under construction on Parcel L/M-2, the total number of trips generated after construction of those projects and Parcel Q would be 494 AM peak hour trips and 1,195 PM peak hour trips, which would represent 32% and 49% of the total trips for the overall project respectively.

An impact analysis was then conducted (in the same manner as for the Original Project in the 2006 EIR) that assigned the trips generated by the two projects on Parcel L/M-2 and the trips generated by the Revised Parcel Q Project to the Future Without Project volumes roadway traffic to assess the potential for significant impacts. (The Future Without Project volumes include existing volumes, plus ambient growth plus related project trips, for the Project buildout timeline. This is therefore a conservative analysis as it is conducted only for Parcel Q when in fact the Future Without Project volumes would be lower than at buildout).

Analysis Results

The results of that analysis are summarized in Table 3. The Original Project was identified as causing 7 significant traffic impacts in the AM peak hour and 17 significant impacts in the PM peak hour in total. The number of significant impacts after the Revised Parcel Q Project is constructed (and including the two projects on Parcel L/M-2) would be 2 impacts in the AM peak hour and 12 impacts in the PM peak hour. The detailed impact analysis is shown in Table 4, which shows in the same format as the Original EIR Traffic Study, the intersection volume/capacity (V/C) ratios and Levels of Service for all study intersections for the Future Without Project and Future With Project Conditions (Parcel Q) and identifies any significant impacts.

As shown in Table 4, the AM peak hour impacts would occur at:

Hope Street & First Street

Table 2. Trip Generation Comparison – Original Project Total & Revised Project Parcel Q only

Scenario	Vehicle Trips	
	AM Peak Hour	PM Peak Hour
Original Project Total Trips	1,551	2,464
L/M-2 to Date	93	213
Revised Project (Parcel Q)	401 (26%)	981 (40%)
Revised Project L/M-2 to Date & Parcel Q	494 (32%)	1,195 (49%)

Note: Percentages are % of original Project Total Trips.

Table 3. Significant Traffic Impacts for Parcel Q

Scenario	No. of Significant Impacts	
	AM Peak Hour	PM Peak Hour
Original Project (Total)	7	17
Revised Project (Parcel Q)	2	12

1. Analysis includes Parcel Q, and two projects under construction on Parcel L(M-2).

Table 4 **Intersection Level Of Service - Future With Project Conditions - Project with County Office Building Option** 2/18/2014

2013 Revised Project - Parcel Q (& Two Projects on Parcel L/M-2)

No.	Intersection	A.M Peak						P.M Peak					
		Future Without Project Condtions		Future With Project Conditions		Change in V/C	Significant Impact	Future Without Project Condtions		Future With Project Conditions		Change in V/C	Significant Impact
		V/C	LOS	V/C	LOS			V/C	LOS	V/C	LOS		
1	Figueroa St. / 3rd St.	0.827	D	0.831	D	0.004	No	0.965	E	0.977	E	0.012	Yes
2	Figueroa St. / 5th St.	0.487	A	0.489	A	0.002	No	0.781	C	0.787	C	0.006	No
3	Figueroa St. / 6th St.	0.626	B	0.628	B	0.002	No	0.650	B	0.655	B	0.005	No
4	I-110 Off Ramp / Temple St.	0.398	A	0.399	A	0.001	No	0.409	A	0.410	A	0.001	No
5	Hope St. / Temple St. / US-101 Ramps	0.902	E	0.907	E	0.005	No	0.971	E	0.989	E	0.018	Yes
6	Hope St. / 1st St.	0.925	E	0.935	E	0.010	Yes	0.733	C	0.802	D	0.069	Yes
7	Hope St. / GTK Way / 2nd Place	0.420	A	0.448	A	0.028	No	0.776	C	0.830	D	0.054	Yes
8	Flower St. / 3rd St.	0.671	B	0.675	B	0.004	No	0.546	A	0.558	A	0.012	No
9	Flower St. / 5th St.	0.439	A	0.442	A	0.003	No	0.517	A	0.525	A	0.008	No
10	Flower St. / 6th St.	0.528	A	0.531	A	0.003	No	0.498	A	0.507	A	0.009	No
11	Grand Ave. / US-101 Ramps / I-110 Ramps	0.693	B	0.696	B	0.003	No	0.994	E	1.041	F	0.047	Yes
12	Grand Ave. / Temple St.	0.930	E	0.922	E	-0.008	No	0.844	D	0.867	D	0.023	Yes
13	Grand Ave. / 1st St.	0.791	C	0.802	D	0.011	No	0.850	D	0.868	D	0.018	No
14	Grand Ave. / Upper 2nd St.	0.537	A	0.622	B	0.085	No	0.504	A	0.673	B	0.169	No
15	Grand Ave. / 5th St.	0.487	A	0.492	A	0.005	No	0.565	A	0.582	A	0.017	No
16	Olive St. / 1st St.	0.531	A	0.549	A	0.018	No	0.627	B	0.726	C	0.099	Yes
17	Olive St. / 2nd St.	0.283	A	0.343	A	0.060	No	0.406	A	0.526	A	0.120	No
18	Olive St. / 4th St.	0.437	A	0.467	A	0.030	No	0.653	B	0.714	C	0.061	Yes
19	Olive St. / 5th St.	0.623	B	0.641	B	0.018	No	0.812	D	0.838	D	0.026	Yes
20	Olive St. / 6th St.	0.402	A	0.409	A	0.007	No	0.486	A	0.501	A	0.015	No
21	Hill St. / Temple St.	0.762	C	0.810	D	0.048	Yes	0.933	E	0.937	E	0.004	No
22	Hill St. / 1st St.	0.744	C	0.755	C	0.011	No	0.911	E	0.936	E	0.025	Yes
23	Hill St. / 2nd St.	0.765	C	0.773	C	0.008	No	0.679	B	0.732	C	0.053	Yes
24	Hill St. / 3rd St.	0.968	E	0.972	E	0.004	No	1.018	F	1.027	F	0.009	No
25	Hill St. / 4th St.	0.518	A	0.524	A	0.006	No	0.760	C	0.779	C	0.019	No
26	Hill St. / 6th St.	0.457	A	0.459	A	0.002	No	0.586	A	0.592	A	0.006	No
27	Broadway / Temple St.	0.858	D	0.863	D	0.005	No	0.834	D	0.847	D	0.013	No
28	Broadway / 1st St.	0.824	D	0.839	D	0.015	No	0.841	D	0.870	D	0.029	Yes
29	Broadway / 2nd St.	0.613	B	0.615	B	0.002	No	0.748	C	0.746	C	-0.002	No
30	Broadway / 4th St.	0.474	A	0.480	A	0.006	No	0.646	B	0.660	B	0.027	No
31	Spring St. / 1st St.	0.592	A	0.600	A	0.008	No	0.582	A	0.601	B	0.019	No
32	Spring St. / 2nd St.	0.609	B	0.612	B	0.003	No	0.509	A	0.539	A	0.030	No

Hill Street & Temple Street

As also shown in Table 4, the PM peak hour impacts would occur at:

Figueroa Street & Third Street
Hope Street & Temple Street & US-101 Ramps
Hope Street & First Street
Hope Street & Gen. Thad Kosciuszko Way & Second Place
Grand Avenue & US-101/I-110 Ramps
Grand Avenue & Temple Street
Olive Street & First Street
Olive Street & Fourth Street
Olive Street & Fifth Street
Hill Street & First Street
Hill Street & Second Street
Broadway & First Street

The 2006 EIR for the Original Project, identified that at Project buildout, implementation of the mitigation measure to install the ATCS traffic signal upgrade in the area of the project (see further discussion below under EIR Mitigation Measure B-5) would fully mitigate the significant impacts at Hope Street & First Street and at Hill Street & Temple Street in the AM peak hour and would fully mitigate the significant impacts at the intersections of Figueroa Street & Third Street and Hill Street & First Street in the PM peak hour. It would partially mitigate the impacts at Hope Street & Temple Street & US-101 Ramps, Hope Street & First Street, Hope Street & Gen. Thad Kosciuszko Way & Second Place, Grand Avenue & US-101/I-110 Ramps, Grand Avenue & Temple Street, Olive Street & First Street, Olive Street & Fourth Street, Olive Street & Fifth Street, Hill Street & Second Street, and at Broadway & First Street during the PM peak hour. The EIR further identified that the significant impacts at ten intersections in the PM peak hour would remain as significant unavoidable impacts and these were included in the City's findings of overriding consideration. Mitigation measures are discussed further in the following section.

Assignment of Traffic & Parking Mitigation Measures in FEIR to Revised Parcel Q Project

The following section identifies which mitigation measures would appropriately be applied to Parcel Q based on the preceding impact analysis. The discussion addresses all mitigation measures identified in the 2006 EIR for the Original Project.

Construction Measures

Measure B-1. Prepare Construction Traffic Control/Management Plan

Does apply to Parcel Q.

Measure B-2. Distribute Construction Traffic Control/Management Plan

Does apply to Parcel Q.

Measure B-3. Provide Off-Street Parking for Construction Workers

Does apply to Parcel Q.

Operations Measures

Measure B-4. Prepare Transportation Demand Management Plan for County Office Building

Does not apply to Parcel Q. This measure applies only to the County Office Building which is located on Parcel W not Parcel Q.

Measure B-5. Participation in Areawide ATCS Program

The principal mitigation measure identified in the Grand Avenue Project EIR and Conditions of Approval (FEIR, Measure B-5) was a proportionate share contribution to Downtown Adaptive Traffic Control System (ATSC), if not otherwise implemented. This measure comprises the provision of new signal controllers, CCTV cameras, vehicle detection devices, and signal improvements at specified intersections in the North Downtown Area. Because the

ATCS improvements are only effective when implemented areawide, the Project EIR recognized that these improvements would all be implemented at one time. It was further recognized that the Grand Avenue Project Phase I development (Parcel Q – the block bounded by Grand Avenue, 1st Street, Olive Street, and 2nd Street) would be responsible for this mitigation measure as this block was expected to be the first block to be developed and would generate 40% of the overall trips from the Proposed Project. Implementation of this mitigation measure by Parcel Q would also provide mitigation for all three Project phases, not just for Phase I.

Since the 2006 EIR LADOT has received state funding for, and is in the process of implementing, the ATCS upgrade to the signal system citywide. However, LADOT has stated that the Downtown traffic signal system has not yet been fully upgraded to operate under this enhanced system and that it is unclear if the City has all of the necessary funds required to fully implement the system. Neither the scope or the final cost of the system upgrade has been finalized. Therefore, the Revised Project may still have some financial commitment with respect to this mitigation measure. The Original Project approval identified the specific components of the ATCS upgrades that are required of the Project. At this time, LADOT is taking the position that Measure B-5 remains a mitigation measure for the Revised Project, although the required financial contributions for ATCS upgrades would be definitively determined by LADOT prior to the issuance of any building permit for each phase.

Measure B-6. Measures to Reduce Project's Traffic and Circulation Impacts

Specifics to be determined in conjunction with LADOT. See menu of possible items below.

1st Bullet. *Provide Enhanced Walking Connections*

Does apply to Parcel Q. Applies to the sidewalks adjacent to the Parcel Q site. Measures can be part of site design.

2nd Bullet. *Provide Enhanced Bus Stop(s)*

Not applicable to Parcel Q. No existing bus stops along Parcel Q frontage.

3rd Bullet. *Provide Transit Information Kiosk(s)*

A transit kiosk is primarily oriented to commercial uses. This measure is applicable to Parcel Q due to commercial components.

4th Bullet. *Participate in Share Car Program*

Does apply to Parcel Q. Project proposes to support provision of a total of three on-street parking spaces as described in EIR Mitigation Measure.

5th Bullet. *Provide Vehicular Directional Signage*

Does apply to Parcel Q. Directional signage for the parking will be implemented in the project design.

Mitigation Measure B-7. *Improvement at Intersection of Third Street & Hill Street.*

Does not apply. Parcel Q would not cause a significant impact at the Hill & 3rd intersection (see Table 4) as previously discussed, so implementation of this measure is not necessary for completion of the Revised Parcel Q Project.

Assignment of Traffic Requirements in LADOT Letter of September 8, 2006 (Overall Project)

See section on Project Requirements, page 4 of Letter. (Letter attached in Appendix B hereto).

E. Traffic Signal Enhancements

May apply to Parcel Q as determined by LADOT. Same as DEIR/FEIR Mitigation B-5, (Participation in Areawide ATCS Program), as described above.

F. Hill Street & 3rd Street

Does not apply to Parcel Q.
Same as FEIR Mitigation B-7. (Improvement at intersection of Third Street & Hill Street). Does not apply for the same reason stated above.

G. Construction Impacts

Does apply to Parcel Q. Same as DEIR/FEIR Mitigation B-1.

H. Highway Dedication and Street Widening Requirements

Does apply to Parcel Q per the conditions in LADOT letter. Check with BOE to determine actual requirements.

I. Project Frontage Street Improvements

Does apply to Parcel Q with respect to Grand Avenue and First Street frontages.

J. Improvement and Mitigation Measures Implementation

Does apply to Parcel Q to extent any physical improvements carried out in public right-of-way.

K. Parking Analysis

Does apply to Parcel Q.

L. Special Events

Does not apply to Parcel Q because Special Events refers to Civic Park component of overall Project.

M. Transportation Demand Management Plan (Option 1 Only)

Does not apply to Parcel Q because applies only to County Office building component, which is on Parcel W.
Same as FEIR Mitigation Measure B-4. See above.

N. Driveway Access

Does apply to Parcel Q. Driveway designs need to be coordinated with LADOT.

Summary

The above evaluation identified which mitigation measures would be applied to the Revised Parcel Q development. The Revised Project would still meet the mitigation measures as stated in the Original Project EIR until, or if and when, LADOT approves their deferral based on the above evaluation.

Appendix A

Revised Project 2013

Trip Generation Tables

Table A-1 **A.M Peak Hour Trip Generation - Project with County Office Building Option**
2013 Revised Project - Parcel Q (& Two Projects on Parcel L/M-2)

2/18/2014

Land Use	Quantity	Units	Trip Rates	Foot - note	Base Vehicle Trips	% Project Internal	% Walk-In / Walk-Out	% Transit, R/S, & Taxi	% Pass-By	Net Vehicle Trips	Net as % Base	Inbound		Outbound	
												%	Trips	%	Trips
Parcel Q															
Condominiums	360	D.U	0.37	1,2	133	5%	15%	5%		101	76%	19%	19	81%	82
		S.F													
Apartments	90	D.U	0.30	1,3	27	5%	20%	25%		15	56%	25%	4	75%	11
		S.F													
Subtotal Residential	450	D.U			160					116	73%	20%	23	80%	93
	0	S.F													
Hotel	300	Rooms	0.53	1,4	160	5%	10%	20%		109	68%	61%	66	39%	43
		S.F													
Office	50,000	S.F	2.15	1,12	108		5%	40%	0%	61	57%	88%	54	12%	7
Market	10,000	S.F	1.21	1,6	12	15%	10%	5%	40%	5	43%	61%	3	39%	2
Retail	85,000	S.F	1.67	1,7	142	15%	20%	5%	30%	61	43%	61%	37	39%	24
Restaurant	85,000	S.F	0.81	1,8,9	69	15%	30%	5%	10%	32	46%	52%	16	48%	15
Event Facility	0	Seats	0.00	1,10	0	5%	5%	5%	10%	0			0		0
	0	S.F													
Health Club	40,000	S.F	1.21	1,11	48	20%	35%	5%	20%	17		42%	7	58%	10
Subtotal Commercial	270,000	S.F			379					177	47%	67%	118	33%	58
Total Parcel Q	270,000	S.F			698					401	57%	52%	207	48%	194
Parcel W-1 / W-2															
Condominiums	0	D.U	0.00	1,2	0	5%	15%	5%		0		19%	0	81%	0
	0	S.F													
Apartments	0	D.U	0.30	1,3	0	5%	20%	25%		0		25%	0	75%	0
	0	S.F													
Subtotal Residential	0	D.U			0					0			0		0
	0	S.F													
Hotel	0	Rooms	0.00	1,4	0					0		61%	0	39%	0
	0	S.F													
Office	0	S.F	0.00	1,5	0	0%	5%	40%	0%	0		89%	0	11%	0
Retail	0	S.F		1,7	0	15%	20%	5%	40%	0		61%	0	39%	0
Restaurant	0	S.F	0.81	1,8,9	0	15%	30%	5%	10%	0		52%	0	48%	0
Event Facility	0	Seats	0.00	1,10	0					0			0		0
	0	S.F													
Health Club	0	S.F	1.21	1,11	0					0		42%	0	58%	0
Subtotal Commercial	0	S.F			0					0			0		0
Total Parcel W-1 / W-2	0	S.F			0					0			0		0

Table A-1 **A.M Peak Hour Trip Generation - Project with County Office Building Option**
2013 Revised Project - Parcel Q (& Two Projects on Parcel L/M-2)

2/18/2014

Land Use	Quantity	Units	Trip Rates	Foot - note	Base Vehicle Trips	% Project Internal	% Walk-In / Walk-Out	% Transit, R/S, & Taxi	% Pass-By	Net Vehicle Trips	Net as % Base	Inbound		Outbound	
												%	Trips	%	Trips
Parcel L / M-2															
Condominiums		D.U S.F	0.00	1,2	0	5%	15%	5%		0		19%	0	81%	0
Apartments	271 271,312	D.U S.F	0.30	1,3	81	5%	20%	25%		46	56%	25%	11	75%	34
Subtotal Residential	271 271,312	D.U S.F			81					46	57%	25%	11	75%	34
Hotel	0 0	Rooms S.F	0.00	1,4	0					0		61%	0	39%	0
Office	0	S.F	0.00	1,5	0					0		88%	0	12%	0
Retail	0	S.F		1,7	0	15%	20%	5%	50%	0		61%	0	39%	0
Restaurant		S.F	0.81	1,8,9	0	15%	30%	5%	10%	0		52%	0	48%	0
Museum	115,231	S.F	0.41	1,11	47	0%	0%	0%	0%	47	100%	95%	45	5%	2
Health Club	0	S.F	4.05	1,10	0					0		51%	0	49%	0
Subtotal Commercial	115,231	S.F			47					47	100%	95%	45	5%	2
Total Parcel L / M-2	386,543	S.F			129					93	73%	61%	56	40%	37
Total All Parcels	656,543	S.F			827					494	60%	53%	263	47%	232

1. ITE Rates and Equations from Trip Generation, 7th Edition, Institute of Transportation Engineers, Washington, DC, 2003, except otherwise noted.
2. ITE 232 trip generation equation (T=0.29(X)+28.25) for High-Rise Condominium / Townhouse was used.
3. ITE 222 trip rate for High-Rise Apartments was used.
4. ITE 310 trip generation equation (LN(T) = 1.24*LN(X) - 2.00) for Hotel was used.
5. ITE 715 trip generation equation (T = 1.66*(X) + 22.94) for Single Tenant Office Building was used.
6. ITE 850 trip generation equation (LN(T) = 1.70*LN(X) - 1.42) for Supermarket was used.
7. ITE 820 trip generation equation (LN(T) = 0.60*LN(X) + 2.29) for Shopping Center was used.
8. ITE 931 trip rate for Quality Restaurant was used.
9. Directional distribution for the AM peak hour is not available. Directional distribution of 52 % entering and 48 % existing was assumed based on ITE 932 for High-Turnover Sit Down Restaurant.
10. ITE 444 trip rate for Movie Theater with Matinee was used.
11. Trip rate from LACMA Enhancement Study, adjusted for local details of Revised Project.
12. ITE 710 trip generaion equation (LN(T) = 0.80* LN(X) + 1.55) for General Office Building was used.

Table A-2 **P.M Peak Hour Trip Generation - Project with County Office Building Option**
2013 Revised Project - Parcel Q (& Two Projects on Parcel L/M-2)

2/18/2014

Land Use	Quantity	Units	Trip Rates	Foot-notes	Base Vehicle Trips	% Project Internal	% Walk-In / Walk-Out	% Transit, R/S, & Taxi	% Pass-By	Net Vehicle Trips	Net as % Base	Inbound		Outbound	
												%	Trips	%	Trips
Parcel Q															
Condominiums	360	D.U	0.38	1,2	138	5%	15%	5%		105	76%	62%	65	38%	40
		S.F													
Apartments	90	D.U	0.35	1,3	32	5%	20%	25%		18	56%	61%	11	39%	7
		S.F													
Subtotal Residential	450	D.U			169					122	72%	62%	76	38%	47
	0	S.F													
Hotel	300	Rooms	0.59	1,4	177	5%	10%	20%		120	68%	53%	64	47%	57
		S.F													
Office	50,000	S.F	2.70	1,12	135		5%	40%		77	57%	17%	13	83%	64
Supermarket	10,000	S.F	15.13	1,6	151	15%	10%	5%	40%	64	42%	51%	33	49%	31
Retail	85,000	S.F	6.62	1,7	562	15%	20%	5%	30%	243	43%	48%	117	52%	126
Restaurant	85,000	S.F	7.49	1,8	637	15%	30%	5%	10%	299	47%	67%	200	33%	99
Event Facility	0	Seats	0.07	1,9	0	5%	5%	5%	10%	0	0%	75%	0	25%	0
	0	S.F													
Health Club	40,000	S.F	4.05	1,10	162	20%	35%	5%	20%	55	0%	51%	29	49%	27
Subtotal Commercial	270,000	S.F			1,648					738	45%	53%	391	47%	348
Total Parcel Q	270,000	S.F			1,994					981	49%	54%	530	46%	451
Parcel W-1 / W-2															
Condominiums		D.U	0.00	1,2	0	5%	15%	5%		0		62%	0	38%	0
		S.F													
Apartments		D.U	0.35	1,3	0	5%	20%	25%		0		61%	0	39%	0
		S.F													
Subtotal Residential	0	D.U			0					0			0		0
	0	S.F													
Hotel	0	Rooms	0.59	1,4	0					0		53%	0	47%	0
	0	S.F													
Office		S.F	0.00	1,5	0	0%	5%	40%	0%	0		15%	0	85%	0
Retail		S.F		1,7	0	15%	20%	5%	40%	0		48%	0	52%	0
Restaurant		S.F	7.49	1,8	0	15%	30%	5%	10%	0		67%	0	33%	0
Event Facility	0	Seats	0.07	1,9	0					0		75%	0	25%	0
	0	S.F													
Health Club	0	S.F	4.05	1,10	0					0		51%	0	49%	0
Subtotal Commercial	0	S.F			0					0			0		0
Total Parcel W-1 / W-2	0	S.F			0					0			0		0

Table A-2 **P.M Peak Hour Trip Generation - Project with County Office Building Option**
2013 Revised Project - Parcel Q (& Two Projects on Parcel L/M-2)

2/18/2014

Land Use	Quantity	Units	Trip Rates	Foot-notes	Base Vehicle Trips	% Project Internal	% Walk-In / Walk-Out	% Transit, R/S, & Taxi	% Pass-By	Net Vehicle Trips	Net as % Base	Inbound		Outbound	
												%	Trips	%	Trips
Parcel L / M-2															
Condominiums		D.U S.F	0.00	1,2	0	5%	15%	5%		0		62%	0	38%	0
Apartments	271 271,312	D.U S.F	0.35	1,3	95	5%	20%	25%		54	57%	61%	33	39%	21
Subtotal Residential	271 271,312	D.U S.F			95					54	57%	61%	33	39%	21
Hotel	0 0	Rooms S.F	0.59	1,4	0					0		53%	0	47%	0
Office	0	S.F	0.00	1,5	0					0		17%	0	83%	0
Retail	0	S.F	0.00	1,7	0	15%	20%	5%	50%	0		48%	0	52%	0
Restaurant		S.F	7.49	1,8	0	15%	30%	5%	10%	0		67%	0	33%	0
Museum	115,231	S.F	1.38	1,11	159	0%	0%	0%	0%	159	100%	22%	35	78%	124
Health Club	0	S.F	4.05	1,10	0					0		51%	0	49%	0
Subtotal Commercial	115,231	S.F			159					159	100%	22%	35	78%	124
Total Parcel L / M-2	386,543	S.F			254					213	84%	32%	68	68%	145
Total All Parcels	656,543	S.F			2,248					1,195	53%	50%	598	50%	596

1. ITE Rates and Equations from Trip Generation, 7th Edition, Institute of Transportation Engineers, Washington, DC, 2003, except otherwise noted.
2. ITE 232 trip generation equation (T=0.34(X)+15.47) for High-Rise Condominium / Townhouse was used.
3. ITE 222 trip rate for High-Rise Apartments was used.
4. ITE 310 trip rate for Hotel was used.
5. ITE 715 trip generation equation (T=1.52(X)+ 34.88) for Single Tenant Office Building was used.
6. ITE 850 trip generation equation (Ln(T) = 0.79*LN(X) + 3.20) for Supermarket was used.
7. ITE 820 trip generation equation (LN(T) = 0.66*LN(X) + 3.40) for Shopping Center was used.
8. ITE 931 trip rate for Quality Restaurant was used.
9. ITE 444 trip rate for Movie Theater with Matinee was used.
10. ITE 492 trip rate for Health / Fitness Club was used.
11. Trip rate from LACMA Enhancement Study.
12. ITE 710 trip generation equation (T = 1.12(X) + 78.84) for General Office Building was used.

Appendix B

LADOT Letter of September 8, 2006

CITY OF LOS ANGELES
CALIFORNIA

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GENERAL MANAGER

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1st St & Grand Av
DOT Case No. CEN 06-3022

September 8, 2006

Martha Welborne
Los Angeles Grand Avenue Authority
Grand Avenue Committee, Inc.
445 South Figueroa Street, Suite 3400
Los Angeles, CA 90071

TRAFFIC IMPACT ASSESSMENT FOR THE PROPOSED GRAND AVENUE PROJECT (DEIR SCH NO. 2005 091041)

The Department of Transportation (DOT) has completed its traffic assessment of the proposed Grand Avenue Project generally located along Grand Avenue between Cesar Chavez Avenue and 5th Street in downtown Los Angeles. The project consists of the following two development options:

Option 1 (County Office Building)
- 2,060 residential units (1,648 condominiums & 412 apartments)
- 275 room hotel
- 449,000 square-feet of retail space
- 681,000 square-feet of office space for a County Office Building

Option 2 (Additional Residential)
- 2,660 residential units (2,128 condominiums & 532 apartments)
- 275 room hotel
- 449,000 square-feet of retail space

The retail component for both options would include restaurants, a health club, an event facility, and a supermarket. Included in both land use options, the project would also provide pedestrian enhancements and streetscape improvements along the Grand Avenue right-of-way between Cesar Chavez Avenue and 5th Street, and a new 16-acre park within the Civic Mall that connects the Los Angeles City Hall to Grand Avenue. The streetscape program for Grand Avenue would include wider sidewalks, where feasible, improved street lighting and signage, pedestrian amenities including benches and bus shelters, and new street trees. The streetscape proposal would not impact the existing roadway configuration or available on-street parking. The project is expected to be completed by year 2015.

The project is expected to result in adverse impacts to the area's transportation system. A discussion of the traffic impacts and of the mitigation measures needed to offset these impacts follows.

DISCUSSION AND FINDINGS

The traffic study, dated May 30, 2006, for the Grand Avenue Project was prepared by the Mobility Group with input and subsequent revisions by DOT.

A. Study Area

The project site consists of five parcels located in the Bunker Hill Urban Renewal Project area, the Grand Avenue right-of-way between Cesar Chavez Avenue and 5th Street, and the Los Angeles Civic Mall between Grand Avenue and Spring Street. The project study area is generally bounded by the US-101 Freeway to the north, Spring Street to the east, 6th Street to the south, and Figueroa Street to the west. Within this study area, 32 intersections were identified for detailed analysis.

The proposed development for both options is concentrated along the east side of Grand Avenue between 1st Street and 2nd Street, along the east side of Olive Street between 1st Street and 2nd Street, and at the southwest corner of Grand Avenue and Second Street. Specifically, the land uses are planned as follows:

Location	Option 1 Land Use Proposal	Option 2 Land Use Proposal
East side of Grand Avenue between 1st Street and 2nd Street	400 Condominiums 100 Apartments 284,000 sq. ft. Retail 275 Hotel rooms	400 Condominiums 100 Apartments 284,000 sq. ft. Retail 275 Hotel rooms
East side of Olive Street between 1st Street and 2nd Street	568 Condominiums 142 Apartments 64,000 sq. ft. Retail 681,000 sq. ft. County Office	1,048 Condominiums 262 Apartments 64,000 sq. ft. Retail
Southwest corner of Grand Avenue and Second Street	680 Condominiums 170 Apartments 101,000 sq. ft. Retail	680 Condominiums 170 Apartments 101,000 sq. ft. Retail

B. Trip Generation

After taking into account the trip credits allowed for the existing uses that will be replaced by the proposed project, Option 1 is estimated to generate approximately

1,551 trips in the a.m. peak hour and 2,464 trips in the p.m. peak hour (see **Attachment A**). Given similar trip credits, Option 2 is estimated to generate approximately 1,019 trips in the a.m. peak hour and 2,003 trips in the p.m. peak hour (see **Attachment B**). These trip generation estimates also include discounts given for walk trips, pass-by trips, transit trips and internal trips. Given the mixed-use nature of the project and the comprehensive transit system afforded to employees, visitors, and residents of downtown Los Angeles, allowing trip credits for this project is acceptable to DOT.

C. Traffic Impacts

In order to evaluate the effects and significant impacts of the project traffic on the roadway network, the significance of the traffic impacts is measured in terms of change to the volume-to-capacity (V/C) ratio between the "future no project" and the "future with project" scenarios. This change in the V/C ratio is compared to DOT's established threshold standards to assess the project-related traffic impacts. **Attachment C** identifies DOT's criteria for determining significant traffic impacts. DOT has determined that, of the 32 total intersections studied, the project would result in significant traffic impacts at 18 intersections for both options. The following intersections will be significantly impacted by both project land use options:

1. Figueroa Street and 3rd Street
2. Hope Street/US-101 Ramps and Temple Street
3. Hope Street and 1st Street
4. Hope Street and 2nd Place/General Thaddeus Kosciuszko Way
5. Grand Avenue and US-101 Ramps/I-110 Ramps
6. Grand Avenue and Temple Street
7. Grand Avenue and 1st Street
8. Grand Avenue Upper 2nd Street
9. Olive Street and 1st Street
10. Olive Street and 4th Street
11. Olive Street and 5th Street
12. Hill Street and Temple Street
13. Hill Street and 1st Street
14. Hill Street and 2nd Street
15. Hill Street and 3rd Street
16. Hill Street and 4th Street
17. Broadway and Temple Street
18. Broadway and 1st Street

Attachment D summarizes the morning and afternoon peak hour levels-of-service (LOS) calculated for all 32 study intersections for the different scenarios and indicates the extent of the project-related traffic impacts for Option 1. Similarly, **Attachment E** summarizes the LOS results for project Option 2.

While suitable mitigation measures are recommended to address the significant traffic impacts of both project options, not all of the significantly impacted intersections will be fully mitigated. Under Option 1, the project will fully mitigate 6 of the significant impacts, but 12 of 18 intersections are partially mitigated and remain significantly impacted. Under Option 2, the project will fully mitigate 11 significant impacts, but 7 out of 18 intersections are partially mitigated and remain significantly impacted. More specific information on the recommended traffic mitigation measures is provided below under "Project Requirements."

D. Parking and Access

The proposed project would provide 5,035 parking spaces for the Option 1 land use proposal. Should Option 2 be the preferred alternative, then the proposal is to provide 5,255 parking spaces. All proposed parking would be provided in podium (street-level) and subterranean parking structures.

A new site access plan for the County Mall parking garage is proposed as part of the project design. In order to accommodate the streetscape enhancements proposed for Grand Avenue, a reconfiguration of the access ramps from Grand Avenue to the parking garage is proposed. The garage currently provides access to and from Grand Street and to and from Hill Street. The access on Grand Avenue will be revised to allow for only right-turns into and out of the parking structure driveway. This would affect morning commuters that would normally turn left from southbound Grand Avenue into the parking garage driveway. Instead, now all southbound commuters would have to enter by turning right from the Hill Street driveway. The traffic study took into account any redirected traffic associated with this reconfiguration of the parking garage access plan.

PROJECT REQUIREMENTS

The two project alternatives would result in significant traffic impacts at 18 of the 32 study intersections. It should be noted that DOT and the project traffic consultant evaluated several physical traffic mitigation improvement options at these intersections to fully mitigate the impacts; however, with the exception of one location at Hill Street and 3rd Street, no feasible mitigations were identified due to the constraints of the existing physical conditions. In some cases, street widening is not an option due to right-of-way constraints. Also, in other cases, it is not practical nor desirable to widen the street at the expense of reduced sidewalk widths. Moreover, with high pedestrian flows in downtown Los Angeles and with the City's goal of providing a pedestrian friendly and walkable environment in this area, street widening opportunities were not available. Because of these constraints and conflicts, the required mitigations will not fully mitigate all project traffic impacts.

The following project requirements will be applicable to both Options 1 and 2:

E. Traffic Signal Enhancements

The applicant shall construct or contribute a proportionate share of the Downtown Adaptive Traffic Control System (ATCS) sub-system and fund a proportionate share of the ATCS software integration costs. Please see **Attachment F** for more specific details on this project requirement.

Implementing this traffic signal enhancement would fully mitigate five of the 18 impacted study intersections for Option 1. For the remaining 13 intersections, while partially mitigated, the signal enhancement would not reduce the impact to a level of insignificance. The intersections that would be partially mitigated after implementation of the Downtown ATCS improvements are:

1. Hope Street/US-101 Ramps and Temple Avenue
2. Hope Street and 1st Street
3. Hope Street and 2nd Place/General Thaddeus Kosciuszko Way
4. Grand Avenue and US-101 Ramps/I-110 Ramps
5. Grand Avenue and Temple Street
6. Grand Avenue and 1st Street
7. Olive Street and 1st Street
8. Olive Street and 4th Street
9. Olive Street and 5th Street
10. Hill Street and 2nd Street
11. Hill Street and 4th Street
12. Hill Street and 3rd Street[1]
13. Broadway and 1st Street

For Option 2, implementing the Downtown ATCS improvement would fully mitigate eleven of the 18 impacted study intersections. For the remaining seven intersections, the signal enhancement would not reduce the impact to a level of insignificance. The intersections that would be partially mitigated after implementation of the Downtown ATCS improvements are:

1. Hope Street and 1st Street
2. Hope Street and 2nd Place/General Thaddeus Kosciuszko Way
3. Grand Avenue and US-101 Ramps/I-110 Ramps
4. Olive Street and 1st Street
5. Olive Street and 4th Street
6. Hill Street and 2nd Street
7. Broadway and 1st Street

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[1] This intersection will be fully mitigated with the improvement discussed in Requirement B.

F. **Hill Street and 3rd Street**

In addition to installing ATCS at this location, it is proposed to restripe the westbound 3rd Street approach at Hill Street to include one left-turn only lane, two through lanes, and one right-turn only lane. To accomplish the restriping the south side of 3rd Street west of Hill Street must be widened by a variable 0 to 3-feet for approximately 60 feet within the existing right-of-way. This improvement measure was proposed without the widening in the draft version of the traffic study and was not accepted by DOT. However, DOT now finds that the improvement measure with the widening modification to be acceptable and along with ATCS to fully mitigate the impact to a level of insignificance.

G. **Construction Impacts**

A construction work site traffic control plan should be submitted to DOT for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. It is recommended that all construction related traffic be restricted to off-peak hours.

H. **Highway Dedication And Street Widening Requirements**

1st Street is classified as a Major Highway Class II which requires a 45-foot half-width roadway on a 57-foot half-width right-of-way to accommodate for installation of dual left turn lanes.

Grand Avenue is also classified as a Modified Major Highway Class II.

Hope Street and Olive Street are classified as Secondary Highways which require a 35-foot half-width roadway on a 45-foot half-width right-of-way. .

General Thaddeus Kosciuszko Way is classified as a Local Street which requires a 20-foot half-width roadway on a 30-foot half- width right-of-way.

DOT's highway dedication and widening requirements are outlined under the "Project frontage Street Improvements", however, the developer must check with the Department of Public Works, BOE Land Development Group to determine the ultimate highway dedication, street widening and sidewalk requirements.

I. **Project Frontage Street Improvements**

Grand Avenue: East side of Grand Avenue shall be widened by 8 feet starting from a point approximately 50 feet north of the new Upper 2nd Street to a point approximately 350 feet north of new Upper 2nd Street to provide for a pick-up/drop-off area along the project frontage. This widening would allow for curbside

passenger loading and unloading, and would also provide for 12-foot wide sidewalk/parkway beyond the new curb alignment.

1st Street: To provide for standard lane widths and accommodate for dual-left-turn lanes for westbound to southbound vehicular traffic at 1st Street/Grand Avenue, LADOT recommends a 7-foot dedication and a 5-foot widening and construction of a 12-foot wide sidewalk along the project frontage to provide a 45-foot half-width roadway on a 57-foot half-width right-of-way. Presently, 1st street is improved to a 40-foot half-width roadway on a 50-foot half-width right-of-way.

J. Improvement and Mitigation Measures Implementation

Unless otherwise specified, the proposed mitigation measures shall be implemented through the BOE B-Permit process. Construction of the improvements to the satisfaction of DOT and BOE must be completed before issuance of any certificate of occupancy. Should any improvement not receive its required approval, the City may substitute an alternative measure of an equivalent or superior effectiveness. Prior to setting the bond amount, BOE shall require that the developer's engineer or contractor contact DOT's B-Permit Coordinator, at (213) 928-9640, to arrange a pre-design meeting to finalize the proposed design needed for the project.

K. Parking Analysis

As noted previously, the traffic study indicated that the project will provide more than 5,000 parking spaces for both land use development options. The developer should check with the Department of Building and Safety on the number of Code required parking spaces needed for the project.

L. Special Events

It is anticipated that, throughout the year, there may be special events associated with the project that could temporarily adversely impact traffic flow throughout the downtown area. The event organizer should coordinate the preparation of a traffic management plan for each event with DOT. The organizer of each event will be responsible for all fees incurred in providing traffic control for that event.

M. Transportation Demand Management (for Option 1 only)

Given the extensive amount of transit services provided for downtown area employees, there is already an inherent incentive for the employees of the project's office component in development Option 1 to search for alternative commute options other than driving alone. The high cost of parking in downtown Los Angeles provides another incentive. There is an opportunity to develop an effective trip reduction program that encourages carpooling, vanpooling, and transit usage.

Reducing the project's trip generation is a viable traffic mitigation option. Therefore, DOT supports the proposal to apply Transportation Demand Management (TDM) measures to the office portion of land use development Option 1.

A TDM program should include the provision of an on-site transportation coordinator, information on transit services, support for carpools and vanpools, priority parking for carpoolers and vanpoolers, and incentives to utilize transit and ridesharing. The traffic study indicated that the significant traffic impact at 1st Street and Hill Street would be mitigated in the p.m. peak hour by reducing project trips through a TDM program in combination with the ATCS improvement.

A preliminary TDM plan, subject to DOT approval, is required prior to the issuance of the first building permit for the office component of project Option 1. A final TDM plan, subject to DOT approval, is required prior to the issuance of the first temporary or final occupancy permit for the office component of the project. The TDM plan shall set the trip reduction milestones needed to fully or partially mitigate any project impacts and shall propose a trip monitoring program that would ensure effective participation and compliance with the TDM goals.

N. Driveway Access

The review of this study does not constitute approval of the driveway access and circulation scheme. Those require separate review and approval and should be coordinated as soon as possible with DOT's Citywide Planning Coordination Section (201 N. Figueroa Street, 4th Floor, Station 3, (213) 482-7024) to avoid delays in the building permit approval process. DOT has worked closely with the developer in determining access and circulation, and has conceptually approved the proposed driveway and circulation plans for the project. All driveways should be Case 2 driveways per BOE standards. All driveways allowing two-way operations should be 30-feet wide, and all one-way driveways should be 18-feet wide.

If you have any questions, please call me at (213) 972-8485 or Wes Pringle of my staff at (213) 972-8482.

Sincerely,

Mike Bagheri
Transportation Engineer

Attachments

CEN06-3022_Grand_Avenue_ProjectFinal.wpd

c: Greg Fischer, Council District No. 9
Martha Stehpenson, Central District, DOT
Verej Janoyan, ATSAC, DOT
Tim Conger, Design Division, DOT
Talmour Tanavoli, Citywide Planning Coordination Section, DOT
Carl Mills, Central District, BOE
Hadar Plafkin, City Planning
Pauline Lewicki, CRA
John S. Edmisten, LA County
The Mobility Group

Table 4-4 **Summary of Project Trip Generation - Project with County Office Building Option** 4/21/2008

A. By Parcel

Project Component	Quantity	Units	A.M Peak Hour			P.M Peak Hour		
			In	Out	Total	In	Out	Total
Parcel Q								
Condominiums	400	D.U	21	89	110	71	44	115
Apartments	100	D.U	4	13	17	12	8	20
Subtotal Residential			25	102	127	83	52	135
Hotel	275	Rooms	59	38	97	58	52	110
Supermarket	53,000	S.F	54	34	88	123	118	241
Retail	87,750	S.F	41	26	67	128	139	267
Restaurant	42,000	S.F	8	8	16	99	49	148
Event Facility	250	Seats	0	0	0	11	3	14
Health Club	50,000	S.F	9	12	21	36	33	69
Subtotal Commercial			112	80	192	397	342	739
Subtotal			198	220	418	538	448	984
Parcel W-1 / W-2								
Condominiums	508	D.U	28	119	147	98	60	158
Apartments	142	D.U	6	18	24	17	11	28
Subtotal Residential			34	137	171	115	70	186
Office	691,000	S.F	585	72	657	91	519	610
Retail	54,400	S.F	25	15	40	74	81	155
Restaurant	10,000	S.F	2	2	4	23	12	35
Subtotal Commercial			612	89	701	188	612	800
Subtotal			646	226	872	303	683	986
Parcel L / M-2								
Condominiums	680	D.U	33	139	172	116	71	187
Apartments	170	D.U	7	22	29	21	13	34
Subtotal Residential			40	161	201	137	84	221
Retail	73,100	S.F	34	22	56	106	114	220
Restaurant	15,000	S.F	3	3	6	36	17	53
Subtotal Commercial			37	25	62	142	131	273
Subtotal			77	186	263	279	215	494
Total All Parcels			919	632	1,551	1,120	1,344	2,464

ATTACHMENT A

Table 4-5 **Summary of Project Trip Generation**
Project with Additional Residential Development Option

4/21/2008

A. By Parcel

Project Component	Quantity	Units	A.M Peak Hour			P.M Peak Hour		
			In	Out	Total	In	Out	Total
Parcel Q								
Condominiums	400	D.U	21	89	110	71	44	115
Apartments	100	D.U	4	13	17	12	8	20
Subtotal Residential			25	102	127	83	52	135
Hotel	275	Rooms	59	38	97	58	52	110
Supermarket	53,000	S.F	54	34	88	123	118	241
Retail	97,750	S.F	41	26	67	128	139	267
Restaurant	42,000	S.F	8	8	16	98	49	148
Event Facility	250	Seats	0	0	0	11	3	14
Health Club	50,000	S.F	9	12	21	36	33	69
Subtotal Commercial			112	80	192	397	342	739
Subtotal			196	220	419	538	445	984
Parcel W-1 / W-2								
Condominiums	1,048	D.U	46	204	252	175	108	283
Apartments	262	D.U	11	33	44	32	20	52
Subtotal Residential			59	237	296	207	128	335
Office	0	S.F	0	0	0	0	0	0
Retail	54,400	S.F	25	15	40	74	81	155
Restaurant	10,000	S.F	2	2	4	23	12	35
Subtotal Commercial			27	17	44	97	93	190
Subtotal			86	254	340	304	221	525
Parcel L / M-2								
Condominiums	680	D.U	33	139	172	116	71	187
Apartments	170	D.U	7	22	29	21	13	34
Subtotal Residential			40	161	201	137	84	221
Retail	73,100	S.F	34	22	56	106	114	220
Restaurant	15,000	S.F	3	3	6	36	17	53
Subtotal Commercial			37	25	62	142	131	273
Subtotal			77	186	263	279	215	494
Total All Parcels			359	660	1,019	1,121	882	2,003

Attachment C

LEVEL OF SERVICE DEFINITIONS FOR SIGNALIZED INTERSECTION[1]

Level of Service	Volume/Capacity Ratio	Definition
A	0.000 - 0.600	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	0.601 - 0.700	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701 - 0.800	GOOD. Occasionally, drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801 - 0.900	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	0.901 - 1.000	POOR. Represents the most vehicles that intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	Greater than 1.000	FAILURE. Backups from nearby intersections or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

SIGNIFICANT TRANSPORTATION IMPACT CRITERIA

1. A transportation impact on an intersection shall be deemed "significant" in accordance with the following table except as otherwise specified in a TSP, ICO or CMP:

SIGNIFICANT TRANSPORTATION IMPACT

Level of Service	Final V/C Ratio	Project-Related Increase In V/C
C	> 0.701 - 0.800	equal to or greater than 0.040
D	> 0.801 - 0.900	equal to or greater than 0.020
E, F	> 0.901	equal to or greater than 0.010

[1]Source: Transportation Research Board, Interim Materials on Highway Capacity, Transportation Research Circular No. 212, January 1980.

Table 5-1 Intersection Level Of Service - Future With Project Conditions - Project with County Office Building Option 4/21/2006

No.	Intersection	A.M Peak						P.M Peak					
		Future Without Project Conditions		Future With Project Conditions		Change in V/C	Significant Impact	Future Without Project Conditions		Future With Project Conditions		Change in V/C	Significant Impact
		V/C	LOS	V/C	LOS			V/C	LOS	V/C	LOS		
1	Figueroa St. / 3rd St.	0.827	D	0.837	D	0.010	No	0.965	E	0.985	E	0.020	Yes
2	Figueroa St. / 5th St.	0.487	A	0.492	A	0.005	No	0.781	C	0.795	C	0.014	No
3	Figueroa St. / 6th St.	0.626	B	0.632	B	0.006	No	0.850	B	0.858	B	0.008	No
4	I-110 Off Ramp / Temple St.	0.398	A	0.400	A	0.002	No	0.409	A	0.413	A	0.004	No
5	Hope St. / Temple St. / US-101 Ramps	0.902	E	0.921	E	0.019	Yes	0.971	E	1.015	F	0.044	Yes
6	Hope St. / 1st St.	0.925	E	0.935	E	0.010	Yes	0.733	C	0.830	D	0.097	Yes
7	Hope St. / GTK Way / 2nd Place	0.420	A	0.452	A	0.032	No	0.776	C	0.845	D	0.069	Yes
8	Flower St. / 3rd St.	0.671	B	0.678	B	0.007	No	0.546	A	0.569	A	0.023	No
9	Flower St. / 5th St.	0.439	A	0.448	A	0.009	No	0.517	A	0.535	A	0.018	No
10	Flower St. / 6th St.	0.528	A	0.540	A	0.012	No	0.498	A	0.515	A	0.017	No
11	Grand Ave. / US-101 Ramps / I-110 Ramps	0.693	B	0.724	C	0.031	No	0.994	E	1.100	F	0.106	Yes
12	Grand Ave. / Temple St.	0.930	E	0.929	E	-0.001	No	0.844	D	0.896	D	0.052	Yes
13	Grand Ave. / 1st St.	0.791	C	0.818	D	0.027	Yes	0.850	D	0.918	E	0.068	Yes
14	Grand Ave. / Upper 2nd St.	0.537	A	0.670	B	0.133	No	0.504	A	0.708	C	0.204	Yes
15	Grand Ave. / 5th St.	0.487	A	0.502	A	0.015	No	0.565	A	0.597	A	0.032	No
16	Olive St. / 1st St.	0.531	A	0.609	B	0.078	No	0.627	B	0.801	D	0.174	Yes
17	Olive St. / 2nd St.	0.283	A	0.359	A	0.076	No	0.406	A	0.583	A	0.177	No
18	Olive St. / 4th St.	0.437	A	0.548	A	0.111	No	0.653	B	0.740	C	0.087	Yes
19	Olive St. / 5th St.	0.623	B	0.654	B	0.031	No	0.812	D	0.858	D	0.046	Yes
20	Olive St. / 6th St.	0.402	A	0.424	A	0.022	No	0.486	A	0.513	A	0.027	No
21	Hill St. / Temple St.	0.762	C	0.815	D	0.053	Yes	0.933	E	0.941	E	0.008	No
22	Hill St. / 1st St.	0.744	C	0.766	C	0.022	No	0.911	E	0.947	E	0.036	Yes
23	Hill St. / 2nd St.	0.765	C	0.793	C	0.028	No	0.679	B	0.845	D	0.166	Yes
24	Hill St. / 3rd St.	0.968	E	0.996	E	0.028	Yes	1.018	F	1.103	F	0.085	Yes
25	Hill St. / 4th St.	0.518	A	0.542	A	0.024	No	0.760	C	0.851	D	0.091	Yes
26	Hill St. / 6th St.	0.457	A	0.466	A	0.009	No	0.586	A	0.609	B	0.023	No
27	Broadway / Temple St.	0.858	D	0.895	D	0.037	Yes	0.834	D	0.866	D	0.032	Yes
28	Broadway / 1st St.	0.824	D	0.915	E	0.091	Yes	0.841	D	0.939	E	0.098	Yes
29	Broadway / 2nd St.	0.613	B	0.616	B	0.003	No	0.748	C	0.768	C	0.020	No
30	Broadway / 4th St.	0.474	A	0.489	A	0.015	No	0.646	B	0.678	B	0.032	No
31	Spring St. / 1st St.	0.592	A	0.609	B	0.017	No	0.582	A	0.622	B	0.040	No
32	Spring St. / 2nd St.	0.609	B	0.612	B	0.003	No	0.509	A	0.517	A	0.008	No

Table 6-1 **Intersection Level Of Service - Future With Project Conditions - Project with Additional Residential Development Option** 4/21/2006

No.	Intersection	A.M Peak						P.M Peak					
		Future Without Project Conditions		Future With Project Conditions		Change in V/C	Significant Impact	Future Without Project Conditions		Future With Project Conditions		Change in V/C	Significant Impact
		V/C	LOS	V/C	LOS			V/C	LOS	V/C	LOS		
1	Figueroa St. / 3rd St.	0.827	D	0.838	D	0.011	No	0.965	E	0.980	E	0.015	Yes
2	Figueroa St. / 5th St.	0.487	A	0.493	A	0.006	No	0.781	C	0.790	C	0.009	No
3	Figueroa St. / 6th St.	0.626	B	0.629	B	0.003	No	0.650	B	0.658	B	0.008	No
4	I-110 Off Ramp / Temple St.	0.398	A	0.400	A	0.002	No	0.409	A	0.412	A	0.003	No
5	Hope St. / Temple St. / US-101 Ramps	0.902	E	0.921	E	0.019	Yes	0.971	E	0.999	E	0.028	Yes
6	Hope St. / 1st St.	0.925	E	0.935	E	0.010	Yes	0.733	C	0.832	D	0.099	Yes
7	Hope St. / GTK Way / 2nd Place	0.420	A	0.452	A	0.032	No	0.776	C	0.845	D	0.069	Yes
8	Flower St. / 3rd St.	0.671	B	0.678	B	0.007	No	0.546	A	0.564	A	0.018	No
9	Flower St. / 5th St.	0.439	A	0.449	A	0.010	No	0.517	A	0.529	A	0.012	No
10	Flower St. / 6th St.	0.528	A	0.535	A	0.007	No	0.498	A	0.513	A	0.015	No
11	Grand Ave. / US-101 Ramps / I-110 Ramps	0.693	B	0.722	C	0.029	No	0.994	E	1.068	F	0.074	Yes
12	Grand Ave. / Temple St.	0.930	E	0.925	E	-0.005	No	0.844	D	0.877	D	0.033	Yes
13	Grand Ave. / 1st St.	0.791	C	0.817	D	0.026	Yes	0.850	D	0.890	D	0.040	Yes
14	Grand Ave. / Upper 2nd St.	0.537	A	0.680	B	0.143	No	0.504	A	0.714	C	0.210	Yes
15	Grand Ave. / 5th St.	0.487	A	0.503	A	0.016	No	0.565	A	0.588	A	0.023	No
16	Olive St. / 1st St.	0.531	A	0.600	A	0.069	No	0.627	B	0.753	C	0.126	Yes
17	Olive St. / 2nd St.	0.283	A	0.386	A	0.103	No	0.406	A	0.599	A	0.193	No
18	Olive St. / 4th St.	0.437	A	0.491	A	0.054	No	0.653	B	0.743	C	0.090	Yes
19	Olive St. / 5th St.	0.623	B	0.661	B	0.038	No	0.812	D	0.851	D	0.039	Yes
20	Olive St. / 6th St.	0.402	A	0.412	A	0.010	No	0.486	A	0.513	A	0.027	No
21	Hill St. / Temple St.	0.782	C	0.811	D	0.049	Yes	0.933	E	0.938	E	0.005	No
22	Hill St. / 1st St.	0.744	C	0.760	C	0.016	No	0.911	E	0.941	E	0.030	Yes
23	Hill St. / 2nd St.	0.765	C	0.792	C	0.027	No	0.879	D	0.803	D	0.124	Yes
24	Hill St. / 3rd St.	0.968	E	0.986	E	0.018	Yes	1.018	F	1.050	F	0.032	Yes
25	Hill St. / 4th St.	0.518	A	0.543	A	0.025	No	0.760	C	0.802	D	0.042	Yes
26	Hill St. / 6th St.	0.457	A	0.467	A	0.010	No	0.586	A	0.603	B	0.017	No
27	Broadway / Temple St.	0.858	D	0.867	D	0.009	No	0.834	D	0.866	D	0.032	Yes
28	Broadway / 1st St.	0.824	D	0.863	D	0.039	Yes	0.841	D	0.918	E	0.077	Yes
29	Broadway / 2nd St.	0.613	B	0.617	B	0.004	No	0.748	C	0.767	C	0.019	No
30	Broadway / 4th St.	0.474	A	0.490	A	0.016	No	0.646	B	0.667	B	0.021	No
31	Spring St. / 1st St.	0.592	A	0.610	B	0.018	No	0.582	A	0.611	B	0.029	No
32	Spring St. / 2nd St.	0.609	B	0.612	B	0.003	No	0.509	A	0.518	A	0.009	No

ATTACHMENT F

The proposal to construct a proportionate share of the Downtown ATCS System and fund a proportionate share of the ATCS software integration cost to mitigate the impact at the intersections below is acceptable to DOT.

1. Figueroa Street and 3rd Street
2. Hope Street/US-101 Ramps and Temple Street
3. Hope Street and 1st Street
4. Hope Street and 2nd Place/General Thaddeus Kosciuszko Way
5. Grand Avenue and US-101 Ramps/I-110 Ramps
6. Grand Avenue and Temple Street
7. Grand Avenue and 1st Street
8. Grand Avenue Upper 2nd Street
9. Olive Street and 1st Street
10. Olive Street and 4th Street
11. Olive Street and 5th Street
12. Hill Street and Temple Street
13. Hill Street and 1st Street
14. Hill Street and 2nd Street
15. Hill Street and 3rd Street
16. Hill Street and 4th Street
17. Broadway and Temple Street
18. Broadway and 1st Street

The applicable proportionate share of the subsystem, identified as Downtown, to mitigate the intersections listed above has been defined loosely as the area bounded by Cesar Chavez Avenue to the north, 6th Street to the south, Figueroa Street to the west and Broadway to the east. To implement this project mitigation measure, the following steps are required:

A. Prior to the issuance of any building permits, the applicant shall guarantee the implementation of the proportionate share of the Downtown ATCS subsystem by posting a B-Permit Bond to the satisfaction of the Department of Public Works, Bureau of Engineering and LADOT to implement the improvements listed below; and shall make a cash deposit of $15,000 to LADOT for the ATCS subsystem software integration cost.

B. The following locations require an upgrade of the existing 170 traffic signal controller to a **Model 2070 traffic signal controller**:

1. North Spring Street between Cesar Chavez Avenue and Arcadia Street
2. Hill Street and Temple Street
3. Hope Street, Harbor Freeway Ramps, and Hollywood Freeway Ramps
4. Temple Street and Figueroa Street
5. Temple Street and Beaudry Avenue
6. Spring Street between Temple Street and 1st Street
7. Hill Street between 1st Street and Temple Street

8. Hope Street between 1st Street and Temple Street
9. 1st Street and Hill Street
10. 2nd Street and Spring Street
11. 2nd Street and Hill Street
12. 2nd Street and Beaudry Avenue
13. 2nd Street and (Upper) Hope Street
14. 2nd Place and Flower Street
15. General Thaddeus Koscluszko Way and (Lower) Grand Avenue
16. 3rd Street and Spring Street
17. 3rd Street and Hill Street
18. 3rd Street and Flower Street
19. 3rd Street and Figueroa Street
20. 3rd Street and Beaudry Avenue
21. Beaudry Avenue and Harbor Freeway S/B Off-Ramp (S/O 2nd Street)
22. 3rd Street and Hope Street
23. Hope Street between 3rd Street and 4th Street Ramps
24. Spring Street between 3rd Street and 4th Street
25. Hill Street between 3rd Street and 4th Street
26. 4th Street and Spring Street
27. 4th Street and Hill Street
28. 4th Street and (Lower) Grand Avenue
29. 4th Street and Hope Street
30. 4th Street and Flower Street
31. 4th Street and Beaudry Avenue
32. Spring Street between 4th Street and 5th Street
33. Hill Street between 4th Street and 5th Street
34. Spring Street between 5th Street and 6th Street
35. Hill Street between 5th Street and 6th Street

C. At the following locations the installation of **CCTV Cameras** are being requested:

1. 1st Street and Beaudry Avenue
2. 1st Street and Grand Avenue
3. 2nd Street and Spring Street
4. 3rd Street and Figueroa Street
5. 4th Street and Broadway
6. 5th Street and Figueroa Street
7. 5th Street and Grand Avenue (on US Bank Tower Building)
8. 6th Street and Flower Street

Please note the CCTV installation will include all necessary communication systems for video images to be displayed at the ATSAC Center.

D. At the following locations the installation of **ATSAC/ATCS System Detectors** are being requested:

2nd Street and Broadway
2 W/B System Detectors
2 N/B System Detectors

2 E/B System Detectors
2 S/B System Detectors

2nd Street and Olive Street
2 W/B System Detectors
2 S/B System Detectors
2 N/B System Detectors

General Thaddeus Kosciuszko Way and Olive Street
2 E/B System Detectors
2 N/B System Detectors
2 S/B System Detectors

3rd Street and Hope Street
2 W/B System Detectors
2 N/B System Detectors
2 S/B System Detectors

3rd Street and Grand Avenue
2 E/B System Detectors
2 N/B System Detectors
2 S/B System Detectors

4th Street and Flower Street
2 E/B System Detectors
3 S/B System Detectors

4th Street and Hope Street
2 N/B System Detectors
2 S/B System Detectors
3 E/B System Detectors

4th Street and Figueroa Street
7 N/B System Detectors

Beaudry Avenue and the Harbor Fwy S/B Off-Ramp (S/O 2nd Street)
2 N/B System Detectors
2 S/B System Detectors
1 W/B System Detectors

E. At the following locations the installation of **Protected-Permissive Left-Turn Phasing** is being requested:

1st Street and Grand Avenue
N/B Left-Turn
S/B Left-Turn

Beaudry Avenue and Sunset Boulevard
N/B Left-Turn

Cesar Chavez Avenue, Figueroa Street, and Sunset Boulevard
N/B Left-Turn

F. At the following location the modification of **Roadway Geometric Striping** is being requested:

Beaudry Avenue between Sunset Boulevard and Temple Street
Re-striping with the installation of a N/B Left-Turn lane

TOTAL INSTALLATIONS:
35 Model 2070 Traffic Signal Controllers
58 System Detectors
8 CCTV Cameras
4 (directions) Protected-Permissive Left-Turn Phasing
2 arterial requiring geometric re-striping

G. Prior to the issuance of any certificate of occupancy permits, the applicant shall, through the City's B-Permit process, construct, and connect all necessary ATSAC/ATCS equipment, ATCS equipment, ATCS detector loops, and CCTV equipment required for the proportionate share of the Downtown subsystem. Prior to commencing the B-Permit design work, the applicant should contact the LADOT Signal Design Section at (213) 928-9640 for detailed design instructions