

DEPARTMENT OF  
CITY PLANNING  
CITY PLANNING COMMISSION  
DAVID H. J. AMBROZ  
PRESIDENT  
RENEE DAKE WILSON  
VICE-PRESIDENT  
ROBERT L. AHN  
CAROLINE CHOE  
RICHARD KATZ  
JOHN W. MACK  
SAMANTHA MILLMAN  
VERONICA PADILLA  
DANA M. PERLMAN  
JAMES K. WILLIAMS  
COMMISSION EXECUTIVE ASSISTANT  
(213) 978-1300

CITY OF LOS ANGELES  
CALIFORNIA



ERIC GARCETTI  
MAYOR

EXECUTIVE OFFICES  
200 N. SPRING STREET, ROOM 525  
LOS ANGELES, CA 90012-4801

VINCENT P. BERTONI, AICP  
DIRECTOR  
(213) 978-1271  
LISA M. WEBBER, AICP  
DEPUTY DIRECTOR  
(213) 978-1274  
JAN ZATORSKI  
DEPUTY DIRECTOR  
(213) 978-1273

FAX: (213) 978-1275

INFORMATION  
<http://planning.lacity.org>

March 14, 2016

Councilmember Jose Huizar, Chair  
Councilmember Marqueece Harris-Dawson, Vice Chair  
Councilmember Mitchell Englander  
Councilmember Gilbert A. Cedillo  
Councilmember Felipe Fuentes  
Planning and Land Use Management Committee  
Los Angeles City Hall  
200 N. Spring Street  
Los Angeles, CA 90012

**Re: City Planning Case Nos.: CPC-2014-3808-GPA-ZC-HD-CU-CUB-ZAI-SPR**

**Project Address:** 6201-6229 West Sunset Boulevard; 1510-1520 North Argyle Avenue; 6210 West Selma Avenue; 1534-1541 North El Centro Avenue

On December 10, 2015, the City Planning Commission approved CPC-2014-3808-GPA-ZC-HD-CU-CUB-ZAI-SPR, and granted in part/denied in part the appeal of Vesting Tentative Tract Map No. 72213, both associated with the mixed-use development of 731 residential dwelling units, 24,000 square feet of retail/restaurant uses, as well as the maintenance and preservation of the Palladium venue.

Upon further review of the City Planning Commission actions, Planning staff respectfully requests that the following corrections to typographical errors be made, as well as additional language be provided to the approval conditions, to provide more clarity as to the intent of the actions of the City Planning Commission.

Additionally, Planning staff recommends replacing the approved Exhibit "A" stamp-dated December 10, 2015, with a new Exhibit "A", stamp-dated March 15, 2016, to address typos and show setbacks modified during the appeal process.

**CORRECTIONS/CLARIFICATIONS CPC-2014-3808-GPA-ZC-HD-CU-CUB-ZAI-SPR**

**CONDITIONS FOR EFFECTUATING A TENTATIVE  
(T) CLASSIFICATION REMOVAL**

*Page T-3*

**T-Condition No. 3**

3. **Building & Safety – Zoning.** Prior to recordation of the final map, the Department of Building and Safety, Zoning Division shall certify that no Building or Zoning Code violations exist on the subject site. In addition, the following items shall be satisfied:
  - a. Show compliance with the [Q] and [D] conditions of Ordinance 165,662 as applicable or provide a copy of the Zone and Height District Change approval

~~Department of City Planning approval to amend amending the [Q] and D conditions is required regarding to permit the allowable FAR and the allowable residential uses on the site. Proposed project does not meet the density and FAR required per the above ordinance 165,662. City Planning approval to be consistent with the Regional Center Commercial requirements.~~

- b. **Provide a copy of the General Plan Amendment approval as enacted** ~~Obtain City Planning approval to designate the entire project site as Regional Center Commercial.~~
- c. Provide a copy of the Zone Change approval. Zone Change must be enacted and effective prior to obtaining Zoning clearance.
- d. ~~Obtain Conditional Use Permit approval to allow proposed hotel in C4 Zone within 500 ft. of residential zone.~~
- e. Provide a copy of CPC case CPC-2014-3808-GPA-ZC-HD-CU-CUB-ZAI-SPR and CPC-2014-669-CPU. Show compliance with all the conditions/requirements of the CPC cases as applicable.
- f. Show all street dedication(s) as required by Bureau of Engineering **these conditions** and provide net lot area after all dedication. "Area" requirements shall be re-checked as per net lot area after street dedication(s). Front and side yard requirements shall be required to comply with current code as measured from new property lines after dedication( s ).
- g. Record a Covenant and Agreement, such as a Covenant and Agreement Regarding Maintenance of Building, to treat the buildings and structures located in an Air Space Subdivision as if they were within a single lot.

### (Q) QUALIFIED CONDITIONS OF APPROVAL

Page Q-1

#### A. **Entitlement Conditions**

- 1. **Site Development.** Except as modified herein, the project shall be in substantial conformance with the plans and materials stamped "Exhibit A" and dated March 15, 2016, and attached to the subject case file. No change to the plans will be made without prior review by the Department of City Planning, and written approval by the Director of Planning, with each change being identified and justified in writing. Minor deviations may be allowed in order to comply with provisions of the Municipal Code, the subject conditions, and the intent of the subject permit authorization.
- 3. **Density.** Development of the project site shall be limited to the development of 731 residential dwelling units, of which 5% (37 units) shall be set aside for households earning 50-120% AMI, and 24,000 square feet of retail and restaurant uses (identified as Option 1 in the EIR).
  - a. **Housing and Community Investment Department.** Prior to the issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing and Community Investment Department (HCIDLA) to make a minimum of 5 percent (37 units) of the 731 residential units within development available for households earning 50-120% AMI, for sale or rental as determined to be affordable to such households by requirements established by HCIDLA, for a period of at least 55 years. The project shall comply with any monitoring

requirements established by HCIDLA as set forth in the covenant, including but not limited to any necessary payment of fees in order to draft and monitor the covenant, as well as any applicable annual monitoring costs at a per unit rate as determined by HCIDLA, for the full term of the covenant. Enforcement of the terms of said covenant shall be the responsibility of HCIDLA. The applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file.

Page Q-2

**Condition No. Q.A-7**

**A. Entitlement Conditions**

**7. Vehicular Parking.**

- a. Palladium: The project shall provide a minimum of 317 replacement parking spaces to serve the existing Palladium.
- b. Residential/Retail: The project shall provide parking calculated in accordance with the provisions of the Municipal Code. However, in the event the applicant should develop the project as condominiums, the project shall provide parking in accordance with the Advisory Agency's parking policy for condominiums.

Page Q-2

**Condition No. Q-9**

9. Palladium. In the event that a project is approved for the property immediately adjoining the Hollywood Palladium theater, located at 6201 Sunset Boulevard, ~~at a density of 6.0:1 FAR, and provided that all administrative and legal appeals and challenges have been resolved permitting a project with an intensity of 6.0:1 FAR,~~ then prior to the issuance of building permits for such project, the applicant shall nominate the Hollywood Palladium theater building as a Historic-Cultural Monument in accordance with the Los Angeles Cultural Heritage Ordinance, Municipal Code Sections 22.171 et seq.

Pages Q-5 through Q-26

**Condition No. Q-21**

**MITIGATIONS MEASURES AND PROJECT DESIGN FEATURES**

*(Update Mitigations to reflect removal of Option 2 (Hotel), and Errata Nos. 1 & 2 of EIR)*

**MM-AQ-1:** The Applicant shall implement the following measures to reduce the emissions of air pollutants generated by heavy-duty diesel-powered equipment operating at the Project Site:

- The most current grade of ultra-low sulfur diesel (ULSD) fuel approved by CARB and available in the South Coast Air Basin shall be used for all heavy-duty diesel-powered equipment operating and/or refueling at the Project Site
- Truck and equipment idling and queuing time shall be limited to five minutes or less, when equipment is not in active use, in accordance with the CARB Airborne Toxic Control Measure;
- The use of the electricity infrastructure surrounding the construction sites shall be used wherever available and possible rather than electrical generators powered by internal combustion engines;



- Utilize construction equipment having the minimum practical engine size (i.e., lowest appropriate horsepower rating for the intended job);
- All construction equipment operating on-site shall be properly maintained (including engine tuning) at all times in accordance with manufacturers' specifications and schedules;
- Tampering with construction equipment to increase horsepower or to defeat emission control devices shall be prohibited;
- The use of all construction equipment shall be suspended during a second-stage smog alert in the immediate vicinity of the Project Site.

**Enforcement Agency:** SCAQMD; Los Angeles Department of Building and Safety

**Monitoring Agency:** Los Angeles Department of Building and Safety

**Monitoring Phase:** Construction

**Monitoring Frequency:** Periodic field inspections during construction

**Action Indicating Compliance:** Field inspection sign-off; Compliance certification report by Project contractor

**MM-ARCH-1:** The Applicant shall retain a qualified archaeological monitor who meets the Secretary of the Interior's Professional Qualifications Standards for an archaeologist who shall be present during construction excavations such as grading, trenching, grubbing, or any other construction excavation activity associated with the Project. The frequency of monitoring shall be determined by the archaeological monitor based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus fill soils), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. Prior to the onset of construction activities an Archaeological Resource Mitigation Plan (ARMP) shall be prepared. The ARMP shall include protocols for implementation of the Archaeological Mitigation Measures; and shall also require implementation of a pre-construction testing program with a sampling of soil testing at representative test trenches.

**Enforcement Agency:** Los Angeles Department of City Planning

**Monitoring Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety

**Monitoring Phase:** Construction

**Monitoring Frequency:** Periodic per recommendations of archaeological monitor

**Action Indicating Compliance:** Compliance report by qualified archaeological monitor.

**MM-ARCH-2:** In the event that archaeological resources are unearthed during ground-disturbing activities, the archaeological monitor shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of the find so that the find can be evaluated. Work shall be allowed to continue outside of the vicinity of the find. All archaeological resources unearthed by Project construction activities shall be evaluated by the archaeologist. The Applicant shall coordinate with the archaeologist and the City to develop an appropriate treatment plan for the resources if they are determined to be potentially eligible for the California Register or potentially qualify as unique archaeological resources pursuant to CEQA. Treatment may include implementation of archaeological data recovery excavations to remove the resource or preservation in place.



**Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety

**Monitoring Agency:** Los Angeles Department of Building and Safety

**Monitoring Phase:** Construction

**Monitoring Frequency:** At time of resource discovery, should it occur

**Action Indicating Compliance:** If archaeological resources are unearthed, submittal of compliance certification report and treatment plan by a qualified archaeological monitor

**MM-ARCH-3:** The archaeological monitor shall prepare a final report at the conclusion of archaeological monitoring. The report shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures. The report shall include a description of resources unearthed, if any, treatment of the resources, and evaluation of the resources with respect to the California Register. The Applicant, in consultation with the archaeologist and the City shall designate repositories meeting State standards in the event that archaeological material is recovered. Project material shall be curated in accordance with the State Historical Resources Commission's Guidelines for Curation of Archaeological Collections.

**Enforcement Agency:** Los Angeles Department of City Planning

**Monitoring Agency:** Los Angeles Department of City Planning

**Monitoring Phase:** Post-construction

**Monitoring Frequency:** Once upon completion of excavation

**Action Indicating Compliance:** Compliance report by qualified archaeological monitor.

**MM-ARCH-4:** If human remains are encountered unexpectedly during implementation of the Project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the Applicant, inspect the site of the discovery of the Native American remains and may recommend means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the Applicant to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the Applicant shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the Applicant has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The Applicant shall discuss all reasonable options with the descendants regarding the descendants' preferences for treatment.

Whenever the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the Applicant or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of

PRC Section 5097.94, if invoked, fails to provide measures acceptable to the Applicant, the Applicant or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

**Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety

**Monitoring Agency:** Los Angeles Department of Building and Safety

**Monitoring Phase:** Construction

**Monitoring Frequency:** Ongoing through grading and excavation

**Action Indicating Compliance:** If human remains are encountered unexpectedly, submittal of written evidence to the Los Angeles Department of City Planning of compliance with State Health and Safety Code Section 7050.0 and Public Resources Code Section 5097.98

**MM-PALEO-1:** A qualified Paleontologist shall attend a pre-grade meeting and develop a paleontological monitoring program for excavations into older Quaternary Alluvium deposits. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The qualified Paleontologist shall supervise a paleontological monitor who shall be present during construction excavations into older Quaternary Alluvium deposits. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered.

**Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety

**Monitoring Agency:** Los Angeles Department of Building and Safety

**Monitoring Phase:** Pre-Construction, Construction

**Monitoring Frequency:** Once prior to issuance of building permits for program approval; Periodic during excavation

**Action Indicating Compliance:** Issuance of grading permit and development of paleontological resources monitoring program; Compliance report by qualified paleontologist

**MM-PALEO-2:** If a potential fossil is found, the Paleontological Monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage. At the Paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing.

**Enforcement Agency:** Los Angeles Department of Building and Safety; Los Angeles Department of Building and Safety

**Monitoring Agency:** Los Angeles Department of Building and Safety

**Monitoring Phase:** Construction

**Monitoring Frequency:** At time of resource discovery, should it occur

**Action Indicating Compliance:** If no unanticipated discoveries are found and grading occurs within the older Quaternary Alluvium, compliance certification report by qualified

paleontologist; if unanticipated discoveries are found, submittal of a report and mitigation plan(s) by a qualified paleontologist.

**MM-PALEO-3:** Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository. Any fossils collected shall be donated to a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County. Accompanying notes, maps, and photographs shall also be filed at the repository.

**Enforcement Agency:** Los Angeles Department of City Planning  
**Monitoring Agency:** Los Angeles Department of City Planning;  
**Monitoring Phase:** Construction  
**Monitoring Frequency:** At time of resource recovery, should resources be discovered

**Action Indicating Compliance:** If no unanticipated discoveries are found and grading occurs within the older Quaternary Alluvium, compliance certification report by qualified paleontologist; if unanticipated discoveries are found, submittal of a report by a qualified paleontologist.

**MM-PALEO-4:** Following the completion of the above measures, the Paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Project Applicant to the lead agency, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

**Enforcement Agency:** Los Angeles Department of City Planning  
**Monitoring Agency:** Los Angeles Department of City Planning  
**Monitoring Phase:** Construction  
**Monitoring Frequency:** Once upon the completion of excavation

**Action Indicating Compliance:** If no unanticipated discoveries are found and grading occurs within the older Quaternary Alluvium, compliance certification report by qualified paleontologist; if unanticipated discoveries are found, submittal of a by a qualified paleontologist

**PDF-HIST-1:** Palladium Preservation and Enhancement Plan. The Applicant shall contribute to the preservation and enhancement of the Palladium through improvements to be selected at the Applicant's election, including from the following list of potential improvements, provided that the proposed improvement to be implemented must be (1) selected by the Applicant as a priority improvement and approved by its tenant for the Palladium, (2) approved by the Department of City Planning's Office of Historic Resources ("OHR") and (3) in compliance with the Secretary of the Interior's Standards for Rehabilitation, as certified by a qualified historic preservation consultant who shall monitor work under the Palladium Preservation and Enhancement Plan for conformance with the Standards.

A. Timing. A draft Palladium Preservation and Enhancement Plan proposed by the Applicant shall be submitted to Hollywood Heritage and OHR no later than 30 calendar days prior to any design review required from same and prior to the issuance of building permits for the Project, and~~which will include identification~~



of character-defining features and the significance of such features. A final Plan shall be approved by OHR prior to issuance of final certificates of occupancy for the Project. At the Applicant's option, earlier review by OHR may be requested such as during schematic design and design development. An Historic Structure Report shall also be prepared in conjunction with the final Preservation and Enhancement Plan.

B. Potential Elements for Inclusion. The following includes a list of proposed potential improvements to be considered for inclusion in the Palladium Preservation and Enhancement Plan. This list is based, in part, on surveys of the Palladium conducted by Historic Resources Group, which prepared the Project's Historic Resources Assessment Report and conducted a prior historic review of the Palladium in conjunction with the Palladium's 2008 rehabilitation. This list is also based on improvements recommended in comment letters on the Draft EIR, as well as needed functional improvements to the Palladium's operations, to ensure that it remains a first-class entertainment venue. Prior to construction of any improvements, the Applicant shall propose those improvements it determines to be priority improvements and seek to obtain the approvals referenced in items 1, 2 and 3 of the first paragraph above.

- Visually enhance the blank eastern wall of the Palladium with temporary and reversible images, potentially through a "Memory Lane" that exhibits historic images and posters of Palladium events and historic moments;
- Improve the Palladium's existing back-stage space, back-of-house service, and loading operations, which do not meet current performance and production needs - replace the 2008 addition on the northern side of the Palladium, and potentially the previously altered, original extension in the same location, with subterranean and/or overhead bridge connections to the new building on the north side. Additionally, relocate the existing outdoor truck loading area to a subterranean level, with subterranean access from Argyle and Selma Avenues. These enhancements would provide additional staging areas for the Palladium's operations within the new building; improve loading operations; eliminate any potential pedestrian-vehicular conflicts on El Centro Avenue; and provide substantially more open space on the rear side of the Palladium for walking and gathering;
- Improve accessibility to, and utilization of, the Palladium's existing southern storefront spaces, better integrate the storefront spaces with the proposed Project, and improve queuing – provide doors and potential window openings within the Palladium's western wall to connect pedestrians from Sunset Court to the Palladium's storefronts;
- Prepare a design program for the Palladium's existing southern storefront spaces. The nonstructural storefront partitions on the southern façade of the Palladium building were altered prior to the Palladium's 2008 rehabilitation project, and were not uniform or character-defining. The 2008 rehabilitation funded by the CRA removed non-character-defining features, reconstructed missing original features, and built new features such as storefronts that are compatible with the historic building. Similar to the intent and implementation of the 2008 rehabilitation, a design program for these storefronts will include a uniform set of components that provide for a coherent design among the different storefront bays while allowing for layout options that meet the needs of tenants, for instance allowing

alterations of the locations and numbers of doors, windows, and mullions;

- Prepare a historically compatible signage plan for the Palladium's existing southern storefront spaces, potentially including such elements as sign dimensions and options for materials, construction, illumination, colors, and finishes. Historically there have been many different styles and types of tenant signage used on the building, and consideration will be given to historic signage design precedents that are documented in archival photographs of the Palladium when designing new signage for the storefronts. However signage may or may not be needed for the existing storefront spaces;
- Flush opaque entrance lobby doors on Sunset and Argyle - Replace with fully glazed doors that recall original design documented in the original Gordon Kaufmann drawings;
- Ballroom ceiling - Repair and replace textured acoustical plaster as needed;
- Ballroom floor - Stripping, screening, varnishing, and waxing on a 10 year cycle;
- Lobby finish, lighting, and restoration - Install compatible sconces, wall covering, and carpet;
- Public toilets – Remove and reinstall clean, durable multiple-accommodation facilities;
- Ballroom chandeliers - Dust and wash glass; reduce corrosion and wax metal on a 10 year cycle;
- Wood roof framing - Annual inspection and local treatment by licensed exterminator
- Metal flashings, fasciae, hardware - Maintenance of finishes and operating parts on a 10 year cycle;
- Exterior Walls - Maintenance of painted surfaces on a 10 year cycle;
- Neon and specialty signage and lighting - Maintenance of ballasts, tubes, boxes, shields, faces on a 10 year cycle;
- HVAC system - Engineering and replacement of major components on a 15 year cycle;
- Roof - Replacement on a 20 year cycle;
- Toilet fixtures, fittings, & accessories - Replacement of heavy use toilet components on a 10 year cycle;

<b>Enforcement Agency:</b>	Los Angeles Department of City Planning, Office of Historic Resources
<b>Monitoring Agency:</b>	Los Angeles Department of City Planning, Office of Historic Resources
<b>Monitoring Phase:</b>	Pre Construction, Construction, Operations
<b>Monitoring Frequency:</b>	Submittal of draft Plan prior to issuance of building permits; approval of final Plan by OHR prior to issuance of final certificates of occupancy; periodic thereafter based on Plan details

**Action Indicating Compliance:** Approval of Plan by OHR; Compliance report by historic consultant/monitor

**PDF-HIST-2:** Historic Interpretive Exhibit. An Historic Interpretive Exhibit shall be incorporated into the Project at key locations to increase general public and patron awareness and appreciation of the history and significance of Hollywood and the Hollywood Palladium. The exhibit shall provide informative visual displays and/or media that may address such topics as: the building's architectural style and architect; identification of other historical buildings in the Project vicinity and their relationship to the Palladium; use of the Project Site prior to construction of the Palladium and the historic Hollywood context; and the layers of history at the site: agriculture, motion picture industry, musical recording, live entertainment, radio, and television. The display shall be designed and implemented pursuant to input from Hollywood stakeholders. The Historic Interpretive Exhibit may be located within the Palladium building itself, or as an outdoor interpretive program reviewed and approved by the Office of Historic Resources. The Historic Interpretive Exhibit will not be housed in separate new construction appended to the exterior of the Palladium building.

**Enforcement Agency:** Los Angeles Department of City Planning  
**Monitoring Agency:** Los Angeles Department of City Planning  
**Monitoring Phase:** Construction, Operations  
**Monitoring Frequency:** Once during construction for consistency with the PDF;  
Once during operations

**Action Indicating Compliance:** Compliance report by Applicant

**MM-GS-1:** Prior to issuance of a grading permit, a qualified geotechnical engineer shall prepare and submit to the Department of Building and Safety a final geotechnical report that provides recommendations for seismic safety and design requirements for foundations, retaining walls/shoring and excavation to meet applicable State and City regulatory requirements. A qualified geotechnical engineer shall be retained by the Applicant to be present on the Project Site during excavation, grading, and general site preparation activities to monitor the implementation of the recommendations specified in the Geology and Soils Report, final geotechnical report, and any other subsequent Geology and Soils Reports prepared for the Project, subject to City review and approval. When and if needed, the geotechnical engineer shall provide structure-specific geologic and geotechnical recommendations which shall be documented in a report to be approved by the City and appended to the Project's previous Geology and Soils Reports.

**Enforcement Agency:** Los Angeles Department of Building and Safety  
**Monitoring Agency:** Los Angeles Department of Building and Safety  
**Monitoring Phase:** Pre-Construction and Construction  
**Monitoring Frequency:** Once, prior to issuance of grading permit; Periodic field inspections during construction

**Action Indicating Compliance:** Issuance of grading permits; Field inspection sign-off; Geotechnical Engineers site visit reports as needed

**PDF-GHG-1:** Construction Measures: The Project shall utilize off-road diesel-powered construction equipment that meet or exceed the CARB and USEPA ~~Tier 3~~ Tier 4 off-road emissions standards for these equipment rated at 50 hp or greater during the grading, concrete pouring and building construction phases of Project construction. Pole power (electricity delivered from the utility grid) shall be the primary source of power for use with on-site electric tools, equipment, lighting, etc., except where/when infeasible due to site constraints; diesel generators, if needed, shall be rated between 75 horsepower (hp)



and 750 hp and meet or exceed applicable Tier 4 standards. Total diesel generator usage during construction shall not exceed 312,000 horsepower-hours. Cranes and concrete pumps shall be electrified with pole power. The Project shall utilize on-road haul trucks that meet or exceed the model year 2010 emission standards. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.

**Enforcement Agency:** SCAQMD; Los Angeles Department of Building and Safety

**Monitoring Agency:** Los Angeles Department of Building and Safety

**Monitoring Phase:** Construction

**Monitoring Frequency:** Periodic field inspections during construction

**Action Indicating Compliance:** Field inspection sign-off

**PDF-GHG-2: Green Building Measures:** The Project shall be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code and meet the standards of the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design® (LEED®) Silver Certification level or its equivalent. Green building measures would include but are not limited to the following:

- The Project would implement a construction waste management plan to recycle and/or salvage a minimum of 70 percent of nonhazardous construction debris or minimize the generation of construction waste to 2.5 pounds per square foot of building floor area. (LEED® Materials and Resources Credit 5 [v4]);
- Trees and other landscaping (approximately 53,600 square feet or 35 percent of the Site area) would provide shading and capture carbon dioxide emissions;
- Roof-top Terraces would include approximately 37,300 square feet of landscaped area. The remaining roof-top areas would use high-albedo/reflective roofs such as light-colored, build-up "white" roofs to reduce energy loads and the urban heat-island effect;
- The Project would be designed to optimize energy performance and reduce building energy cost by 10 percent for new construction compared to the Title 24 Building Standards Code. (LEED® Energy and Atmosphere Credit 2 [v4]);
- The Project would be designed to optimize energy performance and reduce building energy cost by installing energy efficient appliances that meet the USEPA ENERGY STAR rating standards or equivalent;
- The Project would include double-paned windows to keep heat out during summer months and keep heat inside during winter months;
- The Project would include lighting controls with occupancy sensors to take advantage of available natural light;
- The parking structure would be designed with occupancy-sensor controlled lighting that would place lighting fixtures in a low power state in unoccupied zones. A demonstration project by the United States Department of Energy indicated that the use of occupancy-

sensor controlled lighting achieved a reduction of 50 percent or more in lighting energy use compared to a similarly lighted parking structure without occupancy-sensor controls. For the purposes of this assessment, compliance with this feature is assumed to achieve a minimum 50 percent reduction in the energy required for parking structure lighting;

- The Project would reduce overall potable water use by a minimum of 30 percent compared to baseline water consumption as defined by LEED® Water Efficiency Prerequisite 2 [v4] by installing water fixtures that exceed applicable standards, weather-based irrigation controllers, drip/subsurface irrigation, use of drought tolerant/California native plants, and collection of stormwater for use in landscaping. (LEED® Water Efficiency Credit 2 [v4]);
- The Project would provide on-site recycling areas, consistent with City of Los Angeles strategies and ordinances, with the goal of achieving 70 percent waste diversion by 2020, and 90 percent by 2025;
- The Project would utilize low VOC paint during building construction for all residential and non-residential interior coating;

**Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety

**Monitoring Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety

**Monitoring Phase:** Pre-construction; Operation

**Monitoring Frequency:** Once at plan check prior to issuance of building permit;  
Once after operation

**Action Indicating Compliance:** Issuance of Building Permit (Pre-construction);  
Compliance certification report (Operation)

**MM-HAZ-1:** Prior to issuance of a building permit, the Applicant shall investigate the purpose of the on-site groundwater monitoring wells to determine whether they are still necessary. If it is determined that the wells are not associated with any ongoing investigation, they shall be properly abandoned in accordance with applicable regulations and guidelines. In addition, the USTs shall be removed pursuant to the previous LAFD review and closure letter.

**Enforcement Agency:** Los Angeles Department of Building and Safety; LAFD; RWQCB

**Monitoring Agency:** Los Angeles Department of Building and Safety; LAFD

**Monitoring Phase:** Pre-construction; Construction

**Monitoring Frequency:** Once at onset of building activities

**Action Indicating Compliance:** Compliance report

**MM-HAZ-2:** Prior to enhancement activities involving any alterations to the Palladium in areas where asbestos could be found, the Applicant shall submit verification to the City of Los Angeles Department of Building and Safety that an asbestos survey for the proposed area of alteration has been conducted. If asbestos is found, the Applicant shall follow all procedural requirements and regulations of the SCAQMD Rule 1403.

**Enforcement Agency:** Los Angeles Department of Building and Safety; SCAQMD

**Monitoring Agency:** Los Angeles Department of Building and Safety  
**Monitoring Phase:** Pre- Construction; Construction if asbestos if found  
**Monitoring Frequency:** Once prior to Palladium building alterations; on-going during alterations if asbestos is found  
**Action Indicating Compliance:** Compliance report by Project contractor

**MM-HAZ-3:** Prior to enhancement activities involving any alterations to the Palladium, the Applicant shall submit verification to the City of Los Angeles Department of Building and Safety that a lead-based paint survey for the proposed area of alteration has been conducted. If lead-based paint is found for the proposed area of alteration, the Applicant shall follow all procedural requirements and regulations for its proper removal and disposal.

**Enforcement Agency:** Los Angeles Department of Public Works; CalEPA  
**Monitoring Agency:** Los Angeles Department of Public Works  
**Monitoring Phase:** Pre-construction; Construction if lead based paint is present  
**Monitoring Frequency:** Once prior to Palladium building alterations; on-going during alterations if lead-based paint is found  
**Action Indicating Compliance:** Compliance report by Project contractor

**MM-HAZ-4:** Fluorescent light ballast and other product labels for existing building features that might be altered during restoration activities for the Palladium shall be inspected prior to demolition. If the labels do not include the statement "No PCBs", the product(s) shall be properly removed by a licensed PCB removal contractor and disposed of as PCB-containing waste prior to demolition.

**Enforcement Agency:** Los Angeles Department of Building and Safety; CalEPA  
**Monitoring Agency:** Los Angeles Department of Building and Safety  
**Monitoring Phase:** Construction  
**Monitoring Frequency:** Periodic field inspections during alteration activities  
**Action Indicating Compliance:** Compliance report by Project contractor

**PDF-Land Use-1:** Prior to the issuance of a building permit for above grade construction for the Project, the Applicant shall either (1) record a covenant to tie the Project Site's two lots; or (2) record a phase of an approved tract map for the Project which merges the Site's two lots into one master ground lot.

**Enforcement Agency:** Los Angeles Department of City Planning  
**Monitoring Agency:** Los Angeles Department of City Planning  
**Monitoring Phase:** Pre Construction  
**Monitoring Frequency:** One prior to issuance of a building permit  
**Action Indicating Compliance:** Review and sign-off by the Department of City Planning

**PDF-NOISE-1:** Equipment Control: The Project contractor(s) shall equip all construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards.

**Enforcement Agency:** Los Angeles Department of Building and Safety



**Monitoring Agency:** Los Angeles Department of Building and Safety  
**Monitoring Phase:** Construction  
**Monitoring Frequency:** Periodic Field Inspections  
**Action Indicating Compliance:** Field Inspection Sign-off within compliance report

**PDF-NOISE-2:** Vibration Control: As a precaution to avoid or minimize potential construction vibration damage, monitoring shall occur during excavation activities and during placement of foundation structures within 20 feet of the original Palladium building. Construction activities within this area shall utilize lower vibratory equipment options when they are available. In the event damage occurs, the monitor shall be authorized to halt construction activities until such activities are adjusted to avoid or minimize damage to the Building.

**Enforcement Agency:** Los Angeles Department of Building and Safety  
**Monitoring Agency:** Los Angeles Department of Building and Safety  
**Monitoring Phase:** Construction  
**Monitoring Frequency:** Daily observation during excavation/foundation work within 20 feet of the original Palladium building  
**Action Indicating Compliance:** Field Inspection Sign-off within compliance report

**PDF-NOISE-3:** Control of Amplified Sound: The sound levels of amplified sound equipment in ground level open space areas shall be adjusted during Project operations to avoid exceeding the following limits at the Project property lines: For the property line along Argyle Avenue – 66 dBA; for the property line along Sunset Boulevard – 71 dBA; for the property line along El Centro Avenue – 66 dBA; and for the property line along Selma Avenue Properties – 62 dBA.

**Enforcement Agency:** Los Angeles Department of City Planning  
**Monitoring Agency:** Los Angeles Department of City Planning  
**Monitoring Phase:** Operations  
**Monitoring Frequency:** Annually for first three years of Project operations  
**Action Indicating Compliance:** Field inspection report

**MM-NOISE-1:** Temporary construction noise barriers shall be implemented as follows:

- The Project shall ensure the provision of a 5 dBA noise barrier between the Project construction and the existing residential development on the northwest corner of Selma Avenue and Argyle Avenue (existing buildings between the residential development and the Project at the time of construction may contribute to the sound attenuation) ); and an 8 dBA, 16 foot high noise barrier between the Project and the Le Bon Hotel (allowing for a gate that may be opened from time to time for Site entry).
- If the following related projects adjacent to the Project Site (i.e. at Columbia Square, the Selma and Vine project, ~~the BLVD 6200 project south of Hollywood Boulevard,~~ or 6250 Sunset project) are occupied by new residents at the time of Project construction, then temporary noise barriers shall be provided between the Project construction and those occupied units. Based on the exceedance of the thresholds noted in the above analysis (given the distance from the Project Site and existing sound levels at the respective locations), the barriers

shall provide a sound reduction of 5 dBA between the Project Site and the 6250 Sunset project, and approximately 10 dBA between the Project and the remaining future projects.

**Enforcement Agency:** Los Angeles Department of Building and Safety  
**Monitoring Agency:** Los Angeles Department of Building and Safety  
**Monitoring Phase:** Construction  
**Monitoring Frequency:** Periodic field inspections  
**Action Indicating Compliance:** Field inspection sign-off; Compliance certification report submitted by Project contractor

**MM-NOISE-2:** Engine idling from construction equipment such as bulldozers and haul trucks shall be limited, to the extent feasible.

**Enforcement Agency:** Los Angeles Department of Building and Safety  
**Monitoring Agency:** Los Angeles Department of Building and Safety  
**Monitoring Phase:** Construction  
**Monitoring Frequency:** Periodic field inspections  
**Action Indicating Compliance:** Field inspection sign-off; Compliance certification report submitted by Project contractor

**PDF-FIRE-1:** Fire and Emergency Service Provisions: The following Fire and Emergency Medical Measures shall be provided for the long term operations of the Project.

- Owner supplied AED's (defibrillators) on selected floors to be used by on-site security as necessary. Security personnel to be fully trained on the use and operation of the AED's;
- Training on the AED's for tenant floor wardens and others; tenants to be encouraged to purchase their own AED's;
- CERT/first aid training for all floor wardens and others;
- CERT/first aid training made available and encouraged for all building occupants, if it can be accessed on-line;
- Joint trainings for LAFD personnel and building personnel site

**Enforcement Agency:** Los Angeles Fire Department  
**Monitoring Agency:** Los Angeles Fire Department  
**Monitoring Phase:** Operations  
**Monitoring Frequency:** Annually for first three years of Project operations  
**Action Indicating Compliance:** Field inspection report

**MM-FIRE-1:** Prior to the issuance of a building permit, the Applicant shall have additional consultation with the LAFD and shall incorporate all fire prevention and suppression features deemed appropriate by LAFD to the final design of the Project.

**Enforcement Agency:** Los Angeles Fire Department  
**Monitoring Agency:** Los Angeles Fire Department; Los Angeles Department of Building and Safety  
**Monitoring Phase:** Pre-construction

**Monitoring Frequency:** Once, prior to issuance of a building permit

**Action Indicating Compliance:** Approval of the plot plan by the Los Angeles Fire Department and Department of Building and Safety

**MM- FIRE-2:** Prior to the issuance of building permits, Project building plans including a plot plan and floor plan of the buildings shall be submitted for approval by the LAFD for review of all regulatory measures. The plot plan shall include the following minimum design features: location and grade of access roads and fire lanes, roadway widths, distance of buildings from an edge of a roadway of an improved street, access road, or designated fire lane, turning areas, and fire hydrants.

**Enforcement Agency:** Los Angeles Fire Department

**Monitoring Agency:** Los Angeles Fire Department; Los Angeles Department of Building and Safety

**Monitoring Phase:** Pre-construction

**Monitoring Frequency:** Once, prior to issuance of a building permit

**Action Indicating Compliance:** Approval of the plot plan by the Los Angeles Fire Department and Department of Building and Safety

**PDF-POL-1:** Project Security Features: The Project's security shall include, but not be limited to, the following design features:

- Installing and utilizing an extensive security camera network, with approximately 40-50 cameras throughout the underground and above-grade parking structure; the elevators; the common and amenity spaces; the lobby areas; and the rooftop and ground level outdoor open spaces.
- Maintaining all security camera footage for at least 30 days, and providing such footage to LAPD as needed.
- Maintaining approximately 30-40 staff on site, including at the lobby concierge desk and within the car valet areas. Designated staffers will be dedicated to monitoring the Project's security cameras and directing staff to locations where any suspicious activity is viewed.
- Requiring background checks of all residents, both prior to entering into a new lease at the Project, and prior to renewal of that lease.
- Controlling access to all building elevators, residences, and resident-only common areas through an electronic key fob specific to each user.
- Training staff on sound security policies for the Project's buildings.

**Enforcement Agency:** Los Angeles Police Department

**Monitoring Agency:** Los Angeles Police Department

**Monitoring Phase:** Operations

**Monitoring Frequency:** Annually for first three years of Project operations

**Action Indicating Compliance:** Field inspection report

**PDF-POL-2:** Site Uses: No nightclub shall be included in the Project, except that the Hollywood Palladium is permitted to continue its current operations as an event and concert venue.



**Enforcement Agency:** Los Angeles Department of City Planning  
**Monitoring Agency:** Los Angeles Department of City Planning  
**Monitoring Phase:** Pre-construction  
**Monitoring Frequency:** Once at Project approval  
**Action Indicating Compliance:** Certificate of occupancy

**MM- POL-1:** Prior to the occupancy of the Project, the Applicant shall provide the Hollywood Area Commanding Officer with a diagram of each portion of the property, including access routes, and additional information to facilitate potential LAPD responses.

**Enforcement Agency:** Los Angeles Police Department  
**Monitoring Agency:** Los Angeles Police Department; Los Angeles Department of Building and Safety  
**Monitoring Phase:** Construction  
**Monitoring Frequency:** Once, prior to certificate of occupancy  
**Action Indicating Compliance:** Sign-off on LAPD reviewed diagrams; Certificate of occupancy

**MM- SCH-1:** The Project shall pay required school mitigation fees pursuant to Government Code Section 65995 and in compliance with SB 50 (payment of developer fees).

**Enforcement Agency:** Los Angeles Department of Building and Safety; LAUSD  
**Monitoring Agency:** Los Angeles Department of Building and Safety; LAUSD  
**Monitoring Phase:** Pre-Construction  
**Monitoring Frequency:** Once at Plan Check  
**Action Indicating Compliance:** Receipt of payment from LAUSD

**MM- PRK-1:** In the event that the Project's amenities do not provide sufficient credit against the Project's land dedication and/or in lieu fee requirement, the Project applicant shall do one or more of the following: (1) dedicate additional parkland to meet the requirements of LAMC Section 17.12; (2) pay in-lieu fees for any land dedication requirement shortfall; or (3) provide on-site improvements equivalent in value to said in-lieu fees.

**Enforcement Agency:** Los Angeles Department of Recreation and Parks; Los Angeles Department of Building and Safety  
**Monitoring Agency:** Los Angeles Department of Recreation and Parks; Los Angeles Department of Building and Safety  
**Monitoring Phase:** Pre-operations  
**Monitoring Frequency:** Once prior to certification of occupancy  
**Action Indicating Compliance:** Certificate of occupancy

**PDF-TRAF-1:** A reciprocal easement agreement, or similar legal mechanism, shall be executed and recorded prior to issuance of final certificates of occupancy for the Project providing access for the Palladium lot located at 6221 Sunset Boulevard across the adjacent lot(s).

**Enforcement Agency:** Los Angeles Department of City Planning;

**Monitoring Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety  
**Monitoring Phase:** Pre-Construction  
**Monitoring Frequency:** Once, prior to issuance of certificate of occupancy  
**Action Indicating Compliance:** Completion of agreement per review for certificate of occupancy

**MM-TRAF-1:** Off-site truck staging shall be provided in a legal area furnished by the construction truck contractor. Trucks may use access points along Selma Avenue, El Centro Avenue, Argyle Avenue and Sunset Boulevard as needed. Trucks shall not be permitted to travel along local residential streets.

**Enforcement Agency:** Los Angeles Department of Transportation;  
**Monitoring Agency:** Los Angeles Department of Transportation; Los Angeles Department of Building and Safety  
**Monitoring Phase:** Construction  
**Monitoring Frequency:** Periodic field inspections  
**Action Indicating Compliance:** Field inspection sign-off and compliance certification report submitted by project contractor

**MM-TRAF-2:** A flagman flagger shall be placed at the truck entry and exits from the Project site onto Selma Avenue, El Centro Avenue, Argyle Avenue and/or Sunset Boulevard to control the flow of exiting trucks.

**Enforcement Agency:** Los Angeles Department of Transportation;  
**Monitoring Agency:** Los Angeles Department of Transportation; Los Angeles Department of Building and Safety  
**Monitoring Phase:** Construction  
**Monitoring Frequency:** Periodic field inspections  
**Action Indicating Compliance:** Field inspection sign-off; Compliance certification report submitted by project contractor

**MM-TRAF-3:** With the exception of concrete trucks during the continuous concrete pour, which would last approximately 1-2 days, deliveries ~~Deliveries~~ and pick-ups of construction materials shall be scheduled during non-peak travel periods (avoiding the peak commute hours of 7:00 to 9:00 AM and 3:00 to 7:00 PM on weekdays) and coordinated to reduce the potential of trucks waiting to load or unload for protracted periods of time.

**Enforcement Agency:** Los Angeles Department of Transportation;  
**Monitoring Agency:** Los Angeles Department of Transportation; Los Angeles Department of Building and Safety  
**Monitoring Phase:** Construction  
**Monitoring Frequency:** Periodic field inspections  
**Action Indicating Compliance:** Field inspection sign-off; Compliance certification report submitted by Project contractor

**MM-TRAF-4:** Access shall remain unobstructed for land uses in proximity to the Project site during Project construction.

**Enforcement Agency:** Los Angeles Department of Transportation;

**Monitoring Agency:** Los Angeles Department of Transportation; Los Angeles Department of Building and Safety

**Monitoring Phase:** Construction

**Monitoring Frequency:** Periodic field inspections

**Action Indicating Compliance:** Field inspection sign-off; Compliance certification report submitted by Project contractor

**MM-TRAF-5:** Permanent lane or sidewalk closures are not anticipated for the Project long-term operations. Temporary lane or sidewalk closures, when needed for construction, shall be scheduled to avoid peak commute hours (7:00 to 9:00 AM and 3:00 to 7:00 PM on weekdays) and peak school drop-off and pick-up hours to the extent possible, with the exception of concrete trucks during the continuous concrete pour, which would last approximately 1-2 days. In the event of full-time lane or sidewalk closures for construction, a worksite traffic control plan, approved by the City of Los Angeles, shall be implemented to safely route traffic or pedestrians around any such lane or sidewalk closures.

**Enforcement Agency:** Los Angeles Department of Transportation

**Monitoring Agency:** Los Angeles Department of Transportation

**Monitoring Phase:** Construction

**Monitoring Frequency:** Once at time needed for closure is identified; Periodic field inspections during closure

**Action Indicating Compliance:** Field inspection sign-off; Compliance certification report submitted by Project contractor

**MM-TRAF-6:** A Construction Management Plan shall be developed by the contractor and approved by the City of Los Angeles. In addition to the measures identified above, a Construction Management Plan shall include the following:

- Identify the locations of the off-site truck staging and detail measures to ensure that trucks use the specified haul route, and do not travel through nearby residential neighborhoods.
- Schedule vehicle movements to ensure that there are no vehicles waiting off-site and impeding public traffic flow on the surrounding streets.
- Establish requirements for loading/unloading and storage of materials on the Project site.
- Establish requirements for the temporary removal of parking spaces, time limits for the reduction of travel lanes and closing or diversion of pedestrian facilities to ensure the safety of pedestrian and access to local businesses.
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project site and neighboring businesses.
- During construction activities when construction worker parking cannot be accommodated on the Project site, a Construction Worker Parking Plan shall be prepared which identifies alternate parking location(s) for construction workers and the method of transportation to and from the Project site (if beyond walking distance) for approval by the City. The Construction Worker Parking Plan shall prohibit

construction worker parking on residential streets and prohibit on-street parking, except as approved by the City.

**Enforcement Agency:** Los Angeles Department of Transportation  
**Monitoring Agency:** Los Angeles Department of Transportation  
**Monitoring Phase:** Pre-construction; Construction  
**Monitoring Frequency:** Once prior to issuance of Building Permit; Periodic field inspections during construction  
**Action Indicating Compliance with Mitigation Feature:** Approval of Construction Traffic Management Plan from the Los Angeles Department of Transportation prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction)

**MM-TRAF-7:** ~~The Project shall implement the following physical roadway improvements that can be provided within existing roadway widths without requiring removal of parking spaces:~~

- ~~▪ Intersection 2, Cahuenga Boulevard & Franklin Avenue. Modify the signal equipment and operation to allow a southbound protected left-turn movement with a westbound right turn overlap. This improvement will require the southbound U-turns at the intersection to be restricted.~~
- ~~▪ Intersection 23, Gower Street & Franklin Avenue. Coordinate with the Columbia Square project and LADOT to arrange for a potential fair share contribution towards the implementation of an improvement proposed by the Columbia Square project that would upgrade the traffic signal equipment to allow for northbound right turn overlap.~~

~~**Enforcement Agency:** Los Angeles Department of Transportation; Department of Public Works  
**Monitoring Agency:** Los Angeles Department of Transportation; Department of Public Works  
**Monitoring Phase:** Pre-construction; Construction  
**Monitoring Frequency:** Once at plan approval; on-going during construction  
**Action Indicating Compliance:** Sign-off on road construction plans; Sign-off on completed construction work~~

**MM-TRAF-87:** The Project shall upgrade traffic signal controllers from a Type 170 to a Type 2070 at the following seven intersections within the Project study area:

- Yucca Street and Wilcox Avenue.
- Selma Avenue and Wilcox Avenue
- De Longpre Avenue and Wilcox Avenue
- Cole Avenue and Fountain Avenue
- Cahuenga Avenue and Fountain Avenue
- El Centro Avenue and Fountain Avenue
- Fountain Avenue and Gower Street

**Enforcement Agency:** Los Angeles Department of Transportation; Department of Public Works



**Monitoring Agency:** Los Angeles Department of Transportation; Department of Public Works

**Monitoring Phase:** Pre-construction; Construction

**Monitoring Frequency:** Once at plan approval; on-going during construction

**Action Indicating Compliance:** Sign-off on road construction plans; Sign-off on completed construction work

**MM-TRAF-98:** The Project shall implement a travel demand management (TDM) program, consistent with the recommendations of LADOT. The exact measures to be implemented will be determined when the plan is prepared, prior to issuance of a final certificate of occupancy for the Project. The TDM program shall ensure appropriate implementation of the Project's sidewalks/plazas, street trees/landscaping, street and pedestrian amenities, lighting and bicycle provisions to encourage alternative modes of transportation. It shall also include other features as appropriate, such as, for example, unbundled parking, i.e. separating the cost of purchasing or renting parking spaces from the cost of purchasing or renting a dwelling unit; rideshare programs, which could include the provision of an on-site transit and rideshare information center that provides assistance to help people form carpools or access transit alternatives, or priority parking for carpools; and/or a transit pass discount program, that typically includes negotiating with transit service providers to purchase transit passes in bulk at a discounted rate with resale to interested residents or employees at discounted prices; identification of an on-site TDM coordinator, making information available to residents and employees regarding alternative transportation options, monitoring and surveying requirements, a guaranteed ride home program, participation in the LADOT Mobility Hubs program (which could include secure bike parking, bike-share kiosks, car-share parking spaces and services, and/or electric scooter-share), contributing a one-time fixed-fee of \$100,000 to be deposited into the City's Bicycle Trust fund to implement bicycle improvements within the area of the Project, and/or participation in the Hollywood Transportation Management Organization (TMO) to be created by other major employers in Hollywood within the next few years. The Project is also providing ample bicycle parking and on-site bicycle repair facilities in compliance with Los Angeles City Municipal Code requirements.

**Enforcement Agency:** Los Angeles Department of Transportation

**Monitoring Agency:** Los Angeles Department of Transportation; Los Angeles Department of Public Works

**Monitoring Phase:** Pre-Operation; Operation

**Monitoring Frequency:** Once prior to issuance of a final certificate of occupancy; Annually during first three years of operations

**Action Indicating Compliance:** LADOT approval of Traffic TDM program; Annual consistency review

**MM-TRAF-10:** ~~The Project shall fund and coordinate implementation of a Traffic Calming Plan to reduce Project impacts on El Centro Avenue between Santa Monica Boulevard and Sunset Avenue. The Plan shall be approved by LADOT and include community consultation coordinated through the Council Office on the final selection of calming measures included. It shall include such physical measures as changes in street alignment, installation of barriers, speed humps, speed tables, raised crosswalks, chicanes, and chokers, and/or operational measures such as turn restrictions, speed limits, and installation of stop signs.~~

**Enforcement Agency:** ~~Los Angeles Department of Transportation; Los Angeles Department of Public Works~~

**Monitoring Agency:** ~~Los Angeles Department of Transportation; Los Angeles Department of Public Works~~

**Monitoring Phase:** ~~Construction and operations~~

**Monitoring Frequency:** ~~Once for plan approval; Periodic during construction of calming measures~~

**Action Indicating Compliance:** ~~LADOT approval of Traffic Calming Plan; Compliance approval by LADOT~~

**PDF-WS-1, Water Conservation Features:** The Project shall provide a reduction in overall use of potable water by 30 percent, from that allowed under the California Building Code (CBC) per City Ordinance No. 181,480. Further, it shall include towards meeting this end the following water saving features:

- Showerheads – no more than one showerhead per stall at common residential, hotel, fitness and commercial uses;
- High Efficiency Clothes Washers (Commercial/Residential);
- Individual Metering or Submetering for water use at separate commercial uses;
- Water-Saving Pool Filter;
- Leak Detection System for swimming pool and Jacuzzi;
- Cooling Tower Conductivity Controllers or Cooling Tower pH Conductivity Controllers;
- Weather Based Irrigation Controller;
- Drought Tolerant Plants (as feasible at landscaping);
- California native plants - minimum 30% of total landscaping at ground level courtyards;
- Drip/subsurface irrigation (micro-irrigation);
- Hydro-zoning (group plants with similar water requirements);
- Zoned irrigation;
- Separate metering or submetering for exterior landscaping water use;
- Building commissioning to ensure systems are operating as designed;
- Weather Based Irrigation Controller;
- Rainwater Harvesting; and
- Landscaping Contouring to minimize precipitation runoff.

**Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety

**Monitoring Agency:** Los Angeles Department of City Planning (approval of measures and performance standards); Los Angeles Department of Building and Safety (Operation)

**Monitoring Phase:** Construction; Operation

**Monitoring Frequency:** Once prior to issuance of final certificate of occupancy; Annually during first three years of operation

**Action Indicating Compliance:** Issuance of final certificate of occupancy; Annual compliance certification report (Operation)

**PDF-ELEC-1: Green Building Measures:** The Project shall be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code and meet the standards of the USGBC LEED® Silver Certification level or its equivalent. Green building measures would include, but are not limited to the following:

- Overall building efficiency would exceed Title 24 (2013) Building Envelope Energy Efficiency Standards by 10 percent;
- Use of glass/window areas for ventilation and daylight accessibility;
- Landscaping of roof decks;
- Roof top areas would be energy efficient, including landscaped terraces at some locations, with the remaining roof-top areas using high-albedo/reflective roofs such as light-colored, build-up "white" roofs to reduce energy loads and enhance air quality;
- Trees and other landscaping (approximately 53,600 sq.ft. , inclusive of the pool and rooftop terraces, or 35 percent of the Site area, would provide shading and capture carbon dioxide emissions;
- Installation of energy-efficient appliances (Energy Star™);
- Glass/window areas for ventilation and daylight accessibility;
- Double-paned windows to keep heat out during summer months and keep heat inside during winter months;
- Lighting controls with occupancy sensors to take advantage of available natural light; and
- Elevator TV monitors with programming that would provide residents real-time updates on energy usage in the building and tips on how they can conserve energy.
- Occupancy-sensor controlled lighting in the parking structure.

**Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety

**Monitoring Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety

**Monitoring Phase:** Pre-construction; Operation

**Monitoring Frequency:** Annually during first three years of operation

**Action Indicating Compliance:** Annual compliance certification report (Operation)

*Page C-1*

## **CONDITIONS OF APPROVAL**

### **A. Entitlement Conditions**

2. **CRA/LA.** Prior to the issuance of a building permit, the project applicant shall enter into an Owner Participation Agreement with the CRA/LA, A designated Local Authority, the successor agency to the Community Redevelopment Agency of the City of Los Angeles.

- a. ~~The OPA shall include a minimum set aside of 5% for households representing a 50-120% of the Area Median Income (AMI).~~

## **FINDINGS**

Page F-5

**4. Charter Findings – City Charter Sections 555, 556 and 558 (General Plan Amendment).** The proposed General Plan Amendment complies with the procedures as specified in Section 555 of the Charter, including:

- a. **Amendment in Whole or in Part.** The General Plan Amendment before the City Planning Commission represents an Amendment in Part of the Hollywood Community Plan, representing a change to the physical identity of the Selma Avenue area of the project site, which is currently designated as Commercial Manufacturing, but is otherwise zoned as [Q]C4. The Hollywood Community Plan identifies the CM and P Zones as being consistent with the Commercial Manufacturing designation. As such, the C4 Zone is not a corresponding zone under the Commercial Manufacturing land use designation and the General Plan Amendment is necessary to provide consistency and uniformity to the land use and zoning provisions of the Hollywood Community Plan.

The amendment of the Selma Avenue portion, from Commercial Manufacturing to Regional Center Commercial, would bring the property's C4 Zone into conformance the Hollywood Community Plan, which identifies the C2, C4, P, PB, RAS3, and RAS4 Zones as being consistent with the Regional Center Commercial designation. Moreover, the Selma Avenue portion of the project site, together with the immediately abutting lot to the west (under different ownership and not part of the project), are the only parcels in the vicinity that are incorrectly designated with the underlying zone. The general plan amendment request grants the City an opportunity to correct this inconsistency in a manner that is reflective of the existing land use and zoning pattern, and which supports the character of development of adjacent uses.

The Amendment would not only allow the City to address the land use inconsistency, but would allow for a development that furthers the Hollywood Palladium's strong social identity as an entertainment venue dating back to its use as the Original Famous Player-Lasky Corporation motion picture studio lot. The Selma Avenue portion then became part of the Hollywood Palladium's use and development, from the 1940's onward. The Palladium played a pivotal role in the formation of Hollywood as the center of the entertainment business, thereby participating in Hollywood's economic growth and development. The Palladium has been found eligible for the National Register, California Register and as a local Historic-Cultural Monument, and the Selma Avenue area is part of the Palladium's significant physical and social identity and speaks to its participation in the ongoing growth and evolution of Hollywood.

The project site is located in the 'Hollywood Center,' identified in the Hollywood Community Plan as the commercial center of Hollywood and the entertainment center for the region. The preservation of the Palladium and the amendment to the Selma Avenue portion furthers these characteristics while simultaneously satisfying the goals and objectives of the Regional Center Commercial land use designation by accommodating land uses that serve a regional market with uses and services that support, and are integrated with, primary uses, and which promote development of high-activity areas in locations designed to induce pedestrian activity. The Framework identifies the CR, C1.5, C4, and [Q]C2 Zones as corresponding to Regional Centers.

Moreover, the Framework Element's goals, policies, and objectives for Industrial land uses considers the "potential re-designation of marginal industrial lands for



alternative uses by amending the community plans” where it can be demonstrated that (Policy 3.14.6):

- There is no available method to assemble parcels into a unified site that will support viable industrial development
- The size and/or configuration of parcels is insufficient to accommodate viable industrial development
- Infrastructure and improvements are economically infeasible to support the needs of industrial uses
- The conversion of industrial lands to alternative uses will not create a fragmented pattern of development and reduce the integrity and viability of existing industrial areas;
- The conversion of industrial lands will not result in adverse impacts to residential neighborhoods, commercial districts, or other land uses
- The reduction of industrial lands will not adversely impact the City’s ability to accommodate sufficient industrial uses to provide jobs
- Where existing industrial uses constitute a hazard to adjacent residential or natural areas

The Selma Avenue portion of the project site is located to the immediate north of the Palladium site, which is designated as Regional Center Commercial. The Selma Avenue parcel is an approximate 41,115 square-foot site surrounded to the north and east by multi-family residences and mixed-use developments which include multi-family residences. Additional multi-family residences are located less than 300 feet west of the Selma Avenue site, rendering the site ill-suited for industrial development or manufacturing uses. The re-designation of the Selma Avenue portion to an alternative use (Regional Center) will not result in a fragmented pattern of development, but would otherwise bring the site into conformity with the underlying zone and adjacent Regional Center land uses to the immediate north, south, east, and approximately 240 feet to the west. As currently designated, the Selma Avenue portion creates a fragmented land use pattern that will be corrected with the instant plan amendment and zone change request. The conversion of industrial land will not reduce the integrity or viability of existing industrial areas as the property is one of only two parcels incorrectly designated as Commercial Manufacturing, that is inconsistent with the underlying zone, and is not, or has been, used for industrial or manufacturing uses.

Moreover, should the Selma Avenue portion of the site be developed with an industrial use, pursuant to the existing Commercial Manufacturing land use designation, it would not only pose a hazard to the adjoining residential uses, but could potentially compromise the integrity and viability of the Hollywood Palladium venue, which continues to operate as an entertainment center for the region and holds social, economic, and geographic significance to Hollywood.

- b. **Initiation of Amendments.** In compliance with this sub-section, the Director of Planning proposed the amendment to Hollywood Community Plan (General Plan-Land Use Element), pursuant to the Memo issued by the Department of City Planning March 18, 2014. The request was submitted on June 20, 2014 and was initiated, via signature by the Director’s designee, on June 27, 2014.
- c. **Commission and Mayoral Recommendations.** The noticing and hearing requirements of the General Plan Amendment were satisfied, pursuant to LAMC Section 12.32-C,3. The hearing was scheduled, duly noticed, and held in City Hall on April 15, 2015. The City Planning Commission shall make its

recommendation to the Mayor upon a recommendation of approval, or to the City Council and the Mayor upon a recommendation of disapproval.

## **FINDINGS OF FACT (CEQA)**

*Page F-24*

### **II. ENVIRONMENTAL DOCUMENTATION BACKGROUND**

The project was reviewed by the Los Angeles Department of City Planning, Environmental Analysis Section (serving as Lead Agency) in accordance with the requirements of the California Environmental Quality Act ("CEQA") (Pub Resources Code §21000 et seq.; 14 Cal. Code Regs. §15000 et seq.). The City prepared an Initial Study in accordance with Section 15063(a) of the State CEQA Guidelines. Pursuant to the provision of Section 15082 of the State CEQA Guidelines, the City then circulated a Notice of Preparation (NOP) to State, regional, and local agencies, and members of the public for a 33-day period commencing August 8, 2013 and ending September 9, 2013. The purpose of the NOP was to formally inform the public that the City was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR.

In addition, a public scoping meeting was conducted on August 29, 2013 to further inform public agencies and other interested parties of the Project and to solicit input regarding the Draft EIR. The meeting provided interested individuals, groups, and public agencies the opportunity to provide oral and written comments to the Lead Agency regarding the scope and focus of the Draft EIR as described in the NOP and Initial Study. Written comment letters responding to the NOP were submitted to the City by public agencies and interested organizations. Comment letters were received from five public agencies. They include: State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit (OPR); State of California, Department of Transportation (Caltrans); Metropolitan Transportation Authority (Metro); South Coast Air Quality Management District (SCAQMD); and City of Los Angeles Fire Department (LAFD). Also, written comments were provided by an additional 13 interested organizations and/or individual parties via mail, e-mail or submittal at the NOP Scoping Meeting. Twenty-two attendees to the Scoping Meeting filled out a sign-in sheet and shared oral comments. The NOP letters and comments received during the comment period, as well as comment sheets from the public scoping meeting, are included in Appendix A of the Draft EIR.

The Draft EIR evaluated in detail the potential effects of the proposed project. It also analyzed the effects of a reasonable range of seven alternatives to the proposed project, including potential effects of a "No Project" alternative. The Draft EIR for the project (State Clearinghouse No. 2013081022), incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and City of Los Angeles (City) CEQA Guidelines (Pub. Resources Code §21000, et seq.; 14 Cal. Code Regs. §15000, et seq.; City of Los Angeles Environmental Quality Act Guidelines). The Draft EIR was circulated for a 45-day public comment period beginning on October 23, 2014, which closed on December 8, 2014. Thus, the public review period of the Draft EIR lasted a total of 47 days, beyond the 45 days required by CEQA Guidelines Section 15105(a). Copies of the written comments received during the 47-day public review period are provided in the Final EIR. Pursuant to Section 15088 of the CEQA Guidelines, the City of Los Angeles, as lead agency, reviewed all comments received during the review period for the Draft EIR and responded to each comment in Section III of the Final EIR.

The City published a Final EIR for the project on March 31, 2015, which is hereby incorporated by reference in full. The Final EIR is intended to serve as an informational document for public agency decision-makers and the general public regarding objectives and components of the proposed project. The Final EIR addresses the environmental effects associated with implementation of the proposed project, identifies feasible mitigation measures and alternatives that may be adopted to reduce or eliminate these impacts, and includes written responses to all comments received on the Draft EIR during the public review period. Responses were sent to all

public agencies that made comments on the Draft EIR at least 10 days prior to certification of the Final EIR pursuant to CEQA Guidelines Section 15088(b). In addition, all individuals that commented on the Draft EIR also received a copy of the Final EIR. The Final EIR was also made available for review on the City's website. Hard copies of the Final EIR were also made available at four libraries and the City of Los Angeles Department of Planning. Notices regarding availability of the Final EIR were sent to those within a 500-foot radius of the project site as well as individuals who commented on the Draft EIR, attended the NOP scoping meeting, and provided comments during the NOP comment period.

The City published an Errata (Errata No. 1) to the EIR on November 6, 2015 on the City's website, 13 days prior to the November 19, 2015 City Planning Commission hearing. The Errata (Errata No. 1) is hereby incorporated by reference in full. The Errata (Errata No. 1) included additional information and analyses in response to comments made subsequent to publication of the Final EIR during the public hearing process.

At its meeting of December 10, 2015, the City Planning Commission granted in part, and denied in part, the appeal of VTT-72213-1A, and approved Planning staff's recommendations relative to the General Plan Amendment, Zone Change, Height District Change, Conditional Use requests, Zoning Administrator's Interpretation, and Site Plan Review for a project consisting of 731 residential units, of which 5% (37 units) will be reserved for households earning 50-120% AMI, and 24,000 square feet of retail and restaurant uses. The provision of restricted affordable units does not result in changes to the analysis in the EIR, does not grant the applicant an increase in density in excess of which was disclosed in the EIR, or which was allowed through the general plan amendment or zone change, does not result in impacts that were not otherwise analyzed in the EIR, and does not otherwise grant the project exceptions from requirements of the Los Angeles Municipal Code or other applicable regulatory standards. Pursuant to CEQA Section 15382: "An economic or social change by itself shall not be considered a significant effect on the environment." Moreover, the intent of CEQA is to disclose the environmental effects of proposed activities associated with a project, and the provision of restricted affordable units does not result in environmental effects that are different or distinct from those associated with market-rate units.

On March 2, 2016, the City published a second Errata on the City's website, 12 days prior to the Planning and Land Use Committee's March 15, 2016 meeting. Errata No. 2 is hereby incorporated by reference in full. Errata No. 2 includes additional information and analyses in response to comments made subsequent to the City Planning Commission's determination on the appeal of VTT-72213 and actions and recommendations of CPC-2014-3808-GPA-ZC-HD-CU-CUB-ZAI-SPR.

A duly noticed public hearing on the project was held jointly by the Hearing Officer for the City Planning Commission and the Deputy Advisory Agency on April 15, 2015. A subsequent duly noticed public hearing on the project was held by the City Planning Commission on November 19, 2015. The project was continued to an additional City Planning Commission hearing on December 10, 2015.

The documents and other materials that constitute the record of proceedings on which the City of Los Angeles' CEQA findings are based are located at the Department of City Planning, Environmental Review Section, 200 North Main Street, Room 750, Los Angeles California 90012. This information is provided in compliance with CEQA Section 21081.6(a)(2).



*Page F-25*

#### **IV. DESCRIPTION OF PROPOSED PROJECT**

The proposed project would protect and enhance the historic Palladium and continue its operation as an entertainment and event venue, and add two new buildings on the surface parking lots on the northeast and southwest portions of the project Site. These new buildings would contain a mix of uses. The maximum developed floor area, as floor area is defined by the Los Angeles Municipal Code, would be approximately 927,354 square feet, including the existing 63,354-square-foot Palladium.

The project would include up to 731 residential units with lobby space, approximately 14,000 square feet of retail and restaurant space within the ground level of the new Project buildings, and re-activation of 10,000 square feet of existing but currently vacant ancillary retail space within the Palladium. Of the 731 residential dwelling units, 5% (37 units) would be available to households earning 50-120% AMI. The project would also include approximately 33,800 square feet of publicly accessible, landscaped outdoor space for visitors and pedestrians in street level courtyards. Project residents and hotel guests would also have indoor recreation facilities and outdoor open space amenities in a pool terrace and roof-top terraces. The total amount of open space provided would be pursuant to, and would exceed the City's Open Space requirements.

Parking would meet Code requirements within subterranean and above-grade parking within the Project's new buildings, and would also include approximately 820 spaces for bicycle parking.

The majority of the new uses would be located in two new buildings that would contain residential units. Development at the southwest and northeast corners of the project site would be lower in height and setback from the street. The project's Sunset Boulevard frontage would be only one story, slightly lower than the Palladium, and setback farther than the Palladium, to allow the Palladium to remain the focal point on Sunset Boulevard. This building would likely contain a restaurant or other retail use. The Selma Avenue frontage would also be setback from the street, and be stepped down in height. Ground level retail uses would also be located along the Selma Avenue frontage, and wrap around along El Centro Avenue. The low-rise building at the El Centro Avenue/Selma Avenue intersection would also contain above-ground parking. The project buildings are arranged around three landscaped courtyards (i.e., Sunset Court, Argyle Court, and El Centro Court) linked by walkways that allow pedestrian and/or vehicular access from those surrounding streets. Each of the project components is discussed in more detail below.

Many letters submitted during the public comment period for the Draft EIR expressed support for Alternative 7: Alternative Site Design - Enhanced Setbacks. Alternative 7 has several environmental benefits, including providing a greater setback for the project's new tower element from Selma Avenue, thereby improving east-west view across the northern portion of the project site. Alternative 7 would also reduce the amount of subterranean parking proposed, which would reduce the amount of excavation needed and associated construction truck trips (and associated greenhouse gas emissions) to remove the excavated earth. Alternative 7 was also determined in the Draft EIR to be the environmentally superior alternative. For purposes of these findings, "the project" shall refer to that which was approved by the City Planning Commission on December 10, 2015, not the Original Project as initially proposed and analyzed in the EIR.

The project, as approved by the Lead Agency would include the same development program and a similar site plan as Alternative 7: Alternative Site Design - Enhanced Setbacks, which was approved by the Advisory Agency. Similar to Alternative 7, the approved project would also have an FAR of 6.0:1; require the same entitlements as the project; and include the same historic commitments, including nomination of the Palladium as a Local Historic-Cultural Monument and implementation of a Palladium Preservation and Enhancement Plan.



Alternative 7 included a few project design modifications from the original Project to enhance views across the Project site and reduce environmental impacts associated with excavation. The taller building elements were modified. The taller element of the easterly building would be setback from Selma Avenue by an additional 22.5 feet, from approximately 77.5 feet under the Project, to 100 feet under the Alternative 7 (now 93.5 feet as approved by CPC). This improves east-west views over the Project Site, for instance from new residential development proposed at the Columbia Square project. The taller building elements would also narrow slightly at various locations, most notably behind the Palladium.

Similar to Alternative 7, the approved project raised the height of the pool terrace to the podium levels over the parking structures across the project Site, linking the pool and outdoor amenity areas into a single, larger more integrated space. The number of subterranean parking levels between Alternative 7 and the approved project would remain at a maximum of four levels, with the remaining parking spaces in a 7-story above grade parking structure with a podium height 75 feet as approved by CPC. The subterranean parking minimizes contact with the ground water table and reduces excavation and associated construction truck trips. The same number of parking spaces would be provided per City Code requirements.

For purposes of these findings, "the Project" or "the proposed Project" shall refer to that which was approved by CPC on December 10, 2015, reflecting height reductions and minor design modifications from Alternative 7 as described in the Alternatives Section of the EIR, and not the project as proposed in the Project Description of the EIR.

The appearance of the approved project is well within the scope of Alternative 7, which was analyzed in the EIR, and which was approved by the Advisory Agency for VTT-72213. The edges of the taller building elements continue to be recessed/set back, with a curvilinear architectural grid that articulates outward from the units with usable outdoor balcony space inter-stitched between. The articulated grid and interstitial balconies would not read as a solid wall, but as transitional elements in contrast with solid building facades.

*Page F-27*

### **Residential Buildings**

The majority of proposed new uses would be located in two buildings up to approximately 350 feet in height that would serve as a backdrop to the Palladium. The project applicant has designed the project with courtyards and setbacks to frame the historic Palladium. Both buildings would be developed with residential uses and together would contain up to 731 residential units, of which 5% (37 units) would be set aside for households earning between 50-120% AMI. The new buildings would occupy the northeast and southwest parts of the project site, with primary vehicular and pedestrian access via a major courtyard (Argyle Court) and semi-circular, covered entryway on Argyle Avenue. The site would also be accessible to pedestrians via the courtyards facing Sunset Boulevard (Sunset Court) and El Centro Avenue (El Centro Court). The buildings and courtyard entries would be connected via landscaped pedestrian walkways within the project site.

Sincerely,



Luciralia Ibarra  
Senior City Planner  
Major Projects, Department of City Planning

