CF 16-1058

BUREAU OF ENGINEERING - SPECIFIC CONDITIONS

1. That a 5-foot wide strip of land be dedicated along Washington Boulevard adjoining the tract **except where there are existing structures to remain** (between Broadway and Hill Street) to complete a 55-foot wide half right-of-way in accordance with BOULEVARD II of LA MOBILITY PLAN. **This dedication shall be limited to the depth of 10-feet measured from below the finished sidewalk grade**. In addition 15-foot by 15-foot property line cut corners be dedicated at the intersections with Broadway and Main Street **limited to elevations measured 14-feet from above the finished sidewalk grades**.

2. That 15-foot by 15-foot property line cut corners be dedicated along 21st Street adjoining the tract with intersections with Hill Street, Broadway and Main Street limited to elevations measured 14-feet from above the finished sidewalk grades.

3. That portion of Main Street adjoining the tract in variable width from approximately 7-feet to approximately 8-feet from the depth of 10-feet and as shown on the revised vesting tentative map stamp dated June 23, 2016 be permitted to be merged with the remainder of the tract map pursuant to Section 66499.20.2 of the State Government Code, and in addition, the following conditions be executed by the applicant and administered by the City Engineer:

   a. That consents to the street being merged and waivers of any damages that may accrue as a result of such mergers be obtained from all property owners who might have certain rights in the area being merged.

   b. That satisfactory arrangements be made with all public utility agencies maintaining existing facilities within the area being merged.

   c. That a certified survey map be submitted for during the final map check showing the dimensions and areas being merged with this map satisfactory to the City Engineer.

   Note: The Advisory Agency hereby finds that the dedications to be merged are unnecessary for present or prospective public purposes and all owners of the interest in the real property within the subdivision have or will have consented to the merger prior to the recordation of the final map.

4. That any surcharge fee in conjunction with the street merger request be paid.

5. That a Covenant and Agreement be recorded satisfactory to the City Engineer binding the subdivider and all successors to the following:

   a. That the owners shall be required to maintain all elements of the structures below the limited **Washington Boulevard** rights-of-way and merger area

below **Main Street** in a safe and usable condition to the satisfaction of the City Engineer. The City shall be given reasonable access to the structures within and adjacent to the limited street rights-of-way areas for any necessary inspection, upon request during normal business hours. The City may request the owners to repair or replace damaged, defective or unsafe structural elements or to correct unacceptable conditions at the owner's expense if owner elects not to do so. Owner shall grant reasonable access to City's contractor to make said repairs.

b. The owner shall be required to limit use and occupancy of the structures below the limited street rights-of-way for **parking use only**. No combustible material shall be stored in the merger area.

c. The owners shall obtain a B-permit from the City Engineer for any substantial structural modification below the street right-of-way area and for any structural modification areas and for any structural element outside said areas which provides lateral or vertical support to structures within the areas.

6. That the subdivider execute and record an agreement satisfactory to the City Engineer to waive any right to make or prosecute any claims or demands against the City for any damage that may occur to the proposed structures underneath the limited dedication and merger of public street as stated herein in connection with the use and maintenance operations within said street easement.

7. That the subdivider make a request to the Central District Office of the Bureau of Engineering to determine the capacity of the existing sewers in this area.

8. That a set of drawings for airspace lots be submitted to the City Engineer showing the followings:

   a. Plan view at different elevations.

   b. Isometric views.

   c. Elevation views.

   d. Section cuts at all locations where air space lot boundaries change.

9. That the owners of the property record an agreement satisfactory to the City Engineer stating that they will grant the necessary private easements for ingress and egress purposes to serve proposed airspace lots to use upon the sale of the respective lots and they will maintain the private easements free and clear of obstructions and in safe conditions for use at all times.

10. That the following improvements be either constructed prior to recordation of the final map or that the construction be suitably guaranteed:

a. Improve Washington Boulevard being dedicated and adjoining the tract by the construction of an additional concrete sidewalk within the newly dedicated area to complete a full-width concrete sidewalk with tree wells including any necessary removal and reconstruction of the existing improvements satisfactory to the City Engineer.

b. Improve all the dedicated corner cuts by placing additional concrete for sidewalk area purposes including any necessary removal and reconstruction of the existing improvements satisfactory to the City Engineer.

DEPARTMENT OF BUILDING AND SAFETY, GRADING DIVISION

11. Comply with any requirements with the Department of Building and Safety, Grading Division for recordation of the final map and issuance of any permit.

DEPARTMENT OF BUILDING AND SAFETY, ZONING DIVISION

12. 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. Provide a copy of affidavits AFF-7146, AFF-44155, AF-94-747416-MB, AF-03-3574476, AF-03-3574477, PKG-946, and PKG-4639. Show compliance with all the conditions/requirements of the above affidavits as applicable. Termination of above affidavits may be required after the Map has been recorded. Obtain approval from the Department, on the termination form, prior to recording.

    b. Show all street dedication(s) as required by Bureau of Engineering and provide net lot area after all dedication. “Area” requirements shall be re-checked as per net lot area after street dedication.

    c. Obtain permit for the demolition or removal of the existing structure on the site if the existing building and/or parking spaces project beyond the new property line after the required street dedication is taken. Provide copy of the demolition permit and signed inspection card to show completion of the demolition work prior to obtaining the Zoning clearance.

    d. Provide a copy of CPC cases CPC-2014-1771-GPA-VZC-SN-VCU-MCUP-CUX-ZV-SPR and CPC-2014-1772-DA. Show compliance with all the conditions/requirements of the CPC cases as applicable.

    e. Comply with the Q conditions from Ordinance 180,987 or obtain City Planning approval to change the Q conditions.

f. Required parking spaces are required to remain for the remaining structure on Proposed Ground Lot 1. Show location of all parking spaces and access driveways on the site. Existing Certificate of Occupancy for Permit 1956LA49612 indicates the existing building required 688 parking spaces. Provide copies of permits and final inspection cards for any new garages, carports, or parking restriping to provide parking on the site or provide an off-site parking affidavit for these required parking spaces on another site within 750 feet of the lot.

g. Record a Covenant and Agreement to treat the buildings and structures located in an Air Space Subdivision as if they were within a single lot.

Notes: Each Air Space lot shall have access to a street by one or more easements or other entitlements to use in a form satisfactory to the Advisory Agency and the City Engineer.

The existing or proposed building plans have not been checked for and shall comply with Building and Zoning Code requirements. With the exception of revised health or safety standards, the subdivider shall have a vested right to proceed with the proposed development in substantial compliance with the ordinances, policies, and standards in effect at the time the subdivision application was deemed complete.

The proposed buildings may not comply with City of Los Angeles Building Code requirements concerning exterior wall, protection of openings and exit requirements with respect to the proposed and existing property lines. Compliance shall be to the satisfactory of LADBS at the time of plan check. Lot tie affidavit may be required to tie Ground Lot 3 and 4 together as one parcel.

An appointment is required for the issuance of a clearance letter from the Department of Building and Safety. The applicant is asked to contact Laura Duong at (213) 482-0434 to schedule an appointment.

DEPARTMENT OF TRANSPORTATION

13. Prior to recordation of the final map, satisfactory arrangements shall be made with the Department of Transportation to assure: (MM)

a. Parking stalls shall be designed so that a vehicle is not required to back into or out of any public street or sidewalk, LAMC 12.21-A,5(i)a.

b. A parking area and driveway plan be submitted to the Citywide Planning Coordination Section of the Department of Transportation for approval prior to submittal of building permit plans for plan check by the Department of Building and Safety. Transportation approvals are conducted at 201 N.

Figueroa Street Suite 550.

c. That a fee in the amount of $205 be paid for the Department of Transportation as required per Ordinance No. 183,270 and LAMC Section 19.15 prior to recordation of the final map. Note: the applicant may be required to comply with any other applicable fees per this new ordinance.

d. A minimum of 60-foot and 40-foot reservoir space(s) be provided between any ingress security gate(s) and the property line when driveway is serving more than 300 and 100 parking spaces respectively. A minimum of 20-foot reservoir space be provided between any security gate(s) and the property line when driveway is serving less than 100 parking spaces.

e. The applicant shall comply with the project requirements and mitigation measures as stated in the June 19, 2015 DOT Traffic Study Assessment letter to Karen Hoo, City Planner, Department of City Planning. All subsequent revisions and modifications shall remain in effect. A copy of the letter is located in the case file.

FIRE DEPARTMENT

14. Prior to the recordation of the final map, a suitable arrangement shall be made satisfactory to the Fire Department, binding the subdivider and all successors to the following: (MM)

a. Submit plot plans for Fire Department approval and review prior to recordation of Tract Action.

b. Construction of public or private roadway in the proposed development shall not exceed 15 percent in grade.

c. During demolition, the Fire Department access will remain clear and unobstructed.

d. No proposed development utilizing cluster, group, or condominium design of one or two family dwellings shall be more than 150 feet from the edge of the roadway of an improved street, access road, or designated fire lane.

e. Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

f. No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along path of travel.

g. Any roof elevation changes in excess of 3 feet may require the installation

of ships ladders.

Note: The applicant is further advised that all subsequent contact regarding these conditions must be with the Hydrant and Access Unit. This would include clarification, verification of condition compliance and plans or building permit applications, etc., and shall be accomplished BY APPOINTMENT ONLY, in order to assure that you receive service with a minimum amount of waiting please call (213) 482-6504. You should advise any consultant representing you of this requirement as well.

LOS ANGELES UNIFIED SCHOOL DISTRICT (LAUSD)

15. Prior to the issuance of any demolition or grading permit or any other permit allowing site preparation and/or construction activities on the site, satisfactory arrangements shall be made with the Los Angeles Unified School District, implementing the measures for demolition and construction contained in the LAUSD comment letter dated August 13, 2014 attached to the Vesting Tract file. The project site is located on the pedestrian and bus routes for students attending the grade 9 to 12 Santee Education Complex and Frida Kahlo High School. Therefore, the applicant shall make timely contact for coordination to safeguard pedestrians/ motorists with the LAUSD Transportation Branch, phone no. (213) 580-2920, and the principals or designees of the Santee Education Complex and Frida Kahlo High School. (This condition may be cleared by a written communication from the LAUSD Transportation Branch attesting to the required coordination and/or the principals of the above referenced schools and to the satisfaction of the Advisory Agency).

DEPARTMENT OF WATER AND POWER

16. Arrangements shall be made for compliance with the Los Angeles Department of Water and Power (LADWP) Water System Rules and requirements, satisfactory to the LADWP memo dated December 4, 2014. Upon compliance with these conditions and requirements, LADWP's Water Services Organization will forward the necessary clearances to the Bureau of Engineering. (This condition shall be deemed cleared at the time the City Engineer clears Condition No. S-1.(c).)

BUREAU OF STREET LIGHTING

17. Prior to the recordation of the final map or issuance of the Certificate of Occupancy (C of O), street lighting improvement plans shall be submitted for review and the owner shall provide a good faith effort via a ballot process for the formation or annexation of the property within the boundary of the development into a Street Lighting Maintenance Assessment District.

BUREAU OF SANITATION

18. Satisfactory arrangements shall be made with the Bureau of Sanitation, Wastewater Collection Systems Division for compliance with its sewer system review and requirements. Upon compliance with its conditions and requirements, the Bureau of Sanitation, Wastewater Collection Systems Division will forward the necessary clearances to the Bureau of Engineering. (This condition shall be deemed cleared at the time the City Engineer clears Condition No. S-1. (d).)

INFORMATION TECHNOLOGY AGENCY

19. That satisfactory arrangements be made in accordance with the requirements of the Information Technology Agency to assure that cable television facilities will be installed in the same manner as other required improvements. Refer to the LAMC Section 17.05-N. Written evidence of such arrangements must be submitted to the Information Technology Agency, 200 North Main Street, 12th Floor, Los Angeles, CA 90012, 213 922-8363.

DEPARTMENT OF RECREATION AND PARKS

20. That the Quimby fee be based on the proposed C2 Zone. (MM)

URBAN FORESTRY DIVISION AND THE DEPARTMENT OF CITY PLANNING

21. Prior to the issuance of a grading permit, a plot plan prepared by a reputable tree expert, indicating the location, size, type, and condition of all existing trees on the site shall be submitted for approval by the Department of City Planning. All trees in the public right-of-way shall be provided per the current Urban Forestry Division standards.

    Replacement by a minimum of 24-inch box trees in the parkway and on the site of the 59 trees to be removed, shall be required for the unavoidable loss of desirable trees on the site, and to the satisfaction of the Advisory Agency. (MM)

    Note: Removal of all trees in the public right-of-way shall require approval of the Board of Public Works. Contact: Urban Forestry Division at: (213) 485-5675. Failure to comply with this condition as written shall require the filing of a modification to this tract map in order to clear the condition.

DEPARTMENT OF CITY PLANNING-SITE SPECIFIC CONDITIONS

22. Prior to the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:

Limit the proposed development to four ground lots, 76 airspace lots and 1,444 residential condominiums.

a. Off-street parking for residential and commercial uses shall comply with the requirements of Case No. CPC-2014-1771-GPA-VZC-SN-VCU-MCUP-CUX-ZV-SPR-MSC. In the event that Case No. CPC-2014-1771-GPA-VZC-SN-VCU-MCUP-CUX-ZV-SPR-MSC is not approved, the project shall comply with the following requirements:

Provide a minimum of 2 covered off-street parking spaces per dwelling unit, plus 1/4 guest parking spaces per dwelling unit. All guest spaces shall be readily accessible, conveniently located, specifically reserved for guest parking, posted and maintained satisfactory to the Department of Building and Safety.

Commercial and Hotel parking shall comply with LAMC Section 12.24-A.

Directions to guest parking spaces shall be clearly posted. Tandem parking spaces shall not be used for guest parking.

In addition, prior to issuance of a building permit, a parking plan showing off-street parking spaces, as required by the Advisory Agency, be submitted for review and approval by the Department of City Planning (200 North Spring Street, Room 750).

b. That a solar access report shall be submitted to the satisfaction of the Advisory Agency prior to obtaining a grading permit.

c. That the subdivider considers the use of natural gas and/or solar energy and consults with the Department of Water and Power and Southern California Gas Company regarding feasible energy conservation measures.

d. Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material.

e. The applicant shall install shielded lighting to reduce any potential illumination affecting adjacent properties.

23. Prior to the issuance of the building permit or the recordation of the final map, a copy of the CPC-2014-1771-GPA-VZC-SN-VCU-MCUP-CUX-ZV-SPR-MSC and CPC-2014-1772-DA shall be submitted to the satisfaction of the Advisory Agency. In the event that CPC-2014-1771-GPA-VZC-SN-VCU-MCUP-CUX-ZV-SPR-MSC is not approved, the subdivider shall submit a tract modification.

24. That the subdivider shall make suitable arrangements for clearance with the Community Redevelopment Agency, or its successor in interest, for the Council District 9 Redevelopment Project area.

25. Prior to the issuance of a building permit, grading permit and the recordation of the final tract map, the subdivider shall record and execute a Covenant and Agreement to comply with the South Los Angeles Alcohol Sales Specific Plan.

26. **Indemnification and Reimbursement of Litigation Costs.**

Applicant shall do all of the following:

(i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

(ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.

(iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than $25,000. The City's failure to notice or collect the deposit does not relieve the applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be

responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the applicant otherwise created by this condition.

DEPARTMENT OF CITY PLANNING-ENVIRONMENTAL MITIGATION MEASURES

27. Prior to recordation of the final map the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department requiring the subdivider to identify mitigation monitors who shall provide periodic status reports on the implementation of mitigation items required by Mitigation Condition No. 13, 14, 20, and 21 of the Tract's approval satisfactory to the Advisory Agency. The mitigation monitors shall be identified as to their areas of responsibility, and phase of intervention (pre-construction, construction, post-construction/maintenance) to ensure continued implementation of the above mentioned mitigation items.

28. Prior to the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:

This Mitigation Monitoring Program ("MMP") has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the

environment." In addition, Section 15097(a) of the State CEQA Guidelines requires that:

> *In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.*

The City of Los Angeles is the Lead Agency for the project and therefore is responsible for administering and implementing the MMP. Where appropriate, the project's Draft and Final EIRs identified mitigation measures and project design features to avoid or to mitigate potential impacts identified to a level where no significant impact on the environment would occur, or impacts would be reduced to the extent feasible. This MMP is designed to monitor implementation of the project's mitigation measures as well as its project design features.
As shown on the following pages, each required mitigation measure and proposed project design feature for the project is listed and categorized by impact area, with an accompanying identification of the following:

- **Enforcement Agency:** The agency with the power to enforce the Mitigation Measure/Project Design Feature.
- **Monitoring Agency:** The agency to which reports involving feasibility, compliance, implementation and development are made.
- **Monitoring Phase:** The phase of the project during which the Mitigation Measure/Project Design Feature shall be monitored.
- **Monitoring Frequency:** The frequency at which the Mitigation Measure/Project Design Feature shall be monitored.
- **Action Indicating Compliance:** The action of which the Enforcement or Monitoring Agency indicates that compliance with the required Mitigation Measure/Project Design Feature has been implemented.

The project's MMP will be in place throughout all phases of the project. The project applicant will be responsible for implementing all mitigation measures unless otherwise noted. The applicant shall also be obligated to provide a certification report to the appropriate monitoring agency and the appropriate enforcement agency that compliance with the required mitigation measure or project design feature has been implemented. The City's existing planning, engineering, review, and inspection processes will be used as the basic foundation for the MMP procedures and will also serve to provide the documentation for the reporting program.

The certification report shall be submitted to the Major Project's Section at the Los Angeles Department of City Planning. Each report will be submitted to the Major Project's Section annually following completion/implementation of the applicable mitigation measures and project design features and shall include sufficient information and documentation (such as building or demolition permits) to reasonably determine whether the intent of the measure has been satisfied. The City, in conjunction with the applicant, shall assure that project construction and operation occurs in accordance with the MMP.

After review and approval of the final MMP by the City, minor changes and modifications to the MMP are permitted, but can only be made by the applicant subject to the approval by the City. The City, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed changes or modification. The flexibility is necessary due to the nature of the MMP, the need to protect the environment in the most efficient manner, and the need to reflect changes in regulatory conditions, such as but not limited to changes to building code requirements, updates to LEED "Silver" standards, and changes in Secretary of Interior Standards. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the City.

29. **Mitigation Measures And Project Design Features**. The development of the project site is hereby bound to the following Mitigation Measures and Project Design Features, which are conditions of approval for the project.

MITIGATION MEASURES AND PROJECT DESIGN FEATURES

Aesthetics/Visual Quality

Mitigation Measure

MM-AES-1: All new sidewalks along the project's street frontages shall be paved with pervious (permeable) concrete or interlocking pavers to create a distinctive pedestrian environment and to increase the opportunity for stormwater infiltration on the site.

Monitoring Phase: Pre-construction, Construction and Occupancy
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning
Monitoring Frequency: Field inspection(s) following construction
Action Indicating Compliance: Field inspection sign-off

Aesthetics/Light and Glare

Project Design Features

PDF-AES-1: The proposed lighting displays (at all levels) shall have a wattage draw not to exceed 12 watts/square feet to meet Title 24 2013 requirements.

Monitoring Phase: Pre-construction, Construction and Occupancy
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once, prior to issuance of building permits
Action Indicating Compliance: Issuance of building permits

PDF-AES-2: The proposed lighting displays (at all levels) shall be fully dimmable and controlled by a programmable timer so that luminance levels may be adjusted according to the time of day.

Monitoring Phase: Pre-construction, Construction and Occupancy
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once, prior to issuance of building permits
Action Indicating Compliance: Issuance of building permits

PDF-AES-3: The proposed lighting displays, calculated cumulatively with all project generated lighting, shall have a maximum lumen output that shall not exceed the light intensity level of 2.0 footcandles or more at any sensitive receptor. The proposed lighting displays (at all levels) shall have a maximum lumen output that does not exceed the maximum levels as shown in Table IV.B-2.

Monitoring Phase: Pre-construction, Construction and Occupancy
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once, prior to issuance of building permits
Action Indicating Compliance: Issuance of building permits

Summary Calculations of Allowable Sign Luminance to Achieve Standard of 2.0 Foot-Candles at Sensitive Receptors

The Reef Only - Summary Calculations of Allowable Sign Luminance to Achieve 2.0 Foot-Candles at Sensitive Receptors								
Project Façade	Zone	Signage Identification	Height Above Ground (ft)	Area (SF) Max Allowable	Distance to Sensitive Receptor (ft)	Maximum Nighttime Allowed Sign Luminance (candelas/sq. m)	Target Sign Luminance for Nighttime viewing (candelas/sq. m)	Illumination Produced by Target Luminance
North Facing	North							
	3	Zone A-North	165	13885	433	200	200	0.1
		Zone A-East	165	13664	365	200	200	1.9
		Total Illumination Created by Target Illumination(fc) at Sensitive Receptor						2.0
East Facing	East							
	3	Zone A	140	13665	1566	3900	250	0.1
		Total Illumination Created by Target Illumination(fc) at Sensitive Receptor						0.1
West Facing	West							
	3	Zone A	140	13665	618	600	250	0.8
		Total Illumination Created by Target Illumination(fc) at Sensitive Receptor						0.8

Phase 1 Only - Summary Calculations of Allowable Sign Luminance to Achieve 2.0 Foot-Candles at Sensitive Receptors								
Project Façade	Zone	Signage Identification	Height Above Ground (ft)	Area (SF) Max Allowable	Distance to Sensitive Receptor (ft)	Maximum Nighttime Allowed Sign Luminance (candelas/sq. m)	Target Sign Luminance for Nighttime viewing (candelas/sq. m)	Illumination Produced by Target Luminance
North								
North Facing	3	Zone A-North	165	13885	433	195	195	0.13
		Zone A-East	165	13664	365	195	195	1.85
		Zone B	75	1364	664	75	75	0.02
	2	Zone A	25	240	330	35	35	0.01
	1	Zone A	11	720	329	35	35	0.02
	Total Illumination Created by Target Illumination(fc) at Sensitive Receptor							2.0
East								
East Facing	3	Zone A	140	13665	1566	3300	250	0.1294
		Zone B	75	2926	1682	3300	250	0.0240
		Hotel Glass	120	13360	1227	8	8	0.0066
	Total Illumination Created by Target Illumination(fc) at Sensitive Receptor							0.16
South								
South Facing	3	Zone B	75	1364	1262	4200	250	0.0199
	2	Zone B	25	768	950	4200	250	0.0198
	1	Zone B	11	3072	950	4200	250	0.0791
		Hotel Glass	120	5600	991	8	8	0.0042
	Total Illumination Created by Target Illumination(fc) at Sensitive Receptor							0.12
West								
West Facing	3	Zone A	140	13665	618	340	250	0.8311
		Zone B	75	2926	607	340	250	0.1847
	2	Zone A	25	935	603	340	250	0.0598
		Zone B	25	768	603	340	250	0.0492
	1	Zone A	11	2441	602	340	250	0.1564
		Zone B	11	3072	602	340	250	0.1969
		Hotel Glass	125	13360	989	8	8	0.0102
	Total Illumination Created by Target Illumination(fc) at Sensitive Receptor							1.49

Full Project - Summary Calculations of Allowable Sign Luminance to Achieve Standard of 2.0 Foot-Candles at Sensitive Receptors								
Project Façade	Zone	Signage Identification	Height Above Ground (ft)	Area (SF) Max Allowable	Distance to Sensitive Receptor (ft)	Maximum Nighttime Allowed Sign Luminance (candelas/sq. m)	Target Sign Luminance for Nighttime viewing (candelas/sq.m)	Illumination Produced by Target Luminance
North Facing	North							
	3	Zone A-North	165	13885	433	170	170	0.12
		Zone A-East	165	13664	365	170	170	1.62
		Zone B	75	1364	664	50	50	0.01
	2	Zone A	25	0	330	10	10	0.00
		Zone C	25	0	103	10	10	0.00
	1	Zone A	11	960	329	10	10	0.01
		Zone C	11	960	101	10	10	0.09
	Window	North Tower Glass	195	26180	237	8	8	0.15
		South Tower Glass	210	29260	712	8	8	0.04
	Total Illumination Created by Target Illumination(fc) at Sensitive Receptor							2.0
East Facing	East							
	3	Zone A	140	13665	1566	1800	250	0.1294
		Zone B	75	2926	1682	1800	250	0.0240
	2	Zone C	25	768	1180	1800	250	0.0128
		Zone D	25	695	1154	1800	250	0.0121
	1	Zone C	11	3072	1180	1800	250	0.0513
		Zone D	11	2185	1154	1800	250	0.0381
	Window	North Tower Glass	190	82000	1236	8	8	0.0399
		South Tower Glass	210	93000	1281	8	8	0.0421
		Hotel Glass	120	13360	1227	8	8	0.0066
	Total Illumination Created by Target Illumination(fc) at Sensitive Receptor							0.36
South Facing	South							
	3	Zone B	75	1364	1262	2100	250	0.0199
	2	Zone B	25	768	950	2100	250	0.0198
		Zone D	25	695	775	2100	250	0.0269
	1	Zone B	11	3072	950	2100	250	0.0791
		Zone D	11	2185	775	2100	250	0.0845
	Window	North Tower Glass	190	26180	1215	8	8	0.0132
		South Tower Glass	210	29260	636	8	8	0.0538
		Hotel Glass	120	5600	991	8	8	0.0042
	Total Illumination Created by Target Illumination(fc) at Sensitive Receptor							0.30
West Facing	West							
	3	Zone A	140	13665	618	330	250	0.8311
		Zone B	75	2926	607	330	250	0.1847
	2	Zone A	25	935	603	330	250	0.0598
		Zone B	25	768	603	330	250	0.0492
	1	Zone A	11	2441	602	330	250	0.1564
		Zone B	11	3072	602	330	250	0.1969
	Window	North Tower Glass	125	82000	1605	8	8	0.0237
		South Tower Glass	125	93000	1266	8	8	0.0431
		Hotel Glass	125	13360	989	8	8	0.0102
	Total Illumination Created by Target Illumination(fc) at Sensitive Receptor							1.56

PDF-AES-4: Light emitting diodes on signs shall be oriented down towards the street, rather than up towards the sky, or signs should be provided with a method of shielding diodes so that lighting is not wasted shining into the night sky.

Monitoring Phase: Pre-construction, Construction and Occupancy
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once, prior to issuance of building permits
Action Indicating Compliance: Issuance of building permits

PDF-AES-5: The proposed displays shall transition smoothly at a consistent rate of speed from the daytime brightness to the permitted nighttime brightness levels, beginning at 45 minutes prior to sunset and concluding the transition to nighttime brightness 45 minutes after sunset. Where applicable, they shall also transition smoothly at a consistent rate of speed from the permitted nighttime brightness to the permitted daytime brightness levels, beginning 45 minutes prior to sunrise and concluding the transition to daytime brightness 45 minutes after sunrise.

Monitoring Phase: Pre-construction, Construction and Occupancy
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Field inspection(s) following construction
Action Indicating Compliance: Field inspection sign-off

Mitigation Measure

MM-AES-2: Operating hours for lighted Limited Animation I and Controlled Refresh I signage within Vertical Sign Zone 3 shall be limited to 7:00 a.m. to 10:00 p.m., Sunday through Thursday, and 7:00 a.m. to 12:00 midnight, Friday and Saturday.

Monitoring Phase: Pre-construction, Construction and Occupancy
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Field inspection(s) following construction
Action Indicating Compliance: Field inspection sign-off

Air Quality

Project Design Features

PDF-AQ-1: The project will use low-emission Tier 3 off-road construction equipment.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Construction bid document verification and periodic field inspections during construction
Action Indicating Compliance: Construction bid document sign off; Compliance Certification report by project contractor

PDF-AQ-2: The project will include watering of active construction areas at least three times daily to minimize fugitive dust emissions.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Periodic field inspection(s)
Action Indicating Compliance: Field inspection sign-off

PDF-AQ-3: The project will not include any fireplaces (i.e., hearths) in the residential land uses.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once, prior to issuance of building permits
Action Indicating Compliance: Issuance of building permits

Mitigation Measures

MM-AQ-1: The project shall install a sealed HVAC system in conjunction with MERV 13 or higher rated filters for all residential development within the project site. The sealed air system will be designed so that all ambient air introduced into the interior living space would be filtered through MERV 13 or higher rated filters to remove diesel particulate matter (DPM) and other particulate matter. The owner/property manager shall maintain and replace MERV 13 or greater filters in accordance with the manufacturer's recommendations.

Monitoring Phase: Construction, Operations
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Prior to issuance of building permits; Periodic field inspections during operations
Action Indicating Compliance: Issuance of building permits; Field inspection sign off

MM-AQ-2: The project shall locate open space areas (courtyards, patios, recreation areas) in locations that are screened from the freeway by project buildings to the maximum extent feasible.

Monitoring Phase: Pre-construction
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning
Monitoring Frequency: Prior to issuance of building permits
Action Indicating Compliance: Plan review sign-off

MM-AQ-3: The project shall plant vegetation between receptors and freeway sources in those locations where open space areas are not already screened from the freeway by buildings.

Monitoring Phase: Construction
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning
Monitoring Frequency: Field inspection(s) following construction
Action Indicating Compliance: Field inspection sign-off

MM-AQ-4: To the extent allowed by Code, the project will minimize operable windows facing the freeway.

Monitoring Phase: Construction
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning
Monitoring Frequency: Prior to issuance of building permits
Action Indicating Compliance: Plan review sign-off

MM-AQ-5: The project shall locate air intakes for ventilation equipment as far from freeway sources as possible.

Monitoring Phase: Construction
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning
Monitoring Frequency: Prior to issuance of building permits
Action Indicating Compliance: Plan review sign-off

Cultural Resources/Paleontological Resources

Mitigation Measures

MM-CUL-1: If any paleontological materials are encountered during the course of the earth-moving activities, the project shall be halted or the work shall be diverted to avoid the potential paleontological resources in order to allow the resources and their significance to be assessed. The services of a paleontologist shall be secured by contacting the Center for Public Paleontology at the University of Southern California; University of California, Los Angeles; California State University, Long Beach; or the Los Angeles County Natural History Museum to assess the resources and evaluate the impact. Copies of the paleontological survey, study, or report shall be submitted to the Los Angeles County Natural History Museum. If paleontological resources are identified and determined to be significant, the paleontologist shall formulate a mitigation plan to mitigate impacts, which may include removing and preserving the paleontological resources in an appropriate manner. A covenant and agreement shall be recorded prior to obtaining a grading permit.

Monitoring Phase: Construction
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning
Monitoring Frequency: At time of resource discovery, should it occur
Action Indicating Compliance: Submittal of report by a qualified paleontologist

MM-CUL-2: The project's construction superintendent shall be instructed by a paleontologist or other qualified paleontological monitor regarding identification of conditions whereby potential paleontological resources could occur. The construction superintendent shall be sufficiently informed that he or she will be able to recognize when paleontological resources have been uncovered and require that grading be temporarily diverted around the resource site until the monitor has evaluated and, if warranted, recovered the resources. Other contractor personnel shall be briefed by the superintendent or other trained personnel on procedures to be followed in the event that paleontological resources or previously unrecorded resources are encountered by earth-moving activities. The briefing shall be presented to new contractor personnel as necessary. The name and telephone number of the paleontological monitor shall be provided to appropriate contractor personnel. Similarly, and if necessary, the monitor shall be empowered to temporarily divert grading around an exposed fossil specimen to facilitate evaluation and, if warranted, recovery.

Monitoring Phase: Construction
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning
Monitoring Frequency: Prior to issuance of grading permits, periodic during excavation
Action Indicating Compliance: Issuance of grading permits

MM-CUL-3: All significant fossil specimens recovered at the project site as a result of the mitigation program shall be prepared, identified, curated, and catalogued in accordance with designated museum repository requirements.

Monitoring Phase: Construction
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning
Monitoring Frequency: At time of resource discovery, should it occur
Action Indicating Compliance: Submittal of report by a qualified paleontologist

Greenhouse Gases

Project Design Features

PDF-GHG-1: The project will not include any fireplaces (i.e., hearths) in the residential land uses.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once, prior to issuance of building permits
Action Indicating Compliance: Issuance of building permits

PDF-GHG-2: Where appliances are offered by builders, Energy Star appliances will be installed in the residential and non-residential buildings.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once, prior to issuance of building permits
Action Indicating Compliance: Issuance of building permits

PDF-GHG-3: Where lighting is provided by builders, high efficiency light bulbs and lighting fixtures will be installed in residential and non-residential buildings.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once, prior to issuance of building permits
Action Indicating Compliance: Issuance of building permits

PDF-GHG-4: The project will reduce potable water use by 20 percent compared to baseline water use levels through the use of water saving fixtures and or flow restrictors consistent with the California Green Building Standards.

Monitoring Phase: Construction
Enforcement Agency: Department of Water and Power
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once, prior to issuance of building permits
Action Indicating Compliance: Issuance of building permits

Hazards and Hazardous Materials

Mitigation Measure

MM-HAZ-1: Prior to construction, **s**oils at the project site shall be tested for the presence and levels of radon. Testing shall be conducted by a Radon Tester who is certified in accordance with California Health and Safety Code Sections 106750-106795. If radon levels of over 4.0 pCi/L are encountered within or immediately adjacent to the project site, a mitigation program shall be designed by a Certified Radon Mitigator, and incorporated into the design of the project, subject to the review and approval of LADBS.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once prior to construction; prior to issuance of building
Permits, if elevated levels of radon are found
Action Indicating Compliance: Approval of radon report by LADBS; approval of radon mitigation program by LADBS, if warranted

Noise

Mitigation Measures

MM-NOI-1: The project applicant, or successor in interest, shall install a temporary noise control barrier in the northern area of the East Block construction site. The noise control barrier shall be designed

to reduce construction-related noise levels at the adjacent multi-family residential structure (on Washington Boulevard across the project site) by minimum 5 dBA.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Periodic field inspection(s)
Action Indicating Compliance: Field inspection sign-off; compliance certification report submitted by project contractor

MM-NOI-2: All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications. The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Periodic field inspection(s)
Action Indicating Compliance: Field inspection sign-off; compliance certification report submitted by project contractor

MM-NOI-3: Construction activities whose specific location on the project site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen such activities from these land uses to the maximum extent possible.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Periodic field inspection(s)
Action Indicating Compliance: Field inspection sign-off; compliance certification report submitted by project contractor

MM-NOI-4: Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels. Examples include the use of drills and jackhammers.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning

Monitoring Frequency: Periodic field inspection(s)
Action Indicating Compliance: Field inspection sign-off; compliance certification report submitted by project contractor

Public Services/Fire Protection

Project Design Feature

PDF-PS-1: The project shall be equipped with a sprinkler system meeting the requirements of LAMC Section 57.09.07(A).

Monitoring Phase: Construction
Enforcement Agency: Los Angeles Fire Department
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once, prior to issuance of building permits
Action Indicating Compliance: Issuance of building permits

Public Services/Police Protection

Mitigation Measures

MM-PS-1: The project shall comply with the design guidelines outlined in the LAPD Design Out Crime Guidelines, which recommend using natural surveillance to maximize visibility, natural access control that restricts or encourages appropriate site and building access, and territorial reinforcement to define ownership and separate public and private space. Specifically, the project would:

- Provide on-site security personnel whose duties shall include but not be limited to the following:
  - Monitoring entrances and exits;
  - Managing and monitoring fire/life/safety systems; and
  - Controlling and monitoring activities in the parking facilities.

- Install security industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas;

- Install closed-circuit television at select locations including (but not limited to) entry and exit points, loading docks, public plazas and parking areas;

- Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment;

- Provide lighting of building entries, pedestrian walkways, and public open spaces to provide pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings;

- Design public spaces to be easily patrolled and accessed by safety personnel;

- Design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites; and

- Limit visually obstructed and infrequently accessed "dead zones."

Monitoring Phase: Construction
Enforcement Agency: Los Angeles Police Department
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once, prior to issuance of building permits
Action Indicating Compliance: LAPD sign off on reviewed plans; issuance of building permits

MM-PS-2: Prior to the issuance of a certificate of occupancy for each construction phase and on-going during operations, the applicant shall develop an Emergency Procedures Plan to address emergency concerns and practices. The plan shall be subject to review by LAPD.

Monitoring Phase: Construction, Operations
Enforcement Agency: Los Angeles Police Department
Monitoring Agency: Department of City Planning
Monitoring Frequency: Prior to issuance of building permits; periodic field inspections
Action Indicating Compliance: LAPD sign off on reviewed plans; field inspection sign off

Transportation

Project Design Feature

PDF-TR-1: The project design includes the following features to improve pedestrian facilities and to provide a safe and walkable pedestrian environment, to increase the number of walking trips, and provide for on-site facilities to reduce the need to make vehicle trips off-site.

- Provide sidewalks fronting the site according to the Downtown Street Standards.

- Improve sidewalks adjacent to and within the project according to Section 3, Part A of the Downtown Design Guide.
- Add pedestrian amenities such as: shade, benches, pedestrian-scale lighting, etc.
- Provide mid-block paseos, pedestrian plazas/courtyards, and elevated terrace walkways as detailed in the Project Description.
- Provide a variety of land uses (mixed use) within the project, as set forth in the Project Description.
- Provide pedestrian-scale retail commercial uses along street frontages.
- Provide on-site facilities such as ATM machines, cafeterias, and convenience shopping.

- Install additional safety measures (such as caution signage for bicyclists and pedestrians) near driveways and access points.
- Provide a bike valet at the hotel to serve all project visitors.

Monitoring Phase: Pre-construction
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning
Monitoring Frequency: Prior to issuance of building permits
Action Indicating Compliance: Plan review sign-off

Mitigation Measures

MM-TR-1: Hill Street, Existing: Hill Street is currently a Modified Secondary and has a 31' half roadway width in a 46' right-of-way, with 15' sidewalk. There are two travel lanes in each direction, with left turn lanes at intersections, and on-street parking. There is no midblock central turn lane. Proposed: No changes are proposed to either the right-of-way or roadway curb to curb widths for this stretch of Hill Street, as the standard is currently exceeded by 1'. However the roadway configuration would be changed to accommodate a central turn lane and the bike lanes planned by the City. (The City's Bicycle Plan identifies bike lanes on Hill Street, but there are currently no design plans available as the improvement is not yet scheduled). On-street parking could not be allowed on either side of Hill Street adjacent to the project.

Current Roadway Standards: City standards require a 35' half roadway in a 45' half right-of-way with 10' sidewalk. The proposed half roadway would remain at 31' so would fall short of the half roadway standard by 4'.The proposed sidewalk of 15' would exceed the standards by 5'.The proposed half right-of-way would exceed the half right-of-way standard by 1'. Updated Mobility Element Standards: The new City standards for an Avenue II

roadway (on adoption of the Updated Mobility Element) will require a 28’ half roadway width, in a 43’ half right of way with 15’ sidewalk. The proposed configuration would meet or exceed all these standards.

Monitoring Phase: Construction of Adjacent Parcels
Enforcement Agency: Los Angeles Department of Transportation (LADOT)
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once prior to occupancy
Action Indicating Compliance: Field inspection sign-off and compliance certification report submitted by project contractor

MM-TR-2: Broadway, Existing: Broadway currently has a 60’ roadway width in a 90’ right-of-way, with 15’ sidewalks. There are two travel lanes in each direction, with left turn lanes at intersections, and on-street parking. There is no midblock central turn lane. Proposed: No changes are proposed for this stretch of Broadway. Reducing sidewalk widths would be inconsistent with the project’s goals of enhancing the pedestrian environment and supporting a transit corridor for Broadway adjacent to the project. In support of these goals, curb extensions are proposed for midblock (around an enhancement of the existing signalized mid-block pedestrian crossing) and at 21st Street. These would be 7’ sidewalk extensions - which would provide a 22’ sidewalk and leave a 13’ travel lane adjacent to the curb. On-street parking would remain at other locations – which would provide a buffer between travel lanes and sidewalks as well as convenient short-stay parking. Bus stops are also proposed along this stretch of Broadway – locations to be determined. A proposed subterranean parking garage would extend under the public sidewalk by 7’ from the property line (to 8’ from the existing roadway curb).

Current Roadway Standards: Broadway meets current right-of-way requirements, but is 5’ less than the half roadway curb-curb standards. Widening the roadway by 5’ to meet standards would require reducing sidewalk widths by 5’ from 15’ to 10’.

Updated Mobility Element Standards: The new City standards for an Avenue II roadway (on adoption of the Updated Mobility Element) will require a 28’ half roadway width, in a 43’ half right of way with 15’ sidewalk. The proposed configuration would meet or exceed all these standards.

Monitoring Phase: Construction of Adjacent Parcels
Enforcement Agency: Los Angeles Department of Transportation (LADOT)
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once prior to occupancy
Action Indicating Compliance: Field inspection sign-off and compliance certification report submitted to LADOT by project contractor

MM-TR-3: Main Street, Existing: Main Street currently has a 35' half roadway width in a 50' half right-of-way, with 15' sidewalk. There are two travel lanes in each direction with left turn lanes at intersections and a central turn lane midblock. On street parking is allowed. Proposed: No roadway changes are proposed for this stretch of Main Street. Reducing sidewalk widths would be inconsistent with the project's goals of enhancing the pedestrian environment. On-street parking would remain – which would provide a buffer between travel lanes and sidewalks as well as convenient short-stay parking. Some curb space would be allocated to passenger loading zones for the residential buildings. A proposed subterranean parking garage would extend under the public sidewalk by 9' from the new property line (to 8' from the existing roadway curb).

Current Roadway Standards: Current City standards require a 40' half roadway in a 52' half right-of-way with 12' sidewalk. Widening the roadway by 5' to meet roadway standards would require reducing the sidewalk width by 3' from 15' to 12'. Updated Mobility Element Standards: The new City standards for an Avenue I roadway (on adoption of the Updated Mobility Element) will require a 35' half roadway width, in a 50' half right of way with 15' sidewalk. The proposed configuration would exactly meet all these standards.

Monitoring Phase: Construction of Adjacent Parcels
Enforcement Agency: Los Angeles Department of Transportation (LADOT)
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once prior to occupancy
Action Indicating Compliance: Field inspection sign-off and compliance certification report submitted to LADOT by project contractor

MM-TR-4: Washington Boulevard, Existing: Washington Boulevard currently has an 84' roadway width in a 100' right-of-way. It includes a 26' foot "median" for the Blue Line light rail line – which results in a 29' half roadway and 8' sidewalk in a 50' half right-of-way. There are two travel lanes in each direction, with left turn lanes at intersections, and no on-street parking. Proposed: No changes are proposed to the roadway curb-curb section (the required roadway

section for a Major Highway Class II cannot be achieved because of the Blue Line). The project cannot meet the right-of-way dedication on the West Block due to the existing Reef building. The project will provide a 5' dedication on the East Block, for a 15' sidewalk and 57' half right-of-way. (The Proposed Updated South East Los Angeles Community Plan (SELACP) anticipates a 5' easement requirement for a 15' sidewalk). A proposed subterranean parking garage would extend under the public sidewalk by 7' from the new property line (to 3' from the roadway curb).

Current Roadway Standards: City standards currently require a 40' roadway in a 52' right-of-way with 12' sidewalk. The half roadway width standard cannot be met because of the LRT line. A 2-foot dedication would be required to meet the 52- half right-of-way standard. The proposed 5' dedication would result in a 15' sidewalk which would meet requirements and a 57' half right of way which would exceed requirements. Updated Mobility Element Standards: The new City standards for a Boulevard II roadway (on adoption of the Updated Mobility Element) will require a 40' half roadway width, in a 55' half right of way with 15' sidewalk. The proposed configuration would be unable to meet the roadway standard because of the rail line, but would meet the sidewalk requirement and exceed the right-of-way requirement.

Monitoring Phase: Construction of Adjacent Parcels
Enforcement Agency: Los Angeles Department of Transportation (LADOT)
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once prior to occupancy
Action Indicating Compliance: Field inspection sign-off and compliance certification report submitted to LADOT by project contractor

MM-TR-5: 21st Street, Existing: 21st Street currently has a 20' half roadway width in a 30' right-of-way, with 10' sidewalk, which meets City standards. There is one travel lane in each direction, with no left turn lanes at intersections, and on-street parking is allowed. Project Mitigation: No changes are proposed to 21st Street. On-street parking shall remain where possible.

Current Roadway Standards: Current City standards for a Noncontinuous Local Street require an 18' half roadway in a 27' half right-of-way with 9' sidewalk. The current roadway exceeds all these standards. Updated Mobility Element Standards: The new City standards for a Noncontinuous Local Street (on adoption of the Updated Mobility Element) will require a 15' half roadway width,

in a 25' half right of way with 10' sidewalk. The proposed configuration would meet or exceed all these standards.

Monitoring Phase: Construction of Adjacent Parcels
Enforcement Agency: Los Angeles Department of Transportation (LADOT)
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once prior to occupancy
Action Indicating Compliance: Field inspection sign-off and compliance certification report submitted to LADOT by project contractor

MM-TR-6: Prior to the issuance of certificate of occupancy, the project applicant shall implement new traffic signals, subject to LADOT approval, at the following locations adjacent to the project:

- Main Street & Project Garage Driveway
- Main Street & 21st Street
- Broadway & 21st Street
- Hill Street & 21st Street

Monitoring Phase: Construction
Enforcement Agency: Los Angeles Department of Transportation (LADOT)
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once prior to occupancy
Action Indicating Compliance: Field inspection sign-off and compliance certification report submitted to LADOT by project contractor

MM-TR-7: Feasible mitigation improvements were identified at a number of locations, which shall be implemented when enough project development has occurred to reach 55% of the total project PM peak hour trips. The project applicant shall implement the following physical mitigation measures to enhance intersection levels of service:

- ***The 17th Street Corridor Between Los Angeles Street and Grand Avenue:*** This mitigation measure would enhance the capacity of 17th Street. The project shall restripe 17th Street from the existing two lanes to three lanes between Los Angeles Street and Grand Avenue.

  The current curb-to-curb right of way along 17th Street is wide enough to accommodate an additional thru lane in the westbound direction. This improvement would require that on-street parking,

located along the southern edge of the roadway, either be permanently removed or restricted during peak periods from Los Angeles Street to Grand Avenue.

This measure would require the removal (temporary or permanent) of 15 metered parking spaces and 7 non-metered spaces along 17th Street. An analysis (per LADOT guidelines, and summarized in Traffic Study Appendix E) showed that there are sufficient unoccupied parking spaces in the adjacent area (within two blocks and for the majority of spaces within one block) to accommodate the loss of these on-street parking spaces, so this measure would cause less than significant impacts on parking in this corridor.

Specific improvements included under this Mitigation Measure are as described below. These improvements have been included in the mitigation analysis. Except where identified, these measures could be implemented within the existing curb-to-curb roadway widths and within existing rights-of-way. Improvement concept plans are shown in The Traffic Study, Appendix F (Figure F.1 and Figure F.2) which is located in Appendix IV.N of this EIR.

- ***Main Street at 17th Street Intersection:*** The project shall restripe the westbound approach on 17th Street to add an additional thru lane. This would modify the existing configuration of one shared left-thru lane and one shared thru-right lane, to a configuration of one shared left-thru lane, one thru lane and one shared thru-right lane.

- ***Broadway at 17th Street Intersection:*** The project shall restripe the westbound approach on 17th Street to add an additional thru lane. This would modify the existing configuration of one shared left-thru lane and one shared thru-right lane, to a configuration of one shared left-thru lane, one thru lane and one shared thru-right lane.

- ***Hill Street at 17th Street Intersection:*** The project shall restripe the westbound approach on 17th Street to add an additional thru lane. This would modify the existing configuration of one shared left-thru lane and one shared thru-right lane, to a configuration of one shared left-thru lane, one thru lane and one shared thru-right lane.

- ***Olive Street at 17th Street Intersection:*** The proposed mitigation measure at this intersection is to restripe the

westbound approach on 17th Street to add an additional thru lane. This would modify the existing configuration of one thru lane and one shared thru-right lane, to a configuration of two thru lanes and one shared thru-right lane.

- ***Grand Avenue at 17th Street Intersection:*** The project shall restripe the westbound approach on 17th Street to add an additional thru lane. This would modify the existing configuration of one shared left-thru lane and one thru lane, to a configuration of one shared left-thru lane and two thru lanes.

Monitoring Phase: Construction of East Parcel when enough project development has occurred to reach 55% of the total project PM peak hour trips
Enforcement Agency: Los Angeles Department of Transportation (LADOT)
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once prior to occupancy
Action Indicating Compliance: Field inspection sign-off and compliance certification report submitted to LADOT by project contractor

MM-TR-8: Two additional roadway improvement measures shall be implemented by the project applicant on the 18th Street corridor, at Hill and at Broadway, to provide an additional eastbound through lane, when enough project development has occurred to reach 70% of the total project PM peak hour trips, as follows:

- ***Hill Street at 18th Street Intersection:*** The project shall restripe the eastbound approach on 18th Street to add an additional thru lane. This would modify the existing configuration of one left turn lane, one thru lane and one shared thru-right lane, to a configuration of one shared left-thru lane, one thru lane, and one shared thru-right lane.

- ***Broadway at 18th Street Intersection:*** The project shall restripe the eastbound approach on 18th Street to add an additional thru lane. This would modify the existing configuration of one left turn lane, one thru lane and one shared thru-right lane, to a configuration of one shared left-thru lane, one thru lane, and one shared thru-right lane.

Monitoring Phase: Construction of East Parcel when enough project development has occurred to reach 70% of the total project PM peak hour trips
Enforcement Agency: Los Angeles Department of Transportation (LADOT)
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once prior to occupancy
Action Indicating Compliance: Field inspection sign-off and compliance

certification report submitted to LADOT by project contractor

MM-TR-9: ***Intersection Traffic Signal Upgrades:*** The traffic signal controllers at some study intersections are currently older model Type 170 Controllers. Where possible, the City is implementing upgrades to newer Type 2070 Controllers which provides for enhanced real time operation of traffic signal timing. The newer controllers allow LADOT to respond to real time traffic situations by making immediate adjustments to an intersection's signal timing and providing for more efficient traffic flows.

The project shall fund the upgrade of the signal controllers at the following intersection locations:

- Intersection No. 14: Main Street & 17th Street
- Intersection No. 15: Los Angeles Street & 17th Street
- Intersection No. 61: Los Angeles Street & 16th Street

Monitoring Phase: Construction
Enforcement Agency: Los Angeles Department of Transportation (LADOT)
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once prior to occupancy
Action Indicating Compliance: Field inspection sign-off and compliance certification report submitted to LADOT by project contractor

MM-TR-10: ***Closed Circuit Television (CCTV) Cameras:*** An integral part of the City's ATSAC/ATCS traffic signal control system is CCTV cameras at key intersection locations. These provide visual information to the City's ATSAC Traffic Control Center, and allow LADOT to monitor traffic operations and respond in real time to traffic conditions that delay vehicles and transit service.

The project shall fund the installation of new CCTV cameras (including necessary mounting poles, fiber optic and electrical connections) at the following locations:

- Intersection No. 13: Broadway & 17th Street
- Intersection No. 37: Adams Boulevard & Figueroa Street
- Intersection No. 41: Adams Boulevard & Broadway
- Intersection No. 57: Venice Boulevard & Figueroa Street

- Intersection No. 59: Venice Boulevard & Grand Avenue

Monitoring Phase: Construction
Enforcement Agency: Los Angeles Department of Transportation (LADOT)
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once prior to occupancy
Action Indicating Compliance: Field inspection sign-off and compliance certification report submitted to LADOT by project contractor

MM-TR-11: ***System Detection Loops:*** Another integral part of the City's ATSAC/ATCS traffic signal control system is system detection loops at key intersection locations. These provide real-time information to the City's ATSAC Traffic Control Center, and allow LADOT to monitor traffic operations and respond in real time to traffic conditions that delay vehicles and transit service.

The project would fund the installation of new system detection loops (including necessary fiber optic and electrical connections) at the following locations:

- Intersection No. 21: Los Angeles Street & 18th Street

- Intersection No. 61: Los Angeles Street & 16th Street

The locations for traffic signal upgrades, CCTV cameras, and system detector loops have been agreed to by LADOT. The applicant will either install the upgrades or pay LADOT a fixed amount of $210,000 to provide for LADOT to design and install the improvements.

Monitoring Phase: Construction
Enforcement Agency: Los Angeles Department of Transportation (LADOT)
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once prior to occupancy
Action Indicating Compliance: Field inspection sign-off and compliance certification report submitted to LADOT by project contractor

MM-TR-12: Vehicle trip reduction measures are proposed to encourage the use of non-auto modes and reduce vehicle trips. These measures shall be implemented as each parcel of the project site is developed. The financial contribution to LADOT for the Mobility Hub shall be implemented when project development has occurred to reach 40% of the total project PM peak hour trips. The financial contribution to the City's Bicycle Trust Fund should be implemented

when project development has occurred to reach 50% of the total project PM peak hour trips. These measures include the following:

- Provide sidewalk bike racks on the project site, including areas near bus stops.
- Coordinate with LADOT to provide the physical space (approximately 1,000 square feet rent free in a strategic location visible to the public) for a Mobility Hub/Bikeshare Station at the project site that could include space for:
    - secure, long-term parking;
    - maintenance and repair, and/or potential small Bicycle Store; and/or
    - area for bike share.

- Make a one-time financial contribution of $250,000 to the City of Los Angeles Department of Transportation, the monies to be used in the implementation of the Mobility Hub on the site of the project.
- Make a one-time financial contribution of $250,000 to the City's Bicycle Trust Fund, the monies to be used to improve bicycle facilities in the area of the project.
- Participate in a Car-Share Program, and provide a minimum of 10 (ten) off-street car share parking spaces in the project's parking garage.
- Facilitate rideshare through an on-site transportation coordinator.
- Facilitate carpools and vanpools for project employees, students, etc., by providing priority locations for carpool and vanpool parking.
- Provide on-site facility with information on car-sharing, vanpools, taxis (e.g. kiosk, concierge, or transportation office).
- Provide emergency or late-night ride homes for transit users or carpoolers who reasonably and unexpectedly leave work early or late and can't take bus/train/carpool.

A preliminary TDM program, which includes but is not limited to the program listed above should be prepared and provided for DOT review, prior to the issuance of the first building permit for this project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the project. The "transit enhancements" listed in MM-TR-13 also include some traditional TDM measures including financial incentive programs that should be included in the project's ultimate TDM plan.

Monitoring Phase: Construction of Individual Parcels; At 40% of Total PM Peak

Hour Trips; At 50 % of Total PM Peak Hour Trips

Enforcement Agency: Los Angeles Department of Transportation (LADOT)
Monitoring Agency: Department of City Planning
Monitoring Frequency: Periodic field inspections
Action Indicating Compliance: Field inspection sign-off

MM-TR-13: The project shall incorporate the following mitigation measures to encourage the use of transit and reduce vehicle trips. These measures shall be implemented as each parcel of the project site is developed. The financial contribution to LADOT for the DASH Bus shall be implemented at the first occupancy of development on the East Block of the project.

- Provide transit information center/concierge/store/kiosks on-site (include sale of transit passes).
- Encourage bus shelters in area of the project site, as determined by Metro.
- Unbundle parking from housing cost.
- Implement parking cash-out programs for project land uses as appropriate.
- Make a one-time financial contribution of $500,000 to LADOT for the purchase of one DASH bus, to facilitate modifying slightly the route of Route D to include the project site. LADOT to pay for the operating costs of the vehicle.

Monitoring Phase: Construction of Individual Parcels; At Occupancy of East Block
Enforcement Agency: Los Angeles Department of Transportation (LADOT)
Monitoring Agency: Department of City Planning
Monitoring Frequency: Periodic field inspections
Action Indicating Compliance: Field inspection sign-off

MM-TR-14: The project shall install a new traffic signal on Main Street at the main project driveway midblock between Washington Boulevard and 21st Street. Installation of a signal at this location would also entail modifications to the driveways for the Sports Museum on the east side of Main Street, opposite the project site. The Sports Museum currently has two driveways on Main Street. The northernmost of the two driveways is presently configured for inbound traffic, and the southernmost driveway is presently configured for outbound traffic. The existing south driveway of the Sports Museum would be closed, and a new driveway would be provided as the east leg of the new traffic signal, with full turning movements provided to access both the project and the Sports Museum. The existing north Sports Museum driveway on Main Street would not be modified by the project, and could remain as a right turn-in driveway. The existing Sports Museum driveway on

Washington Boulevard would not be modified by the project, and would remain as a right turn-out driveway.

Monitoring Phase: Construction
Enforcement Agency: Los Angeles Department of Transportation (LADOT)
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once prior to occupancy

Action Indicating Compliance: Field inspection sign-off and compliance Certification report submitted to LADOT by project contractor

Utilities/Sewer

Project Design Feature

PDF-UT-1: The project shall implement the water-conserving project design features listed in Section IV.O.2 of this EIR, which will also reduce wastewater generation.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once, prior to issuance of building permits
Action Indicating Compliance: Issuance of building permits

Utilities/Water

Project Design Features

PDF-UT-2: The project would implement the following Project Design Features (PDFs) to reduce water consumption. These measures are in addition to those required by codes and ordinances that would be applicable to the project:

- High Efficiency Toilets with flush volume of 1.0 gallons of water per flush
- Kitchen Faucets with flow rate of 1.5 gallons per minute or less
- High Efficiency Clothes Washers (Residential) – water factor of 4.0 or less.
- Waterless Urinals
- Showerheads with flow rate of 1.5 gallons per minute or less
- Rotating Sprinkler Nozzles for Landscape Irrigation – 0.5 gallons per minute
- Drought Tolerant Plants – 70% of total landscaping
- High Efficiency Clothes Washers (Commercial) – water factor of 4.5 or less
- Cooling Tower Conductivity Controllers or Cooling Tower pH

Conductivity Controllers
- Water-Saving Pool Filter
- Leak Detection System for swimming pools and Jacuzzi
- Drip/ Subsurface Irrigation (Micro-Irrigation)
- Micro-Spray
- Proper Hydro-zoning (groups plants with similar water requirements together)
- Zoned Irrigation
- Water Conserving turf (3,325 square feet of turf with 0.7 plant factor)

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once, prior to issuance of building permits
Action Indicating Compliance: Issuance of building permits

PDF-UT-3: The project applicant shall complete a LEED Checklist, and submit to the Department of City Planning for review, prior to issuance of building permits.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once, prior to issuance of building permits
Action Indicating Compliance: Department of City Planning sign off of reviewed checklist

Utilities/Solid Waste

Project Design Feature

PDF-UT-4: During occupancy and operations, the project shall have a solid waste diversion rate target of 50 percent of non-hazardous materials.

Monitoring Phase: Operations
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning
Monitoring Frequency: Field inspection(s) following construction
Action Indicating Compliance: Field inspection sign-off

Utilities/Electricity

Project Design Feature

PDF-UT-5: The project applicant shall complete a LEED Checklist, and submit to the Department of City Planning for review, prior to issuance of building permits.

Monitoring Phase: Construction
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once, prior to issuance of building permits
Action Indicating Compliance: DCP sign off of reviewed checklist

Utilities/Natural Gas

Project Design Features

PDF-UT-6: The project would include the following Project Design Features:

- The applicant shall comply with State Energy Conservation Standards for New Residential and Non-Residential Buildings (Title 24, Part 6, Article 2, California Administrative Code, 2008) and exceed Title 24, Part 6, Article 2, California Administrative Code, 2005 by 15 percent.
- The applicant shall install energy efficient heating and cooling systems, appliances (e.g., Energy Star®), equipment, and control systems.
- The applicant shall specify low-flow water-usage fixtures, reducing water consumption and water heating fuel (natural gas)
- The applicant shall use energy-efficient pumps and motors for, waste and storm water conveyance, fire water, and domestic water.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once, prior to issuance of building permits
Action Indicating Compliance: Issuance of building permits

PDF-UT-7: The project applicant shall complete a LEED Checklist, and submit to the Department of City Planning for review, prior to issuance of building permits.

Monitoring Phase: Pre-Construction
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning
Monitoring Frequency: Once, prior to issuance of building permits
Action Indicating Compliance: DCP sign off of reviewed checklist

30. **Construction Mitigation Conditions** - Prior to the issuance of a grading or building permit, or the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:

CM-1. That a sign be required on site clearly stating a contact/complaint telephone number that provides contact to a live voice, not a recording or voice mail, during all hours of construction, the construction site address, and the tract map number. YOU ARE REQUIRED TO POST THE SIGN 7 DAYS BEFORE CONSTRUCTION IS TO BEGIN.

a. Locate the sign in a conspicuous place on the subject site or structure (if developed) so that the public can easily read it. The sign must be sturdily attached to a wooden post if it will be freestanding.

b. Regardless of who posts the site, it is always the responsibility of the applicant to assure that the notice is firmly attached, legible, and remains in that condition throughout the entire construction period.

c. If the case involves more than one street frontage, post a sign on each street frontage involved. If a site exceeds five (5) acres in size, a separate notice of posting will be required for each five (5) acres, or portion thereof. Each sign must be posted in a prominent location.

CM-2. All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.

CM-3. The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by construction and hauling, and at all times provide reasonable control of dust caused by wind.

CM-4. All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.

CM-5. All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.

CM-6. All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.

CM-7. General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.

CM-8. The project shall comply with the City of Los Angeles Noise Ordinance Nos. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

CM-9. Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday.

CM-10. Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

CM-11. The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

CM-12. The project sponsor shall comply with the Noise Insulation Standards of Title 24 of the California Code Regulations, which insure an acceptable interior noise environment.

CM-13. Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), construct diversion dikes to channel runoff around the site. Line channels with grass or roughened pavement to reduce runoff velocity.

CM-14. Incorporate appropriate erosion control and drainage devices to the satisfaction of the Building and Safety Department shall be incorporated, such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned. These will shield and bind the soil.

CM-15. Stockpiles and excavated soil shall be covered with secured tarps or plastic sheeting.

CM-16. All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, wood, and vegetation. Non recyclable materials/wastes must be taken to an

appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.

CM-17. Clean up leaks, drips and spills immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.

CM-18. Do not hose down pavement at material spills. Use dry cleanup methods whenever possible.

CM-19. Cover and maintain dumpsters. Place uncovered dumpsters under a roof or cover with tarps or plastic sheeting.

CM-20. Use gravel approaches where truck traffic is frequent to reduce soil compaction and limit the tracking of sediment into streets.

CM-21. Conduct all vehicle/equipment maintenance, repair, and washing away from storm drains. All major repairs are to be conducted off-site. Use drip pans or drop cloths to catch drips and spills.

DEPARTMENT OF CITY PLANNING - STANDARD COMMERCIAL CONDOMINIUM CONDITIONS

CC-1. Prior to obtaining any grading or building permits before the recordation of the final map, a landscape plan, prepared by a licensed landscape architect, shall be submitted to and approved by the Advisory Agency in accordance with CP-6730.

In the event the subdivider decides not to request a permit before the recordation of the final map, a covenant and agreement satisfactory to the Advisory Agency guaranteeing the submission of such plan before obtaining any permit shall be recorded.

CC-2. In order to expedite the development, the applicant may apply for a building permit for a commercial/residential building. However, prior to issuance of a building permit for a commercial/residential building, the registered civil engineer, architect or licensed land surveyor shall certify in a letter to the Advisory Agency that all applicable tract conditions affecting the physical design of the building and/or site, have been included into the building plans. Such letter is sufficient to clear this condition. In addition, all of the applicable tract conditions shall be stated in full on the building plans and a copy of the plans shall be reviewed and approved by the Advisory Agency prior to submittal to the Department of Building and Safety for a building permit.

OR

If a building permit for a commercial/residential building will not be requested, the project civil engineer, architect or licensed land surveyor must certify in a letter to

the Advisory Agency that the applicant will not request a permit for a commercial/residential building and intends to acquire a building permit for a condominium building(s). Such letter is sufficient to clear this condition.

BUREAU OF ENGINEERING - STANDARD CONDITIONS

S-1. (a) That the sewerage facilities charge be deposited prior to recordation of the final map over all of the tract in conformance with Section 64.11.2 of the LAMC.

(b) That survey boundary monuments be established in the field in a manner satisfactory to the City Engineer and located within the California Coordinate System prior to recordation of the final map. Any alternative measure approved by the City Engineer would require prior submission of complete field notes in support of the boundary survey.

(c) That satisfactory arrangements be made with both the Water System and the Power System of the Department of Water and Power with respect to water mains, fire hydrants, service connections and public utility easements.

(d) That any necessary sewer, street, drainage and street lighting easements be dedicated. In the event it is necessary to obtain off-site easements by separate instruments, records of the Bureau of Right-of-Way and Land shall verify that such easements have been obtained. The above requirements do not apply to easements of off-site sewers to be provided by the City.

(e) That drainage matters be taken care of satisfactory to the City Engineer.

(f) That satisfactory street, sewer and drainage plans and profiles as required, together with a lot grading plan of the tract and any necessary topography of adjoining areas be submitted to the City Engineer.

(g) That any required slope easements be dedicated by the final map.

(h) That each lot in the tract complies with the width and area requirements of the Zoning Ordinance.

(i) That 1-foot future streets and/or alleys be shown along the outside of incomplete public dedications and across the termini of all dedications abutting unsubdivided property. The 1-foot dedications on the map shall include a restriction against their use of access purposes until such time as they are accepted for public use.

(j) That any 1-foot future street and/or alley adjoining the tract be dedicated for public use by the tract, or that a suitable resolution of acceptance be transmitted to the City Council with the final map.

(k) That no public street grade exceeds 15%.

(l) That any necessary additional street dedications be provided to comply with the Americans with Disabilities Act (ADA) of 1990.

S-2. That the following provisions be accomplished in conformity with the improvements constructed herein:

(a) Survey monuments shall be placed and permanently referenced to the satisfaction of the City Engineer. A set of approved field notes shall be furnished, or such work shall be suitably guaranteed, except where the setting of boundary monuments requires that other procedures be followed.

(b) Make satisfactory arrangements with the Department of Transportation with respect to street name, warning, regulatory and guide signs.

(c) All grading done on private property outside the tract boundaries in connection with public improvements shall be performed within dedicated slope easements or by grants of satisfactory rights of entry by the affected property owners.

(d) All improvements within public streets, private street, alleys and easements shall be constructed under permit in conformity with plans and specifications approved by the Bureau of Engineering.

(e) Any required bonded sewer fees shall be paid prior to recordation of the final map.

S-3. That the following improvements be either constructed prior to recordation of the final map or that the construction be suitably guaranteed:

(a) Construct on-site sewers to serve the tract as determined by the City Engineer.

(b) Construct any necessary drainage facilities.

(c) Install street lighting facilities to serve the tract as required by the Bureau of Street Lighting.

Construct new street lights: two (2) on 21st Street and two (2) on Washington Boulevard. If street widening per Bureau of Engineering

improvement conditions, relocate and upgrade street lights; eight (8) on Hill Street, sixteen (16) on Broadway, seven (7) on Main Street, and six (6) on Washington Boulevard.

Notes: The quantity of street lights identified may be modified slightly during the plan check process based on illumination calculations and equipment selection.

Conditions set: 1) in compliance with a Specific Plan, 2) by LADOT, or 3) by other legal instrument excluding the Bureau of Engineering conditions, requiring an improvement that will change the geometrics of the public roadway or driveway apron may require additional or the reconstruction of street lighting improvements as part of that condition.

(d) Plant street trees and remove any existing trees within dedicated streets or proposed dedicated streets as required by the Street Tree Division of the Bureau of Street Maintenance. All street tree plantings shall be brought up to current standards. When the City has previously been paid for tree planting, the subdivider or contractor shall notify the Street Tree Division (213-485-5675) upon completion of construction to expedite tree planting.

(e) Repair or replace any off-grade or broken curb, gutter and sidewalk satisfactory to the City Engineer.

(f) Construct access ramps for the handicapped as required by the City Engineer.

(g) Close any unused driveways satisfactory to the City Engineer.

(h) Construct any necessary additional street improvements to comply with the Americans with Disabilities Act (ADA) of 1990.

(i) That the following improvements be either constructed prior to recordation of the final map or that the construction be suitably guaranteed:

b. Improve all the dedicated corner cuts by placing additional concrete for sidewalk area purposes including any necessary removal and reconstruction of the existing improvements satisfactory to the City Engineer.

NOTES:

The Advisory Agency approval is the maximum number of units permitted under the tract action. However the existing or proposed zoning may not permit this number of units.

Approval from Board of Public Works may be necessary before removal of any street trees in conjunction with the improvements in this tract map through Bureau of Street Services Urban Forestry Division.

Satisfactory arrangements shall be made with the Los Angeles Department of Water and Power, Power System, to pay for removal, relocation, replacement or adjustment of power facilities due to this development. The subdivider must make arrangements for the underground installation of all new utility lines in conformance with LAMC Section 17.05-N.

The final map must record within 36 months of this approval, unless a time extension is granted before the end of such period.

The Advisory Agency hereby finds that this tract conforms to the California Water Code, as required by the Subdivision Map Act.

The subdivider should consult the Department of Water and Power to obtain energy saving design features which can be incorporated into the final building plans for the subject development. As part of the Total Energy Management Program of the Department of Water and Power, this no-cost consultation service will be provided to the subdivider upon his request.

FINDINGS OF FACT (CEQA)

I. INTRODUCTION

The Environmental Impact Report (EIR), consisting of the Draft EIR and the Final EIR, is intended to serve as an informational document for public agency decision-makers and the general public regarding the objectives and components of the project at 1900 South Broadway, Los Angeles. PHR LA MART LLC (applicant) filed a Master Land Use Application with the City of Los Angeles (City) on May 1, 2014.

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 CEQA. The City prepared an Initial Study in accordance with Section 15063(a) of the State CEQA Guidelines. Pursuant to the provisions 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 30-day period

commencing on July 16, 2014 and ending August 15, 2014. 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 July 30, 2014, to further inform the 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 nine public agencies. Also, written comments were provided by three interested organizations and/or individuals via mail, e-mail or submittal at the NOP scoping meeting. The NOP letters and comments received during the comment period, as well as comment sheets from the public scoping meeting, are included in Appendices I-2 and I-3 of the Draft EIR.

The Draft EIR evaluated in detail the potential effects of the project. It also analyzed the effects of a reasonable range of five alternatives to the project, including a “No Project” alternative. The Draft EIR for the project (State Clearinghouse No. 2014071054), incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and 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 47-day public comment period beginning on September 17, 2015, and ending on November 2, 2015, beyond the 45 days required by CEQA Guidelines Section 15105(a). Copies of the written comments received are provided in the Final EIR. Pursuant to Section 15088 of the CEQA Guidelines, the City, 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 June 10, 2016, 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 project. The Final EIR addresses the environmental effects associated with implementation of the 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 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, or provided comments during the NOP comment period.

A duly noticed public hearing for the project was held by the Hearing Officer/Deputy

Advisory Agency on behalf of the City Planning Commission on June 21, 2016.

The documents and other materials that constitute the record of proceedings on which the City's 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).

III. FINDINGS REQUIRED TO BE MADE BY LEAD AGENCY UNDER CEQA

Section 21081 of the California Public Resources Code and Section 15091 of the State CEQA Guidelines (the "Guidelines) require a public agency, prior to approving a project, to identify significant impacts and make one or more of three possible findings for each of the significant impacts.

A. The first possible finding is that "[c]hanges or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (Guidelines Section 15091 (a)(1)); and

B. The second possible finding is that "[s]uch changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency." (Guidelines Section 15091(a)(2)); and

C. The third possible finding is that "[s]pecific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible, the mitigation measures or Project alternatives identified in the final EIR." (Guidelines, Section 15091(a)(3)).

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Final EIR for the project as fully set forth therein. Section 15091 of the CEQA Guidelines requires findings to address environmental impacts that an EIR identifies as "significant." For each of the significant impacts associated with the project, either before or after mitigation, the following sections are provided:

1. Description of Significant Effects – A specific description of the environmental effects identified in the EIR, including a judgment regarding the significance of the impact;

2. Project Design Features – Reference to the identified Project Design Features that are a part of the project (numbering of the features corresponds to the numbering in the Draft EIR);

3. Mitigation Measures – Reference to the identified mitigation measures or actions that are required as part of the project (numbering of the mitigation measures correspond to the Mitigation Monitoring Program, which is included as Section V of the Final EIR);

4. Finding – One or more of the three specific findings in direct response to CEQA Section 21081 and CEQA Guidelines Section 15091;

5. Rationale for Finding – A summary of the reasons for the finding(s);

6. Reference – A notation on the specific section in the Draft EIR which includes the evidence and discussion of the identified impact.

IV. DESCRIPTION OF THE PROJECT

The project involves the construction of a mixed-use development consisting of: 1,444 residential condominiums; 950 commercial condominiums; a 208-key hotel; 67,702 square feet of retail/restaurant uses; a 29,355 square-foot grocery store; a 17,507 square-foot gallery; and a 7,879 square-foot fitness studio. The project includes maintenance of the existing 861,162 square-foot, 12-story Reef building with 8,000 square feet of restaurant and outdoor space added to the rooftop. The development consists of a 35-story residential tower, a 32-story residential tower, a 19-story hotel tower, and multiple low- and mid-rise residential buildings ranging in height from 88 feet up to 420 feet. A total of 2,512 parking spaces and 1,906 bicycle parking spaces are provided. The project FAR is 6.0:1.

V. ENVIRONMENTAL IMPACTS FOUND NOT TO BE SIGNIFICANT OR LESS THAN SIGNIFICANT BY THE INITIAL STUDY

The City Planning Department prepared an Initial Study dated July 16, 2014. The Initial Study is located in Appendix I-1 of the Draft EIR. The Initial Study found the following environmental impacts not to be significant or less than significant:

A. Agricultural and Forest Resources
   1. Farmland
   2. Existing Zoning for Agricultural Use or Williamson Act Contract
   3. Forest Land or Timberland Zoning
   4. Loss or Conversion of Forest Land
   5. Cumulative Impacts

B. Air Quality
   1. Objectionable Odors

C. Biological Resources

1. Sensitive Biological Species
2. Riparian Habitat and Wetlands
3. Movement of any Resident or Migratory Species
4. Habitat Conservation Plans

D. Geology and Soils
1. Landslides
2. Septic Tanks

E. Hazards and Hazardous Materials
1. Airport Land Use Plans and Private Airstrips
2. Wildland Fires

F. Hydrology and Water Quality
1. 100-Year Flood Hazard Areas and100-year Flood
2. Seiche, Tsunami or Mudflow

G. Land Use and Planning
1. Habitat or Natural Community Conservation Plans

H. Mineral Resources
1. Loss of Availability of Known Mineral Resources
2. Loss of Mineral Resources Recovery Site
3. Cumulative Impacts

I. Noise
1. Airport Land Use Plans
2. Private Airstrips

J. Population and Housing
1. Displacement of Existing Housing
2. Displacement of Existing Residents

K. Recreation
1. Recreational Facilities

L. Transportation/Circulation
1. Air Traffic Patterns

VI. ENVIRONMENTAL IMPACTS FOUND NOT TO BE SIGNIFICANT PRIOR TO MITIGATION

The following impact areas were determined to be less than significant, and based on that analysis and other evidence in the administrative record relating to the project, the City finds and determines that the following environmental impact

categories will not result in any significant impacts and that no mitigation measures are needed:

A. Aesthetics

1. Visual Character/Quality

Operational Impacts (Except Vertical Zone 3 Signage): Under the project, the height of the Reef building would remain the same. Except for the project's two high rise towers, the remainder of the development consists of mid-rise buildings varying in height between 6 and 7 stories, consistent with or lower than the height and mass of other visually prominent buildings in the surrounding area like the 14-story commercial building to the north across Washington Boulevard and the 8-story courthouse across Hill Street to the west. In addition, the project replaces underutilized surface parking lots with a high-intensity, pedestrian-oriented urban center that is consistent with the visual character of the existing urbanized area. The project's creation of an transit-oriented development is also consistent with the goals to concentrate development near transit station areas stated in the General Plan Framework, the Southeast Los Angeles Community Plan, the Draft/Proposed Southeast Los Angeles Community Plan, the Council District 9 Redevelopment Plan, the Downtown Housing Incentive area, the Central City Revitalization Zone, and the Los Angeles State Enterprise Zone. The overall effect of the project is to create an urban center by improving the current appearance of the project site, while also providing a pedestrian-oriented experience. Thus, the height and massing and architectural and urban design of the project are appropriate within the context of both existing and contemplated development patterns in the area. Therefore, there is a less-than-significant impact.

The Signage Supplemental Use District (SUD) analyzed in the Draft EIR includes the maximum amount of signage originally proposed, including allows large scale signage in designated locations within the project site. The effect of the signage permitted by the SUD is to reinforce and contribute to the visual character of the urban center created by the project. Potential impacts of this signage depend upon several factors, including the size, height, and location of signs, the level of lighting and animation permitted, along with the concentration of signage (i.e., the location of multiple signs within the same area), and the locations of sensitive receptors relative to the signs. Specifically, the Draft EIR identifies five Sign Zones and three Vertical Sign Zones and the permitted signs that are allowed in each zone. To assess potential visual impacts, the Draft EIR evaluates all signs from representative vantage points around the project site as well as the light impacts of the entire signage program. In addition, for a more accurate measure, the Draft EIR analyzes the different sign types based on their individual characteristics. To reduce potential impacts, the SUD analyzed in the Draft EIR limits or prohibits certain signage that might impact sensitive receptors and limits both the size and permitted animation of the north-facing signage on the North Tower in Vertical Zone 1 and 2, immediately across Washington Boulevard from the Rutland

Apartments. West-facing, highly animated signage in Vertical Zone 1 and 2, immediately adjacent to sensitive receptors, is also prohibited.

The signage program analyzed in the Draft EIR also has a less-than-significant impact on nearby freeways. Specifically, views of project signage from southbound and northbound traffic on the I-110 are intermittent and distant and are therefore not prominent and only visible for a short duration. As such, project signage does not represent a safety hazard for traffic on the I-110 freeway. The views of the project site from the westbound I-10 freeway are oblique and the signage complies with Section 21466.5 of the California Motor Vehicle Code (CMVC). The CMVC identifies thresholds when light sources can become distracting to divers. Therefore, because the project signage from the westbound freeway does not exceed the thresholds of the CMVC, the project does not pose a safety hazard to motorists. From the eastbound I-10 freeway, the high-rise buildings of the project first become visible at approximately Hoover Street, approximately 5,500 feet from the project site. At this distance, the project site can be seen among the landscaping adjacent to the freeway. A view of the project site continues to be available until the freeway passes the project site, for a distance of approximately 6,200 feet (approximately 1.2 miles). Throughout this distance, the view to the project site is always at an oblique angle to the driver's right. The signage viewed from the eastbound freeway traffic also complies with the governing requirements provided in the CMVC, and, therefore, the project does not impair motorists. The Draft EIR analysis of the impacts from the different views and from the signage program as a whole are incorporated into these Findings. In summary, while impacts associated with Vertical Zone 3 signage are significant and unavoidable, impacts associated with the remaining signage are less than significant.

Since the Final EIR was prepared, changes were incorporated into the project's signage program that reduce the permitted signage from the original proposal. As set forth below, these changes would not result in new significant environmental effects, or substantial increase in the severity of environmental effects that were previously disclosed in the Draft and Final EIR. The total proposed signage has been reduced by 164,789 square feet in size from 234,067 square feet to 69,278 square feet (collectively, Reduced Signage Program).

The City Council has enacted The Reef Transit-Oriented Sign District (Sign Ordinance) pursuant to the provisions of Section 13.11 of the Los Angeles Municipal Code (LAMC). The Sign Ordinance adopts a reduced signage program that reflects substantial changes in the signage that would be permitted on the project site, as compared to the parameters outlined in the Draft EIR. Notably, the total amount of signage permitted by the Reduced Signage Program is reduced by 70 percent compared to what was analyzed in the Draft EIR, from a total of 234,067 square feet to a total of 69,278 square feet of signs permitted under the Reduced Signage Program. Further, the number of large signs permitted by the reduced signage program was reduced from six to three, and all three large signs are to be located on the existing Reef building. The previously proposed signs on the north

and east facades of the North Tower, and the north façade of the South Tower would not be permitted under the Reduced Signage Program. No Vertical Sign Zone 3 signage would be permitted on the project site, except on the existing Reef building and the hotel building.

Under the Reduced Signage Program, the large signs on the existing Reef building are approved as follows:

Reef Building
- North Elevation – 24,202 sq. ft. to 13,887 sq. ft. (43% reduction)
- East Elevation – 23,050 sq. ft. to 13,665 sq. ft. (41% reduction)
- West Elevation – 23,050 sq. ft. to 13,665 sq. ft. (41% reduction)

Under the Reduced Signage Program, the shape of the signage on the North Elevation of the existing Reef building was changed slightly, to rectangular in shape, whereas the Draft EIR showed this sign following the roof line of the existing Reef building, resulting in a “notch” in the middle of the sign.

In addition, Vertical Sign Zone 3 signage on the hotel building was reduced from 14,520 square feet to a maximum of 8,580 square feet, a 41% reduction compared to the Draft EIR analysis.

The permitted digital signage in Vertical Sign Zone 3 signs under the Reduced Signage Program is the same as permitted and analyzed in the Draft EIR. The operating hours of Limited Animation I and Controlled Refresh I signage on the existing Reef building are changed to 7:00 a.m. to 11:00 p.m. Sunday through Thursday, and 7:00 a.m. to 12:00 midnight Friday and Saturday.

The Draft EIR analysis of the impacts from the different views are incorporated into these Findings as though fully set forth herein and its conclusions are summarized as follows.

(i) Views of Project Signage from the West - From the areas to the west of the project site, including the Superior Court building, the Los Angeles Trade Technical College (LATTC), Hill Street, and Washington Boulevard, and other streets to the west of the project site, signage located on the west façade of the existing Reef building, the west façade of the North Tower, the west façade of the South Tower, and the west façade of the Hotel will be visible. Signage presently visible from these locations includes building and tenant identification signs associated with surrounding land uses, and a small number of billboards.

The Vertical Zone 2 signage on the North and South Towers will be less prominent and visible because they will be visible from a lesser distance due to placement at a lower elevation and lower permitted animation levels. Also, views of this signage will be blocked from some locations, such as Hill Street, the Superior Court building and LATTC, by project buildings, including the existing Reef building, the hotel

building, and the residential buildings on the southeastern edge of the West Block. The Vertical Zone 2 signage on the existing Reef building will be directly visible from locations to the west of the project site. This signage will be less prominent because of the limited animation permitted. Views of Vertical Zone 1 signage are limited to the streets and sidewalks located at the western edge of the project site, and from Broadway. Impacts of permitted Vertical Zone 2 signage will be less than significant because this signage will be visible and prominent only in the immediate vicinity of the project site. In addition, no west-facing, highly animated signage in Vertical Zone 2 or 1 immediately adjacent to sensitive receptors (where they could adversely affect the visual environment as observed from these receptors) are not permitted. Accordingly, the aesthetic/visual quality impacts of west-facing signage in Vertical Zone 2 will be less than significant. Signage in Vertical Zone 1 will be at a lower elevation and Vertical Zone 2 signs will have the same prohibition on highly animated signage immediately adjacent to sensitive receptors. Therefore, impacts of permitted Vertical Zone 1 signage will also be less than significant. Accordingly, except for Vertical Zone 3 signage, the project signage viewed from the West will have a less than significant visual character and quality impact.

(ii) Views of Project Signage from the North - From the areas to the north of the project site, including the 14-story commercial building, Rutland Apartments, Washington Boulevard, Hill Street, Broadway and Main Street, signage located on the north façade of The Reef, the north façade of the North Tower, the north façade of the South Tower, and the north façade of the Hotel will be visible. Signage presently visible from these locations includes building and tenant identification signs associated with existing land uses, and a small number of billboards.

The Vertical Zone 2 signage on the existing Reef building will be directly visible from locations to the north of the project site. This signage will be less prominent because of the limited animation permitted. Views of Vertical Zone 1 signage will be limited to the streets and sidewalks located at the northern edge of the project site. Impacts of permitted Vertical Sign Zone 2 signage will be less than significant because this signage will be visible and prominent only in the immediate vicinity of the project site. In addition, north-facing, highly animated signage in Vertical Zone 2 immediately adjacent to sensitive receptors (where they could adversely affect the visual environment as observed from these receptors) are not permitted. North-facing signage on the North Tower in Vertical Zone 2 and 1 immediately across the street from the Rutland Apartments is limited to 3,840 square feet in size. Accordingly, the aesthetic/visual quality impacts of north-facing signage in Vertical Zone 2 will be less than significant. Impacts of permitted Vertical Zone 1 signage will also be less than significant because this signage would be limited to 3,072 in total area, and will be visible and prominent only in the immediate vicinity of the project site and not contain highly animated signage immediately adjacent to sensitive receptors. Accordingly, except for Vertical Zone 3 signage, the project signage viewed from the North will have a less than significant visual character and quality impact.

(iii) Views of Project Signage from the East - From the areas to the east of the project site, including the L.A. Sports Museum, Santee Education Complex and Frida Kahlo Continuation High School, Washington Boulevard and Main Street, signage located on the east façade of the existing Reef building, the east façade of the North Tower, and the east façade of the Hotel will be visible. Signage presently visible from these locations includes building and tenant identification signs associated with existing uses, and a small number of billboards.

The Vertical Zone 2 signage on the North Tower will be directly visible from locations to the east of the project site. Views of Vertical Zone 2 signage on the existing Reef building from locations to the east of the project site will be blocked from some locations, such as Main Street, the L.A. Sports Museum and the schools, by project buildings, including the North Tower, and the residential and retail buildings on the eastern edge of the East Block. This signage will be less prominent because of the limited animation permitted. Views of Vertical Zone 1 signage will be limited to the streets and sidewalks located at the eastern edge of the project site. Impacts of permitted Vertical Sign Zone 2 signage will be less than significant because this signage will be visible and prominent only in the immediate vicinity of the project site. In addition, east-facing, highly animated signage in Vertical Zone 2 and 1 immediately adjacent to sensitive receptors (where they could adversely affect the visual environment as observed from these receptors) are not permitted. Accordingly, the aesthetic/visual quality impacts of east-facing signage in Vertical Zone 2 will be less than significant. Impacts of permitted Vertical Zone 1 signage will be less than significant because this signage is limited to less than 5,300 square feet in total area on the North and South Towers, respectively, and will be visible and prominent only in the immediate vicinity of the project site and not contain highly animated signage immediately adjacent to sensitive receptors. Accordingly, except for Vertical Zone 3 signage, the project signage viewed from the east will have a less than significant visual character and quality impact.

(iv) Views of Project Signage from the South - From the areas to the south of the project site, including the residential neighborhood to the southeast, and the commercial/industrial area, with limited residential uses, Main Street, Broadway, Hill Street, 21st Street, and other streets to the south of the project site, signage located on the south façade of the Hotel will be visible. Very little signage is presently visible from these locations, limited to building and tenant identification signs associated with existing uses, and a small number of billboards.

Impacts of permitted Vertical Zone 1 signage will be less than significant because this signage will be limited to 3,072 square feet on the Hotel, and 2,185 square feet on the South Tower, and will be visible and prominent only in the immediate vicinity of the project site. In addition, large areas of south-facing, highly animated signage in Vertical Zone 1 immediately adjacent to sensitive receptors (where they could adversely affect the visual environment as observed from these receptors) are not allowed. Accordingly, except for Vertical Zone 3 signage, the project

signage viewed from the South will have a less than significant visual character and quality impact.

(v) Views from I-110 Freeway - For vehicles travelling southbound on the I-110 freeway through downtown Los Angeles, the project will not be visible until the driver is past LA Live, because of the existing buildings located immediately adjacent to the freeway which blocks views in the direction of the project site. Once past LA Live, the tops of project high rise buildings may be visible over the Convention Center at a distance of approximately 5,000 feet, for a length of approximately 3,200 feet, at which point the I-110 freeway crosses under the I-10 freeway. This travel path will include a brief view of the two signs on the north facades of the North and South Towers, and the hotel identification signage on the top of the hotel building. After this underpass, intermittent views of the project site are available for approximately 800 feet, which will include the signage at the top of the hotel building, followed by clearer views of the project site for an additional approximately 800 feet, encompassing the hotel building signage and the signage on the west façade of the existing Reef building, at a distance of approximately 2,200 feet. After this, the freeway alignment goes below the ground level, and the project site is not visible. The views to the project site from the southbound I-110, in addition to traffic, will also encompass other buildings, trees, freeway structures, and roadway signs. Accordingly, the views of project signage from this freeway will be intermittent, distant, and, therefore, not prominent, and will only be available for a duration of approximately two minutes for traffic travelling at 30 miles per hour. As such, project signage will not represent a safety hazard for southbound traffic on the I-110 freeway and project impacts will be less than significant.

For vehicles travelling northbound on the I-110 freeway from south of downtown Los Angeles, the project site becomes discernible at a point approximately 1,200 feet south of the Adams Boulevard off-ramp. Prior to this point, the project site will, at most, be viewed as part of the downtown Los Angeles skyline, as the view traveling northbound is affected by sound walls located on the eastern edge of the freeway. From this point, the project site will be visible for no more than 800 feet, and traffic, other buildings, and freeway sound walls will also be located within this field of view. The only signage that will be visible from this location is the hotel identification signage at the top of the hotel building. After this point, the freeway alignment goes below ground level, and the project site is not visible. Accordingly, the views of project signage from this freeway will be limited, both in duration and in visible signage. As such, project signage will not represent a safety hazard for northbound traffic on the I-110 freeway and project impacts will be less than significant.

(vi) Views from I-10 Freeway - From the westbound I-10 freeway, the high rise buildings within the project will first become visible at a distance of approximately 1.5 miles. The view of the project site will be to the driver’s left, across the eastbound traffic lanes. This view will continue to be available up to the point where the freeway passes by the project site, except for a brief period where the

view will be partially blocked by a 6-story concrete building located immediately adjacent to the eastbound freeway lanes at San Pedro Street. As shown in the Draft EIR Figure IV.B-15, no direct, head-on views of the project site are available from the westbound I-10 freeway after the freeway turns to the west approximately 1.5 miles east of the project site (i.e., the view of the project site for westbound traffic on the I-10 will always be oblique). Moreover, driver safety on highways is governed by the California Motor Vehicle Code (CMVC), which identifies when lighting can become distracting to drivers. As analyzed in the Draft EIR, the lighting impacts of project signage will comply with Section 21466.5 of the CMVC, and, therefore, will not pose a safety hazard to motorists and Project impacts will be less than significant.

From the eastbound I-10 freeway, the high rise buildings within the project will first become visible at approximately Hoover Street, at a distance of approximately 5,500 feet from the project site. At this distance, the project site will be seen among the landscaping that is located adjacent to the freeway. A view of the project site will continue to be available until the freeway passes the project site, for a distance of approximately 6,200 feet (approximately 1.2 miles). Throughout this distance, the view to the Project site will always be at an oblique angle to the driver's right. Similar to views of the project Site from the westbound direction, the effect of project buildings and signage on driver safety was evaluated in the Draft EIR in accordance with the governing requirements provided in the CVMC, and the project was determined to not impair motorists on surrounding freeways and, therefore, the project impacts will be less than significant.

(vii) Reduced Signage Program. The Reduced Signage Program would not result in new significant environmental effects, or substantial increase in the severity of environmental effects that were previously disclosed in the Draft EIR. The total proposed signage has been reduced by 164,789 square feet in size from 234,067 square feet to 69,278 square feet. The potential environmental effects of the Reduced Signage Program related to visual quality is lower than what was analyzed in the Draft EIR. The assessment of a significant and unavoidable impact related to Vertical Sign Zone 3 signage in the Draft EIR was based upon the size and animation of the signs. Under the Reduced Signage Program, three Vertical Sign Zone 3 signs on the North Tower and South Tower were removed from the program. Accordingly, the significant and unavoidable visual quality impacts of these signs would be avoided under the Reduced Signage Program. In addition, the impact of the Vertical Sign Zone 3 sign that would have been located on the east façade of the North Tower, which would have been visible from the residential neighborhood located to the southeast of the project site, will be avoided. The Vertical Sign Zone 3 signs on the existing Reef building was reduced in size by approximately 40%. High levels of animation (Controlled Refresh I and Limited Animation I) will continue to be permitted in these signs. Accordingly, the significant and unavoidable visual quality impacts of these signs will be reduced, but not eliminated under the Reduced Signage Program.

Lighting. With respect to the potential for light intensity levels to exceed 2.0 footcandles at any residential property line outside of the project site, an updated lighting report was prepared for the Reduced Signage Program. This report calculated the lighting levels to which the Reduced Signage Program signage would need to be limited in order to ensure that light intensity levels would not exceed 2.0 footcandles at any residential property line outside of the project site. These levels are included as a design condition in the Sign Ordinance that implements the Reduced Signage Program. Accordingly, lighting impacts would remain less than significant under the Reduced Signage Program. With respect to the visibility of signage to freeway drivers, the updated lighting report demonstrates that project's signage is not located within 10 degrees of drivers' lines of sight, and that brightness would exceed allowable levels. Moreover, the removal of the Vertical Sign Zone 3 signage from the North Tower and South Tower reduced the less than significant impacts compared to what was analyzed in the Draft EIR. Accordingly, this impact remains less than significant.

The potential environmental effects of the Reduced Signage Program related to lighting are lower than what was analyzed in the Draft EIR. The significant lighting impact related to Vertical Sign Zone 3 signage on the North and South Towers do not occur under the Reduced Signage Program. This modification in the signage program also avoids the impact of the sign that would have been located on the east façade of the North Tower, which would have been visible from the residential neighborhood located to the southeast of the project site.

Modifications to the existing Reef building signage as contained in the Reduced Signage Program would not result in any new significant impacts, or substantial increase in the severity of previously identified impacts and would reduced some of the less than significant impacts identified in the Draft EIR. Accordingly, recirculation of the EIR to address the changes in the project's signage program is not required.

Operational Impacts (Views and View Corridors): Views from the project site are extremely limited, in particular views of the Hollywood Hills. Therefore, views of the Hollywood Hills are not a valued scenic resource from this area. The project has the potential to obstruct private views from the four-story Da Capo residential building on the northwest corner of Main Street and Washington Boulevard, but views to the south are limited by existing development in the area and consist of an urban landscape containing no substantial visual resources. Therefore, there is a less-than-significant impact.

Cumulative Impacts: The geographic context for the analysis of cumulative aesthetic impacts includes areas with views of the project like portions of Downtown Los Angeles and the Southeast Los Angeles Community Plan Area. Development of the project in combination with the Related Projects results in an intensification of land uses in an already urbanized area of the City. However, anticipated growth would continue to be guided by the General Plan and other

planning tools that anticipate the continued evolution of this area of the City, ensuring protection of the visual character of the area and a less-than-significant impact.

2. Light or Glare

Construction Impacts: Construction could include nighttime activities involving the use of on-site lighting during demolition, excavation, framing, and building construction. Pursuant to the requirements of the LAMC, construction hours would be limited to 7:00 AM to 9:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday. These construction hours are consistent with routine development in an urban area, resulting in a less-than-significant impact.

Operation Glare Impacts: Glare, a condition which causes an observer to experience visual discomfort, can result from high brightness due to the project during operation. The glare impacts from the project are less than significant at all off-site sensitive receptor locations because of project compliance with LAMC Section 93.0117 and PDF-AES-3, which limits brightness to 2.0 foot-candles at sensitive receptors. In addition, the City Council considered an updated lighting report that was prepared for the Reduced Signage Program. This report calculated the lighting levels to which the Reduced Signage Program signage would need to be limited in order to ensure that light intensity levels would not exceed 2.0 footcandles at any residential property line outside of the project site. These levels were included as a design condition in the Sign Ordinance that implements the Reduced Signage Program. Accordingly, impacts would remain less than significant under the Reduced Signage Program. With respect to the visibility of signage to freeway drivers, the updated lighting report demonstrates that Project's signage is not located within 10 degrees of drivers' lines of sight, and that brightness would exceed allowable levels. Moreover, the removal of the Vertical Sign Zone 3 signage from the North Tower and South Tower would reduce the impact compared to what was analyzed in the Draft EIR. In addition, the project will remove existing sources of glare emanating from the surface parking area and the project building and signage are prohibited from using highly reflective building materials. As such, the project results in a less-than-significant glare impact.

Cumulative Impacts: The geographic context for the analysis of cumulative lighting impacts includes areas with views of the project, such as certain portions of Downtown Los Angeles and the Southeast Los Angeles Community Plan Area. The cumulative effect of increased building lighting raises ambient lighting levels, but to levels consistent with an urban area, resulting in a less-than-significant impact.

3. Shade or Shadow

Summer and Winter Shadows and Cumulative Impacts: The project casts far-reaching shadows to the west through the east during the Summer Solstice.

However, no residential building or other sensitive use is shaded by the project for more than four hours, the threshold of significance, between the hours of 9:00 AM and 5:00 PM during the Summer Solstice. The project casts far-reaching shadows to the northwest and northeast during the Winter Solstice. However, no residential building or other sensitive use is shaded by the project for more than three hours, the threshold of significance, between the hours of 9:00 AM and 3:00 PM during the Winter Solstice. Therefore, impacts are less than significant.

Cumulative Impacts: The project site and surrounding area are situated in a mid- to high-density, mixed-use area adjacent to Downtown Los Angeles. Development of the project, in conjunction with the Related Projects, results in an increase of shading impacts in the project vicinity, but not to a level of significance. Therefore, impacts are less than significant.

4. Project Design Features

The City finds that the Project Design Features PDF-AES-1, PDF-AES-2, PDF-AES-3, PDF-AES-4, and PDF-AES-5, incorporated into the project, reduce the potential aesthetics impacts of the project. The Project Design Features were taken into account in the analysis of potential impacts.

B. Air Quality

1. Consistency with Applicable Air Quality Management Plan

The SCAQMD's 2012 Air Quality Management Plan ("AQMP") contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving the National Ambient Air Quality Standards. The project complies with all SCAQMD rules and regulations that are in effect at the time of development. Therefore, impacts are less-than-significant.

2. Violation of Air Quality Standards or Substantial Contribution to Air Quality Violations

Mass Daily Construction Emissions (Except VOC): Based on conservative assumptions, except for VOC, the mass daily construction-related emissions generated during the project construction phase do not exceed the thresholds of significance recommended by the SCAQMD and, therefore, are less than significant.

Mass Daily Operational Emissions (Except VOC and NO_x): With the exception of VOC and NO_x operational emissions, mass daily operational emissions are less than significant because they do not exceed the SCAQMD thresholds of significance. Therefore, impacts would be less than significant.

Mass Daily Construction and Operational Emissions Cumulative Impacts (Except VOC for Construction and Operation and NO_x Operation): Although the mass daily construction-related and operational emissions generated by the project will exceed thresholds of significance recommended by the SCAQMD for VOC (construction and operation) and NO_x (operation), the remaining cumulative impacts will not exceed SCAQMD thresholds and, therefore, are less than significant.

Exposure of Sensitive Receptors to Substantial Pollutant Concentrations: Emissions generated by the project do not expose sensitive receptors in the vicinity of the project site to substantial pollutant concentrations. Therefore, impacts are less than significant.

Toxic Air Contaminants (TACs): The greatest potential for TACs emissions during construction comes from diesel particulate matter emissions associated with heavy-duty equipment during demolition, excavation and grading activities. However, the SCAQMD does not generally consider diesel particulate matter emissions from temporary construction activities to contribute substantially to an incremental increase in diesel-related cancer risks because of the short-term and temporary nature of construction activities. Therefore, impacts are less than significant.

3. Consistency with General Plan Air Quality Element

The project is consistent with the General Plan Air Quality Element of the City's General Plan. Therefore, impacts are less than significant.

4. Project Design Features

The City finds that the Project Design Features PDF-AQ-1, PDF-AQ-2 and PDF-AQ-3, incorporated into the project, reduce the potential Air Quality impacts of the project regarding Consistency with Applicable Air Quality Management Plan, Exposure of Sensitive Receptors to Substantial Pollutant Concentrations, Toxic Air Contaminants, Consistency with General Plan Air Quality Element, and Violation of Air Quality Standards or Substantial Contribution to Air Quality Violations, Mass Daily Construction Emissions (Except VOC), Mass Daily Operational Emissions (Except VOC and NO_x), and Mass Daily Construction and Operational Emissions Cumulative Impacts (Except VOC for Construction and Operation and NO_x for Operation). The Project Design Features were taken into account in the analysis of potential impacts.

C. Biological Resources

1. Trees and Cumulative Impacts

Trees: The project includes the planting of 289 trees, which exceeds the 1:1 ratio for tree replacement identified in the City's tentative tract map guidelines, as well as replacement of all existing trees within the public right-of-way at greater than a 1:1 ratio. Therefore, impacts are less-than-significant.

Cumulative Impacts: It is not known at this time if future development of the Related Projects or other development projects in the City would involve the removal of protected tree species. However, the project will not affect protected tree species, and thus would not contribute to any potential cumulative effect. Therefore, cumulative impacts are less than significant.

D. Cultural Resources

1. Historical Resources

Historical Resources: There is one potential discretionary historic resource located on the project site: the Reef building, originally constructed by the Los Angeles Furniture Makers Association in 1958, and designed by local architect Earl T. Heitschmidt. The Reef building is not designated a landmark at the national, state, or local levels, nor has it been identified or evaluated as significant in any previous historic resource surveys. The building does not appear to be eligible for listing in the National or California Registers or the City designation due to a lack of historical significance and a lack of architectural distinction. Additionally, the Reef building has been altered and no longer retains historic integrity, and it does not appear to contribute to a potential historic district. Therefore, the buildings are not historic resources subject to CEQA. Although it is not known at this time if future development of the related project sites would involve historic resources, it is anticipated that if historic resources are potentially affected, the Related Projects would be subject to the requirements of CEQA and the City's historic resource protection ordinance. It is further anticipated that the effects of cumulative development on historic resources would be mitigated to the extent feasible in accordance with CEQA and other applicable legal requirements. Therefore, cumulative impacts on historical resources are less than significant.

2. Archaeological Resources and Human Remains

According to the South Central Coastal Information Center, although there is one archaeological source (source not assigned identification in the report) within the radius of the project, no archaeological sites have been identified within the project site. In addition, no archaeological determinations of eligibility ("ADOE") are identified on the project site or within a ½ mile radius of the site. Therefore, impacts are less-than-significant. It is not known at this time if future development of the related project sites would involve cultural resources. However, similar to the project, the Related Projects are subject to the requirements of CEQA and City archaeological resource protection ordinances. As such, the Related Projects would be evaluated on a case-by-case basis and any potential impacts to

archaeological resources would be addressed at that time. Therefore, cumulative impacts on archaeological resources are less than significant.

E. Geology and Soils

1. Seismic Fault Rupture, Strong Seismic Ground Shaking, Liquefaction, Subsidence and Expansive Soils

Seismic Fault Rupture: The project site is not included in a State of California Alquist-Priolo Earthquake Fault Zone or a City of Los Angeles Fault Rupture Study Area. Based on the available geologic data, active or potentially active faults with the potential for surface fault rupture are not known to be located beneath or projecting toward the project site. Therefore, the potential for surface rupture at the project site due to fault plane displacement propagating to the ground surface is considered low and less than significant.

Strong Seismic Ground Shaking: The project site is located in a seismically active region, and future users on the project site will be exposed to seismic ground shaking. Although the project is within the Puente Hills Blind Thrust Fault Zone, and is nearby many other faults on a regional level, the potential seismic hazard to the project site will not be higher than in most areas of the City or elsewhere in the region. In addition, conformance with current Building Code requirements will minimize the potential for structures on the project site to sustain damage during an earthquake event. Therefore, impacts are less than significant.

Liquefaction: The project site is not located in a liquefaction zone. Therefore, potential impacts from liquefaction are deemed less than significant.

Subsidence: Groundwater and petroleum are not currently being extracted from the project site and would not be extracted as part of the project. Thus, subsidence as a result of such activities will not occur and impacts are less than significant.

Expansive Soils: According to the preliminary geotechnical evaluation prepared for the project, the project is not be affected by expansive soils. In addition, construction of the project is required to comply with the City UBC and the 2013 California Building Code, which include building foundation requirements appropriate to site-specific conditions, and the site-specific requirements identified in the Geotechnical Study that also address lateral spreading and settlement. Therefore, impacts are less than significant.

Cumulative Impacts: The geographic scope of the cumulative geology and soils analysis is the project vicinity. Geologic, soils and seismicity impacts tend to be localized; therefore, the area near the project site would be most affected by project activities (generally within a 500-foot radius) and, as there are no project impacts for geology and soils, the project does not contribute to cumulative impacts, and therefore, cumulative impacts are less than significant.

F. Hazards and Hazardous Materials

1. Construction and Operational Impacts of Hazardous Materials, Proximity to a School, and Emergency Response Plan

Construction (Except Radon): Construction of the project involves the use of those hazardous materials that are typically necessary for construction of mixed-use development (i.e., paints, building materials, cleaners, fuel for construction equipment, etc.). The project's transport, use and disposal of construction-related hazardous materials conforms to all applicable local, State, and federal regulations governing such activities. In addition, the Phase I site assessment did not identify on- or off-site land uses that represent a potential recognized environmental condition to the project site. The 200-gallon-capacity Above Ground Storage Tank (AST) utilized for storage of diesel fuel for the 400-kws emergency Caterpillar generator within the Reef building does not show any signs of spillage and is properly registered and maintained. Redevelopment or renovation of spaces within the Reef could disturb previously identified Asbestos Containing Materials (ACMs). However, surveys of affected on-site structures and facilities are required to verify the presence or absence of ACMs, and remediation or abatement are required before any disturbance. Similarly, since the existing structures and facilities on-site may contain Lead Based Paint (LBP), surveys of affected on-site structures and facilities are required to verify the presence or absence of LBP and, if they are, remediation or abatement are required. Finally, since the project site is within a City-designated methane zone, the project is required to comply with the General Methane Requirements pursuant to Section 91.7103 of the LAMC and existing City regulations if methane gas is detected at pressures and/or concentrations of concern. Therefore, impacts are less than significant.

Operation: The project does not utilize hazardous materials during day-to-day operations, other than small quantities of typical household, vehicle, and landscape maintenance materials such as cleaning supplies, paints, oil, grease, and fertilizers, all in accordance with manufacturers' instructions for use, storage, and disposal. In addition, the Phase I site assessment did not identify on- or off-site land uses that represent a potential recognized environmental condition to the project site. Therefore, impacts are less than significant.

Proximity to a School: Santee Education Complex and Frida Kahlo Continuation High School are approximately 0.10 mile east of the project site. The LATTC is approximately 0.15 mile west. There are no other schools within 0.25 miles. As the project complies with all standards, regulations, and good housekeeping practices, it does not emit any hazardous emissions during construction or operation that adversely affect schools located within one-quarter mile of the project site and, therefore, impacts are less than significant.

Emergency Response Plan: The project site is not located in the vicinity of a designated disaster route. The majority of construction activities are confined to the site, although the project may result in temporary closures of travel lanes during construction. Implementation of a Construction Staging and Traffic Management Plan described in Section IV.N, Transportation, of the Draft EIR, and compliance with access standards reduce the potential for the impacts on emergency response during construction. In addition, drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, construction and operation of the project does not significantly impair implementation of, or physically interfere with, any adopted or on-site emergency response or evacuation plans and impacts are less than significant.

Cumulative Impacts: The geographic scope of cumulative impacts related to hazardous materials is the area within one-quarter mile of the project site. The potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of the Related Projects. Compliance with all applicable local, state, and federal laws regarding hazardous materials would reduce cumulative impacts associated with the development of the Related Projects to less than significant.

G. Hydrology and Water Quality

1. Surface Water Quality, Groundwater, Surface Water Flood Hazards, Hydrology/Drainage

Surface Water Quality: Project construction involves potential sources of stormwater pollution, such as adhesives, cleaning agents, landscaping, plumbing, painting, heat/cooling, masonry materials, floor and wall coverings, and demolition debris. However, all hazardous materials are required to be stored, labeled and used in accordance with the OSHA regulations. In addition, Best Management Practices (BMPs) ensure that construction related water quality impacts will be lessened. Similarly, during operation, runoff may contain urban pollutants, such as auto fluids and oils, but the project is required to comply with County and City regulations, including the SUSMP and the City's LID ordinance, to retain and treat storm water and prevent additional flows into the City's stormwater system. The project also includes four storage tanks and drywell systems for stormwater runoff. Therefore, impacts are less than significant.

Groundwater: Direct additions or withdrawals of groundwater are not proposed by the project. Furthermore, the project decreases the amount of impervious surfaces with the inclusion of landscaped areas and provides facilities for groundwater recharge. Therefore, the project does not increase the amount of impervious surfaces and impacts are less than significant.

Flooding: The project site is in Flood Zone X, and therefore outside of the 50, 100

and 500-year flood zones. Accordingly, potential flood impacts hazard are less than significant.

Drainage: During project construction, a temporary alteration of the existing on-site drainage pattern may occur. Specifically, grading activities can increase erosion processes. However, these changes do not result in substantial erosion or siltation due to stringent controls imposed under the General Construction Activity Stormwater Permit, including implementation of a SWPPP, and the Los Angeles County MS4 Permit. Common measures for controlling fugitive dust emissions, such as covering truck loads and street sweeping, are also effective in controlling stormwater quality. Second, the construction area will be secured to control off-site migration of pollutants. Erosion control devices, including temporary diversion dikes/berms, drainage swales, and siltation basins, are typically required around construction areas to ensure that sediment is trapped and properly removed. During operation, the project does not modify the manner in which the surrounding streets convey storm runoff to the City storm drain system. Furthermore, the project is required to comply with the SUSMP, MS4 permit and the City's LID, which reduce the volume of runoff from the site after the project is constructed. Therefore, impacts are less than significant.

Cumulative Impacts: The geographic scope of cumulative hydrology and water quality impacts is the Los Angeles River watershed and associated receiving waters. Future development of the Related Projects and other development within the watershed could affect the amount, the rate, the velocity, and the quality of runoff within their respective local drainage areas. However, similar to the project, each of the Related Projects is required to prepare and implement a SUSMP and undergo a review by the City to ensure compliance with the MS4 permit and the LID Ordinance. The Related Projects also have to determine what drainage improvements and BMPs are required to ensure that the storm drain capacity of the system is adequate and that no downstream flooding occurs as a result of exceedance of storm drain capacity, and that no significant water quality issues occur. With compliance with regulatory requirements, the project does not result in any significant hydrology and water quality impacts. Therefore, cumulative impacts are less than significant.

H. Land Use and Planning

1. Community Division and Land Use Compatibility, and Consistency with Land Use Plans and Policies

Community Division and Land Use Compatibility: The project does not physically divide an established community because it is being constructed on a site that has been developed for over 50 years. In addition, the project site is within a densely developed urban area with a mix of institutional, educational, commercial, light industrial and residential uses. No existing streets will be eliminated and no existing residents will be displaced. Thus, the development does not separate the

community from those elements that establish the area as a community. The project's physical characteristics do not prevent or substantially impair existing adjacent land uses to continue their function since the project includes uses compatible with those of the surrounding area. Specifically, the project site and the surrounding area are in a portion of the City undergoing a significant transition and many new developments, including mixed-use projects, are either built, under construction or proposed within or adjacent to Downtown Los Angeles. The project's pedestrian, transit-oriented and mixed-use characteristics are compatible with the commercial, institutional, educational uses surrounding the site as well as the commercial, mixed-use and entertainment developments one mile north of the project site. Therefore, impacts are less than significant.

Consistency with Land Use Plans and Policies: The development of the project is subject to numerous state, regional and City land use plans and policies, such as the 2008 Regional Comprehensive Plan (RCP), the Southern California Compass Blueprint Growth Vision, the Regional Transportation Plan/Sustainable Communities Strategy, the City General Plan, the Southeast Los Angeles Community Plan, the Draft/Proposed Southeast Los Angeles Community Plan, the Plan For a Healthy Los Angeles, the Citywide Design Guidelines, the 2013-2021 Housing Element, and City Planning and Zoning Code requirements. The project is generally consistent with all land use plans and policies. Specifically, the project is consistent with SB 375, a state law targeting greenhouse gas emissions from vehicles, since it reduces vehicle miles traveled due to the fact that project residents, employees, and visitors may use public transit, such as the nearby Metro Blue Line, Metro Expo Line and various Metro bus lines. The project also conforms to the goals set forth in the 2008 RCP, including those goals related to regional growth, mobility, and sustainability as shown in Table IV.J-1 (Project Consistency with Applicable Regional Comprehensive Plan Objectives) of the Draft EIR. Similarly, the project conforms to the Southern California Compass Blueprint Growth Vision goals related to the improvement of mobility for residents, the increase in livability in all communities, the increase in prosperity for all people, and the promotion of sustainability for future generations. The project achieves these goals due to its nature as an infill redevelopment project that creates an urban center with opportunities for people to live, work, and visit in this Downtown Los Angeles-adjacent area.

The project also conforms to the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) as shown in Table IV.J-2 (Consistency of the Project with the Applicable Goals of Regional Transportation Plan) of the Draft EIR. Similarly, the project is consistent with a Plan For A Healthy Los Angeles, as analyzed in Table IV.J-5 (Consistency of the Project with the Applicable Policies of the Plan For A Healthy Los Angeles). Specifically, the project is consistent with these plans by converting surface parking lots into a mixed-use project with significant open space and community amenities conducive to pedestrian use. In addition, the vertical integration of a mix of uses, and concentration of jobs and new development within walking distance of public transit options, reduce air

pollution and greenhouse gas emissions.

In addition, the project is also consistent with General Plan, as shown in Table IV.J-3 (Project Consistency with the Applicable Objectives and Policies of the City of Los Angeles General Plan Framework Element) of the Draft EIR. Specifically, the project is consistent with 15 goals related to the provision of both commercial and residential uses close to significant public transit opportunities and the inclusion of open space, pedestrian amenities and bicycle facilities. The project is also consistent with several similar goals of the Southeast Los Angeles Community Plan, as shown in Table IV.J-4 (Comparison of Southeast Los Angeles Community Plan Objectives to Project Characteristics) of the Draft EIR.

As analyzed in Table IV.J-6 (Consistency of the Project with Applicable Objectives of the City of Los Angeles Citywide Design Guidelines), the project also implements Objectives 1 through 5 of the Citywide Guidelines. The project achieves these Objectives by being designed to provide direct paths of travel to multiple public transit facilities and through the incorporation of public bicycle spaces. In addition, the project employs high quality architecture with detail and articulation at all levels and provides mid-block paseos connecting the project uses internally as well as to the surrounding streets. Finally, the project creates 162,255 square feet of open space, of which 73 percent will be common public open space.

As analyzed in Table IV.J-7 (Consistency of the Project with Applicable Goals, Objectives and Policies of the City of Los Angeles Housing Element 2013-2021) of the Draft EIR, the project implements a number of the City of Los Angeles Housing Element Goals, Policies and Objectives. Namely, the project promotes housing production by providing a range of housing types in a new mixed-use development near public transit options. The project also promotes safe, livable and sustainable neighborhoods by converting surface parking lots into a new mixed use residential, commercial development.

Project uses would not be consistent with the existing General Plan land use designation and zoning of the project site and, thus, the applicant has requested a General Plan Amendment and corresponding Vesting Zone Change for the project site from [Q]M1-2-O and M1-2-O to C2-2-O. In accordance with Sections 12.14 of the City Planning and Zoning Code, with these requests, the proposed project uses are permitted in and consistent with the C2 zone because this commercial zone allows for the construction of a variety of commercial uses, including retail stores, offices, restaurants, parking structures, as well as hotel and multi-family residential uses.

Therefore, impacts related to consistency with these land use plans are less than significant.

Cumulative Impacts: Development of the project, in conjunction with the Related Projects, results in an intensification of existing prevailing land uses in the project

vicinity. However, these projects would be subject to specific findings and conditions. As such, development of the project and related projects is not anticipated to substantially conflict with the intent of the City's General Plan regarding the future development of the Southeast Los Angeles community, or with other land use regulations required to be consistent with the General Plan, such as the Planning and Zoning Code. Therefore, cumulative impacts are less than significant.

I. Noise

1. Traffic Noise and Vibration

Off-Site Construction: The major noise sources associated with off-site construction trucks would be associated with delivery/haul trucks during the project site excavation phase.). The noise level generated by construction trucks during the peak period (excavation phase) will be approximately 75 dBA Leq along the haul routes. The estimated noise from the haul trucks is consistent with the existing daytime ambient noise levels at two sensitive receptors along Hill Street and Main Street. During other construction phases, the number of construction trucks will be lower, which will result in lower noise levels. Therefore, the construction traffic noise impacts is less than significant.

Operational Noise: Operational noise consists of noise from building mechanical systems, parking facilities, loading and trash areas and outdoor spaces. However, all on-site mechanical equipment are required to comply with the regulations under Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Noise impacts from parking facilities are also less than significant since the subterranean parking levels at the East Block will be fully enclosed on all sides. The loading docks and trash areas for the project are located within the West Block and East Block parking structures. Therefore, noise associated with the loading/unloading and trash collection activities will be attenuated from off-site sources by the parking structures walls. Noise could also emanate from the project's outdoor spaces, such as the restaurant and outdoor space on the roof of the Reef Building, the hotel outdoor pool area and other open spaces. Compliance with existing regulations ensures that amplified program sound would not exceed the significance threshold. Furthermore, as indicated in Table IV.K-14 of the Draft EIR, the estimated noise levels from outdoor spaces use will be below the significance threshold at all off-site sensitive receptors. Finally, compliance with existing regulatory measures ensure that necessary noise insulation features are included in the final building design to achieve an interior noise environment that do not exceed 45 dBA Leq, in accordance with the City's Building Code.

Additional off-site noise comes from traffic generated once the project is operating. Table IV.K-15 of the Draft EIR summarizes the off-site roadway noise in the future

produced by the project. This table shows that the project results in a maximum of a 0.7 dBA increase in traffic noise along Main Street between Venice Boulevard and Washington Boulevard. The projected increases in noise level are considered negligible in the existing exterior noise environment. In addition, the change will be below the 3 dBA CNEL significance threshold which is considered to be an increase just perceptible to the human ear. When compared with existing conditions, as shown in Table IV.K-16 of the Draft EIR, the project results in a maximum of a 1.8 dBA (CNEL) increase in traffic noise along Main Street, between Venice Boulevard and Washington Boulevard. The estimated increase in off-site traffic noise levels as compared to existing conditions is well below the 3 dBA CNEL significance threshold. Therefore, the traffic noise impact is less than significant.

Construction and Operational Related Ground-borne Vibration: The project will generate ground-borne construction vibration during site demolition and excavation/grading activities when heavy construction equipment, such as large bulldozers, will be used. As indicated in Table IV.K-11 of the Draft EIR, vibration velocities from typical heavy construction equipment during construction are below the significance thresholds. The project does not include uses that are expected to generate measurable levels of ground-borne vibration during operation. Therefore, vibration impacts are less than significant.

Cumulative Impacts (Except 17th Street, west of Hill Street and Related Project No. 53): It is anticipated that construction-related noise levels from the Related Projects would be intermittent and temporary. In addition, the Related Project are required to comply with time restrictions and other relevant provisions in the LAMC. In addition, noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual related project and compliance with locally adopted and enforced noise ordinances. Off-site construction haul trucks would have a potential to result in cumulative impacts if the haul trucks for the Related Projects and the project utilize the same haul routes. However, the estimated noise levels from project haul trucks are below the significance threshold. Potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in close proximity of the construction site (i.e., within 15 feet as related to building damage and 80 feet as related to human annoyance). However, the nearest Related Project is located approximately 95 feet from the project. Therefore, there would be less than significant cumulative impacts except for at 17th Street, west of Hill Street, and at Related Project No. 53, discussed below under Significant and Unavoidable Impacts.

J. Population, Housing and Employment

Construction of the project results in increased construction jobs, which could potentially result in increased permanent population and demand for housing in the vicinity of the project site. However, construction workers are unlikely to

relocate their households. Operation of the project is projected to generate approximately 3,808 employees, a net increase of approximately 1,161 employees on the project site. This increase is within the parameters of SCAG's forecast of 82,500 additional jobs in the City between 2008 and 2020. The project's construction of 1,444 additional residential dwelling units is expected to accommodate between 2,224 and 6,309 new permanent residents in the City. The addition of these new residents is within the SCAG growth projection. Therefore, impacts to population, housing and employment are less than significant.

Operation Impacts: The project has no impact on displacement of housing or residents because there are currently no residential units on the project site. In addition, as discussed in Response to Comment 10-8 in the Final EIR (FEIR), which is incorporated into these Findings by reference herein, there is no correlation between the project and any physical impact on the environment which could result in nearby residents and businesses being displaced and experiencing health impacts. Accordingly, since CEQA does not require an analysis of potential economic and social effects which are not caused by a project's physical change to the environment, nor an analysis of speculative impacts, the project does not create any environmental impacts due to displacement.

Cumulative Impacts: The projected cumulative employment growth associated with the project and Related Projects is 1,639 employees, within the parameters of SCAG's forecast. The projected increase in employment therefore does not require the construction or extension of major infrastructure that could accelerate unexpected development, as this projected growth is within developed urban areas. The projected cumulative housing growth associated with the project and Related Projects is 4,288 units, within the parameters of SCAG's forecast. The projected increase in housing units does not require the construction or extension of major infrastructure that could accelerate unexpected development, as this projected growth is within developed urban areas. The projected cumulative population growth associated with the project and Related Projects is 14,453 persons, within the parameters of SCAG's forecast. The projected increase in population does not require the construction or extension of major infrastructure that could accelerate unexpected development, as this projected growth is within developed urban areas. Therefore, the projects contribution to cumulative population growth impacts would be less than significant.

K. Public Services and Recreation

1. Fire Protection, Schools, Parks and Recreation, and Libraries

Fire Protection: Construction on the project site increases the potential for accidental on-site fires from such sources as the operation of mechanical equipment and use of flammable construction materials. However, the implementation of "good housekeeping" procedures by the construction contractors and the work crews minimizes these hazards. The increase in

employees and visitors to the project site generated by the project also potentially increases demand for fire protection services. DWP has indicated the existing static water pressure in the project area ranges from 55 to 74 pounds psi, in excess of the minimum residual water pressure of 20 pounds PSI. The final fire flow required for the project will be established by the LAFD during its review of the project plot plan, prior to the issuance of a building permit by the City. The plot plan for the project is required to identify the minimum fire flow requirements and the location of fire hydrants. Approval of this plot plan and compliance with existing regulations ensure the requisite fire flow for the project site. The project site is approximately 0.6 mile from Fire Station 10, which houses a task force; therefore, the project site is within the LAMC maximum response distance for both residential and commercial land uses. In addition, based on the project's circulation, it is anticipated that the LAFD can respond to on-site areas within the established response time. Furthermore, a sprinkler system and conformance with applicable Fire Code and LAFD building requirements ensure adequate on-site fire protection. Therefore, project impacts on fire protection services are less than significant.

Schools: Schools that serve the project site are San Pedro Elementary School, Adams Middle School, and Santee Education Complex. The total increase of students as a result of the project is approximately 1,893 students. These students can be accommodated within the existing LAUSD system. Therefore, project impacts on schools are less than significant.

Parks and Recreation: The project site is served by the Hoover Recreation Center. The project provides open space in accordance with LAMC Section 12.21(G)(2) and supplements the existing parks and recreation facilities with 3.7 acres of common open space features and recreational amenities that serve the residents' recreational needs. Therefore, the project's inclusion of on-site open space and recreational facilities reduces the use of parks by project residents. Future impacts on park facilities are mitigated through the collection of Quimby fees to the City to satisfy its obligations under the Quimby Act and/or provide payment of the Dwelling Unit Construction Tax. Therefore, impacts to parks and recreation services are less than significant.

Libraries: The project site is served by the Central Library located at 630 5th Street. The project is expected to generate a maximum of approximately 6,309 residents, which is expected to generate the need for between approximately 1,112 and 3,155 square feet of library facility space. At 538,000 square feet, the Central Library exceeds the recommended standards for the number of residents at the project. Therefore, library impacts associated with project are less than significant.

Cumulative Impacts: It is anticipated that the additional population and commercial land use can increase the demand for fire protection services in the service areas for LAFD Fire Stations 9, 10, and 15. However, each of the Related Projects is required to install automatic fire sprinkler systems if located at a distance to the nearest fire station that exceeds the LAFD required response distance. In addition,

each of the Related Projects is subject to LAFD review of site plans, hydrant location and fire flow requirements. Finally, through the allocation of City resources in the City's annual programming and budgeting processes, the cumulative demand for fire protection growth in residential population and commercial development is addressed and, thus, the project, in conjunction with growth in demand for fire protection services Citywide, does not represent a substantial contribution to a significant cumulative effect. Therefore, with incorporation of the Project Design Feature and compliance with existing regulatory measures, the project's contribution to cumulative fire protection impacts is less than significant.

The project, in combination with the related and other future projects, would be expected to increase the cumulative demand for schools in LAUSD as shown in Table IV.M.3-3 (Cumulative Student Generation) of the Draft EIR. However, pursuant to SB50, future impacts on school facilities are mitigated through the collection of development impact fees to the LAUSD Developer Fee office. In addition, LAUSD opened three new schools within the past five years to provide approximately 2,500 additional seats to supplement the schools that serve the project site.

The increase in residential population by the Related Projects increases the demand for parks and recreation facilities and further impacts the shortage of park/recreational space in the Southeast Los Angeles Community Plan area. In accordance with State CEQA Guidelines Section 15130(a)(3), the project's contribution to the cumulative impact is less than cumulatively considerable through adherence to the City's parks fee programs for new development. Adherence to the requirements of this program constitute implementation or funding of the project's fair share of measures designed to alleviate the cumulative impact and, therefore, impacts are less than significant.

The project is expected to increase demand for library services in the project vicinity. Under the terms of Measure L, libraries have been required to pay for their own direct and indirect costs since July 2014. This dedicated funding source is intended to address cumulative demand for library services throughout the City. Therefore, cumulative impacts are less than significant.

It is anticipated that the additional population and commercial land use creates an increase the demand for police protection services in the Newton Station service area. Each of the Related Projects would be subject to LAPD review of site plans, and security measures. In addition, demands are met by LAPD through the allocation of available resources by LAPD management to meet varying needs throughout the LAPD's Bureaus and Community Police Stations, as well as through the allocation of City resources between LAPD and other City departments, accomplished through the City's annual programming and budgeting processes. Through this process, cumulative demand for police services within the Newton Station area would be managed, and the project, in conjunction with Related Projects, does not result in a substantial contribution to a significant

cumulative impact. Impacts are therefore less than significant.

2. Project Design Feature

The City finds that Project Design Feature PDF-PS-1, which is incorporated into the project and is incorporated into these Findings as though fully set forth herein, would reduce the potential fire protection services impacts of the project. This Project Design Feature was taken into account in the analysis of potential impacts.

L. Transportation/Circulation

Construction: The number of construction workers and construction equipment vary throughout the construction process. Construction worker traffic occurs before the morning and afternoon peak commute hours. An average of 125 workers occur on-site with a peak of up to 500 workers. Because construction worker traffic occurs outside the peak hours, traffic from construction workers is not expected to create a significant impact on the street system. In addition, parking for construction workers is provided on-site, on the part of the project site that is not under construction (i.e., on the East Block during West Block construction, and vice versa). The traffic analysis showed that the level of traffic from truck hauling does not result in a significant traffic impact on the street system, as it would be well below the projected traffic from the project. In addition, haul traffic is temporary. The hourly volume of delivery trucks is less than the estimated level of truck activity during the excavation phase and does not create a significant traffic impact on the street system. Flagmen can also control traffic movement during the ingress and egress of trucks and heavy equipment. Any required lane closures are included in the Work Area Traffic Control Plan required for the project, which must be submitted and approved by LADOT prior to issuance of any construction permits. Therefore, transportation/circulation impacts associated with project construction are less than significant.

Operation: Traffic volume projections were developed to analyze the existing traffic conditions after completion of the project. Potential operational impacts were analyzed in the Draft EIR through the study of sixty-five intersections, in two traffic horizon years (Existing Year 2014 and Future Year 2035) using the City Department of Transportation (LADOT), guidelines and methodologies and the Highway Capacity Manual (HCM) Methodology for both signalized and unsignalized intersections. The intersection level of service analyses for the Existing With Project and the Future With Project conditions are summarized in Table 5.1, Table 5.2, Table 6.1 and in Table 6.2 of the Traffic Study. Figures illustrating these traffic forecasts are provided in the Appendix IV.N of the Draft EIR. With the exception of the intersections identified on page IV.N-24 of the Draft EIR and in the Significant and Unavoidable Impacts discussion below, the operational impacts at the remaining intersections are less than significant. Project trip volumes are less than the CMP threshold of 50 both in the AM and PM peak hours at all CMP arterial monitoring locations closest to the project site. Similarly,

the Traffic Study shows that the level of service would not change at any mainline freeway segment due to the project and that the project trips will not exceed the CMP threshold. All project driveways are designed in accordance with LADOT standards and approvals. Therefore, project driveways do not create any significant impacts. Therefore, impacts are less than significant.

Cumulative Impacts: With the exception of significant impacts discussed further below, the project's remaining cumulative operational traffic impacts are less than significant. There are approximately seven Related Projects (Nos. 6, 42, 53, 54, 57, 63 and 71) within a quarter mile of the project site with most a block or two from the site and one (No. 57) directly across Main Street. Due to the close distance of these Related Projects, there may be some overlap with construction activities such as temporary lane or sidewalk closures along Washington Boulevard or Main Street. However, these impacts are temporary and limited to the construction phase of each project, and each of the Related Projects is required to submit a construction work site traffic control plan to LADOT for review and approval prior to the start of any construction work. In addition, with adherence to LADOT's requirements and with compliance with existing regulations, the project's contribution to cumulative construction traffic impacts is less than significant.

1. Project Design Feature

The City finds that Project Design Feature, PDF-TR-1, which are incorporated into the project and incorporated into these Findings as though fully set forth herein, reduce the potential transportation/circulation impacts of the project. This Project Design Feature was taken into account in the analysis of potential impacts.

M. Utilities

1. Wastewater, Water, Solid Waste, Electricity, Natural Gas

Wastewater: The project is anticipated to generate an increase of approximately 329,258 gpd of wastewater (0.33 mgd), within the design capacity of existing infrastructure. In addition, the Hyperion Treatment Plant (HTP) has sufficient treatment capacity to accommodate the project's average daily total scenario wastewater generation. With the City's implementation of the provisions of the Sewer Allocation Ordinance, the project's wastewater generation is not projected to exceed the future scheduled capacity of the HTP. Also, based on current gauging, the 52-inch line beneath Jefferson Boulevard and the 12-inch line beneath Main Street, are operating at approximately 50 percent design capacity. Based on project wastewater flows, the sewer system can accommodate the projected flows. Further detailed gauging and evaluation, at the time of project connection to the system, is needed as part of the permit process to identify a specific sewer connection point, based on the flows in the multiple existing lines serving the project site at the time of connection. Therefore, project impacts on

wastewater are less than significant.

Water: The average daily domestic net water demand of the project is estimated to be approximately 327,527 gpd (or 366.825 af/y), which is within the growth projections of the LADWP. Therefore, the LADWP can meet the project's water demand, as indicated in the Water Supply Assessment (WSA) dated May 20, 2015. In addition, the project complies with the City's mandatory water conservation measures that, relative to the City's increase in population, have reduced the rate of water demand in recent years. Should it be determined during the plot plan review that the existing fire-flow is not sufficient to serve the project site, and that the project requires the installation of new water lines, meters, private fire hydrants, or other fire safety features, these features are required to conform to the City's Fire Code in consultation with the City Fire Department. Therefore, project impacts on water are less than significant.

Solid Waste: Construction debris consists primarily of debris from the removal of these existing surface parking lots located on the East and West Blocks and demolition of 11,150 square feet of existing warehouse/distribution building on the East Block. However, project-generated demolition and construction-related waste represents a small percentage of the inert waste disposal capacity in the region.

Operation of the project results in ongoing generation of solid waste. Over the long-term, the project is expected to generate approximately 8,032 net ppd of solid. The remaining combined intake of the Sunshine Canyon Landfill and the Chiquita Canyon Landfill is approximately 90.48 million tons. As such, they have adequate capacity to accommodate the daily operational waste generated by the project and, therefore, solid waste impacts are less than significant.

Electricity: The existing land uses on the project site consume approximately 26,519 kilowatt-hours (kWh) per day. Project consumption is approximately 121,698 kWh per day, a net increase of approximately 95,179 kWh per day over the existing uses. The LADWP has indicated that the project's demand for electricity can be served via existing infrastructure, and no improvements or additions to LADWP's off-site distribution system are needed. In addition, the project is designed in accordance with 2013 Title 24, California's Energy Efficiency Standards for Residential and Nonresidential Buildings. Therefore, project impacts on electricity are less than significant.

Natural Gas: The existing land uses on the project site consume approximately 82,189 cf of natural gas per day. The estimated net increase in demand is approximately 224,708 cf per day. Decreases in California natural gas demand and State Energy Conservation ensure there is not a significant effect on natural gas resources. Therefore, project impacts on natural gas are less than significant.

Cumulative Impacts: Implementation of the project in combination with the Related Projects increases the demand for wastewater conveyance infrastructure provided

by LABS. Each of the Related Projects is required to obtain a final approval from for a sewer capacity connection permit. In addition, sewer line capacity is to be evaluated on a case-by-case basis and addressed through project-specific gauging and provision of additional infrastructure as required, in accordance with existing permitting processes. Wastewater generation from the project and Related Projects are addressed in the total increased wastewater flows throughout the HTP in the IRP and are sufficient to handle the projected flows through 2020. Therefore, cumulative impacts associated with wastewater are less than significant.

Implementation of the project in conjunction with Related Projects increases demand for water supplied by the LADWP, but the demand falls within the UWMP's projected water supplies. LADWP has confirmed that there are no known infrastructure deficiencies in the project vicinity, therefore, it is anticipated that the local water infrastructure can adequately accommodate the increased demand to serve the project and the Related Projects. Implementation of the project in conjunction with Related Projects increases solid waste demands, but the Related Projects is subject to the Citywide Construction and Demolition Waste Recycling Ordinance and there is adequate capacity in the County for the disposal of waste. To address the total long range solid waste disposal needs of the City, the City is developing the Solid Waste Integrated Resources Plan (SWIRP), to develop and implement of a 20 year master plan for the City's solid waste and recycling programs. Implementation of the SWIRP therefore addresses the disposal of solid waste from the project and other development in the City. Implementation of the project in conjunction with Related Projects could create increased demand for electricity; however, the LADWP annually prepares a Power Integrated Resource Plan to ensure that current and future energy needs are met. Additionally, the project is designed to meet LEED certification requirements from USGBC and comply with State Building Energy Efficiency Standards outlined in Title 24 of the California Code of Regulations. Implementation of the project in conjunction with Related Projects could generate increased demand for natural gas; however, the Southern California Gas Company has the resources and infrastructure in place to plan for and meet the increased demand. Therefore, the project's cumulative impact on utilities is less than significant.

2. Project Design Features

The City finds that Project Design Features PDF-UT-1 PDF-UT-2, PDF-UT-3, PDF-UT-4, PDF-UT-5, PDF-UT-6, and PDF-UT-7, which are incorporated into the project and incorporated into these Findings as fully set forth herein, reduce the potential utilities impacts of the project related to Wastewater/Sewer, Water, Solid Waste, Electricity, Natural Gas and Cumulative Impacts. These project design features were taken into account in the analysis of potential impacts.

N. Land Use Equivalency Program and Design Guidelines

1. Land Use Equivalency Program

The full description of the Land Use Equivalency Program is contained in the Land Use Equivalency Program Technical Report in Appendix II-1 to the Draft EIR. The Land Use Equivalency Program is predicated on the requirement to avoid any additional impacts, with an emphasis in two areas – peak hour traffic and wastewater infrastructure. As discussed in the project's traffic study (Appendix IV-N to the Draft EIR), the most impactful time period with respect to project traffic is the Friday Evening Hour. However, as shown in the Traffic Study, the trip generation rates for the PM Peak Hour and the Friday Evening Hour are the same. Therefore, the PM Peak Hour/Friday Evening Hour trip rate is used in the Draft EIR analysis as the basis for potential land use exchanges. In order to ensure that land use exchanges do not result in an increase in peak hour generation, the Land Use Equivalency Program's rules require that potential land use exchanges do not exceed the project's PM Peak Hour or Friday Evening Hour traffic. In terms of potential wastewater infrastructure impacts, LABS has identified that wastewater infrastructure that serves the project and surrounding area is potentially constrained, particularly with respect to a 52-inch trunk line in Jefferson Boulevard that is currently operating at 50% capacity (see Section IV.O-1 of the Draft EIR). In order to ensure that potential land use exchanges do not result in an increase in wastewater generation that causes an impact on the infrastructure, the Land Use Equivalency Program's rules require that no new wastewater generation is created the exceeds that of the project. Therefore, no additional environmental impacts related to traffic and wastewater infrastructure are expected to result from implementation of the Land Use Equivalency Program. In addition, the Land Use Equivalency Program includes a City discretionary review process if the property owner desires to use either the Land Use Equivalency Program or the Design Guidelines described below (collectively, the Equivalency Program). In the event the applicant or subsequent applicants should choose to utilize the Land Use Equivalency Program, the subsequent phase(s) of the project are subject to LAMC Section 106.5 (Site Plan Review) in addition to the provisions stated on page II-37 of the Draft EIR, which will be identified in a "Q" condition if the project is approved.

2. Design Guidelines

The Design Guidelines allow for flexibility in the project building design within a determined set of parameters. These parameters frame the analysis of the project in the Draft EIR and through the entitlement process. The project as developed conforms to the following design parameters:

- Building coverage of the combined site area between the heights of 22 feet and 100 feet shall be no more than 50 percent of the site area.
- Building coverage above a height of 100 feet shall be no more than 25 percent of the site area.
- The mid-block paseo, podium levels, parking structures, and the existing Reef building shall be included in the area not considered building

coverage.
• Building separation above a height of 100 feet shall be a minimum of 70 feet.
• No building shall have a footprint above a height of 100 feet of greater than 30,000 square feet.
• The mid-block paseo shall be no smaller than 15,000 square feet and shall be generally oriented towards Broadway between Washington Boulevard and 21st Street.
• If the mid-block paseo is at grade, it may have auto circulation.
• There shall be, at a minimum, one pedestrian connection from Hill Street to Broadway, and one pedestrian connection from Broadway to Main Street.
• Within the mid-block paseo, at least 20 percent of the area shall be landscaped or included in a water feature, as distinct from the hardscape area.
• On each of the five frontages of the property, the following minimum proportions of the building faces, from sidewalk grade to 100 feet above, shall be transparent (i.e., openings or glass) rather than opaque: (i)Washington Boulevard – 50 percent; (ii) Broadway – 50 percent; (iii) Hill Street – 25 percent; (iv) Main Street – 25 percent; and (v) 21st Street – 25 percent.
• The existing Reef building shall not be included in the building façade calculations.
• No building above a height of 100 feet shall have any façade longer than 300 feet in length.
• Access points and site circulation shall be maintained in general conformance with the Conceptual Plan for the project.

In the event the applicant or subsequent applicants should choose to utilize the Design Guidelines, the subsequent phase(s) of the project are subject to LAMC Section 106.5 (Site Plan Review) in addition the provisions stated on page II-37 of the Draft EIR, which will be identified in a “Q” condition if the project is approved.

VII. ENVIRONMENTAL IMPACTS FOUND LESS THAN SIGNIFICANT PRIOR TO MITIGATION, WHERE MITIGATION NONETHELESS PROVIDED TO FURTHER REDUCE IMPACTS

The following impact areas were concluded by the Draft EIR to be less than significant prior to mitigation. However, mitigation measures described in the Final EIR nonetheless are provided to further reduce impacts. Based on that analysis and other evidence in the administrative record relating to the project, the City finds and determines that mitigation measures described in the Final EIR reduce impacts identified for the following environmental impact categories.

A. Greenhouse Gas Emissions

The SCAQMD’s draft 2020 target for project-level analysis is 4.8 MT/year CO2e per service population. The project’s efficiency metric is calculated to be

4.76MT/year CO2e per service population which does not exceed the SCAQMD draft efficiency target. Details regarding the assumptions and calculations of GHG emissions associated with the project are contained in the GHG Report in Appendix IV.G-1 to the Draft EIR. The geographic extent of GHG emissions is global, and the effect of these emissions on global climate change is potentially world-wide. The contribution of the project to the cumulative effect of global climate change would not be cumulatively considerable. The project does not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses. Specifically, the project is consistent with the goals of AB 32 and will meet the energy efficiency requirements of the 2013 Title 24 CALGreen Code, and the City Green Building Code. Therefore, project impacts are less than significant. Nonetheless, to reduce the less than significant impacts related to greenhouse gas emissions, MM-TR-13 is incorporated into the project to encourage the use of transit and reduce vehicle trips and to ensure that impacts remain less than significant.

1. Project Design Features

The City finds that Project Design Features PDF-GHG-1, PDF-GHG-2, PDF-GHG-3, and PDF-GHG-4, which are incorporated into the project and incorporated into these Findings as fully set forth herein, reduce the potential greenhouse gas emissions impacts of the project. These Project Design Features were taken into account in the analysis of potential impacts.

2. Mitigation Measure

The City finds that Mitigation Measure MM-TR-13, which is incorporated into the project and incorporated into these Findings as fully set forth herein, lessens the less-than-significant impacts related to greenhouse gases. This mitigation measure was taken into account in the analysis of potential impacts.

B. Public Services – Police Protection

Construction: While there is the potential for the construction of the project to increase the demand for police protection services, the project provides security to the site during the construction process as part of the Work Area Traffic Control Plan, thereby reducing the demand for LAPD services. Traffic generated by construction workers and trucks is primarily during off-peak hours. Emergency access is to be maintained to the project site during construction through marked emergency access points approved by the LAPD. Therefore, police protection impacts during construction are less than significant.
Operation: The project is served by the Newton Community Police Station. The average response time to emergency calls for service for the Newton Community Station in 2013 was approximately six minutes. This response time is slightly above the citywide average of 5.9 minutes recorded during 2013, but below the seven-minute response time that is a set standard for LAPD. Using the existing

officer to population ratio for the Newton Station, the project could warrant the addition of 5 to 14 new officers to maintain the existing officer to population ratio in the Newton Community Police Station service area. However, it is not anticipated that this level of additional staffing requires the enlargement or the construction of a police station. In addition, project features that deter crime could include, but are not limited to, adequate and strategically positioned functional lighting to enhance public safety, minimizing visually obstructed and infrequently accessed "dead zones," and limiting public access to properly patrolled public areas. The building and layout design also include crime prevention features, such as nighttime security lighting, secured parking facilities, and provision of on-site security service, which comply with the design guidelines outlined in the LAPD Design Out Crime Guidelines and Mitigation Measure MM-PS-1. Response times should not be substantially affected given that the significant traffic impacts are at limited locations and given the availability of alternative routes within the street pattern in the area surrounding the project site. In addition, the police have a variety of options to avoid traffic, such as using sirens to clear a path of travel for driving in the lanes of opposing traffic. Furthermore, upon completion of the project, the Newton Area Commanding Officer has to provide a diagram of each portion of the property to show access routes and any additional information that may facilitate police response to the project site. Therefore, the project results in less than significant operational impacts on police protection services. Nevertheless, the following mitigation measures reduce the less-than-significant impacts.

1. Mitigation Measure

The City finds that Mitigation Measures MM-PS-1 and MM-PS-2, which are incorporated into the project and incorporated into these Findings as fully set forth herein, will lessen the less than significant impacts related to Public Services – Police Protection and that implementation of these mitigation measures ensure that impacts remain less than significant. These mitigation measures were taken into account in the analysis of potential impacts.

VIII. ENVIRONMENTAL IMPACTS FOUND TO BE LESS THAN SIGNIFICANT AFTER MITIGATION

The following impact area was concluded by the Draft EIR to be less than significant with the implementation of mitigation measures described in the Final EIR. Based on that analysis and other evidence in the administrative record relating to the project, the City finds and determines that mitigation measures described in the Final EIR reduce potentially significant impacts identified for the following environmental impact categories to below the level of significance.

A. Cultural Resources

Paleontological Resources (Construction Impacts): Construction of the project includes excavations for subterranean parking, foundations, and utilities installation, which have

the potential to disturb any existing, but undiscovered, paleontological resources. If paleontological resources exist within the project site, they are likely to exist in native (i.e., undisturbed) sediments at depth, since previous development of the project site has likely displaced any resources on the surface. Therefore, the potential to encounter paleontological resources is low.

Cumulative Impacts: It is not known at this time if future development of the Related Project sites would involve paleontological resources. However, similar to the project, the Related Projects are subject to the requirements of CEQA, and City paleontological resource protection ordinances.

1. Mitigation Measures

The City finds that Mitigation Measures MM-CUL-1, MM-CUL-2, and MM-CUL-3, which are incorporated into the project and incorporated into these Findings as set forth herein, reduce the impacts related to paleontological resources to less than significant. These mitigation measures were taken into account in the analysis of project impacts.

2. Finding

Paleontological Resources: With implementation of the Mitigation Measures MM-CUL-1, MM-CUL-2 and MM-CUL-3, impacts related to paleontological resources are less than significant. No further mitigation measure is required. With implementation of MM-CUL-1, MM-CUL-2 and MM-CUL-3, the project's contribution to cumulative impacts related to paleontological resources is less than significant.

3. Rationale for Finding

Paleontological Resources: There are no known paleontological sites within the project site. Furthermore, the project site is not in an area designated by the City General Plan Framework Element EIR or the Environmental and Public Facilities Maps of the Department of City Planning as a paleontological site or survey area. However, excavations are anticipated for the project for subterranean parking, foundations, and utilities installation – thereby creating the potential to disturb any existing, but undiscovered, paleontological resources. Nonetheless, changes or alterations and mitigation measures have been required in, or incorporated into, the project that avoid or substantially lessen potential significant environmental effects on paleontological resources. Mitigation Measure MM-CUL-1 calls for halting or diverting work if paleontological materials are encountered during the course of earth-moving activities to allow the resources and their significance to be assessed. MM-CUL-1 is to be memorialized with a covenant and agreement prior to obtaining a grading permit. Mitigation Measure MM-CUL-2 requires the project's construction superintendent to be instructed by a paleontologist or other qualified paleontological monitor regarding identification of conditions whereby potential paleontological resources could occur. In addition, Mitigation Measure MM-CUL-3 requires all significant fossil specimens be prepared, identified, curated and catalogued in accordance with designated museum

repository requirements. Therefore, the project's paleontological impacts are less than significant with the implementation of mitigation measures MM-CUL-1, MM-CUL-2, and MM-CUL-3.

Cumulative Impacts: The geographic scope of the cumulative cultural resources analysis with respect to paleontological resources is the project vicinity. Paleontological resource impacts tend to be localized; therefore, the area near the project site could be most affected by project activities (generally within a 500-foot radius). Nevertheless, all of the Related Project sites were considered in the EIR analysis. It is not known at this time if future development of the Related Project sites would involve paleontological resources. However, similar to the project, the Related Projects are subject to the requirements of CEQA, and City paleontological resource protection ordinances. As such, the Related Projects are evaluated on a case-by-case basis and any potential impacts to paleontological resources are addressed at that time. It is further anticipated that the effects of cumulative development on paleontological resources would be mitigated to the extent feasible in accordance with CEQA and other applicable local cultural resource protection ordinances. If subsurface paleontological resources are protected upon discovery as required by law, impacts to those resources are expected to be cumulatively less than significant and, thus, when evaluated in conjunction with the project, are not cumulatively considerable.

4. Reference

For a complete discussion of impacts associated with Cultural Resources, please see Section IV.E.3 of the Draft EIR.

B. Hazards and Hazardous Materials

Impacts of Hazardous Materials - Radon Only: Construction of the project involves the use of hazardous materials (i.e., paints, building materials, cleaners, fuel for construction equipment, etc.). Operation of the project does not include hazardous materials, other than small quantities of typical household, vehicle, and landscape maintenance materials such as cleaning supplies, paints, oil, grease, and fertilizers, all in accordance with manufacturers' instructions for use, storage, and disposal. The project site is within a zone designated by the California Geological Survey as having a Moderate potential to experience radon levels over 4.0 pCi/L, resulting in a potentially significant impact.

1. Mitigation Measures

The City finds that Mitigation Measure MM-HAZ-1, which is incorporated into the project and incorporated into these Findings as fully set forth herein, reduces the potentially significant impact related to radon to less than significant and is, therefore, required. This mitigation measure was taken into account in the analysis of potential impacts.

2. Findings

Changes or alterations and mitigation measures have been required in, or incorporated into, the project that avoid or substantially lessen potential significant environmental effects on hazards associated with radon exposure to less than significant levels with the implementation of mitigation measure MM-HAZ-1. No further mitigation is required.

4. Rationale for Findings

The project site is located within a zone designated by the California Geological Survey (CGS) as having a Moderate potential to experience radon levels over 4.0 pCi/L. According to the CGS, location within a Moderate radon potential zone indicates a less than 10% likelihood of encountering radon levels over 4.0 pCi/L. Nonetheless, the potential to encounter such radon levels at the project site is potentially significant. Measurement of radon gas levels prior to construction, and inclusion of modifications in the design of the project, if warranted, reduce the impact of radon levels over 4.0 pCi/L to less than significant, if levels over 4.0 pCi/L are encountered. Potential mitigation measures for radon levels over 4.0 pCi/L include installation of soil suction systems that prevent radon gas present in the surrounding soil from entering buildings, sealing of underground paths into project buildings, and installation of gas-impermeable barriers in project buildings. With implementation of MM-HAZ-1, requiring a mitigation program to be designed by a certified radon mitigator if radon levels over 4.0 pCi/L are encountered within, or immediately adjacent to, the project site, impacts related to radon hazards are less than significant.

5. Reference

For a complete discussion of impacts associated with Hazards and Hazardous Materials, please see Section IV.H of the Draft EIR.

C. Noise

Construction of the West Block, including demolition, grading and construction, is expected to require approximately 30 months, while construction of the East Block, including demolition, excavation and construction, would require approximately 32 months. These construction activities will result in potentially significant noise.

1. Mitigation Measures

The City finds that Mitigation Measures MM-NOI-1, MM-NOI-2, MM-NOI-3 and MM-NOI-4, which are incorporated into the project and incorporated into these Findings as fully set forth herein, reduce the potentially significant impacts related to construction noise to less than significant levels. These mitigation measures were taken into account in the analysis of potential impacts.

2. Findings

The City finds that changes or alterations and mitigation measures have been required in, or incorporated into, the project that avoid or substantially lessen potential significant construction noise impacts to less than significant levels with the implementation Mitigation Measures MM-NOI-1, MM-NOI-2, MM-NOI-3, and MM-NOI-4. No further mitigation is required.

3. Rationale for Findings

Each stage of project construction involves the use of various types of construction equipment that have their own distinct noise characteristics. The Federal Highway Administration has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. These data are presented in Table IV.K-8 of the Draft EIR for the types of equipment that are expected to be used at the project site. To more accurately characterize construction-period noise levels, the average (Hourly Leq) noise level associated with each construction stage is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage. Table IV.K-9 and Table IV.K-10 of the Draft EIR provide the estimated construction noise levels for various construction stages at the off-site noise sensitive receptors for the construction of the West Block and East Block, respectively. As indicated in Table IV.K-9, the estimated construction related noise impacts from the West Block construction is less than significant at all off-site sensitive receptors. Even though the estimated construction noise levels at receptor R1 exceeds the existing ambient noise levels by more than 5 dBA, receptor R1 is not considered noise sensitive receptor. The estimated noise levels from the East Block construction, as indicated in IV.K-10, result in less-than-significant impacts at all off-site noise sensitive receptors, with the exception of receptor R2 – the residential building at the northwest corner of Washington Boulevard and Main Street. At receptor R2, the construction activities during demolition exceed the significance threshold by 1 dBA. Implementation of Mitigation Measure MM-NOI-1 reduce the construction-related noise levels Receptor R2 by a minimum of 5 dBA, making the noise impact less than significant. In addition, compliance with regulatory measures, the noise regulations under Section 41.40 of the LAMC and implementation of Mitigation Measures MM-NOI-2 through MM-NOI-4 reduce construction noise impacts to the maximum extent feasible, in accordance with the City of Los Angeles Noise Ordinance.
Therefore, the project's short-term construction-related noise impact are less significant with implementation of these mitigation measures.

4. Reference

For a complete discussion of impacts associated with Noise, please see Section IV.K of the Draft EIR.

IX. ENVIRONMENTAL IMPACTS FOUND TO BE SIGNIFICANT AND UNAVOIDABLE

The project results in the following impacts, which are found to be significant and unavoidable.

A. Aesthetics

Construction: Although temporary in nature, construction activities associated with the project are likely give the project site a visually unappealing quality for the duration of these activities.

Operation (Vertical Zone 3 Signage Only): Potential impacts of the project SUD signage depend on several factors, including the size, height, and location, the level of lighting and animation permitted, along with the concentration of signage (i.e., the location of multiple signs within the same area), and the locations of sensitive receptors relative to signs. High levels of animation are permitted in the Vertical Zone 3 signage on the Reef building and proposed hotel building, including Controlled Refresh I (changes every 8 seconds), and Limited Animation I (changes every two minutes). The Vertical Zone 3 signage on the Reef building is visible at some distance from the site, and be prominent because the signage can extend up to 193 feet and because of the high levels of animation permitted on this signage. The Vertical Zone 3 signage on the proposed hotel building extends up to 242 feet, and be prominent because of the permitted animation. Therefore, Vertical Zone 3 signage impacts are significant during the daytime and evening operating hours.

Light and Glare: Even though the animation of the signage within Vertical Zones 1 and 2 would be less than permitted in Vertical Zone 3, impacts of permitted east-facing signage within Vertical Zones 1 and 2 on the Reef building are significant because of the prominence of the signage concentrated at this location. Accordingly, the substantial increase in lighting from this concentration of signage substantially and adversely affects the surrounding area.

Shade/Shadow: The project shadows during the Spring and Fall Equinox cover all or part of the Rutland Apartments, a shadow sensitive residential use, for more than three hours between the hours of 8:00 AM and 4:00 PM, resulting in a significant and unavoidable impact.

1. Project Design Features

The City finds that Project Design Features PDF-AES-1, PDF-AES-2, PDF-AES-3, PDF-AES-4 and PDF-AES-5, which are incorporated into the project and incorporated into these Findings as fully set forth herein, further reduce light and glare impacts and reflect good planning and design practices currently promoted by the City. These Project Design Features were taken into account in the analysis of potential impacts.

2. Mitigation Measure

Light and Glare: The City finds that Mitigation Measure MM-AES-2, which is incorporated into the project and incorporated into these Findings as fully set forth herein, further reduces the light and glare impacts and reflects good planning and design practices currently promoted by the City and, therefore, is required. This mitigation measure was taken into account in the analysis of project impacts. However, this mitigation measure does not reduce the significant impact to a less-than-significant impact.

Shade/Shadow: There are no feasible mitigation measures the project could implement to avoid significant shadow impacts to the Rutland Apartments during the spring and fall equinox, which is caused by the angle of the sun in combination with the rotation and orbit of the earth around the sun.

3. Findings

Changes and alterations and mitigation measures, where available, have been required for or incorporated into the project to reduce unavoidable aesthetic impacts to the greatest extent possible. There are no additional measures which the City can impose to reduce aesthetic impacts to less-than-significant levels.

Construction: Even with compliance with existing regulatory measures, the temporary impacts related to construction of the project are significant and unavoidable.

Operation (Vertical Zone 3 Signage): Even with implementation of Project Design Features PDF-AES-1, 2, 3, 4, and 5, and Mitigation Measure MM-AES-2, impacts to visual character of the project site are significant and unavoidable with respect to Vertical Zone 3 animated signage during the daytime operating hours of the signage.

Light and Glare: Due to the concentration of signage on the Reef building in Vertical Zones 1, 2, and 3, including the number and size of signs permitted in these locations, impacts related to the concentration of signage on the Reef building, specifically Vertical Zone 3 signage, are significant and unavoidable.

Shade/Shadow: Shadow impacts of the project on the Rutland Apartments during the spring and fall equinox would be significant and unavoidable.

4. Rationale for Findings

Construction: Although temporary in nature, construction activities give the project site a visually unappealing quality for the duration of 60 months. Temporary fencing could partially shield views of construction activities and equipment. However, construction activities typically include both a disturbance in existing natural and man-made features and the development of structures, which, at least temporarily, are devoid of external treatments designed to improve visual character. Temporary construction-related towers and cranes could also interfere with existing view lines. Therefore, construction activities

result in temporary changes as viewed from nearby viewsheds. Even with compliance with regulatory measures, the temporary impacts related to construction of the project are significant and unavoidable.

Operation (Vertical Zone 3 Signage Only):-Since the Final EIR was prepared, changes were incorporated into the project's signage program. As set forth below, these changes would not result in new significant environmental effects, or substantial increase in the severity of environmental effects that were previously disclosed in the Draft and Final EIR. The total proposed signage has been reduced by 164,789 square feet in size from 234,067 square feet to 69,278 square feet.

The City Council has enacted the Sign Ordinance pursuant to the provisions of Section 13.11 of the LAMC. The Sign Ordinance adopts the Reduced Signage Program that reflects substantial changes in the signage that would be permitted on project site, as compared to the parameters outlined in the Draft EIR. Notably, the total amount of signage permitted by the Reduced Signage Program is reduced by 70 percent compared to what was analyzed in the Draft EIR, from a total of 234,067 square feet to a total of 69,278 square feet of signs permitted under the Revised Signage Program. Further, the number of large signs permitted by the Reduced Signage Program is reduced from six to three, and all three large signs are to be located on the existing Reef building. The previously proposed signs on the north and east facades of the North Tower, and the north façade of the South Tower would not be permitted under the Reduced Signage Program. No Vertical Sign Zone 3 signage is permitted on the project site, except on the existing Reef building and the hotel building.

Under the Reduced Signage Program, the large signs on the existing Reef building were reduced as follows:

Reef Building
- North Elevation – 24,202 sq. ft. to 13,887 sq. ft. (43% reduction)
- East Elevation – 23,050 sq. ft. to 13,665 sq. ft. (41% reduction)
- West Elevation – 23,050 sq. ft. to 13,665 sq. ft. (41% reduction)

Under the Reduced Signage Program, the shape of the signage on the North Elevation of the existing Reef building was changed slightly, to rectangular in shape, whereas the Draft EIR showed this sign following the roof line of the existing Reef building, resulting in a "notch" in the middle of the sign.

In addition, Vertical Sign Zone 3 signage on the hotel building was reduced from 14,520 square feet to a maximum of 8,580 square feet, a 41 percent reduction compared to the Draft EIR analysis.

The animation allowed on the Vertical Sign Zone 3 signs under the Reduced Signage Program is the same as permitted and analyzed in the Draft EIR. The operating hours of Limited Animation I and Controlled Animation I signage on the existing Reef building are changed to 7:00 a.m. to 11:00 p.m. Sunday through Thursday, and 7:00 a.m. to 12:00

midnight Friday and Saturday.

The Draft EIR analysis of the impacts from the different views are incorporated into these Findings as though fully set forth herein and its conclusions are summarized as follows. The Reduced Signage Program would not result in new significant environmental effects, or substantial increase in the severity of environmental effects that were previously disclosed in the Draft EIR. The total proposed signage has been reduced by 164,789 square feet in size from 234,067 square feet to 69,278 square feet.From the areas surrounding the project site, including the Superior Court building, LATTC, Hill Street, Washington Boulevard, and other streets to the west of the project site, signage located on the west façade of the existing Reef building, the west façade of the North Tower, the west façade of the South Tower, and the west façade of the Hotel would be visible. Project signage that would have been permitted under the Reef Project SUD included four large sign areas – the existing Reef building (23,050 square feet in Vertical Zone 3, and 9,700 square feet in Vertical Zone 2); North Tower (14,858 square feet in Vertical Zone 2); and South Tower (15,480 square feet in Vertical Zone 2). The original proposal included high levels of animation in the Vertical Zone 3 signage on the existing Reef building and the Hotel building, including Controlled Refresh I (changes every 8 seconds), and Limited Animation I (changes every two minutes). The Vertical Zone 3 signage on the existing Reef building would be visible at some distance from the project site, and would be prominent because of the elevation to which this signage can extend (up to 193 feet), and the high levels of animation that would be permitted on this signage. The Vertical Zone 3 signage on the Hotel building could extend to a greater height (up to 242 feet) even though the permitted signage area would be smaller than for the existing Reef building.

Impacts of permitted north-, east-, south-, and west-facing Vertical Zone 3 signage on the existing Reef building, and the Hotel building would be significant with respect to aesthetics/visual quality, because this signage would be prominent and visible from long distances. In addition, since the prominence of these signs would be attributable to the allowed levels of animation, such that the signs would have a visual identity that would be separate from the buildings on which they are located, the proposed Vertical Zone 3 signs would not themselves contribute to the aesthetic image of an urban center for this area that would result from the project, when viewed from beyond the project site.

Implementation of Mitigation Measure MM-AES-2, which limits the operating hours of Sign Level 3 signage to address the lighting impact associated with this signage, would reduce the visual impact of this signage during nighttime hours to less than significant. However, the impact would remain during the daytime and evening hours when the signage is in operation. Under these conditions, this signage would be prominent and would not contribute to the desired aesthetic image of an urban center, which would constitute a significant impact. Reduction of signage and limitation of animation as a means of mitigating this impact are discussed in Section VI, Alternatives, of the Draft EIR. However, the City finds these alternatives to be infeasible as more fully explained in the Sections X and XII of these Findings. Therefore, impacts to visual character of the Project Site would be significant and unavoidable with respect to Vertical Zone 3 animated

signage during the daytime and evening operating hours of the signage. Impacts during nighttime hours would be less than significant.

Reduced Signage Program. The potential environmental effects of the Reduced Signage Program related to visual quality is lower than what was analyzed in the Draft EIR. The assessment of a significant and unavoidable impact related to Vertical Sign Zone 3 signage in the Draft EIR was based upon the size and animation of the signs. Under the Reduced Signage Program, three Vertical Sign Zone 3 signs on the North Tower and South Tower were removed from the program. Accordingly, the significant and unavoidable visual quality impacts of these signs would be avoided under the Reduced Signage Program. In addition, the impact of the Vertical Sign Zone 3 sign that would have been located on the east façade of the North Tower, which would have been visible from the residential neighborhood located to the southeast of the project site, will be avoided. The Vertical Sign Zone 3 signs on the existing Reef building was reduced in size by approximately 40 percent. High levels of animation (Controlled Refresh I and Limited Animation I) will continue to be permitted in these signs. Accordingly, the significant and unavoidable visual quality impacts of these signs will be reduced, but not eliminated under the Reduced Signage Program.

Lighting With respect to the potential for light intensity levels to exceed 2.0 footcandles at any residential property line outside of the project site, an updated lighting report was prepared for the Reduced Signage Program. This report calculated the lighting levels to which the Reduced Signage Program signage would need to be limited in order to ensure that light intensity levels would not exceed 2.0 footcandles at any residential property line outside of the project site. These levels are included as a design condition in the Sign Ordinance that implements the Reduced Signage Program. Accordingly, impact would remain less than significant under the Reduced Signage Program. With respect to the visibility of signage to freeway drivers, the updated lighting report demonstrates that project's signage is not located within 10 degrees of drivers' lines of sight, and that brightness would exceed allowable levels. Moreover, the removal of the Vertical Sign Zone 3 signage from the North Tower and South Tower reduced the impact compared to what was analyzed in the Draft EIR. Accordingly, this impact remains less than significant.

The potential environmental effects of the Reduced Signage Program related to lighting are lower than what was analyzed in the Draft EIR. The significant lighting impact related to Vertical Sign Zone 3 signage on the North and South Towers do not occur under the Reduced Signage Program. This modification in the signage program also avoids the impact of the sign that would have been located on the east façade of the North Tower, which would have been visible from the residential neighborhood located to the southeast of the project site.

Significant lighting impacts related to the concentration of signage on the existing Reef building were reduced under the Reduced Signage Program. The significant impacts associated with concentration of signage on the existing Reef building in Vertical Zones 1, 2, and 3 are related to the number, size and animation of signs that is permitted in

these locations. Under the Reduced Signage Program, the size of permitted signs was reduced by approximately 40 percent. The number of signs and the permitted levels of animation is the same. Although the shape of the signage on the north elevation of The Reef would change slightly under the Reduced Signage Program, sign shape was not a factor in determining impacts of signage in the Draft and Final EIR. Accordingly, the significant and unavoidable lighting impacts of these signs was reduced, but not eliminated under the Reduced Signage Program.

Under the Reduced Signage Program, the operating hours of Limited Animation I and Controlled Refresh I Vertical Sign Zone 3 signage on the existing Reef building increased by one hour Sunday through Thursday, and by two hours Friday and Saturday. The change in hours of operation do not change the finding that these signs have a significant and unavoidable impact related to lighting because this impact is related to the number, size and animation of signs, and is not related to the hours of operation. Moreover, this increase in operating hours would occur at a location on the project site that is not adjacent to any sensitive receptor. The impact of the signage on the existing Reef building would continue to be significant and unavoidable as identified in the Draft EIR.

Modifications to the existing Reef building signage as contained in the Reduced Signage Program would not result in any new significant impacts, or substantial increase in the severity of previously identified impacts; it would result in a reduction of significant and unavoidable impacts. Accordingly, recirculation of the EIR to address the changes in the project's signage program is not required.

Light and Glare Operational Impacts: The project would introduce new signage elements into the area of the project site, which currently contains limited signage.

From the areas surrounding the project site, including the residential neighborhood to the southeast, and the commercial/industrial area, with limited residential uses, Main Street, Broadway, Hill Street, 21st Street, and other streets to the south of the project site, signage located on the south façade of the Hotel would be visible. Project signage that would be permitted under the proposed Reef Project SUD would not include large sign areas, with south-facing signage limited to 1,364 square feet in Vertical Zone 3 at the top of the Hotel Building. High levels of animation would be permitted in the Vertical Zone 3 signage on the Hotel building, including Controlled Refresh I (changes every 8 seconds), and Limited Animation I (changes every two minutes). The Vertical Zone 3 signage on the Hotel Building could extend to a height of up to 242 feet), and would be prominent because of the permitted animation, even though the permitted signage area would be smaller. Views of Vertical Zone 1 signage would be limited to the streets and sidewalks located at the southern edge of the project site.

Based on the criteria listed above, impacts of permitted east-facing signage within Vertical Zones 1 and 2 on the existing Reef building would be significant because the concentration of signage at this location would contribute to the prominence of the

signage, even though the animation of the signage within Vertical Zones 1 and 2 would be less than permitted in Vertical Zone 3. Accordingly, the substantial increase in lighting that would result from this concentration of signage would substantially and adversely affect the surrounding area. Therefore, impacts related to the concentration of signage on the Reef building would be significant and unavoidable.

Shade/Shadow: Shadow figures for buildout of the project are shown in Figure IV.B-16 (Project Summer Solstice Shadows); Figure IV.B-17 (Project Winter Solstice Shadows); and Figure IV.B-18. While Summer and Winter shadows are less than significant, Equinox shadows are significant. As shown in Figure IV.B-18 of the Draft EIR, the project casts far-reaching shadows to the west through the east during the Spring and Fall Equinox. These shadows shade commercial uses directly north of the project site, a corner of the four-story mixed-use Da Capo building, which includes the Rutland Apartments, to the north, and portions of South Hill Street and West Washington Boulevard. At 4:00 PM spring and fall shadows from the project are cast in a northeasterly direction. These shadows shade commercial uses directly north of the project site, the Rutland Apartments, a portion of South Hill Street, portions of West Washington Boulevard, and extend to the Santa Monica Freeway. These shadow impacts exceed the LA CEQA Thresholds Guide shade/shadow thresholds and, therefore, impacts are significant and unavoidable.

5. Reference

For a complete discussion of impacts associated with Aesthetics, please see Section IV.B of the Draft EIR.

B. Air Quality

1. Violation of Air Quality Standards or Substantial Contribution to Air Quality Violations

Mass Daily Construction Emissions (VOC Only): Based on conservative assumptions, the mass daily construction-related emissions generated during the project construction phase exceeds the thresholds of significance recommended by the SCAQMD for VOC only.

Mass Daily Operational Emissions (VOC and NO_x Only): The nearest sensitive receptors to the project site are the residents of the Rutland Apartments building located across Washington Boulevard from the East Block, approximately 100 feet north of the project site. The closest schools to the project site are the Santee Education Complex and Frida Kahlo Continuation High School located approximately one block east. VOC and NO_x operational emissions are significant and unavoidable at these sites.

Mass Daily Construction and Operational Emissions Cumulative Impacts – VOC (Construction and Operation) and NO_x (Operation Only): The mass daily construction-related and operational emissions generated by the project exceed thresholds of significance recommended by the SCAQMD for VOC (construction and operations) and

NO_x (operations). In accordance with SCAQMD guidance, these emissions are cumulatively considerable.

2. Freeway Adjacent Health Risk

The project is located in close proximity to the 10 Freeway and therefore a Health Risk Assessment was prepared to evaluate potential cancer risks associated with the project. The assessment found the cancer risk for the residential scenarios of the project ranges from 17.7 to 29.2 per one million, which exceeds the SCAQMD stationary source threshold of 10 in one million.

3. Project Design Features

The City finds that Project Design Features PDF-AQ-1, PDF-AQ-2, PDF-AQ-3, PDF-AQ-4, PDF-AQ-5 and PDF-AQ-6, which are incorporated into the project and incorporated into these Findings as fully set forth herein, reduce the potential air quality impacts of the project. These Project Design Features were taken into account in the analysis of potential impacts.

4. Mitigation Measures

Mass Daily Construction Emissions – VOC Only; Mass Daily Operational Emissions – VOC and NO_x Only; and Mass Daily Construction and Operational Emissions Cumulative Impacts – VOC (Construction and Operation) and NO_x (Operation) Only: Since the project results in potentially significant air quality impacts related to VOC and NO_x, and Mass Daily Construction and Operational Emissions Cumulative Impacts for VOC (Construction and Operation) and NO_x (Operation) only, the City finds that Mitigation Measure MM-TR-13, which is incorporated into the project and incorporated into these Findings as fully set forth herein, further reduces the air quality impacts and reflects good planning and design practices currently promoted by the City and, therefore, is required. This mitigation measure was taken into account in the analysis of project impacts.

Freeway Adjacent Health Risk: Since the project results in potentially significant air quality impacts related to Freeway Adjacent Health Risk, the City finds that Mitigation Measures MM-AQ-1, MM-AQ-2, MM-AQ-3, MM-AQ-4 and MM-AQ-5, which are incorporated into the project and incorporated into these Findings as fully set forth herein, further reduce the air quality impacts and reflect good planning and design practices currently promoted by the City and, therefore, are required. These mitigation measures were taken into account in the analysis of project impacts.

5. Findings

The City finds that changes and alterations and mitigation measures were made to the project to reduce the significant air quality impacts of the project. No additional measures are available to reduce these impacts to less-than-significant levels. Specifically:

Mass Daily Construction Emissions (VOC Only): Mass daily construction emissions for VOC generated during project construction are significant and unavoidable.
Mass Daily Operational Emissions (VOC and NO_x Only): Mass daily operational emissions for VOC and NO_x are significant and unavoidable.

Mass Daily Construction and Operational Emissions Cumulative Impacts - VOC (Construction and Operation) and NO_x (Operation) Only: Cumulative impacts with respect to VOC during construction and operation and NO_x during operation only are significant and unavoidable.

Freeway Adjacent Health Risk: Freeway adjacent health risks are conservatively assessed to be significant and unavoidable, although these risks are associated with the existing environment, and are not a direct or indirect environmental effect of the project.

5. Rationale for Findings

Mass Daily Construction Emissions (VOC Only): The analysis of mass daily construction emissions was prepared utilizing CalEEMod recommended by the SCAQMD with the assumption that the project comply with the fugitive dust control requirements of SCAQMD Rule 403. The mass daily construction-related emissions are shown in Table IV.C-7 of the Draft EIR. As shown in Table IV.C-7, mass daily construction emissions for VOC generated during project construction exceed the thresholds of significance recommended by the SCAQMD. The SCAQMD threshold of significance for VOC is 75 pounds per day, and the estimated mass daily construction emissions of the project is 129 pounds per day. Therefore, construction emissions with respect to VOC only would be significant and unavoidable.

Mass Daily Operational Emissions (VOC and NO_x Only): According to the analysis shown in Table IV.C.-8 (Estimated Mass Daily Operational Emissions) of the Draft EIR, the SCAQMD threshold of significance for VOC is 55 pounds per day, and the estimated project net increase in mass daily operational emissions is 76 pounds per day. Similarly, the SCAQMD threshold of significance for NO_x is 55 pounds per day, and the estimated project net increase in mass daily operational emissions is 60 pounds per day. Therefore, VOC and NO_x operational emissions are significant and unavoidable.

Mass Daily Construction and Operational Emissions Cumulative Impacts – VOC (Construction and Operation) and NO_x (Operation) Only: Mass daily construction emissions for VOC generated during project construction exceed the thresholds of significance recommended by the SCAQMD. Therefore, the mass daily construction-related and operational emissions generated by the project exceed thresholds of significance recommended by the SCAQMD for VOC (construction and operations) and NO_x (operations).

Freeway Adjacent Health Risk: As shown in Table 6 in Appendix IV.C-2 to the Draft EIR, the summation of carcinogenic risk from all primary Mobile Source Air Toxics (MSATs – diesel particulate matter (DPM), formaldehyde, 1,3 butadiene, benzene,

acrolein, acetaldehyde, and naphthalene) for the worst-case ground level location at the project site totaled a carcinogenic risk of 17.7 per one million for the 9-year residential scenario, 24.8 per one million for the 30-year residential scenario, 29.2 per one million for the 70-year residential scenario, and 1.6 per one million for the 25-year worker scenario. The cancer risk of 1.6 per one million for the 25-year worker scenario is below the SCAQMD stationary source threshold of 10 in one million. However, the cancer risk for the residential scenarios ranges from 17.7 to 29.2 per one million, which exceeds the SCAQMD stationary source threshold of 10 in one million. Therefore, the EIR conservatively concludes that the cancer risk from freeway sources on project residents is significant because of the exceedance of the SCAQMD stationary source cancer risk threshold.

6. Reference

For a complete discussion of impacts associated with Air Quality, please see Section IV.C of the Draft EIR.

C. Noise

Cumulative Construction Impacts and Operation Impacts – 17th Street west of Hill Street: Development of the project in conjunction with the other Related Projects results in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City. If it was constructed concurrently with the project, construction of Related Project No. 53, a residential development located at 220 E. Washington Boulevard, approximately 600 feet east of the project site, could cause cumulative construction noise impacts. Additionally, the cumulative operational traffic noise impact on 17th Street west of Hill Street, where there are residential land uses, is significant and unavoidable.

1. Mitigation Measures

The City finds that all feasible mitigation measures to reduce cumulative construction noise and cumulative traffic noise impacts have been imposed and that there are no further feasible mitigation measures the project could implement to avoid significant cumulative traffic noise impacts at 17th Street west of Hill Street or the potential significant cumulative construction noise impacts if construction for Related Project 53 were to overlap with the construction schedule for the project.

2. Findings

Cumulative Construction Noise Impacts: The cumulative construction causes significant and unavoidable impacts if Related Project 53 is constructed concurrently with the project.

Cumulative Operation Noise Impacts: The cumulative operational traffic noise impact on the residential uses on 17th Street west of Hill Street is significant and avoidable.

3. Rationale for Findings

Cumulative Construction: The following Related Projects are within 1,000 feet of the project site and could cause cumulative construction noise impacts: (i) Related Project No. 6, the LA Trade Technical College – 5-Year Master Plan is located at 400 W. Washington Boulevard, approximately 350 feet west; (ii) Related Project No. 42, a Mixed-Use Building development located at 233 W. Washington Boulevard, approximately 400 northwest; and (iii) Related Project No. 53, the Washington Boulevard Opportunity MU (Mercy Housing), a residential development located at 220 E. Washington Boulevard, approximately 600 feet east. The existing residential building at the northwest corner of Washington Boulevard and Main Street (represented by Receptor R2) has direct line-of-sight to both the project and the Related Project No. 53. Therefore, if construction of Related Project No. 53 were to occur concurrently with the project, cumulative noise impacts at Receptor R2 could occur.
The mitigation measures as specified for the Related Project No. 53 and the project would reduce the construction noise at the residential building at the northwest corner of Washington Boulevard and Main Street. Nonetheless, even with mitigation measures, if nearby Related Project No. 53 were to be constructed concurrently with the project, it is conservatively concluded that significant and unavoidable cumulative construction noise impacts could result.

Cumulative Operation: The noise levels associated with existing traffic volumes and future year 2035 traffic volumes with the project are provided in Table IV.K-17 of the Draft EIR. The traffic generated by the project and cumulative development increase the existing traffic noise levels by 3.3 dBA Leq along 17th Street (west of Hill Street), and by 3.1 dBA at the other two locations. With respect to the 3.1 dBA increase on the Pico Boulevard (east of Main Street), and Grand Avenue (between Venice Boulevard and Washington Boulevard) segments, this increase does not constitute a significant impact because these segments contain commercial land uses. Per the L.A. CEQA Thresholds Guide, the 3 dBA threshold applies when the projected noise is within the “normally unacceptable” or “clearly unacceptable” category. The land uses along the 17th Street (west of Hill Street) segment includes residential uses. The projected noise environment on this segment would be within the “normally unacceptable” category for residential land use and the 3dBA threshold would apply. Accordingly, cumulative noise impacts on this roadway segment are significant and unavoidable.

4. Reference

For a complete discussion of impacts associated with Noise, please see Section IV.K of the Draft EIR.

D. Transportation/Circulation

Operation: Even with Mitigation Measures MM-TR-1 through MM-TR-14, there is one remaining significant impact in the AM peak hour (with this impacted intersection operating at LOS D), eight remaining significant impacts in the PM peak hour (with one

of the impacted intersections operating at LOS D, six operating at LOS E, and one operating at LOS F), seven remaining significant impacts in the Friday Evening peak hour (with two of the impacted intersections operating at LOS D or better, one operating at LOS E, and four operating at LOS F), and one remaining significant impact in the Saturday Midday peak hour (the impacted intersections operating at LOS C). Mitigation Measure MM-TR-14 reduces the significant impact at the project's Main Street driveway to less than significant. However, this mitigation measure requires modifications to the Sports Museum driveways, which are located on private property outside the control of the project applicant, and would therefore require the concurrence of the Sports Museum property owner. In the event the Sports Museum property owner does not agree to the modifications, Mitigation Measure MM-TR-14 are infeasible and impacts at this location are significant and unavoidable.

1. Project Design Features

The City finds that Project Design Feature PDF-TR-1, which is incorporated into the project and incorporated into the Findings as fully set forth herein, reduce the potential operational traffic impacts of the project. This Project Design Feature was taken into account in the analysis of potential impacts.

2. Mitigation Measures

The City finds that Mitigation Measures MM-TR1, MM-TR-2, MM-TR-3, MM-TR-4, MM-TR-5, MM-TR-6, MM-TR-7, MM-TR-8, MM-TR-9, MM-TR-10, MM-TR-11, MM-TR-12, MM-TR-13 and MM-TR-14, which are incorporated into the project and incorporated into these Findings as fully set forth herein, are included to further reduce the operational traffic impacts and reflect good planning and design practices currently promoted by the City. These mitigation measures were taken into account in the analysis of project impacts.

3. Findings

Changes and alterations and mitigation measures, where available, have been required for or incorporated into the project to reduce unavoidable operational traffic impacts to the greatest extent possible. There are no additional measures which the City can impose to reduce the unavoidable operational traffic impacts to less-than-significant levels.

Specifically:

Operation – Intersections: Even with implementation of the mitigation measures, there is one remaining significant impact in the AM peak hour, eight remaining significant impacts in the PM peak hour, seven remaining significant impacts in the Friday Evening peak hour, and one remaining significant impact in the Saturday Midday peak hour.

Operation – Driveway: With implementation of Mitigation Measure MM-TR-14, impacts from the project's Main Street driveway are less than significant. However, since this Mitigation Measure requires the approval of modifications to private property not within the control of the City, the City finds that without the cooperation of the Sports Museum

Property Owner, this Mitigation Measure is infeasible and impacts at this location are significant and unavoidable.

4. Rationale for Findings

Operation: Tables 7.2 through 7.5 in the Traffic Study (Appendix N to the Draft EIR) show the change in V/C at the significantly impacted intersections after implementation of the mitigation measures, and compare these changes to LADOT significance criteria to determine whether the impacts at the intersections are significant after mitigation. Intersections identified in these tables as “Partially Mitigated” would not have their impacts reduced below the threshold of significance, and these impacts are significant and unavoidable. There are no additional feasible mitigation measures which can be imposed to reduce the operational traffic impacts to these intersections to a less-than-significant level.

Driveway: The project Main Street driveway adversely impacts the Sports Museum driveways, which are located across Main Street from the project site. Implementation of Mitigation Measure MM-TR-14 reduces the impact at this location to less than significant. In the event the Sports Museum property owner does not agree to the modifications associated with Mitigation Measure MM-TR-14 on the Sports Museum property, Mitigation Measure MM-TR-14 is considered infeasible and impacts at this location are significant and unavoidable.

5. Reference

For a complete discussion of impacts associated with Transportation/Circulation, please see Section IV.N of the Draft EIR.

X. ALTERNATIVES TO THE PROJECT

In addition to the project, the Draft EIR evaluated a reasonable range of five alternatives to the project. These alternatives are: (1) No Project Alternative; (2) Alternative Use (Office Campus); (3) Reduced Height/Reduced Signage; (4) Reduced Density; and (5) Existing Zoning (Industrial). In accordance with CEQA requirements, the alternatives to the project include a “No Project” alternative and alternatives capable of eliminating the significant adverse impacts of the project. These alternatives and their impacts, which are summarized below, are more fully described in section VI of the Draft EIR.

A. Summary of Findings

Based upon the following analysis, the City finds, pursuant to CEQA Guidelines section 15096(g)(2), that none of the alternatives or feasible mitigation measures within its powers would substantially lessen or avoid any significant effect the project would have on the environment.

B. Project Objectives

An important consideration in the analysis of alternatives to the project is the degree to which such alternatives would achieve the objectives of the project. As more thoroughly described in the Draft EIR Section II, Project Description, both the City and applicant have established specific objectives concerning the project, which are incorporated by reference herein and discussed further below.

C. Project Alternatives Analyzed

1. Alternative 1 – No Project Alternative

Under the No Project Alternative, the project would not be constructed, and the project site would remain in its current condition with the existing 861,162 square foot, 12-story plus basement Reef building, surface parking lots with approximately 1,100 parking spaces, and an approximately 11,150 square foot warehouse building. The analysis of the No Project Alternative assumes the continuation of existing conditions, as well as development of the Related Projects described in Draft EIR Section III. Environmental Setting.

Impact Summary: The project results in significant and unavoidable impacts related to visual quality, light and glare, shade/shadow, air quality, traffic noise, and transportation, which would be avoided under the No Project Alternative. The No Project Alternative would avoid most of the project's less-than-significant impacts as well. The No Project Alternative does not have potentially beneficial impacts resulting from the project with respect to water quality, and would not implement any regional or local planning policies.

Findings: The No Project Alternative reduces adverse environmental impacts compared to the project. Therefore, the No Project Alternative is environmentally superior to the project. However, the No Project Alternative does not satisfy any of the Project Objectives, discussed below. It is found, pursuant to Public Resources Code section 21081, subsection (a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible the No Project Alternative described in the Draft EIR.

Rationale for Findings: The No Project Alternative maintains the project site in its current condition with the existing 861,162 square foot, 12-story plus basement Reef building, surface parking lots with approximately 1,100 parking spaces, and an approximately 11,150 square foot warehouse building. However, there would be no renovation, construction, use and maintenance of a mixed-use project. As a result, the No Project Alternative does not create 1,444 housing units, nor generate approximately 3,808 employees. In addition, the No Project Alternative does not create community serving amenities such as: (i) 67,702 square feet of retail/restaurant uses; (ii) a 29,355 square-foot grocery store; (iii) a 17,507 square-foot gallery; (iv) a 7,879 square foot fitness/yoga studio. There also would not be approximately 1,906 bicycle parking spaces providing

connectivity to the nearby bus and light rail lines. Therefore, the No Project Alternative would not meet any of the Project Objectives.

Reference: For a complete discussion of impacts associated with Alternative 1, please see Section VI of the Draft EIR.

2. Alternative 2 – Alternate Use (Office Campus)

Under the Alternate Use Alternative, the project site is developed with a mix of office and retail commercial uses at the same density as the project, but does not result in the construction of any of the residential or hotel uses as the project. Since an office complex with supporting retail uses is permitted under the current General Plan land use designation and zoning for the project site, Alternative 2 does not require a General Plan Amendment and Zone Change. The project, on the other hand, does require a General Plan Amendment and Zone Change. Under Alternative 2, the Reef building also remains in its current location and up to 180,000 square feet of the space is to be reconfigured into creative office space. In addition, up to 30,000 square feet of existing floor area on the ground floor may be converted to 20,000 square feet of retail space and 10,000 square feet of restaurant space. The addition of the 8,000 square foot rooftop restaurant in the Reef building is not be included under this alternative. Under the Alternate Use Alternative, 1,625,538 square feet of new office uses are provided within five new buildings, including two six-story buildings, a 12-story building, and two high-rise buildings, 19 and 31 stories, respectively. Up to 54,364 square feet of new retail uses would be provided on the ground floors of the office buildings, located throughout the campus. Coupled with the square footage within the Reef building, the Alternate Land Use Alternative includes 2,017,932 square feet of office, 369,063 square feet of wholesale/showroom use, 69,705 square feet of event space, and 84,364 square feet of retail and restaurant uses. The development density of this alternative is 6.0:1. Parking would be in a seven-story above-ground garage on the West Block, and in subterranean parking garages on the East Block, similar to the project. The Alternate Use Alternative includes the same Reef Project SUD signage program as would be provided under the project, with the same signs as identified in the Reef project SUD to be located on corresponding buildings under this Alternative (e.g., the two high rise office towers would be analogous to the North Tower and South Tower under the project, and the 12-story office building would be analogous to the project hotel building).

Impact Summary: The Alternate Use Alternative has higher significant and unavoidable impacts than the project with respect to air quality, freeway health risk, cumulative traffic noise and transportation. The Alternate Use Alternative has similar significant and unavoidable impacts as the project with respect to visual quality, light and glare, and shade/shadow. The Alternate Use Alternative has higher less-than-significant impacts than the project with respect to utilities (solid waste, electricity), and lower less-than-significant impacts than the project with respect to biological resources (trees), public services (recreation and parks, libraries), and utilities (wastewater, water, natural gas).

Findings: The Alternate Use Alternative has higher significant and unavoidable impacts than the project with respect to air quality, freeway health risk, cumulative traffic noise and transportation. The Alternate Use Alternative has similar significant and unavoidable impacts as the project with respect to visual quality, light and glare, and shade/shadow. Also, the Alternate Use Alternative has higher less-than-significant impacts than the project with respect to utilities (solid waste, electricity), and lower less-than-significant impacts than the project with respect to biological resources (trees), public services (recreation and parks, libraries), and utilities (wastewater, water, natural gas). The Alternative Use Alternative implements some of the Project Objectives, but not to the same degree as the project. It is found, pursuant to Public Resources Code section 21081, subsection (a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible the Alternate Use Alternative described in the Draft EIR.

Rationale for Findings: The Alternate Use Alternative would mean the absence of the development of, among other elements of the project, (i) 549 residential apartment units, including 21 live/work units, in eleven low- and mid-rise buildings; (ii) 895 residential condominium units in two high-rise buildings; and (iii) a 208-key hotel. In its place would be the development of a mix of office and retail commercial uses, at the same density as the project. In addition, daily trips associated with this alternative, upon which the calculations of greenhouse gas emissions are based, would be 17,649, compared with 12,737 under the project, an increase of approximately 39 percent. Project-related GHG emissions per service population would be only slightly below the SCAQMD significance threshold. Since traffic-related emissions are a large proportion of total GHG emissions, and traffic would increase approximately 39% under the Alternate Use Alternative, GHG emissions associated with the Alternate Use Alternative exceed the significance threshold. Accordingly, impacts of this Alternative with respect to GHG emissions are higher than the project, and are therefore significant and unavoidable. Also, under the Alternative Use Alternative, new project-related vehicle trips are generated that exceed the traffic generation associated with the project, as shown in Draft EIR Table VI-4 (Trip Generation by Land Use – Alternate Use Alternative). Accordingly, impacts of this alternative would be higher than the project's significant and unavoidable impacts related to traffic.

The Alternate Use Alternative implements the following Project Objectives to a lesser degree than the project: (i) To provide the amenities necessary for the Magic Box to attract top-notch events to the City of Los Angeles (i.e., Hotel not included); (ii) To create an urban center that is compatible with and complementary to currently ongoing growth in the resident population of Downtown Los Angeles (i.e., reduced mix of uses); (iii) To generate additional annual tax revenues to the City of Los Angeles, including property taxes, sales taxes, transient occupancy taxes, and gross receipts taxes; and, (iv) To provide an integrated mixed-use project that is economically viable and serves the needs of the community and the region.

The Alternate Use Alternative does not implement the following Project Objectives because this alternative does not include housing nor create a dynamic 24-hour activity center and not have a hotel nor the restaurants, entertainment, or resident- and community-serving retail components of the project: (i) To provide for the development of an underutilized site near public transportation through the replacement of surface parking lots with new housing, retail uses, restaurants, and a hotel to meet anticipated market demands; and, (ii) To construct a complementary, integrated set of land uses and signage that promotes the creation of a vibrant and dynamic 24-hour activity center that provides the opportunity for people to live, work, and entertain.

Reference: For a complete discussion of impacts associated with Alternative 2, please see Section VI of the Draft EIR.

3. Alternative 3 – Reduced Height/Reduced Signage

Under the Reduced Height/Reduced Signage Alternative, the same uses as the project are included (residential, hotel, retail, grocery), at a slightly lower density than the project. The Reduced Height/Reduced Signage Alternative limits building heights to 12 stories/143 feet, which is generally equivalent to the prevailing heights of the tallest buildings located in the vicinity, specifically the commercial building located immediately across Washington Boulevard to the north, and the Superior Court building located immediately across Hill Street to the west. Under the Reduced Height/Reduced Signage Alternative, the Reef building remains and is modified, similar to the project, to reconfigure up to 180,000 square feet of the space currently used for wholesale/showroom operations into creative office space. In addition, up to 30,000 square feet of existing floor area on the ground floor may be converted to 20,000 square feet of retail space and 10,000 square feet of restaurant space. The addition of the 8,000 square-foot rooftop restaurant in the Reef building is included under this alternative. Under the Reduced Height/Reduced Signage Alternative, the same number of residential units (1,444) is provided as under the project. However, because of the different configurations of the residential buildings that occur under this alternative, the mix of apartments and condominiums is different. Under the Reduced Height/Reduced Signage Alternative, a total of 1,010 apartments and live /work units, and 434 condominiums are provided. Up to 101,941 square feet of new retail uses, including a 34,705 square-foot grocery store, and a 127-room hotel are included in this alternative. Coupled with the square footage within the Reef building, the development density of this alternative is approximately 5.15:1. The development under this alternative is accommodated in nine new buildings up to 12 stories in height. Parking is provided in a seven-story above-ground garage on the West Block, and in subterranean parking garages on the East Block.

Under the Reduced Height/Reduced Signage Alternative, signage follows the same framework as the project. However, because of the reduced height of buildings included in this alternative, signage within Vertical Sign Zone 3 is substantially reduced in visibility. Under the Reduced Height/Reduced Signage Alternative, signage on the Reef building is reduced in size by 50% compared to the project, and highly animated signage is not be permitted in Vertical Sign Zone 3 on the Reef building.

Impact Summary: The Reduced Height/Reduced Signage Alternative avoids the significant and unavoidable impacts of the project with respect to visual quality, light and glare, and cumulative traffic noise. The Reduced Height/Reduced Signage Alternative has the same significant and unavoidable temporary construction visual quality impacts as the project. The Reduced Height/Reduced Signage Alternative has lower, but still significant and unavoidable impacts compared to the project with respect to shade/shadow, air quality, freeway health risk, and transportation. The Reduced Height/Reduced Signage Alternative has lower less-than-significant impacts than the project with respect to public services and utilities.

Findings: The Reduced Height/Reduced Signage Alternative avoids the significant and unavoidable impacts of the project with respect to visual quality, light and glare, and cumulative traffic noise. The Reduced Height/Reduced Signage Alternative has the same significant and unavoidable temporary construction visual quality impacts as the project. The Reduced Height/Reduced Signage Alternative has lower, but still significant and unavoidable impacts compared to the project with respect to shade/shadow, air quality, freeway health risk, and transportation. The Reduced Height/Reduced Signage Alternative has lower less-than-significant impacts than the project with respect to public services and utilities. The Reduced Height/Reduced Signage Alternative implements some of the Project Objectives, but not to the same degree as the project. It is found, pursuant to Public Resources Code section 21081, subsection (a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible the Reduced Height/Reduced Signage Alternative described in the Draft EIR.

Rationale for Findings: The Reduced Height/Reduced Signage Alternative reduces building heights to 12 stories/143 feet. Under the Reduced Height/Reduced Signage Alternative, a total of 1,010 apartments and live /work units, and 434 condominiums are provided. Up to 101,941 square feet of new retail uses, including a 34,705 square-foot grocery store, and a 127-room hotel, rather than a 208-room hotel, are included in Reduced Height/Reduced Signage Alternative. Coupled with the square footage within the Reef building, the development density of this alternative is approximately 5.15:1. The development under this Alternative is accommodated in nine new buildings up to 12 stories in height. Parking is provided in a seven-story above-ground garage on the West Block, and in subterranean parking garages on the East Block. Under the Reduced Height/Reduced Signage Alternative, signage on the Reef building is reduced in size by 50% compared to the project, and highly animated signage is not be permitted in Vertical Sign Zone 3 on the Reef building.

As shown in Draft EIR Table VI-11 (Reduced Height/Reduced Signage Alternative Net Employee Generation), the Reduced Height/Reduced Signage Alternative generates approximately 3,689 employees, which results in a net increase of approximately 1,042 employees on the project site from existing conditions. The project results in a net increase of approximately 1,161 employees; therefore, this alternative results in a lower level of employment generation than the project. The Reduced Height/Reduced Signage

Alternative implements the following Project Objectives to a lesser degree than the project because this alternative does not include a dynamic 208-room hotel: (i) To provide the amenities necessary for the Magic Box to attract top-notch events to the City of Los Angeles (i.e., smaller Hotel); and, (ii) To generate additional annual tax revenues to the City of Los Angeles, including property taxes, sales taxes, transient occupancy taxes, and gross receipts taxes (i.e., smaller project).

Reference: For a complete discussion of impacts associated with Alternative 3, please see Section VI of the Draft EIR.

4. Alternative 4 – Reduced Density

Under the Reduced Density Alternative, the same uses are included as in the project (residential, hotel, retail, grocery), at a lower density than the project. Under this Alternative, the Reef building remains and is modified, similar to the project, to reconfigure up to 180,000 square feet of the space currently used for wholesale/showroom operations into creative office space. In addition, up to 30,000 square feet of existing floor area on the ground floor may be converted to 20,000 square feet of retail space and 10,000 square feet of restaurant space. The addition of the 8,000 square-foot rooftop restaurant in the Reef building is included under this alternative. Under the Reduced Density Alternative, the uses are reduced by approximately 25% compared to the project. For instance, restaurant uses are reduced from 45,657 square feet under the project to 17,959 square feet under this alternative and retail uses are reduced from 60,045 square feet under the project to 45,701 under this alternative. This alternative does not have the 17,507 square-foot Gallery or fitness/gym/yoga studio. A total of 1,069 residential units, 93 hotel rooms, and 80,406 square feet of retail uses, including a 34,705 square-foot grocery store, are included under this alternative. Because of the different configurations of the residential buildings that occur under this alternative, the mix of apartments and condominiums is different. Under the Reduced Density Alternative, a total of 535 apartments and live /work units, and 534 condominiums (rather than 895 under the project) are provided. Coupled with the square footage within the Reef building, the development density of this alternative is approximately 4.37:1. The development under this alternative is accommodated in eight new buildings up to 10 stories/121 feet in height, and a single residential tower up to 420 feet in height. Parking is provided in a seven-story above-ground garage on the West Block, and in subterranean parking garages on the East Block.

Under the Reduced Density Alternative, signage follow the same framework as the project. However, because of the reduced height of buildings included in this alternative, signage within Vertical Sign Zone 3 is substantially reduced in visibility, except for the high-rise residential tower, which includes the same signage as permitted for the South Tower under the project.

Impact Summary: The Reduced Density Alternative avoids the significant and unavoidable impacts of the project with respect to shade/shadow, and cumulative traffic noise. The Reduced Density Alternative has lower, but still significant and unavoidable

impacts compared to the project with respect to air quality, freeway health risk, and transportation. The Reduced Density Alternative has similar significant and unavoidable impacts as the project with respect to visual quality, and light and glare. The Reduced Density Alternative would have lower less-than-significant impacts than the project with respect to public services and utilities, and construction impacts.

Findings: The Reduced Density Alternative avoids the significant and unavoidable impacts of the project with respect to shade/shadow, and cumulative traffic noise. The Reduced Density Alternative has lower, but still significant and unavoidable impacts compared to the project with respect to air quality, freeway health risk, and transportation. The Reduced Density Alternative has similar significant and unavoidable impacts as the project with respect to visual quality, and light and glare. The Reduced Density Alternative has lower less-than-significant impacts than the project with respect to public services and utilities, and construction impacts.

In addition, the Reduced Density Alternative implements some of the Project Objectives, but not to the same degree as the project. It is found pursuant to Public Resources Code section 21081, subsection (a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible the Reduced Density Alternative described in the Draft EIR.

Rationale for Findings: The Reduced Density Alternative provides the same uses as the project (residential, hotel, retail, grocery), at a lower density than the project. The Reef building remains in its current location and is modified, similar to the project. Also under the Reduced Density Alternative, the uses are reduced by approximately 25% compared to the project. For instance, restaurant uses are reduced from 45,657 square feet under the project to 17,959 square feet under this alternative and retail uses are reduced from 60,045 square feet under the project to 45,701 under this alternative. Similarly, there is no 17,507 square-foot Gallery nor a fitness/gym/yoga studio. A total of 1,069 residential units, 93 hotel rooms (rather than 208 rooms under the project), and 80,406 square feet of retail uses, including a 34,705 square-foot grocery store, are included under this alternative. Under the Reduced Density Alternative, a total of 535 apartments and live /work units, and 534 condominiums are provided. Coupled with the square footage within the Reef building, the development density of this alternative is approximately 4.37:1. The development under this Alternative is accommodated in eight new buildings up to 10 stories/121 feet in height, and a single residential tower up to 420 feet in height. Parking is provided in a seven-story above-ground garage on the West Block, and in subterranean parking garages on the East Block. Also, project signage follows the same conceptual framework as the project. However, because of the reduced height of buildings included in this alternative, signage within Vertical Sign Zone 3 is substantially reduced in visibility, except for the high-rise residential tower, which includes the same signage as permitted for the South Tower under the project.

This alternative implements the following Project Objectives to a lesser degree than the project because there is a smaller hotel, fewer housing units, fewer community- and

resident-serving entertainment uses, and less commercial square footage, which generates less annual tax revenue for the City as compared to the project: (i) To provide the amenities necessary for the Magic Box to attract top-notch events to the City of Los Angeles (i.e., smaller Hotel); (ii) To create an urban center that is compatible with and complementary to currently ongoing growth in the resident population of Downtown Los Angeles; (iii) To provide for the development of an underutilized site near public transportation through the replacement of surface parking lots with new housing, retail uses, restaurants, and a hotel to meet anticipated market demands; (iv) To provide an integrated mixed-use project that is economically viable and serves the needs of the community and the region; (v) To support regional mobility goals and local and regional growth policies by encouraging development in and around activity centers, reducing vehicle trips and public infrastructure costs; and, (vi) To generate additional annual tax revenues to the City of Los Angeles, including property taxes, sales taxes, transient occupancy taxes, and gross receipts taxes (i.e., smaller project).

Reference: For a complete discussion of impacts associated with Alternative 4, please see Section VI of the Draft EIR.

5. Alternative 5 – Existing Zoning (Industrial)

Under the Existing Zoning Alternative, the project site is developed with an industrial building at the density permitted by the existing M1-2 zoning. Under this alternative, the Reef building remains in its current location, and is modified similar to the project. In addition, up to 30,000 square feet of existing floor area on the ground floor may be converted to 20,000 square feet of retail space and 10,000 square feet of restaurant space. Under the Existing Zoning Alternative, 1,679,357 square feet of industrial development is provided in a single building located on the East Block. Parking for all uses contained within this Alternative is provided in a single above-ground parking structure located on the West Block. This alternative does not provide, as compared to the project: (i) a 29,355 square-foot grocery store; (ii) a 17,507 square-foot gallery; (iii) a 7,849 fitness/gym/yoga studio; (iv) a 208-room hotel; (v) 895 condominiums; (vi) 528 apartments; and (vii) 21 live/work units.

Impact Summary: The Existing Zoning Alternative avoids the significant and unavoidable impacts of the project with respect to visual quality, light and glare, freeway health risk, cumulative traffic noise, and the project driveway. The Existing Zoning Alternative has the same temporary significant and unavoidable impact as the project with respect to visual quality during construction. The Existing Zoning Alternative has lower significant and unavoidable impacts compared to the project with respect to shade/shadow, air quality and transportation. The Existing Zoning Alternative has lower less-than-significant impacts than the project with respect to public services and utilities (water, wastewater, natural gas), and construction impacts, and higher less-than-significant impacts with respect to utilities (solid waste, electricity).

Findings: The Existing Zoning Alternative avoids the significant and unavoidable impacts of the project with respect to visual quality, light and glare, freeway health risk, cumulative

traffic noise, and the project driveway. The Existing Zoning Alternative has the same temporary significant and unavoidable impact as the project with respect to visual quality during construction. The Existing Zoning Alternative has lower significant and unavoidable impacts compared to the project with respect to shade/shadow, air quality and transportation. The Existing Zoning Alternative has lower less-than-significant impacts than the project with respect to public services and utilities (water, wastewater, natural gas), and construction impacts, and higher less-than-significant impacts with respect to utilities (solid waste, electricity).

In addition, the Existing Zoning Alternative does not implement some of the Project Objectives to the same degree as the project. It is found, pursuant to Public Resources Code section 21081, subsection (a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible the Existing Zoning Alternative described in the Draft EIR.

Rationale for Findings: The Existing Zoning Alternative develop the project site with 1,679,357 square feet of industrial development in a single building located on the East Block. The industrial building is developed at the density permitted by the existing M1-2 zoning. The Reef building remains in its current location, and is modified similar to the project. In addition, up to 30,000 square feet of existing floor area on the ground floor may be converted to 20,000 square feet of retail space and 10,000 square feet of restaurant space. Parking for all uses contained within this alternative is provided in a single above-ground parking structure located on the West Block. This alternative would not provide, as compared to the project: (i) a 29,355 square-foot grocery store; (ii) a 17,507 square-foot gallery; (iii) a 7,849 square-foot fitness/gym/yoga studio; (iv) a 208-room hotel; (v) 895 condominiums; (vi) 528 apartments; and (vii) 21 live/work units.

Operation of the Existing Zoning Alternative also results in ongoing generation of solid waste. Over the long-term, the Existing Zoning Alternative generates approximately 8,743 net ppd of solid waste over existing conditions (see Draft EIR Table VI-34 [Estimated Solid Waste Generation for Existing Zoning Alternative]). As such, this alternative generates approximately 623 ppd more solid waste than the project, resulting in a net generation of 8,120 ppd over existing conditions.

This alternative implements the following Project Objectives to a lesser degree than the project due to the absence of the grocery store, gallery, fitness studio, hotel and housing units: (i) To preserve and promote the Reef as a creative environment that supports the design, rapid prototyping, production, sales, innovation, and exhibition of new products; (ii) To provide a design that emphasizes pedestrian and public transit opportunities, and that integrates linkages between pedestrians, public transit facilities, and the public roadways; (iii) To support regional mobility goals and local and regional growth policies by encouraging development in and around activity centers, reducing vehicle trips and public infrastructure costs; and, (iv) To generate additional annual tax revenues to the City of Los Angeles, including property taxes, sales taxes, transient occupancy taxes, and gross receipts taxes (i.e., smaller project). This Alternative would not implement the

following Project Objectives due to the absence of the grocery store, gallery, fitness studio, hotel and housing units: (i) To construct a complementary, integrated set of land uses and signage that promotes the creation of a vibrant and dynamic 24-hour activity center that would provide the opportunity for people to live, work, and entertain; (ii) To provide the amenities necessary for the Magic Box to attract top-notch events to the City of Los Angeles; (iii) To create an urban center that is compatible with and complementary to currently ongoing growth in the resident population of Downtown Los Angeles; (iv) To provide for the development of an underutilized site near public transportation through the replacement of surface parking lots with new housing, retail uses, restaurants, and a hotel to meet anticipated market demands; and, (v) To provide an integrated mixed-use project that is economically viable and serves the needs of the community and the region.

Reference: For a complete discussion of impacts associated with Alternative 5, please see Section VI of the Draft EIR.

D. Alternatives Rejected as Being Infeasible

In addition to the five alternatives listed above, another alternative was considered and rejected. Specifically, this alternative would consider an alternate site. This alternative was rejected as being infeasible because no other site could accommodate the project (e.g. with an existing commercial building suitable for adaptive reuse, adjoining surface parking lots, and in the vicinity of a transit station) that is owned or under control of the applicant in the City. Accordingly, this alternative was considered but rejected as infeasible.

E. Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. In addition, Section 15126.6(e)(2) of the CEQA Guidelines states that: “If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”

The selection of an environmentally superior alternative is based on an evaluation of the extent to which the alternatives reduce or eliminate the significant impacts associated with the project, and on a comparison of the remaining environmental impacts of each alternative.

Of the alternatives evaluated, the No Project Alternative is considered the overall environmentally superior alternative as it would avoid nearly all of the impacts that would occur under the project. However, although most impacts are avoided under the No Project Alternative, the beneficial aspects of the project, such as the new 1,444 housing units, the new jobs created by the project, the improvement of the project site with distinctive design, architecture and landscaping, and the fulfillment of numerous regional and City plan and policy goals for the area would not occur. Without development of the

project at the project site, the No Project Alternative would not meet any of the Project Objectives.

Among the other alternatives, the Reduced Height/Reduced Signage Alternative is environmentally superior to the project. The Reduced Height/Reduced Signage Alternative reduces building heights to 12 stories/143 feet. Under the Reduced Height/Reduced Signage Alternative, a total of 1,010 apartments and live /work units, and 434 condominiums are provided instead of the 1,444 units in the project. Up to 101,941 square feet of new retail uses, including a 34,705 square-foot grocery store, and a 127-room hotel, rather than a 208-room hotel, are included in Reduced Height/Reduced Signage Alternative. Coupled with the square footage within the Reef building, the development density of this alternative is approximately 5.15:1. The development under this alternative is accommodated in nine new buildings up to 12 stories in height. Parking is provided in a seven-story above-ground garage on the West Block, and in subterranean parking garages on the East Block. Under the Reduced Height/Reduced Signage Alternative, signage on the Reef building is reduced in size by 50% compared to the project, and highly animated signage is not permitted in Vertical Sign Zone 3 on the Reef building.

Because the Reduced Height/Reduced Signage reduces the building heights, signage program and development density, as compared to the project, the Reduced Height/Reduced Signage Alternative avoids the significant and unavoidable impacts of the project with respect to visual quality, light and glare, and cumulative traffic noise. The Reduced Height/Reduced Signage Alternative has the same significant and unavoidable temporary construction visual quality impacts as the project. The Reduced Height/Reduced Signage Alternative has lower, but still significant and unavoidable impacts compared to the project with respect to shade/shadow, air quality, freeway health risk, and transportation. The Reduced Height/Reduced Signage Alternative has lower less-than-significant impacts than the project with respect to public services and utilities.

The Reduced Height/Reduced Signage Alternative implements all but the two following Project Objectives: (i) To provide the amenities necessary for the Magic Box to attract top-notch events to the City of Los Angeles (i.e., smaller Hotel); and (ii) To generate additional annual tax revenues to the City of Los Angeles, including property taxes, sales taxes, transient occupancy taxes, and gross receipts taxes (i.e., smaller project).

XI. OTHER CEQA CONSIDERATIONS

A. Growth Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires a discussion of the ways in which a proposed project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.

The project generates approximately 3,808 employees, which results in a net increase of approximately 1,161 employees on the project site over existing conditions. This increased employee population could patronize local businesses and services in the area, and foster economic growth. The potential concentration of employment in this area of the City under the project is consistent with the regional growth management policies discussed in detail in Section IV.J (Land Use & Planning) of the Draft EIR. These policies promote development activity in existing developed areas, especially ones near existing transit and transportation infrastructure, such as the project site. The project fosters economic growth and revitalizes an underutilized area by adding businesses to the project site. The employees associated with the project could, in turn, patronize existing local businesses and services in the area. Additionally, short-term and long-term employment opportunities are expected to be provided during construction and operation of the project.

The Southeast Los Angeles Community Plan policies also encourage new growth and development in areas with diverse economic and physical needs that do not require extension of other major infrastructure systems. Specifically, the Community Plan encourages the development of projects with mixed-use commercial and residential development. The goal is to provide housing close to jobs, to reduce vehicular trips, to reduce congestion and air pollution, to assure adequate sites for housing, and to stimulate Pedestrian Oriented Districts to enhance the quality of life in the Plan area. Therefore, this projected employment growth is not expected to cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels, and that results in an adverse physical change in the environment; or introduces unplanned infrastructure that was not previously evaluated in the adopted Community Plan. Therefore, projected employment growth associated with the project is less than significant.

The project results in a net increase of 1,161 employees over existing conditions, which could result in induced housing growth on and in the vicinity. The project could include some high-skilled jobs, and those employees may choose to relocate or the project site or nearby in Downtown Los Angeles to be closer to their jobs. The types of jobs, which include office, commercial, and hotel, at the project site could enable employees to have wide range of housing options. However, some of the new employees are likely to be drawn from the local labor force readily available in the Southeast Community Plan Area and surrounding communities. In addition, it is likely that many of the employees associated with uses to be located or relocating to the project site are long-term residents of other nearby communities and are unlikely to relocate. According to the Draft/Proposed Southeast Los Angeles Community Plan, the population in the Southeast Los Angeles Community Plan area is expected to increase by 28,422 persons between 2008 and 2035. The construction of 1,444 additional residential dwelling units on the project site is expected to accommodate between 2,224 and 6,309 new permanent residents in the City. The addition of these new residents is within the Community Plan growth projection, representing between approximately 8 percent and approximately 22 percent of the Community Plan total growth for the period of 2008 to 2035. Since the population growth associated with the project is within the projected growth for the

Southeast Los Angeles Community Plan area, impacts related to population growth are projected to be less than significant.

B. Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines provide an EIR is required to address any significant irreversible environmental changes that would occur should the proposed project be implemented. The types and level of development associated with the project would consume limited, slowly renewable, and non-renewable resources. This consumption would occur during construction of the project and would continue throughout its operational lifetime. The development of the project would require a commitment of resources that would include (1) building materials, (2) fuel and operational materials/resources and (3) the transportation of goods and people to and from the project site.

Construction of the project requires consumption of resources that are not replenishable or that may renew slowly as to be considered non-renewable. These resources include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), petrochemical construction materials (e.g., plastics), and water. Fossil fuels, such as gasoline and oil, are be consumed in the use of construction vehicles and equipment. The consumption of these resources are out through the construction period. The commitment of resources required for the type and level of development would limit the availability of these resources for future generations for other uses during the operation of the project. However, this resource consumption would be consistent with growth and anticipated growth in the Los Angeles area.

Concurrently, the project contributes to a land use pattern that reduces reliance on private automobiles and the consumption of non-renewable resources in a larger context. The project is within walking distance of the Blue Line and includes 1,906 bicycle parking spaces, thereby fostering the use of alternate modes of transit. Further, the project includes design features and be subject to building regulations that reduce demands for energy resources needed to support project operations. For instance, Project Design Features PDF-UT-1, PDF-UT-2, PDF-UT-3, PDF-UT-7 provide measures by which the project conserves water and energy and be built in accordance with LEED standards. In addition, with compliance with existing regulatory measures, the project is required to confirm that the capacity of the local and trunk lines are sufficient to accommodate the project and implement any upgrades to the sewer system serving the project. The project is also expected to comply with the 2013 Title 24 part 6 building code and the City's Green Building Code, and existing measures related to recycling construction and operational waste and the conservation of natural gas.

Continued use of non-renewable resources is expected to be on a relatively small scale and consistent with regional and local growth forecasts in the area, as well as state and local goals for reductions in the consumption of such resources. The project would not affect access to existing resources, nor interfere with the production or delivery of such

resources. The project site contains no energy resources that would be precluded from future use through project implementation. In addition, consumption of resources are justified because the project provides much needed housing, job opportunities to area residents, and open space, retail and restaurant amenities to the community. The project's irreversible changes to the environment related to the consumption of nonrenewable resources would not be significant.

C. CEQA Considerations

1. The City, acting through the Department of City Planning is the "Lead Agency" for the project evaluated the EIR. The City finds that the EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the EIR for the project, that the Draft EIR which was circulated for public review reflected its independent judgment and that the Final EIR reflects the independent judgment of the City.

2. The EIR evaluated the following potential project and cumulative environmental impacts: Aesthetics; Air Quality; Biological Resources; Cultural Resources; Geology and Soils; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Noise; Population, Housing, and Employment; Public Services; Transportation; and Utilities. Additionally, the EIR considered Growth Inducing Impacts and Significant Irreversible Environmental Changes. The significant environmental impacts of the project and the alternatives were identified in the EIR.

3. The City finds that the EIR provides objective information to assist the decisions makers and the public at large in their consideration of the environmental consequences of the project. The public review period provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft EIR. The Final EIR was prepared after the review period and responds to comments made during the public review period.

4. Textual refinements and errata were compiled and presented to the decision makers for review and consideration. The City staff has made every effort to notify the decision makers and the interested public/agencies of each textual change in the various documents associated with project review. These textual refinements arose for a variety of reasons. First, it is inevitable that draft documents would contain errors and would require clarifications and corrections. Second, textual clarifications were necessitated in order to describe refinements suggested as part of the public participation process.

5. The Department of City Planning evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the Department of City Planning prepared written responses describing the disposition of significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned response to the comments. The Department of City Planning reviewed the comments received and responses thereto and has determined that neither the

comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR. The Lead Agency has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the EIR.

6. The Final EIR documents changes to the Draft EIR. The Final EIR provides additional information that was not included in the Draft EIR. Having reviewed the information contained in the Draft EIR and the Final EIR and in the administrative record, as well as the requirements of CEQA and the CEQA Guidelines regarding recirculation of Draft EIRs, the City finds that there is no new significant impacts, substantial increase in the severity of a previously disclosed impact, significant information in the record of proceedings or other criteria under CEQA that would require recirculation of the Draft EIR, or preparation of a supplemental or subsequent EIR.

Specifically, the City finds that:

a. The Responses To Comments contained in the Final EIR fully considered and responded to comments claiming that the project would have significant impacts or more severe impacts not disclosed in the Draft EIR and include substantial evidence that none of these comments provided substantial evidence that the project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR.

b. The City has thoroughly reviewed the public comments received regarding the project and the Final EIR as it relates to the project to determine whether under the requirements of CEQA, any of the public comments provide substantial evidence that would require recirculation of the EIR prior to its adoption and has determined that recirculation of the EIR is not required.

c. None of the information submitted after publication of the Final EIR, including testimony at the public hearings on the project, constitutes significant new information or otherwise requires preparation of a supplemental or subsequent EIR. The City does not find this information and testimony to be credible evidence of a significant impact, a substantial increase in the severity of an impact disclosed in the Final EIR, or a feasible mitigation measure or alternative not included in the Final EIR.

7. The mitigation measures identified for the project were included in the Draft and Final EIRs. As revised, the final mitigation measures for the project are described in the Mitigation Monitoring Program (MMP). Each of the mitigation measures identified in the MMP is incorporated into the project. The City finds that the impacts of the project have been mitigated to the extent feasible by the mitigation measures identified in the MMP.

8. CEQA requires the Lead Agency approving a project to adopt a MMP or the changes to the project which it has adopted or made a condition of project approval in order to

ensure compliance with the mitigation measures during project implementation. The mitigation measures included in the EIR as certified by the City as adopted by the City serves that function. The MMP includes all of the mitigation measures and project design features adopted by the City in connection with the approval of the project and has been designed to ensure compliance with such measures during implementation of the project. In accordance with CEQA, the MMP provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of Public Resources Code Section 21081.6, the City hereby adopts the MMP.

9. In accordance with the requirements of Public Resources Section 21081.6, the City hereby adopts each of the mitigation measures expressly set forth herein as conditions of approval for the project.

10. The custodian of the documents or other material which constitute the record of proceedings upon which the City's decision is based is the City Department of City Planning.

11. The City finds and declares that substantial evidence for each and every finding made herein is contained in the EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.

12. The City is certifying an EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the EIR as comprising the project.

13. The EIR is a Project EIR for purposes of environmental analysis of the project. A Project EIR examines the environmental effects of a specific project. The EIR serves as the primary environmental compliance document for entitlement decisions regarding the project by the City and other regulatory jurisdictions.

14. The City finds that the Design Guidelines and Equivalency Program which is part of the project were fully disclosed and analyzed in the EIR and that this program for potential future changes to the project will occur, if requested, only after subsequent environmental review pursuant to CEQA through the Site Plan Review process.

15. The City finds that none of the public comments to the Draft EIR or subsequent public comments or other evidence in the record, including the changes in the project in response to input from the community and the Council Office, include or constitute substantial evidence that would require recirculation of the Final EIR prior to its certification and that there is no substantial evidence elsewhere in the record of proceedings that would require substantial revision of the Final EIR prior to its certification, and that the Final EIR need not be recirculated prior to its certification.

XII. STATEMENT OF OVERRIDING CONSIDERATIONS

The Final EIR identified the following unavoidable significant impacts: 1) Aesthetics – Sign Vertical Zone 3 animated signage; lighting associated with the total level of signage on

the Reef building; visual impacts during construction; shade/shadow impacts on the Rutland Apartments; 2) Air Quality – construction VOC emissions; construction and operations VOC emissions; operation NO_x emissions, and freeway adjacent health risks; 3) Noise –cumulative traffic noise on 17th Street west of Hill Street; and 4) Transportation/Circulation – cumulative construction traffic and operational traffic at two intersections in the AM peak hour, nine intersections at PM peak hour, 10 intersections at the Friday PM peak hour, and one intersection at the Saturday Midday peak hour. Section 21081 of the California Public Resources Code and Section 15093(b) of the CEQA Guidelines provide that when the decisions of the public agency allows the occurrence of significant impacts identified in the Final EIR that are not substantially lessened or avoided, the lead agency must state in writing the reasons to support its action based on the Final EIR and/or other information in the record. Article I of the City's CEQA Guidelines incorporates all of the State CEQA Guidelines contained in Title 15, California Code of Regulations, Sections 15000 et seq. and thereby requires, pursuant to Section 15093 (b) of the CEQA Guidelines, that the decision maker adopt a Statement of Overriding Considerations at the time of approval of a Project if it finds that significant adverse environmental effects identified in the Final EIR cannot be substantially lessened or avoided. These findings and the Statement of Overriding Considerations are based on substantial evidence in the record, including but not limited to the Final EIR, the source references in the Final EIR, and other documents and material that constitute the record of proceedings.

Accordingly, the City adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts will result from implementation of the project. Having (i) adopted all feasible mitigation measures, (ii) rejected as infeasible alternatives to the project, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the project against the project's significant and unavoidable impacts, the City hereby finds that the each of the project's benefits, as listed below, outweighs and overrides the significant unavoidable impacts of the project.

Summarized below are the benefits, goals and objectives of the project. These provide the rationale for approval of the proposed project. Any one of the overriding considerations of economic, social, aesthetic and environmental benefits individually would be sufficient to outweigh the significant unavoidable impacts of the project and justify the approval, adoption or issuance of all of the required permits, approvals and other entitlements for the project and the certification of the completed Final EIR. Despite the unavoidable aesthetics, air quality, noise, and transportation/circulation impacts caused by the construction and operation of the project, the City approves the project based on the following contributions of the project to the community:

1) The project will introduce a new mixed-use center, the first of its kind in the Southeast Los Angeles Community Plan area, with the provision of much-needed 1,444 new housing units, 67,702 square feet of new retail and restaurant space, a 29,355 square-foot grocery store, and a 208-key hotel to serve the project and area residents, employees and visitors.
2) The project improves existing conditions by replacing surface parking lots with

the provision of publicly accessible mid-block paseos on the project's West Block (the Exchange) and East Block (the Strand), with a terrace, café, outdoor seating, a performance space and landscaping, thereby enhancing the pedestrian experience within and around the project site.

3) The project introduces a new cultural amenity to the area in the form of a 17,507 square-foot public gallery designed to host local, national, and international exhibitions and expositions.
4) The project contributes to the City's economic base through the development of currently underutilized property, generating approximately $2.07 million in construction revenues to the City and approximately $5.58 million in recurring City General Fund revenues.
5) The project will nearly double the number of jobs at the project site by generating a net increase of 1,161 employees, including, but not limited to, 174 hotel employees, 80 grocery store employees and 163 employees for the retail uses.
6) The project will help facilitate small business and local entrepreneurship at the project site by providing new ground-level micro-retail shop spaces at the intersection of Hill Street and 21st Street.
7) Reinforce the City's commitment to facilitating a reduction in traffic impacts by locating employment-generating land uses and much-needed new residences in an area well served by public transportation, including, but no limited to, the Metro Blue Line and Expo Line, LADOT DASH bus and Metro Local buses, thereby reducing vehicles miles traveled and shortening commute times.
8) The project further supports multimodal transit by providing 1,906 bicycle parking spaces that will be serviced by a bicycle hub with bicycle lockers, bicycle repair shop and showers.
9) The project incorporates various Green Building/Sustainability Measures and features to enhance air quality and support Los Angeles' sustainability goals and polices. The project is designed to meet the Leadership in Energy and Environmental Design (LEED) Green Building Rating System Silver standard to reduce energy consumption.
10) The project activates the streets along the project by creating a pedestrian-friendly environment through sidewalk widening and infrastructural improvements, and locating ground level commercial and retail activities that enhance pedestrian access from Washington Boulevard into and through the project site.
11) The project preserves and promotes the Reef as a creative environment that supports the design, rapid prototyping, production, sales, innovation, and exhibition of new products by potentially converting 180,000 square feet into creative office space, thereby fostering existing economic endeavors in the community.

Finding: For all the aforementioned reasons, the City finds that the benefits of the project, as approved, outweigh and override the significant and unavoidable impacts identified above.

FINDINGS OF FACT (SUBDIVISION MAP ACT)

In connection with the approval of Vesting Tentative Tract Map No. 72914 the Advisory Agency of the City of Los Angeles, pursuant to Sections 66473.1, 66474.60, .61 and .63 of the State of California Government Code (the Subdivision Map Act), makes the prescribed findings as follows:

(a) THE PROPOSED MAP WILL BE/IS CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

The project site is located within the adopted Southeast Los Angeles Community Plan area and is designated with a Limited Manufacturing land use with the corresponding CM, MR1and M1 Zones. Four acres of the West Lot are zoned [Q]M1-2-O and the remainder of the West Lot and all of the East Lot are zoned M1-2-O. The project site is within the South Los Angeles Alcohol Sales Specific Plan area. It is also located within the adopted Council District 9 Redevelopment Project Area, the Central City Parking Area, the Downtown Housing Incentive Area, the Central City Revitalization Zone, and the Los Angeles State Enterprise Zone. The project site contains approximately 9.7 acres. The proposed General Plan designation will be consistent with the proposed zone upon approval of Case No. CPC-2014-1771-GPA-VZC-SN-VCU-MCUP-CUX-ZV-SPR-MSC.

The project is not subject to the Specific Plan for the Management of Flood Hazards, floodways, floodplains, mud prone areas, coastal high-hazard and flood-related erosion hazard areas, or any other specific plan.

The project includes the construction of a mixed-use development consisting of: 1,444 residential condominiums; 950 commercial condominiums; a 208-key hotel; 67,702 square feet of retail/restaurant uses; a 29,355 square-foot grocery store; a 17,507 square-foot gallery; and a 7,879 square-foot fitness studio. The existing 861,162 square-foot, 12-story Reef Building will be maintained and will include an approximately 8,000 square-foot addition to the rooftop consisting of a restaurant and outdoor space. To accommodate the ongoing evolution of the Reef to support design, prototyping and development of new products in a collaborative atmosphere, up to 180,000 square feet of the space that is currently used for wholesale/showroom operations within the building may be reconfigured into creative office space. The development includes several buildings ranging in height from 88 feet up to 420 feet. The project also includes 2,512 parking spaces and 1,906 bicycle parking spaces.

The Subdivision Map Act requires the Advisory Agency to find the proposed map be consistent with the General Plan. The Southeast Los Angeles Community Plan, a part of the Land Use Element of the City’s General Plan, states the following objectives that are relevant to the project:

Objective No. 1-2: To locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities.

Objective No. 2-3: To attract uses which strengthen the economic base and expand market opportunities for existing and new businesses.

Objective No. 2-4: To enhance the identity of distinctive commercial districts and to identify Pedestrian Oriented Districts (PODs).

Objective No. 2-5: To enhance the appearance of commercial districts.

Objective No. 2-6: To maintain and increase the commercial employment base for community residents whenever possible.

Objective No. 5-1: To preserve existing open space resources and, where possible develop new open space.

The project site and the surrounding area are south of the Downtown area, which is undergoing significant transition. Many new developments, including transit-oriented housing projects, are either built, under construction or proposed. This project will help achieve Objective No. 1-2 above by locating new housing in a way which reduces vehicular trips by creating a lively, pedestrian-oriented development with 1,444 residential condominiums. In addition, according to the City's Housing Element 2013-2021, "[i]t is the overall housing vision of the City of Los Angeles to create for all residents a city of livable and sustainable neighborhoods with a range of housing types, sizes and costs in proximity to jobs, amenities and services." The project achieves this vision by providing needed housing along several transit lines, including the Metro Blue Line Grand/Los Angeles Trade-Technical College Station, the Metro Expo Line 23rd Street Station and Metro Local Service Lines 35, 38, 40, 45, 48 and Metro Rapid Service Line. This type of development is also consistent with the City's Framework Element which states that anticipated growth should be directed toward high density, mixed use centers and to the neighborhoods around its 80 rail stations. Finally, the project also fulfills Objective No. 1-2 through accessibility to numerous services and facilities including the Staples Center, the L.A. Live entertainment complex, USC, and other major employment centers, services and facilities in Downtown Los Angeles.

The project helps achieve Objective No. 2-3 above by resulting in the construction of 67,702 square feet of retail/restaurant uses, a 208-key hotel, a 17,507-square-foot public gallery, and an 7,879-square foot fitness gym/yoga studio. The project also includes a 29,355 square-foot grocery store. In addition, the Project would retain the existing uses within the Reef building and add an approximately 8,000 square-foot restaurant at the rooftop. Plus, up to 180,000 square feet of the Reef building currently used for wholesale/showroom operations may be reconfigured into creative office space, as described above. These uses help strengthen the economic base and expand market opportunities for existing and new businesses

in the Southeast Los Angeles Community Plan Area.

The project is also consistent with Objective Nos. 2-4 and 2-5 above by providing an array of commercial uses in a cohesive, pedestrian-friendly development. The project creates an urban center surrounding large two large open spaces for pedestrians to gather: the “Strand” and the “Exchange.” The commercial components of the project draw upon the existing businesses related to the Reef and also attract new commerce through the potential conversion of the Reef spaces into creative office space. In addition, the project creates a commercial hub by introducing a hotel use for the use of local residents as well as tourists and visitors. The grocery store, retail uses, fitness studio and restaurant, in conjunction with 1,444 residential condominiums, help to achieve Objective No. 2-4 that recommends the enhancement of distinctive commercial districts and Pedestrian Oriented Districts. The project enhances the appearance of the commercial district by replacing a surface parking lot with a contemporary architectural design that includes buildings of various heights, colors, materials and massing, and also creates courtyards and pedestrian pathways. The project also provides community-serving retail and restaurant uses at the ground level to enhance the appearance and quality of the commercial district.

In order to achieve Objective No. 2-6, the project will maintain the existing commercial employment base for community residents by retaining the existing commercial operations in the Reef building and adding an approximately 8,000 square-foot restaurant and additional outdoor space to it for events. In addition, up to 180,000 square feet of the Reef building’s space currently used for wholesale/showroom operations may be reconfigured into creative office space. The project also includes new commercial space to expand the community’s commercial employment base. Specifically, the project replaces a surface parking lot with 1,680,306 square feet of residential, hotel, retail/restaurant, grocery store, gallery and fitness center uses. Therefore, the project would maintain and increase the commercial employment base for community residents.

Finally, the project also achieves Objective No. 5-1 by developing new open space within the project site. The project includes landscaped courtyards and pathways and other open space features that connect the various proposed uses. In total, the project includes approximately 162,255 square feet of open space, of which 85 percent is common open space. Specifically, the project includes a public mid-block paseo that provides full pedestrian access through the project site from Hill Street to Main Street, along with café and outdoor seating, event space, and a seating island within two public courtyards.

In addition to achieving the objectives of the Southeast Los Angeles Community Plan, the current project also supports and is consistent with the following objectives identified in section 105 of the Council District 9 Redevelopment Plan:

Objective No. 1: Job retention and generation by supporting existing employers and attracting new employers.

Objective No. 2: Business expansion and creation of new businesses through public and private funding and business development activities.

Objective No. 4: Consumer retail, shopping and entertainment outlets in the community as a result of funding and suitable commercial development sites.

Objective No. 11: Marketing and promotion of the area's attributes and desirability.

The project achieves Objectives Nos. 1, 2 and 4 above because it retains, expands and potentially reconfigures some of the commercial uses in the Reef building for new creative office space. This creative office space could result in the creation of new businesses to support design, prototyping and development of new products at the Reef. In addition, the project is expected to attract new employers through the creation of 67,702 square feet of retail/restaurant uses including a 29,355 square-foot grocery store, and a 208-key hotel. Therefore, the development of the project assures that the existing jobs are retained and also helps facilitate the creation of new jobs. Finally, the project adds consumer retail, shopping and entertainment outlets in the community. Specifically, the project includes a grocery store, a gallery, a hotel, a fitness studios and restaurants and bars. The project site is suited for commercial development due to its proximity to Downtown Los Angeles and location near numerous transit lines.

The project also accomplishes Objectives No. 11 above by promoting the area's attributes and desirability, namely its proximity to the services and facilities in Downtown Los Angeles and its location near many public transit lines. For example, the Metro Blue Line runs along Washington Boulevard at the northern edge of the property, with a stop less than one-quarter of a mile away, and Metro Local Service Lines 40 and 45 and Metro Rapid Service Line 745 are located on Broadway.

Finally, the project shall comply with Section 2 of the South Central Alcohol Sales Specific Plan, which states that "no person shall establish in the Area an establishment dispensing…alcoholic beverages…without first obtaining conditional use approval." The project applicant is seeking approval of a Master Conditional Use permit for the sale of alcoholic beverages in connection with the project's restaurants, event venues and the retail establishments. In addition, the request will allow the full-service grocery store to offer a full line of alcoholic beverages for purchase and consumption off the premises. The project's dining establishments are anticipated to attract visitors and neighbors and to provide on-

site dining options to local residents. None of the specific operators of the establishments are known at this time. However, each operator will be required to obtain an Approval of Plans from the City authorizing the sale of alcoholic beverages at an establishment within the project. The sale of alcoholic beverages will be incidental to the market and restaurant uses. Accordingly, alcoholic beverages shall be sold in conformance with Section 2 of the South Central Alcohol Sales Specific Plan.

Therefore, as conditioned, the proposed vesting tract map is consistent with the intent and purpose of the applicable General, the Southeast Community Plan, the Council District 9 Redevelopment Plan and the South Central Alcohol Sales Specific Plan.

(b) THE DESIGN AND IMPROVEMENT OF THE PROPOSED SUBDIVISION ARE CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

21st Street, adjoining the subject property to the south, is designated a Local Street – Standard in the Mobility Plan 2035, dedicated to a 60-foot width. Main Street, adjoining the subject property to the east, is designated an Avenue I in the Mobility Plan 2035, dedicated to a 100-foot width. Hill Street, adjoining the subject property to the west, is a designated an Avenue II in the Mobility Plan 2035, dedicated to an 86-foot width. Washington Boulevard, adjoining the subject property to the north, is designated a Boulevard II in the Mobility Plan 2035, dedicated to a 110-foot width. Broadway, bisecting the project site, is designated an Avenue II in the Mobility Plan 2035, dedicated to an 86-foot width. The project therefore involves the construction of an additional concrete sidewalk on Washington Boulevard to complete a full-width concrete sidewalk with tree wells. In addition, the project improves all the corner cuts by placing additional concrete for sidewalk area purposes. The project also results in the closure of a total of 20 existing driveways/curb cuts on Washington Boulevard, 21st Street, Hill Street, Broadway and Main Street and the creation of nine new driveways located at approximately mid-block locations or at a sufficient distance from adjacent intersections to not interfere with driver and pedestrian visibility and safety in accordance with LADOT standards and approvals. Overall, the project provides infrastructure improvements including a minimum of 289 new on-site trees, pedestrian amenities, including minimum 15-foot sidewalks along Washington Boulevard (east of Broadway), Broadway, and Main Street, and minimum 20-foot wide sidewalks on Hill Street, Washington Boulevard (west of Broadway) and Broadway adjacent to the Reef building. Both sides of Broadway through the project site are designed to provide for an enhanced pedestrian experience.

The project provides a total of 2,512 parking spaces within two parking structures: an aboveground, eight-level parking structure on the West Lot and a subterranean, four-level structure on the East Lot. With approval of a parking reduction request, the project is in conformance LAMC parking requirements. The parking structures are physically integrated within the project site. The various parking areas would

be accessed via four driveways, including one off of Main Street and three off of Broadway, 21st Street, and Hill Street. In each case, the vehicular entry into the garage would be as small and efficient as possible. The project also provides 1,906 short- and long-term bicycle parking spaces to be located throughout the project site.

Therefore, as conditioned, design and improvement of the project are consistent with the applicable General Plan.

(c) THE SITE IS PHYSICALLY SUITABLE FOR THE PROPOSED TYPE OF DEVELOPMENT.

The approximately 4.9-acre West Lot is currently developed with the approximately 861,162 square-foot, 12-story Reef building and approximately 400 surface parking spaces. The approximately 4.7-acre East Lot is currently developed with an approximately 11,150 square feet warehouse/distribution building and approximately 700 surface parking spaces.

The project consists of retention of the Reef building, demolition of the warehouse/distribution building and surface parking lots, and new construction. The Reef building is being retained and will include an approximately 8,000 square-foot addition to the rooftop consisting of a restaurant and outdoor space. In addition, up to 180,000 square feet of the space that is currently used for wholesale/showroom operations within the Reef building may be reconfigured into creative office space. New construction would create a mixed-use development consisting of: 1,444 residential condominiums; 950 commercial condominiums; a 208-key hotel; 67,702 square feet of retail/restaurant uses; a 29,355 square-foot grocery store; a 17,507 square-foot gallery; and a 7,879 square-foot fitness studio. The development will include several buildings ranging in height from 88 feet up to 420 feet.

The project site is relatively flat and located within an urbanized area and is not located in a slope stability study area, high erosion hazard area or a fault/rupture study zone.

The tract has been approved contingent upon the satisfaction of the Department of Building and Safety, Grading Division prior to the recordation of the map and issuance of any permits.

(d) THE SITE IS PHYSICALLY SUITABLE FOR THE PROPOSED DENSITY OF DEVELOPMENT.

Adjacent land uses surrounding the project site are a mix of commercial, institutional, and residential uses. The properties located directly north of the subject property, along the north side of Washington Boulevard, are within the M2-2-O Zone and developed with a mixed-use Rutland apartment building with

ground-floor retail, a furniture store, retail shops, and an office space building with ground-floor retail. The properties located east of the subject property, along the east side of Main Street, are within the M1-2-O Zone and developed with various office and commercial uses, including the LA Sports Museum and Panamericana Travel & Tours, and associated parking. The properties located directly south of the subject property, along the south side of 21st Street, is within the M1-2-O Zone and developed with a mixture of office buildings and warehouses with associated parking. The property located to the west of the subject property, along the west side of Hill Street, is within the PF-1 Zone and developed with the Los Angeles Municipal Juvenile court house, a motor vehicle inspection garage, and associated parking. The project site's current land use designation is Limited Manufacturing within the [Q]M1-2-O and M1-2-O Zones. With the proposed General Plan Amendment and Vesting Zone Change, the project will have a Community Commercial land use designation and be within the (T)(Q)C2-2-O-SN Zone.

The project introduces new residential and commercial uses on underutilized lots that mostly consist of surface parking. The project consists of: 1,444 residential condominiums and a 208-key hotel. While the introduction of these uses is new to the project site, the project vicinity is highly urbanized, features high intensity development, and contains precedents for mixed-use development. For example, the project site's density is suitable because it is compatible with the high density campuses of Los Angeles Trade Technical College and the Santee Education Complex. The project is also compatible with the area northwest of the project site in the South Park neighborhood of Downtown Los Angeles, which features new and planned mixed-use housing/retail and office developments similar to the density of the proposed project. Finally, the project site's mixed-use character is compatible with the Rutland apartment building directly north of the project site, which features ground-floor retail with housing.

Regarding compatibility with the existing commercial uses in the area, the project's retention of the existing Reef building ensures that the project would be suitable with existing office buildings in the area such as the creative office space at 155 West Washington Boulevard building directly north of the project site. The project would include 950 commercial condominiums; 67,702 square feet of retail/restaurant uses; a 29,355 square-foot grocery store; a 17,507 square-foot gallery; and a 7,879 square-foot fitness studio. The project site's proposed density is also suitable with the area south of the project site, which contains a high-density of industrial buildings and warehouses. The project provides a total of 2,512 parking spaces within two parking structures: an aboveground, eight-level parking structure on the West Lot and a subterranean, four-level structure on the East Lot. The parking structures are physically integrated within the project site, thereby ensuring compatibility with uses in the area.

The project, as conditioned and with approval of the requested General Plan Amendment to change the land use designation to Community Commercial and Vesting Zone Change to (T)(Q)C2-2-O-SN, complies with all LAMC requirements

for parking, yards and open space. Therefore, as conditioned, the proposed vesting tract map is physically suitable for the proposed density of the development.

(e) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SUBSTANTIAL ENVIRONMENTAL DAMAGE OR SUBSTANTIALLY AND AVOIDABLY INJURE FISH OR WILDLIFE OR THEIR HABITAT.

The EIR prepared for the project identifies no potential adverse impacts on fish or wildlife resources. The project site, as well as the surrounding area are presently developed with residential, office, industrial and commercial structures and do not provide a natural habitat for either fish or wildlife. The project site is presently improved with the Reef building, a warehouse/distribution building and surface parking lots and does not contain any natural open spaces, act as a wildlife corridor, contain riparian habitat, wetland habitat, migratory corridors, conflict with any protected tree ordinance, conflict with a Habitat Conservation Plan, nor possess any areas of significant biological resource value. Therefore, the design of the subdivision would not cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.

(f) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SERIOUS PUBLIC HEALTH PROBLEMS.

There appear to be no potential public health problems caused by the design or improvement of the proposed subdivision.

The development is required to be connected to the City's sanitary sewer system, where the sewage will be directed to the Hyperion Treatment Plant, which has been upgraded to meet Statewide ocean discharge standards. The Bureau of Engineering has reported that the proposed subdivision does not violate the existing California Water Code because the subdivision will be connected to the public sewer system and will have only a minor incremental impact on the quality of the effluent from the Hyperion Treatment Plant.

(g) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS WILL NOT CONFLICT WITH EASEMENTS ACQUIRED BY THE PUBLIC AT LARGE FOR ACCESS THROUGH OR USE OF PROPERTY WITHIN THE PROPOSED SUBDIVISION.

The proposed subdivision includes a proposed below grade encroachment within the boundaries of the vesting tentative map. The Bureau of Engineering includes a special condition in its comment letter dated January 2, 2016 that no portions of proposed airspace lots shall encroach below the grade except the limited cut corner dedications. The applicant is therefore required to satisfy this condition. As stated in its comment letter dated December 26, 2014, the Bureau of Sanitation

reviewed the proposed subdivision and found no potential conflicts with easements. As designed and conditioned, the proposed subdivision does not conflict with the easement requirements.

(h) THE DESIGN OF THE PROPOSED SUBDIVISION WILL PROVIDE, TO THE EXTENT FEASIBLE, FOR FUTURE PASSIVE OR NATURAL HEATING OR COOLING OPPORTUNITIES IN THE SUBDIVISION. (REF. SECTION 66473.1)

In assessing the feasibility of passive or natural heating or cooling opportunities in the proposed subdivision design, the applicant has prepared and submitted materials which consider the local climate, contours, configuration of the parcels to be subdivided and other design and improvement requirements.

Providing for passive or natural heating or cooling opportunities will not result in reducing allowable densities or the percentage of a lot which may be occupied by a building or structure under applicable planning and zoning in effect at the time the tentative map was filed.

The topography of the site has been considered in the maximization of passive or natural heating and cooling opportunities.

In addition, prior to obtaining a building permit, the subdivider shall consider building construction techniques, such as overhanging eaves, location of windows, insulation, exhaust fans; planting of trees for shade purposes and the height of the buildings on the site in relation to adjacent development.

These findings shall apply to both the tentative and final maps for Vesting Tentative Tract Map No. 72914.