FINDINGS

A. GENERAL PLAN / CHARTER FINDINGS.

The proposed Project and sign district is in substantial conformance with the purposes, intent, and provisions of the General Plan. In addition, the proposed Project and sign district ordinance is consistent with and implement policies in the Central City Community Plan, a component of the Land Use Element of the General Plan:

1. **Framework Element.** The General Plan Framework sets forth a citywide comprehensive long-range growth strategy and defines citywide policies regarding such issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services. The Framework's Long-Range Diagram identifies the Project Site as located within the Downtown Center, an international center for finance and trade, the largest government center in the region, and the location for major cultural and entertainment facilities, hotels, professional offices, corporate headquarters, financial institutions, high-rise residential towers, regional transportation, and Convention Center facilities. The Downtown Center is generally characterized by floor area ratios up to 13:1 and high-rise buildings.

   The Fig+Pico Conference Center Hotels project involves a two-tower development encompassing three hotel brands, with up to a total of 1,153 guest rooms and 13,145 square feet of ground-floor retail/restaurant uses. The Hotel A/B Tower would include up to 775 hotel guest rooms, 11,000 square feet of ground-floor retail/restaurant uses, and podium parking with 330 total spaces for all three hotels within a 38-story, 465-foot tower on the northeast corner of S. Figueroa Street and W. Pico Boulevard. Hotel amenities would include ground-level (Hotel B) and sky lobbies (Hotel A) with ancillary food and beverage, and rooftop pool decks and outdoor amenity areas on the 8th, 9th, 35th, and 37th floors. The tower would also include approximately 9,490 square feet of conference and meeting room spaces on the 9th and 10th floors. Indoor and outdoor amenity areas would be partially shared between the three hotels. The tower would have architectural lighting, on-site and off-site signage, and integrated landscaping. The Hotel C Tower would include up to 378 guest rooms and 2,145 square feet of ground-floor retail/restaurant uses in a 27-story, 350-foot tower located on the northwest corner of W. Pico Boulevard and S. Flower Street. The tower would also include guest amenities such as a ground-level lobby with ancillary food and beverage and a landscaped rooftop pool deck on the 24th floor. The tower would also include architectural lighting, and on-site and off-site signage.

   In addition to the development of the hotel project, a City-initiated Sign District is proposed for the project site and on surrounding parcels adjacent to the Convention Center and the Metro Station. The Sign District is intended to create a unified signage theme and promote the unique entertainment and transit-oriented character of the corridor. The proposed standards of the Sign District provide flexibility in design for ground-mounted and wall-mounted signage, set illumination standards, allow for integrated large-scale architectural lighting, relax restrictions on off-site signage promoting Convention Center and Metro facilities, and permit the installation of supergraphic signage and digital displays in tandem with reducing signage blight within the larger neighborhood context.

   The Project and Sign District would be consistent with the uses, floor area, density, and development type envisioned by the General Plan Framework.

The project site is currently underutilized with surface parking and a two-story commercial building, with an FAR of 0.5. The proposed project would be an in-fill development resulting in an FAR of 9.5:1 and comprised of a balanced mix of retail, restaurant, and hotel uses, with associated identifying and wayfinding signage to be permitted in the vicinity. The project would intensify the use on the site, providing a mix of tourism and employment to the area, supporting the objectives of the Framework Element.

The project is consistent with and advances the following objectives and policies of the General Plan Framework:

Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.

Policy 3.4.1: Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.

Objective 3.10: Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.

Objective 3.15: Focus mixed commercial/residential uses, neighborhood-oriented retail, employment opportunities, and civic and quasi-public uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.

Policy 3.15.3: Increase the density generally within one quarter mile of transit stations, determining appropriate locations based on consideration of the surrounding land use characteristics to improve their viability as new transit routes and stations are funded in accordance with Policy.

Objective 3.16: Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.

The project will support Objectives 3.4 and 3.15 and Policies 3.4.1 and 3.15.3 by providing a high-density mixed-use hotel and commercial development within the City's urban core, with a focus on pedestrian amenities and in closer proximity to transit opportunities. The project will achieve Objective 3.10 through the addition of commercial space that will strengthen the economic base and opportunities for new businesses, by providing significant employment opportunities for the community. The Project's hotel and commercial uses will also support tourism and the regional entertainment and convention center functions of the district. In addition, the Project accommodates Objective 3.16 through its pedestrian-oriented design and streetscape improvements, which include wide sidewalks, street trees, and pedestrian lighting.

2. **General Plan Land Use Designation.** The subject property is located within the Central City Community Plan, updated and adopted by the City Council on January 8, 2003. The Community Plan Map designates the western portion of the property for Regional

Commercial land uses and allows for corresponding zones of CR, C1.5, C2, C4, C5, R3, R4, R5, RAS3, and RAS4, and R5. The Regional Commercial land use is also subject to Footnote No. 3 of the Community Plan Map, which corresponds to Height Districts 3-D and 4-D, with a D limitation of 6:1 FAR, except for transfer of floor area up to 10:1 or 13:1, respectively.

The Community Plan Map also identifies the eastern portion of the property for High Density Residential land uses and allows for a corresponding zone of R5. The High Density Residential portion of the site is subject to Footnote No. 10 of the Community Plan, which states that the Plan contemplated that certain commercial uses may be allowed under the High Density Residential land use, that these uses should be controlled by appropriate Q conditions, and that commercial uses should be located at the street level. This policy is currently implemented through [Q] conditions applicable to the site, which specifically allow for hotel, accessory parking structure, and some C4 uses.

The Project includes a request for a General Plan Amendment to the Regional Commercial designation along the eastern portion of the site, a Zone Change to the C2-4D-O-SN zone over the entire site, inherent modifications to Footnote 3 of the Community Plan and the D-limitations of the zone to accommodate the zoning and a 10:1 by-right FAR, as well as the establishment of a Sign District (-SN) for properties generally located along Figueroa Street, Pico Boulevard, and Flower Street. These requests, acting in concert, would result in land use and zoning consistency, and are in substantial conformance with the purposes, intent and provisions of the General Plan as reflected in the adopted Community Plan.

3. **General Plan Text.** The Central City Community Plan, a part of the Land Use Element of the City's General Plan, states the following objectives and policies that are relevant to the project:

   Objective 2-3: To promote land uses in Central City that will address the needs of all the visitors to Downtown for business, conventions, trade shows, and tourism.

   Policy 2-3.1: Support the development of a hotel and entertainment district surrounding the Convention Center/Staples Arena with linkages to other areas of Central City and the Figueroa corridor.

   Objective 2-4: To encourage a mix of uses which create an active, 24-hour downtown environment for current residents and which would also foster increased tourism.

   The project and Sign District substantially conform with the purpose, intent and provisions of the Community Plan. The project complies with Objectives 2-3 and Policy 2-3.1 as it will convert an underutilized site into a transit-oriented mixed-use commercial development that will provide much needed hotel rooms that will serve the adjacent Convention Center, Staples Center, and other surrounding entertainment uses. The addition of these guestrooms will address the needs of visitors to Downtown for business, conventions, trade shows, and tourism. The project and Sign District will incorporate an activated ground-floor building design, vibrant signage, sidewalk treatments, and landscaping throughout the project site and perimeter that will encourage pedestrian street activity to help achieve Policy 2-3.1. In addition, the project's 15-foot to 23-foot wide sidewalks along Figueroa Street, Flower Street, and Pico Boulevard prioritize pedestrian activity and create a critical linkage along the Figueroa corridor and adjacent to Metro's Pico Station. The Sign District's unified signage theme and the project's hotel and commercial uses, which include ground floor retail and restaurant uses and will feature rooftop bars and amenity decks, will create a vibrant 24-hour downtown environment that will serve the residents and employees of the South Park area, as well as tourism to achieve Objective 2-4.

Downtown Design Guide

The Project and Sign District are also within the boundaries of the Downtown Design Guide (the "Design Guide") in the South Park District, part of the Central City Community Plan. The Design Guidelines contain standards and guidelines for sustainable design, sidewalks and setbacks, ground floor treatment, parking and access, massing and street walls, on-site open space, architectural detail, streetscape improvements and signage. The Project is consistent with the Design Guidelines as it provides: active commercial uses, generous sidewalk widths, and landscape elements that encourage pedestrian activity and provide key linkages within the South Park District; screened parking; private and public open space amenities on the podium decks and hotel rooftops; compatible architectural design; and a comprehensive signage program. In addition, a condition of approval has been included to ensure that the project's roof design is revised to be consistent with the Design Guide.

Redevelopment Plan

In addition, the project site and Sign District are located within the South Park subarea of the City Center Redevelopment Project Area. The Redevelopment Plan for the project area was adopted on May 15, 2002, with an end date of May 15, 2032. The City Center Redevelopment Plan contains numerous objectives, including: developing and revitalizing downtown as a major center of the metropolitan region; preparing the Central City to accept regional growth and development; promoting the development of a full range of uses and employment opportunities; and emphasizing green spaces and public amenities. The Plan does not further restrict land use or add any building limitations which would be applicable to the proposed development. In addition, the land use designations and regulations for any property in the Redevelopment Plan Area defer to and are superseded by the applicable City General Plan, Community Plan and Zoning Ordinance, meaning that any adopted General Plan Amendment, Zone Change, and Sign District affecting properties within the Plan would be reflected in the Redevelopment Plan.

The project and Sign District also support and are consistent with the following objectives of the City Center Redevelopment Plan:

Objective 2. To further the development of Downtown as the major center of the Los Angeles metropolitan region, within the context of the Los Angeles General Plan as envisioned by the General Plan Framework, Concept Plan, City-wide Plan portions, the Central City Community Plan, and the Downtown Strategic Plan.

Objective 3. To create an environment that will prepare, and allow, the Central City to accept that share of regional growth and development which is appropriate, and which is economically and functionally attracted to it.

Objective 4. To promote the development and rehabilitation of economic enterprises including retail, commercial, service, sports and entertainment, manufacturing, industrial and hospitality uses that are intended to provide employment and improve the Project Area's tax base.

Objective 5. To guide growth and development, reinforce viable functions, and facilitate the redevelopment, revitalization or rehabilitation of deteriorated and underutilized areas.

Objective 6. To create a modern, efficient and balanced urban environment for people, including a full range of around-the-clock activities and uses, such as recreation, sports, entertainment and housing.

Objective 12. To provide a full range of employment opportunities for persons of all income levels.

The proposed hotel and retail commercial space and the district's unified signage theme will comply with Objectives 2, 3, 4, and 6. The hotel will provide a 24-hour community in downtown located across the street from the Convention Center and in proximity to regional entertainment destinations such as LA Live and Staples Center. The project will comply with Objective 5 as the site currently consists of a two-story commercial building and surface parking lot which will be demolished and redeveloped with a mixed-use hotel and commercial project. The project will achieve Objective 12 by generating new job opportunities within the hotel and the commercial retail and restaurant spaces.

Mobility 2035 Plan, Downtown Street Standards, and Los Angeles Sports and Entertainment District Streetscape Plan

The Los Angeles Sports and Entertainment District Streetscape Plan provides guidelines and standards for improvements in the public right-of-way within the Los Angeles Sports and Entertainment District and along Figueroa Street from 7th Street to Venice Boulevard. The principal objective of this Streetscape Plan is to develop attractive, functional, and safe streets and pedestrian friendly sidewalks that connect to and complement the Downtown context. The Streetscape Plan contains provisions regarding street widths, sidewalk widths, sidewalk paving, street trees, street furniture, pedestrian lighting, and public signage, which are applicable to the adjacent portions of Figueroa Street and Flower Street along the Project Site. Pico Boulevard is not subject to the standards of the Streetscape Plan.

Improvement conditions (T-conditions) of the proposed zone require that the Project provide dedications and improvements along Figueroa Street, Flower Street, and Pico Boulevard consistent with the Mobility 2035 Element, Downtown Street Standards, and the Streetscape Plan, which will include the following:

Figueroa Street - A five-foot strip of land will be dedicated along Figueroa Street to improve the street to Modified Boulevard II standards, by maintaining the existing roadway and the elements of the MyFigueroa capital improvement project (which will include a Class I protected bike lane and bus-only lane) and providing new 15-foot sidewalks and an additional 9-foot wide sidewalk easement. Sidewalk paving, street lights, and street trees will be in accordance with the design standards of the LASED Streetscape Plan.

Flower Street - A ten-foot strip of land will be dedicated along Flower Street to improve the street to Modified Avenue I standards, by maintaining the existing roadway, and installing a new 20-foot wide sidewalk. Sidewalk paving, street lights, and street trees will be in accordance with the design standards of the LASED Streetscape Plan.

Pico Boulevard - The existing right-of-way will be merged into the property along the western portion of street and a fifteen-foot strip of land will be dedicated from the property to the right-of-way along the eastern portion of the street to provide improvements according to Modified Boulevard II standards. The existing roadway will be maintained, which exceeds the roadway width requirements of the Downtown Street Standards, and new sidewalks will be installed in accordance with the variable 15-foot to 18-foot wide sidewalk widths as identified by the Downtown Street Standards.

The proposed mixed-use development and Sign District is consistent with the General Plan Framework, Community Plan, land use designations, Downtown Design Guide, Redevelopment Plan, Mobility 2035 Element, and LASED Streetscape Plan. The project will redevelop an underutilized site currently comprised of low-rise commercial buildings and

surface parking and replace it with a modern high-rise development consisting of hotel, restaurant, and retail uses. The project will provide much needed hotel rooms that will serve the adjacent Convention Center, Staples Center, and other surrounding entertainment uses. The proposal would also improve the economic vitality of the area by integrating a mix of uses in-line with Plan policies for redevelopment and growth the Downtown Center. The project design will further activate the adjacent street level areas, create an inviting pedestrian environment, and will create a unified aesthetic and signage program. In addition, public right-of-way improvements have been imposed as conditions of approval for the project, consistent with City street standards. Therefore, as conditioned, the proposed project and Sign District is consistent with the General Plan and the proposed land use designation and will serve to implement the goals and objective of the adopted Community Plan.

B. ENTITLEMENT FINDINGS

1. SIGN DISTRICT:

a) The proposed Sign District is in conformance with the public necessity, convenience, general welfare and good zoning practice.

The unique characteristics of the district will be enhanced by the imposition of special sign regulations designed to enhance the theme or unique qualities of the district. The project proposes a comprehensive sign program for the 3.86-acre area, primarily focused on the connection between the Convention Center and the Metro Pico Station.

The Figueroa and Pico Sign District (Sign District) is located directly across Figueroa Street from the Los Angeles Convention Center (LACC), near the Staples Center and LA Live, adjacent to rail transit, and in proximity to several hotels and entertainment venues where unique sign regulations are required to accommodate the convention, entertainment, community, and business character of the properties in and around the District. Due to the unique nature of the Sign District location, the proposed signage would be generally appropriate for the use of the site and in-line with other signage regulations within the South Park District and the City's signage policies. In particular, the Sign District would support the Figueroa corridor's identity as an entertainment district, compatible with venues that have regional draws, such as LA Live and the Convention Center. The Sign District ordinance proposes specially tailored dynamic signage regulations that will advance the goals for redevelopment of the area by creating an engaging visual environment for visitors and residents of the district. The proposed sign program creates a unified aesthetic and sense of identify by setting standards for uniform signage design, instilling flexibility in signage design and architectural lighting, providing well-planned placement of signage with consideration for surrounding uses, while also providing functional way-finding and building identification along streets, thereby connecting regional transit, entertainment, and Convention Center areas.

As such, the Sign District conforms to the public necessity, convenience, and general welfare of the city.

The signage regulations reflect good zoning practice in that they establish signage design criteria, standards, locations, illumination levels, and types of permitted and prohibited signs within the district. Appropriate and balanced sign regulations are necessary to maintain compatibility with surrounding development while fostering a vibrant urban environment. As such, large-scale and digital signage has been concentrated along the Figueroa Street and Pico Boulevard commercial corridors, which could be leveraged to add vibrancy and dynamicity along the corridors, and also includes dedicated advertising to promoting public

transit and the City's Convention Center. Greater restrictions on the signage types facing Pico Boulevard and Flower Street have been included to reduce impacts to the adjacent residential uses to the south, and illumination standards of the Sign District would restrict light pollution. In addition, digital displays and supergraphic signage will be installed in tandem with a program for the removal of off-site signage within the local vicinity, consistent with community policies and interests in improving the community aesthetic and reducing blight. The Sign District would establish regulations that allow signs which are appropriate for the context of the regional tourism and entertainment center.

In addition, the proposed Sign District meets the technical requirements for establishment of the district, as defined in LAMC Section 13.11. On July 1, 2016, the City Council voted to instruct the Department of City Planning to initiate a Sign District for Figueroa and Pico development site and surrounding properties (Council File No. 16-0725), and the Sign District was initiated by the Director of Planning on November 4, 2016. The zoning for Subarea A is proposed as (T)(Q)C2-2D-O-SN and Subarea B is within the Los Angeles Sports and Entertainment District Specific Plan (LASED zone). The LASED zone is a commercial zone, as the LASED provides for the continued and expanded development of the site as a major entertainment and regional destination, allowing for a variety of commercial and residential development typical of the C zone. In addition, the regulations of the Sign District do not supersede any regulations of the LASED, and the Sign District has no regulatory effects on existing signage rights pursuant to the LASED. The Sign District comprises an entire contiguous city block between 12th Street and Pico Boulevard, with a land area total of 3.86 acres. Therefore, the district meets the technical requirements defined in the Code, as it was initiated by the Director of Planning, only includes properties in the commercial "C" zone (or equivalent LASED zone), the site contains at least one block or three acres in area, and the district includes only contiguous parcels.

C. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) FINDINGS

I. INTRODUCTION

The City of Los Angeles (the "City"), as Lead Agency, has evaluated the environmental impacts of implementation of the Fig+Pico Conference Center Hotels Project by preparing an environmental impact report (EIR) (Case Number ENV-2016-2594-EIR/State Clearinghouse No. 2016121063). The EIR was prepared in compliance with the California Environmental Quality Act of 1970, Public Resources Code Section 21000 et seq. (CEQA) and the California Code of Regulations Title 15, Chapter 6 (the "CEQA Guidelines"). The findings discussed in this document are made relative to the conclusions of the EIR.

CEQA Section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" The procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." CEQA Section 21002 goes on to state that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles announced in CEQA Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See CEQA Section 21081[a]; CEQA Guidelines Section 15091[a].) For each significant environmental impact identified in an EIR for a proposed project, the approving

agency must issue a written finding, based on substantial evidence in light of the whole record, reaching one or more of the three possible findings, as follows:

1) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant impacts as identified in the EIR.

2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been, or can or should be, adopted by that other agency.

3) Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

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 Environmental Impact Report for the project as fully set forth therein. Although Section 15091 of the CEQA Guidelines does not require findings to address environmental impacts that an EIR identifies as merely "potentially significant", these findings nevertheless fully account for all such effects identified in the Final EIR for the purpose of better understanding the full environmental scope of the Project. For each environmental issue analyzed in the EIR, the following information is provided:

The findings provided below include the following:

- Description of Significant Effects - A description of the environmental effects identified in the EIR.
- Project Design Features - A list of the project design features or actions that are included as part of the Project.
- Mitigation Measures - A list of the mitigation measures that are required as part of the Project to reduce identified significant impacts.
- Finding - One or more of the three possible findings set forth above for each of the significant impacts.
- Rationale for Finding - A summary of the rationale for the finding(s).
- Reference - A reference of the specific section of the EIR which includes the evidence and discussion of the identified impact.

With respect to a project for which significant impacts are not avoided or substantially lessened either through the adoption of feasible mitigation measures or feasible environmentally superior alternatives, a public agency, after adopting proper findings based on substantial evidence, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's benefits rendered acceptable its unavoidable adverse environmental effects. (CEQA Guidelines §15093, 15043[b]; see also CEQA § 21081[b].)

Pursuant to CEQA Section 21081.6(a)(2) and CEQA Guidelines Section 15091(e), the documents and other materials that constitute the record of proceedings upon which the City has based its decision are located in and may be obtained from the Department of City Planning, as the custodian of such documents and other materials that constitute the record of proceedings, located at City Hall, 200 North Spring Street, Room 750, Los Angeles, CA 90012.

II. ENVIRONMENTAL DOCUMENTATION BACKGROUND

For purposes of CEQA and these Findings, the Record of Proceedings for the Project includes (but is not limited to) the following documents:

Notice of Preparation. In compliance with CEQA Guidelines §15375 and §15082, the City published the Notice of Preparation (the "NOP"), which was sent to responsible agencies and members of the public for a 33-day review period commencing December 22, 2016 and ending January 23, 2017, identifying the scope of the environmental issues. The purpose of the NOP was to formally convey that the City was preparing a Draft EIR for the proposed Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. The NOP and Initial Study are provided in Appendices A-1 and A-2 to the Draft EIR.

Public Scoping Meeting. In compliance with CEQA Guidelines §15206 and §15082(c)(1), as a project of regional significance, a Public Scoping Meeting was held on January 10, 2017 at the Convention Center, Meeting Room 510, located at 1201 S. Figueroa Street, Los Angeles, CA 90015. The meeting was held in an open house or workshop format and provided interested individuals, groups, and public agencies the opportunity to view materials, ask questions, and provide oral and written comments to the City regarding the scope and focus of the Draft. The scoping meeting materials and other documentation from the Scoping Meeting are provided in Appendix A-3 of the Draft EIR. No written comments were received at the public scoping meeting. Letters and comments received during the NOP comment period are included in Appendix A-4 of the Draft EIR.

Draft EIR. The Draft EIR for the Project, which is incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and City of Los Angeles (City) CEQA Guidelines (Public Resources Code Section 21000, et seq., 14 California Code of Regulations Section 15000, et seq., City of Los Angeles Environmental Quality Act Guidelines). The Draft EIR evaluated in detail the potential environmental effects of the Project. The Draft EIR also analyzed the effects of four alternatives to the Project, as described below. These included a No Project/No Build Alternative, Reduced Hotel Rooms (Two Towers), Reduced Hotel Rooms (Single Tower), and Mixed-Use Hotel, Commercial, Residential.

In accordance with the provision of Sections 15085(a) and 15087(a)(1) of the State CEQA Guidelines, the Draft EIR was distributed for public review (including the State Clearinghouse) for a 47-day review period, starting on September 14, 2017 and ending on October 30, 2017. A Notice of Availability (NOA) was distributed to all property owners within 500 feet of the Project Site and Sign District Boundary and interested parties, which informed them of where they could view the document and how to comment. The Draft EIR was available to the public at City Hall, Department of City Planning, and the following local libraries: Los Angeles Central Library, Little Tokyo Branch Library, Felipe de Neve Branch Library, and Pico Union Branch Library. A copy of the document was also posted online at https://planning.lacity.org/eir/FigPico/DEIR_Website.html. Notices were filed with the County Clerk on September 14, 2017.

Notice of Completion. A Notice of Completion was sent with the Draft EIR to the Governor's Office of Planning and Research State Clearinghouse for distribution to State Agencies on September 14, 2017, and notice was provided in newspapers of general and/or regional circulation.

Final EIR. A total of 13 comment letters were received by the close of the public comment period, and three additional comment letters were submitted after the close of the comment period. The specific and general responses to comments are in Chapter 2 (Responses to

Comments) of the Final EIR. The Final EIR and responses to public agency comments were distributed on January 12, 2018.

Errata. An Errata was completed on February 7, 2018 to make minor corrections to the Final EIR. The Errata addressed the omission of two mitigation measures for cultural resources, which were identified in the Initial Study, but were inadvertently omitted in the Final EIR's Mitigation Monitoring Program (MMP). The Errata clarifies that the two mitigations should be included in the Mitigation Monitoring Program (MMP), and states that this information does not represent significant new information that would affect the analysis or conclusions presented in the Final EIR.

Certification. On February 9, 2018, the Advisory Agency approved the tract map for the project and certified the EIR. No appeals were filed and the action became final on February 20, 2018.

III. PROJECT DESCRIPTION

Project Location and Surrounding Uses

The Project Site proposed for redevelopment is located at 1240-1260 S. Figueroa Street and 601 W. Pico Boulevard, within the Downtown Center of the City of Los Angeles. A City-initiated Sign District is also proposed for the Project Site, as well as for surrounding parcels along Figueroa Street, Flower Street, and Pico Boulevard.

The Project Site and Sign District sites are located in a regional center which serves as a commercial and entertainment center for Los Angeles and the surrounding communities. The Project area is characterized by a mix of regional entertainment, commercial, restaurant, bar, office, and high-rise mixed-use residential uses. High-rise mixed-use residential and commercial buildings, extensive signage, and regional entertainment attractions define the general urban character in the Project vicinity. The Los Angeles Sports and Entertainment District (LASED) Specific Plan area is immediately to the north and west of the Project Site. Immediately to the west of the Project Site across S. Figueroa Street is the Convention Center and Gilbert Lindsay Plaza, a 5-acre landscaped public plaza near the main entrance to the Convention Center. Just north of the Convention Center and northwest of the Project Site is Staples Center Arena, which is a multipurpose sports and entertainment venue. Farther northwest of the Project Site is LA LIVE, which contains entertainment, hotel, restaurant, and residential uses. Directly north of the Project Site is the Circa project at 1200 S. Figueroa Street. Circa is under construction with anticipated completion in 2018 and would comprise two 36-story high-rise towers containing 648 residential units above a seven-level podium with 48,600 square feet of retail space.

Existing Project Site Conditions

The Project Site is an irregularly-shaped 1.22 net acre (52,948 square-foot) site, generally bound by Figueroa Street to the west, Pico Boulevard to the south, Flower Street to the east, and the under-construction Circa mixed-use development to the north. The site is bisected by a public alley located mid-block between Figueroa Street and Flower Street, with access from Pico Boulevard, and which terminates at the northern Project boundary. Currently, a two-story 27,800-square-foot commercial building and surface parking lots occupy the Project Site. The building and parking lots would be demolished and removed as part of the Project.

The combined properties within the Sign District boundary total approximately 4.35 acres. The existing conditions in this area include surface parking lots, commercial establishments on the Project Site, limited retail and residential uses, construction sites for high-density residential towers, and commercial buildings fronting the Metro rail station.

Existing Land Use and Zoning Designations

The Project Site is located in the Central City Community Plan Area and City Center Redevelopment Project Area. The General Plan land use designation for the Project Site is Regional Center Commercial for the lots west of the alley and High Density Residential for the lots east of the alley. The Project Site is zoned C2 (Commercial) within the western portion of the site and R5 (Multiple Dwelling Residential) within the eastern portion of the site. The parcels fronting Figueroa Street are zoned C2-4D-O, with "4" denoting Height District 4, the "D" denoting a 6:1 FAR, and the "O" indicating that the parcels are in an Oil Drilling District. The parcels fronting S. Flower Street are zoned [Q]R5-4D-O, with the "R5" denoting a Multiple Dwelling Residential zone, the "4" denoting Height District 4, the "D" denoting a 6:1 FAR, the "Q" Qualified condition denoting restrictions on permitted uses and FAR, and the "O" denoting an Oil Drilling District.

Project Characteristics

Original Project

A development proposal for the Fig+Pico Conference Center Hotels project was originally submitted to the Department of City Planning in November 2016. The initial project proposed a mixed-use development with up to 1,162 guest rooms and 13,145 square feet of ground-floor retail/restaurant uses within two hotel towers ("Hotel A/B Tower" and "Hotel C Tower"), totaling up to 506,682 square feet of floor area. The Hotel A/B Tower was slated to include 820 hotel guest rooms, 11,000 square feet of ground-floor retail/restaurant uses, and podium parking for all three hotels within a 42-story, 529-foot tower on the northeast corner of S. Figueroa Street and W. Pico Boulevard. The Hotel C Tower was designed with 342 guest rooms and 2,145 square feet of ground-floor retail/restaurant uses in a 25-story, 326-foot tower located on the northwest corner of W. Pico Boulevard and S. Flower Street.

Revised Project

After the project was presented at the February 7, 2018 public hearing, the applicant revised the building design and interior utilization of the towers in response to public comments. The current proposal includes reductions in the total number of guest rooms, building floor area, and the maximum building height of the overall development. In addition, some of the hotel guest rooms and building height have shifted from the Hotel A/B Tower to the Hotel C Tower, and certain hotel amenities have been incorporated into the podium elements of both towers.

The current revised proposal for the Fig+Pico Conference Center Hotels project involves a two-tower development encompassing three hotel brands, with up to a total of 1,153 guest rooms and 13,145 square feet of ground-floor retail/restaurant uses. The two towers ("Hotel A/B Tower" and "Hotel C Tower") are proposed as follows:

Hotel A/B Tower Details

The Hotel A/B Tower would include up to 775 hotel guest rooms, 11,000 square feet of ground-floor retail/restaurant uses, and podium parking with 330 total spaces for all three hotels within a 38-story, 465-foot tower on the northeast corner of S. Figueroa Street and W. Pico Boulevard. The Hotel A/B Tower would develop 31-stories of hotel uses atop a seven-story podium. The 90-foot podium would be a continuation of the street wall formed by the neighboring podium of the Circa mixed-use development to the north along Figueroa Street. The primary lobby for Hotel B and a small satellite lobby for Hotel A would be situated on the ground floor of the tower, with direct access from Pico Boulevard and from an interior motor court located off the Pico Boulevard mid-block alley. In addition, approximately 11,000 square feet of ground-floor

commercial space would be accessible from both Pico Boulevard and Figueroa Street. The remainder of the podium's floors would contain 330 parking spaces and mechanical equipment, screened from the street with architectural elements and signage. The podium's 7th floor would also include 9,490 square-feet of hotel meeting rooms, overlooking Pico Boulevard and the interior porte-cochere. The hotel's 8th floor would include a landscaped pool deck and third-party-operated indoor and outdoor food and beverage facilities. The outdoor deck would be programmed with activities and music that would complement the food and beverage operations. Hotel amenities would continue on the 9th floor, where indoor and outdoor fitness centers would be exclusively available to hotel guests. Floors 11 through 34 would contain up to 775 guest rooms. The 7,400 square-foot sky lobby for Hotel A would be based on the 35th floor, opening out into a publically-accessible landscaped viewing deck. Floors 36 through 38 would be stepped back from the lower floors and house a variety of functions. The 37th floor would contain an additional 7,500 square-foot indoor food and beverage area and a limited outdoor terrace. Floors 36 and 38 would house mechanical equipment serving the building. The tower would also include architectural lighting, and on-site and off-site signage.

Hotel C Tower Details

The Hotel C Tower would include up to 378 guest rooms and 2,145 square feet of ground-floor retail/restaurant uses in a 27-story, 350-foot tower located on the northwest corner of W. Pico Boulevard and S. Flower Street. The ground floor of the tower would contain approximately 2,145 square feet of commercial space along Pico Boulevard and Flower Street, as well as a hotel lobby accessible from Pico Boulevard. The second level of the 67-foot podium would accommodate 9,000 square-feet of guest amenities overlooking the street, and mechanical equipment on the floor above screened with exterior signage. No parking would be provided within the Hotel C podium. Hotel tower floors 4 through 24 would house up to 342 guest rooms. A rooftop pool deck with guest amenities would be sited on the 25th floor. Above this level, the building would be stepped back from the lower floors and would constitute a two-level housing and enclosure for mechanical equipment serving the building. The tower would also include architectural lighting, and on-site and off-site signage.

Since the project modifications have resulted in a reduction to the original project's number of hotel units and a reduction to the project's overall height, the revised project's impacts would be equivalent to or less than those of the original project. Therefore, all analyses, impacts, conclusions, and findings resulting from the original project, as described below, apply to the current project.

Requested Entitlements

Approvals required for development of the project include, but are not limited to, the following:

- City-initiated General Plan Amendment pursuant to LAMC Sections 11.5.6 and 12.32.A and City Charter Section 555 from High Density Residential to Regional Center Commercial to create General Plan Land Use Designation consistency.
- City-initiated Zone Change and Height District Change pursuant to LAMC Section 12.32 from [Q]R5-4D-O and C2-4D-O to C2-4-SN to permit an FAR of 10:1 by-right and up to 13:1.
- City-initiated "SN" Sign District pursuant to LAMC Sections 13.11 and 12.32.S on the Project Site and certain surrounding parcels for a comprehensive set of sign regulations.
- Conditional Use Permit pursuant to LAMC Section 12.24.W.24 to permit a hotel located within 500 feet of an R Zone.
- Conditional Use Permit for FAR averaging across a unified development pursuant to

LAMC Section 12.24.W.19.

- Master Conditional Use Permit pursuant to LAMC Section 12.24.W.1 to permit the sale and dispensing of a full line of alcoholic beverages for on-site consumption.
- Conditional Use Permit pursuant to LAMC Section 12.24.W.18 to permit live entertainment and dancing.
- Site Plan Review pursuant to LAMC Section 16.05 for a development project that creates 50 or more guest rooms.
- Vesting Tentative Tract Map for the subdivision of the Project Site pursuant to LAMC Section 17.15 and establishment of dedications, easements, or vacations as necessary.
- Approvals for building, shoring, excavation, foundation, encroachment, and other related permits to allow construction of the Project.
- Temporary street closures and haul route approvals, as needed, during the construction process.
- Other approvals and permits as may be required to construct and operate the Project.

Other agreements and approvals required to implement the Project would include, but would not necessarily be limited to, the following:

- Development Agreement between the City of Los Angeles and the Applicant.
- Hotel Development Incentive Agreement between the City of Los Angeles and the Applicant.
- Purchase and Sale Agreement between the City of Los Angeles and the Applicant for the City parcels within the Project Site.

IV. NO IMPACT OR LESS THAN SIGNIFICANT IMPACTS WITHOUT MITIGATION

Impacts of the Project that were determined to have no impact or be less than significant in the EIR (including having a less than significant impact as a result of implementation of project design features and regulatory compliance measures) and that require no mitigation are identified below. The City has reviewed the record and agrees with the conclusion that the following environmental issues would not be significantly affected by the Project and therefore, no additional findings are needed.

These findings do not repeat the full discussions of environmental impacts contained in the EIR. The City ratifies, adopts, and incorporates the analysis, explanation, findings, responses to comments, and conclusions of the EIR. The City adopts the reasoning of the EIR, City staff reports, and presentations regarding the Project.

Aesthetics, Views, Light/Glare, and Shading

SB 743

The Project is considered an employment center project because it is located on parcels that permit commercial uses, has a floor area ratio above 0.75, and is located approximately 100 feet from a rail transit station that qualifies as an urban transit priority area (less than 0.50 mile from a major transit station). Thus, the Project qualifies under SB 743 and Public Resources Code Section 21099 applies to the Project. Therefore, the Project is exempt from aesthetic impacts and any aesthetic impacts conclusions cannot be considered a significant impact on the environment. Pursuant to SB 743, the Project would have no impact on aesthetic resources.

However, the following provides a description of the Project's impacts for informational purposes.

Substantial Adverse Effect on a Scenic Vista

The Project Site is situated in an urbanized area of Downtown Los Angeles on relatively flat terrain. The Project Site and surrounding high-rises contribute to the views of the downtown skyline, which is considered a recognized and valued public view resource, visible several public vantage points.

Pursuant to SB 743, Project construction and operation would result in no impact to scenic vistas. Notwithstanding, the Project would include the installation of temporary construction fencing along the north, south, east and west perimeters of the Project Site with a minimum height of 8 feet, as provided in PDF AES-1. In addition, as set forth in PDF AES-4, all light sources associated with construction of the Project would be shielded and/or aimed so that no direct beam illumination would be provided outside of the Project Site boundary. *During* operation, the Project would screen utilities and loading areas, as provided in PDF AES-2. In addition, as set forth in PDF AES-3, glass and other building materials used in exterior facades would be low reflective and/or treated with a non-reflective coating to minimize glare.

Scenic Resources within a State Scenic Highway

The Project Site is not located within a State-designated scenic highway or associated view corridor. Consequently, the Project Site does not contain any trees, rock outcroppings, or historic buildings that are within a state scenic highway or associated corridor. Pursuant to SB 743, the Project would result in no impact to scenic resources within a state scenic highway.

Visual Character

Construction

The Project Site contains no features that substantially contribute to the valued visual character or image of the Project Site or neighborhood. The south wall of the existing commercial building currently contains a portrait/mural of Muhammad Ali, which would be removed. The mural is not registered with the City's Department of Cultural Affairs, and removal at the time of Project construction would meet the two-year time criteria under City's Mural Ordinance.

Pursuant to SB 743, demolition of existing on-site improvements as part of Project construction would have no impact with respect to the degradation of the existing visual. Nonetheless, construction fencing would be provided for safety and to screen views of grading and other site disturbance from adjacent streets and sidewalks (PDF AES-1).

Operation

The Project would be constructed in a contemporary architectural style, complementary with other development in the surrounding neighborhood. After approval by the City, the Sign District would be implemented on the Project Site and certain surrounding parcels. It would permit signage on and around the Project Site that is generally consistent with the extensive signage in the LASED and adjacent projects under development, and is intended to include signage elements that create visual continuity with the South Park district's visual identity.

These proposed changes, including proposed new development on the Project Site and the Sign District, would contribute to the aesthetic value of the area and would not degrade the

Project Site or surrounding neighborhood by introducing elements that would substantially degrade the existing visual character or quality of the area.

Pursuant to SB 743, Project operation would result in no impact to visual character or quality. Notwithstanding, all mechanical equipment and loading areas will be interior or screened in accordance with PDF AES-2.

Light and Glare

Construction

It is expected that construction activities would occur primarily during daylight hours and that construction-related illumination in the nighttime would be used for safety and security purposes only, and would be compliance with LAMC requirements, and would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Pursuant to SB 743, Project construction would result in no impact to light or glare.

Operation

Signage Glare

The Lighting Technical Report (Appendix B to the Draft EIR) identifies potential signage on the Project Site that could be permitted by the Sign District if approved by the City. Proposed signage would be visible from a number of off-site vantages that surround the Project Site. The Lighting Technical Report contains detailed analysis that compares signage lighting luminance levels at buildout to the calculated baseline luminance levels. The analysis considers light trespass and glare from signage within the Sign District on the Project Site, as well as architectural and building lighting. The Lighting Technical Report demonstrates that the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Pursuant to SB 743, Project operation would result in no impact to light or glare.

Building Lighting Glare

The Project's building lighting would be visible from the properties surrounding the Project Site. The Lighting Technical Report, defines a lighting design program for the Project that limits the glare at adjacent properties by shielding the light sources and restricting the Project's building lighting to the Project Site. The Lighting Technical Report demonstrates that the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Pursuant to SB 743, Project operation would result in no impact to light or glare.

Glare from Reflected Sunlight

The Project would introduce high-rise towers that have the potential to reflect sunlight at certain hours of the day with respect to drivers on northbound S. Figueroa Street. PDF AES-3 requires that glass and other building materials used in exterior façades must be low reflectivity and/or treated with a non-reflective coating in order to minimize glare. Prior to issuance of a building permit, the LADBS would review the exterior building materials to confirm that they do not exceed the reflectivity of standard building materials. Pursuant to SB 743, the Project would result in no impact related to glare from reflected sunlight.

Light Trespass from Building Lighting

The Lighting Technical Report defines a program for the Project that limits the light trespass from building light sources to a maximum of 0.74 fc at night, in accordance with the CalGreen Code. The report provides detailed quantitative analysis of lighting levels at grade and a variety of vertical zones and concludes that impacts are not significant. Pursuant to SB 743, the Project would result in no impact related to light from building lighting.

Light Trespass from Signage

The operation of the Project has the potential for light trespass associated with illuminated signage. The Lighting Technical Report indicates the level of potential light trespass at receptor site around the Project Site. The Lighting Technical Report quantitatively analyzed signage lighting levels that could be a maximum of 500 cd/m^2 at night, including 45 minutes before sunset until 45 minutes after sunrise, and 6000 cd/m^2 during the day. Pursuant to SB 743, the Project would result in no impact related to light trespass from signage.

Shading

The Project would add new buildings to the Project Site including a 42-story building (Hotel A/B Tower) rising to a maximum height of 529 feet, and a 25-story building (Hotel C Tower) rising to a maximum height of 326 feet.

Project shadows during the winter would extend into Gilbert Lindsay Plaza and small sections of the land use directly to the north of the Project Site. The majority of the may be within the overlapping areas of shade caused by the Project. Nonetheless, pursuant to SB 743, the Project would result in no significant shading impact on these uses.

During the spring, at 9:00 A.M., the shadow from the Project would extend to the west of S. Figueroa Street into Gilbert Lindsay Plaza. As shown in Figure 4.1-23 in the Draft EIR, overlapping colored polygons representing the areas in which shading would exceed four consecutive hours between 9:00 A.M. and 5:00 P.M. would affect a triangular section of the Circa project, with open space amenities and courtyards, directly to the north of the Hotel C Tower. Nonetheless, pursuant to SB 743, the Project would result in no significant shading impact on these uses.

Project shadows during the summer the shadow from the Project would extend to the west of S. Figueroa Street into the south edge of Gilbert Lindsay Plaza at 9:00 A.M. As shown in Figure 4.1-24 of the Draft EIR, the majority of the Circa project would not be shaded by the Project and no section of the Circa project would be shaded for more than four consecutive hours.

Project shadows during autumn would extend to the west of S. Figueroa Street into Gilbert Lindsay Plaza. As shown in Figure 4.1-25 of the Draft EIR, overlapping colored polygons representing the areas in which shading would exceed four consecutive hours between 9:00 A.M. and 5:00 P.M. would affect a triangular section of the Circa project, with open space amenities and courtyards, directly to the north of the Hotel C Tower. Nonetheless, pursuant to SB 743, the Project would result in no significant shading impact on these uses.

Cumulative

Visual Character and Quality

The Project and the related projects extend the City's high-rise cluster (currently concentrated in the City's Financial District) south along S. Figueroa Street. This trend is changing the height

nodes in the City's skyline yet remains consistent with the dense urban core aesthetic characteristics of downtown. Figure 4.1-19 in the Draft EIR, Existing and Simulated Aerial Views from the South, is an aerial view of the existing Project area and simulated future conditions that illustrates the Project in combination with related projects would form a continuous line of high-rise development between S. Figueroa Street and S. Flower Street, from Olympic Boulevard to just south of W. Pico Boulevard. The development of the Project and the related projects is consistent with the urban and evolving aesthetic character of downtown.

Related projects on S. Figueroa Street between W. Olympic Boulevard to just to the south of Pico Boulevard are located in proximity to the Convention Center, Staples Center, and LA LIVE. These projects would feature a broad band of LED lighting and other signage at the podium level consistent with signage exemplified by LA LIVE. The signage would intensify the existing visual character of S. Figueroa Street. In addition, since similar signage currently occurs in the area, the Project's and the related projects' signage would not introduce an unfamiliar or inconsistent feature within the already vibrant environment or substantially detract from the existing visual character of the Project area. Nevertheless, SB 743 provides that aesthetic impacts, including visual character and quality, are not considered significant impacts. Therefore, the Project and related projects' potential aesthetic impacts are not significant.

Views

The City's high-rise component forms the backdrop for views across the Project area. Since related projects are grouped to the south of the Financial District, the cumulative projects have the potential to block some views of the existing downtown skyline from the south. Nevertheless, SB 743 provides that aesthetic impacts, including views, are not considered significant impacts. Therefore, the Project and related projects' potential aesthetic impacts are not significant.

Shading

With the greater intensity and density of development, shading within the study area would increase and cast shadows on surrounding uses particularly during the late fall, early spring, and winter months. However, SB 743 provides that aesthetic impacts, including shading, are not considered significant impacts. Therefore, the Project and related projects' potential aesthetic impacts are not significant.

Project Design Features

PDF AES-1: Construction Fencing: During construction of the Project, a construction fence for safety and to screen views to the Project Site shall be installed. The fence shall be located along the north, south, east and west perimeters of the Project Site with a minimum height of 8 feet.

PDF AES-2: Screening of Utilities and Loading Areas: All utilities associated with the Project shall be screened from public view. All loading areas shall be located interior to the buildings or screened from public view.

PDF AES-3: Glare: Glass and other building materials used in exterior façades shall be low reflective and/or treated with a non-reflective coating in order to minimize glare. Prior to issuance of a building permit, the Department of Building and Safety shall review the exterior building materials to confirm that they do not exceed the reflectivity of standard building materials permitted by the applicable building codes, and shall not cause significant glare impacts on motorists or nearby residential uses. Glass with coatings required to meet the California Energy Code requirements shall be permitted, consistent with applicable energy and

building code requirements, including Section 140.3 of the California Energy Code as may be amended.

PDF AES-4: Light sources associated with Project construction shall be shielded and/or aimed so that no direct beam illumination is provided outside of the Project Site boundary.

Conclusion

With the implementation of the Project Design Features identified above and compliance with existing regulations, the Project would not result in significant impacts related to scenic vistas, scenic resources within a state scenic highway, visual character, views, light and glare, and cumulative impacts. In addition, potential aesthetic impacts associated with the Project cannot be determined significant impacts by law. Therefore, no mitigation measures were included in the EIR.

Agricultural and Forest Resources

The Project Site is located in an urbanized area of the City. No agricultural uses or operations occur onsite or in the vicinity of the Project Site. In addition, the project site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation. The project site is also not zoned for agricultural use and no agricultural zoning is present in the surrounding area. Furthermore, the Project Site and surrounding area are not enrolled under a Williamson Act Contract. Additionally, the project site does not include any forest or timberland, is not zoned for forest land, and is not used as forest land. As such, the project will not convert farmland to a non-agricultural use; will not conflict with any zoning for agricultural uses or a Williamson Act Contract; will not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined in the applicable sections of the Public Resources Code; will not result in the loss or conversion of forest land; and will not result in the conversion of farmland to non-agricultural use. Therefore, no impacts to agricultural and forest resources will occur. This impact will also be clearly insignificant and unlikely to occur.

Air Quality

Conflict with or Obstruct Implementation of an Applicable Air Quality Plan

SCAQMD CEQA Air Quality Handbook Policy Analysis

Project development would not have a short-term or long-term impact on the region's ability to meet state and federal air quality standards. Also, the Project would be consistent with the goals and policies of the AQMP would not exceed the assumptions used in the preparation of the AQMP. The Project would comply with all applicable regulatory standards as required by SCAQMD

The Project's increase in employment is consistent with SCAG projections for the City and the Project would be consistent with the AQMP. The Project would therefore also be consistent with the growth projections as contained in the City's General Plan, and ultimately consistent with the growth projections in the AQMP, since the growth would occur in a transit rich area, which would minimize potential growth in transportation-related emissions. Therefore, impacts would be less than significant.

General Plan Air Quality Element

The Project is consistent with the applicable policies of the City of Los Angeles General Plan Air Quality Element. The Project would provide opportunities for the use of alternative modes of transportation, including convenience access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle miles traveled. Furthermore, the Project includes neighborhood-serving retail uses, close proximity to job centers, and commercial destinations. The Project would be designed and operated to meet the applicable requirements of CALGreen and the City of Los Angeles Green Building Code. The Project would incorporate sustainability measures and performance standards and would include increase the amount of landscaped areas on the Project Site compared to existing conditions. Therefore, the Project would serve to implement applicable policies of the City of Los Angeles pertaining to air quality.

Air Quality Standards

Regional Construction Impacts

Construction emissions were compared to the following South Coast Air Quality Management District (SCAQMD) prescribed daily regional numeric indicators. If construction emissions exceed any of these numeric indicators in the SCAQMD CEQA Air Quality Handbook, the Project would potentially cause or contribute to an exceedance of an ambient air quality standard. Construction-related daily maximum regional construction emissions will not exceed any of SCAQMD daily significance thresholds. The calculations include appropriate dust control measures required to be implemented during each phase of construction, as required by SCAQMD Rule 403 (Control of Fugitive Dust). The Project would also incorporate PDF AQ-2 and TRAF-1 to ensure impacts would be less than significant. Therefore, with respect to regional emissions from Project construction activities, impacts would be less than significant.

Localized Construction Impacts

Localized emissions related to construction activities would remain below the applicable SCAQMD daily localized numeric thresholds for NO_X, CO, PM10, and PM2.5. Therefore, with respect to localized construction emissions resulting from the Project, air quality impacts would be less than significant. The Project would also incorporate PDF AQ-2 and TRAF-1 to ensure impacts would be less than significant.

Health Impacts Assessment

Construction would result in emissions from fossil fuel combustion (primarily diesel) from off-road equipment and from on-road haul trucks and vehicles traveling on local roadways and regional freeways within the Air Basin. The primary pollutant of concern during construction activities is NO_X since the Air Basin is nonattainment for ozone and NO_X is an ozone precursor. Project-related construction activities would not exceed SCAQMD regional significance thresholds. As Project construction emissions would be less than these thresholds, the potential for the Project to cause or contribute to regional health impacts from the emissions of criteria pollutants construction would be less than significant. Accordingly, the Project would not generate emissions at a level sufficient to adversely affect human health locally or regionally, or create a level of adverse air emissions that would force residents in the area to modify their activities in a meaningful way. The Project would also incorporate PDF AQ-2 and TRAF-1 to ensure impacts would be less than significant.

Regional Operational Impacts

The increase in operational-related daily emissions for the criteria and precursor pollutants (VOC, NO_X, CO, SO_2, PM10, and PM2.5) would be below the SCAQMD thresholds of significance for the Project buildout year (2022) analysis when all uses, including both towers and all commercial uses, would be fully operational. Therefore, with respect to regional operational emissions resulting from the Project, air quality impacts would be less than significant. The Project would also incorporate PDF AQ-1 and AQ-3 to ensure impacts would be less than significant.

Localized Operational Impacts

The increase in maximum localized operational emissions for sensitive receptors would be below the localized thresholds for NO_X, CO, PM10, and PM2.5 for both the Project under existing conditions (2016) and at full Project buildout (2022) when all uses, including both towers and all commercial uses, would be fully operational. Therefore, with respect to localized operational emissions, air quality impacts would be less than significant. The Project would also incorporate PDF AQ-1 and AQ-3 to ensure impacts would be less than significant.

Sensitive Receptors

Carbon Monoxide Hotspots

Based on the peak traffic volume, the maximum CO concentration due to future plus Project vehicle emissions would be up to 2.8 ppm (1-hour average) and 1.9 ppm (8-hour average). When added to the existing maximum background CO concentrations, the concentrations would be 6.0 ppm (1-hour average) and 4.3 ppm (8-hour average). This level of cumulative traffic at the worst-case intersection associated with the Project is below the traffic levels, and related CO concentrations study in the Air Quality Management Plan (AQMP) as screening levels for further CO hot spot analysis. As a result, CO concentrations associated with the Project would be less than those estimated in the 2003 AQMP, and would not exceed the thresholds. Thus, this comparison demonstrates that the Project would not contribute considerably to the formation of CO hotspots and no further CO analysis is required. The Project would result in less than significant impacts with respect to CO hotspots.

Toxic Air Contaminants

For carcinogenic exposures, the cancer risk from diesel particulate matter (DPM) emissions from construction of the Project is estimated to result in a maximum carcinogenic risk of 4.5 per 1 million. This would be less than the risk threshold of 10.0 in 1 million, and therefore impacts would be considered less than significant. Construction is not expected to result in any non-cancer effects of acute (i.e., hourly) exposures to sensitive receptors. DPM does not have an acute non-cancer risk value. Other pollutants emitted during construction which may have an acute risk are expected to be very minor, and therefore acute impacts would be less than significant. As such, project-related toxic air contaminants (TAC) during construction would be less than significant. The Project would also incorporate PDF AQ-2 and TRAF-1 to ensure impacts would be less than significant.

The Project is not anticipated to generate a substantial number of daily truck trips. Trucks would comply with the applicable provisions of the California Air Resources Board (CARB) Truck and Bus regulation to minimize and reduce particulate matter and NO_X emissions from existing diesel trucks. Based on the limited activity of TAC sources, the Project would not warrant the need for a Health Risk Assessment (HRA) associated with on-site activities, and potential TAC impacts are expected to be less than significant.

In addition, Project operations would only result in minimal emissions of air toxics from maintenance or other ongoing activities, such as from the use of architectural coatings and other products, and would be required to comply with SCAQMD rules applicable to restaurants, emergency generators, and other uses on the site. Based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal and would not exceed the SCAQMD thresholds of significance. Therefore, impacts would be less than significant.

Objectionable Odors

No objectionable odors are anticipated as a result of either construction or operation of the Project. The Project would not introduce any major odor-producing uses that would have the potential to affect a substantial number of people. Odors associated with Project operation would be limited to those associated with on-site waste generation and disposal and occasional minor odors generated during food preparation activities. Activities and materials associated with construction would be typical of construction projects of similar type and size. On-site trash receptacles would be covered and properly maintained in a manner that promotes odor control. Impacts with regard to odors would be less than significant. This impact will also be clearly insignificant and unlikely to occur.

Cumulative

Construction and Operational Emissions

The SCAQMD uses the same significance thresholds for Project-specific and cumulative impacts. Projects that exceed the Project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. Based on the Project-specific level of emissions, the Project's cumulative impacts would be less than significant because its construction and operational emissions, including emissions of non-attainment pollutants of ozone precursors and particulate matter, would be less than significant. Although the Project Site is located in a region that is in non-attainment for ozone, PM10, and PM2.5 under federal and/or state standards, because emissions would fall below SCAQMD daily significance thresholds, the Project's construction-related and operational emissions would not be cumulatively considerable or contribute to cumulatively significant air quality impacts.

Consistency with Air Quality Management Plan

The SCAQMD recommends assessing a project's contribution to cumulative impacts based on whether it is consistent with the AQMP. The Project has incorporated strategies, as applicable, consistent with the AQMP. Project construction would comply with SCAQMD Rule 403 requirements and the Airborne Toxic Control Measures (ATCM) to limit heavy duty diesel motor vehicle idling. In addition, the Project would utilize a construction contractor(s) that complies with required and applicable BACT and the In-Use Off-Road Diesel Vehicle Regulation. The Project would also implement a PDF requiring the use of off-road construction equipment that meets the stringent Tier 4 emissions standards (see PDF AQ-2). Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on other construction projects in the Air Basin as required. As such, the Project's construction emissions would not be cumulatively considerable or contribute to cumulatively significant Air Quality impacts as a result of inconsistency with the AQMP.

The Project's location, design, and land uses also render it consistent with the AQMP. The AQMP includes Transportation Control Measures that are intended to reduce regional mobile source emissions. The Project would locate hotel, retail, and restaurant uses within a quarter-mile of multiple public transportation options. The proposed Project would provide employment consistent with SCAG's growth projections. Because these same projections form the basis of the 2012 AQMP, it is concluded that the Project would be consistent with the projections in the AQMP. Since the Project's employment growth would occur in a TOD corridor, the Project would result in highly transportation-efficient growth, which would minimize potential growth in transportation-related emissions. As such, Project operations would not be cumulatively considerable or contribute to cumulatively significant Air Quality impacts as a result of inconsistency with the AQMP.

Project Design Features

PDF AQ-1: Green Building Measures: The Project shall be designed and operated to include energy and resource efficient features that exceed regulatory requirements, which shall include the following:

- The Project shall include easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials such as paper, corrugated cardboard, glass, plastics, metals, and landscaping debris (trimmings).
- The Project shall install energy efficient appliances that meet the 2017 ENERGY STAR® rating standards or equivalent for both hotel and restaurant land uses.
- The Project shall include efficient heating, ventilation, and air conditioning (HVAC) systems (2017 ENERGY STAR® rating standards or equivalent).
- The parking structure shall be designed with occupancy-sensor controlled lighting that places lighting fixtures in a low power state in unoccupied zones.
- To encourage carpooling and the use of electric vehicles by Project employees, guests, and visitors, the Project shall designate a minimum of 5 percent of on-site parking for carpool and/or alternative-fueled vehicles, and the Project design shall provide for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into 10 percent of the parking spaces.

PDF AQ-2: Construction Features: Construction equipment operating at the Project Site will be subject to a number of requirements. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. Construction measures shall include the following:

- The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 interim off-road emissions standards for equipment rated at 50 horsepower (hp) or greater during Project construction. All equipment shall be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filter or equivalent. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.
- Equipment such as tower cranes and welders shall be electric or alternative fueled (i.e., non-diesel). Pole power shall be made available for use with electric tools, equipment, lighting, etc.
- Alternative-fueled generators shall be used when commercial models that have the power supply requirements to meet the construction needs of the Project are readily available from local suppliers/vendors.

- All on-road heavy-duty diesel trucks with a gross vehicle weight rating of 19,500 pounds or greater used at the Project Site shall be engine model year 2012 or later or shall comply with the USEPA 2007 on-road emissions standards.

PDF-AQ-3: Control of VOCs: The Project shall utilize low-emitting materials pursuant to the requirements of the California Green Building Standards (CALGreen) Code. Indoor coatings shall be limited to 50 grams per liter of VOCs or less.

PDF TRAF-1: Construction Management Plan: A detailed Construction Management Plan shall be submitted to the City's Department of Transportation (LADOT) for review and approval prior to the start of any construction work. The Construction Management Plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. The Construction Management Plan shall formalize how construction shall be carried out and identify specific actions that shall be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following mandatory elements:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Figueroa Street, Flower Street, and Pico Boulevard, to ensure traffic safety on public rights of way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's Figueroa Street, Flower Street and Pico Boulevard driveways.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Sequencing construction activity to reduce the amount of construction-related traffic on arterial streets.
- Contain construction activity within the Project Site boundaries.
- Coordination with LADOT to address any overlapping of construction with the MyFigueroa project.
- Coordination with Metro to address any construction near the railroad right of way.
- Safety precautions for pedestrians and bicyclists through alternate routing and protection barriers/fencing that shall be implemented.
- Scheduling of construction-related deliveries and haul trips so as to occur outside the commuter peak hours.

Conclusion

With the implementation of the PDF's identified above and compliance with existing regulations, the Project would not result in significant impacts associated with air quality. Therefore, no mitigation measures are required.

Biological Resources

Candidate, Sensitive, Special Status Species

No species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service are located on the Project Site. In addition, because of the urbanized nature of the Project Site and Project vicinity, the Project Site does not support habitat for candidate, sensitive, or special status species. Therefore, the Project would have no substantial adverse effects on candidate, sensitive, or special status species. This impact will also be clearly insignificant and unlikely to occur.

Riparian Habitat or Federally Protected Wetlands

No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area. Therefore, the Project will not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact to riparian habitat or other sensitive natural community will occur. This impact will also be clearly insignificant and unlikely to occur.

Federally Protected Wetlands

No Federally Protected wetlands exists on the Project Site or in the immediate surrounding area. Therefore, the Project will not have a substantial adverse effect. This impact will also be clearly insignificant and unlikely to occur.

Movement of Native Resident, Migratory Fish or Wildlife Species

No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the project site or in the immediate vicinity of the Project Site. Therefore, the Project would not have an adverse effect on federally protected wetlands. This impact will also be clearly insignificant and unlikely to occur.

Local Policies or Ordinances Protecting Biological Resources

No locally protected biological resources, such as oak trees or California walnut woodlands, or other trees protected under the City of Los Angeles Protected Tree Ordinance exist on the Project Site. The Project would be required to replace any significant, non-protected trees through the City's review and permitting process. Therefore, the Project would not conflict with local policies or ordinances protecting biological resources, and impacts are less than significant. This impact will also be clearly insignificant and unlikely to occur.

Adopted Habitat Conservation Plans

The Project Site is not located within a habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan. Therefore, the Project would not conflict with the provisions of any adopted conservation plan, and no impact would occur. This impact will also be clearly insignificant and unlikely to occur.

Cultural Resources

Historic Resources

The Project Site is located within an urbanized area of the City of Los Angeles and has been subject to grading and development in the past. The Project Site contains one altered commercial building, 1248 S. Figueroa Street, constructed in 1919 to house a Studebaker automotive dealership. Following investigations of the Project Site, the architectural historians concluded based on substantial evidence that the commercial building is not individually eligible as a historical resource at the federal, State, or local levels under the following historical theme: Commercial Development and the Automobile (1910-1980). Because the building does not qualify as a historical resource under CEQA, Project implementation, which would involve demolition of the building, would have no direct impact on historical resources on the Project Site,

Indirect impacts were analyzed to determine if the Project would result in a substantial material change to the integrity and significance of historical resources or their contributing setting within the Project vicinity. Within a quarter-mile radius of the Project Site, there are fourteen potential historical resources identified by Survey. These fourteen historical resources are approximately 0.11 to 0.19 miles away from the Project Site and therefore do not have direct views of the Project Site. Furthermore, there are no historical resources immediately adjacent or across the street from the Project Site. Therefore, the Project would have no indirect impacts on known or potential historical resources in the Project vicinity.

Therefore, pursuant to CEQA, the proposed redevelopment of the Project Site would not result in a significant adverse impact on historical resources. This impact will also be clearly insignificant and unlikely to occur.

Human Remains

As previously indicated, the Project Site has been previously graded and developed. Nonetheless, the Project Site would require excavation that would extend into native soils. Thus, the potential exists to encounter human remains during excavation activities. A number of regulatory provisions address the handling of human remains inadvertently uncovered during excavation activities. These include State Health and Safety Code Section 7050.5, Public Resources Code 5097.98, and CEQA Guidelines Section 15064.5(e). Thus, in the event that previously unknown human remains are encountered during construction excavations, compliance with these regulations would ensure that impacts would be reduced to a less than significant level. This impact will also be clearly insignificant and unlikely to occur.

Geology and Soils

Fault Rupture

The Project Site is not within a mapped Alquist-Priolo Earthquake Fault Zone, any fault zones mapped by the City's General Plan Safety Element, or any other mapped fault zones with surface rupture potential. The potential for surface fault rupture at the Project Site is very low. The Project Site is within the projection of the Puente Hills Blind Thrust (PHB), which is buried deep below the surface extending from Downtown Los Angeles to the City of Brea. The nearest subsurface rupture potential for the PHBT is between 5 and 13 kilometers below grade in the vicinity of the Project Site. However, the PHBT does not represent a risk of surface rupture on the Project Site. The Project would not expose people or structures to substantial adverse effects, including the risk of loss, injury, or death involving the rupture of a known earthquake

fault or exacerbate existing environmental conditions. As such, impacts related to fault rupture would be less than significant.

Seismic Ground Shaking

A site-specific preliminary geotechnical investigation was conducted at the Project Site to evaluate the soils, potential levels of ground shaking that could occur, and determine that development on the Project Site was feasible. The Geotechnical Report concluded that seismic conditions on the Project Site can be overcome with engineering design solutions, standard engineering approaches, and conformance with current building codes. Conformance with existing regulatory compliance measures that require final design level geotechnical engineering approvals before issuance of grading and building permits would reduce any potential impacts to a less than significant level.

PDF GEO-1 requires a qualified geotechnical engineer to be present on the Project Site during excavation, grading, and general Project Site preparation activities to monitor implementation of the recommendations specified in the geotechnical reports. Therefore, with adherence to all applicable regulatory requirements, in conjunction with PDF GEO-1, the Project would not expose people or structures to substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking or exacerbate existing environmental conditions. Impacts would be would be less than significant.

Seismic-Related Ground Failure Including Liquefaction

The Project Site is relatively flat and the surrounding area is developed such that the potential for lateral spreading is low. While the Project Site is subject to potentially strong seismic ground shaking, and while some clayey soils occur at depth (between approximately 30 and 130 feet bgs), the California Geological Survey (CGS) documents historic-high groundwater levels in the area as being 100 feet bgs. Substantial amounts of groundwater were not encountered in the borings carried out for the preliminary geotechnical investigation at the Project Site that were advanced to a maximum depth of 130 feet bgs. Therefore, according to the Geotechnical Report findings, and other reliable sources, the potential for liquefaction and associated ground deformation (e.g., lateral spreading) at the Project Site is considered low. As such, impacts related to liquefaction would be less than significant.

Landslides

The Project Site is not located within a City-designated Hillside Grading Area, is not subject to the City's Hillside Ordinance, and is not located in a City-designated Landslide area. Additionally, the Project Site is located in the South Park district of Downtown Los Angeles, which is relatively flat. Further, the Project Site is not in close proximity to any mountains or steep slopes. As such, there is no potential for landslides to occur on or near the Project Site. Therefore, the Project would not expose people or structures to potential substantial adverse effects involving landslides and no impact would result. This impact will also be clearly insignificant and unlikely to occur.

Soil Erosion or Loss of Topsoil

Construction activities would include ground-disturbing activities (e.g., excavation, grading, soil stockpiling, foundation construction, the installation of utilities) that would temporarily expose soils, allowing for possible erosion if not managed appropriately. However, all grading activities would require grading permits from LADBS, which would include requirements and standards designed to limit potential impacts associated with erosion. Finally, once construction activities are completed, the Project Site would be covered in impervious surfaces, landscaping, and

completed with drainage control measures that would reduce the potential for erosion. Once constructed, the proposed development would include drainage control features in accordance with local and regional requirements to ensure that stormwater is managed in a way that minimizes the potential for erosion or sedimentation. Therefore, with adherence to applicable regulations, substantial soil erosion or the loss of topsoil during Project construction and operation would not occur. In addition, the Project would not cause or accelerate natural processes of wind and water erosion. Impacts would be less than significant.

Lateral Spreading, Subsidence, Liquefaction, Collapse

The Project would not be located on a geologic unit or soil that is unstable, or that would become unstable, and the Project would not result in any on- or off-site lateral spreading, subsidence, liquefaction or collapse caused in whole or in part by exacerbation of the existing environmental conditions. Impacts during Project construction or operation would be less than significant.

Expansive Soils

The soils encountered on the Project Site, sandy soils with relatively low clay content, have a low expansion potential. The Geotechnical Report classified the underlying soils as primarily sandy alluvial materials and where silts and clays were observed, they were classified as "lean," indicating a relatively low potential for expansion. As part of the construction of the proposed subterranean level and foundations, the upper materials, primarily artificial fills, would be removed by excavation. Any new fill that would be brought onto the Project Site would be required to meet fill requirements that include standards for expansive properties. Therefore, the Project would not be located on expansive soils or create substantial risks to life or property caused in whole or in part by exacerbation of the existing soil conditions.

Septic Tanks

The Project Site is located in an urbanized area where wastewater infrastructure is currently in place. The Project would connect to existing infrastructure and would not use septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur. This impact will also be clearly insignificant and unlikely to occur.

Cumulative

Generally, the geographic context for cumulative analysis of potential geology and soils impacts encompasses the greater Los Angeles Basin because the Los Angeles Basin is subject to similar seismic activity and related hazards. Seismic hazards can vary widely within the Los Angeles Basin as underlying conditions and proximity to an earthquake can present different levels of susceptibility to damage and injury to occupants. Development at the Project Site and elsewhere in the region could expose additional people and structures to potentially adverse effects associated with earthquakes including seismic ground shaking. Site-specific geotechnical studies required by local agencies in accordance with current building code standards would determine how future development projects must be designed to minimize the risk of loss, injury, or death involving earthquakes. Building code standards are based on the latest developments in seismic design and are routinely updated to include the best available science. Therefore, current and future development would be constructed in accordance with the most advanced seismic design standards.

More specifically, there are two projects in close proximity to the Project Site that are analyzed for potential cumulative effects. One, the Circa project at 1200 S. Figueroa Street, is immediately north of the Project Site and shares a property line. The Geotechnical Report

concluded that the construction of the Project (including all grading and excavation activities) would have no adverse effect on the geologic stability of properties outside of the Project Site. The second nearby project, a 56-story hotel high-rise, is proposed, but not yet approved or under construction, south of the Project Site and across W. Pico Boulevard on the site of the existing City Lights at Fig multi-family residential development. The excavations for the Project would be separated from any eventual excavation at the City Lights at Fig by W. Pico Boulevard. Thus, there would be no potential for combined incremental geology and soils impacts between these two projects.

Adherence to Geotechnical Report recommendations, in conjunction with applicable building code compliance during grading, excavation, and construction of the Project (including recommendations pertaining to construction shoring of excavation sites and the design of permanent retaining walls and below-grade walls to account for the foundations of adjacent buildings) would ensure stability of the Project Site and any nearby related project. The Geotechnical Report also recommends surveying adjacent buildings and streets for horizontal and vertical locations as well as surveying, photographing, and documenting cracks and offsets in those buildings and streets. Project construction and operation would not have individual or combined adverse effects on the geologic stability of any nearby related projects.

Therefore, the Project would not have a cumulatively considerable geology and soils impact when viewed in connection with the potential effects of the related projects. Impacts are less than significant.

Project Design Features

PDF GEO-1: A qualified geotechnical engineer shall be present on the Project Site during excavation, grading, and general Project Site preparation activities to monitor implementation of the recommendations specified in the geotechnical reports.

Conclusion

Impacts related to geology and soils were determined to be less than significant because adherence to regulatory requirements (including review and approval of the Final Geotechnical Report) and applicable building codes and PDF-GEO-1 would adequately reduce potential geotechnical impacts. Therefore, no mitigation measures are required.

Greenhouse Gas Emissions

Greenhouse Gas Emissions Generation and Plan Consistency

The Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. The Project's consistency with applicable regulatory plans and policies to reduce GHG emissions demonstrates that the Project would substantially comply with or exceed the GHG reduction actions and strategies outlined in CARB's Climate Change Scoping Plan, SCAG's 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the LA Green Plan, Sustainable City pLAn and Green Building Code.

The Project would be consistent with the applicable strategies outlined in CARB's Climate Change Scoping Plan, in particular with strategies to improve energy and water efficiency, reduction of solid waste, and mobile source efficiency by locating the Project at in infill location with close proximity to high-quality transit and complimentary off-site commercial, retail, and restaurant land uses. SCAG's 2016 RTP/SCS is designed to demonstrate reductions in vehicle miles traveled (VMT) within the region in accordance with per capita VMT reductions established by CARB. The Project would incorporate characteristics that would achieve

reductions in VMT based on substantial evidence according to VMT reduction guidelines from California Air Pollution Control Officers Association's (CAPCOA) guidance document, Quantifying Greenhouse Gas Mitigation Measures, which provides emission reduction calculation formulas for transportation characteristics and measures, and city data for the Central City Community Plan Area that demonstrates that the Project would be sited in a location that is well served by multi-modal transportation choices. As such, the Project would be consistent with regional plans to reduce VMT and associated GHG emissions. The Project would also be consistent with the City's LA Green Plan, Sustainable City pLAn, and Green Building Ordinance by complying with and incorporating energy efficient designs, water conservation measures, and waste reduction measures. The Project's consistency with these applicable regulatory plans and policies to reduce GHG emissions, along with implementation of PDF AQ-1 and AQ-2 and mitigation measures discussed in other sections of the Draft EIR, particularly MM-TRAF-1 (Traffic Demand Management Program) would minimize the Project's GHG emissions and render GHG impacts less than significant.

Cumulative

In the case of global climate change, a cumulative impact analysis differs from other environmental issues areas. The proximity of the Project to other related projects or other GHG emission generating activities is not directly relevant to the determination of a cumulative impact because climate change is a global condition. According to CAPCOA, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective." Moreover, although the State requires MPOs and other planning agencies to consider how region-wide planning decisions can impact global climate change, there is currently no established non-speculative method to assess the cumulative impact of proposed independent private-party development projects.

The State CEQA Guidelines specify that compliance with a GHG emissions reduction program renders a cumulative impact insignificant. Per State CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.

As discussed above, the Project would be consistent with applicable GHG emissions reduction plans and policies discussed within CARB's Climate Change Scoping Plan, SCAG's 2016 RTP/SCS, and the City's LA Green Plan, Sustainable City pLAn, and Green Building Code. As a result, the Project would be consistent with the State's goals and result in a GHG emissions profile that is consistent with State GHG reduction plans. In accordance with CEQA requirements, related projects would be required to demonstrate consistency with applicable GHG emissions reduction plans and policies and provide appropriate mitigation in accordance with CEQA requirements to mitigate significant impacts. The Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted numerical significance thresholds, and given this consistency, it is concluded that the Project's impacts are not cumulatively considerable.

Project Design Features

PDF AQ-1: Green Building Measures: The Project shall be designed and operated to include energy and resource efficient features that exceed regulatory requirements, which shall include the following:

- The Project shall include easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials such as paper, corrugated cardboard, glass, plastics,

metals, and landscaping debris (trimmings).

- The Project shall install energy efficient appliances that meet the 2017 ENERGY STAR® rating standards or equivalent for both hotel and restaurant land uses.
- The Project shall include efficient heating, ventilation, and air conditioning (HVAC) systems (2017 ENERGY STAR® rating standards or equivalent).
- The parking structure shall be designed with occupancy-sensor controlled lighting that places lighting fixtures in a low power state in unoccupied zones.
- To encourage carpooling and the use of electric vehicles by Project employees, guests, and visitors, the Project shall designate a minimum of 5 percent of on-site parking for carpool and/or alternative-fueled vehicles, and the Project design shall provide for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into 10 percent of the parking spaces.

PDF AQ-2: Construction Features: Construction equipment operating at the Project Site will be subject to a number of requirements. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. Construction measures shall include the following:

- The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 interim off-road emissions standards for equipment rated at 50 horsepower (hp) or greater during Project construction. All equipment shall be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filter or equivalent. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.
- Equipment such as tower cranes and welders shall be electric or alternative fueled (i.e., non-diesel). Pole power shall be made available for use with electric tools, equipment, lighting, etc.
- Alternative-fueled generators shall be used when commercial models that have the power supply requirements to meet the construction needs of the Project are readily available from local suppliers/vendors.
- All on-road heavy-duty diesel trucks with a gross vehicle weight rating of 19,500 pounds or greater used at the Project Site shall be engine model year 2012 or later or shall comply with the USEPA 2007 on-road emissions standards.

PDF TRAF-1: Construction Management Plan: A detailed Construction Management Plan shall be submitted to the City's Department of Transportation (LADOT) for review and approval prior to the start of any construction work. The Construction Management Plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. The Construction Management Plan shall formalize how construction shall be carried out and identify specific actions that shall be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following mandatory elements:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities

adjacent to Figueroa Street, Flower Street, and Pico Boulevard, to ensure traffic safety on public rights of way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's Figueroa Street, Flower Street and Pico Boulevard driveways.

- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Sequencing construction activity to reduce the amount of construction-related traffic on arterial streets.
- Contain construction activity within the Project Site boundaries.
- Coordination with LADOT to address any overlapping of construction with the MyFigueroa project.
- Coordination with Metro to address any construction near the railroad right of way.
- Safety precautions for pedestrians and bicyclists through alternate routing and protection barriers/fencing that shall be implemented.
- Scheduling of construction-related deliveries and haul trips so as to occur outside the commuter peak hours.

Conclusion

With the implementation of PDFs AQ-1, AQ -2, and TRAF-1, Project and cumulative impacts related to greenhouse gas emissions are less than significant and no mitigation measures are required.

Hazards and Hazardous Materials

Routine Transport, Use or Disposal of Hazardous Materials

Construction

Construction activities required for the Project would involve trenching, excavation, grading, and other ground-disturbing activities. The construction activities would temporarily require the use of equipment and would use potentially hazardous materials such as fuels, lubricants, glues, solvents, paints, thinners, or other chemicals. Such materials would be used only in quantities typically associated with the construction of a commercial development and would be transported, handled, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Construction in conformance with standard regulatory compliance measures is adequate to reduce the potential risk hazards associated with construction activities. Accordingly, the Project would not increase the probable frequency or severity of consequences to people or property from the potential exposure to hazardous substances. Therefore, construction of the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

Operation

Operations of the Project would consist of typical and common activities associated with operation of mixed-use hotel with commercial uses and associated amenities such as recreational pool and viewing decks, fitness facilities, open spaces, and retail and restaurants.

No hazardous materials would be utilized during day-to-day operation of the Project other than typical housekeeping, restaurant, vehicle, pool, and landscape maintenance materials such as cleaning supplies, paints, oil, grease, pesticides, herbicides, water disinfectants, fertilizers. The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for transport, use, storage, and disposal. Compliance with these standard practices avoids substantial exposure hazards. There would be low frequency and minimal severity of consequences on people or property from exposure to the limited and commonplace materials used to operate the Project. Accordingly, there is limited potential of the Project to create health hazards from these non-hazardous sources. Therefore, operation of the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

Reasonably Foreseeable Upset and Accident Conditions Involving the Release of Hazardous Materials in the Environment

Construction – ACM and LBP

Portions of the Project Site sampled did not contain asbestos-containing materials (ACMs) or the presences of lead-based paint (LBP) at levels beyond applicable testing thresholds. The lack of ACMs and LPBs on the Project Site, in conjunction with standard regulatory compliance during construction would reduce the probable frequency and severity of consequences to people or property from the accidental release of these materials. Therefore, potential impacts from reasonably foreseeable upset or accident conditions involving the release of such hazardous materials would be less than significant and no mitigation measures would be required.

Operation

Operations of the Project would consist of the typical and common activities associated with operation of a mixed-use hotel with commercial uses and associated amenities such as recreational pool and viewing decks, fitness facilities, open spaces, and retail and restaurants. No hazardous materials would be utilized during day-to-day operation of the Project other than typical housekeeping, restaurant, vehicle, pool, and landscape maintenance materials such as cleaning supplies, paints, oil, grease, pesticides, herbicides, water disinfectants, fertilizers. The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for transport, use, storage, and disposal of such products. Compliance with these standard practices avoids substantial exposure hazards. There would be low frequency and minimal severity of consequences on people or property from exposure to the limited and commonplace materials used to operate the Project. Accordingly, there is limited potential of the Project to create health hazards from these non-hazardous sources. Therefore, operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

During the subsurface methane investigation performed for the Project Site between January 10 and January 18, 2017 by Amec Foster Wheeler, resulting in a requirement for a "Level I" site design methane mitigation system. All new buildings and paved areas located in a Methane Zone are required to comply with the Los Angeles Building Code, Division 71, and the "Minimum Methane Mitigation Requirements" established by the LADBS, which define installation procedures, design parameters, and test protocols for a methane mitigation system. Compliance with LADBS "Minimum Methane Mitigation Requirements" would reduce the risk from methane intrusion to employees and visitors, and Project design would comply with the Level I site design requirements. Therefore, operation of the Project would not result in a

significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of methane.

Hazardous Emissions or Materials within One-Quarter Mile of a School

There are no existing or proposed schools located within one-quarter mile of the Project Site. Construction and operation of the Project would not result in significant hazardous emissions or materials. As such, it is concluded that the Project would result in no impacts related to hazardous materials at any existing or proposed schools within a one-quarter mile radius of the Project Site. This impact will also be clearly insignificant and unlikely to occur.

List of Hazardous Materials Sites under Government Code Section 65962.5

The Project Site is not considered a hazardous materials site. The Phase I ESA and Phase II ESA concluded that there are certain sites on the Cortese list (complied pursuant to Government Code Section 65962.5) that are within the vicinity of the Project Site, but the Project Site is not currently on that list. Furthermore, the Phase I ESA and II ESA evaluated whether prior operations have contaminated the subsurface of the Project Site, to determine whether soil to be excavated during the planned redevelopment may require special handling, and to determine whether redevelopment of the Project Site could create a significant hazard to the public or environment. Based on the results of these investigations, the historical site have not resulted in a significant threat to human health. Therefore, the Project would not be located on a site which is included on a list of hazardous materials sites and would not, as a result, create a significant hazard to the public or the environment. Impacts are less than significant.

Public and Private Airport Safety Hazards

The Project Site is not within an airport land use plan and it is not within two miles of a public use airport or private air strip. As a result, the Project would not result in a safety hazard to people residing or working within an airport land use plan or within two miles of an airport, and no impact would result. This impact will also be clearly insignificant and unlikely to occur.

Impair Implementation or Interfere with an Adopted Emergency Response Plan or Emergency Evacuation Plan

The Project Site is located in an established urban area that is well served by the surrounding roadway network. Figueroa Street adjacent to the Project Site, as well as the nearby Harbor (US-110) and Santa Monica (I-10) Freeways are designated Selected Disaster Routes by the City. While it is expected that the majority of construction activities for the Project would be confined on-site, short-term construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. In these instances, the Project would implement traffic control measures (e.g., construction flagmen, signage, etc.) to maintain flow and access. Furthermore, in accordance with City requirements, the Project would develop a Construction Management Plan (PDF TRAF-1), which includes designation of a haul route, to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access. In addition, operation of the Project would generate traffic in the Project vicinity and would result in some modifications to access from the streets that surround the Project Site. Nonetheless, the Project is required to provide adequate emergency access and to comply with Los Angeles Fire Department (LAFD) access requirements. Subject to review and approval of site access and circulation plans by the LAFD, the Project would not impair implementation or physically interfere with adopted emergency response or emergency evacuation plans. Since the Project would not cause an impediment along the City's designated emergency evacuation route, nor would the proposed hotel and commercial uses impair the implementation of the City's emergency response plan,

the Project would have a less than significant impact with respect to these issues. This impact will also be clearly insignificant and unlikely to occur.

Wildland Fires

The Project Site is located in the highly urbanized downtown area of Los Angeles. No wildlands are present on the Project Site or surrounding area. Therefore, the Project would not expose people or structures to a significant risk involving wildland fires. This impact will also be clearly insignificant and unlikely to occur.

Cumulative Impacts

The Project would not individually result in significant impacts regarding hazards or hazardous materials. The Project would adhere to applicable regulatory requirements, incorporate project design features, and provides mitigation measures for site-specific soil conditions related to the inadvertent discovery of hazards and hazardous materials during excavation activities. Potentially hazardous materials used during the construction and operation of the Project would be used in quantities typical of the scale and commercial nature of the Project and would be handled, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' specifications. The Phase II ESA did not report subsurface contamination in the areas assessed and voluntary mitigations MM-HAZ-1 and MM-HAZ-2 ensure that any unknown contamination encountered during construction would be adequately handled. No LBP was detected on the Project Site and demolition activities would comply with OSHA's Lead Exposure in Construction Rule. The Project would also comply with LADBS methane requirements. Accordingly, the Project would not individually contribute to an adverse impact related to hazards or hazardous materials.

Generally, the geographic context for cumulative impact analysis of hazards includes the related projects in the vicinity of the Project, that when viewed together with the Project, could incrementally increase a hazards impact to a significant level. As described above, the Phase I ESA identified potentially hazardous conditions located between 0.25- to 1-mile around the Project Site. It concluded that based on distance, topography, gradients, current regulatory status, and the absence of reported releases, none of the sites surrounding the Project Site represent a likely past, present, or material threat of release that could adversely affect the Project Site.

Construction and operation of the related projects can reasonably be expected to involve the limited use of potentially hazardous materials typical of those used in residential and commercial developments, and each related project would be subject to applicable laws and regulations and manufacturers' specifications to ensure the safe transport, storage, handling, and disposal of such materials. This further reduces potential cumulative hazard impacts.

A few related projects adjoin the Project Site or are separated by a single street. These projects are either under construction or planned for development and include: (1) the Circa project to the north; (2) the City Lights on Fig project to the south; and (3) the Los Angeles Convention Center Expansion and Modernization Project to the west. These related projects would not create a significant hazard to the public or environment because the potentially hazardous materials typically used in such residential and commercial mixed-use developments are limited to relatively small volumes and are commonplace materials. In addition, each of these developments must comply with its site-specific development standards and state hazardous materials handling and transporting regulations. These projects together with the Project do not create a cumulatively considerable significant impact.

Therefore, the Project would not have a cumulatively considerable hazards or hazards materials impact when viewed together with the potential effects of the related projects. Cumulative impacts are less than significant.

Hydrology and Water Quality

Violate Water Quality Standards or Waste Discharge Requirements or Otherwise Degrade Water Quality

Stormwater Runoff

Construction activities could contribute to pollutant loading in stormwater runoff and thereby impact water quality standards. However, construction contractors disturbing greater than 1 acre of soil would be required to obtain coverage under the NPDES General Construction Activity Permit (order No. 2012-0006-DWQ). In accordance with the requirements of the permit, the Project Applicants would prepare and implement a site-specific Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association BMP Handbook. With the implementation of site-specific BMPs included as part of the SWPPP, the Project would reduce or eliminate the discharge of potential pollutants from the stormwater runoff. In addition, the Project would be required to comply with City grading permit regulations. Therefore, temporary construction-related impacts on surface water quality would be less than significant.

Additionally, there are currently no existing on-site BMPs, stormwater run-off during post-Project conditions would result in improved surface water quality conditions during operation of the Project. Thus, operation of the Project would not result in discharges that would alter the quality to a degree which unreasonably affects beneficial uses of the waters or creates a hazard to the public health. Therefore, the construction and operational impacts of the Project on surface water quality would be less than significant.

Groundwater Quality

Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, would reduce the potential for the construction and operation of the Project to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing groundwater production well. The Project would also comply with mandatory SWPPP measures and implement appropriate BMPs during construction and operation to reduce discharge potential to any groundwater sources.

Deplete Groundwater Supplies or Interfere with Groundwater Recharge

The Project does not propose groundwater withdrawal and, with respect to groundwater recharge, would replace one set of impervious surfaces (i.e., commercial uses and associated parking areas) with another (i.e., mixed-use hotel towers). Thus, impacts to groundwater recharge on the Project Site would be less than significant. No mitigation measures are required. This impact will also be clearly insignificant and unlikely to occur.

Permanently or Substantially Alter the Existing Drainage Pattern of the Site

Construction activities are the primary activities that could contribute to erosion or siltation when soils are exposed during development of the Project Site. Once the Project is operational, the Project Site will be impervious and erosion and siltation would not occur. Construction activities would have the potential to temporarily alter existing drainage patterns and flows within the Project Site by exposing the underlying soils and making the Project Site temporarily more

permeable. However, the Project would be required to obtain coverage under the NPDES General Construction stormwater permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. BMPs would be designed to reduce runoff and pollutant levels in runoff during construction.

Therefore, the Project would not substantially alter the existing drainage patterns of the Project Site or area, including through alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site. Impacts would be less than significant.

Alter the Existing Drainage Pattern of the Site or Substantially Increase the Rate or Amount of Surface Runoff in a Manner that would Result in Flooding On or Off-Site

The Project would not substantially alter the existing drainage patterns of the Project Site or area. Compliance with the LID requirements for the Project Site would ensure stormwater treatment with post-construction BMPs per the City's Stormwater Program. Therefore, Project would not substantially alter the existing drainage pattern of the Project Site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Impacts would be less than significant.

Create or Contribute Runoff Water Which Would Exceed the Capacity of Existing or Planned Stormwater Drainage Systems

The Project would not create runoff that would exceed the capacity of existing or planned drainage systems because the current drainage infrastructure is sufficient to handle existing and post-project peak flows, and would not require construction of new stormwater drainage facilities or expansion of existing facilities because there is no material change in pre- and post-project stormwater runoff volumes or flow rates. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant.

Degrade Water Quality

The Project would implement a site-specific SWPPP adhering to the California Stormwater Quality Association BMP Handbook. In addition, the Project would implement infiltration for stormwater runoff in accordance with current LID requirements, and generally improve the water quality conditions during operation of the Project. Finally, Project does not propose any activities or land uses that would otherwise create water quality pollutants that are atypical of most urban existing uses and proposed developments. Therefore, the Project would not otherwise substantially degrade water quality. Impacts would be less than significant.

Housing or Structures within a 100-year Flood Plain

The Project Site is not located within a flood zone, including the 100-year flood zone designated by the Federal Emergency Management Agency (FEMA). Thus, no flood zone impacts would occur and no mitigation measures would be required. This impact will also be clearly insignificant and unlikely to occur.

Levee or Dam

The Project Site is not located within a designated floodplain. Further, the Project Site is not located with a potential inundation area. Additionally, there are no levees or dams in the Project vicinity. Therefore, no impact associated with flooding, including flooding due to the failure of a levee or dam, would occur. This impact will also be clearly insignificant and unlikely to occur.

Inundation by Seiche, Tsunami, or Mudflow

With respect to tsunami hazards, the Project Site would not be subject to a tsunami, and is not located in a City-designated tsunami hazard area. The Project Site is located in an area of relatively flat topography and urban development, with no enclosed bodies of water nearby, and as such, there is no potential for inundation resulting from a seiche or mudflows. Therefore, no impacts would occur due to inundation by tsunami or mudflow. This impact will also be clearly insignificant and unlikely to occur.

Cumulative

In accordance with City requirements, related projects and other future development projects would be required to implement BMPs to manage stormwater in accordance with LID guidelines. Furthermore, the City Department of Public Works would review each future development project on a case-by-case basis to ensure sufficient local and regional infrastructure is available to accommodate stormwater runoff. Construction and operation of future projects would be subject to NPDES requirements for water quality and Los Angeles Regional Water Quality Control Board (LARWQCB) requirements governing groundwater quality. As such, the Project's contribution to cumulatively significant impacts on surface water hydrology, surface water quality or groundwater quality, considered together with the related projects, would be less than significant.

Land Use and Planning

Physically Divide an Established Community

The Project Site is located within the boundaries of the Central City Community Plan, in the highly urbanized South Park district of Los Angeles. The Project vicinity is generally built out with a variety of entertainment, residential, and commercial uses, as well as surface parking. Development is generally dense, with mid- to high-rise structures typifying nearby development. The Project would represent infill development and would introduce new hotel and commercial uses to the Project Site similar to adjacent and nearby land uses. Therefore, the Project would not physically divide an established community and related impacts would be less than significant. This impact will also be clearly insignificant and unlikely to occur.

Consistency with Applicable Plans and Policies

The Project would develop a 42-story hotel tower and a 25-story hotel tower, ground-floor retail/restaurant uses, and streetscape improvements including landscaping, enhanced sidewalks, street lighting, decorative paving, and public seating. The Project also includes a Sign District on the Project Site and surrounding parcels. The Sign District would permit signage that is generally consistent with the extensive signage in the LASED, enhance the aesthetic character along Figueroa Street and Pico Boulevard, and create visual continuity within the South Park district.

The Project would increase the intensity of development on the Project Site, but would be compatible in scale and height with the adjacent developments and uses. The Project would

also be compatible with applicable plans and policies, including SCAG 2016 RTP/SCS, General Plan Framework, Health and Wellness Element (Plan for a Healthy Los Angeles), Do Real Planning, Walkability Checklist, Central City Community Plan, Redevelopment Plan for the City Center Redevelopment Project Area, 2010 Bicycle Plan and Mobility Plan 2035, and MyFigueroa Project. Therefore, impacts related to land use compatibility would be less than significant.

Conflict with Habitat Conservation Plans

The Project Site is located in the highly urbanized downtown area of Los Angeles and is developed with a two-story commercial building and surface parking. The Project Site is not located within a habitat conservation plan or natural community conservation plan. Therefore, the Project would not conflict with the provisions of any adopted applicable conservation plan. This impact will also be clearly insignificant and unlikely to occur.

Cumulative

The related projects, in conjunction with the Project, would provide needed housing, hotel rooms, and jobs in the downtown area near existing entertainment venues; provide amenities to visitors, residents, and workers; concentrate development near transit; activate the downtown area; and support the Convention Center, LA LIVE, and existing businesses. These projects are consistent with the high–rise, high-density development identified in the Framework Element, Community Plan, and City Center Redevelopment Plan. As such, the high-density mixed-use residential, retail, and hotel development would be consistent with the general intent of these plans to provide additional housing, hotel rooms, and job opportunities; intensify development near public transit and job centers; and encourage and active 24-hour environment in the downtown area. The Project and the related projects combined would be consistent with the overall intent of the applicable land use plans and would not preclude the attainment of primary land use goals in the South Park or downtown area. Therefore, the Project would not result in a cumulatively considerable significant impact regarding land use consistency and compatibility. Impacts are less than significant.

Mineral Resources

The Project Site is not classified by the City of Los Angeles as containing significant mineral deposits. Furthermore, the Project Site is not designated as an existing mineral resource extraction area by the State of California or the U.S. Geological Survey. Although the Project Site is within a City-designated Oil Drilling District, that designation merely identifies districts where the drilling of oil wells or the production from the wells of oil, gases or other hydrocarbon substances is permitted (it does not apply to subterranean gas holding areas are operated as a public utility). There are no active wells or drilling on the Project Site and none are proposed as part of the Project; moreover, Project implementation would not impede such activities elsewhere in the Project area. Project implementation would not result in the loss of availability of a known mineral resource of value to the region and residents of the State, nor of a locally important mineral resource recovery site. No impacts to mineral resources would occur. This impact will also be clearly insignificant and unlikely to occur.

Noise

Noise in Excess of Applicable Standards – Off-Site Construction Activity and Related Noise

Construction truck trips would occur throughout the construction period. Haul trucks would travel on approved truck routes designated within the City. Given the Project Site's proximity to SR-

110 and I-10, haul truck traffic would take the most direct route to the appropriate freeway ramps. The addition of the estimated haul trucks and worker vehicles per day along these routes would result in a negligible noise level increase and would not increase noise levels by 5 dBA CNEL over the ambient condition. Therefore, noise impacts from off-site construction traffic would not expose persons to noise levels in excess of standards established by the City and would be less than significant. No mitigation measures are required.

Noise in Excess of Applicable Standards – Operational Noise

For operational noise, the threshold of significance used for on-site operations is an increase in ambient noise level of 5 dBA L_{eq} at an adjacent property line. The EIR found the following impacts less than significant on an individual basis while the composite operational uses are less than significant with mitigation measures incorporated, as discussed in detail in the Sections below.

Open Space - Hotel A/B Tower's 36th Floor Landscaped Viewing Deck

A portion of Hotel A/B Tower's 36th floor would contain an open-air landscaped viewing deck. The nearest residential uses are the multi-family residences at City Lights on Fig (receptor R7), approximately 120 feet south of the Project Site. The multi-family residences at City Lights on Fig are located in a five-story building, and as such would not be directly across from the Hotel A/B Tower's 36th floor. The landscaped viewing deck noise would be reduced to 43.6 dBA at the nearest noise sensitive receptor (R7), which is below the significance thresholds of 76.9 dBA (daytime noise level of 71.9 dBA at R7 in Table 4.8-1 of the Draft EIR plus 5 dBA).

The viewing deck would include ambient music. With speakers set at approximately 10 dBA over the noise level from visitors, ambient music noise would be approximately 53.6 dBA at the nearest noise sensitive receptor (R7). The combined noise level would be approximately 54.0 dBA, which is below the significance threshold of 76.9 dBA (daytime noise level of 71.9 dBA at R7 in Table 4.8-1 plus 5 dBA). As such, the impacts of noise associated with the use of common outdoor open spaces on the landscaped viewing deck, as experienced at the nearest sensitive receptor (R7), would not expose persons to noise levels in excess of City standards. Impacts would be less than significant and no mitigation would be required.

Open Space - Hotel C Tower's 24th Floor Rooftop Pool Deck

The Hotel C Tower would contain a roof deck containing a pool lounging area, cabanas, and various movable furniture for casual seating on the 24th floor. The Hotel C Tower's 24th floor rooftop pool deck would include light music and entertainment and would be programmed as a less active and more casual space compared to Hotel A/B Tower's 8th floor landscaped pool deck and 41st floor rooftop pool deck. The nearest noise-sensitive residential uses are receptor R5, the Circa project currently under construction and located approximately 25 feet north of the Project Site. However, the Hotel C Tower itself would block the line-of-sight between the Hotel C Tower's rooftop pool deck and the receptor R5. As a result, there would be no perceptible increases in noise from the Hotel C Tower's rooftop pool deck at the receptor R5.

The next nearest noise-sensitive uses are the multi-family residential uses across W. Pico Boulevard (receptor R7, City Lights on Fig Apartments), located approximately 120 feet to the south of the Project Site. The roof deck noise would be reduced to 44.7 dBA at the noise sensitive receptors (City Lights on Fig Apartments), R7 to the south, which is below the significance threshold of 76.9 dBA (daytime noise level of 71.9 dBA at R7 in Table 4.8-1 of the Draft EIR plus 5 dBA).

The Hotel C Tower rooftop pool deck would include light music and entertainment and would be programmed as a less active and more casual space compared to Hotel A/B Tower's 8th floor landscaped pool deck and 41st floor rooftop pool deck. The combined noise level would be approximately 55.1 dBA, which is below the significance threshold which is below the daytime significance threshold of 76.9 dBA (daytime noise level of 71.9 dBA at R7 plus 5 dBA) and nighttime significance threshold of 69.6 dBA (nighttime noise level of 64.6 dBA from 10:00 P.M. to 2:00 A.M. plus 5 dBA). Furthermore, at this location, given the height of the 24th level, the noise from the rooftop pool deck would not substantially combine with the ground-level or near-ground level on-site Project noise sources and would not substantially contribute to Project composite noise sources.

Traffic – Existing and Future

The maximum increase in Project-related traffic noise levels over existing traffic noise levels would be 0.4 dBA CNEL, which would occur along W. Pico Boulevard between S. Figueroa Street and S. Flower Street adjacent to residential and commercial uses. The maximum increase in Project-related traffic noise levels over the future traffic noise levels would be 0.3 dBA CNEL, which would occur along S. Flower Street, between W. Pico Boulevard and W. Venice Boulevard adjacent to residential and commercial uses. These increases in sound level would be well below the most stringent significance threshold of 3 dBA CNEL increase over ambient noise levels. Accordingly, the Project-related noise increases would be less than the applicable thresholds. Therefore, operation of the Project would not result in off-site traffic-related noise impacts in excess of City standards and impacts would be less than significant.

Fixed Mechanical Equipment

As part of the Project, new mechanical equipment would be located on rooftops or within buildings, and would be shielded from nearby land uses to attenuate noise and avoid conflicts with adjacent uses. Operation of mechanical equipment would not exceed the City's thresholds of significance of a 5 dBA L_{eq} increase at an adjacent noise-sensitive property line, in accordance with the LAMC. The operation of mechanical equipment would not result in generation of noise levels in excess of standards established by the City and impacts would be less than significant.

Loading Dock Areas

Loading dock activities such as truck movements/idling and loading/unloading operations generate noise levels that have the potential to adversely impact adjacent land uses during long-term Project operations. Loading dock activities would not result in the generation of noise levels in excess of established City standards. As such, impacts would be less than significant and no mitigation measures are required. The Project would also incorporate PDF NOISE-1 to ensure impacts would be less than significant.

Refuse Collection Areas

Refuse collection activities such as truck movements/idling and trash compactor operations would generate noise levels that have the potential to adversely impact adjacent land uses during long-term Project operations. Truck idling and trash compactor noise would be approximately 54 dBA L_{eq} and 50 dBA L_{eq}, respectively, and would not increase the ambient noise level of 75 dBA L_{eq} at this location by 5 dBA. Activities associated with the refuse collection area would not result in the generation of noise levels in excess of established City standards. As such, impacts would be less than significant and no mitigation measures are required.

Parking Structures

Noise generated within the parking structure would be effectively shielded from the off-site sensitive receptors located in the vicinity of the Project Site except on the northeast side where the partially screened or open walls on the northeast side could allow for noise within the parking structure to reach the outside environment. The Project's parking related noise levels of approximately 54 dBA would not increase the nighttime ambient noise level of 60.4 dBA measured along S. Figueroa Street by 5 dBA. The Project's parking area would not result in the generation of noise levels in excess of City standards. Thus, this impact would be less than significant.

Ground Borne Vibration

Structural Impacts

Construction activities at the Project Site have the potential to generate low levels of groundborne vibration as the operation of heavy equipment generates vibrations that propagate through the ground and diminish in intensity with distance from the source. The nearest off-site receptors to the Project Site that could be exposed to vibration levels generated from Project construction include the residences at the Circa project located north of the Project Site and currently under construction. However, groundborne vibrations from construction activities very rarely reach the levels that can damage structures, but they may be perceptible in buildings very close to a construction site.

Vibration velocities from construction could range from 0.003 to 0.089 in/sec PPV at 25 feet from the source of activity. Residential receptors R2, R3, R4, R6, and R7 are located more than 100 feet from the Project Site. Therefore, based on the information shown in Table 4.8-19 in the Draft EIR, which shows an estimated 87 VdB (0.089 in/sec PPV) at a distance of 25 feet at receptor R5 from the Project Site, these residential receptors would not be exposed to in/sec PPV groundborne vibration levels exceeding the FTA's 94 VdB (0.2 in/sec PPV) for non-engineered concrete and masonry buildings. As such, the vibration impacts at these residential buildings would be less than significant, and no mitigation measures are required.

Construction trucks (e.g., haul, delivery and construction trucks) would also generate ground-borne vibration as they travel along the Project's anticipated haul route. Since PDF TRAF-1 would identify haul routes and the location of any roadway or sidewalk closures as well as traffic detours, roadway travel over uneven road surfaces in the immediate vicinity of a building is not expected. As such, impacts would be less than significant with respect to structural impacts.

Human Annoyance – Operation

The potential vibration levels of approximately up to 50 VdB to 60 VdB from all Project operational sources at the closest existing and future sensitive receptor locations would be less than the significance threshold of 72 VdB for perceptibility for "Frequent Events." As such, the Project operations would not result in the generation of excessive groundborne vibration. Impacts associated with operation of the Project would be below the significance threshold and impacts would be less than significant.

Public and Private Airport Noise

The Project Site is not located within an airport land use plan or within two miles of an airport. Therefore, the Project would not expose its future residents or residents within the Project vicinity to excessive noise levels from airport use. This impact will also be clearly insignificant and unlikely to occur.

Cumulative

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to operation of the Project and related projects, as traffic is the greatest source of operational noise in the Project area. Cumulative traffic-generated noise impacts were assessed based on a comparison of the future cumulative base traffic volumes with the Project to the existing base traffic volumes without the Project. The noise levels associated with existing base traffic volumes without the Project, and cumulative base traffic volumes with the Project are provided in Table 4.8-20, Off-Site Traffic Noise Impacts – Future 2022 Cumulative Increment. Table 4.8-20 shows the Project's contribution to the cumulative noise levels. The maximum cumulative noise increase from the Project plus related project traffic would be 3.2 dBA CNEL, which would occur along 12th Street, between S. Figueroa Street and S. Flower Street, where there are commercial uses within "normally acceptable" category with up to 63.9 dBA CNEL. This increase in sound level would not exceed the significance threshold of an increase of 5 dBA CNEL. As a result, cumulative traffic related noise impacts would be less than significant.

The LAMC-required provisions that limit stationary source noise from equipment such as rooftop mechanical equipment would ensure that noise levels would be less than significant at the property line for each related project. In addition, the types of on-site noise generated by each related project in the vicinity would be similar to noise from mixed-use multi-family residential projects that do not include substantial operational on-site noise generators. It follows that operational noise levels from the related projects would not be substantial considering the ambient noise levels in the surrounding urban environment. Further, noise from other stationary sources, including parking structures, open space activity and loading docks would be limited to areas in the immediate vicinity of each related project. The Project includes mitigation measures to reduce operational noise levels below a level of significance. And, there are not substantial on-site noise generators associated with the related projects that could combine with the on-site operational noise of the Project to create a cumulatively considerable significant impact As such, the Project's composite stationary source impacts considered together with potential operational noise from the related projects would be less than significant and would not result in a significant cumulative stationary source noise impacts.

Operation of the Project would result in generally low levels of vibration that would not exceed the threshold for human annoyance. The related projects would be expected to generate similarly low vibration levels from the same types of sources as the Project, such as commercial-grade stationary mechanical and electrical equipment, air handling units, condenser units, exhaust fans, and passenger vehicle circulation within parking areas. Due to the rapid attenuation characteristics of groundborne vibration, the generally low level of vibration from these types of sources, and the distance from each of the related projects to the Project Site, there is no potential for cumulative operational impacts with respect to groundborne vibration. Therefore, the potential for cumulatively significant groundborne vibration impacts is less than significant.

Project Design Features

PDF NOISE-1: Prohibition of Idling: The Project shall not allow delivery truck idling of main engines in the loading area pursuant to applicable City and State standards. Signs shall be posted prohibiting idling.

Conclusion

No mitigation measures are included in the EIR with respect to the above thresholds of significance since impacts are less than significant with incorporation of PDF-NOISE-1.

Population and Housing

Induce Substantial Population Growth

The Project would not have indirect effects on growth through such mechanisms as the extension of roads and infrastructure, since the infill Project would utilize the existing transportation and utility infrastructure to serve the Project. The Project would provide approximately 1,162 hotel rooms and 13,145 square feet of ground-floor retail space. The increase in growth is consistent with Southern California Association of Government's (SCAG) growth projections, and therefore impacts regarding consistency with the projections would be less than significant. This impact will also be clearly insignificant and unlikely to occur.

Displace Existing Housing or Persons

No residential dwelling units are currently located on the Project Site. Thus, the Project would not result in the demolition of existing housing units. Since no existing housing would be displaced, there would be no necessity for the construction of replacement housing elsewhere. This impact will also be clearly insignificant and unlikely to occur.

Public Services - Fire Protection

Construction

Construction activities associated with the demolition of the existing on-site structures and the construction of the Project have the potential require fire protection and EMS response. However, in compliance with OSHA and Fire and Building Code requirements, construction managers and personnel would be trained in fire prevention and emergency response. Fire suppression equipment specific to construction would be maintained on-site. Additionally, Project construction would comply with applicable existing codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Therefore, Project construction impacts on the demand for fire protection and EMS would be less than significant.

Project construction activities could also potentially affect emergency response times and emergency access to the Project Site and the vicinity due to Project construction traffic and temporary street closures. A Construction Management Plan would be implemented to minimize disruptions to through traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses (PDF TRAF-1). Furthermore, Project construction activities would be temporary and intermittent, and construction haul routes would require approval by the Los Angeles Department of Transportation (LADOT) prior to construction. Therefore, Project construction would not result in substantial adverse impacts to emergency response times and emergency access.

Based on the above, Project construction would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts would be less than significant.

Operation

The LAFD has determined that existing fire protection resources are adequate to serve the Project and that adherence to LAFD recommendations would reduce potential impacts to an

acceptable level. Also, response times to the Project Site from the closest fire stations are within standards.

The Project would comply with the applicable Building Code, Fire Code, other LAMC, and LAFD requirements. Given these regulatory requirements and PDF TRAF-1, and given the LAFD's determination that existing fire protection resources are "adequate" to serve the Project, the incremental increase in demand for fire protection and EMS resulting from Project operation would not be substantial enough to require a new fire station, or the expansion, consolidation, or relocation of an existing fire station, to maintain existing service levels. Also, based on the distance criteria and compliance with LAFD requirements, the Project would not require the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility in order to maintain service. As such, the potential for physical impacts associated with construction of new fire service facilities are considered less than significant.

Based on the above, Project operation would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts would be less than significant.

Emergency Access

Emergency access to the Project Site is provided by the three streets bordering the Project Site, including: (1) an ingress/egress driveway alley off W. Pico Boulevard; (2) an ingress-only driveway off S. Figueroa Street; and (3) an ingress/egress driveway off S. Flower Street. The Project would provide Fire Department access roadways, fire lanes, building access, and emergency directional signage as required by the LABC and LAMC. Furthermore, the Project would be subject to the review and approval of the LAFD for compliance with emergency access requirements, prior to the issuance of building permits. Therefore, adequate emergency access would be provided, and the impact would be less than significant.

Domestic Water Flow and Demand

The Project's domestic water demand is based on the approved WSA prepared for the Project (provided in Appendix L to the Draft EIR), which relies on the City's BOS sewerage generation factors. Based on the Utility Technical Report, the Hotel A/B Tower would have a domestic water demand for 620 gpm and would be connected to the 12-inch main in Figueroa Street for domestic and fire-flow demand, and the Hotel C Tower would have a domestic water demand for 480 gpm and would be connected to the 8-inch main in Flower Street for domestic and fire-flow demand. The approved Service Advisory Request (SAR) (provided in Exhibit 1 of the Utility Technical Report) confirms that the meter assembly capacity of a 6-inch line is 700 gpm, and therefore the existing infrastructure has adequate capacity to serve the Project.

Fire Flow and Demand

As previously stated, the LAFD has determined that the required fire-flow for the Project would be 6,000 to 9,000 gpm (total) from five fire hydrants flowing simultaneously with a residual water pressure of 20 psi. Project impacts with respect to fire-flow requirements would be less than significant because LADWP has confirmed that existing fire-flow from five hydrants in the Project vicinity would be available at sufficient gpm to serve the Project. The Project would be designed to comply with applicable regulatory requirements of the Fire Code, and development plans would be subject to review and approval by the LAFD.

Cumulative

The increase in development and service population from these related projects would generate, in conjunction with the Project, the need for additional fire protection and EMS from these fire stations. As discussed below, however, the incremental increase in demand on LAFD services would not result in a cumulatively considerable impact.

With regard to facilities and equipment, similar to the Project, the related projects would be required to implement all applicable Building Code and Fire Code requirements, demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects.

Compliance with applicable regulatory requirements would ensure that adequate fire prevention features would be provided and reduce demand on LAFD facilities and equipment. As with the Project, other related projects may also include the installation of automatic The Project, as well as the related projects, would also generate revenues to the City's Municipal Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate by the City.

With regard to response distance, given that the Project Site is located within an urban area, each of the related projects within the geographic scope would likewise be developed within urbanized locations serviced by one or more existing fire stations. Additionally, in accordance with Fire Code requirements, if the related projects would not be within the acceptable distance from a fire station, the related project would be required to install an automatic fire sprinkler system to comply with response distance requirements. Similarly, as with the Project, the related projects would be required to comply with all applicable Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access.

Further, the protection of public safety pursuant to the General Plan is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time. The LAFD indicated that there are no immediate plans to increase staffing or resources in the area around the Project Site. Accordingly, the potential need for additional fire protection services as part of an unplanned fire station at this time is not an environmental impact that the Project would be required to mitigate.

Therefore, the Project's contribution to cumulative fire protection and EMS impacts would not be cumulatively considerable. The Project, when considered together with certain related projects, would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection and EMS. Cumulative impacts would be less than significant.

Project Design Features

PDF TRAF-1: Construction Management Plan: A detailed Construction Management Plan shall be submitted to the City's Department of Transportation (LADOT) for review and approval prior to the start of any construction work. The Construction Management Plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. The Construction Management Plan shall formalize how construction shall be carried out and identify specific actions that shall be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities

and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following mandatory elements:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Figueroa Street, Flower Street, and Pico Boulevard, to ensure traffic safety on public rights of way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's Figueroa Street, Flower Street and Pico Boulevard driveways.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Sequencing construction activity to reduce the amount of construction-related traffic on arterial streets.
- Contain construction activity within the Project Site boundaries.
- Coordination with LADOT to address any overlapping of construction with the MyFigueroa project.
- Coordination with Metro to address any construction near the railroad right of way.
- Safety precautions for pedestrians and bicyclists through alternate routing and protection barriers/fencing that shall be implemented.
- Scheduling of construction-related deliveries and haul trips so as to occur outside the commuter peak hours.

Conclusion

No mitigation measures are included in the EIR with regard to Public Utilities – Fire Protection, and impacts would be less than significant with the incorporation of PDF-TRAF-1.

Public Services - Police Protection

Construction

During short-term Project construction, the Project Site which could be subject to theft or vandalism, potentially requiring Los Angeles Police Department (LAPD) involvement. The potential impacts during construction would be addressed through a number of security measures found in PDF POL-1 to limit access to construction areas, including private security, construction fencing, and locked entry. Incorporation of PDF POL-2 would also ensure impacts would be less than significant.

Short-term Project construction activities would generate traffic and may involve temporary lane closures. PDF TRAF-1, which would be subject to review and approval by LADOT would ensure that adequate and safe access remains available at the Project Site during construction activities.

The various safety features that would be implemented during Project construction would reduce the potential for incidents that would require police response. Thus, based on the above,

temporary construction activities associated with the Project would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site, nor would Project construction cause a substantial increase in emergency response times as a result of increased traffic congestion. Therefore, Project construction would not result in substantial adverse physical impacts associated with the provision or need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives for police protection. Impacts on police protection services during Project construction would be less than significant.

Operation

The Project would introduce additional employees, hotel guests, and retail/restaurant customers to the Project Site which could potentially require an increase in LAPD police responses. Demand for police services would be reduced as the result of the security services provided by the South Park BID Safety Team, which would help patrol the Project Site and surrounding area; and the proposed security features set forth in PDF POL-3, including private on-site security and a close circuit television system. The improved safety conditions around the Project Site after development could beneficially impact the level of potential criminal activity in the immediate vicinity.

LAPD assessed the Project characteristics in its April 18, 2017 letter, and stated that while there could be an increased need for police services, there are no current plans to expand the Central Community Police Station or increase the number of personnel assigned to the Central Area. This conclusion, coupled with an adequate officer-per-resident ratio before and after the Project, indicates that operational impacts on police protection services would be less than significant.

In addition, emergency response times are not expected to significantly increase as a result of the Project. Therefore, Project operation would not result in substantial adverse physical impacts associated with the provision or need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives for police protection. Impacts would be less than significant.

Cumulative

The increase in development and service population from these related projects would generate, in conjunction with the Project, the need for additional police protection from the Central Community Police Station. As discussed below, however, the incremental increase in demand on LAPD services would not result in a cumulatively considerable impact.

However, similar to the Project, each related project would be subject to the City's routine construction permitting process that includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police services. With respect to operations, the related projects would be required to demonstrate general conformance with applicable General Plan goals, objectives, and policies pertaining to police services as part of environmental review. As part of this process, the related projects (particularly those of a larger nature) would be subject to review by LAPD to implement sufficient security measures are implemented to reduce potential impacts to police protection services. Similarly, many of the related projects would also be expected to provide on-site security, personnel and/or PDF that reduce demand for police protection services.

Accordingly, the Project would not have cumulatively considerable impacts on police protection services. The Project would not independently, or when combined with the related projects,

directly require the development of a new or expanded police facility. Therefore, the Project would not result in a cumulatively considerable or substantial adverse physical impact associated with the provision or need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives for police protection. Cumulative impacts on police protection services would be less than significant.

Project Design Features

PDF POL-1: On-Site Construction Security Measures: During construction, on-site security measures shall include:

- Private security personnel shall monitor vehicle and pedestrian access to the construction areas and the Project Site; and
- Construction fencing with gated and locked entry shall be installed around the perimeter of the construction site.

PDF POL-2: Provision of Project Diagrams to LAPD: Prior to the issuance of a building permit, the Project shall provide the LAPD Central Area Commanding Officer with a diagram of each portion of the Project Site, including access routes, gate access codes, and additional information, as required, to facilitate potential LAPD responses.

PDF POL-3: **On-Site Operational Security Measures:** The Project shall provide an extensive security program to ensure the safety of hotel guests, employees and other visitors to the Project Site. On-site security measures during Project operation shall include:

- Comprehensive coverage and monitoring of key areas through Close Circuit Television (CCTV) systems;
- Access to non-public areas of the Project shall be restricted by electronically controlled locking and access cards;
- Full time 24-hour security shall be provided, including security in each hotel tower along with roving patrols

PDF TRAF-1: Construction Management Plan: A detailed Construction Management Plan shall be submitted to the City's Department of Transportation (LADOT) for review and approval prior to the start of any construction work. The Construction Management Plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. The Construction Management Plan shall formalize how construction shall be carried out and identify specific actions that shall be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following mandatory elements:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Figueroa Street, Flower Street, and Pico Boulevard, to ensure traffic safety on public rights of way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's Figueroa Street, Flower Street and Pico

Boulevard driveways.

- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Sequencing construction activity to reduce the amount of construction-related traffic on arterial streets.
- Contain construction activity within the Project Site boundaries.
- Coordination with LADOT to address any overlapping of construction with the MyFigueroa project.
- Coordination with Metro to address any construction near the railroad right of way.
- Safety precautions for pedestrians and bicyclists through alternate routing and protection barriers/fencing that shall be implemented.
- Scheduling of construction-related deliveries and haul trips so as to occur outside the commuter peak hours.

Conclusion

No mitigation measures are included in the EIR with regard to police protection, and impacts would be less than significant in consideration of the Project Design Features.

Public Services - Schools

There would be no new student population associated with Project construction. Because the Project contains no residential component, the Project's projected student generation is likely to be less than estimated. The Project's retail and hotel uses would generate few, if any, students. For Project operation, if Project employees currently reside in neighboring communities and have school children, it is expected the children would remain enrolled in their current school. If employees with school-age children choose to move closer to the Project Site for work, or if new employees with school-age children are hired form the surrounding community or another City, there could be an increase in student population in the nearby schools of up to 10 students.

To the extent that on-site development increases demand at LAUSD schools serving the Project Site, State law, including Government Code Section 65995 and Education Code Section 17620, requires the payment of fees at a specified rate for the funding of improvements and expansion to school facilities. Such fees are paid upon the issuance of building permits. In accordance with Senate Bill 50 (SB 50), enacted in 1998, the payment of this fee is deemed to provide full and complete mitigation for impacts to school facilities and impacts to schools would therefore be reduced to a less than significant level. No mitigation measures are required. This impact will also be clearly insignificant and unlikely to occur.

Public Services - Parks

Since the Project does not include residential uses, it would generate minimal demand for existing parks and recreational facilities. However, a small percentage of new visitors and employees to the Project Site might visit nearby parks and generate some degree of increased demand on existing public recreational and park facilities. The proposed hotels include open space above the podiums and on the rooftops, including pool decks and community gathering areas. These facilities would reduce the Project's limited demand for use of existing public

recreational and park facilities. Therefore, there would be a less than significant impact on park services in the Project area. This impact will also be clearly insignificant and unlikely to occur.

Public Service - Other Public Facilities

Since there is no residential component to the Project, the only potential new library visitors, if any, would be employees or visitors to the Project Site. The addition of 594 new employees to the Project Site would not materially change demand on local libraries. Therefore, there would be a less than significant impact associated with library services.

During construction and operation of the Project, other governmental services, including roads, would continue to be utilized. Project patrons, visitors, and employees would use the existing road network, without the need for new roadways to serve the Project Site. However, the additional use of roadways would not be excessive and would not necessitate the upkeep of such facilities beyond normal requirements. Therefore, the Project would result in less than significant impacts on other governmental services. This impact will also be clearly insignificant and unlikely to occur.

Recreation

Increased Use of Existing Neighborhood and Regional Parks

The Project would introduce new visitors and employees to the Project Site and greater demand on existing public recreational and park facilities and services could be generated. As the Project would provide approximately 39,790 square feet of private and public open spaces across the Project Site through the provision of hardscape, planting areas, pools and decks, fitness centers, and other guest amenities, Project-related demand existing public recreational and park facilities would be minimal. Therefore, the Project would not cause or accelerate the deterioration of regional or neighborhood parks and recreational facilities. This impact will also be clearly insignificant and unlikely to occur.

New or Required Construction of Recreational Facilities

The Project would provide both publicly accessible and private open space and recreational amenities. These Project features have been incorporated into the overall Project design. Therefore, the construction of these recreational facilities as part of the Project would take place at the same time as the rest of the construction processes and would have no additional adverse physical effects on the environment. Therefore, there would be a less than significant impact in regards to construction or expansion of recreational facilities which may have adverse physical effects on the environment. This impact will also be clearly insignificant and unlikely to occur.

Transportation and Traffic

Congestion Management Program

Arterial Monitoring Station Analysis

One arterial CMP monitoring station is located within 2 miles of the Study Area (i.e., Alvarado Street & Wilshire Boulevard, which is located approximately 1.25 miles northwest of the Study Area boundary (Intersection #7 Georgia Street/SR-110 Northbound Off-Ramp & 9th Street). The Project is expected to add 10 trips during the A.M. and P.M. peak hours at this arterial monitoring intersection, which is fewer than the 50 peak-hour trip threshold set by the CMP for

analysis of arterial monitoring intersections. Therefore, the Project's CMP arterial intersection impacts are considered to be less than significant and no further analysis is required.

Freeway Segment Analysis

The CMP identifies four mainline freeway monitoring location within the vicinity of the Project Site, SR-110 south of US 101 – approximately 1.50 miles northeast of the Project Site; SR-110 at Alpine Street – approximately 2.15 miles northwest of the Project Site; US 101 north of Vignes Street – approximately 2.25 miles northeast of the Project Site; and I-10 at Budlong Avenue – approximately 1.65 southwest of the Project Site.

The Project would add no more than 33 trips during the a.m. and p.m. peak hours in either direction on these freeway mainline monitoring locations, which is fewer than the 150 peak-hour trip threshold set by the CMP for analysis of mainline freeway segments. Nonetheless, to provide conservative and robust analysis, further CMP analysis was conducted to provide additional information related to the Project's potential incremental effects on the freeway mainline facilities based on the measured flow compared to the estimated capacity of the freeway mainline section. The changes in the D/C ratio during the a.m. and p.m. peak hour at the four CMP mainline freeway monitoring locations with the addition of Project traffic would not exceed the CMP significance threshold of 0.02 under either Existing or Future Conditions. Therefore, the Project would result in a less than significant impact on the CMP freeway segments.

Air Traffic Patterns

The two nearest airports are the Santa Monica Municipal Airport and the Los Angeles International Airport, which are located approximately 11 miles west and 11 miles southwest of the Project Site, respectively. The Project is within the cluster of high-rise towers that comprise the downtown area of Los Angeles. As such, the Project is not anticipated to alter air traffic patterns or affect the utilization of navigable air space. Further, to ensure the safety of residents and guests from localized aircraft (e.g., helicopters), the Project would be subject to the Federal Aviation Administration's (FAA) Federal Aviation Regulations Part 77, Objects Affecting Navigable Airspace. These regulations ensure air safety by regulating construction or alteration of buildings or structures that may affect navigable airspace, and apply to buildings with a height of over 200 feet above ground level. The Project would result in the development of two towers on the site that would be 529 and 326 feet above grade. In accordance with FAA regulations, and similar to other downtown high-rise buildings, the Project would be required to notify the FAA of the building's location and height, and install flashing beacons and/or steady burning lights to demarcate the building's location to aircraft. As such, the Project would not result in a change in air traffic patterns including, increases in traffic levels or changes in location that would result in substantial safety risks. This impact will also be clearly insignificant and unlikely to occur.

Increased Hazards Due to a Design Features or Incompatible Use

Vehicular access would be provided via three driveways along W. Pico Boulevard, S. Figueroa Street, and S. Flower Street, the three major roadways surrounding the Project Site. Hotel pick-up/drop-off areas would be primarily accessed via the existing alley along W. Pico Boulevard. LADOT reviewed and approved the Traffic Study wherein the Project design includes an eastbound left-turn lane along W. Pico Boulevard that would be provided to minimize the potential for blocking through-vehicles and creating vehicle queues on W. Pico Boulevard. Access to the parking structure would be provided via the inbound-only driveway on S. Figueroa Street, which currently provides both inbound and outbound access, and the primary Project driveway which would be located in the same location as the current alley along W. Pico

Boulevard. Secondary access to the hotel pick-up/drop-off and the parking garage would be provided via a new driveway on S. Flower Street. The driveways would be designed based on LADOT standards. The driveways would not require the removal or relocation of existing transit stops and would be designed and configured to avoid potential conflicts with transit services and pedestrian traffic.

With respect to access and compatibility with neighboring land uses, the Project Site is bordered by commercial uses to the east and the Metro Pico Station; commercial uses to the west (the Los Angeles Convention Center); the under-construction Circa high-rise mixed-use commercial and residential project to the north; and a mix of commercial retail and residential uses to the south. The ingress/egress driveway for the parking structure for residential property south of the Project Site, City Lights on Fig, aligns with the existing alley/future driveway for the Project Site and therefore there is no conflict along W. Pico Boulevard with respect to Project Site access. Similarly, the future Project Site driveway on S. Figueroa Street, against the northern property boundary, would be in the same location as the existing driveway in that location. The Project would limit access to in-bound only traffic at the S. Figueroa Street driveway rather than the current inbound and outbound traffic. The driveway onto S. Flower Street would allow right-turn-only Project Site ingress and egress since it is a 1-way street.

Pedestrian access to the hotels would be provided from the porte-cochères along the alley, primarily accessed via W. Pico Boulevard. Pedestrian access to the commercial uses would be provided from S. Figueroa Street, S. Flower Street, and W. Pico Boulevard. The Project access locations would be designed to City standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. All roadways and driveways intersect at right angles, and street trees and other potential impediments to adequate driver and pedestrian visibility would be minimal.

Therefore, the Project would not create or substantially increase hazards due to a design feature or incompatible uses.

Emergency Access

Existing emergency access to the Project Site is considered adequate based on the response distances of the first-due Engine Company and first-due Truck Company, which are both housed at Fire Station No. 10, located 0.33 mile from the Project Site. Project construction activities could potentially affect emergency response times and emergency access to the Project Site and the vicinity due to Project construction traffic and temporary street closures. However, because of the close proximity of the first-due and other fire stations, and with implementation of PDF TRAF-1, Construction Management Plan, which is intended to minimize disruptions to through-traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses, construction impacts on emergency access were determined to be less than significant.

With respect to Project operations, the Project Site is bordered by three major streets and would provide: (1) an ingress/egress driveway alley off W. Pico Boulevard, (2) an ingress-only driveway off S. Figueroa Street, and (3) an ingress/egress driveway off S. Flower Street. The final design of emergency access features would be subject to the review and approval of the LAFD for compliance with emergency access requirements, prior to the issuance of building permits. Therefore, adequate emergency access would be provided. Operational impacts on emergency access would be adequate and impacts would be less than significant.

Conflict with Adopted Policies, Plans or Program Regarding Public Transit, Bicycle, or Pedestrian Facilities

The Project would be consistent with policies, plans, and programs that support alternative transportation, including the Mobility Plan and 2010 Bicycle Plan, Central City Community Plan, MyFigueroa project, and Los Angeles Streetcar project. The Project would support alternative transportation by: enhancing the pedestrian experience through the provisions of wide sidewalks and landscaping, and providing a connection with the Convention Center, Staples Center, and LA LIVE; concentrating mixed use development within the Downtown Center near public transit; supporting bicycle and pedestrian uses along Figueroa Street and 11th Street consistent with MyFigueroa project and the Los Angeles Streetcar project;; and providing bicycle parking in compliance with LAMC requirements. Therefore, the Project would not conflict with policies, plans, and programs that support alternative transportation, and impacts would be less than significant.

Cumulative

As discussed above and in the Draft EIR, the CMP analysis incorporates cumulative development by taking into consideration related projects and anticipated growth. As such, consistent with the analysis above, cumulative impacts related to a conflict with an applicable CMP, considered together with related projects, would not be a significant cumulative impact. Thus, the Project's incremental effect would not be cumulatively considerable.

The Project's impacts to hazards due to design features or incompatible uses or inadequate emergency access would be less than significant. Additionally, construction and operation of future projects would be subject to LADOT standards and final design of emergency access features would be subject to the review and approval of the LAFD for compliance with emergency access requirements. As such, the Project's contribution to cumulatively significant impacts on increasing hazards or inadequate emergency access, considered together with the related projects, would not be a significant cumulative impact. Thus, the Project's incremental effect would not be cumulatively considerable.

The Project would also be consistent with policies, plans, and programs that support alternative transportation, including the Mobility Plan and 2010 Bicycle Plan, Central City Community Plan, MyFigueroa project, and Los Angeles Streetcar project. The Project would also support alternative transportation. Future projects would also be required to be consistent with applicable policies, plans, and programs. Therefore, the Project's impacts would be less than significant, and considered together with related projects would not be a significant cumulative impact. Thus, the Project's incremental effect would not be cumulatively considerable.

The Project Site is served by numerous bus lines, as well as the Metro Red Line, Purple Line, Blue Line and Expo Line, and Foothill Transit, OCTA, and Torrance Transit bus lines. Although the Project (and other related projects) will cumulatively add transit ridership, the Project Site, Downtown Los Angeles, and the Study Area are well served by a vast amount of transit service with regional connectivity. It follows that capacity constraints in one transit resource or station do not necessarily translate directly into impacts on capacity of the transit system to service ridership regionally. Overall, the Traffic Study (Appendix K to the Draft EIR) demonstrates that the total transit capacity along the routes of those lines can accommodate the Project and cumulative impacts of the related projects and anticipated growth. Therefore, the Project impact to the regional transit system would be less than significant, and considered together with related projects would not be a significant cumulative impact. Thus, the Project's incremental effect would not be cumulatively considerable.

Project Design Features

PDF TRAF-1: Construction Management Plan: A detailed Construction Management Plan shall be submitted to the City's Department of Transportation (LADOT) for review and approval prior to the start of any construction work. The Construction Management Plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. The Construction Management Plan shall formalize how construction shall be carried out and identify specific actions that shall be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following mandatory elements:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Figueroa Street, Flower Street, and Pico Boulevard, to ensure traffic safety on public rights of way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's Figueroa Street, Flower Street and Pico Boulevard driveways.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Sequencing construction activity to reduce the amount of construction-related traffic on arterial streets.
- Contain construction activity within the Project Site boundaries.
- Coordination with LADOT to address any overlapping of construction with the MyFigueroa project.
- Coordination with Metro to address any construction near the railroad right of way.
- Safety precautions for pedestrians and bicyclists through alternate routing and protection barriers/fencing that shall be implemented.
- Scheduling of construction-related deliveries and haul trips so as to occur outside the commuter peak hours.

Conclusion

No mitigation measures are included in the EIR with respect to the above thresholds of significance since impacts are less than significant with implementation of PDF TRAF-1.

Tribal Cultural Resources

Substantial Adverse Change in the Significance of a Tribal Cultural Resource Defined in Public Resources Code Section 21074 and Listed in Public Resources Code Section 5024.1(k).

The City sent notification letters on January 27, 2017 to the California Native American Tribes that requested inclusion on the City's AB 52 notification list. On July 19, 2017, the City, after

acting in good faith and with reasonable effort, concluded consultation for the Project. The City determined that the record did not contain substantial evidence that the Project may cause a significant impact on a tribal cultural resource. The City also determined that no mitigation measures relating to tribal cultural resources were required.

Finally, none of the potential tribal resources disclosed during the consultation process, or after the City had concluded consultation, are either listed or eligible for listing in the California Register or in a local register of historical resources as defined in PRC Section 5020.1(k). Therefore, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074. Impacts would be less than significant and no mitigation measures are required.

Substantial Adverse Change in the Significance of a Tribal Cultural Resource Defined in Public Resources Code Section 21074 and Determined by the Lead Agency to be Significant under Public Resources Code Section 5024.1(c)

In compliance with AB 52, the City sent notification letters on January 27, 2017 to the California Native American Tribes that requested inclusion on the City's AB 52 notification list. On July 19, 2017, the City, after acting in good faith and with reasonable effort, concluded consultation for the Project. Accordingly, the City determined, in its discretion based on the evidence in the record, that the Project would not cause a substantial adverse change in the significance of a tribal cultural resource pursuant to the criteria in subdivision (c) of PRC Section 5024.1. Therefore, impacts would be less than significant and no mitigation measures are required.

Cumulative

As demonstrated above, the Project does not result in a significant impact to a tribal cultural resource. Specifically, there are no resources listed or determined eligible for listing, on the national, state, or local register of historical resources and the Lead Agency determined that resources identified during AB 52 tribal consultation are not eligible for listing under the criteria in subsection (c) of the Public Resources Code Section 5024.1. Therefore, the Project itself does not make a contribution to a cumulative impact on tribal cultural resources. Accordingly, the impact to tribal cultural resources cannot be characterized as a cumulative impact of the Project.

Further, in compliance with CEQA review, AB 52 consultation was completed for the Project. Similarly, consultations would be required for the related projects with California Native American Tribes in order to identify potential impacts to tribal cultural resources. There are no other ongoing or foreseeable contiguous excavations adjacent to the Project Site that could, when viewed together with the Project, cause a substantial adverse change in the significance of a tribal cultural resource. Therefore, the Project would not independently contribute to a cumulative impact, and when considered together with the related projects, would not create a cumulative impact. Therefore, impacts are less than cumulatively considerable and there are no cumulatively significant impacts on tribal cultural resources.

Utilities

Exceed Wastewater Treatment Requirements of Los Angeles Regional Water Quality Control Board

Construction activities would produce nominal amounts of wastewater from construction workers on the Project Site. The resultant waste would be disposed of off-site by licensed waste haulers and would not be directed to the City's sewer system. Therefore, construction activities

would not create wastewater that would exceed the treatment requirements of the applicable RWQCB.

Operationally, the Project would increase the amount of wastewater generated at the Project Site. Similar to existing conditions, the effluent from the Project would be conveyed to Hyperion Water Reclamation Plant (HWRP) and the HWRP continually monitors all effluent to ensure it meets applicable water quality standards of the RWQCB. These standards are more stringent than those required under the operable NPDES permit. Therefore, the Project would comply with the wastewater treatment requirements of the RWQCB. Impacts would be less than significant.

Require Construction of New Wastewater Treatment Facilities or Expansion of Existing Facilities

Construction

During construction of the Project, a nominal volume of wastewater would be temporarily generated by on-site construction workers, totaling less than is generated by the on-site uses under existing conditions. The wastewater would not be directed into the City's sewer system and would not increase in wastewater flows from the Project Site compared to existing conditions.

Construction of the Project would include all necessary on- and off-site sewer pipe improvements and connections to adequately connect to the City's existing sewer system. Construction would occur on the Project Site and be primarily confined to trenching for miscellaneous utility lines and connections to public infrastructure. The designs of these connections would be developed by a registered engineer and approved by the City's Bureau of Engineering.

Therefore, existing wastewater treatment capacity, and future wastewater treatment capacity, show that sufficient wastewater treatment capacity would be available for Project construction. The Project would not require the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Impacts would be less than significant.

Operations

The Project Site would continue to be served by existing City water and utility lines, including the 10-inch sewer main in S. Figueroa Street and the 10-inch sewer main in W. Pico Boulevard. The Project would result in an estimated average daily wastewater generation of approximately 310,898 gpd. However, after subtracting the existing wastewater generation of 55,600 gpd, the Project would result in a net increase of 255,298 gpd of wastewater generation over existing conditions. The proposed increase of 255,298 gpd from the Project is approximately 0.2553 million gallons per day (mgd), which equals 0.146 percent of HWRP's available capacity.

The capacity of sewer lines to serve the Project, specifically 10-inch sewer main in S. Figueroa Street and 10-inch sewer main in W. Pico Boulevard, was validated through the City Bureau of Engineering's (BOE) letter responses to a SCAR application in April 2017. The letters indicate that sufficient hydraulic capacity exists in the system to accommodate wastewater generated during operation of the Project.

Moreover, the existing design capacity of the HWRP is approximately 450 mgd. Currently, approximately 275 mgd is treated at the HWRP, resulting in residual treatment capacity of approximately 175 mgd. The proposed increase of 255,298 gpd (equivalent to 0.2553 mgd)

generated during Project operation would represent 0.146 percent of the HWRP's existing residual capacity.

For future conditions, as discussed below in cumulative impacts, the average dry weather flow for HWRP, as projected by Integrated Resource Plan (IRP), would be 435 mgd in 2020. The net increase in wastewater that would result from Project operation could be accommodated within the projected available capacity of the HWRP for 2020 and would not substantially increase the projected average dry weather wastewater flows to the HWRP.

Therefore, given the amount of wastewater generated during Project operation, existing wastewater treatment capacity, and future wastewater treatment capacity, sufficient wastewater treatment capacity would be available to serve the proposed Project. The Project would not require the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Impacts would be less than significant.

Construction of New Water Facility or Expansion of New Water Facilities

The Project would be responsible for providing the necessary building water system on the Project Site and any extensions to connect the Project Site to existing water lines in the area. The Project would connect to existing water mains located within the adjacent street right-of-ways. These include, per LADWP and available record data, a 12-inch and 16-inch water main in S. Figueroa Street, a 24-inch main in W. Pico Boulevard, and an 8-inch water main in S. Flower Street. LADWP water maps indicate that the 1240 South S. Figueroa lot is served by an existing water service off of S. Figueroa Street. The Project would require construction of new, on-site water distribution lines to provide the new building water service for the 601 W. Pico Boulevard lot.

As stated in the SAR, the Project would connect to the existing 16-inch main in S. Figueroa Street and 8-inch main in S. Flower Street to provide for domestic water flow services. Connecting to these existing mains would be through standard trenching and grading activities; does not materially change the construction activities associated with the Project. No upgrades to public water mains are anticipated. According to Los Angeles Department of Water and Power (LADWP), the service lateral from the Project Site to the existing water mains would be adequately sized to accommodate domestic demand and sufficient capacity is available in the existing water mains to serve the Project. No other scheduled water infrastructure improvements are known to be planned in the area, and none are required to adequately serve the Project. Also, the City has determined that the existing water infrastructure systems have sufficient capacity to meet the Project's needs.

Therefore, the Project would not require new water facilities or the expansion of existing facilities, the construction of which would cause significant environmental effects. Impacts would be less than significant.

Water Supply

Construction

Water would be required for Project construction activities, and would occur intermittently, with demand for water consumption varied, and generally short-term and temporary in nature. The activities requiring water would not create substantial water demand. Based on a review of construction projects of similar size and duration, a conservative estimate of construction water demand would be approximately 1,000 to 2,000 gallons per day (gpd). The water supply needed for construction is merely a fraction of the operational water demand and is well within the water

supply available for the Project from existing LADWP entitlements. Impacts would be less than significant.

Operation

The Project would create new demand for the consumption of water resources that exceeds demand of the existing uses on the Project Site. As determined by LADWP in the approved WSA, the net increase in water demand for the Project would be approximately 289.84 afy. The estimate of water consumption includes the amount of water conservation required by Ordinance 180,822 and the PDF WS-1 related to water conservation, and the WSA has determined that sufficient water supplies are available to serve the project, and impacts would be less than significant.

Result in a Determination by the Wastewater Treatment Provider that the Project Has Adequate Capacity to Serve Demand

Wastewater in the City is collected and conveyed by three separate sanitary sewer systems owned and operated by LADPW. Sanitary sewer service to the Project Site from the surrounding streets is provided by BOS. As stated in the SCAR, provided in Exhibit 4 of the Utility Technical Report, the BOE requested verification from BOS for sewer capacity for the Project. BOS processed the SCAR on April 28, 2017, which led to a determination that there is capacity available to handle the anticipated discharge from the Project. Project construction would generate a nominal amount of wastewater which would be collected and disposed of off-site by a private company providing portable restrooms. Accordingly, construction-related wastewater would not constrain the City's sanitary sewer system, or substantially incrementally exceed the capacity of the HWRP.

The wastewater treatment provider (i.e., BOS), in coordination with BOE, concluded in the SCAR that sufficient capacity exists within the City's sanitary sewer system serving the Project Site to accommodate wastewater generated as part of Project operation without constraining sewer capacity. Ample future capacity also exists at the HWRP, which would treat wastewater discharged from the Project Site, to handle Project wastewater flows.

Therefore, BOS has determined there is adequate capacity to serve for the Project's demand in addition to the provider's existing commitments. The Project would not require or result in the construction of new wastewater treatment facilities or the expansion of existing facilities, the construction of which would cause significant environmental effects, and impacts would be less than significant.

Cumulative

Water Infrastructure

Development of the Project in conjunction with the related projects would cumulatively increase the need for service capacity of the existing water infrastructure. However, each cumulative project would be subject to City review to assure that the existing public water infrastructure would be adequate for the domestic and fire water conveyance demands of each project. The related projects would be required to attain SAR reports based on flow testing of water infrastructure to verify that there is available capacity at that time. Developers are required to improve infrastructure or facilities when needed and development cannot proceed without appropriate verification and approval. Furthermore, LADWP, together with the City's Department of Public Works, conducts ongoing evaluations to ensure facilities are adequate and requires infrastructure system improvements. As evidenced in the Utility Technical Report, the City determined that there is sufficient capacity in the existing water conveyance infrastructure to

support existing development, the Project, and anticipated growth. Therefore, the Project would not have a cumulatively considerable significant impact on the existing water facilities or infrastructure. Cumulative impacts on water infrastructure would be less than significant.

Water Demand

Development of the Project in conjunction with the related projects would cumulatively increase water demand in the City. LADWP provides water supply to the City and the WSA conclusions considered the Project water demand within the context of citywide water demand and anticipated growth. The cumulative water demand for the Project and the related projects is approximately 13,823,384 gpd or 15,496 afy. As discussed above, LADWP has a reliable water supply of 675,700 afy in 2040 to service an estimated demand of 675,685 afy based on anticipated growth citywide. Thus, the combined water demand from the Project and the related projects is within the available supply of LADWP. Moreover, the WSA confirmed adequate supply for the Projects and future growth within the City.

Therefore, the Project would not have a cumulatively considerable significant impact on water supply. Cumulative impacts on water supply would be less than significant.

Wastewater Generation

The HWRP has a service area encompassing 600 square miles, which provides a geographic scope for cumulative analysis. With respect to wastewater infrastructure, this analysis considers the related projects and SCAR determinations from the City that infrastructure can accommodate cumulative growth.

Wastewater Conveyance Infrastructure

As with the Project, the related projects would be subject to the provisions of the LAMC requiring provision of on-site infrastructure, improvements to connect project wastewater into the local conveyance infrastructure, payment of fees for future sewerage replacement and/or relief improvements, and a required determination by LADPW that there is allotted sewer capacity available to adequately service each project. The City accounts for other recently approved SCARs and evaluates the potential for cumulative impacts on the sanitary sewer system caused by related projects and growth.

Therefore, the Project, when considered together with the related projects, would not have a cumulatively considerable significant impact on wastewater infrastructure. The City's sanitary sewer system infrastructure would accommodate current and foreseeable new development and would have sufficient capacity for the contributions of the Project and the related projects.

Wastewater Treatment

For future conditions, as discussed below in cumulative impacts, the average dry weather flow for HWRP, as projected by IRP, would be 435 mgd in 2020. The net increase in wastewater that would result from Project operation could be accommodated within the projected available capacity of the HWRP for 2020 and would not substantially or incrementally impact increase the projected average dry weather wastewater flows to the HWRP.

As previously stated, the HWRP has a treatment capacity of 450 mgd and a projected average dry weather flow of 435 mgd in 2020, which equates to approximately 15 mgd of additional capacity in the future condition. The IRP projected that cumulative growth through 2020 within the service area, which includes the Project Site and vicinity, could be accommodated by the design capacity of the HWRP. As demonstrated above, the Project would generate 255,298

mgd of wastewater in the future operational condition and that equates to 0.017 percent of the available treatment capacity. Forecasted wastewater flow from cumulative growth (i.e., 435 mgd) for the entire service area of the HWRP includes the Project Site and surrounding areas. Thus, the incremental increase of wastewater flow from the Project is captured within the cumulative increase in wastewater flow from growth within the service area. Furthermore, even if the 0.017 percent increase in wastewater flow was added onto the cumulative increase of wastewater from all growth (255,299 gpd + 435 mgd = 435,255,299 gpd) the total wastewater flow would still be well below the 450 mgd average dry weather flow design capacity. Thus, the Project would not have a cumulatively considerable impact on the wastewater treatment capacity of the HWRP.

In addition, the HWRP currently meets applicable water quality standards as set forth by the NPDES. As such, the wastewater effluent discharged by growth within the services area boundary would have a less than significant impact on water quality. Implementation of the IRP, upgrades in the advanced treatment processes at the HWRP, and continual monitoring by the EMD would ensure that effluent discharged is within applicable limits. Thus, cumulative impacts on water quality would be less than significant.

Therefore, the Project considered with cumulative growth and projects within the sanitary sewer service area would not exceed wastewater treatment requirements of the RWQCB, require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects, or result in a determination by the wastewater treatment provider, which serves the project, that it does not have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments.

Landfill

Project construction would generate demolition waste. Construction materials are disposed of at one of the unclassified inert landfills available to the City of Los Angeles, typically the Azusa Land Reclamation Facility, which has an estimated remaining capacity of approximately 59.83 million tons or 49.86 million cubic yards. As a result, Project excavation and construction would account for only a small percentage (0.09 percent) of the Azusa Land Reclamation Facility, and construction waste would not exceed the existing capacity of this facility. Because construction waste would not exceed the capacity of existing disposal facilities and would be further reduced by recycling, impacts would be less than significant.

It is estimated that the total waste generation for the Project during operation would be approximately 854 tons per year, or 2.34 tons per day. The daily amount of solid waste generated by the Project would represent a negligible amount (0.02 percent) of the daily solid waste disposed of by the City (9,881 tons). As described in the Countywide Integrated Waste Management Plan (CoIWMP) 2014 Annual Report, future disposal needs for the 15-year planning horizon (2029) would be adequately met through the use of in-County and out-of-County facilities. It should also be noted that with annual reviews of demand and capacity in each subsequent Annual Report, the 15-year planning horizon is extended by one year, thereby providing sufficient lead time for the County to address any future shortfalls in landfill capacity.

Based on the above, Project-generated waste would not exacerbate the estimated landfill capacity requirements addressed for the 15-year planning period ending in 2029, or alter the ability of the County to address landfill needs via existing capacity and other options for increasing capacity. Therefore, impacts on solid waste disposal from Project operations and construction would be less than significant. This impact will also be clearly insignificant and unlikely to occur.

Solid Waste

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that developments include a recycling area or room of specified size on the Project Site. Further, the Project would comply with the City's Construction and Demolition Waste Recycling Ordinance. The Project would also promote compliance with AB 939 and City waste diversion goals by providing clearly marked, source sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, a less than significant impact would occur and no mitigation measures would be required. This impact will also be clearly insignificant and unlikely to occur.

Project Design Features

PDF-WS-1: Water Conservation Features: The Project shall provide the following specific water efficiency features:

- High efficiency waterless hybrid type urinals
- High efficiency water closet with flush volume of 1.1 gallons of water per flush
- ENERGY STAR® certified light commercial clothes washers – water factor of 4.2 or less, with a capacity of 4.5 cubic feet or smaller
- Domestic water heating system located close proximity to point(s) of use
- Cooling tower conductivity controllers or cooling tower pH conductivity controllers
- Water-saving pool filter
- Pool/spa recirculating filtration equipment
- Pool splash troughs around the perimeter that drain back into the pool
- Install a meter on the pool make-up line so water use can be monitored and leaks can be identified and repaired
- Reuse pool backwash water for irrigation
- Leak detection system for swimming pools and spas
- Drip/subsurface irrigation (micro-irrigation)
- Micro-spray
- Proper hydro-zoning/zoned Irrigation (groups plants with similar water requirements together)
- Landscaping contouring to minimize precipitation runoff
- Drought tolerant plants – 70 percent of total landscaping

Conclusion

No mitigation measures are included in the EIR with regard to Utilities and Service Systems, and impacts would be less than significant with implementation of PDF-WS-1.

Energy

Conflict with Adopted Energy Conservation Plans

The Project would be designed in a manner that is consistent with relevant energy conservation plans designed to encourage development that results in the efficient use of energy resources. The Project would comply with the Los Angeles Green Building Code to reduce energy consumption by implementing energy efficient building designs, reducing indoor and outdoor water demand, and installing energy-efficient appliances and equipment. These measures are

consistent with the City's sustainability and smart-growth goals of improving energy and water efficiency in buildings, decreasing per-capita water use, using energy efficient appliances and equipment, and creating a more livable city.

As provided in PDF AQ-1, PDF AQ-2, PDF TRAF-1, and PDF WS-1, the Project would also implement features that would result in energy reductions beyond those specified by regulation by incorporating energy efficient design features and VMT reduction land use characteristics. As a result, the Project would implement PDFs and incorporate water conservation, energy conservation, tree-planting, and other features consistent with the City's Green LA Plan and the Sustainable City pLAn, as well as PDFs that go beyond those specified by regulations such as the City's Green Building Ordinance. Therefore, the Project would be consistent with the City's applicable plans for conserving energy and impacts would be less than significant.

Violate State or Federal Energy Standards

The Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations restricting the idling of heavy-duty diesel motor vehicles and governing the accelerated retrofitting, repowering, or replacement of heavy duty diesel on- and off-road equipment. As discussed in Section 4.4, Greenhouse Gas Emissions, of the Draft EIR, CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other toxic air contaminants. The measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than 5 minutes at any given time.

CARB has also adopted emission standards for off-road diesel construction equipment of greater than 25 hp. The emissions standards are referred to as "tiers" with Tier 4 being the most stringent (i.e., less polluting). The requirements are phased in, with full implementation for large and medium fleets by 2023 and for small fleets by 2028. The Project would accelerate the use of cleaner construction equipment by using equipment that meet at a minimum the Tier 3 or Tier 4 interim off-road emissions standards as specified in PDF AQ-2.

The daily operation of the Project would generate demand for electricity, natural gas, and water supply, as well as generating wastewater requiring conveyance, treatment and disposal off-site and municipal solid waste requiring collection and transport off-site. The Project would comply with or exceed the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance. According to the CEC, the Title 24 (2016) standards use 5 percent less energy for lighting, heating, cooling, ventilation, and water heating than the prior Title 24 (2013) standards for non-residential uses. As specified in PDF AQ-1, the Project would be designed to include numerous energy and waste reduction features that would allow the Project to comply with and exceed the Title 24 standards and achieve greater energy savings than required by state regulations.

With respect to operational transportation-related fuel usage, the Project would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. The Project itself would co-locate complementary hotel, retail, and restaurant land uses on the site in close proximity to existing off-site commercial, residential, and retail destinations and in close proximity to existing public transit stops, which would result in reduced vehicle trips and VMT. The Project would be consistent with and support the goals and benefits of the SCAG 2016 RTP/SCS.

Therefore, construction and operation of the Project would be consistent with State and federal energy standards and would be designed to include numerous energy and waste saving features as well as waste reduction features that would achieve greater energy savings than required. The Project would also be sited in a transportation-efficient location and achieve

reductions in VMT from private automobiles traveling to and from the site consistent with the 2016 RTP/SCS. As a result, impacts would be less than significant.

Wasteful, Inefficient, or Unnecessary Consumption of Energy

Construction

Electricity

Electrical power would be consumed to construct the Project. The demand would be supplied from existing electrical services at the Project Site. Overall, demolition and construction activities would require minimal electricity consumption and would not be expected to have any adverse impact on available electricity supplies and infrastructure. Therefore, impacts on electricity supply and infrastructure associated with short-term construction activities would be less than significant.

Natural Gas

Natural gas is not expected to be consumed in any substantial quantities during construction of the Project. Therefore, Project impacts on energy and gas associated with construction activities would be less than significant.

Transportation Energy

The estimated fuel usage for off-road equipment is based on the number and type of equipment that would be used during construction activities, hour usage estimates, the total duration of construction activities, and hourly equipment fuel consumption factors from the OFFROAD model. On-road equipment would include trucks to haul material to and from the Project Site, vendor trucks to deliver supplies necessary for Project construction, and fuel used for employee commute trips. The estimated fuel usage for on-road trucks is based on the engineering estimates that form the basis of the construction-related impact analyses and fuel consumption information from the CARB on-road vehicle emissions model, EMFAC2014. The number of construction workers that would be required would vary based on the phase of construction and activity taking place. The transportation fuel required by construction workers to travel to and from the Project Site would depend on the total number of worker trips estimated for the duration of construction activity. The estimated fuel usage for construction worker commutes is based on the estimated number of workers for different phases of construction, the average distance that the workers would travel on local and regional roadways from CalEEMod, and emissions factors in the EMFAC2014 model. As shown in Table 4.12-1 in the Draft EIR, on- and off-road vehicles would consume an estimated annual average of 74,754 gallons of diesel fuel for each year of Project construction.

Compliance with the anti-idling regulation and the use of cleaner construction equipment would reduce the Project's annual average diesel fuel usage by approximately 16,624 gallons for each year of Project construction.

As discussed previously, construction of the Project would utilize fuel efficient equipment consistent with state and federal regulations, and would comply with State measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. While these regulations are intended to reduce construction emissions, compliance with the above anti-idling and emissions regulations would also result in energy savings from the use of more fuel-efficient engines. The use of Tier 4 interim engines have shown a 5 percent reduced fuel consumption compared to a Tier 3 engine. Compliance with anti-idling regulations and commitments under PDF AQ-2 to use the newest, cleanest equipment would result in fuel savings that would otherwise have been consumed in the absence of these measures.

In addition, per the City's regulatory requirements, the Project would implement a construction waste management plan to divert mixed construction and demolition debris to City certified construction and demolition waste processors, consistent with the Los Angeles City Council approved Ordinance No. 181519 (LAMC Chapter VI, Article 6, Section 66.32-66.32.5).

Implementation of the construction waste management plan would reduce truck trips to landfills, which are typically located some distance away from City centers, and increase the amount of waste recovered (e.g., recycled, reused, etc.) at material recovery facilities, thereby further reducing transportation fuel consumption.

Based on the available data, construction would utilize energy for necessary on-site activities and to transport construction materials and demolition debris to and from the Site. As discussed above, idling restrictions and the use of cleaner, energy-efficient equipment would result in less fuel combustion and energy consumption and thus minimize the Project's construction-related energy use. Therefore, construction of the Project would not result in the wasteful, inefficient, or unnecessary consumption of energy.

Operation

Electricity

The Project will increase the demand for electricity resources including for water supply, conveyance, distribution, and treatment as compared to the existing commercial use on-site. The Project would result in a projected consumption of electricity totaling approximately 12.94 million kWh per year. The existing restaurant and parking lots use approximately 0.59 million kWh per year. As such, the Project would result in a net new consumption of electricity within the Site of 12.34 million kWh per year. Implementation of PDF AQ-1 would minimize the Project's estimated electricity consumption. For instance, PDF AQ-1 would reduce parking structure lighting energy by approximately 50 percent, which would be expected to achieve savings of approximately 0.19 million kWh per year.

As discussed previously, the Project would comply with or exceed the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance. As specified in PDF AQ-1, the Project would be designed to include numerous energy and waste saving features as well as waste reduction features that would allow the Project to comply with and exceed the Title 24 standards and achieve greater energy savings than required by state regulations. Compliance with the Los Angeles Green Building Program Ordinance would reduce energy and water consumption by incorporating strategies such as low-flow toilets, low-flow faucets, low-flow showers, and other energy and resource conservation measures. The heating, ventilation, and air conditioning (HVAC) system would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency caused by heat loss and heat gain. The Project would also support the recycling and waste diversion goals of the City by incorporating recycling collection areas in the Project design. As such, the Project would minimize energy demand. Therefore, with the incorporation of these features, operation of the Project would not result in the wasteful, inefficient, or unnecessary consumption of electricity.

LADWP forecasts that its peak demand in the 2021-2022 fiscal year, the Project buildout year, would be approximately 23,609 million kWh. The Project's estimated net new electrical consumption would account for approximately 0.052 percent of LADWP's projected electricity sales for the Project's buildout year. Therefore, it is anticipated that the LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand. Thus, the impacts related to electrical supply and infrastructure capacity would be less than significant.

Natural Gas

The Project would increase the demand for natural gas as compared to existing on-site uses. The Project is projected to generate an annual demand for natural gas totaling approximately 20 million kBtu. The Site currently contains a restaurant and surface parking lots that consumes approximately 1.11 million kBtu of natural gas. As such, the Project would result in a net new consumption of natural gas within the Site of 18.89 million kBtu. Natural gas savings from measures specified in PDF AQ-1 cannot readily be quantified due to unavailability of specific data.

As would be the case with electricity, the Project would comply with or exceed the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance to minimize natural gas demand. As specified in PDF AQ-1, the Project would be designed to include numerous energy saving features as well as waste reduction features that would allow the Project to comply with and exceed the Title 24 standards and achieve greater energy savings than required by State regulations. As such, the Project would minimize energy demand. Therefore, with the incorporation of these features, operation of the Project would not result in the wasteful, inefficient, or unnecessary consumption of natural gas.

According to SoCalGas data, natural gas sales have been relatively stable over the past three years with a slight increase from 287 billion cubic feet in 2014 to 294 billion cubic feet in 2016. Based on the Project's estimated natural gas consumption as shown in Table 4.12-2, the Project would account for approximately 0.006 percent of SoCalGas for the Project's buildout year. Therefore, it is anticipated that SoCalGas' existing and planned natural gas supplies would be sufficient to support the Project's demand for natural gas. Therefore, impacts related to natural gas would be less than significant.

Transportation Energy

The Project's estimated operational transportation fuel demand is provided in Table 4.12-2 of the Draft EIR. The Project would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. By locating hotel, retail, and restaurant land uses at an infill location in close proximity to existing off-site commercial, residential, and retail destinations and in close proximity to existing public transit stops, the Project would minimize vehicle trips and VMT. The Project would be consistent with and support the goals and benefits of the SCAG 2016 RTP/SCS. The Project would also include the installation of electric vehicle supply equipment (EVSE) in garages, pursuant to the CALGreen Code. According to the EMFAC2014 model, electric vehicles are predicted to account for approximately 2.1 percent of passenger vehicles in 2022 in the region. The estimated potential fuel savings from EVSE is provided in Table 4.12-2. The estimated fuel savings from the land use characteristics is accounted for in the Project's estimated transportation fuel demand (i.e., without the land use characteristics that reduce VMT, the Project would be expected to result in additional fuel demand equal to the amount quantified in the "Estimated Project Energy Savings" row of Table 4.12-2).

PDF AQ-1 also includes providing easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials such as paper, corrugated cardboard, glass, plastics, metals, and landscaping debris (trimmings), consistent with City of Los Angeles strategies and ordinances, with the goal of achieving 70 percent waste diversion by 2020, and 90 percent by 2025. As such the Project would minimize solid waste generation thereby reducing transportation fuel needed to transport waste to a landfill, although the fuel savings from reduced waste haul trips is not quantified.

Given the evidence presented above, the Project would minimize operational transportation fuel demand consistent with State and City goals. Therefore, operation of the Project would not result in the wasteful, inefficient, or unnecessary consumption of transportation fuel and impacts would be less than significant.

Increase in Demand for Electricity or Natural Gas

The Project's estimated net energy and transportation fuel demand are also provided in Table 4.12-3 of the Draft EIR. To put the Project's net energy and transportation fuel demand into perspective, the values are compared to the energy sales from regional providers and state transportation fuel supplies. The Project would represent a very small fraction of the energy sales from regional providers and state transportation fuel supplies.

Energy demands during the construction of the Project would not represent a substantial fraction of the available energy supply in terms of equipment and transportation fuels and would not substantially affect existing local and regional supply and capacity for the future. Furthermore, construction of the Project would use equipment that would be consistent with the energy standards applicable to construction equipment including limiting idling fuel consumption and using contractors that comply with applicable CARB regulatory standards that affect energy efficiency. Thus, construction of the Project would not conflict with energy standards applicable to heavy-duty construction equipment and associated on-road trucks and vehicles. Because Project construction would entail energy demands largely associated with equipment and transportation fuels, construction of the Project would not increase demands on the electric power network during peak and base period demand periods. As a result, construction energy impacts on supplies and infrastructure would be less than significant.

The Project would comply with or exceed the applicable provisions of the Title 24 standards and the CALGreen Code in effect at the time of building permit issuance. Based on the required load forecast projections by LADWP and SoCalGas, these utilities would be expected to meet the Project's demand and electricity and natural gas services and supply and infrastructure impacts would be less than significant.

With respect to operational transportation-related fuel usage, the Project would support statewide efforts to improve transportation energy efficiency. The Project itself would co-locate complementary hotel, retail, and restaurant land uses on the site. The Project would also be located near major transit facilities, including the Metro Pico light rail station. The proximity to transit and existing off-site uses would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related fuel demand. The Project would also include the installation of EVSE in garages, pursuant to the CALGreen Code. Alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by passengers, would reduce the Project's consumption of gasoline and diesel. According to the EMFAC2014 model, electric vehicles are predicted to account for approximately 2.1 percent of passenger vehicles in 2022 in the region. Nonetheless, electric vehicles would translate to a fuel savings as shown in Table 4.12-3. Plug-in electric vehicles would generally obtain battery power from utility-provided electricity, which are required to provide an increasing share of electricity from renewable sources (i.e., 33 percent by 2020 and 50 percent by 2030) under the State's Renewables Portfolio Standard. Therefore, while plug-in electric vehicles would replace traditional transportation fuels (i.e., gasoline) with utility provided electricity, the electricity would be provided by an increasing share of renewable sources resulting in an overall reduction in energy resource consumption. As discussed above, according to the USEIA's International Energy Outlook 2016, the global supply of crude oil, other liquid hydrocarbons, and biofuels is expected to be adequate to meet the world's demand for liquid fuels through 2040. As the Project would incorporate

characteristics and measures that would reduce transportation fuel usage, the Project energy impacts on transportation fuel supplies and infrastructure would be less than significant.

Cumulative

Electricity

The geographic context for the cumulative analysis of electricity is LADWP's service area. Growth within these geography is anticipated to increase the demand for electricity and the need for infrastructure, such as new or expanded facilities.

Buildout of the Project, the related projects, and additional growth forecasted to occur in the City would increase electricity consumption during Project construction and operation, and may cumulatively increase the need for energy supplies. LADWP forecasts that its peak electricity demand in the 2021-2022 fiscal year, the Project buildout year, would be approximately 23,609 million kWh. As shown in Table 4.12-3, the Project's estimated net new electrical consumption would account for approximately 0.052 percent of LADWP's projected electricity sales for the Project's buildout year.

Future development would result in the irreversible use of electricity resources that could limit future energy availability. However, the utility provider for the Project and related projects have determined that the use of such resources would be minor compared to existing supply and infrastructure within the LADWP service area and would be consistent with growth expectations for LADWP's service area. Furthermore, like the Project, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and State energy standards under Title 24, and incorporate mitigation measures, as necessary. As discussed above and based on evidence from LADWP, the Project would not have a cumulatively considerable impact on existing energy resources either individually or incrementally when considered with the anticipated growth in the service areas. Accordingly, the impacts related to electricity consumption would not be cumulatively considerable, and thus would be less than significant.

Natural Gas

The geographic context for the cumulative analysis of natural gas is the SoCalGas service area. Growth within these geography is anticipated to increase the demand for natural gas and the need for infrastructure, such as new or expanded facilities.

Buildout of the Project and related projects in the SoCalGas service area is expected to increase natural gas consumption and the need for natural gas supplies. According to SoCalGas data, natural gas sales have been relatively stable over the past three years with a slight increase from 287 billion cubic feet in 2014 to 294 billion cubic feet in 2016. Based on the Project's estimated natural gas consumption as shown in Table 4.12-3, the Project would account for approximately 0.006 percent of SoCalGas for the Project's buildout year.

Although future development projects would result in irreversible use of natural gas resources which could limit future availability, the use of such resources would be on a relatively small scale and would consistent with regional and local growth expectations for the SoCalGas service area. Further, like the Project, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and State energy standards of Title 24, and incorporate mitigation measures, as necessary. Therefore, the Project would not have a cumulatively considerable impact related to natural gas consumption, and impacts would be less than significant.

Transportation Energy

Buildout of the Project and related projects in the region would be expected to increase overall VMT; however, the effect on transportation fuel demand would be minimized by future improvements to vehicle fuel economy pursuant to federal and state regulations. By 2025, vehicles are required to achieve 54.5 mpg (based on USEPA measurements), which is a 54 percent increase from the 35.5 mpg standard in the 2012-2016 standards. As discussed previously, the Project would support statewide efforts to improve transportation energy efficiency and would co-locate complementary hotel, retail, and restaurant uses at an infill site near major transit facilities, including the Metro Pico light rail station. Siting land use development projects at infill sites is consistent with the State's overall goals to reduce VMT pursuant to SB 375, and as outline in the 2016 RTP/SCS for the region. Related projects would need to demonstrate consistency with these goals and incorporate project design features or mitigation measures as required under CEQA, which would also ensure related projects contribute to transportation energy efficiency. Furthermore, according to the USEIA's International Energy Outlook 2016, the global supply of crude oil, other liquid hydrocarbons, and biofuels is expected to be adequate to meet the world's demand for liquid fuels through 2040. Therefore, as the Project would incorporate land use characteristics consistent with state goals for reducing VMT, the Project would not have a cumulatively considerable impact related to transportation energy, and impacts would be less than significant.

Project Design Features

PDF AQ-1: Green Building Measures: The Project shall be designed and operated to include energy and resource efficient features that exceed regulatory requirements, which shall include the following:

- The Project shall include easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials such as paper, corrugated cardboard, glass, plastics, metals, and landscaping debris (trimmings).
- The Project shall install energy efficient appliances that meet the 2017 ENERGY STAR® rating standards or equivalent for both hotel and restaurant land uses.
- The Project shall include efficient heating, ventilation, and air conditioning (HVAC) systems (2017 ENERGY STAR® rating standards or equivalent).
- The parking structure shall be designed with occupancy-sensor controlled lighting that places lighting fixtures in a low power state in unoccupied zones.
- To encourage carpooling and the use of electric vehicles by Project employees, guests, and visitors, the Project shall designate a minimum of 5 percent of on-site parking for carpool and/or alternative-fueled vehicles, and the Project design shall provide for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into 10 percent of the parking spaces.

PDF AQ-2: Construction Features: Construction equipment operating at the Project Site will be subject to a number of requirements. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. Construction measures shall include the following:

- The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 interim off-road emissions standards for equipment rated at 50 horsepower (hp) or greater during Project construction. All equipment shall be outfitted with Best Available Control Technology (BACT) devices including a CARB certified

Level 3 Diesel Particulate Filter or equivalent. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.

- Equipment such as tower cranes and welders shall be electric or alternative fueled (i.e., non-diesel). Pole power shall be made available for use with electric tools, equipment, lighting, etc.
- Alternative-fueled generators shall be used when commercial models that have the power supply requirements to meet the construction needs of the Project are readily available from local suppliers/vendors.
- All on-road heavy-duty diesel trucks with a gross vehicle weight rating of 19,500 pounds or greater used at the Project Site shall be engine model year 2012 or later or shall comply with the USEPA 2007 on-road emissions standards.

PDF TRAF-1: Construction Management Plan: A detailed Construction Management Plan shall be submitted to the City's Department of Transportation (LADOT) for review and approval prior to the start of any construction work. The Construction Management Plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. The Construction Management Plan shall formalize how construction shall be carried out and identify specific actions that shall be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following mandatory elements:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Figueroa Street, Flower Street, and Pico Boulevard, to ensure traffic safety on public rights of way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's Figueroa Street, Flower Street and Pico Boulevard driveways.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Sequencing construction activity to reduce the amount of construction-related traffic on arterial streets.
- Contain construction activity within the Project Site boundaries.
- Coordination with LADOT to address any overlapping of construction with the MyFigueroa project.
- Coordination with Metro to address any construction near the railroad right of way.
- Safety precautions for pedestrians and bicyclists through alternate routing and protection barriers/fencing that shall be implemented.
- Scheduling of construction-related deliveries and haul trips so as to occur outside the commuter peak hours.

PDF-WS-1: Water Conservation Features: The Project shall provide the following specific water efficiency features:

- High efficiency waterless hybrid type urinals
- High efficiency water closet with flush volume of 1.1 gallons of water per flush
- ENERGY STAR® certified light commercial clothes washers – water factor of 4.2 or less, with a capacity of 4.5 cubic feet or smaller
- Domestic water heating system located close proximity to point(s) of use
- Cooling tower conductivity controllers or cooling tower pH conductivity controllers
- Water-saving pool filter
- Pool/spa recirculating filtration equipment
- Pool splash troughs around the perimeter that drain back into the pool
- Install a meter on the pool make-up line so water use can be monitored and leaks can be identified and repaired
- Reuse pool backwash water for irrigation
- Leak detection system for swimming pools and spas
- Drip/subsurface irrigation (micro-irrigation)
- Micro-spray
- Proper hydro-zoning/zoned Irrigation (groups plants with similar water requirements together)
- Landscaping contouring to minimize precipitation runoff
- Drought tolerant plants – 70 percent of total landscaping

Conclusion

With the implementation of the Project Design Features identified above and compliance with existing regulations, the Project would not result in significant impacts associated with energy, and no mitigation measures are required.

V. LESS THAN SIGNIFICANT IMPACTS WITH MITIGATION

The EIR determined that the Project has potentially significant environmental impacts in the areas discussed below. The EIR identified feasible mitigation measures to avoid or substantially reduce the environmental impacts in these areas to a level of less than significant. Based on the information and analysis set forth in the EIR, the Project would not have any significant environmental impacts in these areas, as long as all identified feasible mitigation measures are incorporated into the Project. The City again ratifies, adopts, and incorporates the full analysis, explanation, findings, responses to comments, and conclusions of the EIR.

Cultural Resources

Description of Effects

Substantial Adverse Change in the Significance of an Archaeological Resource (CEQA Guidelines § 15064.5)

The Project Site has been previously disturbed by historical grading and building activities. However, as Project implementation would require grading and excavation to greater depths than previously occurred on the Project Site, the possibility exists that previously unknown archaeological resources may be encountered, which is a potentially significant impact. The Project would incorporate MM-CULT-1 to avoid or substantially lessen this environmental effect. In the event of the discovery of previously unknown archaeological resources during construction, implementation of the standard City mitigation measure would reduce potential impacts to a less than significant level.

Directly or Indirectly Destroy a Unique Paleontological Resource or Site or Unique Geologic Feature

The Project Site has been previously graded and developed or paved and does not include any unique geologic features. In addition, no unique geologic features are anticipated to be encountered during Project construction. Therefore, the Project is not expected to directly or indirectly destroy a unique geologic feature. Impacts associated with unique geologic features would be less than significant.

Although the Project Site has been previously disturbed by grading and building activities, Project-related grading and excavation for subterranean parking and building foundations could extend into native soils that might potentially contain paleontological resources, which is a potentially significant impact. The Project would incorporate MM-CULT-2 to avoid or substantially lessen this environmental effect. In the event of the discovery of previously unknown paleontological resources during construction, implementation of the standard City mitigation measures would reduce potential impacts to a less than significant level.

Project Design Features

No project design features are included in the Initial Study with regard to cultural resources.

Mitigation Measures

Mitigation Measure CULT-1: Prior to the issuance of any grading, excavation, or ground disturbance permit, the applicant shall execute a covenant acknowledging and agreeing to comply with all the terms and conditions established herein which shall be recorded in the County Recorder's Office. The agreement (standard master covenant and agreement form CP-6770) shall run with the land and shall be binding on any subsequent owners, heirs or assigns. The agreement with the conditions attached must be submitted to the Development Services Center for approval before being recorded. After recordation, a certified copy bearing the Recorder's number and date shall be provided to the Department of City Planning for retention in the administrative record for Case No. ENV 2016-2594-EIR.

a. All initial grading and all excavation activities shall be monitored by a Project archaeologist. The Project archaeologist shall be present full-time during the initial disturbances of matrix with potential to contain cultural deposits and will document activity.

b. The services of an archaeologist, qualified for historic resource evaluation, as defined in CEQA and Office of Historic Preservation (OHP) Guidelines, shall be secured to implement the archaeological monitoring program. The qualified archaeologist shall be listed, or be eligible for listing, in the Register of Professional Archaeologist (RPA). Recommendations may be obtained by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton.

c. In the event of a discovery, or when requested by the Project archaeologist, the contractor shall divert, direct, or temporarily halt ground disturbing activities in an area in order to evaluate potentially significant archaeological resources.

   i. It shall be the responsibility of the Project archaeologist to: determine the scope and significance of the find; determine the appropriate documentation, preservation, conservation, and/or relocation of the find; and determine when grading/excavation activities may resume in the area of the find.

   ii. Determining the significance of the find shall be guided by California Public Resources Code Division 13, Chapter 1, Section 21083.2, subdivision (g) and (h). If the find is determined to be a "unique archaeological resource", then the applicant, in conjunction with the recommendation of the Project archaeologist, shall comply with Section 21083.2, subdivisions (b) though (f).

   iii. If at any time the Project Site, or a portion of the Project Site, is determined to be a "historical resource" as defined in California Code of Regulations Chapter 3, Article 1, Section 15064.5, subdivision (a), the Project archaeologist shall prepare and issue a mitigation plan in conformance with Section 15126.4, subdivision (b).

   iv. If the Project archaeologist determines that continuation of the Project or Project related activities will result in an adverse impact on a discovered historic resource which cannot be mitigated, all further activities resulting in the impact shall immediately cease, and the Lead Agency shall be contacted for further evaluation and direction.

   v. The applicant shall comply with the recommendations of the Project archaeologist with respect to the documentation, preservation, conservation, and/or relocation of finds.

d. Monitoring activities may cease when:

   i. Initial grading and all excavation activities have concluded; or

   ii. By written consent of the Project archaeologist agreeing that no further monitoring is necessary. In this case, a signed and dated copy of such agreement shall be submitted to the Dept. of City Planning for retention in the administrative record for Case No. ENV 2016-2594-EIR.

e. At the conclusion of monitoring activities, and only if archaeological materials were encountered, the Project archaeologist shall prepare and submit a report of the findings to the South Central Coastal Information Center.

f. At the conclusion of monitoring activities, the Project archaeologist shall prepare a signed statement indicating the first and last date monitoring activities took place, and submit it to the Dept. of City Planning, for retention in the administrative file for Case No. ENV 2016-2594-EIR.

Mitigation Measure CULT-2: If any paleontological materials are encountered during the course of Project development, all further development activity shall halt and the following shall be undertaken:

a. The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology-USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum-who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.

b. The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.

c. The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report.

d. Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.

e. Prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, paleontological reports have been submitted, or a statement indicating that no material was discovered.

f. A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

Finding

With respect to the potential impacts regarding archeological and paleontological resources with the Project, each decision-making body of the City adopts the first possible finding as outlined above in Section III, which states that "changes 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." (CEQA Guidelines Section 15091(a)(1)).

Rationale for Finding

Although the Project Site has been previously disturbed by grading and building activities, Project-related grading and excavation for subterranean parking and building foundations could extend into native soils that might potentially contain unknown archeological or paleontological resources, which is a potentially significant impact. In the event of the discovery of previously unknown resources during construction, implementation of the mitigation measures would reduce potential impacts to a less than significant level.

Reference

For a complete discussion of the Project's impacts associated with archeological and paleontological resources, see Section IV, Cultural Resources, of Appendix A of the Draft EIR.

Hazards and Hazardous Materials

Description of Effects

Reasonably Foreseeable Upset and Accident Conditions Involving the Release of Hazardous Materials into the Environment – Construction – Impacted Soils

Total petroleum hydrocarbons (TPH) and volatile organic compounds (VOCs) were not detected in any of the analyzed soil samples, and VOCs were not detected in any of the soil vapor samples. This indicates that such contaminants are not of concern in the areas assessed. Neither the Phase I Environmental Site Assessment (ESA) nor the Phase II ESA identified other hazardous materials on the Project Site that could not be adequately contained by standard regulatory compliance measures if accidently released during construction. Accordingly, the risk of upset and accident related to hazardous materials is low considering the multiple subsurface investigations of the Project Site and report conclusions regarding environmental concerns.

However, it is possible that previously unknown contamination could be encountered during construction. In the absence of proper handling procedures, soil excavation at the Project Site could expose workers to elevated concentrations of hazardous materials (that were previously unknown) during Project construction. These unforeseen impacts could be potentially significant. Hence, mitigation is provided to ensure proper handling of contaminated soils and reduce the risk of impacts on people, property or the environment. Mitigation measure MM-HAZ-1 requires the preparation and implementation of a site-specific Health and Safety Plan in accordance with federal OSHA regulations. And, MM-HAZ-2 requires the preparation and implementation of a Soil and Groundwater Management Plan that would be implemented prior to and during Project construction. These measures would reduce the probable frequency and severity of consequences to people or property from the accidental release of impacted soils or groundwater. Accordingly, implementation of these mitigation measures would ensure that potential impacts from reasonably foreseeable upset or accident conditions involving the release of contaminated soils or groundwater during Project construction are less than significant.

Cumulative

The Project would adhere to applicable regulatory requirements, incorporate project design features, and provides mitigation measures for site-specific soil conditions. The Phase II ESA did not report subsurface contamination in the areas assessed and MM-HAZ-1 and MM-HAZ-2 ensure that any unknown contamination encountered during construction would be adequately handled. Accordingly, the Project would not individually contribute to an adverse impact related to hazards or hazardous materials.

Generally, the geographic context for cumulative impact analysis of hazards includes the related projects in the vicinity of the Project, that when viewed together with the Project, could incrementally increase a hazards impact to a significant level. As described above, the Phase I ESA identified potentially hazardous conditions located between 0.25- to 1-mile around the Project Site. It concluded that based on distance, topography, gradients, current regulatory status, and the absence of reported releases, none of the sites surrounding the Project Site represent a likely past, present, or material threat of release that could adversely affect the Project Site.

Therefore, the Project would not have a cumulatively considerable hazards or hazards materials impact when viewed together with the potential effects of the related projects. Cumulative impacts are less than significant.

Project Design Features

PDF TRAF-1: Construction Management Plan: A detailed Construction Management Plan shall be submitted to the City's Department of Transportation (LADOT) for review and approval prior to the start of any construction work. The Construction Management Plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. The Construction Management Plan shall formalize how construction shall be carried out and identify specific actions that shall be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following mandatory elements:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Figueroa Street, Flower Street, and Pico Boulevard, to ensure traffic safety on public rights of way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's Figueroa Street, Flower Street and Pico Boulevard driveways.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Sequencing construction activity to reduce the amount of construction-related traffic on arterial streets.
- Contain construction activity within the Project Site boundaries.
- Coordination with LADOT to address any overlapping of construction with the MyFigueroa project.
- Coordination with Metro to address any construction near the railroad right of way.
- Safety precautions for pedestrians and bicyclists through alternate routing and protection barriers/fencing that shall be implemented.
- Scheduling of construction-related deliveries and haul trips so as to occur outside the commuter peak hours.

Mitigation Measures

MM-HAZ-1: Prior to the issuance of a grading permit, the construction contractor shall demonstrate that they have retained a qualified environmental professional to prepare and implement a site-specific Health and Safety Plan in accordance with the performance standards and implementation requirements of the federal OSHA regulations (29 CFR 1910.120) and Cal/OSHA regulations (8 CCR Title 8, Section 5192). The Health and Safety Plan shall be submitted to the City for review and approval. The Health and Safety Plan shall include all required measures to protect construction workers and the general public potentially exposed to hazardous materials by including engineering controls, monitoring, and security measures to prevent unauthorized entry to the construction area and to reduce hazards outside of the construction area. If prescribed contaminant exposure levels or the performance standards in the Health and Safety Plan are exceeded, personal protective equipment shall be required for

workers, and remedial actions taken, in accordance with state and federal regulations. The plan shall include designated personnel responsible for implementation of the Health and Safety Plan. Submittal of the Health and Safety Plan to the City shall not be construed as approval of the adequacy of the contractor's health and safety professional, the contractor's plan, or any safety measure taken in or near the construction site. The contractor shall be solely and fully responsible for compliance with all laws, rules, and regulations applicable to health and safety during the performance of the construction work.

MM-HAZ-2: The construction contractor shall retain and consult a qualified environmental professional if contaminated soil is identified during construction activities. The construction contractor shall comply with and enforce the applicable provisions of the Health and Safety Plan to determine the proper handling, storage, and disposal procedures for any contaminated soils or materials discovered during construction.

Finding

With respect to the potential impacts regarding previously unknown contamination during construction associated with the Project, each decision-making body of the City adopts the first possible finding as outline above in Section III, which states that "changes 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." (CEQA Guidelines Section 15091(a)(1)).

Rationale for Finding

The risk of upset and accident conditions related to hazardous materials release during construction is low based on the results of the multiple subsurface investigations performed on the Project Site. Specifically, the Phase I ESA and Phase II ESA completed for the Project did not identify hazardous materials on the Project Site that could not be adequately contained by standard regulatory compliance measures if accidently released during construction.

Nevertheless, because it is possible that previously unknown contamination could be encountered during construction, MM-HAZ-1 and MM-HAZ-2 will be incorporated into the Project to avoid or substantially lessen the probable frequency and severity of consequences to people or property from accidental release of impacted soils or groundwater. Mitigation measure MM-HAZ-1 requires the preparation and implementation of a site-specific Health and Safety Plan in accordance with federal OSHA regulations. And, MM-HAZ-2 requires the preparation and implementation of a Soil and Groundwater Management Plan that would be implemented prior to and during Project construction.

Project demolition, construction and improvements would also comply with existing regulations that govern water quality, treatment of soils, asbestos, lead-containing materials, PCBs, and other potentially hazardous materials during construction to ensure that impacts would be less than significant.

Reference

For a complete discussion of the Project's impacts associated with hazards and hazardous materials, see Section 4.5, Hazards and Hazardous Materials, of the Draft EIR.

Noise

Description of Effects

Noise Levels In Excess of Applicable Standards - Operation

Hotel A/B Tower's 8th Floor Landscaped Pool Deck

Hotel A/B Tower's 8th floor would include a landscaped pool deck, a kitchen and hotel guest dining area, and a fitness center. The analysis in the Draft EIR assumed that the landscaped pool deck would be planned to host music and entertainment during the daytime and nighttime until 2:00 A.M. The dominant sources of noise would include noise generated by human conversation and from the use of amplified speakers. The nearest noise-sensitive uses to the 8th floor landscaped pool deck are the Circa project residences currently under construction at 1200 S. Figueroa Street (receptor R5), approximately 25 feet north of the Project Site and the City Lights on Fig residences (receptor R7), approximately 120 feet south of the Project Site.

Under the conservative scenario analyzed in the Draft EIR, there could be up to approximately 895 visitors to the landscaped pool deck at one time on a peak weekend day. Visitors would be located throughout the landscaped pool deck with approximately half of the visitors expected to be in or around the pool and the other half within the lounge seating areas. Assuming up to approximately 500 visitors talking simultaneously, the continuous noise level would be up to 81.8 dBA at a reference distance of 3 feet. The landscaped pool deck area would also include the use of amplified speakers for music and entertainment. For music and entertainment purposes, amplified speakers in a dance club setting can expose persons within the dance club to noise levels ranging from 84 dBA to 104 dBA. The primary speakers would be arranged around the pool area to provide music and entertainment for visitors. Secondary or smaller speakers would be provided in the lounge seating areas. The Draft EIR conservatively assumed the amplified speakers would generate a noise environment of 104 dBA at the south end of the landscaped pool deck near the pool area, the combined noise from amplified speakers and visitors talking could potentially exceed the significance threshold of 5 dBA over ambient noise levels per LAMC at receptor R5 and would be very close to exceeding the threshold at receptor R7. Therefore, impacts would be potentially significant and mitigation measures would be required.

Hotel A/B Tower's 41st Floor Rooftop Pool Deck

Hotel A/B Tower's 41st floor would contain an open-air landscaped pool deck containing a bar for Hotel A/B. The Draft EIR assumed the rooftop pool deck would be planned to host music and entertainment during the daytime and nighttime until 2:00 A.M. The dominant sources of noise would include noise generated by human conversation and from the use of amplified speakers. The nearest noise-sensitive uses to the 41st floor rooftop pool deck are the Circa project residences currently under construction (Receptor R5) located approximately 25 feet north of the Project Site. The Circa project residences are located in two 36-story towers. While there would be some elevation difference between these towers and the Hotel A/B Tower's 41st floor, for the purposes of this noise assessment, the noise level from the Hotel A/B Tower's 41st floor is evaluated assuming equivalent building heights (direct line of sight) and does not account for the attenuation effects of sound traveling an additional 60 feet in between the noise source and noise-sensitive receptor. Under a conservative scenario, there could be up to approximately 355 visitors to the pool deck at a time on a peak weekend day. Visitors would be located throughout the rooftop pool deck with the majority of the visitors expected to be in or around the pool area and nearby lounge seating areas. As shown in Figure 2-6 (refer to Chapter 2, Project Description, of this Draft EIR), the pool would be located at the northern end of the rooftop pool deck area. Lounge seating would be located throughout the outdoor areas of the rooftop pool

deck. Noise from human conversation is approximately 55 dBA at a distance of 3 feet. Assuming up to approximately 200 visitors talking simultaneously, the continuous noise level would be up to approximately 78 dBA at 3 feet. In addition, for the purposes of this analysis, in order to estimate expected maximum visitor noise conditions, it is assumed that visitors would be grouped approximately 25 feet from the northern perimeter rails (i.e., near the pool area) and within the lounge seating areas adjacent to the bar area. The estimated visitor noise is combined with the amplified speakers, discussed below, to determine the maximum combined noise from the rooftop pool deck.

The 41st floor landscaped pool deck area would include the use of amplified speakers for music and entertainment. As discussed previously for the 8th floor landscaped pool deck, amplified speakers in a dance club setting can expose persons within the dance club to noise levels ranging from 84 dBA to 104 dBA, with the upper end of this range primarily attributed to clubs with dance floors (typically 94 dBA and higher). As discussed previously, the noise level range depends on many factors including the volume setting of the equipment, the orientation of the speakers, physical separation distance from the speakers to receptors, and whether screens, pillars or other barriers shield or partially shield the speaker noise. The primary speakers would be arranged around the pool area to provide music and entertainment for visitors. Secondary or smaller speakers would be provided in the lounge seating areas. Assuming the amplified speakers generate a noise environment of 94 dBA near the pool area without a dedicated dance floor, the combined noise from amplified speakers and visitors talking at receptor R5, when combined with ambient noise would be 75.4 dBA during the daytime and 65.6 dBA during the nighttime, which is slightly less than the values shown in Table 4.8-12, and generally an expected result given that this space would be smaller compared to the 8th level landscaped pool deck and have a smaller visitor capacity. Nonetheless, the nighttime noise level would potentially exceed the significance thresholds of 5 dBA over ambient noise levels per LAMC at receptor R5 during the nighttime hours. Therefore, impacts would be potentially significant and mitigation measures would be required. Furthermore, at this location, given the height of the 41st level, the noise from the rooftop pool deck would not substantially combine with the ground-level or near-ground level on-site Project noise sources and would not substantially contribute to Project composite noise sources.

Composite Noise Level Impacts from Project Operations

The threshold of significance for composite noise levels (on-site and off-site sources) is based on the LA CEQA Thresholds Guide, and the threshold is stated as an increase in the ambient noise level of 3 dBA or 5 dBA CNEL (depending on the existing conditions at the affected noise sensitive land use) for the Project's composite noise (both project-related on-site and off-site sources) at affected uses.

An evaluation of the combined noise levels from the Project's various operational noise sources (i.e., composite noise level) was conducted to conservatively ascertain the potential maximum Project-related noise level increase that may occur at the noise sensitive receptors considered in this analysis. Operational noise sources associated with the Project include loading area activities, refuse collection areas, parking structure, traffic on nearby roadways, on-site mechanical equipment, and open space related activities.

Based on a review of the noise sensitive receptors and Project noise sources, the only existing noise sensitive locations at which composite noise impacts could occur are the Circa project residences (receptor R5) approximately 25 feet north of the Project Site and the Gilbert Lindsay Plaza (receptor R2) approximately 120 feet west of the Project Site. For the reasons discussed above, the predominant Project noise source that could potentially affect receptor R5 and R2 would be loading area activities, refuse collection activities, parking structures, traffic on nearby

roadways, on-site mechanical equipment, and open space related activities, including the use of amplified speakers.

The composite noise could potentially exceed the significance threshold of 3 dBA CNEL over ambient CNEL noise levels at receptor R5 and receptor R2, primarily as a result of maximum potential open space noise. Therefore, impacts would be potentially significant and mitigation measures would be required.

Implementation of MM-NOISE-4, MM-NOISE-5, and MM-NOISE-6 would establish performance standards for the open space areas where amplified speakers for music and entertainment would be used and where visitors would congregate. The performance standards require an acoustical design plan that meets quantitative standards that would ensure noise levels would be controlled to below the significance thresholds. Implementation of these mitigation measures would reduce the Project's noise levels to below the significance thresholds.

Groundborne Vibration – Human Annoyance – Construction

The closest vibration sensitive land use located in the Project Site vicinity is the Circa project (receptor R5) located north of the Project Site and currently under construction. Vibration levels exceeding 72 VdB would be considered distinctly perceptible for "Frequent Events." The Circa project could be exposed to vibration levels of 87 VdB from the use of large bulldozers or other similarly large vibration-generating equipment, which would exceed the FTA's 72 VdB threshold. Thus, vibration impacts related to human annoyance would be potentially significant at this receptor. With implementation of MM-NOISE-3, which would restrict the use of large bulldozers or other similarly large vibration-generating equipment near vibration-sensitive uses, this impact would be reduced to less than significant. All other sensitive receptors in the Project vicinity are too distant to be affected by vibration from Project construction.

With respect to haul truck trips, while loaded on-road rubber-tired haul trucks traveling on uneven roads could potentially generate transitory vibration, impacts to vibration-sensitive uses would not occur because the City would require haul trucks to utilize a designated haul route that restricts haul trucks from traveling on roadways near vibration-sensitive uses, such as residential neighborhoods. Furthermore, the Project would implement PDF TRAF-1 and prepare a detailed Construction Management Plan, which will include information about haul routes and the location of any roadway or sidewalk closures, traffic detours, and hours of construction. Compliance with City haul route requirements and implementation of PDF TRAF-1 would ensure haul truck vibration impacts with respect to human annoyance would be less than significant at residences and buildings where people normally sleep, in accordance with the FTA guidelines.

With implementation of MM-NOISE-3, which prohibits the use of large bulldozers and other similar vibration-generating heavy equipment greater than 300 horsepower within 80 feet of existing residential structures, the noise and vibration levels during construction would be reduced below the applicable threshold. Therefore, Project construction would not result in the exposure of persons to excessive groundborne noise or vibration and impacts would be less than significant with mitigation.

Permanent Increase in Ambient Noise Levels in the Project Vicinity

Project operations would potentially result in a substantial permanent increase in ambient noise levels at the sensitive receptors in the Project vicinity, as measured against applicable regulations including LAMC standards for ambient noise levels and DHS CNEL standards for normally acceptable noise increase for the residential and commercial land uses. This includes operational noise generated by Project-related traffic noise on surrounding roadways under

baseline existing and future conditions, impacts from on-site stationary noise sources including upper-story open space decks and rooftops, fixed mechanical equipment, loading deck areas, refuse collection areas, the parking structure, and composite noise level impacts considering all Project operational sources combined.

Therefore, the Project would have a potentially significant impact related to a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project and mitigation measures would be required. With implementation of MM-NOISE-4, MM-NOISE-5, and MM-NOISE-6, these impacts would be reduced to less than significant.

Cumulative Impacts

The LAMC-required provisions that limit stationary source noise from equipment such as rooftop mechanical equipment would ensure that noise levels would be less than significant at the property line for each related project. In addition, the types of on-site noise generated by each related project in the vicinity would be similar to noise from mixed-use multi-family residential projects that do not include substantial operational on-site noise generators. It follows that operational noise levels from the related projects would not be substantial considering the ambient noise levels in the surrounding urban environment. Further, noise from other stationary sources, including parking structures, open space activity and loading docks would be limited to areas in the immediate vicinity of each related project. The Project includes mitigation measures to reduce operational noise levels below a level of significance. And, there are no substantial on-site noise generators associated with the related projects that could combine with the on-site operational noise of the Project to create a cumulatively considerable significant impact As such, the Project's composite stationary source impacts considered together with potential operational noise from the related projects would be less than significant and would not result in a significant cumulative stationary source noise impacts.

Project Design Features

PDF NOISE-1: Prohibition of Idling: The Project shall not allow delivery truck idling of main engines in the loading area pursuant to applicable City and State standards. Signs shall be posted prohibiting idling.

Mitigation Measures

MM-NOISE-4: Perimeter railing with solid wall panels (glass, metal, masonry or similar) shall be installed along the outer edge of the pool deck areas on the 8th floor landscaped pool deck and the 41st floor rooftop pool deck on the Hotel A/B Tower. The railing shall be a minimum of 42 inches high and have no gaps between each panel or between the panel and floor, unless required by building code, wind load resistance standards, or other applicable standards. In such cases, gaps shall be kept to the minimum necessary to meet applicable code and standards.

MM-NOISE-5: Prior to operating outdoor amplified music and entertainment speakers on the 8th floor landscaped pool deck of the Hotel A/B Tower, an acoustical design plan shall be submitted to the City, shown to result in a pool deck composite noise level at the south end perimeter rail of no more than 98 dBA Leq and at the north end of the perimeter rail of no more than 65 dBA Leq. The pool deck composite noise level is defined as the sound level resulting from the amplification of recorded or live music combined with simultaneous spoken word (i.e., D.J.) emanating from all speakers in use, and excluding noise from guests and the normal operation of the amenities lounge, food and beverage service. To achieve this performance level, the acoustical design plan may rely on, among other strategies and technologies the following:

- Directional speakers or arrays of smaller speakers shall be used so as to maximize on-site sound levels while minimizing the spread of sound beyond the pool deck perimeter. For example, within the pool area southwest of the amenities lounge, speakers placed around the pool should be directed towards the pool. Speakers located southwest of the pool shall be angled towards the pool or amenities lounge. Sound from all speakers shall be directed below the top of the railing (if necessary, downward tilted at an appropriate angle). All ceiling-mounted speakers shall be oriented directly downward towards the floor.

- Within the outdoor seating areas northeast of the amenities lounge, speakers shall be generally directed towards the interior of the property. Sound from all speakers shall be directed below the top of the railing (if necessary, downward tilted at an appropriate angle). All ceiling-mounted speakers shall be oriented directly downward towards the floor.

- The areas shall be designed with the strategic use of materials with high sound absorption properties within the pool deck area and shall avoid using highly sound-reflective surfaces, to the extent possible, at the amenities lounge.

- The use of amplified speakers for recorded or live music performances shall be limited to up to 2:00 A.M.

- All disc jockeys (DJs) and musicians shall utilize the on-site sound system. The DJs and musicians shall use speakers set at or below pre-approved settings and in predetermined speaker locations and directions.

MM-NOISE-6: Prior to operating outdoor amplified music and entertainment speakers on the 41st floor rooftop pool deck of the Hotel A/B Tower, an acoustical design plan shall be submitted to the City, shown to result in a pool deck composite noise level of no more than 90 dBA Leq at the perimeter rail. The pool deck composite noise level is defined as the sound level resulting from the amplification of recorded or live music combined with simultaneous spoken word (i.e., DJ) emanating from all speakers in use, and excluding noise from guests and the normal operation of the amenities lounge, food and beverage service. To achieve this performance level, the acoustical design plan may rely on, among other strategies and technologies the following:

- The use of directional speakers or arrays of smaller speakers so as to maximize on-site sound levels while minimizing the spread of sound beyond the pool deck perimeter. For example, speakers placed around the rooftop area should be directed towards the interior of the space, such as towards the pool and seating areas. Speakers located southwest of the pool shall be angled towards the pool or amenities lounge. Sound from all speakers shall be directed below the top of the railing (if necessary, downward tilted at an appropriate angle). All ceiling-mounted speakers shall be oriented directly downward towards the floor.

- The area shall be designed with the strategic use of materials with high sound absorption properties within the pool deck area and shall avoid using highly sound-reflective surfaces, to the extent possible, at the bar, restroom, and elevator/stairwell walls.

- The use of amplified speakers for recorded or live music performances shall be limited to up to 2:00 A.M.

- All disc jockeys (DJs) and musicians shall utilize the on-site sound system. The DJs and musicians shall use speakers set at or below pre-approved settings and in predetermined speaker locations and directions.

Finding

With respect to the potential impacts outlined above regarding the operation of the landscaped pool decks on Hotel A/B's 8th and 41st floors, composite noise levels from operations, human annoyance from groundborne vibration during construction, permanent increase in ambient noise levels in the vicinity of the Project, and cumulative impacts, each decision-making body of the City adopts the first possible finding as outline above in Section III, which states that "changes 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." (CEQA Guidelines Section 15091(a)(1)).

Rationale for Finding

Under the conservative approach used in the Draft EIR, impacts associated with the operation of the landscaped pool decks on Hotel A/B Tower's 8th and 41st floors could potentially exceed the significance threshold of 5 dBA over ambient noise levels per LAMC at receptor R5 and could be very close to exceeding the threshold at receptor R7 on the 8th floor. Mitigation Measures NOISE 4, 5 and 6 would be incorporated into the Project to mitigate operational noise impacts and would avoid or substantially lessen these environmental effects. MM NOISE-4 requires the perimeter railing on the outer edge of the landscaped pool decks to be designed with solid wall panels and be a minimum of 42 inches high. Individual acoustical design plans with specific performance standards must be submitted to the City for the landscaped pool decks, as required by MM NOISE 5 and 6. As such, impacts would be less than significant.

Similarly, the conservative analysis of the operational composite noise levels (project-related on-site and off-site sources) discussed in the Draft EIR found that potentially significant noise impacts could occur a sensitive receptors R2 and R5. MM-NOISE 4, 5 and 6 would be incorporated into the Project to mitigate operational noise impacts and would avoid or substantially lessen these noise impacts. Impacts would be less than significant.

The Circa Project could be exposed to vibration levels of 87 VdB from the use of large bulldozers or other similarly large vibration-generating equipment, which would exceed the FTA's 72 VdB threshold and could result in a significant impact. MM-NOISE-3 would be incorporated into the Project to restrict the use of large bulldozers and other similar vibration-generating heavy equipment greater than 300 horsepower within 80 feet of vibration-sensitive uses. This would avoid or substantially reduce this impact at the Circa Project. All other sensitive receptors in the Project vicinity are too distant to be affected by vibration from Project construction. Therefore, Project construction would not result in the exposure of persons to excessive groundborne noise or vibration and impacts would be less than significant with mitigation.

Project operations would result in a substantial permanent increase in ambient noise levels at the sensitive receptors in the Project vicinity, as measured against applicable regulations including LAMC standards for ambient noise levels and DHS CNEL standards for normally acceptable noise increase for the residential and commercial land uses. This increase in Project-related ambient noise levels includes noise increases from the upper-story open space decks and rooftops. Other operational noises including those from traffic noise on surrounding roadways under baseline existing and future conditions, fixed mechanical equipment, loading deck areas, refuse collection areas, the parking structure, and composite noise level impacts would be less than significant at nearby sensitive receptor locations as shown in Table 4.8-17 in the Draft EIR. The Project incorporates MM-NOISE-4, MM-NOISE-5, and MM-NOISE-6, which avoid or substantially lessen this significant environmental effect. Impacts would be reduced to less than significant.

Reference

For a complete discussion of the Project's impacts associated with noise, see Section 4.8, Noise, of the Draft EIR.

Transportation and Traffic

Description of Effects

Conflict with Applicable Plan, Ordinance, Policy -- Future with Project Conditions (1 Intersection)

The Draft EIR found the Project's incremental increase in the V/C ratios at 25 of the 29 study intersections would be less than significant during the peak hours under Future With Project Conditions. However, the Project would cause a significant impact at intersection 13. Figueroa Street & W. 11th Street at A.M. and P.M. peak hours. The feasible mitigation program for the Project that quantitatively reduced significant impacts includes: (1) implementation of a TDM program for the Project Site to promote peak period trip reduction; and (2) Transportation Systems Management (TSM) improvements, including signal controller upgrades at key intersections within the Study Area. These mitigation measures are consistent with Transportation Impact Study Guidelines and the City's goals to reduce greenhouse gas emissions by reducing the use of single-occupant vehicle trips, encourage developers to construct transit and pedestrian-friendly projects with safe and walkable sidewalks, and promote other modes of travel.

The mitigation program would result in peak hour trip reductions from implementation of the TDM program and operation improvements as a result of the TSM improvements.

As discussed in detail in the Draft EIR and the Traffic Study, Appendix K to the Draft EIR, the proposed mitigation measures reduced impacts to less than significant levels at this impacted intersection.

Project Design Features

No project design features are included in the EIR for the above-references thresholds of significant with regard to transportation and traffic.

Mitigation Measures

MM-TRAF-1 (Transportation Demand Management Program): A Transportation Design Management (TDM) program shall be prepared to reduce the use of single occupant vehicles (SOV) during commute hours by increasing the number of trips by walking, bicycle, carpool, vanpool and transit.

A preliminary TDM program shall be prepared and provided for LADOT review prior to the issuance of the first building permit for this Project and a final TDM program approved by LADOT is required prior to issuance of the first certificate of occupancy for the Project. As recommended by the transportation study, the TDM program shall include, but is not limited to, the following:

- Provide a transportation information center and on-site TDM coordinator to educate employers, employees, hotel guests, and customers of surrounding transportation options

- Promote bicycling and walking through amenity upgrades such as exclusive access

points, secured bicycle parking, sidewalk pavement improvements, wayfinding signage, etc. around the Project Site

- Promote and support carpool/vanpool/rideshare use through parking incentives and administrative support

- Incorporate incentives for using alternative travel modes

- Support existing and/or future efforts by LADOT for Mobility Hubs by providing amenities such as bicycle parking, rentals, shared vehicle rentals, transit information, etc. at the Project Site (subject to design feasibility)

- Make a one-time fixed-fee financial contribution of $100,000 to the City's Bicycle Plan Trust Fund to implement bicycle improvements in the general Downtown Los Angeles area of the Project

MM-TRAF-2 (Transportation Systems Management Improvements): The Project shall contribute up to $30,000 toward Transportation Systems Management (TSM) improvements that would better accommodate intersection operations and increase intersection capacity throughout the study area. LADOT's ATSAC Section has identified the following upgrades as part of the TSM improvements:

- Fiber optic upgrades along South Figueroa Street from Pico Boulevard to Olympic Boulevard for ($20,000)

- Two CCTV camera upgrades at Pico Boulevard and Figueroa St, and LA Live Way and Pico Boulevard ($10,000)

These upgrades would improve the network capacity for real-time video monitoring of intersection, corridor, transit, and pedestrian operations in Downtown Los Angeles by reducing delays experienced by motorists at study intersections.

A final determination on how to implement these CCTV installations will be made by LADOT prior to the issuance of the first building permit. These installations will be implemented either by the Applicant through the B-Permit process of the Bureau of Engineering (BOE), or through payment of a one-time fixed fee of $30,000 to LADOT to fund the cost of the upgrades. If LADOT selects the payment option, then a required payment of $30,000 shall be provided to LADOT, and LADOT shall design and construct the upgrades.

If the installations are implemented by the Applicant through the B-Permit process, then these improvements must be guaranteed prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy. Temporary certificates of occupancy may be granted in the events of any delay through no fault of the Applicant, provided that, in each case, the Applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT.

Finding

With respect to the potential impacts regarding future with Project conditions at intersection 13. Figueroa Street & W. 11th Street at A.M. and P.M. peak hours, each decision-making body of the City adopts the first possible finding as outline above in Section III, which states that "changes 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." (CEQA Guidelines Section 15091(a)(1)).

Rationale for Finding

As discussed in more detail in the Draft EIR, the Project's incremental increase in the V/C ratios at intersection 13. Figueroa Street & W. 11th Street during A.M. and P.M. peak hours would cause a significant impact. The Project would incorporate MM-TRAF-1 and MM-TRAF-2 to avoid or substantially lessen this environmental effect. The mitigation program for the Project at this intersection includes: (1) implementation of a TDM program for the Project Site to promote peak period trip reduction; and (2) Transportation Systems Management (TSM) improvements.

The TDM program details a set of strategies proposed for the Project designed to reduce peak hour vehicular traffic to and from the Project Site. It is a comprehensive program of design features, transportation services, education programs, and incentive programs intended to reduce the impact of traffic from employees and visitors to the Project Site during the most congested periods of the day. The combined effect of the strategies implemented as part of the TDM program would result in a reduction in peak hour trip generation by offering services, actions, specific facilities, incentives, and contributions, aimed at encouraging use of alternative transportation modes (e.g., transit, bus, walking, bicycling, carpool, etc.). Trip Generation Handbook, 3rd Edition provides a summary of research of TDM programs at many different sites. At places that had the most comprehensive programs, including both economic incentives (e.g., transit passes, etc.) and support services, the programs resulted in an average 24 percent reduction in commuter vehicles. Thus, as an achievable but conservative estimate, an overall TDM trip reduction credit of 10 percent was assumed.

In addition, the Project would contribute funding toward TSM improvements that would better accommodate intersection operations and increase intersection capacity. LADOT has determined that TSM improvements would improve traffic operations and increase intersection capacity by approximately 1 percent along a corridor. The funding provided as part of the mitigation would be used by LADOT to implement the TSM improvements and thereby reduce impacts at identified intersections. The TSM improvements would target the Figueroa Street corridor, as well as the intersection of LA Live Way & W. Pico Boulevard.

The mitigation program would result in peak hour trip reductions at this intersection from implementation of the TDM program and operation improvements as a result of the TSM improvements, as shown in Table 13 of Appendix K, Traffic Study to the Draft EIR. The proposed mitigation measures reduced impacts to less than significant levels at this impacted intersection.

Reference

For a complete discussion of the Project's impacts associated with transportation and traffic, see Section 4.10, Transportation and Traffic, of the Draft EIR.

VI. SIGNIFICATION AND UNAVOIDABLE IMPACTS

The Final EIR determined that the environmental impacts set forth below are significant and unavoidable. In order to approve the project with significant unmitigated impacts, the City is required to adopt a Statement of Overriding Considerations, which is set forth in Section X below. No additional environmental impacts other than those identified below will have a significant effect or result in a substantial or potentially substantial adverse effect on the environment as a result of the construction or operation of the project. The City finds and determines that:

a) All significant environmental impacts that can be feasibly avoided have been eliminated, or substantially lessened through implementation of the project design features and/or mitigation measures; and

b) Based on the Final EIR, the Statement of Overriding Considerations set forth below, and other documents and information in the record with respect to the construction and operation of the project, all remaining unavoidable significant impacts, as set forth in these findings, are overridden by the benefits of the project as described in the Statement of Overriding Considerations for the construction and operation of the project and implementing actions.

Noise

Description of Effects

Conflict with Applicable Standards – Construction

As shown in Table 4.8-8 and Table 4.8-9 of the Draft EIR construction noise levels are estimated to reach a maximum of 89 dBA Leq at sensitive receptor R5 (the under-construction Circa project), which exceeds the maximum allowable LAMC increase at this location (the ambient noise level of 75.0 dBA Leq plus 5 dBA Leq); a maximum of 77 dBA Leq at sensitive receptor R2 (Gilbert Lindsay Plaza), which exceeds the maximum allowable LAMC increase at this location (the daytime noise level of 65.6 dBA Leq plus 5 dBA Leq); and a maximum of 77 dBA Leq at sensitive receptor R7 (the City Lights on Fig Apartments), which exceeds the maximum allowable LAMC increase at this location (the daytime noise level of 71.9 dBA Leq plus 5 dBA Leq). Therefore, the Project would have potentially significant construction noise impacts at these three sensitive receptors if no mitigation was applied.

The Final EIR requires implementation of mitigation measures MM-NOISE-1 and MM-NOISE-2 listed below. Due to the design of the adjacent uses and projects, and the proposed excavation of the Project Site, the physical condition during construction would be the 15-foot tall construction fence abutting an approximately 90-foot-high podium structure at the Circa project, and the same fence heights facing other adjacent uses identified as receptors above. Consequently, the 15-foot tall construction fence mitigates noise impacts at grade and above to the fence height, but would have minimal ability to reduce noise between the Project Site and sensitive receptor locations that are substantially above grade level (plus 15 feet) because the sound barrier construction fence would not directly block line of sight. Accordingly, the EIR concludes and the City finds that although temporary construction noise would attenuate with the increased distance between the noise sources on the Project Site, and feasible mitigation has been applied, the Project would still result in temporary noise impacts that are considered significant and unavoidable.

Cumulative Impacts – Construction

For cumulative noise impacts, the Draft EIR identified related projects that are located in the vicinity of the Project Site and are capable of having combined noise impacts. Because the timing of the construction activities for related projects cannot be defined specifically and is beyond the control of the City and the Applicant, the Draft EIR's quantitative analysis conservatively assumed multiple concurrent construction projects could have significant cumulative noise impacts on identified receptor locations.

The Draft EIR also disclosed that related project construction noise levels would be intermittent, short-term (ceasing at the end of the construction phase), and would comply with time

restrictions and other relevant provisions of the LAMC. Noise associated with construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual project and compliance with the City's noise ordinances. However, such measures would only reduce noise to a degree that is technically feasible. Therefore, even with implementation of design features and mitigation measures, the Draft EIR conservatively concluded that if identified related projects are constructed concurrently with the Project, that could result in exposure of persons to or generation of noise levels in excess of standards established by the City or result in a substantial temporary or periodic increase in ambient noise levels in the vicinity of the Project Site above levels existing without the Project and related projects. Hence, the Draft EIR concluded and the City finds that temporary cumulative construction noise impacts are significant and unavoidable.

Project Design Features

PDF NOISE-1: Prohibition of Idling: The Project shall not allow delivery truck idling of main engines in the loading area pursuant to applicable City and State standards. Signs shall be posted prohibiting idling.

Mitigation Measures

MM-NOISE-1: The Project shall provide a temporary 15-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 10 dBA between the Project construction site and the Gilbert Lindsay Plaza (receptor R2) to the west and between the Project construction on-site and residential uses at the Circa project (receptor R5) to the north. Temporary noise barriers shall be used to block the ground level line-of-sight between the construction equipment and the noise sensitive receptors during early Project construction phases (up to the start of framing) when the use of heavy equipment is prevalent.

MM-NOISE-2: The Project contractor(s) shall employ state-of-the-art noise minimization strategies when using mechanized construction equipment capable of achieving at least a 2 dbA noise reduction. The contractor(s) shall limit unnecessary idling of equipment on or near the site in compliance with the California Air Resources Board Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling (Title 13 California Code of Regulations, Section 2485). The contractor(s) shall place noisy construction equipment as far from the Project Site edges as practicable taking into consideration closeness to sensitive receptors and the location of the construction activity on the Project Site. The Project contractor(s) shall equip all construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards that achieve at least a 2 dBA reduction in equipment engine noise levels as compared to the same equipment without noise mufflers. Absorptive mufflers capable of achieving at least a 2 dBA noise reduction are considered commercially available and state-of-the-art noise reduction for heavy duty equipment.

MM-NOISE-3: Heavy equipment, such as use of a large bulldozer (greater than 300 horsepower), and other similarly large vibration-generating equipment shall not be used within 80 feet of the neighboring residential structures. If such proximate construction is required, alternative equipment and methods such as small bulldozers (less than 300 horsepower), shall be used to ensure that vibration effects on adjacent residential uses would result in maximum vibration levels of less than 72 VdB at the Circa project (receptor R5) north of the Project Site.

Finding

Each decision making body of the City finds that all feasible mitigation measures to substantially reduce or avoid the project's construction noise impact and the project's contribution to cumulative construction noise impacts have been incorporated into the project.

In accordance with CEQA Guidelines Section 15091, the City finds that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen these significant environmental impacts. The City also finds that specific economic, legal, social, technological or other considerations, including provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or project alternatives identified in the Final EIR. However, while implementation of mitigation measures will reduce the impacts, the project's construction noise impact, and the project's contribution to cumulative construction noise impacts, will be significant and unavoidable.

Rationale for Finding

The Draft EIR concluded that the Project would have significant and unavoidable project-specific and cumulative construction noise impacts. The ambient noise conditions are heavily influenced by high intensity urban uses and large scale ongoing construction projects adjacent to and around the Project Site. This environmental setting contributes to the significant noise impacts associated with the Project. Implementation of mitigation measures would reduce the project's construction noise impacts from onsite activities to the extent feasible. While it is anticipated that nearby related projects would similarly implement mitigation measures to address potential noise impacts from construction activities, potential cumulative impacts would exist as a result of construction of the project and nearby related projects. Therefore, project specific and cumulative construction noise impacts from onsite activities would be significant and unavoidable.

Reference

For a complete discussion of the project's impacts associated with noise, see Section 4.8, Noise, and Appendix I, Noise Technical Report, of the Draft EIR.

Transportation and Traffic

Description of Effects

Conflict with Applicable Plan, Ordinance or Policy – Cumulative Construction

Impacts on traffic associated with construction are typically considered short-term adverse impacts; and construction worker and haul truck trips would occur outside of the commuter morning and afternoon peak hours and thus the number of trips independently from the Project would not result in significant traffic impacts. However, lane closures adjacent to the Project Site would result in significant impacts at the S. Flower Street & W. Pico Boulevard intersection during construction. The Project includes a Construction Management Plan, as a PDF, that would reduce the potential construction traffic impacts due to the lane closures, but there would still be temporary construction impacts that would be considered significant and unavoidable.

In addition, the construction of the related projects in the vicinity of the Project would contribute to traffic impacts during construction. There are several related projects under construction that have contributed to temporary lane closures and other construction activities that impact traffic levels of service in the vicinity. Due to the number of cumulative projects in the vicinity and the

uncertainty in terms of timing for each cumulative project and the potential overlap of development, the Draft EIR concluded and the City finds that the Project would contribute to a cumulatively significant construction impact.

Conflict with Applicable Plan, Ordinance or Policy -- Future with Project Operational Conditions (3 Intersections)

As analyzed in the Draft EIR, the Future With Project Conditions (Year 2022), 12 of the 29 study intersections would operate at LOS B or better during both the A.M. and P.M. peak hours. The remaining 17 intersections would operate at LOS C or worse during at least one of the peak hours. The Project would cause a significant impact at an intersection operating at LOS C, D, E, or F if the incremental change in V/C ratio due to the Project exceeds the thresholds described in Table 4.10-4 of the Draft EIR. The Draft EIR found that the Project's incremental increase in the V/C ratios at 25 of the 29 study intersections would be less than significant during the peak hours under Future With Project Conditions.

However, the Project would cause a significant impact at the following four intersections: L.A. Live Way & W. Pico Boulevard (A.M. and P.M. peak hours); Figueroa Street & W. 11th Street (A.M. and P.M. peak hours); Figueroa Street & W. Pico Boulevard (A.M. and P.M. peak hours); and Flower Street & W. Pico Boulevard (P.M. peak hour). Thus, mitigation measures were implemented to reduce impacts at these intersections. The feasible mitigation program for the Project that quantitatively reduced significant impacts includes: (1) implementation of a TDM program for the Project Site to promote peak period trip reduction; and (2) Transportation Systems Management (TSM) improvements, including signal controller upgrades at key intersections within the Study Area. As discussed in detail in the Traffic Study, the proposed mitigation measures reduced impacts to less than significant levels at one of the four significantly impacted intersections. Accordingly, the incremental impacts at the following three study intersections would be reduced, though not fully mitigated. Therefore, impacts at the following three study intersections would remain significant and unavoidable with the addition of Project traffic after mitigation: L.A. Live Way & W. Pico Boulevard (afternoon peak hour); Figueroa Street & W. Pico Boulevard (morning and afternoon peak hours; and Flower Street & W. Pico Boulevard (afternoon peak hour).

Therefore, the Draft EIR concluded and the City finds that the Project would exceed certain measures of effectiveness for the performance of the circulation system for the three intersections listed above. Accordingly, operational traffic impacts would be considered significant and unavoidable.

Project Design Features

PDF TRAF-1: Construction Management Plan: A detailed Construction Management Plan shall be submitted to the City's Department of Transportation (LADOT) for review and approval prior to the start of any construction work. The Construction Management Plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. The Construction Management Plan shall formalize how construction shall be carried out and identify specific actions that shall be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following mandatory elements:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.

- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Figueroa Street, Flower Street, and Pico Boulevard, to ensure traffic safety on public rights of way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's Figueroa Street, Flower Street and Pico Boulevard driveways.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Sequencing of construction activity to reduce the amount of construction-related traffic on arterial streets.
- Contain construction activity within the Project Site boundaries.
- Coordination with LADOT to address any overlapping of construction with the MyFigueroa project.
- Coordination with Metro to address any construction near the railroad right of way.
- Safety precautions for pedestrians and bicyclists through alternate routing and protection barriers/fencing that shall be implemented.
- Scheduling of construction-related deliveries and haul trips, so as to occur outside the commuter peak hours.

Mitigation Measures

MM-TRAF-1 (Transportation Demand Management Program): A Transportation Design Management (TDM) program shall be prepared to reduce the use of single occupant vehicles (SOV) during commute hours by increasing the number of trips by walking, bicycle, carpool, vanpool and transit.

A preliminary TDM program shall be prepared and provided for LADOT review prior to the issuance of the first building permit for this Project and a final TDM program approved by LADOT is required prior to issuance of the first certificate of occupancy for the Project. As recommended by the transportation study, the TDM program shall include, but is not limited to, the following:

- Provide a transportation information center and on-site TDM coordinator to educate employers, employees, hotel guests, and customers of surrounding transportation options
- Promote bicycling and walking through amenity upgrades such as exclusive access points, secured bicycle parking, sidewalk pavement improvements, wayfinding signage, etc. around the Project Site
- Promote and support carpool/vanpool/rideshare use through parking incentives and administrative support
- Incorporate incentives for using alternative travel modes
- Support existing and/or future efforts by LADOT for Mobility Hubs by providing amenities such as bicycle parking, rentals, shared vehicle rentals, transit information, etc. at the

Project Site (subject to design feasibility)

- Make a one-time fixed-fee financial contribution of $100,000 to the City's Bicycle Plan Trust Fund to implement bicycle improvements in the general Downtown Los Angeles area of the Project

MM-TRAF-2 (Transportation Systems Management Improvements): The Project shall contribute up to $30,000 toward Transportation Systems Management (TSM) improvements that would better accommodate intersection operations and increase intersection capacity throughout the study area. LADOT's ATSAC Section has identified the following upgrades as part of the TSM improvements:

- Fiber optic upgrades along South Figueroa Street from Pico Boulevard to Olympic Boulevard for ($20,000)

- Two CCTV camera upgrades at Pico Boulevard and Figueroa St, and LA Live Way and Pico Boulevard ($10,000)

These upgrades would improve the network capacity for real-time video monitoring of intersection, corridor, transit, and pedestrian operations in Downtown Los Angeles by reducing delays experienced by motorists at study intersections.

A final determination on how to implement these CCTV installations will be made by LADOT prior to the issuance of the first building permit. These installations will be implemented either by the Applicant through the B-Permit process of the Bureau of Engineering (BOE), or through payment of a one-time fixed fee of $30,000 to LADOT to fund the cost of the upgrades. If LADOT selects the payment option, then a required payment of $30,000 shall be provided to LADOT, and LADOT shall design and construct the upgrades.

If the installations are implemented by the Applicant through the B-Permit process, then these improvements must be guaranteed prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy. Temporary certificates of occupancy may be granted in the events of any delay through no fault of the Applicant, provided that, in each case, the Applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT.

Finding

Each decision making body of the City finds that all feasible mitigation measures to substantially reduce or avoid the project's cumulative construction traffic impact and the project's future-year operational traffic impacts have been incorporated into the project.

In accordance with CEQA Guidelines Section 15091, the City finds that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen these significant environmental impacts. The City also finds that specific economic, legal, social, technological or other considerations, including provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or project alternatives identified in the Final EIR. However, while implementation of mitigation measures will reduce the impacts, the project's cumulative construction traffic impact, and the project's future year traffic impacts, will be significant and unavoidable.

Rationale for Finding

With respect to operational traffic impacts, the Draft and Final EIR implemented a mitigation program for the Project that quantitatively reduced significant impacts which includes implementation of a TDM program for the Project Site to promote peak period trip reduction; and Transportation Systems Management (TSM) improvements, including signal controller upgrades at key intersections within the Study Area.

These mitigation measures are consistent with Transportation Impact Study Guidelines and the TDM program details a set of strategies proposed for the Project designed to reduce peak hour vehicular traffic to and from the Project Site. The TDM program implemented an achievable and conservative TDM trip reduction credit of 10 percent. In addition, the Project would contribute funding toward TSM improvements that would better accommodate intersection operations and increase intersection capacity. The TSM improvements would target the Figueroa Street corridor, as well as the intersection of LA Live Way & W. Pico Boulevard.

Moreover, the LADOT and the Traffic Study considered physical intersection improvements at the significantly impacted study intersections where the implementation of the TDM program would not mitigate the impacts to a level of insignificance. LADOT determined that other physical traffic mitigation improvements at these impacted intersections were infeasible because of existing physical condition, existing right-of-way limitations, or conflicts with adopted plans and policies. Therefore, the Draft EIR concluded that operational traffic impacts were significant and unavoidable.

The Project Site is located adjacent to mass transit and the Los Angeles Conventions Center. Even though the Draft EIR identified operational traffic significant unavoidable impacts, the location of the Project would encourage pedestrian activity and use of alternatives modes of transportation due to its location and the numerous options for mass transit around the Project Site. This Project is consistent with the City's vision for development on the Project Site and the long-range planning considerations of increasing density in the urban core to reduce traffic and environmental impacts.

With respect to cumulative construction traffic, as with the Project, most of the construction workers for the related projects are anticipated to arrive and depart the construction sites during off-peak hours thereby minimizing construction-related trips during the A.M. and P.M. peak traffic periods. Also, the haul truck routes for all of the related projects would be approved by LADOT according to the location of the individual construction site and the ultimate destination. Additionally, each cumulative project would be required to comply with City requirements regarding haul routes and would implement mitigation measures and/or include project characteristics, such as traffic controls and scheduling, notification, and safety procedures, to reduce potential traffic impacts during construction. However, the Draft EIR concluded that operational traffic impacts would remain significant and unavoidable.

Reference

For a complete discussion of the project's impacts associated with traffic, see Section 4.10, Transportation and Traffic, and Appendix K-1, Transportation Study and Appendix K-2, LADOT Assessment Letter, of the Draft EIR.

VII. ALTERNATIVES TO THE PROJECT

CEQA requires that an EIR analyze a reasonable range of feasible alternatives that could substantially reduce or avoid the significant impacts of a project while also meeting the project's basic objectives. An EIR must identify ways to substantially reduce or avoid the significant

effects that a project may have on the environment (Public Resources Code Section 21002.1). Accordingly, the discussion of alternatives shall focus on alternatives to a project or its location which are capable of avoiding or substantially reducing any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The alternative analysis included in the Draft EIR, therefore, identified a reasonable range of project alternatives focused on avoiding or substantially reducing the project's significant impacts.

Summary of Findings

Based upon the following analysis, the City finds, pursuant to CEQA Guidelines Section 15096(g)(2), that no feasible alternative or mitigation measure will substantially lessen any significant effect of the project, reduce the significant unavoidable impacts of the project to a level that is less than significant, or avoid any significant effect the project would have on the environment.

Project Objectives

Section 15124(b) of the California Environmental Quality Act (CEQA) Guidelines states that a project description shall contain "a statement of the objectives sought by the proposed project." In addition, Section 15124(b) of the State CEQA Guidelines further states that "the statement of objectives should include the underlying purpose of the project."

The underlying purpose of the Project is to develop a modern mixed-use hotel complex, with multiple hotel brands and room price points, which would be economically viable and supply the urban core with hotel rooms optimally located within walking distance to mass transit and regional entertainment destinations. This underlying purpose of the Project is also consistent with the Mayor's and the Los Angeles Department of Convention and Tourism's stated goal of reaching 8,000 hotel rooms within walking distance of the Convention Center. The objectives for the Project include:

- Objective 1: Create a mixed-use hotel complex that contributes distinctive hotel rooms to the current and forthcoming hotel supply to help alleviate demand pressure created by tourism, convention business, and local and regional entertainment facilities.

- Objective 2: Provide a variety of hotel brands, room options at varying price points, and publicly accessible amenity spaces that support the concentration of residential uses, entertainment, retail, and convention destinations that are rapidly developing in the South Park district.

- Objective 3: Utilize a development site that the City has indicated is optimally located to support a revitalized Convention Center by creating a vibrant mixed-use hotel that is compatible with existing development patterns and reflects the City's long-term planning goals for high-density development in transit core areas of downtown.

- Objective 4: Introduce an architecturally distinctive development that contributes dramatic elements to the City's evolving skyline, complements the scale of adjacent development, and activates the pedestrian realm along adjacent street frontages.

- Objective 5: Enhance and activate the prominent corner of S. Figueroa Street and W. Pico Boulevard, facing the Convention Center, with distinctive sidewalks, landscaping, ground floor retail uses and outdoor activity to attract and accommodate Convention Center patrons, visitors, and neighborhood residents.

- Objective 6: Redevelop an underutilized site by replacing the existing surface parking and moderate commercial uses with an economically viable and aesthetically attractive development capable of delivering over 1,000 hotel rooms on a physically constrained site that will be physically and programmatically compatible with the variety of urban uses in the vicinity.

- Objective 7: Improve pedestrian connectivity, safety, and security in the area by improving the pedestrian experience and wayfinding ability between the Convention Center, Gilbert Lindsay Plaza, LA Live, and the adjacent light rail station.

- Objective 8: Support the MyFigueroa plan goals for complete streets that make Figueroa Street safer and more attractive for walking, bicycling, and transit, and integrate components of the LASED Streetscape Plan and City's Mobility Element to produce thematic continuity and plan consistencies where feasible.

- Objective 9: Create a sign district that encompasses the Project and the surrounding parcels which results in an aesthetically enhanced area inclusive of lighting, wayfinding elements, on- and off-site advertising, and improved aesthetic character that is generally compatible with surrounding sign districts and neighborhood improvement plans in the South Park area.

- Objective 10: Develop a feasible mixed-use hotel complex that efficiently concentrates density on the site and stimulates the economic vitality of the region by providing construction and permanent jobs, attracting commercial tenants and hotel operators, and increasing hotel patrons that collectively increase City tax revenues directly and indirectly.

Alternatives Analyzed in the Draft EIR and Final EIR

CEQA requires that an EIR analyze a reasonable range of feasible alternatives that could substantially reduce or avoid the significant impacts of a project while also meeting a project's basic objectives.

Each decision-making body of the City finds that given the potential impacts of the project, the Final EIR considered a reasonable range of alternatives to the project to provide informed decision-making in accordance with Section 15126.6 of the CEQA Guidelines.

Based on the significant environmental impacts of the project and the objectives established for the project, the following alternatives to the project were evaluated in the Final EIR:

- Alternative 1: No Project/No Build
- Alternative 2: Reduced Hotel Rooms (Two Towers)
- Alternative 3: Reduced Hotel Rooms (Single Tower)
- Alternative 4: Mixed-Use Hotel, Commercial, and Residential

In addition, the Final EIR analyzed another alternative that was suggested by American Life, Inc. (ALI). ALI owns the Courtyard Marriott and Residence Inn hotels located in the vicinity of the Project. ALI provided a site plan prepared by AXIS dated October 18, 2017 ("AXIS Site Plan") and claimed that it was another feasible reduced-density alternative. Response to Comment No. 11-1 in the Final EIR analyzed the AXIS Site Plan, provided a detailed response to comments, and contained evidence that demonstrated why the suggested alternative was not feasible for several reasons.

Alternative 1: No Project/No Build

Description of Alternative

Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved and no new development would occur within the Project Site. The physical conditions of the Project Site would generally remain as they are at the time of NOP issuance. The Project Site would continue to be occupied by a two-story approximately 27,800-square-foot commercial building containing three restaurants, and surface parking lots that serve the building and as general public parking, bisected by a public alley accessed from W. Pico Boulevard. No new construction would occur; on-site improvements would be limited to normal upkeep and maintenance of the existing building and parking facilities.

Impact Summary of Alternative

The No Project/No Build Alternative would avoid the Project's significant and unavoidable environmental impacts related to construction noise and intersection service level transportation and construction traffic impacts. Alternative 1 would also eliminate most of the Project's less than significant impacts and less than significant with mitigation impacts. However, the Alternative would have greater impacts with respect to hydrology and water quality and land use and planning, since the existing site would not improve the site's water drainage and filtration like the Project, and is considered to be less compatible with the planning and land use goals for the site and downtown vicinity than the Project.

Finding

With respect to Alternative 1, each decision making body of the City adopts the third possible finding as outlined above in Subsection III, which states that "specific 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." (CEQA Guidelines Section 15091(a)(3)).

Rationale for Finding

No new development would occur under the No Project/No Build Alternative and the project site would continue to operate as it does currently. As such, Alternative 1 would not meet the underlying purpose of the project or the project objectives. While the No Project/No Build Alternative would avoid all of the project's significant environmental impacts, it would not meet the project's underlying purpose and would not attain any of the project objectives. For these reasons, each decision making body of the City rejects the No Project/No Build Alternative as infeasible.

Reference

For a complete discussion of impacts associated with Alternative 1, see Section V, Alternatives, of the Draft EIR.

Alternative 2: Reduced Hotel Rooms (Two Towers)

Description of Alternative

Alternative 2, the Reduced Hotel Rooms Alternative (Two Towers), would redevelop the Project Site with the same types of uses as the Project, including up to three hotels and ground-floor retail/restaurant uses in two towers, but would have 30 percent fewer hotel guest rooms

compared to the Project. A total of 813 guest rooms would be provided, a reduction of 349 guest rooms compared to the Project's proposed 1,162 guest rooms. The development density would be reduced by approximately 17 percent to 385,567 square feet (sf) compared to the Project, resulting in an approximately 20 percent reduction in the FAR (7.28:1 compared to the Project's 9.9:1).

The Hotel A/B Tower would contain 579 guest rooms, a reduction of 241 guest rooms compared to the Project, and would total approximately 261,891 sf. The Hotel A/B Tower would still include indoor amenities, outdoor pool decks, and fitness decks as under the Project, as well as the same amount of meeting space (11,286 sf) and floor retail/restaurant spaces (11,000 sf). It would be reduced to 32 stories (i.e., five fewer floors of guest rooms) and 429 feet in height compared to the Project's proposed 42 stories and 529 feet.

The Hotel C Tower would contain 234 guest rooms, a reduction of 108 guest rooms compared to the Project, and would total approximately 123,676 sf. The Hotel C Tower would still include indoor amenities, an outdoor pool deck, and food and beverage facilities as under the Project, as well as the same amount of ground-floor retail/restaurant uses (2,145 sf). The Hotel C Tower would be reduced to 20 stories (i.e., nine fewer floors of guest rooms) and 276 feet in height compared to the Project's 25 stories and 326 feet.

The two towers would be built in the same locations and with the same footprints as under the Project, with Hotel A/B contained in the larger tower (Hotel A/B Tower) and Hotel C (Hotel C Tower) contained in the smaller tower. All parking for Hotel A/B and Hotel C would continue to be provided within a podium structure incorporated into the Hotel A/B Tower, although only five levels of podium parking above the ground-level retail/restaurant space would be required compared to the Project's six levels.

A Sign District would still be proposed for the Project Site as well as for surrounding parcels, as under the Project. Streetscape improvements on all Project Site street frontages would still be implemented as under the Project, including lighting and landscaping.

Impact Summary of Alternative

Alternative 2 would reduce the severity of Project's significant and unavoidable operational traffic impacts under Future with Project conditions at buildout due to the reduced density of the alternative. With implementation of MM-TRAF-1, Alternative 2 would have no impacted intersections, and impacts would be less than significant. Thus, Alternative 2's operational impacts on traffic would be less than those of the Project. With a reduced building profile, development program, and magnitude of construction, this Alternative would also help reduce less than significant impacts for other environmental topics, including construction and operational impacts (e.g. operational emissions, carbon monoxide hotspots, TACs, operational noise, public services, wastewater, water supply, energy). Although this Alternative reduces the overall duration of construction it would not necessarily reduce the intensity of the maximum hour or day of construction. As such, similar to the proposed Project, the significant and unmitigatable construction noise impacts to residential uses and significant and unavoidable construction traffic impacts resulting from the Project would not be reduced to less than significant levels under this Alternative.

Finding

With respect to Alternative 2, each decision making body of the City adopts the third possible finding as outlined above in Subsection III, which states that "specific 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." (CEQA Guidelines Section 15091(a)(3)).

Rationale for Finding

Alternative 2, would reduce development intensity by approximately 17 percent. This Alternative would not achieve the underlying purpose of the Project to the same extent considering economic viability, density objectives, economic development objectives, and development efficiencies for the site. In addition, Alternative 2 would not satisfy agency planning and policy goals for the public and private parcels that comprise the Project Site.

Regarding the project objectives, Alternative 2 would not satisfy many of the objectives or the underlying purpose of the Project to the same extent as the Project. For example, Alternative 2 would not meet the underlying purpose of the project because it would not be as economically viable as the Project considering the reduced density. Similarly, Alternative 2 would not satisfy, to the same extent as the Project because of the reduced density, the City's goal of providing 8,000 hotel rooms adjacent to the Los Angeles Convention Center. Moreover, Alternative 2 would not satisfy the project objectives to utilize the Project site in a manner that is consistent with the city's long-term planning goals for high density development in the transit core of downtown. Similarly, Alternative 2 would not be capable of delivering over 1,000 hotel rooms on the Project Site. The alternative would also not contribute to the same extent of economic development, in comparison to Project, as a result of the reduced density. The reduced density associated with Alternative 2 does not satisfy the underlying purpose of the Project or its key objectives.

In addition, regarding the City's planning goals and policies, the City has indicated that redevelopment of the Project Site should be high-density and has utilized planning tools to maximize developable area. Alternative 2 would not maximize developable area on the Project Site due to the reduced proposed density of the alternative. Moreover, the City's has stated its vision for the Project Site in several documents, which indicate that the Project Site should contain high density uses to maximize density on redevelopment sites located adjacent to transit and within the transit core areas identified in the City's planning and policy documents. The reduced density associated with Alternative 2 conflicts with the City's planning goals and is undesirable from a policy standpoint.

Furthermore, regarding social and other considerations, the Project Site is located in an area of the City that is undergoing rapid change and densification. The existing conditions and development trends immediately surrounding the Project Site are maximizing density because the area is transit rich, located adjacent to the Los Angeles Convention Center and regional entertainment venues, and will one of the centers of Olympic activity during the 2028 Olympic Games. Thus, there are several social and other considerations that warrant maximizing the density of development on the Project Site to implement a hotel project that can deliver the amount and type of hotel rooms and amenities desired by the City to support hotel room demand caused by convention business, regional entertainment venues, domestic and international tourism, and the forthcoming Olympic Games.

Reference

For a complete discussion of impacts associated with Alternative 2, see Section V, Alternatives, of the Draft EIR. Also see the 2012 RFP for the Project Site and City Council motions and CLA Reports indicating the preferred high-density development goal for the Project Site.

Alternative 3: Reduced Hotel Rooms (Single Tower)

Description of Alternative

Alternative 3, the Reduced Hotel Rooms Alternative (Single Tower), would redevelop the western half of the Project Site with the same types of uses as the Project, while maintaining the existing surface parking lot in eastern half of the Project Site, in the location of proposed Tower C. This alternative is a more substantial reduction in density than Alternative 2. This Alternative would include up to two hotels and ground-floor retail/restaurant uses, but would provide approximately 30 percent fewer hotel rooms than the Project. All proposed uses would be housed in a single building, Hotel A/B Tower, in the same location and with the same footprint as the Hotel A/B Tower under the Project. The site-wide development density would be reduced by approximately 31.9 percent to 344,886 sf, resulting in an approximately 34 percent reduction in the FAR (6.51:1 compared to the Project's 9.9:1).

Under this Alternative, a total of 820 guest rooms would be provided in Hotel A/B Tower, a reduction of 342 guest rooms compared to the Project's proposed 1,162 guest rooms. The tower would include similar indoor amenities, outdoor pool decks, fitness decks, and food and beverage facilities as under the Project, as well as the same amount of meeting space (11,286 sf) and less floor retail/restaurant spaces (11,000 sf). The square footage of Hotel A/B Tower ground-floor retail/restaurant space (11,000 sf) would be unchanged compared to the Project, but since no Hotel C Tower would be constructed, the total square footage of retail/restaurant space site-wide would be reduced by 2,145 sf compared to the Project. The Hotel A/B Tower would be decreased to 41 stories (i.e., one less floor of guest rooms) and 519 feet in height compared to the Project's proposed 42 stories and 529 feet.

All required parking to serve the Project would continue to be provided within a podium structure incorporated into the Hotel A/B Tower, although only five levels of podium parking above the ground-level retail/restaurant space would be required compared to the Project's six levels of parking.

The proposed site of the Hotel Tower C under the Project, which is presently a surface parking lot containing approximately 47 spaces, would not be redeveloped and would continue to serve as a parking lot, as at present.

A City-initiated Sign District would be proposed for the Project Site and surrounding parcels as under the Project. Streetscape improvements on all Project Site street frontages would still be implemented as under the Project, including lighting and landscaping.

Impact Summary of Alternative

Alternative 3 would reduce the severity Project's significant and unavoidable operational traffic impacts under Future with Project conditions at buildout due to the reduced density of the alternative. With implementation of MM-TRAF-1, Alternative 3 would have no impacted intersections, and impacts would be less than significant. Thus, Alternative 3's operational impacts on traffic would be less than those of the Project. With a reduced development program, and magnitude of construction, this Alternative would also reduce less than significant impacts for other environmental topics, including construction and operational impacts (e.g. aesthetics, air quality, geology and soils, GHG emissions, operational noise, public services, wastewater, water supply, energy). Although this Alternative reduces the overall duration of construction it would not necessarily reduce the intensity of the maximum hour or day of construction. As such, similar to the proposed Project, the significant and unmitigatable construction noise impacts to residential uses and significant and unavoidable construction

traffic impacts resulting from the Project would not be reduced to less than significant levels under this Alternative.

Finding

With respect to Alternative 3, each decision making body of the City adopts the third possible finding as outlined above in Subsection III, which states that "specific 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." (CEQA Guidelines Section 15091(a)(3)).

Rationale for Finding

Alternative 3 would reduce the amount of development by approximately 30 percent and this alternative presents a modified design because the land uses would be housed in a single tower, which would thereby leave the eastern half of the Project Site undeveloped. This Alternative would not maximize the development efficiencies of the Project Site or be compatible with planning goals and policies to activate street frontages and transition surface parking lots into active land uses adjacent to transit. In addition, Alternative 3 would not be desirable to accomplish the level of site activation anticipated for the site in current planning documents and long-range planning policy for development adjacent to rail transit and in a transit core area of downtown.

Regarding the project objectives, Alternative 3 would not satisfy many of the objectives or the underlying purpose of the Project to the same extent as the Project. For example, Alternative 3 would not meet the underlying purpose of the project because it would not be as economically viable as the Project considering the reduced density. Similarly, Alternative 3 would not satisfy, to the same extent as the Project because of the reduced density, the City's goal of providing 8,000 hotel rooms adjacent to the Los Angeles Convention Center. Moreover, Alternative 3 would not satisfy the project objectives to utilize the Project site in a manner that is consistent with the city's long-term planning goals for high density development in the transit core of downtown. Similarly, Alternative 3 would not be capable of delivering over 1,000 hotel rooms on the Project site. Neither would alternative to contribute the same extent of economic development, in comparison to the Project, result of the reduced density. The reduced density associated with Alternative 3 does not satisfy the underlying purpose of the Project or its key objectives. In addition, Alternative 3 would not, to the same extent as the project, alleviate demand pressures created by tourism, convention business, and local and regional entertainment facilities. Similarly, Alternative 3 would not utilize the Project Site in a manner that is consistent with the high density development goals for project sites adjacent to transit. In addition, Alternative 3 would not activate the pedestrian around along all of the street frontages because a portion of the development site would remain a surface parking lot. Neither would Alternative 3 develop a hotel complex that most efficiently concentrates density on the Project Site and stimulate as a high level of economic vitality as the Project.

In addition, regarding the City's planning goals and policies, the City has indicated that redevelopment of the Project Site should be high-density and has utilized planning tools to maximize developable area. Alternative 3 would not maximize developable area on the Project Site due to the reduced proposed density of the alternative. Moreover, the City's has stated its vision for the Project Site in several documents, which indicate that the Project Site should contain high density uses to maximize density on redevelopment sites located adjacent to transit and within the transit core areas identified in the City's planning and policy documents. The reduced density associated with Alternative 3 conflicts with the City's planning goals and is undesirable from a policy standpoint.

Furthermore, regarding social and other considerations, the Project Site is located in an area of the City that is undergoing rapid change and densification. The existing conditions and development trends immediately surrounding the Project Site are maximizing density because the area is transit rich, located adjacent to the Los Angeles Convention Center and regional entertainment venues, and will one of the centers of Olympic activity during the 2028 Olympic Games. Thus, there are several social and other considerations that warrant maximizing the density of development on the Project Site to implement a hotel project that can deliver the amount and type of hotel rooms and amenities desired by the City to support hotel room demand caused by convention business, regional entertainment venues, domestic and international tourism, and the forthcoming Olympic Games.

Reference

For a complete discussion of impacts associated with Alternative 3, see Section V, Alternatives, of the Draft EIR. Also see the 2012 RFP for the Project Site and City Council motions and CLA Reports indicating the preferred high-density development goal for the Project Site.

Alternative 4: Mixed-Use Hotel, Commercial, and Residential

Description of Alternative

Alternative 4, the Mixed-Use Hotel, Commercial, and Residential Alternative, would redevelop the Project Site with two hotels in a single tower (Hotel A/B Tower), as under the Project. A second tower (the Hotel C Tower under the Project) would instead be developed with residential uses (Residential Tower), and the ground-floor retail/restaurant space and podium amenities would remain unchanged from the Project. The development density would be the same as under the Project, as would the FAR.

The number of hotel guest rooms in the Hotel A/B Tower would remain unchanged compared to the Project at 820 guest rooms, although elimination of the third hotel in the second tower would reduce the number of guest rooms site-wide by 342 guest rooms compared to the Project. The Hotel A/B Tower would also include meeting space, indoor amenities, outdoor pool decks, fitness decks, and food and beverage facilities as under the Project (including 11,286 sf of meeting space and 11,000 sf of ground-floor retail/restaurant space). Ground-floor retail/restaurant uses in both buildings would be unchanged compared to the proposed Project and would total approximately 13,145 sf.

Parking would continue to be provided within a podium structure incorporated into Hotel A/B Tower as under the Project, although three additional levels of podium parking would be required above the ground-level retail/restaurant space, for a total of nine levels of podium parking, to accommodate the residential parking code requirement. The Hotel A/B Tower would therefore be 45 stories compared to the Project's 42 stories and approximately 559 feet tall compared to 529 feet under Project.

The Residential Tower would contain a total of 176 residential units ranging from studios to one- and two-bedroom units, with unit sizes ranging from 500 sf to 1,100 sf. Amenities for residents would total approximately 15,000 sf and would include a fitness center, media room, business center, and pool deck. The Residential Tower would be 25 stories and approximately 326 feet in height, the same number of stories and heights as the Hotel C Tower under the Project. The two towers under this alternative would be in the same locations and occupy the same building footprints under the Project.

A Sign District would still be proposed for the Project Site as well as for surrounding parcels, as under the Project. Streetscape improvements on all Project Site street frontages would still be implemented as under the Project, including lighting and landscaping.

Impact Summary of Alternative

The Alternative would reduce some, but not all, the Project's significant and unavoidable operational traffic impacts. Due to Alternative 4's reduction in guest rooms, there would be a corresponding reduction in daily trips generated from hotel uses; however, there would be an increase in daily trips corresponding to the addition of residential units. Alternative 4 would result in three impacted intersections (Intersections 5, 13, and 15) prior to mitigation. After mitigation, Alternative 4 would result in one significant and unavoidable traffic impact at Intersection 15. Thus, Alternative 4's impacts on intersection level of service would be significant and unavoidable but less than those of the Project. With an alternative development program, and magnitude of construction, this Alternative would also reduce less than significant impacts for other environmental topics, including construction and operational impacts (e.g. operational emissions and carbon monoxide hotspots, wastewater, water supply, energy), but would cause greater impacts in other categories due to the taller tower design and mix of uses (light/glare, shading, geology and soils, and public services). Also, similar to the Project, the Alternative would not be able to reduce significant and unavoidable Project-level and cumulative construction noise impacts to less than significant levels due to surrounding residential uses, and would not reduce the significant and unavoidable construction traffic impacts. Therefore, construction noise and construction traffic impacts for Alternative 4, would result in the same significant and unavoidable impacts as the Project.

Finding

With respect to Alternative 4, each decision making body of the City adopts the third possible finding as outlined above in Subsection III, which states that "specific 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." (CEQA Guidelines Section 15091(a)(3)).

Rationale for Finding

Alternative 4 would include the hotel rooms and commercial uses as under the Project, although the number of hotel rooms would be reduced by approximately 342 compared to the Project and would be housed in a single, taller tower, and the second high-rise tower would house only residential uses. This residential alternative would not achieve the underlying Project purpose to develop a hotel complex, with multiple hotel brands and room price points that would be economically viable and supply the urban core with hotel rooms optimally located within walking distance to mass transit and regional entertainment destinations.

Regarding the project objectives, Alternative 4 would not satisfy density objectives to the same extent as the Project, because of the reduced density and residential uses that are inconsistent with the City's goal of providing 8,000 hotel rooms adjacent to the Los Angeles Convention Center. Moreover, Alternative 4 would not satisfy the project objectives to utilize the Project site in a manner that is consistent with the city's long-term planning goals for high density development in the transit core of downtown. Similarly, Alternative 4 would not deliver over 1,000 hotel rooms on the Project site. Neither would the alternative to contribute the same extent of economic development, in comparison to Project, as a result of the reduced density of hotel rooms and the corresponding reduction in tax revenue generated for the City. The reduced density associated with Alternative 4 does not satisfy the underlying purpose of the Project or its key objectives. In addition, Alternative 3 would not, to the same extent as the project, alleviate

demand pressures created by tourism, convention business, and local and regional entertainment facilities. Neither would Alternative 4 develop a hotel complex that most efficiently concentrates density on the Project Site and stimulates as a high level of economic vitality as the Project.

In addition, regarding the City's planning goals and policies, the City has indicated that redevelopment of the Project Site should be high-density and has utilized planning tools to maximize developable area and provide for hotel uses. Alternative 4 proposes more residential uses on the Project Site which is not consistent with the City's prior requests for proposal goals or long-term use of the city-owned parcels on the Project Site. Also, Alternative 4 would not maximize developable area on the Project Site due to the reduced proposed density of the alternative. Moreover, the City's has stated its vision for the Project Site in several documents, which indicate that the Project Site should contain high density uses to maximize density on redevelopment sites located adjacent to transit and within the transit core areas identified in the City's planning and policy documents. The reduced density associated with Alternative 4 conflicts with the City's planning goals and is undesirable from a policy standpoint.

Furthermore, regarding social and other considerations, the Project Site is located in an area of the City that is undergoing rapid change and densification. The existing conditions and development trends immediately surrounding the Project Site are maximizing density, for hotel uses particularly, because the area is transit rich, located adjacent to the Los Angeles Convention Center and regional entertainment venues, and will be one of the centers of Olympic activity during the 2028 Olympic Games. Thus, there are several social and other considerations that warrant maximizing the hotel room density of development on the Project Site to implement a hotel project that can deliver the amount and type of hotel rooms and amenities desired by the City to support hotel room demand caused by convention business, regional entertainment venues, domestic and international tourism, and the forthcoming Olympic Games.

Reference

For a complete discussion of impacts associated with Alternative 4, see Section V, Alternatives, of the Draft EIR. Also see the 2012 RFP for the Project Site and City Council motions and CLA Reports indicating the preferred high-density development goals for the Project Site.

Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives. An environmentally superior alternative is an alternative to a project that would reduce and/or eliminate the significant, unavoidable environmental impacts associated with the project without creating other significant impacts and without substantially reducing and/or eliminating the environmental benefits attributable to the project.

With respect to identifying an Environmentally Superior Alternative among those analyzed in this EIR, the range of Alternatives includes the 1) No Project/No Build Alternative; 2) the Reduced Hotel Rooms (Two Towers) Alternative; 3) the Reduced Hotel Rooms (Single Towers) Alternative; and the 4) Mixed-Use Hotel, Commercial, and Residential. As indicated in the EIR, Alternative 1, the No Project/No Build Alternative, would have less impact than the Project or other alternatives and is considered the overall environmentally superior Alternative.

In accordance with the CEQA Guidelines requirement to identify an environmentally superior Alternative other than the No Project/No Build Alternative, the EIR provided a comparative evaluation of the remaining alternatives and concluded that Alternative 3, the Reduced Hotel Rooms (Single Tower) Alternative, would be the environmentally superior alternative as it would eliminate of the Project's significant unavoidable operational traffic impacts at buildout. Alternative 3 would also result in reduced construction noise impacts compared to the Project, as well as reduced impacts for several other environmental topics.

Alternatives Rejected as Being Infeasible

Section 15126.6(c) of the CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible, and briefly explain the reasons underlying the lead agency's determination. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives can be rejected by the City for specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, that make infeasible the project alternatives identified in the final EIR. Alternatives to the project that have been considered and rejected as infeasible include the following:

Alternative Off-Site Locations*:* The Draft EIR determined an alternative location would be infeasible and did not consider an alternative location in the detailed alternatives analysis for several reasons. First, the Project Site is optimally located to minimize traffic impacts because it is located adjacent to the Metro Blue Line Pico Station and across the street from the Los Angeles Convention Center. Second, the Project Site is comprised of parcels that are privately and publicly owned. The City has sought development of its parcels for hotel uses for several years. The Applicant secured the private parcels around the City parcels and has presented a development program that is aligned with the City's stated intentions for the site, as well as, the long-term planning goals for the area. Thus, an alternative site would not achieve the City's development intentions for its parcels and there is not another alternative site in the vicinity that presents the same public-private participation concepts as the Project Site. Third, the Applicant does not own any other sites in Los Angeles at this time. The Applicant considered other parcels in the South Park area, but did not secure control of those parcels. There are minimal, if any, available development sites that satisfy the underlying purpose of the Project and could be reasonably acquired by the Applicant in a manner that allows the City to utilize its parcels for hotel development in proximity to the Los Angeles Convention Center. Fourth, development of the Project on an alternative site would not be likely to substantially reduce the Project's potential impacts. The Project's temporary construction noise and traffic impacts are likely to occur at a similar level in most development site locations in the vicinity. Finally, the Project is suited to its specific location, in particular with respect to its location between Metro Blue Line Pico Station, the Los Angeles Convention Center, LA Live, and the Los Angeles Sports and Entertainment District (LASED). An alternative site not in the immediate vicinity would not help fulfill the City's identified goal of reaching 8,000 hotel rooms within walking distance of the Los Angeles Convention Center, which is also Project Objective. *Alternative On-Site Uses:* The Draft EIR determined an alternative on-site use would be infeasible and did not consider this alternative in the detailed alternatives analysis. The Draft EIR considered the development of residential uses on the Project Site as Alternative 4. Alternative land uses including office uses were also considered on the Project Site, but would not have met most of the project objectives including fulfillment of the City's identified goal for reaching 8,000 hotel rooms within walking distance of the Convention Center; providing a variety of hotel brands, room options at varying price points, and publicly accessible amenities to support the concentration of residential uses and entertainment, and convention destinations in the South Park district; and doing so on a site that the City has indicated is optimally located to support a revitalized Convention Center,

reflecting the City's long-term planning goals for high-density development in the downtown area. Also, likely office uses would not substantially reduce traffic impacts compared to the proposed Project. Thus, this alternative was rejected from further consideration in the Draft EIR.

Retention/Adaptive Reuse of Existing On-Site Building: The Draft EIR determined retention/adaptive reuse of the existing on-site building alternative would be infeasible and did not consider this alternative in the detailed alternatives analysis. The existing building's location would inhibit construction and operation of a suitable high density development on the Project Site due to the limited size and configuration of the Project Site and the public and private ownership of the parcels. In addition, redevelopment of the Project Site seeks to incorporate the existing public alley that bisects the site and provides a linkage between W. Pico Boulevard the interior of the site and adjacent property to the north of the Project Site. Also, the existing building was determined in the Initial Study to not be architecturally important or otherwise distinctive as a historical or cultural resource, and its retention is not consistent with a plan to redevelop the City parcels and surrounding parcels into a project that could meet with objectives and be consistent with the City's envisioned uses and density. Thus, it was determined unrealistic to develop the private and public parcels while retaining the existing building, which occupies a substantial portion of the development footprint. Moreover, the existing two-story building would not be physically compatible with the Project at buildout or the surrounding neighborhood, including the under-construction Circa project to the north. For these reasons, an adaptive reuse of the building was considered by rejected as an alternative for further analysis.

***Extended Construction Alternative*:** The Draft EIR determined extended construction alternative would be infeasible and did not consider this alternative in the detailed alternatives analysis. The Project's significant construction noise impact to adjacent future residents to be located at the Circa project (1200 S. Figueroa Street) is caused, in part, by the intensity of construction activity on the Project Site at any given time. The use of a 15-foot tall sound barrier at the Project Site boundary would reduce this impact to less than significant at ground level; however, future residential uses would be atop an approximately 90-foot tall podium and the ground-level barrier would not adequately reduce construction noise impacts. Although temporary, this impact is, therefore, significant and unavoidable. The analysis of Project impacts assumed an optimistic scenario wherein the Hotel A/B and Hotel C Towers are essentially under simultaneous, overlapping construction. An alternative to reduce the number of pieces of equipment on site simultaneously by extending the construction schedule would reduce the noise levels somewhat, but not appreciably, and the impact would remain significant and unavoidable due to the infeasibility of blocking the line of site to the future residential uses 90 feet above ground level. An extended construction schedule alternative would needlessly delay helping to fulfill the City's identified goal of reaching 8,000 hotel rooms within walking distance of the Convention Center, which is a Project Objective set forth in Chapter 2, Project Description, of the Draft EIR and other key benefits of the Project.

AXIS Site Plan Alternative: As a response to comment in the Final EIR, the EIR determined that the AXIS Site Plan would not be a feasible alternative. American Life, Inc. wrote a comment letter on the Draft EIR, on behalf of 901 West Olympic Boulevard Limited Partnership (ALI), that provided a site plan prepared by AXIS dated October 18, 2017 (AXIS Site Plan). ALI claimed that the AXIS Site Plan was a "feasibility study," that accommodated a 617-room hotel with a 6:1 FAR that the Draft EIR should have studied as a "code-compliant" Alternative. A detailed response to these issues, and ALI's entire comment letter, is included in the Final EIR as Response to Comment Letter 11. Therein, the response explains that the AXIS Site Plan: (1) is not equivalent to a feasibility study; (2) exceeds 6:1 FAR and would require entitlements similar to the Project; (3) is not feasible for a variety of reasons; and (4) is not considerably different than the range of alternatives analyzed in the Draft EIR.

The AXIS Site Plan would redevelop the Project Site with the same types of uses as the Project, including three hotels and ground-floor retail/restaurant uses in two towers, but would have 47 percent fewer hotel guest rooms compared to the Project, and the development density would be reduced by approximately 34 percent, resulting in a 6.3:1 floor area ratio (FAR) as compared to the Project's 9.9:1 FAR. The height of both towers would be reduced under this Alternative, but other features such as amenities, tower locations and footprints, and parking location would be similar to that of the Project.

It should be noted that ALI did not present any PDFs or mitigation measures for the AXIS Site Plan that could reduce its potentially significant environmental impacts. In other words, ALI presented a plan but did not provide enough detail or proposed measures to demonstrate that implementation of the AXIS Site Plan would in fact reduce significant impacts compared to the Project and the alternatives analyzed in the Draft EIR. However, to provide a reasoned analysis that clarifies how the AXIS Site Plan compares to the Project and the alternatives, the analysis in the Final EIR conservatively applied similar PDFs and mitigation measures used for the Project and the other alternatives.

The AXIS Site Plan Alternative would reduce the severity of the Project's significant and unavoidable operational traffic impacts under Future with Project conditions at buildout. With implementation of MM-TRAF-1, the alternative would have no impacted intersections, and impacts would be less than significant. Thus, the alternative's operational impacts on traffic would be less than those of the Project. With a reduced development program, and magnitude of construction, this Alternative would also reduce less than significant impacts for other environmental topics, including construction and operational impacts.

However, since the alternative proposes 6.3:1 FAR, the AXIS Site Plan exceeds the current 6:1 FAR limit at the Project Site. Thus, it would require use of the TFAR Ordinance, or entitlements similar to the Project to implement its design and to ensure consistency with applicable land use plans, policies, and guidance. As the AXIS Site Plan would construct two high-rise towers, require similar entitlements, and develop land uses with the same mix of uses, its land use impacts would be similar to those of the Project and would be similarly less than significant.

This Alternative reduces the overall duration of construction, but it would not necessarily reduce the intensity of the maximum hour or day of construction. As such, similar to the proposed Project, the significant and unmitigatable construction noise impacts to residential uses and significant and unavoidable construction traffic impacts resulting from the Project would not be reduced to less than significant levels under this Alternative.

The AXIS Site Plan Alternative would reduce the amount the total square footage of development by approximately 34 percent and the number of hotel rooms by 47 percent. This Alternative would not maximize the development efficiencies of the Project Site. In addition, the alternative would not be desirable to accomplish the level of site activation anticipated for the site in current planning documents and long-range planning policy for development adjacent to rail transit and in a transit core area of downtown.

Regarding the project objectives, the Alternative would not satisfy many of the objectives or the underlying purpose of the Project to the same extent as the Project. For example, the Alternative would not meet the underlying purpose of the project because it would not be as economically viable as the Project considering the reduced density. Similarly, the Alternative would not satisfy, to the same extent as the Project because of the reduced density, the City's goal of providing 8,000 hotel rooms adjacent to the Los Angeles Convention Center. Moreover, the Alternative would not satisfy the project objectives to utilize the Project site in a manner that is consistent with the city's long-term planning goals for high density development in the transit core of downtown. Similarly, the Alternative would not be capable of delivering over 1,000 hotel

rooms on the Project site, and would not contribute to economic development to the same extent as the Project, as a result of the reduced density. In addition, the Alternative would not, to the same extent as the project, alleviate demand pressures created by tourism, convention business, and local and regional entertainment facilities. Similarly, the Alternative would not utilize the Project Site in a manner that is consistent with the high density development goals for project sites adjacent to transit. It would also not develop a hotel complex that most efficiently concentrates density on the Project Site and stimulate as a high level of economic vitality as the Project.

In addition, regarding the City's planning goals and policies, the City has indicated that redevelopment of the Project Site should be large-scale and has utilized planning tools to maximize developable area. The Alternative would not maximize developable area on the Project Site due to the reduced proposed density of the alternative. Moreover, the City has stated its vision for the Project Site in several documents, which indicate that the Project Site should contain high density uses to maximize density on redevelopment sites located adjacent to transit and within the transit core areas identified in the City's planning and policy documents. The reduced density associated with the Alternative conflicts with the City's planning goals and is undesirable from a policy standpoint.

Furthermore, regarding social and other considerations, the Project Site is located in an area of the City that is undergoing rapid change and densification. The existing conditions and development trends immediately surrounding the Project Site are maximizing density because the area is transit rich, located adjacent to the Los Angeles Convention Center and regional entertainment venues, and will one of the centers of Olympic activity during the 2028 Olympic Games. Thus, there are several social and other considerations that warrant maximizing the density of development on the Project Site to implement a hotel project that can deliver the amount and type of hotel rooms and amenities desired by the City to support hotel room demand caused by convention business, regional entertainment venues, domestic and international tourism, and the forthcoming Olympic Games. Finally, the AXIS Site Plan Alternative is not economically feasible. The Final EIR contains an Economic Feasibility Report prepared by CBRE that concludes the alternative is not viable.

Alternatives Analyzed in the Draft and Final EIR: To be comprehensive, the City restates its findings of infeasibility provided regarding each of the Alternative discussed above including Alternatives 1-4, which were analyzed in detail in the Draft EIR; and the AXIS Site Plan, which was analyzed and found infeasible in the Final EIR as a response to comment.

In conclusion, the City rejects the alternatives above as being infeasible, due either to not meeting the project objectives, potentially generating greater impacts than would the project, not being economically feasible, and/or not reducing significant impacts associated with the project, and based on specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, that make infeasible the these project alternatives.

VIII. FINDINGS REGARDING GENERAL IMPACT CATEGORIES

Significant Irreversible Environmental Changes

As stated in CEQA Guidelines Section 15126.2(c), "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage

can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."

The Project would necessarily consume limited, slowly renewable and non-renewable resources. This consumption would occur during the construction phase of the Project and would continue throughout its operational lifetime. Project development 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. Project construction would require the consumption of resources that are non-replenishable or may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; and water. Furthermore, nonrenewable fossil fuels such as gasoline and oil would also be consumed in the use of construction vehicles and equipment, as well as the transportation of goods and people to and from the Project Site.

Project operation would continue to expend nonrenewable resources that are currently consumed within the City. These include energy resources such as electricity and natural gas, petroleum-based fuels required for vehicle-trips, fossil fuels, and water. Fossil fuels would represent the primary energy source associated with both construction and ongoing operation of the Project, and the existing, finite supplies of these natural resources would be incrementally reduced.

At the same time, the Project would contribute to a land use pattern that would reduce reliance on private automobiles and the consumption of non-renewable resources when considered in a larger context. Most notably, the Project would provide hotel and commercial uses in the Downtown Los Angeles area in close proximity to cultural and entertainment, commercial, restaurant, and office activities. The Project Site is located within a High Quality Transit Area, an area identified as preferred for high-density development to reduce vehicle miles traveled and related consumption of renewable resources, among other goals. Given its location, the Project would support pedestrian access to a considerable range of entertainment, employment, and commercial activities. The Project also provides access to the regional transportation system as the Project Site is located immediately west of the Metro Blue Line Pico Station across S. Flower Street and 0.7 mile southwest of the 7th Street/Metro Center Station. These factors would contribute to a land use pattern that is considered to reduce the consumption of non-renewable resources.

Furthermore, the Project would be designed to comply with the State and City green building standards. The Project would also comply with the Los Angeles Green Building Code, which builds upon and sets higher standards than those incorporated in the 2016 California Green Building Standard Code, or CALGreen. The Project would be constructed in compliance with the 2016 Title 24 California Green Building Standards that went into effect on January 1, 2017, and incorporate various sustainability features, including but not limited to low-flow plumbing fixtures in guestrooms and common areas, and landscaping that incorporates a plant palette of native and drought-tolerant plantings and uses low-flow irrigation. The Project would achieve several objectives of the City of Los Angeles General Plan Framework Element, Southern California Association of Governments Regional Transportation Plan, and South Coast Air Quality Management District Air Quality Management Plan for establishing a regional land use pattern that promotes sustainability.

The Project would support pedestrian activity in the downtown area and contribute to a land use pattern that reduces vehicle trips and air pollution by locating employment opportunities, restaurants and entertainment within walking distance and proximity to public transit. Further,

the Project's inclusion of bicycle parking, would encourage the use of alternative modes of transportation. Continued use of such non-renewable resources would 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 Site contains no energy resources that would be precluded from future use through Project implementation. The Project's irreversible changes to the environment related to the consumption of nonrenewable resources would not be significant.

Growth-Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

The Project would develop up to approximately 506,682 square feet of floor area within two hotel towers that would contain retail establishments, restaurants, and hotel lobby facilities that activate the pedestrian experience and adjoining street frontages. The Project would also contain rooftop uses designed to enhance the indoor-outdoor experience for hotel guests and visitors. Overall, the Project would provide up to 1,162 hotel rooms within two modern towers. The mixed-use Project would provide new employment and commercial opportunities within the Downtown Center, an area targeted for employment centers.

Since there are no proposed residential uses, the Project would only contribute to increasing employment opportunities. The Project would provide 594 new permanent employment positions. During construction, there would be a maximum of 218 temporary employees per day for all components of building (i.e., framing, plumbing, elevators, inspections, finishing). However, as stated in Attachment B of the Initial Study, provided in Appendix A-2 of the Draft EIR, the Project would not have indirect effects on growth through such mechanisms as the extension of roads and infrastructure, since the infill Project would use the existing transportation and utility infrastructure to serve the Project. The Project would include a mix of uses that would be compatible with adjacent uses and would be representative of the type of high-density and mixed-use hotel and retail development in the vicinity. The Project's increases in employment would provide a small contribution to anticipated growth for the Central City Community Plan area and the City as a whole.

The Project Site is located in an urbanized area that is served by current infrastructure (e.g., roads and utilities), and community service facilities. As stated in Section 4.11.1, Water Supply, of the Draft EIR, the Project would require construction of new, on-site water distribution lines to serve the new buildings. Installation of new water infrastructure would be limited to on-site water distribution and minor off-site work associated with connections to the public main. No upgrades to public water mains are anticipated. The Project would not require the construction of off-site infrastructure that would provide additional infrastructure capacity for other future development. It would not open inaccessible sites to new development other than existing opportunities for development that are already available.

Therefore, the Project would not spur additional growth other than that already anticipated and would not eliminate impediments to growth. Consequently, the Project would not foster growth-inducing impacts.

IX. OTHER CEQA CONSIDERATIONS

1. The City, acting through the Department of City Planning, is the "Lead Agency" for the project evaluated in 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, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services, transportation and traffic, utilities and service systems, energy, tribal cultural resources, alternatives, and other CEQA considerations. Additionally, the EIR considered, in separate sections, Significant Irreversible Environmental Changes and Growth Inducing Impacts. 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 decision makers and the public at large in their consideration of the environmental consequences of the project. The public review periods 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 periods and responds to comments made during the public review periods.

4. 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 responses 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.

5. The Final EIR documents changes to the Draft EIR. Having reviewed the information contained in the Draft EIR, the Final EIR, and 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 impact, substantial increase in the severity of a previously disclosed impact, significant new information in the record of proceedings or other criteria under CEQA that would require additional recirculation of the Draft EIR, or that would require preparation of a supplemental or subsequent EIR. Specifically, the City finds that:

    - 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.

- 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.

- 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.

6. The mitigation measures identified for the project were included in the Draft EIR and Final EIR. 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.

7. 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 and revised in the MMP as adopted by the City serve 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.

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

9. The custodian of the documents or other materials which constitute the record of proceedings upon which the City decision is based is the City of Los Angeles, Department of City Planning.

10. 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.

11. 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.

12. 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 the other regulatory jurisdictions.

X. STATEMENT OF OVERRIDING CONSIDERATIONS

The EIR identifies unavoidable significant impacts that would result from implementation of the project. Section 21081 of the California Public Resources Code and Section 15093(b) of the CEQA Guidelines provide that when a decision of a public agency allows the occurrence of significant impacts that are identified in the EIR, but are not at least substantially mitigated to an insignificant level or eliminated, the lead agency must state in writing the reasons to support its action based on the EIR and/or other information in the record. The State CEQA Guidelines require, pursuant to CEQA Guidelines Section 15093(b), 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 have been identified in the EIR that cannot be substantially mitigated to an insignificant level or be eliminated. These findings and the Statement of Overriding Considerations are based on the documents and materials that constitute the record of proceedings, including, but not limited to, the Final EIR and all technical appendices attached thereto.

Based on the analysis provided in Section IV, Environmental Impact Analysis, of the Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to: Noise (project-specific and cumulative construction noise that would exceed applicable standards) and Traffic and Transportation (project-specific and cumulative construction and operational traffic impacts that would conflict with the applicable measures of effectiveness for performance of the circulation system).

Accordingly, the City adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts would result from implementation of the project. Having (i) adopted all feasible mitigation measures, (ii) rejected as infeasible the alternatives to the project discussed above, (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 each of the project's benefits, as listed below, outweigh and override the significant unavoidable impacts relating to construction noise and construction and operational traffic.

The below stated reasons summarize the benefits, goals and objectives of the Project, and provide the detailed rationale for the benefits of the Project. These overriding considerations of economic, social, aesthetic, and environmental benefits for the Project justify adoption of the Project and certification of the completed EIR. Each of the following overriding consideration separately and independently (i) outweighs the adverse environmental impacts of the Project, and (ii) justifies adoption of the Project and certification of the completed EIR. In particular, achieving the underlying purpose for the Project would be sufficient to override the significant environmental impacts of the Project.

- **Site Redevelopment**. The Project would substantially improve the existing conditions on the Project Site, by transforming the site into a mixed-use hotel complex offering multiple hotel brands, incorporating a pedestrian-oriented building design, providing a substantially improved streetscape, increasing onsite landscaping, improving security and building lighting, and including vibrant signage that would enhance the aesthetic and character of the Project Site. In this respect, the Project is an opportunity to implement a redevelopment project strategically positioned adjacent to mass transit and with direct synergy with the Los Angeles Convention Center and the regional entertainment venues in the South Park district of the City.

- **Supports City's Hotel Goals.** The City has an established mandate to develop 8,000 hotel rooms within walking distance to the Los Angeles Convention Center, and the Project provides a material benefit to the City accomplishing this goal by contributing approximately

1,000 hotel rooms located directly across the street from the Los Angeles Convention Center. Hence, the Project is a substantial benefit for the City to become more competitive with other cities that attract large conventions and the related direct and indirect economic benefits.

- **Employment and Tax Revenue.** According to the City's Chief Legislative Analyst's reports, the Project would provide numerous construction and permanent jobs that would not exist under existing conditions. In addition, the Applicant has agreed to provide as part of the Project, a card check neutrality agreement with local unions to provide high-quality operational jobs on the Project Site, provide a living wage consistent with applicable policies for employees, enter into a project labor agreement with local trades groups for construction jobs, and provide room blocks agreements to the City for key events at the Los Angeles Convention Center and during the 2028 Olympic and Paralympic Games. Moreover, the Project would provide substantial economic benefits for the City as it would generate $14 million in its first year of operation (as compared to $174,000 annually) of public revenues. In addition, the Project would result in the generation of $158 million net present value of net new City revenues, such as transit occupancy taxes, sales tax, property tax and business tax revenues. Therefore, the Project has compelling and substantial financial and community benefits.

- **Smart Growth.** The Project is consistent with the City's current and long-term planning visions for the Project Site. The City desires to locate density near mass transit to reduce environmental impacts and implement smart growth planning decisions. This strategy is particularly relevant to reduce traffic, air quality, greenhouse gas, and health impacts that are caused by vehicular travel. The Project is adjacent to the Metro Pico Station, serving the Blue Line and Expo Line, and in the core of downtown Los Angeles. In these respects, the Project is consistent with planning goals and policies to improve the urban center, and results in a beneficial reduction in Vehicle Miles Travelled and related environmental and land use impacts.