

FINDINGS

A. General Plan Legislative Findings

1. General Plan Land Use Designation.

The project site is located within the West Los Angeles Community Plan area (effective July 27, 1999), which designates the property for General Commercial land uses with corresponding zones of C1.5, C2, CR, C4, RAS3, RAS4, and P.

The project involves the renovation of two existing 10-story office towers with 342,078 square feet and the addition of a 120,000 square-foot horizontal expansion that includes a two-story podium element that would connect the towers on floors two (2) through three (3), and connections between the towers on levels five (5), seven (7), and nine (9); and, the addition of ground floor dining uses. The 10th floor ceiling will be elevated to the height of the roof of the mechanical penthouse, thereby incorporating the mechanical space within the 10th floor. Additionally, updated outdoor and recreational amenities, including roof gardens and an outdoor recreation deck and pedestrian improvements along Olympic Boulevard would be provided. The existing two-10 story office towers are connected by a parking structure that includes 3 levels of above-grade and 2 levels of subterranean parking. Development of the project would increase the buildings' total square footage, adding 115,000 square feet of office and 5,000 square feet of restaurant uses to the existing 330,758 square feet of office and 11,320 square feet of retail. The total square footage would be 462,078 square feet. The height of the existing office towers shall be consistent with the approved plans dated September 12, 2018, and subject to Los Angeles Municipal Code Section 12.21.1 B. Upon completion, the Project would result in a total maximum floor area ratio (FAR) of 3:1.

The Height District applicable to the project site is Height District 1 which establishes a maximum FAR of 1.5:1. The requested General Plan Amendment is necessary to indicate that Height District 2 is applicable to the project site. Height District 2 establishes a maximum FAR of 6:1. The proposed 'D' Limitation will limit the site's overall FAR to 3:1.

The development is consistent with the applicable zoning regulations and land use policies of the West Los Angeles Community Plan, which aims to maximize development opportunities around future transit systems and to enhance the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance.

2. General Plan Text

- a. West Los Angeles Community Plan: The project is consistent with several goals, objectives, and policies of the West Los Angeles Community Plan. The plan text includes the following relevant office and commercial land use goals, objectives and policies:

Goal 2: A strong and competitive commercial sector which promotes economic vitality, serves the needs of the community through well designed safe and accessible areas while preserving historic and cultural character.

Objective 2-1: To conserve and strengthen viable commercial development and to provide additional opportunities for new commercial development and services within existing commercial areas.

Policy 2-1.1: New commercial uses shall be located in existing established commercial areas or shopping centers.

Policy 2-1.2: Protect commercially planned/zoned areas from encroachment by residential only development.

Policy 2-1.3: Ensure the viability of existing neighborhood stores and businesses which support the needs of local residential and are compatible with the neighborhood.

Objective 2-2: To promote distinctive commercial districts and pedestrian-oriented areas.

Policy 2-2.1: Encourage pedestrian-oriented design in designated areas and in new development.

Policy 2-2.5 Require that the first floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses.

Objective 1-3: To enhance the appearance of commercial districts.

Policy 2-3.1: Establish street identity and character through appropriate sign control, landscaping and streetscape improvements; and require that new development be compatible with the scale of adjacent neighborhoods.

Policy 2-3.2: Require that commercial projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with surrounding uses and development.

The project involves the renovation of two existing 10-story office towers with 342,078 square feet and the addition of a 120,000 square-foot horizontal expansion that includes a two-story podium element that would connect the towers on floors two (2) through three (3), and connections between the towers on levels five (5), seven (7), and nine (9); and, the addition of ground floor dining uses. Additionally, updated outdoor and recreational amenities, including roof gardens and an outdoor recreation deck and pedestrian improvements along Olympic Boulevard would be provided.

The project would redesign the existing office space and increase the buildings' total square footage, adding 115,000 square feet of office and 5,000 square feet of restaurant use to the existing 330,758 square feet of office and 11,320 square feet of retail. The redesigned and new office space and ground floor dining uses would modernize the 1980s office complex, creating an office building that is reflective of existing market demands. The additional square footage would increase employment opportunities for the surrounding residents and the new ground floor dining uses would diversify on-site uses and provide new dining opportunities for employees and surrounding residents.

The two existing office towers are setback 30-feet from Olympic Boulevard. Two large raised turf areas create a buffer between the two office towers and the sidewalk. Existing tenants' signage as well as a main planter with the site's address and office complex name "Trident Center" are located in the turf area. The existing signage, height, slope, and surrounding concrete walls, contribute to the unusable landscaped areas that front Olympic Boulevard. The project will reconfigure the street frontage along Olympic Boulevard, creating a varying setback and a more usable and accessible pedestrian experience.

The new varying setback will be a minimum of 27 feet along the western frontage and a minimum of 9 feet five inches along the eastern frontage. An exterior courtyard stairway will link the two towers and provide landings at each level with access to office space and parking levels. The dining uses on the ground floor and streetscape and landscape improvements will establish a strong street frontage identity and encourage pedestrian activity. The building facades adjacent to residential uses, along Purdue Avenue, Corinth Avenue, and Mississippi Avenue would maintain the existing scale and massing. The existing parking structure planters would be re-landscaped to minimize the appearance of the existing parking structure.

Goal 10: Develop a public transit system that improves mobility with convenient alternatives to automobile travel.

Objective 10-1: To encourage improved local and express bus service through the West Los Angeles Community area and encourage park-and-ride facilities to connect with freeways and high occupancy vehicle (HOV) facilities.

Objective 10-2: To increase the work trips and on-work trips made on public transit.

Policy 10-2.1: Develop an intermodal mass transportation plan to implement linkages to future mass transit service.

The project is 0.6 miles northwest of the Expo Sepulveda Light Rail Station. Additionally, more than 20 bus lines, including the Metro Local Bus, Metro Rapid Bus, Big Blue Bus, and Culver City Bus serve the Project Area. Mitigation measure MM TR-2 included in the Draft Environmental Impact Report would require the project applicant to provide a first and last mile connection to and from the Metro Expo Sepulveda Light Rail Station and project site. As described in MM TR-2, the shuttles would operate during peak hours and at frequencies no greater than five to six minutes.

- b. Framework Land Use Chapter: The Framework Element's Land Use chapter policy encourages the retention of the City's stable residential neighborhoods and proposes incentives to encourage whatever growth that occurs to locate in neighborhood districts, commercial and mixed-use centers, along boulevards, industrial districts, and in proximity to transportation corridors and transit stations. Land use standards and densities vary by location to reflect the local conditions and diversity and range from districts oriented to the neighborhood, the community, the region, and, at the highest level, the national and international markets.

The General Plan Framework identifies General Commercial as offering a “diversity of retail sales and services, office, and auto-oriented uses comparable to those currently allowed in the "C2" zone (including residential). They are located outside of districts, centers, and mixed-use boulevards and occur at the intersections of major and secondary streets, or as low rise, low-density linear "strip" development along major and secondary streets.”

The project supports and will be generally consistent with the General Plan Framework Land Use Chapter as it accommodates development of office and ground floor dining uses in accordance with the applicable policies of the West Los Angeles Community Plan. Specifically, the project will comply with the General Commercial Areas following goal, objective and policies set forth in the General Plan Framework Land Use Chapter:

Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential

neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more liveable city.

Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.

Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.

Policy 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.

Goal 3H: Lower-intensity highway-oriented and local commercial needs outside centers and districts.

Objective 3.12: Generally, maintain the uses, density, and character of existing low-intensity commercial districts whose functions serve surrounding neighborhoods and/or precluded from intensification due to their physical characteristics.

Policy 3.12.1: Accommodate the development of uses in areas designated as "General Commercial" in the community plans in accordance with Tables 3-1 and 3-7. The range and densities/intensities of uses permitted in any area shall be identified in the community plans.

The project involves the renovation of two existing 10-story office towers. The project would redesign the existing office space and increase the buildings' total square footage, adding 115,000 gross square feet of office and 5,000 gross square feet of restaurant use to the existing 330,758 square feet of office and 11,320 square feet of retail. The total square footage would be 462,078 square feet. The height of the existing office towers will remain. Upon completion, the Project would result in a total maximum floor area ratio (FAR) of 3:1.

The project site land use designation is General Commercial and is zoned [Q]C2-1. The Height District applicable to the project site is Height District 1 which establishes a maximum FAR of 1.5:1. The requested General Plan Amendment is necessary to indicate that Height District 2 is applicable to the project site. Height District 2 establishes a maximum FAR of 6:1.

The development is consistent with the applicable zoning regulations and land use policies of the West Los Angeles Community Plan, which aims to maximize development opportunities around future transit systems and to enhance the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance. The project would improve on-site pedestrian circulation and introduce ground floor dining uses and a plaza area, both of which would improve the pedestrian realm. Long and short term bicycle parking would be provided, 97 and 52 spaces, respectively.

The new office and ground floor dining uses' square footage would be focused along the Olympic Boulevard frontage. No changes would be made to the buildings' existing massing, scale, and/or character that are adjacent to the surrounding residential uses.

As discussed above the project is meeting the intent of the goals, policies and objectives of the West Los Angeles Community Plan.

- c. Health and Wellness Element: Plan for a Healthy Los Angeles, the Health and Wellness Element of the General Plan, seeks the promotion of a healthy built environment in a manner that enhances opportunities for improved health and well-being, and which promotes healthy living and working conditions. The project is consistent with the following policies:

Policy 2.2: Healthy building design and construction

“Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools, practices, and programs.”

The project would redesign the existing office space and increase the building's total square footage, adding 115,000 gross square feet of office and 5,000 gross square feet of restaurant use to the existing 330,758 square feet of office and 11,320 square feet of retail. New construction will comply with all LAMC regulations, including the Green Building Code, and will meet the Certified Leadership in Energy and Environmental Design (LEED) Green Building Rating System standards.

On-site pedestrian-oriented circulation would be improved with a ground floor plaza along Olympic Boulevard that would be open to the public. The proposed improvements to the Olympic Boulevard frontage would create a pedestrian-scale street front and a gateway to the project site. The on-site ground floor dining component would be designed to attract and increase pedestrian activity along Olympic Boulevard.

The project also includes 108,619 square feet of public and private open space, including the ground floor plaza, the recreation deck (on the roof of the parking structure), terrace bridges on the sixth, eighth, and tenth floors, and a fourth level roof garden.

The two existing 10-story office towers are clad with alternating horizontal bands of concrete and ceramic fritted vision glass. The two towers' building facades would be updated with a new glass façade, which would improve the interior lighting environment of each of floor.

The project will renovate an existing site developed with commercial uses and improve the on-site working conditions by promoting a pedestrian-friendly environment, providing improved passive and active recreation areas for employees, and providing a renovated office complex that allows natural light in the office space.

Policy 2.9: Community beautification

“Proactively work with residents and public, private, and nonprofit partners to develop, execute and maintain civic stewardship over community beautification efforts to promote neighborhoods that are clean, healthy, and safe.”

Policy 2.10: Social connectedness

“Acknowledge the mental and physical health benefits of social connectedness by promoting and valuing public spaces, social interaction, relationship building, and resilience in community and urban design.

Policy 3.8: Active spaces

“Support public, private, and nonprofit partners in the ongoing development of new and innovative active spaces and strategies to increase the number of Angelenos who engage in physical activity across ages and level of abilities.”

The proposed improvements to the buildings' façade, open space, and landscaping would be consistent with the Department of City Planning's Urban Design Studio 360 Design approach and would be reflected throughout the project site.

The proposed improvements would contribute to the beautification of the neighborhood and health and safety of the surrounding residential and commercial uses. The existing parking structure façade planters would be re-landscaped to mask the parking structure along Purdue Avenue, Mississippi Avenue, and Corinth Avenue. Additionally, the existing rear landscaped corners of the parking garage, along Mississippi Avenue would be repurposed as a dog park and pocket park. The two areas would include lighting that would not disturb the surrounding residential uses but would ensure the spaces can be used at night.

The buildings' existing massing adjacent to the residential uses would remain unchanged. The current pedestrian experience along Olympic Boulevard, in front of the project site is met with concrete retaining walls and an elevated unusable water-intensive lawn, rendering with no usable public open space.

The proposed ground floor dining uses and new office space would change the buildings' footprint along Olympic Boulevard. The new varying setback will be a minimum of 27 feet along the western frontage and a minimum of 9 feet five inches along the eastern frontage. An exterior courtyard stairway will link the two towers and provide landings at each level with access to office space and parking levels. The ground floor dining uses and plaza area would improve the overall vitality and character of Olympic Boulevard by creating a dedicated public space that could be used by surrounding residents, visitors and employees. The project will activate the Olympic Boulevard frontage with pedestrian-friendly uses and amenities and is providing a 360 degree ground floor landscape plan with usable space that complements the community and promote walkability in the neighborhood.

The existing rooftop recreation deck, located above the parking structure would be redesigned to include various amenities including a basketball court, outdoor private meeting areas, and artificial turf areas. The recreation deck would provide employees with dedicated areas that promote physical activity for employees as well as provide opportunities for conducting work activities, meetings and passive recreation, thereby promoting public spaces as a means of social interaction and physical health.

Policy 5.1: Air pollution and respiratory health

“Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.”

As stated above, the project area is served by more than twenty bus lines, including the Metro Local Bus, Metro Rapid Bus, Big Blue Bus, and Culver City Bus and is 0.6 miles northwest of the Expo Sepulveda Light Rail Station. Project employees and visitors would be within walking distance of retail, restaurants and jobs located along Olympic Boulevard and Sawtelle Japantown. In addition, the project would provide 149 total bicycle parking spaces and EV ready parking spaces, to encourage alternative means of transportation, thus reducing air pollution from vehicles.

During construction of the project PDF AQ-1 and PDF AQ-2 will require electricity and/or solar powered generators, rather than temporary diesel or gasoline generators to be used, when available, and off-road diesel-powered construction equipment that meet or exceeds the California Air Resources Board and US Environmental Protection Agency Tier 3 off-road emissions standards for equipment rate at 50 horsepower or greater during the grading, concrete pouring, and building construction phases. Additionally, mitigation measure MM TR-2 included in the Draft Environmental Impact Report would require the project applicant to provide a first and last mile connection to and from the Metro Expo Sepulveda Light Rail Station and project site. As described in MM TR-2, the shuttles would operate during peak hours and at frequencies no greater than five to six minutes. Lastly, the project the design of the new building incorporates features that are capable of achieving U.S. Green Building Council’s Leadership in Energy and Environmental Design (LEED) Silver standards. Such LEED® features shall include energy-efficient buildings, a pedestrian- and bicycle-friendly site design, and water conservation measures, among others.

Policy 5.7: Land use planning for public health and GHG emission reduction

“Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.”

The project includes bicycle parking, EV-ready spaces, use off-road diesel-powered construction equipment that meet or exceed the California Air Resource Board (CARB) and US Environmental Protection Agency (USEPA) Tier 3 off-road emissions standards for equipment rated at 50 horsepower or greater during specific construction phases, and where available, use of electricity from power poles and/or solar-powered generators rather than temporary diesel or gasoline generators to help reduce GHG emissions during operation of the project. Additionally, the project will be capable of achieving LEED

Silver standards and include sustainable design features include a low-water plant palette, high-efficiency toilets, high-efficiency Energy Star appliance will be installed, and use of proper hydro-zoning.

- d. Mobility Element: The project would not conflict with any of the applicable goals, objectives, and policies in the Mobility Plan 2035, the Mobility Element of the General Plan. The project is consistent with the five goals of the plan to provide:
1. Safety First

2. World Class Infrastructure
3. Access for All Angelenos
4. Collaboration, Communication and Informed Choices
5. Clean Environments & Healthy Communities

Pursuant to Mobility Plan 2035, the designations of the project's adjacent streets are: Mississippi Avenue, adjoining the project site to the north, is designated a Local Street-Standard and has a designated 60-foot designated right-of-way; Corinth Avenue, adjoining the project site to the east, is designated a Local Street-Standard and has a designated 60-foot right-of-way; Purdue Avenue, adjoining the project site to the west, is designated a Local Street-Standard and has a 60-foot right-of-way; and Olympic Boulevard, adjoining the project site to the south, is designated a Boulevard II and has a designated 110-foot right-of-way. Moreover, the Bureau of Engineering has not required any dedications and improvements on the surrounding roadways. Additionally, the project includes Project Design Feature TR-1 which would require the project applicant to implement a Construction Traffic Management Plan and Mitigation Measure TR-1 which would require implementation of a Transportation Demand Management Program and Mitigation Measure TR-2 which would require the project applicant to provide a shuttle between the Metro Expo Sepulveda Light Rail Station and the project site, to ensure transportation-related impacts associated with construction and operation of the project are less than significant.

The project site is within proximity to the following bus routes:

Bus Route	Service Area	Bus Stop Location
Big Blue Bus 5	Operates between Culver City to Santa Monica and travels along Olympic Boulevard within the study area.	A stop is located adjacent to the project site at Olympic Boulevard/Purdue Avenue.
Big Blue Bus 15	Operates in Los Angeles and travels along Bundy Drive, Centinela Avenue, Olympic Boulevard, and Pico Boulevard.	A stop is located five blocks west on Barrington Avenue, north of Olympic Boulevard.

The Mobility Plan 2035 designates the following streets in the Project area as bicycle routes:

- Santa Monica Boulevard (Class II)
- Gateway Boulevard (Class II)
- Sepulveda Boulevard (Class II)

The bicycle lanes on Gateway Boulevard and Santa Monica Boulevard have been installed; the bicycle lanes on Sepulveda Boulevard have not been installed.

Policy 1.2: Complete Streets

“Implement a balanced transportation system on all streets, tunnels, and bridges, using complete streets principles to ensure the safety and mobility of all users.”

The Project is designed to promote pedestrian, bicycle, and transit use. The Project's proximity to major transit corridors and several public transit options would encourage multimodal public transit commuting to the site, as well as implementation of Mitigation

Measure TR-2 which would provide a shuttle between the project site and Metro Expo Sepulveda Light Rail Station.

The Project would provide 97 long-term and 52 short-term bicycle parking spaces to facilitate bicycle commuting. The proposed expansion of the buildings' footprints would include enhanced landscaping and create a new presence along the Olympic Boulevard that would improve and activate the pedestrian-oriented streetscape.

Policy 1.6: Multi-Modal Detour Facilities

"Design detour facilities to provide safe passage for all modes of travel during times of construction."

Implementation of Project Design Feature TR-1 would require a Construction Traffic Management Plan to be submitted to the City of Los Angeles Department of Transportation for approval. The Construction Traffic Management Plan would formalize how construction activities, including infrastructure detours would be carried out and identified.

Policy 2.3: Pedestrian Infrastructure

"Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment."

Project employees and visitors would be within walking distance of retail, restaurants and jobs located along Olympic Boulevard and Sawtelle Japantown. The ground level improvements proposed along Olympic Boulevard, including the plaza area would improve on-site pedestrian circulation. Additionally, the proposed ground floor dining uses would provide a pedestrian-friendly gateway into the project site.

Policy 3.1: Access for All

"Recognize all modes of travel, including pedestrian, bicycle, transit and vehicular modes- including goods movement- as integral components of the City's transportation system."

Policy 3.4: Transit Services

"Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services."

Policy 3.5: Multi-Modal Features

“Support “first-mile, last-mile solutions” such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.”

Policy 3.8 Bicycle Parking

“Provide bicyclists with convenient, secure and well maintained bicycle parking facilities.”

As described above the project would improve on-site pedestrian-oriented infrastructure, provide secured long and short term bicycle parking, and encourage public transportation use by providing a shuttle to and from the project site and the Metro Expo Sepulveda Light Rail Station.

- e. Sewerage Facilities Element: Improvements may be required for the construction or improvement of sewer facilities to serve the subject project and complete the City sewer system for the health and safety of City inhabitants, which will assure compliance with the goals of this General Plan Element. Moreover, the Bureau of Engineering has requested that the project applicant submit a request to the West Los Angeles District Office of the Bureau of Engineering to determine the capacity and conditions of the existing sewers in the area.

City Charter Compliance – General Plan Amendment

1. **Charter Compliance - City Charter Section 555 (General Plan Amendment)**. The proposed General Plan Amendment complies with the procedures as specified in Section 555 of the Charter, including:
 - a. **Amendment in Whole or in Part**. The General Plan Amendment before the City Planning Commission represents an Amendment in Part of the West Los Angeles Community Plan. The project site is currently designated for General Commercial land uses and is zoned [Q]C2-1. Height District 1 is applicable to the project site and establishes a maximum FAR of 1.5:1.

By recommending approval of the General Plan Amendment, the project would be able to be relieved of the constraints of the ordinance restricting FAR to 1.5:1 which would allow for the redesign and rehabilitation of the existing office space and would allow the applicant to increase the buildings' total square footage by adding 115,000 gross square feet of office and 5,000 gross square feet of restaurant use to the existing 330,758 square feet of office and 11,320 square feet of retail, thereby allowing for the modernization of the project site to standards often sought by modern office building tenants. The total square footage would be 462,078 square feet. The height of the existing office towers will remain unchanged. Upon completion, the Project would result in a total maximum floor area ratio (FAR) of 3:1. The requested General Plan Amendment is necessary to indicate that Height District 2 is applicable to the project site, as Height District 1 establishes a maximum FAR of 1.5:1. Height District 2 establishes a maximum FAR of 6:1, however the project will include a D Limitation to ensure that the project's maximum FAR is 3:1.

The existing development was built in 1983 when commercial development in Height District 1 was limited to a 3:1 FAR. The development was consistent with Height District 1 as its total buildout was less than the maximum 3:1 FAR. The passage of Proposition

U in the mid-1990's, which cut the commercial FAR in Height District 1 to 1.5:1 effectually made the entire development non-conforming as to FAR. The requested General Plan Amendment restores the stie to its pre-existing 3:1 FAR and makes the existing structures conforming as to its Height District. The proposed General Plan Amendment will also allow for the squaring off of the existing floor plates to a more modern open plate with additional above ground connections between the buildings to make the existing and new space in the structures more accessible to each other.

The proposed 3:1 FAR will be consistent with the surrounding buildings' FAR including the following properties:

- 11444 and 11400 West Olympic Boulevard, 11 and 16 stories, 5.6:1 and 5:1 FAR;
- 11300 West Olympic Boulevard, 9 stores, 3.4:1 FAR; and
- 11150 West Olympic Boulevard; 12 stories, 3.3:1 FAR.

Additionally, since construction of the original buildings in 1983, and with the introduction of the Metro Expo Line Light Rail development in the surrounding area has changed and density has increased. This change is in part, due to, response to modern office tenant's demands, that office space be located in close proximity to transit and commercial areas and provide outdoor gathering areas. The project would be consistent with the General Plan Framework's guidance to permit new development that maintains the existing scale and character of the City's residential neighborhoods and enhances the character of the commercial districts and the Framework's guidance of locating density and jobs near transit. The project site is 0.6 miles northwest of the Metro Expo Sepulveda Light Rail Station and in accordance with MM TR-2, including the Draft EIR, the project will provide direct shuttle service to and from the site and station. (The Height District redesignation reflects the changing development patterns in the City, specifically locating high density, mixed-use developments near transit lines).

As stated above, the height of the two existing towers would remain the same and the buildings' existing massing adjacent to the residential uses would remain unchanged. The proposed ground floor dining uses and new office space would change the buildings' footprint along Olympic Boulevard and would reduce the existing setback. The new varying setback will be a minimum of 27 feet along the western frontage and a minimum of 9 feet five inches along the eastern frontage. An exterior courtyard stairway will link the two towers and provide landings at each level with access to office space and parking levels. The existing pedestrian experience surrounding the project site is met with concrete retaining walls and elevated, unusable water-intensive lawn, providing no usable open space. The site is isolated from the community, does not provide any inviting pedestrian features along the perimeter of the project and does not provide connections to Olympic Boulevard and/or Sawtelle Japantown (one block east of the site). The ground floor dining uses and plaza area would improve the overall vitality and character of Olympic Boulevard by creating a dedicated public space that could be used by surrounding residents, visitors and employees.

In terms of physical identity, the project will represent a change to the physical and economic identity of the project site in that it's located on one of the largest parcels in the area, proximate to a light rail station and reflects the changing developing patterns in the City. Additionally, the project will result in a land use development pattern that emphasizes on-site pedestrian connectivity and pedestrian connectivity to the adjacent commercial uses along Sawtelle Boulevard. The project would create a precedent for future office uses along the Olympic Boulevard corridor to include ground floor dining uses, plaza areas, and reduced setbacks along Olympic Boulevard. Additionally, by extending the building footprint towards Olympic Boulevard and providing ground floor

dining uses and a plaza area with landscaping and seating, the project would activate the street and provide a gathering space for visitors and employees.

In addition to improving pedestrian access and circulation to the site, the project also has a unique and significant identity as an office development with ample access to multimodal modes of transit. The project is 0.6 miles northwest of the Expo Sepulveda Light Rail Station. Additionally, more than twenty bus lines, including the Metro Local Bus, Metro Rapid Bus, Big Blue Bus, and Culver City Bus serve the Project Area. Mitigation measure MM TR-2 included in the Draft Environmental Impact Report would require the project applicant to provide a first and last mile connection to and from the Metro Expo Sepulveda Light Rail Station and project site.

The instant request provides the City an opportunity to improve the site which is developed with a 1980s office complex that was developed for former tenants with individual offices and odd building angles to maximize corner office spaces, creating an office building that is reflective of existing market demands which request large floor plates, open floors, and private offices, improves the on-site pedestrian circulation, increases density and job opportunities near transit. Specifically, the proposed Height District Change allows the construction of 115,000 gross square feet of office and 5,000 gross square feet of restaurant use under the corresponding C2 Zone. Redesignating the Height District of the project site reinforces the General Plan Framework's guidance of locating density and jobs near transit. The redesignation also reflects changing development patterns in the City, specifically locating high density developments near transit lines as supported by the General Plan.

Thus, approval of the General Plan Amendment to Footnote 1 of the West Los Angeles Community Plan, will allow Height District 2 be applicable to the project site in order to implement the vision of the West Los Angeles Community Plan to create a significant and important social, physical and economic identity for the area with the construction of the office and commercial project. It will allow a 1980's office building to be improved with pedestrian scale development, ground floor dining uses that will be accessible to employees and surrounding residents, and increase the number of jobs and density near transit, as supported by the General Plan Framework and the Community Plan and make two non-conforming buildings once again conforming to their zone.

- b. **Initiation of Amendments.** In compliance with this sub-section, the Director of Planning initiated the amendment to the West Los Angeles Community Plan (General Plan Land Use Element), pursuant to the memo dated March 2, 2015.
- c. **Commission and Mayoral Recommendations.** The noticing and hearing requirements of the General Plan Amendment were satisfied, pursuant to LAMC Section 12.32 C.3. The hearing was scheduled, duly noticed, and held in City Hall on June 27, 2018. The City Planning Commission shall make its recommendation to the Mayor upon a recommendation of approval, or to the City Council and the Mayor upon a recommendation of disapproval.

This action is further subject to the following sections of Charter Section 555:

- d. **Council Action.** The Council shall conduct a public hearing before taking action on a proposed amendment to the General Plan. If the Council proposes any modification to the amendment approved by the City Planning Commission, that proposed modification shall be referred to the City Planning Commission and the Mayor for their recommendations. The City Planning Commission and the Mayor shall review any modification made by the Council and shall make their recommendation on the modification to the Council in accordance with subsection (c) above. If no modifications

are proposed by the Council, or after receipt of the Mayor's and City Planning Commission's recommendations on any proposed modification, or the expiration of their time to act, the Council shall adopt or reject the proposed amendment by resolution within the time specified by ordinance.

- e. **Votes Necessary for Adoption.** If both the City Planning Commission and the Mayor recommend approval of a proposed amendment, the Council may adopt the amendment by a majority vote. If either the City Planning Commission or the Mayor recommends the disapproval of a proposed amendment, the Council may adopt the amendment only by a two-thirds vote. If both the City Planning Commission and the Mayor recommend the disapproval of a proposed amendment, the Council may adopt the amendment only by a three-fourths vote. If the Council proposes a modification of an amendment, the recommendations of the Commission and the Mayor on the modification shall affect only that modification."

2. **Charter Finding – City Charter Finding 556.** When approving any matter listed in Section 558, the City Planning Commission and the City Council shall make findings showing that the action is in substantial conformance with the purposes, intent, and provisions of the General Plan. If the City Council does not adopt the City Planning Commission's findings and recommendations, the Council shall make its own findings.

The project site is located along Olympic Boulevard adjacent to the Sawtelle Japantown neighborhood within the West Los Angeles Community Plan, which is one of 35 community plans comprising the Land Use Element of the General Plan. The area is a unique community in that it is a mix of commercial uses along Olympic Boulevard and residential uses to the north and south. The Community Plan designates the project site for General Commercial land uses, corresponding to the C2 Zone. The site is currently zoned [Q]C2-1. The existing office and retail uses are in conformance with the Commercial land use designation and the proposed additional office use and ground floor dining uses will be in compliance with the General Commercial Use.

Thus a General Plan Amendment is necessary to indicate that Height District 2 is applicable to the project site, as Height District 1 establishes a maximum FAR of 1.5:1. Height District 2 establishes a maximum FAR of 6:1, however the project will include a D Limitation to ensure that the project's maximum FAR is 3:1. If approved, the project site will be zoned (Q)C2-2D.

The General Plan Amendment and Zone and Height District Change are needed for the proposed project given that Height District 1 is applicable to the site, which establishes a maximum FAR of 1.5:1. The proposed 120,000 gross square footage will increase the on-site FAR to 3:1. Thus, a General Plan Amendment is needed to amend Footnote 1 of the West Los Angeles Community Plan. As stated above, the proposed 3:1 FAR will be consistent with surrounding properties along Olympic Boulevard, including those located at:

- 11444 and 11400 West Olympic Boulevard, 11 and 16 stories, 5.6:1 and 5:1 FAR;
- 11300 West Olympic Boulevard, 9 stories, 3.4:1 FAR; and
- 11150 West Olympic Boulevard; 12 stories, 3.3:1 FAR.

Additionally, since construction of the original buildings in 1983, and with the introduction of the Metro Expo Line Light Rail development in the surrounding area has changed and density has increased. This change is in part, due to, response to modern office tenant's demands, that office space be located in close proximity to transit and commercial areas and provide outdoor gathering areas. The project would be consistent with the General

Plan Framework's guidance to permit new development that maintains the existing scale and character of the City's residential neighborhoods and enhances the character of the commercial districts and the Framework's guidance of locating density and jobs near transit. The project site is 0.6 miles northwest of the Metro Expo Sepulveda Light Rail Station and in accordance with MM TR-2, including the Draft EIR, the project will provide direct shuttle service to and from the site and station. (The Height District redesignation reflects the changing development patterns in the City, specifically locating high density, mixed-use developments near transit lines).

Thus, the General Plan Amendment and Zone and Height District Change are needed for the proposed project given that the proposed use does not qualify for the Adaptive Reuse of the historic structure because the Adaptive Reuse Ordinance does not apply to the adaptive reuse of M-zoned properties that are located outside of the Central City Community Plan. The existing M-zoned properties containing live-work uses surrounding the project site were able to use a Zoning Administrator's Determination, pursuant to subsection 12.24-X,13 for Joint Living and Work Quarters in M zones that are located outside of the Central City Community Plan Area. However, this provision may not be applied to hotels which, while considered a residential use, are not able to apply for Joint Living and Work Quarters.

The initiated General Plan Amendment, Zone and Height District Change to re-designate the project site from [Q]C2-1 to (Q)C2-2D would be consistent with the overarching goals of the General Plan Framework's guidance to permit new development that maintains the existing scale and character of the City's residential neighborhoods and enhances the character of the commercial districts and the Framework's guidance of locating density and jobs near transit. The project site is 0.6 miles northwest of the Metro Expo Sepulveda Light Rail Station and in accordance with MM TR-2, including the Draft EIR, the project will provide direct shuttle service to and from the site and station. (The Height District redesignation reflects the changing development patterns in the City, specifically locating high density, mixed-use developments near transit lines). As such, the initiated General Plan Amendment, Zone and Height District Change are in substantial conformance with the purpose, intent, and provisions of the General Plan to strengthen the commercial and economic base of the Community Plan Area while preserving its historic resources.

3. **Charter Finding – City Charter Finding 558.** The initiated General Plan Amendment to the West Los Angeles Community Plan will be in conformance with public necessity, convenience, general welfare, and good zoning practice, as described below.

Public necessity, convenience, and general welfare of the West Los Angeles Community Plan will be better served by adopting the initiated General Plan Amendment and recommended Zone and Height District Change as they would allow for the renovation of an outdated 1980's office campus into modern and updated office and ground floor dining space that will result in future job-creating office space in an area in close proximity to transit. Additionally, the project will create new public open space that will include a dog park, a pocket park, and a ground floor landscaped plaza with seating. The proposed project will better serve the needs of the future employees, by offering updated private open space areas and new office space, with update aesthetics and a design that meets current office tenant demands. Further, no changes will be made to the existing massing and density of the structures that are adjacent to the residential uses along Purdue Avenue, Corinth Avenue, and Mississippi Avenue; the new square footage will be located along Olympic Boulevard. The proposed ground floor dining uses will provide new dining opportunities for the surrounding residences and on-site employees, all of which will be in proximity to transit.

As such, the General Plan Amendment, Zone and Height District Change will permit the renovation of existing outdated office space, additional new modern office space, and new ground floor dining uses. As discussed above, the proposed project's FAR of 3:1 will be consistent with several existing office towers along Olympic Boulevard. As such, the project is in conformity with public necessity, convenience, general welfare and good zoning practice given that the new density will be located along Olympic Boulevard and will result in office space that meets tenant's current demands, is consistent and complementary to the uses surrounding the project site and offers amenities to employees and surrounding residences.

B. Entitlement Findings

1. Zone and Height District Change Findings and "Q" Classification and "D" Development Limitations Findings

- a. Pursuant to L.A.M.C. Section 12.32.C.7, and based on these Findings, the recommended action is deemed consistent with the General Plan and is in conformity with public necessity, convenience, general welfare and good zoning.**

The project includes a Zone and Height District Change for the entire project site from [Q]C2-1 to (T)(Q)C2-2D. Approval of the Zone Change will replace the existing [Q] conditions, which includes square footage, height, and setback maximums, restricted vehicular ingress and egress points, and parking minimums. The proposed Zone and Height District Change maintains the existing regulations of the underlying C2 Zone and retains the existing zoning on the project site. The proposed Zone and Height District Change is only necessary to reflect the proposed FAR to effectuate the project. The Height District applicable to the project site is Height District 1 which once allowed a 3:1 FAR prior to the passage of Proposition U. The requested Zone and Height District Change is necessary to indicate that Height District 2 is applicable to the project site. Height District 2 establishes a maximum FAR of 6:1 to be limited to the site's former 3:1 FAR and which will result in two non-conforming buildings once again becoming conforming.

The project will be developed within the allowable density, floor area, height, and setback regulations of the existing zone, inclusive of the requested Height District Change. The project will redesign the existing office space and increase the buildings' total square footage, adding 115,000 gross square feet of office and 5,000 gross square feet of restaurant use to the existing 330,758 square feet of office and 11,320 square feet of retail. The total square footage would be 462,078 square feet. The height of the existing office towers will remain. Upon completion, the Project would result in a total maximum FAR of 3:1. Structures along Olympic Boulevard include a mix of low, mid and high-rise development.

A public necessity exists for modernized office space, to ensure the area remains commercial viable. Consistent with the surrounding high rise developments along Olympic Boulevard, the new square footage would be located along Olympic Boulevard reducing the frontage setback. The new varying setback will be a minimum of 27 feet along the western frontage and a minimum of 9 feet five inches along the eastern frontage. An exterior courtyard stairway will link the two towers and provide landings at each level with access to office space and parking levels. While existing high-rise office developments in the project area do not include ground floor dining uses, the proposed ground floor dining uses will establish a precedent that is consistent with the policies of the General Plan Framework Element and West Los Angeles Community Plan, and will enhance the pedestrian environment along Olympic Boulevard and encourage pedestrian connections with the

existing retail and dining uses along Sawtelle Boulevard. Further, the proposed change will encourage commercial corridors to include active and pedestrian-friendly uses.

No new square footage is proposed along Mississippi Avenue and the buildings' height will not change. Approximately half of the 115,000 square feet of office space will be created by squaring off the two existing towers and adding new connecting bridges on the fifth, seventh, and ninth floors. The remaining office square footage will be created by constructing a two-story podium that would link the two towers on floors two and three, along Olympic Boulevard.

The two-story podium element will create a transition between the existing office towers and the single-story bank and church, located west and east of the project site, along Olympic Boulevard as well as the lower density residential neighborhoods to the north of the site (along Purdue Avenue and Corinth Avenue). An eight-story high-rise office building is located across Olympic Boulevard to the south and is in the M2-1 Zone. An additional eight-story building is located approximately half a block east of the project site and a twenty-story building is located approximately half a block west of the project site, both are in the M2-1 Zone and are located on the south side of Olympic Boulevard.

Single and two-story multi and single-family residential uses are located north of the project site and are in the R2-1 Zone. Single-family residential are also located to the west across Purdue Avenue and are located east across Corinth Avenue and are in the R2-1 Zone. The Japanese Institute of Sawtelle, a single-story structure is also located east, across Corinth Avenue. The project site is well served by several bus lines. The project will further contribute to the concentration of similar land uses, including the incorporation of ground floor uses that encourage pedestrian activity and encourages the use of public transit in a transit rich location, in the vicinity and the City finds that the Zone Change will be in conformity with public necessity, convenience, general welfare and good zoning.

ADDITIONAL FINDINGS FOR A' Q' QUALIFIED CLASSIFICATION and D LIMITATIONS:

b. The project will protect the best interests of and assure a development more compatible with the surrounding property or neighborhood.

The project is consistent with the development standards of the existing underlying zoning of the project site, inclusive of the approval of the requested Height District 2. Pursuant to the proposed Development Limitation the project site would have an allowable FAR of 3:1. Without the Development Limitation, the project site will be zoned C2-2 which will allow a 6:1 FAR. The project represents a scale and intensity of development that was not only contemplated by the West Los Angeles Community Plan, but which is compatible with adjacent land uses, which consists of single and two-story residential uses and, low, mid and high-rise commercial structures.

The project will modernize the two existing 10-story office towers on the project site and will include a 120,000 square-foot expansion that consists of 115,000 square feet of office uses and 5,000 square feet of ground floor dining uses. The modernized office building will promote the West Los Angeles Community Plan's goals and policies of encouraging a strong and competitive commercial section which is compatible with the surrounding neighborhood. In addition, the project meets the following additional goals, policies, and objectives of the West Los Angeles community plan:

Goal 2: A strong and competitive commercial sector which promotes economic vitality, serves the needs of the community through well designed safe and accessible areas while preserving historic and cultural character.

Objective 2-1: To conserve and strengthen viable commercial development and to provide additional opportunities for new commercial development and services within existing commercial areas.

Policy 2-1.1: New commercial uses shall be located in existing established commercial areas or shopping centers.

Policy 2-1.2: Protect commercially planned/zoned areas from encroachment by residential only development.

Policy 2-1.3: Ensure the viability of existing neighborhood stores and businesses which support the needs of local residential and are compatible with the neighborhood.

Objective 2-2: To promote distinctive commercial districts and pedestrian-oriented areas.

Policy 2-2.1: Encourage Pedestrian-oriented design in designated areas and in new development.

Policy 2-2.5 Require that the first floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses.

Objective 1-3: To enhance the appearance of commercial districts.

Policy 2-3.1: Establish street identity and character through appropriate sign control, landscaping and streetscape improvements; and require that new development be compatible with the scale of adjacent neighborhoods.

Policy 2-3.2: Require that commercial projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with surrounding uses and development.

The “Q” Conditions and “D” limitations will ensure that the project is constructed as approved herein and subject to the mitigation measures and project design features identified in the EIR. The project will promote a pedestrian-oriented design, will incorporate restaurant uses on the ground floor, will enhance the appearance of Olympic Boulevard and the general commercial district, and will establish street frontage that is compatible with the scale of adjacent neighborhoods.

c. The project will secure an appropriate development in harmony with the objectives of the General Plan.

The West Los Angeles Community Plan Generalized Land Use Map designates the project site, as well as parcels to the east and west along the northern side of Olympic Boulevard, for commercial uses. The project promotes and is consistent with the intensity and pattern of development of General Commercial land use areas along the north and south side of Olympic Boulevard, which is characterized by the West Los Angeles Community Plan as “developed with high rise office buildings.” As discussed above, the proposed Development Limitation is necessary to ensure that the site’s maximum FAR is 3:1 and not 6:1 as permitted under Height District 2.

The General Plan Framework identifies General Commercial as offering a “diversity of retail sales and services, office, and auto-oriented uses comparable to those currently allowed in

the "C2" zone (including residential). They are located outside of districts, centers, and mixed-use boulevards and occur at the intersections of major and secondary streets, or as low rise, low-density linear "strip" development along major and secondary streets." The project is consistent with the C2 Zoning Designation and will include office and ground floor dining uses.

The project supports and will be generally consistent with the General Plan Framework Land Use Chapter as it accommodates development of commercial uses (office and dining) in accordance with the applicable policies of the West Los Angeles Community Plan. Specifically, the project will comply with the General Commercial following goal, objective and policies set forth in the General Plan Framework Land Use Chapter:

Goal 3H: Lower-intensity highway-oriented and local commercial needs outside centers and districts.

Objective 3.12: Generally, maintain the uses, density, and character of existing low-intensity commercial districts whose functions serve surrounding neighborhoods and/or precluded from intensification due to their physical characteristics.

Policy 3.12.1: Accommodate the development of uses in areas designated as "General Commercial" in the community plans in accordance with Tables 3-1 and 3-7. The range and densities/intensities of uses permitted in any area shall be identified in the community plans.

The project is providing 115,000 gross square feet of office and 5,000 gross square feet of restaurant use to the existing 330,758 square feet of office and 11,320 square feet of retail. The project will be developed within the allowable density, floor area, height, and setback regulations of the existing C2 Zone, inclusive of the requested Height District Change. Upon completion, the Project would result in a total maximum FAR of 3:1. The height of the existing 10-story office towers will remain. Structures along Olympic Boulevard include a mix of low, mid and high-rise development, including two eight-story office buildings located adjacent to the project site, across Olympic Boulevard and a twenty-story building which is located approximately half a block west of the project site. As proposed, the project is meeting the intent of the goals, policies and objectives of the West Los Angeles Community Plan.

The project will provide an appropriate development that is in harmony with the General Plan by supporting many of the land use goals, objectives and policies identified in the West Los Angeles Community Plan.

Objective 2-1: To conserve and strengthen viable commercial development and to provide additional opportunities for new commercial development and services within existing commercial areas.

Objective 2-2: To promote distinctive commercial districts and pedestrian-oriented areas.

Objective 1-3: To enhance the appearance of commercial districts.

The project will: provide a viable commercial development, promote a distinctive commercial development with pedestrian-oriented uses, and overall enhance the appearance of Olympic Boulevard.

- d. **The project will prevent or mitigate potential adverse environmental effects of the zone change and/or height district change.**

The project is requesting a zone change from [Q]C2-1 to (T)(Q)C2-2D. With implementation of the proposed mitigation measures, the EIR did not identify any areas where impacts would result in significant and unavoidable impacts. The project has been conditioned herein to comply with all Project Design Features, Mitigation Measures and the Mitigation Monitoring Program of environmental impact report, Case No. ENV-2016-1463-EIR (SCH No. 2017011045).

2. Conditional Use - “Major” Development Project Findings

- a. Pursuant to 12.24 U.14, and based on these Findings, the project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city, or region.**

The findings for a “Major” Development Project Conditional Use Permit apply to a project creating 250 or more hotel guest rooms, and 100,000 square feet or more of floor area in other nonresidential uses in the C2 Zone. The West Los Angeles Community Plan Generalized Land Use Map designates the project site as well as parcels to the east and west along the northern side of Olympic Boulevard for commercial uses. The project promotes and is consistent with the intensity and pattern of development of General Commercial land use areas along the north and south side of Olympic Boulevard, which is characterized by the West Los Angeles Community Plan as “developed with high rise office buildings.”

The project will modernize the two existing 10-story office towers and will introduce 5,000 square feet of new ground floor dining uses and 115,000 square feet of additional office uses, thereby improving the pedestrian connectivity between the site and Olympic Boulevard by expanding the buildings’ footprint and reducing the setback along Olympic Boulevard. The project proposes to heavily landscape the ground floor plaza, existing parking structure planters and will include the creation of a community dog park located at the northwest corner of the development, near residentially-zone parcels. The project will provide new jobs in proximity to transit, including the Metro Expo Sepulveda Light Rail Station and several bus routes, and will allow the project to function as a node connecting residents to the regional rail transportation network while providing high-quality space for a growing employment base. Additionally, the existing structures’ massing and density that is adjacent to the surrounding residential neighborhood (east and west of the site) will be maintained. In addition, the project will provide new restaurant space that both office building tenants and surrounding residents can use. Therefore, the project helps perform a function or provide a service that is essential or beneficial to the community, City, or region. Specifically, the Project will renovate the existing 1980’s office space improving the site’s overall sustainability, modernize the site’s aesthetics, and improve the pedestrian environment by providing new ground floor dining uses and office along Olympic Boulevard (away from the existing and adjacent residential uses), thereby supporting the West Los Angeles Community Plan’s objectives and policies to ensure the City’s long-term fiscal and economic viability, generally maintain the density and uses of commercial areas whose functions serve surrounding neighborhoods, and accommodate development in areas designated for General Commercial uses. As such, the project will perform a function and provide a service that is essential and beneficial to the community, City, and the region as a whole.

- b. The project’s location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.**

The project involves the modernization of two existing 10-story office towers and the addition of a 120,000 square-foot expansion that includes connecting the towers on levels 5, 7, and 9; a two-story podium element that would connect the towers on floors two through three; and the addition of ground floor dining uses. Additionally, updated outdoor and recreational amenities, including roof gardens and an outdoor recreation deck and pedestrian improvements along Olympic Boulevard would be provided. The existing two 10-story office towers are connected by a parking structure that includes three levels of above-grade and two levels of subterranean parking. Development of the project would increase the buildings' total square footage, adding 115,000 gross square feet of office and 5,000 gross square feet of restaurant use to the existing 330,758 square feet of office and 11,320 square feet of retail. The total square footage would be 462,078 square feet. The height of the existing office towers will remain. Upon completion, the Project will result in a total maximum FAR of 3:1.

Adjacent properties on the south side of Olympic Boulevard include low- to medium-rise office buildings; industrial and commercial buildings; and surface parking lots. These properties are designated Light Manufacturing and are zoned M2-1. There is a church is located at the corner of Purdue Avenue and Olympic Boulevard across from the project site. Properties to the west are designated Low Medium I Residential and General Commercial and are zoned R2-1 and C2-1, respectively. A bank, with associated surface parking, multi-family residences, the Japanese Institute of Sawtelle and the Sawtelle Judo School are located along Corinth Avenue across from the project site to the east. Properties to the east are designated for Low Medium I Residential and Neighborhood Commercial land uses and are zoned R2-1 and C2-1VL, respectively.

The project site is zoned C2-1 and is designated for General Commercial land uses, which allow for the current office and retail uses on the site. If approved, the Zone and Height District Change will allow for the modernization of an existing office complex with additional office and new ground floor dining uses that will operate simultaneously and will be compatible with the existing office and retail uses along Olympic Boulevard. The height and massing of the existing towers will remain unchanged in areas that are adjacent to the residential uses. Approximately half of the additional office space would be created by squaring off the two existing towers and adding new connecting bridges on the fifth, seventh, and ninth levels. The remaining office space would be created by adding a two-story podium element that would connect the two towers on the second and third floors, and provide open space for tenants on the fourth level. The net square footage will be located along the site's Olympic Boulevard frontage and will create a more active street frontage while also maintaining the buildings' existing massing and density that is adjacent to the residential neighborhood.

The project's proposed 120,000 square feet of office and ground floor dining area will be compatible with the existing uses, consistent with the West Los Angeles Plan's goal to create a strong and competitive commercial sector. The approval of the Height District will not adversely affect or further degrade adjacent uses or properties because it enables the development of uses that help achieve the West Los Angeles Plan's objective to promote distinctive commercial districts and pedestrian-oriented areas. Additionally, while the Height District 2 designation permits a 6:1 FAR, the project is proposing a Development Limitation to restrict the site's FAR to 3:1.

The proposed ground floor dining uses will be complimentary to the nearby retail and restaurant uses located in Sawtelle Japantown and its proximity to Metro's Expo Sepulveda Light Rail Station and bust stops will reduce vehicle miles traveled, thereby reducing air pollution. In addition, the proximity of the Expo Line Station allows the project to function as a node connecting employees and visitors to the regional rail transportation network while providing high-quality commercial space for a growing employment base and a destination

for local residents and visitors to find neighborhood-serving amenities. Therefore, the project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

c. The project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan, and any applicable specific plan.

The project site is designated as General Commercial in the West Los Angeles Community Plan Area. General Commercial areas in the Community Plan Area are made up of a mix of low, mid, and high-rise strip development on major arterials, including Olympic Boulevard. Commercial uses are free standing or mini-mall type buildings designed to primarily serve local neighborhoods. The ultimate goal of the Community Plan for commercial designated areas is to create "A strong and competitive commercial sector which promotes economic vitality, serves the needs of the community through well designed, safe and accessible areas while preserving historic and cultural character." The project substantially conforms with this goal of the Community Plan as it will renovate the existing 1980's office space improving the site's overall sustainability and economic vitality by making it more attractive to modern businesses seeking state-of-the-art office spaces, modernize the buildings' aesthetics, serve a community need by providing new ground floor dining uses, and improve the pedestrian environment by reducing the existing 30-foot setback along Olympic Boulevard and creating a plaza area. The project also advances the policies of the Community Plan by designing a project that is compatible with the adjacent residential neighborhood, improves on-site and surrounding pedestrian circulation, and reflects high quality design and a distinctive character. Specifically, the development of the project is consistent with and will advance the following objectives of the Community Plan:

Policy 2-1.1: New commercial uses shall be located in existing established commercial areas or shopping centers.

Policy 2-1.2: Protect commercially planned/zoned areas from encroachment by residential only development.

Policy 2-1.3: Ensure the viability of existing neighborhood stores and businesses which support the needs of local residential and are compatible with the neighborhood.

Policy 2-2.1: Encourage pedestrian-oriented design in designated areas and in new development.

Policy 2-2.5 Require that the first floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses.

Policy 2-3.1: Establish street identity and character through appropriate sign control, landscaping and streetscape improvements; and require that new development be compatible with the scale of adjacent neighborhoods.

Policy 2-3.2: Require that commercial projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with surrounding uses and development.

The project is consistent with and advances the above policies because it will be located on a site currently developed with office and retail uses, will not encroach into and is compatible with the surrounding residential neighborhood, will improve the overall vitality of the uses by

modernizing the exterior and interior spaces, will provide new ground floor dining uses that serve the community and on-site employees, and will improve the site's frontage along Olympic Boulevard, improving the pedestrian environment.

Further, the project's location near the Metro Expo Line Sepulveda Light Rail Station not only provides linkages to the rest of the Community Plan Area, but also to the greater Los Angeles metropolitan area. Therefore, the request achieves the objectives of the West Los Angeles Community Plan, which seeks to promote a strong and competitive commercial sector through the development of well-designed commercial areas that serve the surrounding community.

The project site is located within the West Los Angeles Transportation Improvement and Mitigation Specific Plan (West LA TIMP). The Specific Plan fees were adopted to provide a funding mechanism for transportation improvements needed to address transportation impacts generated by the projected new development within the Specific Plan area, and to require that new development projects mitigate project-related transportation impacts. New development projects are required to pay the traffic impact analysis fee to LADOT prior to the issuance of any building, grading or foundation permit. The project will comply with the intent and provisions of the Specific Plan.

- d. The project provides for an arrangement of uses, buildings, structures, open spaces and other improvements that are compatible with the scale and character of the adjacent properties and surrounding neighborhood.**

The findings for a Major Development Project Conditional Use Permit apply to a project creating 250 or more hotel guest rooms, and 100,000 square feet or more of floor area in other nonresidential uses in the C2 Zone. The project site and surrounding area, primarily the strip of commercial development along the north side of Olympic Boulevard between Barrington Avenue and Beloit Avenue are designated General Commercial with Height District 1. According to the General Plan Framework, General Commercial "applies to a diversity of retail sales and services, office, and auto-oriented uses comparable to those currently allowed in the "C2" zone (including residential). They are located outside of districts, centers, and mixed-use boulevards and occur at the intersections of major and secondary streets, or as low rise, low-density linear "strip" development along major and secondary streets. While the south side of Olympic Boulevard is designated as M2 with Height District 1, a majority of the existing development commercial mirrors the height, style, and massing of the existing development along the north side which includes an 11-story building located at 11444 W. Olympic Boulevard and 16 story building located at 11400 W. Olympic Boulevard, and a 12-story building at 11845 Olympic Boulevard.

The project will renovate the existing 10-story office towers and includes an additional 115,000 square feet of office and 5,000 square feet of ground floor dining. The height of the existing towers will remain. The new square footage will be constructed along Olympic Boulevard, reducing the setback. The new varying setback will be a minimum of 27 feet along the western frontage and a minimum of 9 feet five inches along the eastern frontage. An exterior courtyard stairway will link the two towers and provide landings at each level with access to office space and parking levels. Approximately half of the new office space will be created by squaring off the two existing towers and adding new connecting bridges on the fifth, seventh, and ninth levels. The remaining office space will be provided in a two-story podium that will connect the two towers on the second and third floors.

The two-story podium element will be compatible in scale and character with the adjacent properties. The two-story podium element will create a transition between the existing office towers and the single-story bank and church, located west and east of the project site, along Olympic Boulevard as well as the lower density residential neighborhood to the north of the

site (along Purdue Avenue and Corinth Avenue). An eight-story high-rise office building is located across Olympic Boulevard to the south and is in the M2-1 Zone. An additional eight-story building is located approximately half a block east of the project site and a twenty-story building is located approximately half a block west of the project site, both are in the M2-1 Zone and are located on the south side of Olympic Boulevard.

The existing on-site open space areas will be redesigned and new public and private open space areas will be developed as a result of the modernization project. The ground level space between the two existing towers will be redesigned with a new public plaza that will include seating landscaped areas, and various ground cover materials including concrete paves, artificial turf, and wood decking. The 49,122 square foot recreation deck will be redesigned with a new basketball court, outdoor private meeting areas, and artificial turf areas. A new roof terrace that will be open to employees will include landscaping and seating and will be located on the roof of the two-story podium element. The existing rear landscaped corners of the parking garage, along Mississippi Avenue, would be repurposed as a dog park and pocket park. The two areas would include lighting that would not disturb the surrounding residential uses but would ensures the spaces can be used at night.

The buildings' existing massing adjacent to the residential uses would remain unchanged. The proposed ground floor dining uses and new office space would change the buildings' footprint along Olympic Boulevard and would reduce the existing setbacks. The ground floor dining uses and plaza area would improve the overall vitality and character of Olympic Boulevard by creating a dedicated public space that could be used by surrounding residents, visitors and employees. Thus, the Project provides for an arrangement of uses, buildings, structures, open spaces and other improvements that are compatible with the scale and character of the adjacent properties and surrounding neighborhood.

e. The project complies with the height and area regulations of the zone in which it is located.

The project is consistent with the development standards of the existing underlying zoning of the project site, inclusive of the approval of the requested Height District. The project includes a Zone Change for the entire project site from [Q]C2-1 to (T)(Q)C2-2D. Approval of the Zone Change will replace the existing (Q) conditions, which includes square footage, height, and setback maximums, restricted vehicular ingress and egress points, and parking minimums. The proposed Zone Change maintains the existing regulations of the underlying C2 Zone and retains the existing zoning pattern on the project site. The proposed Zone and Height District Change is only necessary to reflect the proposed FAR to effectuate the project. The Height District applicable to the project site is Height District 1 which establishes a maximum FAR of 1.5:1. The requested Zone and Height District Change is necessary to indicate that Height District 2 is applicable to the project site. Height District 2 establishes a maximum FAR of 6:1. Pursuant to the proposed Development Limitation the project site would have an allowable FAR of 3:1. Without the Development Limitation, the project site will be zoned C2-2 which would allow a 6:1 FAR. The project represents a scale and intensity of development that was not only contemplated by the West Los Angeles Community Plan, but which is compatible with adjacent land uses, which consists of single and two-story residential uses and, low, mid and high-rise commercial structures. Thus, for the reasons stated above, the proposed Project would comply with the height and area regulations.

f. The project is consistent with the City Planning Commission's design guidelines for Major Development Projects.

The City Planning Commission has not adopted design guidelines for Major Development Projects; however, the Project is consistent with the following goal from the Urban Form and Neighborhood Design Chapter of the General Plan Framework:

Goal 5A: A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and Citywide scales.

Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.

Objective 5.5: Enhance the liveability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.

Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.

Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.

The project is located on Olympic Boulevard in the West Los Angeles community, an area that is dominated by a mix of low, mid, and high-rise strip development on major arterials. The project is an infill redevelopment project that will modernize the project site by renovating two existing 10-story office towers consisting of 342,078 square feet and the addition of a 120,000 square-foot expansion that includes connect the towers on levels five, seven, and nine; a two-story podium element that would connecting the towers on floors two through three; and the addition of ground floor dining uses. Additionally, updated outdoor and recreational amenities, including roof gardens and an outdoor recreation deck and pedestrian improvements along Olympic Boulevard will be provided.

The project will create a new development that will be attractive to future investment, and will result in the contribution to an existing commercial uses located in Sawtelle Japantown, one block east of the site. The project will create an improved and aesthetically appealing streetscape that will promote pedestrian activity by providing ground floor dining and a plaza area that encourages pedestrian activities and creates a human-scale frontage design. In addition, the project will promote walkability by encouraging the use of public transit, since the project site is near many transit options, particularly the Metro Expo Sepulveda Light Rail Station. The ground floor plaza area will be designed to promote gathering and socializing, which will serve as a focal point of activity for the surrounding community. These areas consist of seating, planting, and trees.

3. Site Plan Review Findings

- e. Pursuant to L.A.M.C. Section 16.05, and based on these Findings, the recommended action is deemed in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan.

The Project Site is located within the West Los Angeles Community Plan Area, which was adopted by the City Council on July 27, 1999 (pursuant to Council File 98-2024). The Plan Map designates the project site for General Commercial land use with corresponding zones of C1.5, C2, CR, C4, RAS3, RAS4, and P. The project site is zoned [Q]C2-1. The zone permits uses consistent with commercial, manufacturing, and multi-family residential uses. The Project is consistent with the land use and zoning, inclusive of the requested Height District Change, and in substantial conformance with the intent and provisions of the General Plan as reflected in the adopted Community Plan.

General Plan Text. The West Los Angeles Community Plan, a part of the Land Use Element of the City's General Plan, states the following goals, objectives, and policies that are relevant to the Project:

West Los Angeles Community Plan

Goal 2: A strong and competitive commercial sector which promotes economic vitality, serves the needs of the community through well designed safe and accessible areas while preserving historic and cultural character.

Objective 2-1: To conserve and strengthen viable commercial development and to provide additional opportunities for new commercial development and services within existing commercial areas.

Policy 2-1.1: New commercial uses shall be located in existing established commercial areas or shopping centers.

Policy 2-1.2: Protect commercially planned/zoned areas from encroachment by residential only development.

Policy 2-1.3: Ensure the viability of existing neighborhood stores and businesses which support the needs of local residential and are compatible with the neighborhood.

The Project is located on Olympic Boulevard in the West Los Angeles Community Plan Area, an area that is dominated by a mix of low, mid, and high-rise strip development on major arterials. Additionally, the site is located one block east of Sawtelle Japantown, an area comprised of dining and retail uses. The project will be developed on an infill site with existing office and retail uses. The project will redesign the existing office space and increase the buildings' total square footage, adding 115,000 gross square feet of office and 5,000 gross square feet of ground floor dining to the existing 330,758 square feet of office and 11,320 square feet of retail. The redesigned and new office space and ground floor dining uses would modernize the 1980s office complex, creating an office building that is reflective of existing market demands. The additional square footage would increase employment opportunities for the surrounding residents and the new ground floor dining uses would diversify on-site uses and provide new dining opportunities for employees and surrounding residents, thus promoting economic vitality and serving the needs of the community. Thus, the project will improve the site's economic vitality and serve the community by offering new job opportunities, ground floor dining uses, as well as a ground floor plaza.

Objective 2-2: To promote distinctive commercial districts and pedestrian-oriented areas.

Policy 2-2.1: Encourage pedestrian-oriented design in designated areas and in new development.

Policy 2-2.5 Require that the first floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses.

The two existing office towers are setback 30-feet from Olympic Boulevard. Two large raised turf areas create a buffer between the two office towers and the sidewalk. Existing tenants' signage as well as a main planter with the site's address and office complex name "Trident Center" are located in the turf area. The existing signage, height, slope, and surrounding concrete walls, contribute to the unusable landscaped areas that front Olympic Boulevard. The project would reconfigure the street frontage along Olympic Boulevard. The new varying setback will be a minimum of 27 feet along the western frontage and a minimum of 9 feet five inches along the eastern frontage. An exterior courtyard stairway will link the two towers and provide landings at each level with access to office space and parking levels. The reduced setback would include ground floor dining uses and a public plaza area with seating and landscaped improvements to establish a stronger street frontage identity and encourage pedestrian activity.

Objective 1-3: To enhance the appearance of commercial districts.

Policy 2-3.1: Establish street identity and character through appropriate sign control, landscaping and streetscape improvements; and require that new development be compatible with the scale of adjacent neighborhoods.

Policy 2-3.2: Require that commercial projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with surrounding uses and development.

The exterior of the towers will be predominantly painted metal panels, ceramic spandrels, and glass. The exterior envelope would incorporate floor-to-ceiling glazing, maximizing daylight and views while the use of highly effective transparent, non-reflective glazing will optimize daylight penetration. A combination of high-performance coatings and ceramic frit would minimize glare, solar heat gain, and energy consumption, achieving a high level of quality and character.

A two-story podium element will be constructed and contain approximately half of the new office square footage (57,500 square feet). The two-story podium element will create a transition between the existing office towers and the single-story bank and church, located west and east of the project site, along Olympic Boulevard, as well as improve the street identity and character by improving the site's frontage with ground floor dining uses, pedestrian scale development (e.g., the podium element building) and a public plaza area.

Single and two-story multi and single-family residential uses are located north of the project site and are in the R2-1 Zone. Single-family residential uses are also located to the west across Purdue Avenue and are located east across Corinth Avenue and are in the R2-1 Zone. The Japanese Institute of Sawtelle, a single-story structure is also located east, across Corinth Avenue. No new square footage is proposed along

Mississippi Avenue and the buildings' height will not change. The proposed density will be focused along Olympic Boulevard. Additionally, the northern corners along Mississippi Avenue will be improved with a public pocket park and dog park, both of which will create a buffer between the parking structure and adjacent residential uses.

Therefore, the project is consistent with the General Plan and the West Los Angeles Community Plan.

Framework Element

The Framework Element for the General Plan (Framework Element) was adopted by the City of Los Angeles in December 1996 and re-adopted in August 2001. The Framework Element provides guidance regarding policy issues for the entire City of Los Angeles, including the project site. The Framework Element also 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. Specifically, the proposed development would be consistent with the following goals, objectives, and policies of the Framework Element:

Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more liveable city.

Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.

Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.

Policy 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.

The project involves the renovation of two existing 10-story office towers and introduce additional office and new ground floor dining uses to the site. The project will provide 149 bicycle parking spaces and will improve pedestrian access to the site by improving the site's Olympic Boulevard frontage with a two-story podium element, ground floor dining uses, and a public plaza area with landscaping and seating. The high density office project is located near transit and represents a balanced distribution of land uses, revitalization, and will contribute to the reduction of vehicle miles traveled.

The on-site improvements will not change the existing scale and character of the two towers. No new square footage is proposed along Mississippi Avenue and the buildings' height will not change. The two-story podium element will create a transition between the existing office towers and the single-story bank and church, located west and east of the project site, along Olympic Boulevard as well as the lower density residential neighborhoods to the north of the site (along Purdue Avenue and Corinth Avenue).

Goal 3H: Lower-intensity highway-oriented and local commercial needs outside centers and districts.

Objective 3.12: Generally, maintain the uses, density, and character of existing low-intensity commercial districts whose functions serve surrounding neighborhoods and/or precluded from intensification due to their physical characteristics.

Policy 3.12.1: Accommodate the development of uses in areas designated as "General Commercial" in the community plans in accordance with Tables 3-1 and 3-7. The range and densities/intensities of uses permitted in any area shall be identified in the community plans.

The General Plan Framework identifies General Commercial as offering a "diversity of retail sales and services, office, and auto-oriented uses comparable to those currently allowed in the "C2" zone (including residential). They are located outside of districts, centers, and mixed-use boulevards and occur at the intersections of major and secondary streets, or as low rise, low-density linear "strip" development along major and secondary streets." The project is consistent with this designation as it will develop the site with additional office use and new ground floor restaurant dining use.

The project will modernize the existing on-site office and retail uses as well as construct 115,000 square feet of new office and 5,000 square feet of new ground floor dining. While the project is requesting that Height District 2 be applicable to the site, the new square footage will be located along the Olympic Boulevard. Additionally, pursuant to the proposed Development Limitation the project site would have an allowable FAR of 3:1, instead of the 6:1 FAR permitted under Height District 2. The project represents a scale and intensity of development that was not only contemplated by the West Los Angeles Community Plan, but which is compatible with adjacent land uses, which consists of single and two-story residential uses and, low, mid and high-rise commercial structures.

Based on the above analysis, the project is in substantial conformance with the purposes, intent and provisions of the Framework Element.

- f. That the project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements, that is or will be compatible with existing and future development on adjacent properties and neighboring properties.**

The area surrounding the project site is highly urbanized. Adjacent land uses are mid- to high-rise, high-density commercial, retail, and office uses along Olympic Boulevard, transitioning to lower density residential neighborhoods to the north and south of Olympic Boulevard. An eight-story high-rise office building is located across Olympic Boulevard to the south and is in the M2-1 Zone. An additional eight-story building is located approximately half a block east of the project site and a twenty-story building is located approximately half a block west of the project site, both are in the M2-1 Zone and are located on the south side of Olympic Boulevard. Low- to mid-rise residential uses are located to the east across Corinth Avenue, west across Purdue Avenue, and north across Mississippi Avenue and are in the R2-1 Zone.

The following project elements are incorporated into the project design in a manner that is compatible with both existing and future development in the surrounding area:

- i. Building Design. The project is designed in a contemporary architectural style. The existing towers' facades will be predominately painted metal panels, ceramic spandrels, and glass. The exterior envelop will incorporate floor-to-ceiling glazing, maximizing daylight and views while the use of highly effective transparent, non-reflective glazing will optimize daylight penetration. A combination of high-performance coatings and ceramic frit will minimize glare, solar heat gain, and energy consumption. Non-reflective glazing finishes and high-performance coatings will be applied to the glass surface to minimize glare. The existing buildings will be retrofitted to improve the buildings' performance and meet the City's Resilience by Design Initiative. Approximately half of the additional office space will be created by squaring off the two existing towers and adding new connecting bridges on the fifth, seventh, and ninth levels. The other half of the additional office space will be created by adding a two-story podium that will link the two towers on the second and third floors. No new square footage is proposed along Mississippi Avenue.
- ii. Building Orientation/Frontage. The two existing office towers are setback 30-feet from Olympic Boulevard. The project will expand the two towers' footprints towards Olympic Boulevard, removing the existing two large raised turf areas, and creating a new setback. The new varying setback will be a minimum of 27 feet along the western frontage and a minimum of 9 feet five inches along the eastern frontage. An exterior courtyard stairway will link the two towers and provide landings at each level with access to office space and parking levels. The primary entrance to the building faces Olympic Boulevard and is indicated with an exterior stairway located between the two existing towers with landings at each level. The ground floor of the project is differentiated from the upper floors with a floor to ceiling height of approximately 15 feet and with the use of continuous storefront glazing.

Pedestrian and bicycle access to the project site will be provided via a ground floor plaza area and ground floor of the parking structure. Additionally, bicyclists will be able to access the long and short-term bicycle parking via the southern driveway along Purdue Avenue.

The surrounding sidewalks were improved with Lemon Gum, African Fern Pine, Australian Willow, and Brisbane Box street trees. The project will not include improvements to the sidewalks around the perimeter of the project site, including maintenance of the existing street trees.

- iii. Height/Bulk. The project involves the construction of a 34-story residential building with a total of 376 multi-family dwelling units. The tower is approximately 338 feet to top of parapet and approximately 380 feet to the top of the penthouse. The tower floor plan is 178 feet 3 inches in length by 63 feet in depth. The western portion of the project includes an enclosed podium parking level, including 28 parking spaces and short-term bicycle parking spaces, with an outdoor pool deck above.

The two-story podium element will create a transition between the existing office towers and the single-story bank and church, located west and east of the project site, along Olympic Boulevard as well as the lower density residential neighborhoods to the north of the site (along Purdue Avenue and Corinth Avenue). An eight-story high-rise office building is located across Olympic Boulevard to the south and is in the M2-1 Zone. An additional eight-story building is located approximately half a block east of the project site and a twenty-story building is located approximately half a block west of the project site, both are in the M2-1 Zone and are located on the south side of Olympic Boulevard.

iv. Setbacks. The existing towers are setback 30 feet from Olympic Boulevard. The new varying setback will be a minimum of 27 feet along the western frontage and a minimum of 9 feet five inches along the eastern frontage. An exterior courtyard stairway will link the two towers and provide landings at each level with access to office space and parking levels.

v. Open Space and On-Site Landscaping. In accordance with LAMC Section 12.21 G, multi-family residential projects with six or more units on a lot is required to provide usable open space, however the LAMC does not require commercial projects to provide open space.

In total the project is providing 108,619 square feet of open space, including 11,210 square feet of publicly accessible landscaped areas that will be located on the ground floor. Employee amenities will include a 43,820 square-foot private recreation deck (a top the parking structure), a 12,160 private roof terrace (located on the roof of the proposed podium element), and 2,035 square feet of internal open space on floors sixth, eight, and tenth floors. Public open space, open to visitors and employees, will include an 1,853 square-foot dog park at the northwest corner of Mississippi Avenue and Purdue Avenue and a 1,155 square foot pocket park located at the northeast corner of Mississippi Avenue and Corinth Avenue, and a ground floor plaza area with two deck areas totaling 6,414 square feet.

Shrubs, grasses, artificial turf, and trees will be planted in public open space areas. The plaza, deck, and pocket park will feature hardscape paving, movable furniture, planters, seatwalls, and outdoor tables and seating. The project will also provide 26 new trees, including roof deck trees, trees along the plaza. The project will not replace the existing streets trees. Given the ample open space provided by the project, including publicly accessible open space, the project will be compatible with adjacent and surrounding properties.

vi. Off-Street Parking and Driveways. No changes will be made to the existing parking structure and vehicular driveways. The project includes 1383 vehicle parking spaces. Vehicle parking is provided within an existing five level parking structure, with two levels of subterranean parking and three podium parking levels. Vehicular access to the subterranean parking levels is via three driveways along Purdue Avenue and two driveways along Corinth Avenue.

vii. Building Signage and Lighting. All signage will consist of a contemporary architectural style of the building and will comply with all LAMC requirements.

The project includes low-level exterior lights adjacent to buildings and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements will be incorporated throughout the project site. The open space area includes low-level fixture lighting for security and wayfinding purposes as well as low-level accent lighting for landscape elements. Project lighting will provide on-site lighting while minimizing light trespass from the project site, reducing sky-glow, and improving nighttime visibility through glare reduction. All on-site exterior lighting, including lighting fixtures along Mississippi Avenue (adjacent to the residences to the north) will be shielded or directed toward areas to be illuminated to limit spill-over onto nearby residential areas, thereby being compatible with the surrounding properties

viii. Loading Areas. A loading deck and building service entry is located along Corinth Avenue so as to not interfere with pedestrian and vehicular access to the project.

- ix. Trash Collection. Trash containers will be located within an enclosed trash room on the ground floor and will not be visible to the public.

The project site consists of two existing ten-story office towers, 115,000 square feet of office and 5,000 square feet of ground floor dining, off-street parking facilities, a loading area, lighting, landscaping, trash collection, and other such pertinent improvements. The project increases the density of the existing on-site commercial uses and contributes to the nature of the surrounding the site by renovating the existing office towers, developing the site with new uses, and providing publicly accessible open space to serve the community. The project enhances the existing mix of uses in the neighborhood, some of which are higher density office and commercial, by providing new jobs and neighborhood serving ground floor dining uses, to meet the needs of the growing residential population in the area. As such, the project is compatible with existing development on adjacent and neighboring properties.

- g. That any residential project provide recreational and service amenities to improve habitability for its residents and minimize impacts on neighboring properties.**

No residential uses are proposed as part of the project. The project provides 108,619 square feet of private and common open space. All landscaped areas are designed with a variety of drought-tolerant, low-maintenance plant species. Private space for employees includes terraces located on the sixth, eighth floors, and tenth a roof terrace with landscaping and seating, an existing 49,122 square-foot recreation deck, and a terrace located on the roof of the podium structure. A new ground floor plaza, dog park and pocket park will be open to visitors and surrounding residences.

The open space areas will include tables and chairs, benches, and built in benches. Landscaping includes planters with various shrubs and flowers, grass, and various tree types including Asparagus Fern, Agave, Creeping Fig, Dwarf Olive, and Fescues. Tree types will include: Deodar Cedar, Southern Live Oak, and Fern Pine.

The residential open space amenities include private balconies, a pool deck and spa, fitness room and club room. The residential amenity deck includes a plank paving, a pool, spa and seating. Landscaping on the pool deck includes planters with Dragons Blood and Triangle Palm trees.

In addition, the Initial Study prepared for the project found that project impacts to park facilities will be less than significant and thus no further evaluation was required in the EIR.

C. Findings of Fact (CEQA)

I. INTRODUCTION

The Environmental Impact Report (EIR), consisting of the Draft EIR and the Final EIR, is intended to serve as an informational document for public agency decision-makers and the general public regarding the objectives and components of the Trident Modernization Project located at 11355 and 11377 West Olympic Boulevard. The project involves the renovation of two existing 10-story office towers with 342,078 square feet and the addition of a 120,000 square-foot horizontal expansion that includes connecting the towers on levels five, seven, and nine; a two-story podium element that would connect the towers on floors two through three and; the addition of ground floor dining uses. Additionally, updated outdoor and recreational amenities, including roof gardens and an outdoor recreation deck; and pedestrian improvements along Olympic Boulevard would be provided. The existing two-10 story office towers are connected by a parking structure that includes three levels of above-grade and two levels of subterranean parking. Development of the project would increase the buildings' total square

footage, adding 115,000 gross square feet of office and 5,000 gross square feet of restaurant use to the existing 330,758 square feet of office and 11,320 square feet of retail. The total square footage would be 462,078 square feet. The height of the existing office towers will remain. Upon completion, the project would result in a total maximum floor area ratio (FAR) of 3:1.

II. ENVIRONMENTAL DOCUMENTATION BACKGROUND

The project was reviewed by the Los Angeles Department of City Planning, Major Projects Section (serving as Lead Agency) in accordance with the requirements of the CEQA. The City prepared an Initial Study in accordance with Section 15063(a) of the State CEQA Guidelines. Pursuant to the provisions of Section 15082 of the State CEQA Guidelines, the City then circulated a Notice of Preparation (NOP) to State, regional and local agencies, and members of the public for a 32-day period beginning on January 20, 2017 and commencing on February 21, 2017. The purpose of the NOP was to formally inform the public that the City was preparing a Draft EIR for the project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR.

Written comment letters responding to the NOP were submitted to the City by public agencies and interested organizations. Comment letters were received from various public agencies. Also, written comments were provided by interested organizations and/or individuals via mail, e-mail. The NOP and Initial Study Comments are included in Appendix A, of the Draft EIR.

The Draft EIR evaluated in detail the potential effects of the project. It also analyzed the effects of a reasonable range of four alternatives to the project, including a "No Project" alternative. The Draft EIR for the project (State Clearinghouse No. 2017011045), incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and City CEQA Guidelines (Pub. Resources Code § 21000, et seq.; 14 Cal. Code Regs. §15000, et seq.; City of Los Angeles Environmental Quality Act Guidelines). The Draft EIR was circulated for a 46 - day public comment period beginning on December 21, 2017, and ending on through February 5, 2018. Copies of the written comments received are provided in the Final EIR. Pursuant to Section 15088 of the CEQA Guidelines, the City, as Lead Agency, reviewed all comments received during the review period for the Draft EIR and responded to each comment in Section II of the Final EIR.

The City published a Final EIR for the project on June 15, 2018, which is hereby incorporated by reference in full. The Final EIR is intended to serve as an informational document for public agency decision-makers and the general public regarding objectives and components of the project. The Final EIR addresses the environmental effects associated with implementation of the project, identifies feasible mitigation measures and alternatives that may be adopted to reduce or eliminate these impacts, and includes written responses to all comments received on the Draft EIR during the public review period. Responses were sent to all public agencies that made comments on the Draft EIR at least 10 days prior to certification of the Final EIR pursuant to CEQA Guidelines Section 15088(b). The Final EIR was also made available for review on the City's website. Digital copies of the Final EIR were also made available at three libraries and a hard copy was made available at the City Department of Planning. Notices regarding availability of the Final EIR were sent to those within a 500-foot radius of the project site, as well as individuals who commented on the Draft EIR, attended the NOP scoping meeting, provided comments during the NOP comment period, or requested notice.

A duly noticed public hearing for the project was held by the Deputy Advisory Agency and the Hearing Officer on behalf of the City Planning Commission on June 27, 2018.

The documents and other materials that constitute the record of proceedings on which the City's CEQA findings are based are located at the Department of City Planning, Major Projects

Section, 221 N. Figueroa St., Suite 1350, Los Angeles, California 90012. This information is provided in compliance with CEQA Section 21081.6(a)(2).

Pursuant to CEQA Guidelines Sections 15162 and 15164, in consideration of the whole of the administrative record, the project was assessed in the previously **Certified** Environmental Impact Report No. ENV-2016-1463-EIR, certified on June 27, 2018, and no subsequent EIR, negative declaration, or addendum is required for approval of the project.