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May 28, 2019

Los Angeles City Council
c/o Office of the City Clerk
City Hall, Room 395
Los Angeles, California 90012

Attention: PLUM Committee

Dear Honorable Members:

RECOMMENDATION FOR A TECHNICAL CLARIFICATION TO THE SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT FOR CASE NO. VTT-74760-1A; 1000 SOUTH HILL STREET (1000-1034 SOUTH HILL STREET; 220-226 WEST OLYMPIC BOULEVARD); CF 18-1206 (ITEM #5)

In a letter dated May 23, 2019, the Department of City Planning provided recommendations to the City Council relative to an appeal of the City Planning Commission's determination to sustain the Advisory Agency's approval of Vesting Tentative Tract Map No. 74760. Planning Staff recommended that City Council find that the Project qualifies as a Transit Priority Project and meets the Sustainable Communities Environmental Assessment (SCEA) eligibility criteria; deny the appeal; and adopt the SCEA, modification to the Mitigation Measure T-3, and the modified conditions of approval and findings of fact.

Planning Staff further recommends that Section IV-A *Incorporation of Applicable Mitigation Measures from Prior EIRs*, Page IV-1, of the SCEA be clarified to include a cross-reference to the analysis set forth in Section VI of the SCEA as the basis for City's determinations in Table IV-1. Planning Staff recommends that the City Council modify the third paragraph on Page IV-1 as follows:

In accordance with the requirements set forth in PRC Section 21151.2, the Lead Agency has reviewed all of the suggested mitigation measures in the SCAG MMRP and determined their applicability to the Proposed Project. For each such mitigation measure, the City considered whether to use the SCAG MMRP mitigation measure or an equally effective City mitigation measure or federal, state, regional, or City regulation. The City's applicability determination is provided in Table IV-1 below. For each impact category where the City has determined that the use of a City mitigation measure or a federal, state, regional, or City regulation is equal to or more effective than the SCAG MMRP mitigation measure, the decision is based on the analysis in Section VI *Sustainable Communities Environmental Analysis*, including all technical reports in the Appendix.

Date: 5-28-19

Submitted in PLUM Committee

Council File No: 18-1206

Item No.: 5

Deputy: Report from DCP

Planning Staff also recommends that Table IV-1 of the SCEA, Page IV-21, be clarified to include the following paragraph at the conclusion of the *Cultural Resources – Substantial Adverse Change in Significance of a Historical Resource, Substantial Adverse Change in the Significance of an Archaeological Resource – Applicability to the Project* section:

Furthermore, there are no historical resources on the Project site and no historical resources would be demolished, destroyed, altered, or relocated as a result of the Project. (Appendix B Historic Resources Assessment, Page 18.) Indirect impacts were also analyzed in light of the existence of two sites that are identified as "eligible for listing in the National Register in the Central Business District Historic Resources Survey" in 1983. The Project would not result in a substantial adverse change to the immediate surroundings of this historical resource to the degree its eligibility, as a resource would be materially impaired. It would continue to be eligible for listing as historical resource defined by CEQA. No mitigation is required or applicable.

Sincerely,

VINCENT P. BERTONI, AICP
Director of Planning



Jane Choi, AICP
Senior City Planner
JC:MS:MS