

**DEPARTMENT OF  
CITY PLANNING**

COMMISSION OFFICE  
(213) 978-1300

CITY PLANNING COMMISSION

SAMANTHA MILLMAN  
PRESIDENT

VAHID KHORSAND  
VICE-PRESIDENT

DAVID H. J. AMBROZ  
CAROLINE CHOE  
HELEN LEUNG  
KAREN MACK  
MARC MITCHELL  
VERONICA PADILLA-CAMPOS  
DANA M. PERLMAN

**CITY OF LOS ANGELES**  
CALIFORNIA



ERIC GARCETTI  
MAYOR

**EXECUTIVE OFFICES**  
200 N. SPRING STREET, ROOM 525  
LOS ANGELES, CA 90012-4801  
(213) 978-1271

VINCENT P. BERTONI, AICP  
DIRECTOR

KEVIN J. KELLER, AICP  
EXECUTIVE OFFICER

SHANA M.M. BONSTIN  
DEPUTY DIRECTOR

TRICIA KEANE  
DEPUTY DIRECTOR

ARTHI L. VARMA, AICP  
DEPUTY DIRECTOR

LISA M. WEBBER, AICP  
DEPUTY DIRECTOR

May 23, 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 CONSIDERATION OF ADOPTION OF A SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT AND MODIFIED CONDITIONS OF APPROVAL AND FINDINGS FOR CASE NO. VTT-74760-1A; 1000 SOUTH HILL STREET (1000-1034 SOUTH HILL STREET; 220-226 WEST OLYMPIC BOULEVARD); CF 18-1206**

At its meeting on November 8, 2018, the Los Angeles City Planning Commission (CPC) considered an appeal of the Advisory Agency's determination to approve Vesting Tentative Tract Map No. 74760 for the merger and resubdivision of seven lots into one lot for residential and commercial condominium purposes for a maximum of 700 residential units and 15,000 square feet of commercial floor area. After consideration of the whole of the administrative record and all comments received, the CPC found that the Mitigated Negative Declaration (MND), Case No. ENV-2016-4711-MND, reflected the independent judgment and analysis of the City; found that there is no substantial evidence that the project would have a significant effect on the environment; found that the mitigation measures were made enforceable conditions on the project; adopted the MND and the Mitigation Monitoring Program (MMP) prepared for the project; and denied the appeal and sustained the decision of the Advisory Agency to approve the Vesting Tentative Tract Map. The written determination of the CPC was issued on November 27, 2018 and was subsequently appealed by the following individuals or organizations:

1. Charles Carnow and Antonio Mendoza, UNITE HERE! Local 11
2. Laborer's International Union of America, Local 300  
Representative: Douglas Chermak, Lozeau Drury, LLP

Both Appellants cite that the reason for the appeal is that the MND prepared for the Project fails to comply with the California Environmental Quality Act (CEQA) and that the analysis insufficiently analyzed impacts related to aesthetics, greenhouse gases, historic resources, and transportation and traffic. The appellants assert that the MND is improper and that an Environmental Impact Report (EIR) should be required.

The appeal points raised by the appellant are similar in nature to the appeal points raised before the CPC, as addressed by Planning Staff in the Staff Recommendation Report for Case No. VTT-74760-1A, and as discussed at the public hearing before the CPC on November 8, 2018. The appeals do not raise or provide new substantial evidence which would support their claims that an EIR would be required. As determined by the Advisory Agency and the CPC on appeal, the MND adequately analyzed the potential impacts of the Project and incorporated all of the identified mitigation measures as enforceable conditions of the Project.

In addition to not finding any substantial evidence, submitted as part of the appeal, to support a fair argument that an EIR would be required under CEQA, the City, as the lead agency, found that the Project is also a Transit Priority Project (TPP), as defined in Public Resource Code Section 21155(a) and (b), and that a Sustainable Communities Environmental Assessment (SCEA) could be prepared and considered, in lieu of the MND that was prepared and recommended for adoption by the Advisory Agency and CPC. By proceeding with a SCEA, the City is not conceding that the MND is inadequate. On the contrary, the SCEA is substantially the same as the underlying MND that was prepared, but offers the benefit of streamlined review and the substantial evidence standard of review.

The SCEA is one form of CEQA review, that was adopted as part of the enactment of Senate Bill 375 (SB 375) in 2008, which provided for CEQA Streamlining for TPPs that are consistent with the sustainable communities strategies of the applicable Metropolitan Planning Organization (MPO). Here, the Project was determined to be consistent with the Southern California Association of Governments (SCAG), the applicable MPO, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS), as well as meeting all the eligibility criteria for a TPP. As such, the City elected to prepare a SCEA, Case No. ENV-2019-1792-SCEA, as the environmental clearance for the Project in lieu of proceeding with the MND that was initially prepared for the Project.

As discussed in Section II, A.1 (Project Description, Introduction) of the SCEA, the SCEA contains the same substantive environmental analysis as the MND, Case No. ENV-2016-4711-MND, and also includes additional discussion demonstrating that the Project is a TPP that qualifies for CEQA streamlining under SB 375. The SCEA was published on April 4, 2019, with the public comment period ending on May 6, 2019. The City received three comment letters, as well as a response to comments from the applicant. The City has responded to the comments, which can be found in the recommended Modified Conditions of Approval and Findings for Case No. VTT-74760-1A in the attached Exhibit A.

## **RECOMMENDATION**

Planning Staff recommends that the City Council take the following actions:

1. FIND, based on the entire administrative record and all comments received, that:
  - a. The project qualifies as a transit priority project pursuant to Public Resource Code (PRC) Section 21155(b).

- b. The proposed project is consistent with the general use designations, density, building intensity, and applicable policies specified for the project area in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by the Southern California Association of Governments (SCAG).
  - c. The proposed project contains more than 50 percent residential; provides a minimum net density greater than 20 units an acre; and, is within one half mile of a major transit stop or high-quality transit corridor included in the RTP/SCS.
  - d. The proposed project is a residential or mixed-use project as defined by PRC Section 21159.28(d).
  - e. The proposed project incorporates all feasible mitigation measures, performance standards, or criteria set forth in the prior environmental reports, including SCAG's 2016-2040 RTP/SCS Program Environmental Impact Report.
  - f. All potentially significant or significant effects required to be identified and analyzed pursuant to the California Environmental Quality Act (CEQA) in an initial study have been identified and analyzed in an initial study, and that said initial study has been prepared and circulated in compliance with PRA Section 21155.2(b).
  - g. With respect to all potentially significant or significant effects on the environment required to be identified in the initial study, changes or alterations have been required in or incorporated into the project that avoids or mitigates the significant effects to a level of insignificance, and those changes or alterations that are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
  - h. Mitigation measures will be made enforceable conditions on the project.
2. FIND that the proposed project complies with the requirements of CEQA for using a SCEA as authorized pursuant to PRC Section 21155.2(b).
  3. MODIFY Mitigation Measure MM-T-3 *Construction Management Plan* of the SCEA to require coordination with transit line operators with bus stops adjacent to the project site and FIND that the modification to the mitigation measure does not require the recirculation of the SCEA pursuant to PRC Section 15073.5 and 15074.1 because the modification merely clarifies, amplifies, or makes insignificant modifications to the SCEA and that the new measure is equivalent and more effective in mitigating or avoiding potential significant effects and that it in itself will not cause any potentially significant effect on the environment.
  4. ADOPT the SCEA and the MMP prepared for the SCEA.
  5. DENY the appeal and SUSTAIN the decision of the City Planning Commission to approve Case No. VTT-74760-1A and ADOPT the conditions of approval and findings of the City Planning Commission, with the following modifications, as the conditions of approval and findings of the City Council:

- a. Modify Condition Nos. 14 and 15 to reflect the mitigation measures identified in the SCEA and as modified by the City Council, as shown in the attached Exhibit A;
- b. Modify Findings of Fact (CEQA) to reflect the adoption of the SCEA and MMP prepared for the SCEA as the environmental clearance for the Project, as shown in the attached Exhibit A.

Sincerely,

VINCENT P. BERTONI, AICP  
Director of Planning



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

Attachments:

- Exhibit A: Modified Conditions of Approval and Findings for Case No. VTT-74760-1A
- Exhibit B: Public Comments Received During the Publication Period for Case No. ENV-2019-1792-SCEA

**Exhibit A:**  
**Modified Conditions of Approval and Findings**  
**for Case No. VTT-74760-1A**

## CONDITIONS OF APPROVAL

As modified by the Planning and Land Use Management Committee on May 28, 2019

### BUREAU OF ENGINEERING - SPECIFIC CONDITIONS

1. That a 21-foot wide strip of land be dedicated along Olympic Boulevard adjoining the subdivision to complete a 51-foot wide half public street right-of-way in accordance with Modified Avenue I of LA Mobility Standards and per Downtown Street Standards. A 15-foot by 15-foot property line cut corner or a 20-foot radius property line return also shall be dedicated at the intersection with Hill Street adjoining the tract. Additional an 8-foot wide average public sidewalk easement shall be provided adjoining the above dedication.
2. That a 2-foot wide strip of land be dedicated along the alley adjoining the tract to complete a 10-foot wide half alley dedication.

### DEPARTMENT OF BUILDING AND SAFETY, GRADING DIVISION

3. That prior to issuance of a grading or building permit, or prior to recordation of the final map, the subdivider shall comply with any requirements with the Department of Building and Safety, Grading Division for the recordation of the final map and issuance of any permit.

### DEPARTMENT OF BUILDING AND SAFETY, ZONING DIVISION

4. Prior to recordation of the final map, the Department of Building and Safety, Zoning Division, shall issue a clearance letter stating that no Building or Zoning Code violations existing relating to the subdivision on the subject site once the following items have been satisfied:
  - a. Provide a copy of CPC cases CPC-2016-4710-TDR-MCUP-SPR. Show compliance with all the conditions/requirements of the CPC cases as applicable.
  - b. Provide a copy of affidavits AFF-6849 and AFF-4236. Show compliance with all the conditions/requirements of the above affidavits as applicable. Termination of above affidavit may be required after the Map has been recorded. Obtain approval from the Department, on the termination form, prior to recording.
  - c. Show all street dedication(s) as required by Bureau of Engineering and provide net lot area after all dedication. "Area" requirements shall be re-checked as per net lot area after street dedication. Front and side yard requirements shall be required to comply with current code as measured from new property lines after dedication(s).

#### Notes:

The proposed project site is within the Greater Downtown Housing Incentive Area.

The submitted Map may not comply with the number of guest parking spaces required by the Advisory Agency.

The proposed building plans have not been checked for and shall comply with Building and Zoning Code requirements. With the exception of revised health or safety standards, the subdivider shall have a vested right to proceed with the

proposed development in substantial compliance with the ordinances, policies, and standards in effect at the time the subdivision application was deemed complete. Plan check will be required before any construction, occupancy or change of use.

If the proposed development does not comply with the current Zoning Code, all zoning violations shall be indicated on the Map.

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

#### DEPARTMENT OF TRANSPORTATION

5. That the project be subject to any recommendations from the Department of Transportation.

#### FIRE DEPARTMENT

6. That prior to the recordation of the final map, a suitable arrangement shall be made satisfactory to the Fire Department, binding the subdivider and all successors to the following:
  - a. Submittal of plot plans for Fire Department review and approval prior to recordation of Tract Map Action.
  - b. Access for Fire Department apparatus and personnel to and into all structures shall be required.
  - c. One or more Knox Boxes will be required to be installed for LAFD access to project.
  - d. 505.1 Address identification. New and existing buildings shall have approved building identification placed in a position that is plainly legible and visible from the street or road fronting the property.
  - e. The entrance to a Residence lobby must be within 50 feet of the desired street address curb face.
  - f. Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units.
  - g. The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
  - h. No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

- i. The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.
- j. 2014 CITY OF LOS ANGELES FIRE CODE, SECTION 503.1.4 (EXCEPTION)
  - i. When this exception is applied to a fully fire sprinklered residential building equipped with a wet standpipe outlet inside an exit stairway with at least a 2 hour rating the distance from the wet standpipe outlet in the stairway to the entry door of any dwelling unit or guest room shall not exceed 150 feet of horizontal travel AND the distance from the edge of the roadway of an improved street or approved fire lane to the door into the same exit stairway directly from outside the building shall not exceed 150 feet of horizontal travel.
  - ii. It is the intent of this policy that in no case will the maximum travel distance exceed 150 feet inside the structure and 150 feet outside the structure. The term "horizontal travel" refers to the actual path of travel to be taken by a person responding to an emergency in the building.
  - iii. This policy does not apply to single-family dwellings or to non-residential buildings.
- k. Building designs for multi-storied residential buildings shall incorporate at least one access stairwell off the main lobby of the building; But, in no case greater than 150ft horizontal travel distance from the edge of the public street, private street or Fire Lane. This stairwell shall extend onto the roof.
- l. Entrance to the main lobby shall be located off the address side of the building.
- m. Any required Fire Annunciator panel or Fire Control Room shall be located within 50ft visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department.
- n. Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.
- o. The Fire Department may require additional roof access via parapet access roof ladders where buildings exceed 28 feet in height, and when overhead wires or other obstructions block aerial ladder access.
- p. 5101.1 Emergency responder radio coverage in new buildings. All new buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety communication systems of the jurisdiction at the exterior of the building. This section shall not require improvement of the existing public safety communication systems.
- q. Recently, the Los Angeles Fire Department (LAFD) modified Fire Prevention Bureau (FPB) Requirement 10. Helicopter landing facilities are still required on all High-Rise buildings in the City. However, FPB's Requirement 10 has been revised to provide two new alternatives to a full FAA-approved helicopter



landing facilities.

- r. Each standpipe in a new high-rise building shall be provided with two remotely located FDC's for each zone in compliance with NFPA 14-2013, Section 7.12.2.

The applicant is further advised that all subsequent contact regarding these conditions must be with the Hydrant and Access Unit. This would include clarification, verification of condition compliance and plans or building permit applications, etc., and shall be accomplished BY APPOINTMENT ONLY, in order to assure that you receive service with a minimum amount of waiting please call (213) 482-6509. You should advise any consultant representing you of this requirement as well.

#### **DEPARTMENT OF WATER AND POWER**

7. Satisfactory arrangements shall be made with the Los Angeles Department of Water and Power (LADWP) for compliance with LADWP's Water System Rules and requirements. Upon compliance with the following conditions and requirements, LADWP's Water Services Organization will forward the necessary clearances to the Bureau of Engineering:
  - a. Prior to receiving water service the developer must arrange for the Department to install the following: fire hydrants.
  - b. Pressure regulators will be required in accordance with the Los Angeles City Plumbing Code for the following lot(s) where pressures exceed 80 psi at the building pad elevation: High 90 PSI, Low 73 PSI
  - c. Existing water mains are located in or adjacent to this tract as follows: 12" water main in Hill Street, 24" water main in Olympic Boulevard.
  - d. New fire hydrants and/or top upgrades to existing fire hydrants are required in accordance with the Los Angeles Fire Code. Install one (1) 2-1/2" x 4" D.F.H. on the east side of Hill Street, approximately 300' SS Olympic Blvd.

#### **BUREAU OF STREET LIGHTING – SPECIFIC CONDITIONS**

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

#### **BUREAU OF SANITATION**

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

#### **DEPARTMENT OF RECREATION AND PARKS**

10. That the Park Fee paid to the Department of Recreation and Parks be calculated as a Subdivision (Quimby in-lieu) fee.

## DEPARTMENT OF CITY PLANNING – SITE SPECIFIC CONDITIONS

11. Prior to the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:
  - a. Limit the proposed development to a maximum of 700 residential units and 15,000 square feet of commercial floor area.
  - b. Pursuant to LAMC Section 12.21 A.4(p)(1), provide a minimum of one off-street parking space per dwelling unit having three habitable rooms or fewer, and provide a minimum of 1.25 parking spaces per dwelling unit having more than three habitable rooms. Notwithstanding the above, the applicant may elect to reduce parking using the bicycle replacement provisions of LAMC Section 12.21 A.4.
  - c. Pursuant to LAMC Section 12.21 A.4(i)(2)(3), provide a minimum of one off-street parking space per 1,000 square feet of commercial floor area.
  - d. That a solar access report shall be submitted to the satisfaction of the Advisory Agency prior to obtaining a grading permit.
  - e. That the subdivider consider the use of natural gas and/or solar energy and consult with the Department of Water and Power and Southern California Gas Company regarding feasible energy conservation measures.
  - f. Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material.
  - g. INDEMNIFICATION AND REIMBURSEMENT OF LITIGATION COSTS.

Applicant shall do all of the following:

- (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.
- (ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.
- (iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than \$50,000. The City's failure to notice or collect the deposit does not relieve the Applicant

from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

- (iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
- (v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

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

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

For purposes of this condition, the following definitions apply:

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

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

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

12. That prior to the issuance of the building permit or the recordation of the final map, a copy of Case No. CPC-2016-4710-TDR-MCUP-SPR shall be submitted to the satisfaction of the Advisory Agency. In the event that Case No. CPC-2016-4710-TDR-MCUP-SPR is not approved, the subdivider shall submit a tract modification.

#### DEPARTMENT OF CITY PLANNING - ENVIRONMENTAL MITIGATION MEASURES

13. That prior to recordation of the final map the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770 and Exhibit CP-6770. in a manner satisfactory to the Planning Department requiring the subdivider to identify (a) mitigation monitor(s) who shall provide periodic status reports on the implementation of mitigation items required by Mitigation **Condition No. 14 and 15** of the

Tract's approval satisfactory to the Advisory Agency. The mitigation monitor(s) shall be identified as to their areas of responsibility, and phase of intervention (pre-construction, construction, postconstruction/maintenance) to ensure continued implementation of the above mentioned mitigation items.

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

MM-1. Increased Noise Levels (Parking Structure Ramps)

Concrete, not metal, shall be used for construction of parking ramps. The interior ramps shall be textured to prevent tire squeal at turning areas.

MM-2. Public Services (Police)

The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

MM-3. Transportation Demand Management Plan and Monitoring Program

The Applicant shall prepare and submit a Transportation Demand Management (TDM) Plan to the Department of Transportation prior to the issuance of the first building permit for the Project. A final TDM Plan shall be submitted and approved by the Department of Transportation prior to the issuance of the first certificate of occupancy for the Project. The TDM Plan shall include strategies, as determined to be appropriate by the Department of Transportation, that would have a minimum fifteen (15) percent effectiveness in reducing new vehicle trips. TDM program elements should include, but not be limited to, the strategies listed in Mitigation Measure T-1 and the following:

- Site Design – The site will be designed to encourage walking, biking, and transit. Amenities would include:
  - New sidewalks and street trees along the perimeter
  - Improved street and pedestrian lighting.
- Unbundled Parking – Unbundling parking typically separates the cost of purchasing or renting parking spaces from the cost of the purchasing or renting a dwelling unit. Saving money on a dwelling unit by forgoing

a parking space acts as an incentive that minimizes auto ownership. Similarly, paying for parking (by purchasing or leasing a space) acts as a disincentive that discourages auto ownership and trip-making.

- Bicycle Parking – As described in Chapter 7, the Project will provide both long term and short-term bicycle parking. In addition, the Project could provide complementary amenities such as a self-service bike repair area.

A Monitoring Program shall be prepared to provide continued monitoring of the TDM Plan's effectiveness. The Monitoring Program shall be prepared by a licensed Transportation Engineer and be submitted to the Department of Transportation for review. The Monitoring Program shall continue until such time that the Project has shown, for three consecutive years, at a minimum of 85 percent occupancy, a minimum fifteen (15) percent effectiveness in reducing new vehicle trips through implementation of the TDM Plan. Should the review show that the trip reductions have not been met, the Project shall have one year to attain compliance or be subject to a penalty program.

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

CM-1. Habitat Modification (Nesting Native Birds)

Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86).

If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:

- Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
- If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet

for suitable raptor nesting habitat) until August 31.

- Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
- The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

CM-2. Soil Management Plan

Due to the historic UST removed from 1022 S. Hill Street, when mass excavation/grading is to be conducted at this portion of the Project Site, proper soil management protocols pursuant to SCAQMD Rule 1166 would need to be followed in the event that petroleum hydrocarbon impacted soil is encountered and displaced.

Construction and grading activities on-site shall implement Soil Management Protocols to the satisfaction of the Los Angeles Fire Department and the Department of Building and Safety if hydrocarbon impacted soil is found.

CM-3. Increased Noise Levels (Demolition, Grading, and Construction Activities)

Construction and demolition shall be restricted to the hours of 7:00 AM to 6:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday.

CM-4. Increased Noise Levels (Demolition, Grading, and Construction Activities)

To the maximum extent practical, demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

CM-5. Increased Noise Levels (Demolition, Grading, and Construction Activities)

The project contractor shall use power construction equipment with noise shielding and muffling devices.

CM-6. Increased Noise Levels (Demolition, Grading, and Construction Activities)

The project contractor shall erect a temporary noise-attenuating sound barrier along the perimeter of the Project Site. The sound wall shall be a minimum of 8 feet in height to block the line-of-site of construction equipment and off site receptors at the ground level. The sound barrier

shall include  $\frac{3}{4}$  inch plywood or other sound absorbing material capable of achieving a 5-dBA reduction in sound level.

CM-7. Increased Noise Levels (Demolition, Grading, and Construction Activities)

During structural framing, the project contractor shall utilize temporary portable acoustic barriers, partitions, or acoustic blankets to effectively block the line-of-sight between noise producing equipment and the adjacent residential land uses for purposes of ensuring noise levels at the adjacent residential land uses does not exceed 5 dBA over the ambient noise levels.

CM-8. Increased Noise Levels (Demolition, Grading, and Construction Activities)

An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

CM-9. Temporary Groundborne Vibration Impacts

All new construction work shall be performed so as not to adversely affect the structural integrity of the adjacent buildings. Prior to commencement of construction, the applicant shall retain a qualified structural engineer to survey the existing foundations and structures of the adjacent buildings, and provide a plan to protect them from potential damage. The performance standards of the structure monitoring plan shall including the following:

- Documentation shall consist of video and/or photographic documentation of accessible and visible areas on the exterior and select interior facades of the buildings. A registered structural engineer shall develop recommendations for the adjacent structure monitoring program that will include, but not be limited to, vibration monitoring, elevation and lateral monitoring points, crack monitors and other instrumentation deemed necessary to protect the adjacent structures from construction-related damage.
- The monitoring program shall survey for vertical and horizontal movement, as well as vibration thresholds. If the thresholds are met or exceeded, or noticeable structural damage becomes evident to the project contractor, work shall stop in the area of the affected building until measures have been taken to stabilize the affected building to prevent construction related damage to historic resources.
- In the event damage occurs to historic finish materials due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant and, if warranted, in a manner that meets the Secretary of the Interior's Standards.
- The structure monitoring program and initial survey documentation

shall be submitted to the Department of Building and Safety and received into the case file for the associated discretionary action permitting the project prior to construction.

CM-10. Public Services (Police – Demolition/Construction Sites)

Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

CM-11. Compliance with LADOT

The Applicant shall implement the project requirements detailed in DOT's communication to the Planning Department (DOT Case No. CEN 17-45630 dated July 12, 2017, attached) and as listed below.

*Construction Impacts*

DOT recommends that a construction work site traffic control plan be submitted to DOT for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that construction related traffic be restricted to off-peak hours to the extent possible.

*Transportation Demand Management (TDM) Program*

A final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the project. The TDM program should include, but not be limited to the following strategies:

- Provide an internal Transportation Management Coordination Program with an on-site transportation coordinator;
- Administrative support for the formation of carpools/vanpools;
- Design the project to ensure a bicycle, transit, and pedestrian friendly environment;
- Establish bike and walk to work promotions;
- Provide unbundled parking that separates the cost of obtaining assigned parking spaces from the cost of purchasing or renting residential units;
- Accommodate flexible/alternative work schedules and telecommuting programs;
- Coupled with the unbundled parking, provide on-site car share amenities for residents;
- Guaranteed ride home program;
- A provision requiring compliance with the State Parking Cash-out Law in all leases;
- Coordinate with DOT to determine if the project location is eligible for a future Integrated Mobility Hub (which can include space for a bike share kiosk, and/or parking spaces on-site for car-share vehicles);
- Provide on-site transit routing and schedule information;



- Provide a program to discount transit passes for residents/employees possibly through negotiated bulk purchasing of passes with transit providers;
- Provide rideshare matching services;
- Preferential rideshare loading/unloading or parking location;
- Contribute a one-time fixed fee contribution of \$50,000 to be deposited into the City's Bicycle Plan Trust Fund to implement bicycle improvements in the vicinity of the project.

#### *Highway Dedication and Street Widening Requirements*

The applicant should check with Bureau of Engineering's Land Development Group to determine the specific highway dedication, street widening and/or sidewalk requirements for this project.

#### *Parking Requirements*

The applicant should check with the Department of Building and Safety on the number of Code-required parking spaces needed for the project.

#### *Driveway Access and Circulation*

The traffic study indicates that two proposed driveways will provide access to the building's underground parking, including shared access for residents and retail and restaurant customers. The conceptual site plan for the project illustrated in Attachment 3 is acceptable to DOT. However, the review of this study does not constitute approval of the driveway dimensions, access and circulation scheme. Those require separate review and approval and should be coordinated with DOT's Citywide Planning Coordination Section (201 N. Figueroa Street, 4<sup>th</sup> Floor, Station 3, @ 213-482-7024). In order to minimize and prevent last minute building design changes, the applicant should contact DOT, prior to the commencement of building or parking layout design efforts, for driveway width and internal circulation requirements. New driveways should be Case 2 - designed with a recommended width of 30 feet for two-way operations or 16 feet for one-way operations. Delivery truck loading and unloading should take place on site with no vehicles having to back into the project via the proposed project driveways on any adjacent street. However, the truck loading dock off of the alley (Blackstone Court) is acceptable.

#### *Development Review Fees*

An ordinance adding Section 19.15 to the Los Angeles Municipal Code relative to application fees paid to DOT for permit issuance activities was adopted by the Los Angeles City Council in 2009 and updated in 2014. This ordinance identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.

#### CM-12. Construction Management Plan

The following will be implemented prior to construction:

- As traffic lane, parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, should be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
- Ensure that access will remain unobstructed for land uses in proximity to the project site during project construction, including bus stops.
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the project site and neighboring businesses and residences.
- Consult with public transit service providers, including LADOT and Metro, who have bus stops adjacent to the site to coordinate the temporary relocation of bus stop(s).

CM-13. Tribal Cultural Resources

In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

- a. Upon a discovery of a potential tribal cultural resource, the project Permittee shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-1454.
- b. If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Project Permittee and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
- c. The project Permittee shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the project Permittee, reasonably concludes that the tribe's recommendations are reasonable and feasible.
- d. The project Permittee shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The project Permittee shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.

- e. If the project Permittee does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the project Permittee may request mediation by a mediator agreed to by the Permittee and the City who has the requisite professional qualifications and experience to mediate such a dispute. The project Permittee shall pay any costs associated with the mediation.
- f. The project Permittee may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and determined to be reasonable and appropriate.
- g. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.
- h. Notwithstanding the above, any information determined to be confidential in nature, by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code, and shall comply with the City's AB 52 Confidentiality Protocols.

#### **BUREAU OF ENGINEERING - STANDARD CONDITIONS**

- S-1. (a) That the sewerage facilities charge be deposited prior to recordation of the final map over all of the tract in conformance with Section 64.11.2 of the Los Angeles Municipal Code (LAMC).
- (b) That survey boundary monuments be established in the field in a manner satisfactory to the City Engineer and located within the California Coordinate System prior to recordation of the final map. Any alternative measure approved by the City Engineer would require prior submission of complete field notes in support of the boundary survey.
- (c) That satisfactory arrangements be made with both the Water System and the Power System of the Department of Water and Power with respect to water mains, fire hydrants, service connections and public utility easements.
- (d) That any necessary sewer, street, drainage and street lighting easements be dedicated. In the event it is necessary to obtain off-site easements by separate instruments, records of the Bureau of Right-of-Way and Land shall verify that such easements have been obtained. The above requirements do not apply to easements of off-site sewers to be provided by the City.
- (e) That drainage matters be taken care of satisfactory to the City Engineer.

- (f) That satisfactory street, sewer and drainage plans and profiles as required, together with a lot grading plan of the tract and any necessary topography of adjoining areas be submitted to the City Engineer.
  - (g) That any required slope easements be dedicated by the final map.
  - (h) That each lot in the tract comply with the width and area requirements of the Zoning Ordinance.
  - (i) That 1-foot future streets and/or alleys be shown along the outside of incomplete public dedications and across the termini of all dedications abutting unsubdivided property. The 1-foot dedications on the map shall include a restriction against their use of access purposes until such time as they are accepted for public use.
  - (j) That any 1-foot future street and/or alley adjoining the tract be dedicated for public use by the tract, or that a suitable resolution of acceptance be transmitted to the City Council with the final map.
  - (k) That no public street grade exceeds 15%.
  - (l) That any necessary additional street dedications be provided to comply with the Americans with Disabilities Act (ADA) of 1990.
- S-2. That the following provisions be accomplished in conformity with the improvements constructed herein:
- (a) Survey monuments shall be placed and permanently referenced to the satisfaction of the City Engineer. A set of approved field notes shall be furnished, or such work shall be suitably guaranteed, except where the setting of boundary monuments requires that other procedures be followed.
  - (b) Make satisfactory arrangements with the Department of Traffic with respect to street name, warning, regulatory and guide signs.
  - (c) All grading done on private property outside the tract boundaries in connection with public improvements shall be performed within dedicated slope easements or by grants of satisfactory rights of entry by the affected property owners.
  - (d) All improvements within public streets, private streets, alleys and easements shall be constructed under permit in conformity with plans and specifications approved by the Bureau of Engineering.
  - (e) Any required bonded sewer fees shall be paid prior to recordation of the final map.
- S-3. That the following improvements be either constructed prior to recordation of the final map or that the construction be suitably guaranteed:
- (a) Construct on-site sewers to serve the tract as determined by the City Engineer.
  - (b) Construct any necessary drainage facilities.
  - (c) Install street lighting facilities to serve the tract as required by the Bureau of Street Lighting. Construct new pedestrian lights: two (2) on Olympic Boulevard and five

(5) on Hill Street. If street widening per BOE improvement conditions, relocate and upgrade street lights; three (3) on Hill Street and one (1) on Olympic Boulevard.

Notes:

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

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

- (d) Plant street trees and remove any existing trees within dedicated streets or proposed dedicated streets as required by the Street Tree Division of the Bureau of Street Maintenance. All street tree plantings shall be brought up to current standards. When the City has previously been paid for tree planting, the subdivider or contractor shall notify the Urban Forestry Division (213-847-3077) upon completion of construction to expedite tree planting.
- (e) Repair or replace any off-grade or broken curb, gutter and sidewalk satisfactory to the City Engineer.
- (f) Construct access ramps for the handicapped as required by the City Engineer.
- (g) Close any unused driveways satisfactory to the City Engineer.
- (h) Construct any necessary additional street improvements to comply with the Americans with Disabilities Act (ADA) of 1990.
- (i) That the following improvements be either constructed prior to recordation of the final map or that the construction be suitably guaranteed:
  - a. Improve Olympic Boulevard being dedicated and adjoining the subdivision by the construction of the following:
    - (1) A concrete curb, a concrete gutter, and a 15-foot full-width concrete sidewalk with tree wells.
    - (2) Suitable surfacing to join the existing pavements and to complete 36-foot half roadway.
    - (3) Any necessary removal and reconstruction of existing improvements.
    - (4) The necessary transitions to join the existing improvement.
  - b. Improve the alley being dedicated and adjoining the tract by construction of new surfacing to provide an 18-foot wide alley with longitudinal gutter located at the 10-foot half ally measured from the new tract boundary after the alley dedication including a construction of a new alley intersection with

Olympic Boulevard including any necessary removal and reconstruction of existing improvements and necessary transition including the drainage to join the existing alley improvements all satisfactory to the City Engineer:

NOTES:

The Advisory Agency approval is the maximum number of units permitted under the tract action. However the existing or proposed zoning may not permit this number of units. This vesting map does not constitute approval of any variations from the Los Angeles Municipal Code (LAMC), unless approved specifically for this project under separate conditions.

Any removal of the existing street trees shall require Board of Public Works approval.

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

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

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

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

## FINDINGS

As modified by the Planning and Land Use Management Committee on May 28, 2019

### FINDINGS OF FACT (CEQA)

- 1. Environmental Finding.** The City of Los Angeles, as the Lead Agency, prepared a Sustainable Communities Environmental Assessment (SCEA), Case No. ENV-2019-1792-SCEA, for the proposed Project located at 1000 South Hill Street (1000-1034 South Hill Street and 200-226 West Olympic Boulevard) for the construction, use, and maintenance of a 60-story, mixed-use, high-rise building with 700 residential dwelling units, 15,000 square feet of ground floor commercial/retail space, and 1,075 vehicular parking spaces and 786 bicycle parking spaces.

After conducting a public hearing on the matter on May 28, 2019 (CF 18-1206), the Planning and Land Use Management (PLUM) Committee of the City Council considered all comments received regarding the SCEA and the Project, and adopted the SCEA and MMP pursuant to Public Resources Code (PRC) Section 21155.2(b)(6) finding that the Project is a "Transit Priority Project" as defined by PRC Section 21155, specifically:

- (a) The Project is consistent with the general use designation, density, building intensity, and applicable policies specified in the project area in the current SCAG RTP/SCS.
- (b) The Project contains at least 50 percent residential use, based on total building square footage, and if the project contains between, 26 percent and 50 percent non-residential uses, a floor area ratio of not less than 0.75;
- (c) The Project provides a minimum net density of at least 20 dwelling units per acre;
- (d) The Project is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan, consistent with PRC Section 21155(b).

The Transit Priority Project has incorporated all feasible mitigation measures, performance standards, or criteria set forth in prior EIR(s), including the SCAG 2016-2040 RTP/SCS (Regional Transportation Plan/ Sustainable Communities Strategy) EIR SCH No. 20150311035; finding that all potentially significant effects required to be identified in the initial study have been identified and analyzed in the SCEA; and finding that with respect to each significant effect on the environment required to be identified in the initial study for the SCEA, changes or alterations have been required in or incorporated into the Project that avoid or mitigate the significant effects to a level of insignificance or those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

The SCEA was published on April 4, 2019 and the comment period ended on May 6, 2019. During the public review period, three comment letters were submitted to the City from two public agencies (South Coast Air Quality Management District and Metro) and one special interest organization (Housing Is A Human Right). All comments received, as well as responses to those comments submitted by Parker Environmental Consultants on May 23, 2019, can be found in the administrative record.

The South Coast Air Quality Management District (SCAQMD) provided comments acknowledging that the Project's construction activities would result in less than significant air quality impacts, but further recommending additional mitigation measures (ie., the use of Tier 4 Construction Equipment or Level 3 Diesel Particulate Filters). However, CEQA Guidelines 15126.4 states that "mitigation measures are not required for effects which are not found to be significant." SCAQMD's recommendation to mitigate impacts that have been found to be less than significant is not consistent with CEQA or relevant case law. Additionally, SCAQMD recommends discussion on compliance with SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). However, the Project includes the demolition of an existing surface parking lot, and there are no existing structures located on the Project Site. As such the Project would not have the potential to generate any asbestos emissions during demolition or construction.

Metro provided comments regarding the existing Metro Bus stop located directly adjacent to the Project Site at South Hill Street and West Olympic Boulevard and recommends that the City study whether vehicular conflicts will occur from the completed Project and if bus service rerouting or bus stop relocation is proposed. Metro comments that the existing Metro Bus stop must be maintained or relocated both during construction and after construction. As required by modified Mitigation Measure T-3, a Construction Management Plan will be prepared and approved by LADOT prior to construction. The applicant will be required to consult with public transit service providers, including LADOT and Metro, who have bus stops adjacent to the site during this preparation of the Construction Management Plan to coordinate the temporary relocation of this bus stop prior to construction.

Housing Is A Human Right provided comments asserting that the Project is in violation of the Community Redevelopment Agency (CRA) City Center Redevelopment Plan as the Plan Area does not provide 15 percent affordable housing area wide. However, the City Center Redevelopment Plan does not provide any affordable housing mandates for new development projects. The provisions of Section 409.2 of the Redevelopment Plan directs the CRA and City to allocate 20 percent of the tax revenue derived from the Project toward affordable housing. The Redevelopment Plan does not, however, provide any specific mandates requiring the Project to provide affordable housing on-site. Notwithstanding the fact there is no affordable housing requirement for the Plan area, it should be noted that the Proposed Project is seeking a Transfer of Development Rights (TFAR) which requires a Public Benefit Payment, the payment of which could be used to increase affordable housing within the Plan area through the City's Affordable Housing Trust Fund. As such, the City may authorize some portion of the payment derived from the Public Benefit Payment to be directed towards affordable housing programs.

Pursuant to Public Resources Code Section 21155.2, the City Council has considered the SCEA and all comments on the SCEA and the Project received during and after the public review process and responses thereto, and other pertinent evidence in the record, and in its independent judgment, finds that the SCEA properly identifies all potential impacts of the Projects and that those impacts have been mitigated, that the Project Site is located within a Transit Priority Area as defined by Public Resource Code (PRC) Section 21099(a)(7); find that the mitigation measures have been incorporated as enforceable conditions of the Project, and the adopted Mitigation Monitoring Program, to mitigate or avoid significant effects of the proposed Project on the environment and to ensure compliance during Project implementation; and find that none of the information submitted constitutes significant new information, including but not limited to testimony at the public hearings on the Project or information contained in the appeals of the Project's approval of Case No. VTT-74760, and that any such information or testimony does not constitute



substantial evidence of a significant impact, or a feasible mitigation measure not already included in the SCEA. In accordance with the requirements of Public Resources Section 21081.6, the City hereby adopts each of the mitigation measures in the SCEA as conditions of approval for the Project.

FIND, pursuant to Public Resources Code (PRC) Section 21155.2, after consideration of the whole of the administrative record, including the SB 375 Sustainable Communities Environmental Assessment, No. ENV-2019-1792-SCEA ("SCEA"), and all comments received, after imposition of all mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; FIND that the City Council held a hearing on and adopted the SCEA on May 28, 2019 pursuant to PRC Section 21155.2(b); FIND the Project is a transit priority project pursuant to PRC Section 21155 and the Project has incorporated all feasible mitigation measures, performance standards, or criteria set forth in prior EIR(s), including SCAG's 2016-240 RTP/SCS EIR SCH No. 2015031035; FIND all potentially significant effects required to be identified in the initial study have been identified and analyzed in the SCEA; FIND with respect to each significant effect on the environment required to be identified in the initial study for the SCEA, changes or alterations have been required in or incorporated into the Project that avoid or mitigate the significant effects to a level of insignificance or those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency; FIND the SCEA reflects the independent judgment and analysis of the City; FIND the mitigation measures have been made enforceable conditions on the project; and ADOPT the SCEA and the Mitigation Monitoring Program prepared for the SCEA.

No additional environmental review is required for the City Council to approve and adopt the requested discretionary action, Case No. VTT-74760-1A, for the Project; and incorporates the CEQA Findings made pursuant to PRC Section 21081 and Mitigation Monitoring Program adopted by the City Council by reference. Consistent with the PRC Section 21081.6(a)(2), the records upon which this decision is based are located in the Department of City Planning Offices at 200 North Spring Street, Room 621, Los Angeles, California 90012.

#### **FINDINGS OF FACT (SUBDIVISION MAP ACT)**

In connection with the approval of Vesting Tentative Tract No. 74760, the Advisory Agency of the City of Los Angeles, pursuant to Sections 66473.1, 66474.60, .61 and .63 of the State of California Government Code (the Subdivision Map Act), makes the prescribed findings as follows:

- (a) THE PROPOSED MAP IS CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

The Land Use Element of the General Plan consists of the 35 Community Plans within the City of Los Angeles. The project site is located within the Central City Community Plan, which establishes goals, objectives, and policies for future development at a neighborhood level. Additionally, through the Land Use Map, the Community Plan designates parcels with a land use designation and zone. The Land Use Element is further implemented through the Los Angeles Municipal Code (LAMC). The zoning regulations contained within the LAMC regulates, but is not limited to, the maximum permitted density, height, parking, and the subdivision of land.

The subdivision of land is regulated pursuant to Article 7 of the LAMC. Specifically, Section 17.05 C requires that the vesting tentative tract map be designed in compliance with the

zoning regulations applicable to the project site. The project site is located within the Central City Community Plan, which designates the site with a High Density Residential land use designation. The land use designation lists the R5 Zone as the corresponding zones. The Project Site is zoned [Q]R5-4D-O, which is consistent with the land use designation. The project site has approximately 50,611 gross square feet of lot area and is located within the Greater Downtown Housing Incentive Area. The site is not subject to any density restrictions but is limited to a FAR of 6:1 per the "D" Limitations contained in Ordinance No. 164307 (SA2645). The project is seeking a Transfer of Floor Area Rights (TFAR) for the approximate amount of 354,277 square feet of floor area to the Project site, permitting an FAR of 13:1 and 657,943 square feet of floor area, as permitted within the Central City Redevelopment Project Area.

In addition to LAMC Section 17.05 C, LAMC Section 17.06 B requires that the tract map be prepared by or under the direction of a licensed surveyor or registered civil engineer. The tract map was prepared by Lawrence Wilson, Licensed Land Surveyor with the State of California (No. 6712), and contains information regarding the boundaries of the project site, as well as the abutting public rights-of-way, existing and proposed dedication, and improvements of the tract map. The tract map indicates the tract number, notes, legal description, contact information for the owner, applicant, and engineer, as well as other pertinent information as required by LAMC Section 17.06 B. Therefore, the proposed map demonstrates compliance with LAMC Sections 17.05 C, 17.06 B, and 12.22 C.27 and is consistent with the applicable General Plan.

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

For purposes of a subdivision, design and improvement is defined by Section 66418 of the Subdivision Map Act and LAMC Section 17.02. Design refers to the configuration and layout of the proposed lots in addition to the proposed site plan layout. Pursuant to Section 66427(a) of the Subdivision Map Act, the location of the buildings is not considered as part of the approval or disapproval of the map by the Advisory Agency. Easements and/or access and "improvements" refers to the infrastructure facilities serving the subdivision. LAMC Section 17.05 enumerates the design standards for a tract map and requires that each map be designed in conformance with the Street Design Standards and in conformance with the General Plan. As indicated in Finding (a), LAMC Section 17.05 C requires that the tract map be designed in conformance with the zoning regulations of the project site. The Project Site is zoned [Q]R5-4D-O, which is consistent with the land use designation. The project site has approximately 50,611 square feet of gross lot area and is located within the Greater Downtown Housing Incentive Area. The site is not subject to any density restrictions but is limited to a FAR of 6:1 per the "D" Limitations contained in Ordinance No. 164307 (SA2645). The project is seeking a Transfer of Floor Area Rights (TFAR) for the approximate amount of 354,277 square feet of floor area to the Project site, permitting an FAR of 13:1 and 657,943 square feet of floor area, as permitted within the Central City Redevelopment Project Area.

The tract map was distributed to and reviewed by the various city agencies of the Subdivision Committee that have the authority to make dedication, and/or improvement recommendations. The Bureau of Engineering reviewed the tract map for compliance with the Street Design Standards. The Bureau of Engineering has recommended improvements to the public right-of-way along Olympic Boulevard and Hill Street, consistent with the standards of the Mobility Element and Downtown Street Standards. In addition, the Bureau of Engineering has recommended all necessary street improvements be made to comply with the Americans with Disabilities Act (ADA) of 2010. The Bureau of

Street Lighting has requested that new street lights be installed on Olympic Boulevard and Hill Street. As conditioned, the design and improvements of the proposed subdivision are consistent with the applicable General Plan.

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

The project site consists of seven contiguous lots totaling approximately 50,611 gross square feet (1.16 acres) in area. The site has approximately 145 feet of frontage along the southerly side of West Olympic Boulevard and approximately 350 feet of frontage along the easterly side of South Hill Street. The property is currently developed with a surface parking lot. The site is zoned [Q]R5-4D-O and is located within the Central City Community Plan, which designates the site for Low High Density Residential land uses. The site is not located within a Specific Plan area, but is located within the Greater Downtown Housing Incentive Area, Adaptive Reuse Incentive Area, City Center Redevelopment Project Area, Transit Oriented Communities (Tier 3), Methane Zone, and Los Angeles State Enterprise Zone.

The Project is the demolition of an existing surface parking lot and the construction, use, and maintenance of a 60-story mixed-use building (760 feet in height) with 700 residential dwelling units and 15,000 square feet of ground floor commercial/retail space. The Project includes 657,943 square feet of floor area on the 50,611 gross square-foot site, resulting in a Floor Area Ratio (FAR) of 13:1. The Project proposes a total of 1,075 vehicle parking spaces within seven subterranean levels and Levels One through Four above grade. A total of 708 long-term and 78 short-term bicycle parking spaces are proposed, along with approximately 86,976 square feet of open space and amenity areas for residents on the site. Seven street trees would be removed from the public right-of-way; 184 new trees are proposed, including 42 street trees.

The tract has been approved contingent upon the satisfaction of the Department of Building and Safety, Grading Division, prior to the recordation of the map and issuance of any permits. Therefore, the site will be physically suitable for the proposed type of development.

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

The adjacent property to the north, across Olympic Boulevard, is zoned [Q]R5-4D and developed with a vacant one-story mini-shopping center. The adjoining property to the south is zoned [Q]R5-4D and developed with the Mayan Theater. The adjacent properties to the east, across the public alley, are zoned C2-4D-O-SN and developed with one-story commercial buildings and a 12-story commercial office building. The adjacent properties to the west, across Hill Street, are zoned [Q]R5-4D-O and developed with a commercial corner building and a surface parking lot. The site is located approximately 3,500 feet (0.7 miles) from Interstate 110 to the west and Interstate 10 to the east.

The project entails the construction of a 60-story mixed-use building (760 feet in height) with 700 residential dwelling units and 15,000 square feet of ground floor commercial/retail space. The project site has approximately 50,611 square feet of gross lot area and is located within the Greater Downtown Housing Incentive Area. The site is not subject to any density restrictions but is limited to a FAR of 6:1 per the "D" Limitations contained in Ordinance No. 164307 (SA2645). The project is seeking a Transfer of Floor Area Rights (TFAR) under incidental Case No. CPC-2016-4710-TDR-MCUP-SPR for the approximate

amount of 354,277 square feet of floor area to the Project site, permitting an FAR of 13:1 and 657,943 square feet of floor area, as permitted within the Central City Redevelopment Project Area. Additionally, prior to the issuance of a demolition, grading, or building permit, the project would be required to comply with conditions herein and applicable requirements of the LAMC. As conditioned the proposed tract map is physically suitable for the proposed density of the development.

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

The project site, as well as the surrounding area, are presently developed with structures and do not provide a natural habitat for either fish or wildlife. Any demolition, grading, and construction will be conducted per the requirements of the Los Angeles Municipal Code and associated permits needed to perform such work. These permits also restrict work hours to mitigate noise pollution.

- (f) THE DESIGN OF THE SUBDIVISION OR TYPE OF IMPROVEMENTS IS NOT LIKELY TO CAUSE SERIOUS PUBLIC HEALTH PROBLEMS.

There appears to be no potential public health problems caused by the design or improvement of the proposed subdivision. The development is required to be connected to the City's sanitary sewer system, where the sewage will be directed to the LA Hyperion Treatment Plant, which has been upgraded to meet statewide ocean discharge standards.

The Bureau of Engineering has reported that the proposed subdivision does not violate the existing California Water Code because the subdivision will be connected to the public sewer system and will have only a minor incremental impact on the quality of the effluent from the Hyperion Treatment Plant.

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

As required by LAMC Section 12.03, the project site has a minimum of 20 feet of frontage along Olympic Boulevard and Hill Street, which are public streets. The project site consists of parcels identified as Lots 9, 10, and 12-15 of the E.H. Workman Tract and Lot A of Tract No. 1814 and is identified by the Assessor Parcel Map Nos. 5139-013-003, 5139-013-004, 5139-013-005, 5139-013-006, 5139-013-015, 5139-013-017, and 5139-013-018. There are no known easements acquired by the public at large for access through or use of the property within the proposed subdivision, as identified on the tract map. Necessary easements for utilities will be acquired by the City prior to the recordation of the proposed parcel map.

Therefore, the design of the subdivision and the proposed improvements would not conflict with easements acquired by the public at large for access through or use of the property within the proposed subdivision.

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

In assessing the feasibility of passive or natural heating or cooling opportunities in the proposed subdivision design, the applicant has prepared and submitted materials which consider the local climate, contours, configuration of the parcel(s) to be subdivided and other design and improvement requirements. Providing for passive or natural heating or cooling opportunities will not result in reducing allowable densities or the percentage of a lot which may be occupied by a building or structure under applicable planning and zoning in effect at the time the tentative map was filed.

The lot layout of the subdivision has taken into consideration the maximizing of the north/south orientation.

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

These findings shall apply to both the tentative and final maps for Tract No. 74760.

**Exhibit B:**  
**Public Comments Received During the Publication Period for**  
**Case No. ENV-2019-1792-SCEA**



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA E-MAIL AND USPS:

May 1, 2019

[Michael.sin@lacity.org](mailto:Michael.sin@lacity.org)

Michael Sin, City Planning Associate  
City of Los Angeles, City Planning Department  
200 N. Spring Street, Room 621  
Los Angeles, CA 90012

## **Sustainable Communities Environmental Assessment (SCEA) for the Proposed Olympic and Hill Project (ENV-2019-1792-SCEA)**

The South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final SCEA.

### South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish existing parking structure and build a 657,943-square-foot mixed-use building with 700 residential units, 15,000 square feet of commercial uses, and subterranean parking on 1.16 acres (Proposed Project). Based on a review of aerial photographs, South Coast AQMD staff found that multi-family residences are located within approximately 100 feet across South Hill Street. Construction of the Proposed Project is assumed to take approximately 30 months to complete with buildout in 2022<sup>1</sup>.

### South Coast AQMD Staff's Comments

In the Air Quality Section, the Lead Agency found that the Proposed Project's construction activities would result in less than significant regional and localized air quality impacts. However, regional NO<sub>x</sub> emissions and localized particulate matter (PM) emissions were found to be slightly below South Coast AQMD's respective air quality CEQA significance thresholds. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. To further reduce the Proposed Project's regional NO<sub>x</sub> emissions and localized PM emissions during construction, particularly in the grading/excavation phase, and potential impacts on the multi-family residences located within 100 feet of the Proposed Project, South Coast AQMD staff recommends that the Lead Agency review and incorporate the following mitigation measures in the Final SCEA. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD's CEQA Air Quality Handbook website<sup>2</sup>.

#### *Tier 4 Construction Equipment or Level 3 Diesel Particulate Filters*

Use off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during construction. Such equipment should be outfitted with Best Available Control Technology (BACT) devices including, but not limited to, a CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPFs are capable of achieving at least an 85 percent reduction in particulate matter emissions<sup>3</sup>. A list of CARB verified DPFs are available on the CARB website<sup>4</sup>.

<sup>1</sup> SCEA. Page VI-9.

<sup>2</sup> South Coast AQMD. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

<sup>3</sup> California Air Resources Board. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: [https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04\\_workshop.pdf](https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf).

<sup>4</sup> *Ibid*. Page 18.

Additionally, the Lead Agency should include this requirement in applicable bid documents, and that successful contractor(s) must demonstrate the ability to supply compliant equipment prior to the commencement of any construction activities. A copy of each unit's certified tier specification and CARB or South Coast AQMD operating permit (if applicable) should be available upon request at the time of mobilization of each applicable unit of equipment. Moreover, the Lead Agency should require periodic reporting and provision of written documentation by contractors to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance. In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is reviewed and approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, Tier 3 construction equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable.

#### *Enforceability*

To ensure that Tier 4 construction equipment will be used during the construction phase of the Proposed Project, South Coast AQMD staff recommends that the Lead Agency include the requirement as a mitigation measure or a project design feature for the Proposed Project in the Final SCEA.

#### *South Coast AQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities*

Since the Proposed Project would include demolition of existing buildings, asbestos may be encountered during demolition. As such, South Coast AQMD staff recommends that the Lead Agency include a discussion to demonstrate compliance with South Coast AQMD Rule 1403<sup>5</sup> in the Air Quality Section of the Final SCEA.

#### Closing

Please provide the South Coast AQMD with written responses to all comments contained herein prior to the certification of the Final SCEA. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project. South Coast AQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have any questions regarding the enclosed comments.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC190405-03

Control Number

---

<sup>5</sup> South Coast AQMD. Rule 1403. Accessed at: <http://www.aqmd.gov/docs/default-source/rulebook/reg-xiv/rule-1403.pdf>.





Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

May 3, 2019

Michael Sin  
Department of City Planning  
City of Los Angeles  
200 N. Spring Street, Room 621  
Los Angeles, CA 90012  
Sent by Email: michael.sin@lacity.org

RE: Olympic and Hill Project – 1000-1034 S. Hill St. and 220-226 W. Olympic Blvd.  
Sustainable Communities Environmental Assessment (SCEA), Case No. ENV-2019-1792-SCEA

Dear Mr. Sin:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Olympic and Hill Project (Project) located at 1000 South Hill Street in the City of Los Angeles (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

The purpose of this letter is to provide comments on the Project's SCEA and to outline recommendations from Metro concerning issues that are germane to our agency's statutory responsibility in relation to the Metro bus facilities and services, which may be affected by the proposed Project. In addition to the specific comments outlined below, Metro would like to provide the Applicant with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro-owned right-of-way (ROW). The documents and additional resources are available at [www.metro.net/projects/devreview/](http://www.metro.net/projects/devreview/).

### **Project Description**

The proposed Project is adjacent to Metro Bus services and includes 700 residential dwelling units and 15,000 square feet of ground floor commercial/retail space. The proposed Project would be 60 stories high consisting of seven levels of parking below grade. Proposed are 290 parking spaces including 258 long-term and 32 short-term bicycle parking spaces.

### **Preliminary Comments**

#### *Bus Stop Adjacency*

1. Service: Metro Bus Lines 2, 4, 28, 83, 90, 91, 94, 302, 728, and 794 operate on South Hill Street, adjacent to the proposed Project. One Metro Bus stop is directly adjacent to the

proposed Project at South Hill Street and West Olympic Boulevard. Los Angeles Department of Transportation (LADOT) also provides service in this area and should be consulted.

2. Impact Analysis: With an anticipated increase in traffic during and after construction, the final SCEA should study potential effects on the Metro Bus Lines. Metro appreciates the analysis of transit impacts in the current SCEA; in addition the final SCEA should study whether vehicular conflicts will occur from the operation of and shipment/deliveries to the completed Project and if bus service rerouting or bus stop relocation is proposed when the Project is operational.
3. Final Bus Stop Condition: The existing Metro Bus stop must be maintained as part of the final Project. During construction, the stop must be maintained or relocated consistent with the needs of Metro Bus operations. Final design of the bus stop and surrounding sidewalk area must be ADA-compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.
4. Driveways: Driveways accessing parking and loading at the Project site should be located away from the transit stop, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.
5. Bus Stop Access & Enhancements: Metro encourages the installation of bus shelters with benches, wayfinding signage, enhanced crosswalks and ramps compliant with the Americans with Disabilities Act (ADA), as well as pedestrian lighting and shade trees in paths of travel to access bus stops and other amenities that improve safety and comfort for transit riders. The City should consider requesting the installation of such amenities as part of the development of the site.
6. Bus Operations Contacts: Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 with any questions and at least 30 days in advance of initiating construction activities. Other municipal buses may also be impacted and should be included in construction outreach efforts.

### **Transit Orientation**

Considering the Project's proximity to the bus stop, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Land Use: Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City and Applicant to be mindful of the Project's proximity to the bus stop, including orienting pedestrian pathways towards the bus stop.
2. Transit Connections: Given the Project's adjacency to the Metro Bus stop, the Project design should consider and accommodate transfer activity between bus and bus lines that will occur along the sidewalks and public spaces. Metro recently completed the Metro Transfers Design Guide, a best practice document on transit improvements. This can be accessed online at <https://www.metro.net/projects/systemwidedesign>.

3. Walkability: Metro strongly encourages the installation of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access the nearby bus stops and rail stations. The City should consider requiring the installation of such amenities as part of the conditions of approval for the Project.
4. Access: The Project should address first-last mile connections to transit, encouraging development that is transit accessible with bicycle and pedestrian-oriented street design connecting transportation with housing and employment centers. For reference, please view the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at:  
[http://media.metro.net/docs/sustainability\\_path\\_design\\_guidelines.pdf](http://media.metro.net/docs/sustainability_path_design_guidelines.pdf)
5. Active Transportation: Metro encourages the Applicant to promote bicycle use through adequate short-term bicycle parking, such as ground level bicycle racks, as well as secure, access-controlled, enclosed long-term bicycle parking for residents, employees and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, easy to locate, and equipment installed with preferred spacing dimensions, so they can be safely and conveniently accessed. The Applicant should coordinate with the Metro Bike Share Program for a potential Bike Share station at this development. Additionally, the Applicant should help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations. The Applicant is also encouraged to support these connections with wayfinding signage inclusive of all modes of transportation.
6. Wayfinding: The Project is also encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. Any temporary or permanent wayfinding signage with content referencing Metro services, or featuring the Metro brand and/or associated graphics (such as bus or rail pictograms) requires review and approval by Metro Art & Design. Please contact Lance Glover, Senior Manager of Signage and Environmental Graphic Design, at [GloverL@metro.net](mailto:GloverL@metro.net).
7. Multi-modal Connections: With an anticipated increase in traffic, Metro encourages an analysis of impacts on non-motorized transportation modes and consideration of improved non-motorized access to the Project and nearby transit services, including pedestrian connections and bike lanes/paths. Appropriate analyses could include multi-modal LOS calculations, pedestrian audits, etc.
8. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements for specific areas and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.
9. Transit Pass: Metro would like to inform the Applicant of Metro's employer transit pass programs including the Annual Transit Access Pass (A-TAP) and Business Transit Access Pass (B-TAP) programs which offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. For more information on these programs, contact Devon Deming at [DemingD@metro.net](mailto:DemingD@metro.net).

*Congestion Management Program*

Beyond impacts to Metro facilities and operations, Metro must also notify the Applicant of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the “2010 Congestion Management Program for Los Angeles County,” Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

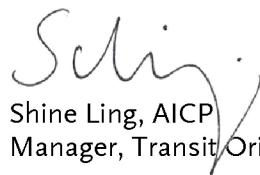
1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed Project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed Project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the Project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions regarding this response, please contact me by phone at 213-922-2671, by email at [LingS@metro.net](mailto:LingS@metro.net), or by mail at the following address:

Metro Development Review  
One Gateway Plaza MS 99-22-1  
Los Angeles, CA 90012-2952

Sincerely,



Shine Ling, AICP  
Manager, Transit Oriented Communities

Cc: Mark Spector, Senior Development Manager, [mspector@onni.com](mailto:mspector@onni.com)

Attachments and links:

- Adjacent Development Handbook: <https://www.metro.net/projects/devreview/>
- CMP Appendix D: Guidelines for CMP Transportation Impact Analysis



To:  
Michael Sin  
City of Los Angeles  
Department of City Planning  
200 N. Spring Street  
Los Angeles, CA 90012

From:  
Susan Hunter  
Housing is a Human Right  
6500 Sunset Blvd.  
Los Angeles, CA 90028

5/1/2019

RE: ENV-2019-1792-SCEA/ Olympic and Hill Project/ 1000-1034 S Hill Street, Los Angeles  
CA 90015

Mr. Sin,

It has come to our attention that the proposed project is in violation of the CRA City Center Redevelopment Plan as the Plan Area does not meet with Health & Safety Code for 15% affordable housing area wide. Proposed plan is in violation of Health & Safety Code §50052.5, to persons and families of low- or moderate-income, as defined in Health & Safety Code §50093, very low-income households, as defined in Health & Safety Code §50105, and extremely low-income households as defined in Health & Safety Code §50106.

The proposed project must conform the all local Community and CRA Redevelopment Plans. Per AB 1505 (Bloom), the proposed project lacks any affordable housing, which only compounds the problem of not having the required amount of affordable housing area wide. City Center is in a deficit of affordable housing needs due to major housing construction in the area.

SCEA fails to examine the lack of meeting affordable housing requirements area wide, therefore the proposed project will have to include 15% (105 units of) affordable housing to help diminish the overall lack of affordable housing available. Until such time as the Plan Area meets the affordable housing requirements deemed under State law, then any future projects moving forward will have to include enough affordable housing in all categories in order to reach compliance.

Thank you for your time,  
Susan Hunter  
Housing Justice Organizer